

# Revised Sustainability Appraisal Report





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## Non-technical summary

### What is Sustainability Appraisal?

Sustainability Appraisal (SA) is a process of making decisions which balance economic, social and environmental factors for positive benefit. Sustainability doesn't have to be difficult to understand. It is about treating the earth as if we intended to stay and making sure that future generations inherit the earth in a good state.

### What is Strategic Environmental Assessment?

The objective of the Strategic Environmental Assessment (SEA) Directive is:

“to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans . . . with a view to promoting sustainable development”.

The objectives of the Strategic Environmental Assessment (SEA) Directive are:

- Identifying strategic alternatives;
- Collecting baseline environmental information;
- More thorough prediction of significant environmental effects;
- Greater consultation of the public and statutory environmental agencies;
- Addressing and monitoring the significant environmental effects of the plan.

The SEA Directive defines environmental assessment as a procedure comprising of:

- Preparing an environmental report on the likely significant effects;
- Preparing an environmental report on the likely significant effects of the draft plan;
- Carrying out consultation on the draft plan and the accompanying environmental report;
- Taking into account the environmental report and the results of consultation in decision making; and
- Providing information when the plan is adopted and showing how the results of the SEA have been taken into account.

The main difference between Strategic Environmental Assessment (SEA) and Sustainability Appraisal (SA) is that SEA is focused primarily on environmental effects, whilst SA incorporates the requirements of the SEA Directive and goes further by examining the social and economic impacts of the plan. Therefore, the SA process fully complies with the European Parliament's SEA Directive and the SEA Regulations prepared by the British Government.

### What is the The Plan for Stafford Borough?

The Plan for Stafford Borough is the name of the new Local Plan. Local planning authorities must prepare a Local Plan which sets planning policies in a local authority area. These are very important when deciding planning applications. The Plan for Stafford Borough is the first part of the new Local Plan, which sets out the development strategy for Stafford Borough, identifies strategic development locations and planning policies. The new Local Plan will also comprise the following:

- Sites and Allocation Development Plan Document
- Neighbourhood Plans
- Supplementary Planning Documents

Details of the timetable of production for these documents can be found in the Local Development Scheme (LDS) on the Stafford Borough website.

### Character of Stafford Borough

Stafford Borough covers an area of over 230 square miles and is centrally placed within Staffordshire County. Staffordshire is a large County between the conurbations of Manchester, 50 miles to the north, and Birmingham, 30 miles to the south. The Borough shares boundaries with Newcastle-under-Lyme, Stoke-on-Trent, Staffordshire Moorlands, East Staffordshire, Lichfield, Cannock Chase, South Staffordshire, Telford and Wrekin and North Shropshire. Stafford Borough is well located within the West Midlands region and nationally in terms of the transport network.

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The Stafford Borough area is locally distinctive in terms of character, landscape and natural resources. The area is home to over 130,600 people (2011 Census). 60% of the population live in Stafford and Stone whilst the remainder live in the rural area where there are a number of larger villages such as Eccleshall, Gnosall, Hixon, Barlaston, Great Haywood and Little Haywood as well as smaller villages and hamlets. To the north of the Borough are parts of the suburban fringe of Newcastle-under-Lyme and Stoke-on-Trent at Clayton, Blythe Bridge, Trentham and Meir Heath. There are more than 50 villages and hamlets, which vary in size, from a population of over 3,500 at Gnosall to under 200 people at Adbaston.

### Issues - Economic

Stafford Borough is strategically placed in the centre of Staffordshire with access to the M6 motorway and the West Coast mainline railway. Historically the Borough's economy has centred on traditional manufacturing industry, but in recent years such industries have undergone dramatic restructuring leading to job losses, de-industrialisation and considerable scaling back in levels of production, particularly in Stafford. This has had a significant impact on the local economy changing from predominantly manufacturing to more service based industries, with forecasts anticipating that this trend will continue in subsequent years. A result of these changes has also led to a loss of employment areas to housing development. Despite this Stafford has seen a slight increase in business growth in the last few years.

There are concerns due to the lack of diversity in certain types of employment, with the majority of the workforce employed in public administration, health and education, and 20.6% of people employed in the distribution, hotel and restaurant sectors. Therefore one issue is to diversify and adapt the employment base to encourage emerging high technology and creative industries, using strengths such as the higher education and renewable energy sectors.

Stafford Borough has a low unemployment rate and the mean household income is above both the national and the West Midlands average.

Much of the Borough is still agricultural and there are challenges in terms of alternative crops for renewable energy, changes in agricultural practises and development in the countryside.

The tourism sector in the Borough offers many opportunities for the local economy through visits to Shugborough, the Ancient High House, Isaac Walton Cottage, Cannock Chase Country Park, Stafford Castle and the canal network.

Stafford is the Borough's strategic town centre and a principal shopping destination. In recent years Stafford has begun to fall behind other competing centres across the region in terms of its retailing offer. The recent Town Centre Capacity Study showed that the number of vacant units (shops and offices) in the town centre are above the national average. The study also found that convenience shops and leisure opportunities are below the national average but comparison and retail service were above the national average.

### Social Issues

Evidence highlights that Stafford Borough has a number of areas with deficiencies in quality and quantity of open space, sport and recreation provision, particularly in Stafford town and certain rural areas. This type of provision can significantly improve the quality of life for local communities through associated health, well-being and productivity benefits.

The current demand for housing in Stafford Borough is high, caused by a combination of natural demographic change, an increased growth in single person households and inward migration from adjoining areas. Pressure on the local housing market has increased in recent years due to a rise in prices, with the average house price in Stafford, at 2011, being £182,616. In addition there is a lack of 2 and 3 bedroomed houses within the existing housing stock within Stafford Borough, particularly in Stone.

Many groups are excluded from the housing market, in particular groups such as young people, single parent families and those on average local wages, due to the high cost of housing. The rural areas of Stafford Borough have experienced the most significant increase in house prices over recent years, creating pressure on rural communities with younger people being unable to afford the increased house prices. Whilst affordable housing has been provided over the years, this has not been consistent and is below identified needs.

There is also a lack of provision to meet the identified needs of Gypsies and Travellers across the Borough, as identified in the Northern Housing Market Area Gypsy and Traveller Accommodation Needs Assessment (GTAA).

In line with national trends the population demographic of Stafford Borough is ageing and by 2025 the projected numbers of people over 64 years of age is expected to increase by 49.4% to 34,800 people whilst the number of people aged over 85 years will almost double by to 95%. This raises issues for housing need and specialist housing including specially designed housing across Stafford Borough.

Smaller settlements across the Borough such as Eccleshall, Gnosall, Great and Little Haywood provide more localised services and facilities for their communities. However in recent years a number of these centres have experienced a reduction in the range of services and facilities leading to greater car travel to other larger centres.

Stafford Borough has a lower than average crime rate. However the general public continue to have a perceived fear of crime including anti-social behaviour, youth crime as well as drug and alcohol related problems.

Stafford is not considered to be a deprived Borough in comparison with some parts of the country. However, there are significant levels of poverty and isolation in some parts of Stafford Borough, and some wards in Stafford Town are among the poorest in Staffordshire.

### Environmental Issues

Climate change is now considered to be the greatest threat to our social well-being and economic future. The effects of Climate change such as extreme weather and greater risk of flooding are a real issue for the UK. Severe flood events caused extensive damage to Stafford town and extensive tracts of farmland in recent years.

The renewable energy study identified renewable energy and low carbon opportunities across the Borough. In addition the Green Infrastructure study identified a network of green infrastructure and opportunities that can help combat the effects of climate change.

Water quality, in terms of biological and chemical quality, is improving in rivers within the Borough but could improve further.

The Borough has a rich and varied natural environment composed of a diverse range of wildlife sites and habitats, including seventeen Sites of Special Scientific Interest (SSSI), three Ramsar sites, four Special Areas of Conservation (SAC) and three National Nature Reserves and two areas of Green Belt. In addition there are more than a hundred sites identified locally as Sites of Biological Interest (SBIs). There has been decline in certain species and habitats across the Borough, along with the quality of some protected areas. The protection, enhancement, improvement and proper management of these sites is a key issue for the Stafford Borough. The Staffordshire Biodiversity Action Plan identifies land to the south east as the Cannock Chase Ecosystem Action Plan with priority habitats being Lowland Heathland. Land to the west of the Borough is categorised as central farmland with priority habitats being hedgerows, arable field margins, lowland meadows and rivers

The historic environment offers many opportunities for the Borough, through increased visitor use and sense of character. It will be important that such environments are also protected and where possible enhanced. Heritage assets are made up of Listed Buildings, Conservation Areas, Scheduled Ancient Monuments and include the Historic Environment Record.

### What are the main sustainability issues for Stafford Borough?

Below is a list of the key sustainability issues:

<b>Social Issues</b>
High levels of deprivation in some areas of the Borough
Low level of provision of affordable housing compared with rising house prices
Lack of access to services and facilities in some parts of the Borough
Slight increase in number of homeless households in recent years
The level of outdoor space provision is much lower than the national target
Ageing population across the Borough and need to ensure that their needs are catered for in terms of housing, access and healthcare
<b>Economic issues</b>
Decline in manufacturing industry resulting in job losses
Opportunities for tourist related economy
Slight increase in VAT business start ups in Stafford Borough
Decline in agricultural industries

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<b>Social Issues</b>
Vacant units within the town centres
Graduates moving out of area once finished studies
<b>Environmental Issues</b>
Loss of biodiversity habitats
Quality of SSSI's is important, but still below the national target
Whilst river biology and chemistry have improved over the last decade, both are still below the national average
High percentage of new homes have been delivered on previously developed land in last 10 years
Stafford Borough's Biomass energy project will provide renewable energy and opportunities for further renewable energy development in the future
Protection and adaptation of heritage assets
Loss of Individual character for Stafford Borough's settlements

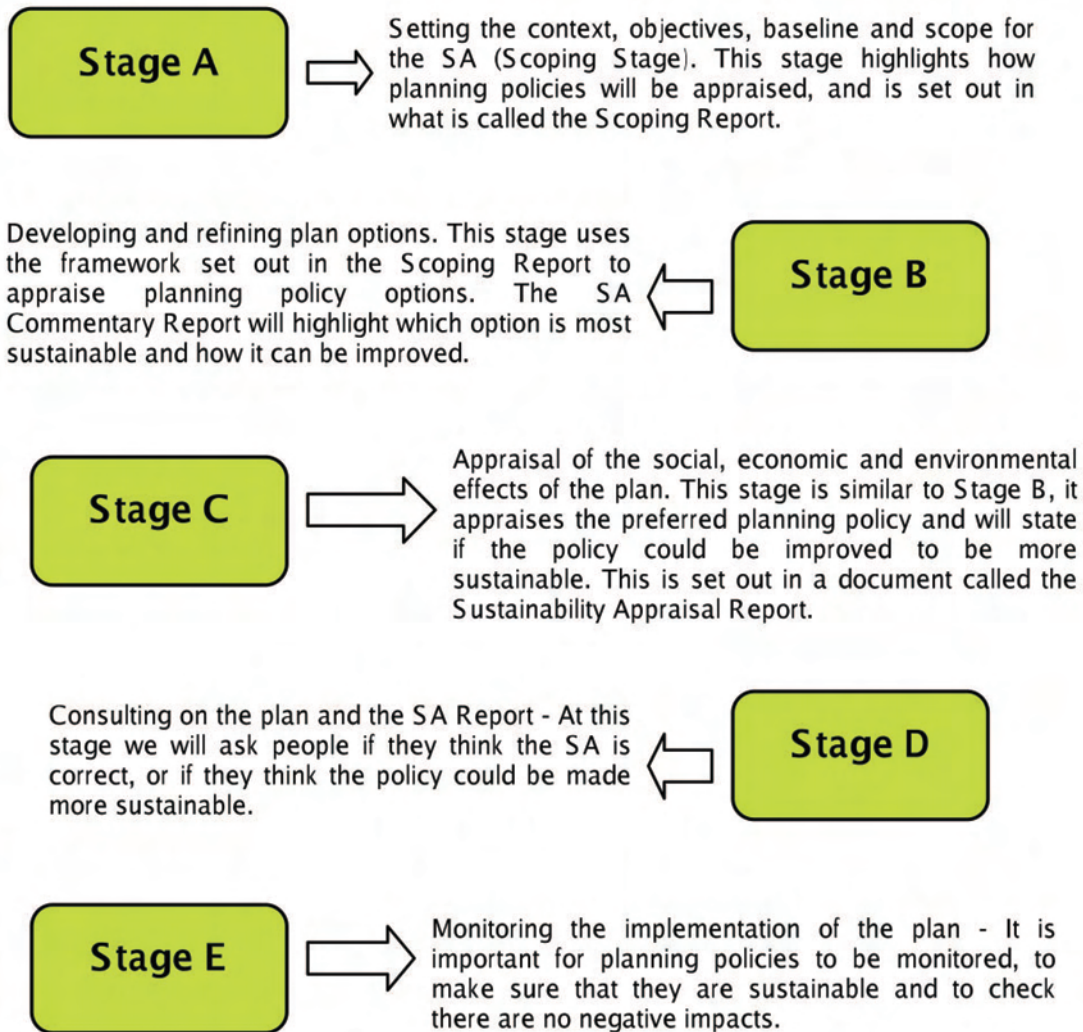
### Review of other plans, policies and programmes

The Plan for Stafford Borough is affected by and will itself influence a wide range of other plans and programmes at a national, regional and local level. The Scoping Report contains a full review of relevant plans and programmes and details how they interact in the development of the Plan and the preparation of SA Objectives. An updated review is contained in section 3 of the Revised SA Report.

### What are the main stages of Sustainability Appraisal?

There are 5 stages to the SA process. This is a Revised Sustainability Appraisal Report, which covers stages C and D.





## What is the Sustainability Appraisal Framework?

The Sustainability Appraisal Framework is what will be used to appraise planning policies and strategies. The framework is made up of objectives, indicators and targets tailored to the key sustainability issues for Stafford Borough. Planning policies are looked at under these targets and indicators in order to understand how they will contribute towards the sustainable development of the Borough. The Sustainability Appraisal Objectives are listed below:

### ECONOMIC OBJECTIVES

1. To create high, stable and equitable levels of employment
2. To ensure high and stable levels of economic diversity and competitiveness that recognises social and environmental issues
3. To sustain the vitality and viability of Stafford Borough's towns and villages, and their communities
4. To support the needs of the local rural economy and communities
5. To reduce vulnerability to the effects of climate change such as risk of flooding, on public well-being, the economy and the environment.

### SOCIAL OBJECTIVES

6. To ensure that everyone has the opportunity of a decent and affordable home
7. To improve opportunities for access for all to work, education, health and local services

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8. To reduce and prevent crime, and reduce the fear of crime
9. To reduce the impact of noise and light pollution
10. To improve health, safety and well-being across the whole community

### **ENVIRONMENTAL OBJECTIVES**

11. To reduce societal contributions to climate change
12. To protect and enhance biodiversity
13. To protect and conserve soil
14. To protect and enhance water quality of the Borough's rivers whilst maximising their carrying capacity and achieving sustainable water resource management.
15. To protect, enhance and, where necessary, restore designated landscape areas and town character, scenic beauty, local distinctiveness, and historic and cultural character.C

### **COMMUNITY OBJECTIVES**

16. To create a sense of community identity and belonging
17. To ensure tolerance, respect and engagement with people from different cultures, backgrounds and beliefs recognising their rights and responsibilities
18. To ensure that all individuals and groups in society have the opportunity to effectively engage in issues relating to their community
19. To encourage a strong, inclusive, community and voluntary sector
20. To engender a sense of civic and neighbourhood values, responsibility and pride

### **Who was Consulted?**

Public involvement through consultation is a key element of SA. The SEA Regulations set out specific requirements for consultation with the Statutory Environmental Bodies, as well as the public and other 'interested parties'. Statutory Environmental Bodies are:

- Natural England
- English Heritage
- The Environment Agency

Detailed comments received are included in Appendices 2.

### **What does the Revised SA Report contain?**

The Revised SA Report contains the following:

- An outline of contents, the methodology and description of the SA process and the specific SA tasks undertaken (Section 2 and Section 4).
- A review of other plans and programmes and relationship to The Plan for Stafford Borough (Section 3)
- A description of the environmental and sustainability context (Section 3)
- A summary of key sustainability issues (Section 3)
- The SEA/SA Framework which sets out the SEA/SA objectives for assessing The Plan for Stafford Borough (Section 4)
- A review of the options set out in previous consultations (Appendices 1 section v)
- A review of the policies and proposals in The Plan for Stafford Borough - Publication (Appendices 1 section i)

## How has SA influenced the Plan?

Sustainability Appraisal has played an integral role in shaping the Plan for Stafford Borough.

SA has assisted with the identification of sustainable options, taking into account the likely social, environmental and economic effects of implementing the different strategic alternatives. The process has helped to illustrate how policies and objectives could be made more sustainable and flagged up issues relating to specific locations early in the planning process. Below is a summary of how SA has shaped the Plan:

<b>Sustainability Appraisal Scoping Report</b>	Set out how policies will be appraised, set out baseline data and drew out key economic, social and environmental issues for the Borough
<b>Sustainability Appraisal Commentary Volume 1</b>	Appraised 6 broad development strategies providing recommendations and comparing the options to a 'business as usual' approach.
<b>Sustainability Appraisal Commentary Volume 2</b>	This document appraised the plan objectives and specific location options for future development.
<b>Sustainability Appraisal Report</b>	This document appraised the Core Policies, Development Management Policies, Development Strategy and Strategic Development Locations set out in The Plan for Stafford Borough- Draft Publication
<b>Sustainability Appraisal of Strategic Policy Choices</b>	Following the intended abolition of the Regional Spatial Strategy and the replacement of Planning Policy Statements with the National Planning Policy Framework, the Strategic Policy Choices set out various options for consideration before The Plan for Stafford Borough was published. The options included three options for the level of development, three options for the settlement hierarchy, two options for an affordable housing policy and two options for delivery of the strategy which were appraised.

## What alternative options were considered during the preparation of The Plan for Stafford Borough?

During the preparation of The Plan for Stafford Borough, the following alternatives have been considered:

### Development Strategy

The Sustainability Appraisal Commentary Volume 1, January 2008, appraised the following 6 broad development strategy options set out in *The Plan for Stafford Borough - Borough Wide Development Strategy*:

- Option 1 - Stafford Focused
- Option 2 - Stafford & Stone Focused
- Option 3 - Stafford, Stone & Principal Settlements
- Option 4 - Stafford & Principal Settlements only
- Option 5 - Selected Settlement Growth Points
- Option 6 - Growth Distributed Widely
- 'Business as usual'

The Sustainability Appraisal Commentary Volume 2, February 2009, appraised broad location options set out in *Delivering The Plan for Stafford Borough: Issues and Options*. This document outlined broad location options for development in the following settlements and industrial areas:

- Stafford
- Stone

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- Eccleshall
- Gnosall
- Great Haywood
- Little Haywood & Colwich
- Hixon
- Weston
- Haughton
- Woodseaves
- Tittensor
- Yarnfield
- Ladfordfields Industrial Estate
- Raleigh Hall Industrial Estate
- Hixon Airfield Industrial Estate

### Strategic Policy Choices

Following the intended abolition of the Regional Spatial Strategy and the replacement of Planning Policy Statements with the National Planning Policy Framework, the Strategic Policy Choices set out varying options for consideration before The Plan for Stafford Borough was published. The options included three options for the level of development, three options for the settlement hierarchy, two options for an affordable housing policy and two options for delivery of the strategy. These options were appraised in the Strategic Policy Choices: Sustainability Appraisal, published May 2012.

The 10 policy choices were:

1. Provision at 500 new houses and 8 hectares of employment land per year
2. Reducing provision, for example to 250 new houses and 4 hectares of new employment land per year
3. Increasing provision, for example to 750 new houses and 12 hectares of employment per year
4. New development focused on the County Town of Stafford only
5. New development focused on the County Town of Stafford, the market town of Stone and either one or more of the Key Service Villages
6. New development distributed widely across the Borough to each of the Key Service Villages, cross border settlements and other identified settlements across the Borough as well as at Stafford and Stone
7. A policy of 30% across all areas of the Borough for affordable housing
8. Area specific affordable housing targets based on the evidence contained in the affordable housing viability assessment
9. Establishing a criteria based policy to guide where new development could take place
10. Establish the principle of development boundaries to identify where new development can take place either through Neighbourhood Plans or through a subsequent Site Allocations Document which would be subject to full public consultation

A discussion on the appraisal of the alternatives can be found in v 'Appraisal of alternatives' and vi 'Appraisal of Alternative Strategy'.

### What are the effects of The Plan for Stafford Borough likely to be?

The Revised Sustainability Appraisal Report appraises The Plan for Stafford Borough - Publication document which includes the development strategy, strategic locations and a range of topic based policies. The assessment process will have a variety of positive effects, or at worst neutral or uncertain effects.

Potential positive impacts can be seen across all sustainability objectives. The Plan for Stafford Borough aims to encourage sustained economic prosperity and, where required, regeneration, paying particular attention to the interests of the Stafford town, which is a growth point and the County Town. Through the provision of affordable and specialist housing, there should be greater access to a home for local people and for an ageing population. The environmental and cultural character of the Borough will be protected and enhanced through the advocating of Green Infrastructure and the implementation of landscape, historic environment and nature conservation policies which will have multiple benefits.

The Plan for Stafford Borough will need to act in partnership with other strategies and stakeholders in the Borough to help deliver all the potential benefits, adjusting the approach, and reviewing policies if required, before the end of the plan period.

The Plan for Stafford Borough: Publication has included many of the recommendations set out in the previous SA Report. However the appraisal still identifies many uncertain effects. Uncertain effects are likely to be played out over the long term, giving the opportunity for monitoring and mitigation, such as working with service providers to offset the worst effects of change and reviewing policies. Proposals for monitoring can be found in the appendices. There are still further recommended word changes to the following policies:

- Policy Stafford 1: Stafford Town
- Policy Stafford 2: North of Stafford
- Policy E4: Raleigh Hall & Ladfordfields Recognised Industrial Estates
- Policy C2: Affordable Housing

The Revised Sustainability Appraisal Report includes discussion on the appraisal of alternative development strategy options and concludes that the strategy set out in The Plan for Stafford Borough is consistent with recommendations from previous Sustainability Appraisal documents.

### What could be done to make The Plan for Stafford Borough better?

The Sustainability Appraisal recommends changes to four policies, in order to make The Plan for Stafford Borough more effective. These changes relate to the following policies:

Policy	Nature of word changes
Policy Stafford 1: Stafford Town	Reference to be made to opportunities for low carbon networks including district heating solutions, townscape character and where practical and feasible optimises the use of brownfield land
Policy Stafford 2: North of Stafford	Reference to be made for the aim to provide a variety of employment types
Policy E4: Raleigh Hall & Ladfordfields Recognised Industrial Estates	Where they exist, development maximises the opportunities for low carbon networks
Policy C1 Dwelling Types and Sizes	To provide a proportion of lifetime homes standards

### How will the sustainability effects be monitored?

Legislation requires that the significant environmental effects of implementing a plan or programme should be monitored in order to identify at an early stage any unforeseen adverse effects, and to be able to undertake appropriate remedial action. The suggested monitoring regime includes:

- Determination of the scope of monitoring
- Identification of the necessary information
- Identification of existing sources of information
- General environmental monitoring
- Procedural integration of monitoring into the planning system
- Taking remedial action

Details of the monitoring framework can be found in Section 6 of the Revised SA Report.

### Next Steps

The results of this Revised Sustainability Appraisal Report along with the results from representations on soundness will be fed back into any changes to the plan. A revised final Sustainability Appraisal will be prepared and submitted alongside the plan and any changes will be set out the final approach to the Policies, Development Strategy and the strategic locations for growth. These will be appraised prior to being submitted to the Secretary of State, before they are considered in an examination.

## Where can I find out more about the Sustainability Appraisal?

The publication of this Non Technical Summary and the Revised SA Report allows the public to comment on the content of both The Plan for Stafford Borough - Publication, The Revised SA Report and the Habitat Regulations Assessment documents. These documents are available to view on the Authority's website at:

[www.staffordbc.gov.uk](http://www.staffordbc.gov.uk)

Your views on this Revised SA report are welcomed. We will need your response to be returned no later than 12 noon on Thursday 28th February 2013.

Please return your comments to:

Director of Planning & Sustainable Development

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Riverside

Stafford

ST16 3AQ

E-mail: [forwardplanning@staffordbc.gov.uk](mailto:forwardplanning@staffordbc.gov.uk)

If you have any queries, please contact us on: 01785 619591



## Glossary

<b>Accessibility</b>	The ease with which facilities of any kind can be reached by people wishing to use them.
<b>Adverse Impact</b>	Where a development / policy would result in harmful effects.
<b>Affordable Housing</b>	Low cost market housing and subsidised housing irrespective of tenure, ownership or financial arrangements, available to people who cannot afford to rent or buy houses generally available on the open market.
<b>Agricultural Land Classification</b>	Classification of land by DEFRA (Department of the Environment, Food and Rural Affairs) according to quality. The quality of agricultural land is based on the extent to which its physical or chemical characteristics impose long term limitations on the agricultural use of the land for food production. The scale ranges from 1 (excellent) to 5 (uncultivated land suitable for rough grazing only) with the best and most versatile falling within grades 1, 2 and 3a.
<b>Air Quality Management Area</b>	Areas identified as being unlikely to meet National Air Quality Objectives set out in the National Air Quality Strategy
<b>Alternative</b>	One of two or more possibilities / options / courses of action.
<b>Amenity</b>	The perceived value and pleasant features of space and place.
<b>Amenity Uses</b>	Uses such as open space, which contribute to the pleasantness of place and quality of life of an area.
<b>Area of Outstanding Natural Beauty (AONB)</b>	Locations with statutory national landscape designation to provide special protection of the area's natural beauty. These are designated by the Countryside Agency.
<b>Baseline Data</b>	The data is used as a reference with which to compare future observations or results.
<b>Biodiversity</b>	The richness and variety of living things (i.e. plants, birds, animals, fish and insects etc.), which exist in a given area, and the habitats that support them.
<b>Community Plan</b>	A Plan or Strategy for enhancing the quality of life of the local community which each local authority has a duty to prepare under the Local Government Act 2000. The plan is developed and implemented by the Local Strategic Partnership.
<b>Compensate</b>	To make satisfactory payment, reparation or substitution in exchange for something that has been lost or damaged or for some inconvenience.
<b>Conservation Area</b>	An area of special architectural or historic interest, the character and appearance of which it is desirable to preserve or enhance. Within a Conservation Area there are special controls over development and the felling of trees.
<b>Consultation Body</b>	Authorities which because of their environmental responsibilities are likely to be concerned by effects of implementing plans and programmes and must be consulted at specific stages of the SEA. The Consultation Bodies designated in the SEA regulations are the Countryside Agency, English Heritage, English Nature and the Environment Agency.
<b>Contaminated Land</b>	Land that is polluted by virtue of past industrial and chemical uses or naturally occurring radiation, which makes it unsuitable for development without decontamination taking place to remove potential hazards to occupiers and potential users of the development.
<b>Countryside Character Areas</b>	Areas of distinctive landscape, wildlife and natural features as defined by the Countryside Agency.
<b>Cultural heritage</b>	Places or things that are valued because they give us a sense of the past and of our cultural identity.
<b>Cumulative Effects</b>	These effects can be caused by a number of developments which, individually and in themselves, may have insignificant effects, but together combine to create a significant effect.

## Glossary

<b>DEFRA</b>	Department of the Environment, Food and Rural Affairs, responsible for promoting sustainable development, protecting and improving rural, urban, marine and the global environment.
<b>Derelict Land</b>	Land that has been previously developed but has been allowed to fall into disrepair and is no longer used.
<b>Economic Development</b>	The development of the economy of the Council area by the creation of employment opportunities.
<b>Environmental Assets</b>	All environmental assets that provide ecosystem services, e.g. landscape, habitats, pollination, erosion prevention, and the absorption of emissions and pollutants resulting from human activities.
<b>Environmental Capital</b>	The combination of the assets (i.e. the tangible commodities, land, trees, fields, etc.) with the environmental benefits derived from them (leisure opportunities, tranquility, natural habitats etc.)
<b>Environmental Limits</b>	The limit to which an environment or ecosystem can cope with the population, resource exploitation and pollution pressures placed on it. Beyond the environmental limit, there is a risk of causing long-term damage to the health and productivity of an environment.
<b>Environmental Report</b>	A document required by the SEA Directive, as part of an environmental assessment, that identifies, describes and evaluates the likely effects on the environment of implementing a plan or programme.
<b>Fauna</b>	All the animal life of a given place or time.
<b>Flora</b>	All the plant life of a given place or time.
<b>Green Belt</b>	Land designated in development plans to be kept open in accordance with PPG2.
<b>Greenfield Sites</b>	Land that has never been built on, usually grassland, farmland or heath.
<b>Habitat</b>	A site or areas inhabited by wild flora and fauna upon which they are reliant for their continued free existence.
<b>Heritage</b>	Things of value inherited or passed on from generation to generation, qualities which are worthwhile to preserve for prosperity.
<b>Historic Parks and Gardens</b>	Parks or gardens of special historic interest.
<b>Indicator</b>	Measure of variables over time, often used to measure achievement of objectives.
<b>Indirect (Secondary) Effects</b>	Effects which are not a direct result of the plan, often produced away from or as a result of a complex pathway
<b>Information and Communication Technologies (ICT)</b>	Telephone, computing and other technology designed to enable Communications Technology remote working and communication.
<b>Infrastructure</b>	Roads, sewers, drainage and the availability of energy supplies at the most basic level, through to social infrastructure such as schools and community centres.
<b>Listed Building</b>	A building contained in a list of buildings of special architectural or historic interest prepared by the Secretary of State for the Culture, Media and Sport (under Section 1 of the Town and Country Planning Act 1990).
<b>Local Nature Reserve</b>	Sites established by the Local Authority which can make a valuable contribution to nature conservation, local wildlife or geological interest, providing opportunities for education and enjoyment at the local level.
<b>Local Transport Plan</b>	Plan prepared by Staffordshire County Council detailing transport priorities and actions to be taken.
<b>Local Need</b>	Anticipated requirements (e.g. for housing) generated by local growth or other (e.g. demographic) trends. This specifically excludes demands generated by inward migration.



<b>Modal Split</b>	The proportion of people travelling by different types of transport.
<b>Mitigate</b>	To alleviate or to moderate a quality or condition that is harmful or unpleasant (e.g. pollution)
<b>Mitigation Measures</b>	Measures designed and intended to reduce adverse environmental effects that cannot be avoided.
<b>National Nature Reserve (NNR)</b>	An area of national / international importance for nature conservation and managed in accordance with a nature reserve agreement.
<b>National Playing Fields Association (NPFA)</b>	A charity where the aim is to acquire, protect and improve playing fields and other recreational space for the community.
<b>Net Gain</b>	The useful and/or positive benefits remaining after all deductions have been made.
<b>Non-statutory Designations</b>	A designation not enacted, created, or regulated by statute.
<b>Objective</b>	A statement of what is intended, specifying the desired direction of change in trends.
<b>Planning Policy Guidance (PPG)</b>	A series of notes issued by the Government, setting out policy guidance on different aspects of planning. Local Planning Authorities must take their content into account in preparing their LDF.
<b>Precautionary Principle</b>	The assumption that an activity or development might be damaging unless it can be proved otherwise.
<b>Previously Developed Land (PDL)</b>	Housing land that is or was occupied by a permanent structure (excluding agricultural or forestry buildings) and associated fixed surface structures. The definition covers the curtilage of the development.
<b>Public Transport Nodes</b>	Areas that offer greater accessibility by public transport and reduce reliance on the private car.
<b>Ramsar</b>	A wetland site designated under the European Ramsar Convention on Wetlands of International Importance.
<b>Reclaim/Re-use</b>	To regenerate, rescue or restore an area to bring it back into use.
<b>Regional Planning Guidance (RPG)</b>	Planning Guidance produced at a regional level to tackle issues of strategic importance that can be best dealt with over a larger area.
<b>Renewable Energy</b>	Energy flows that occur naturally and repeatedly in the environment (e.g. from sun, wind or wave or fall of water). Plant and some waste materials are also potential sources.
<b>Rural Diversification</b>	Engaging in new and different economic activity to strengthen the rural economy and support existing agricultural businesses and farm incomes.
<b>SEA Directive</b>	European Directive 2001/42/EC 'On the assessment of the effects of certain plans and programmes on the environment.'
<b>SEA Regulations</b>	<i>The Environmental Assessment of Plans and Programmes Regulations, 2004</i>
<b>Scoping</b>	The process of deciding the scope and level of detail of an SA, including sustainability effects and alternatives which need to be considered, the assessment methods to be used, and the structure and contents of the SA Report.
<b>Special Area of Conservation (SAC)</b>	A European designation for the conservation of sites of international conservation importance, designated under the European Directive on the Conservation of Natural Habitats and Wild Fauna and Flora.
<b>Special Needs Housing</b>	A segment of the housing market where a proportion of the housing is targeted or reserved for those people who require special housing requirements. It covers a spectrum of providers and tenures including housing association, joint ventures, public sector and owner occupation.

## Glossary

<b>Site of Biological Importance (SBI)</b>	A site of biological importance that is of county importance for its wildlife interest.
<b>Site of Special Scientific Interest (SSSI)</b>	A protected area identified as being of national importance in terms of wildlife, flora, fauna, geological or physiological features. They represent irreplaceable parts of our natural heritage
<b>Special Protection Area (SPA)</b>	A European designation for the protection of wild birds, designated under the European Directive on the Conservation of Wild Birds.
<b>Standardised Mortality Ratio (SMR)</b>	Is the ratio of the actual number of deaths one would expect if the population had the same death rate as a standard population.
<b>Strategic Environmental Assessment (SEA)</b>	A tool for integrating environmental considerations into decision-making by ensuring that significant environmental effects of the decision are taken into account.
<b>Sustainability Appraisal (SA)</b>	Appraisals of plans, strategies and proposals to test them against the four broad objectives set out in the government's sustainable development strategy.
<b>Sustainable Development (SD)</b>	Development that meets the needs of the present without compromising the ability of future generations to meet their own needs (Brundtland 1987).
<b>Synergies</b>	The working of two things to produce an effect greater than the sum of their individual effects.
<b>Target</b>	An objective that seeks a specified desired end, stated usually within a specified time-scale.
<b>Unstable Land</b>	Land which by reason of geological conditions or man-made changes, is likely to be subject to movement or collapse, putting at risk life and developments located on or near it.

## 1 Introduction

**1.1** The purpose of a sustainability appraisal is to promote sustainable development by embedding sustainable development within policies and plans. Sustainable development is generally considered as development which meets the needs of the present without compromising the ability of future generations to meet their own needs.

**1.2** The NPPF, published in March 2012 defines sustainable development as:

*The purpose of the planning system is to contribute to the achievement of sustainable development. The policies in paragraphs 18 to 219, taken as a whole, constitute the Government's view of what sustainable development in England means in practice for the planning system.*

*There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles:*

- *an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;*
- *a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and*
- *an environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.*

**1.3** To be effective, Sustainability Appraisal must be fully integrated into the plan-making process. The SA appraises each stage of the development plan's production and audits key policy decisions. Sustainability Appraisal will monitor the effectiveness of the plan during its implementation in order to inform future revisions.

**1.4** The requirement to undertake a sustainability appraisal, which in this instance also incorporates the Strategic Environmental Assessment, arises from both Government guidance and from European Directive.

**1.5** This Sustainability Appraisal Report accompanies The Plan for Stafford Borough - Publication. The requirements of the Government Guidance and the European Directive have been taken into consideration in the preparation of this appraisal. Whilst a Strategic Environmental Assessment and a Sustainability Appraisal are two separate requirements, they are referred to as SA for the remainder of this document.

**1.6** The objective of the Strategic Environmental Assessment (SEA) Directive is:

“to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans . . . with a view to promoting sustainable development”.<sup>(1)</sup>

**1.7** The full title of the European Community Directive is ‘Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effect of certain plans and programmes on the environment’. However for the sake of brevity, this SA report will refer to the Directive as the SEA Directive.

**1.8** The objectives of the Strategic Environmental Assessment (SEA) Directive are:

- Identifying strategic alternatives;
- Collecting baseline environmental information;
- More thorough prediction of significant environmental effects;
- Greater consultation of the public and statutory environmental agencies;
- Addressing and monitoring the significant environmental effects of the plan.

**1.9** The SEA Directive defines environmental assessment as a procedure comprising of:

- Preparing an environmental report on the likely significant effects;
- Preparing an environmental report on the likely significant effects of the draft plan;
- Carrying out consultation on the draft plan and the accompanying environmental report;

1 (Defra, 2005)

## 1 Introduction

- Taking into account the environmental report and the results of consultation in decision making; and
- Providing information when the plan is adopted and showing how the results of the SEA have been taken into account.

**1.10** The main difference between Strategic Environmental Assessment (SEA) and Sustainability Appraisal (SA) is that SEA is focused primarily on environmental effects, whilst SA incorporates the requirements of the SEA Directive and goes further by examining the social and economic impacts of the plan. Therefore, the SA process fully complies with the European Parliament's SEA Directive and the SEA Regulations prepared by the British Government.

**1.11** In March 2012, the Government published the National Planning Policy Framework, which replaced previous Planning Policy Statements and guidance notes. The requirement to carry out a Sustainability Appraisal and SEA remains unchanged.

**1.12** Quality assurance is an important element of the appraisal process. Quality assurance helps to ensure that the SEA requirements are met, highlighting any issues whilst carrying out the Sustainability Appraisal, and showing how effectively the appraisal has integrated sustainability considerations into the Core Strategy Development Plan Document process.

**1.13** The Environmental Report is a key requirement of the SEA Directive. The Environmental Report documents the whole SEA process and provides a record of how environmental considerations are incorporated into production of the DPD. The following table will be completed in the revised SA Report.

Table 1 Environmental Report: Compliance with the requirements of the SEA Directive

Requirements of the SEA Directive	Where met in the Sustainability Report
Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated. The information to be given is (Art. 5 and Annex 1):	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes.	Section 2.7 and Section 3
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	Section 3.1 and Technical appendices
c) The environmental characteristics of areas likely to be significantly affected.	Technical Appendices
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.	Section 3, Appendices 2 v
e) The environmental protection objectives established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation.	Section 3
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects).	Appendices 1 i and iv
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.	Appendices 1 i Section 6
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.	Appendices 1 v and vi
i) A description of measures envisaged concerning monitoring in accordance with Art. 10.	Section 6.1

Requirements of the SEA Directive	Where met in the Sustainability Report
j) A non-technical summary of the information provided under the above headings.	Non technical summary
The report shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (Art. 5.2).	Technical appendices and Section 4.1
Consultation: authorities with environmental responsibility, when deciding on the scope and level of detail of the information which must be included in the environmental/sustainability appraisal report (Art. 5.4)	Appendices 2 vii
authorities with environmental, social or economic responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental / sustainability appraisal report before the adoption of the plan or programme (Art. 6.1, 6.2)	Appendices 2 vii
other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Art. 7).	Not applicable
Taking the environmental/ sustainability appraisal report and the results of the consultations into account in decision-making (Art. 8)	Appendices 2 vii Appendices 1 v and vi
When the plan or programme is adopted, the public and any countries consulted under Art.7 must be informed and the following made available to those so informed:  • the plan or programme as adopted  • a statement summarising how environmental, social and economic considerations have been integrated into the plan or programme and how the environmental/sustainability appraisal report of Article 5, the opinions expressed pursuant to Article 6 and the results of consultations entered into pursuant to Art. 7 have been taken into account in accordance with Art. 8, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and  • the measures decided concerning monitoring (Art. 9)	Not yet reached
Monitoring of the significant environmental, social and economic effects of the plan's or programme's implementation (Art. 10)	Not yet reached
Quality assurance: environmental/sustainability appraisal reports should be of a sufficient standard to meet the requirements of the SEA Directive	Section 1

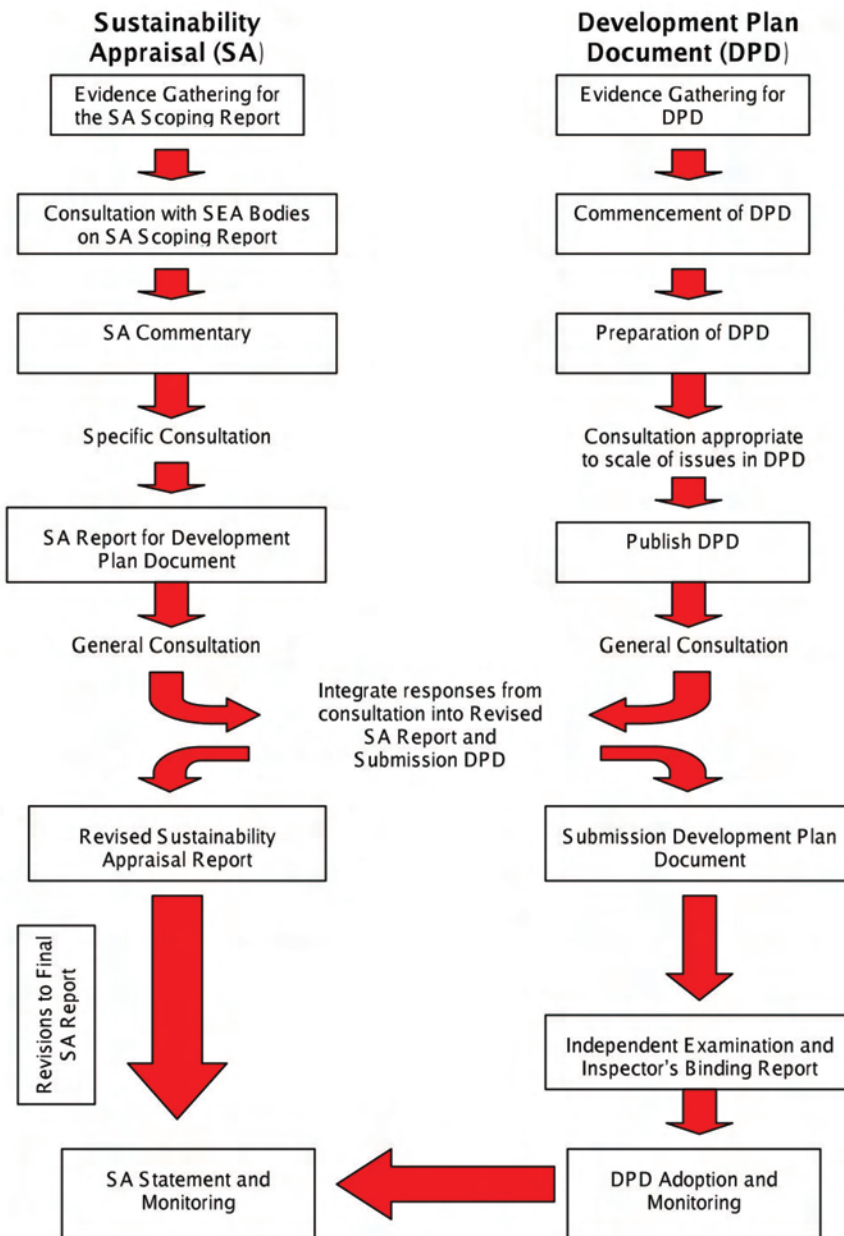
# 1 Introduction

## 2 Sustainability Appraisal and the Development Plan Document process

**2.1** It has been normal practice for those preparing and commenting on development plans to consider their likely environmental effects. Therefore the principle of assessing the environmental consequences of plans is not new. However, what the SEA Directive and SA process require is the use of an explicit and systematic method to comprehensively, impartially identify, and assess the environmental consequences of the development plan.

**2.2** The method for completing a SA on a Development Plan Document (DPD) involves the process outlined below. Although the approach is presented as a sequence, relevant objectives, policies and proposals may be re-examined in light of the information gathered through the SA process and in associated consultations. The consultation and submission of both the Revised Sustainability Appraisal Report and The Plan for Stafford Borough will take place at the same time.

Sustainability Appraisal and the Development Plan process





## 2 Sustainability Appraisal and the Development Plan Document process

**2.3** The Government has designated the Environment Agency, Natural England and English Heritage as 'authorities with environmental responsibilities' through the Environmental Assessment of Plans and Programmes Regulations 2004. These agencies have been consulted by Stafford Borough Council on the content of each Sustainability Appraisal stage. Other agencies have also been consulted to provide feedback on aspects of the SA Report. A full list of those who responded and the nature of responses received at each stage can be found in Appendices 2.

**2.4** Below sets out a brief description of each Sustainability Appraisal Stage. A detailed description of the appraisal of options and reasons for choosing and discounting options can be found in v 'Appraisal of alternatives'.

### 2.1 Scoping Report

**2.5** The Sustainability Appraisal Scoping Report was published for consultation in October 2007.

**2.6** The document explained the purpose of SA, set out the stages of SA, established the baseline data and outlined the SA framework that will be used to inform the SA of Development Plan Documents.

**2.7** Some minor amendments were made to the content of the SA process in light of comments submitted. In particular the following changes were made:

- Additional baseline data
- Rewording of sustainability indicators and targets
- Considering additional plans, policies and programmes

### 2.2 Developing the DPD Options

**2.8** The Sustainability Appraisal Commentaries and this SA Report cover the second stage of the Sustainability Appraisal process, Stage B2 – Developing the DPD Options. The SA Report outlines:

- The strategic options considered and how they were identified; and
- Comparison of the social, environmental and economic effects of the options.

**2.9** Various development strategy options have been developed during the preparation of the Core Strategy DPD. The preparation of these strategy options have been assessed, using the Sustainability Appraisal process, to measure performance in terms of sustainability by considering all economic, social and environmental factors.

**2.10** The effects of a policy option can only be understood by comparing it with a state, an option or an objective. The table below sets out the broad alternatives for each policy topic area. This process has informed the preparation of policy topic options. Furthermore, the SA assessment has also considered the timescale and significance of the effect.

Table 2 Broad alternatives for each policy

Topic Area	Development Strategy
Obviation	<ul style="list-style-type: none"> <li>• Do not allow any more development regardless of need</li> <li>• Do not allow any more development regardless of demand</li> <li>• Allow development regardless of need</li> <li>• Bring forward development that reduces the necessity for future growth to service the new development</li> <li>• Bring forward development that encourages the necessity for future growth to service the new development</li> </ul>
Mode / Process	<ul style="list-style-type: none"> <li>• Do not allow any type of development</li> <li>• Encourage any type of development</li> <li>• Unconventional layout of development only</li> <li>• Traditional layout of development only</li> <li>• Energy efficient and renewable layout of development only</li> <li>• High quality design any layout of development to limit impact</li> <li>• Conventional design and layout of development regardless of impact</li> <li>• High density of development</li> <li>• Low density of development</li> <li>• Infill and previously developed land development</li> <li>• Greenfield development</li> </ul>



## Sustainability Appraisal and the Development Plan Document process 2

Topic Area	Development Strategy
	<ul style="list-style-type: none"> <li>• Large scale developments</li> <li>• Small scale developments</li> <li>• Least intrusive development</li> <li>• More intrusive development</li> <li>• Mitigate impact of development layout close to designated sites</li> <li>• No mitigation of impact of development layout for designated sites</li> <li>• Building reuse, conversion over new build</li> </ul>
Location	<ul style="list-style-type: none"> <li>• Within existing settlements of Stafford and Stone</li> <li>• On the edge of Stafford and Stone</li> <li>• Within existing range of settlements</li> <li>• On the edge of the existing range of settlements</li> <li>• Within the rural areas</li> <li>• Near residential areas</li> <li>• Away from residential areas</li> <li>• Near to industrial areas</li> <li>• Away from industrial areas</li> <li>• Near to existing infrastructure</li> <li>• Away from existing infrastructure</li> <li>• Near to the strategic road network</li> <li>• Away from the strategic road network</li> <li>• Near to the rail and other forms of public transport</li> <li>• Away from rail and other forms of public transport</li> <li>• Within the Green Belt</li> <li>• Outside the Green Belt</li> <li>• Within or near the Cannock Chase AONB</li> <li>• Away from Cannock Chase AONB</li> <li>• Away from Sites of Special Scientific Interests</li> <li>• Within or near Sites of Special Scientific Interests</li> <li>• Away from floodplains</li> <li>• Within or near floodplains</li> <li>• Away from groundwater source protection zones</li> <li>• Within or near to groundwater source protection zones</li> <li>• Away from sites designated for the nature conservation importance</li> <li>• Within or near sites designated for the nature conservation importance</li> <li>• Away from sites of historic importance</li> <li>• Within or near to sites of historic importance</li> <li>• Away from sites of geological importance</li>   <li>• Within or near to sites of geological importance</li> </ul>
Implementation	<ul style="list-style-type: none"> <li>• Do not allow development at any time</li> <li>• Allow development to take place at any time</li> <li>• Allow development to take place immediately</li> <li>• Phase development throughout the Plan period</li> <li>• Phase development with an emphasis towards the start of the Plan period</li> <li>• Phase development with an emphasis towards the end of the Plan period</li> <li>• Unconventional construction of built development</li> <li>• Traditional construction of built development</li> <li>• Energy efficient and renewable construction of built development</li> <li>• High quality design development to limit impact</li> <li>• Conventional design development regardless of impact</li> <li>• High density of development</li> <li>• Low density of development</li> <li>• Inconspicuous site layout and construction of development</li> </ul>

## 2 Sustainability Appraisal and the Development Plan Document process

Topic Area	Development Strategy
	<ul style="list-style-type: none"> <li>• Conspicuous site layout and construction of development</li> <li>• Mitigate impact of built development close to designated sites</li> <li>• No mitigation of impact of built development for designated sites</li> <li>• Ensure all infrastructure, Section 106 agreements and planning conditions are in place prior to development coming forward</li> <li>• Ensure phased infrastructure, Section 106 agreements and planning conditions occurs as development comes forward</li> <li>• Only essential infrastructure to the site is required</li> <li>• Minimise noise and vibration levels during construction / usage</li> <li>• No account of noise and vibration levels during construction / usage</li> </ul>

### 2.3 Sustainability Appraisal Commentary Volume 1

**2.11** The SA Commentary Volume 1 appraised the following 6 broad development strategy options:

- Option 1 - Stafford Focused
- Option 2 - Stafford & Stone Focused
- Option 3 - Stafford, Stone & Principal Settlements
- Option 4 - Stafford & Principal Settlements only
- Option 5 - Selected Settlement Growth Points
- Option 6 - Growth Distributed Widely

**2.12** In addition a 'business as usual' approach was also appraised. Overall options 3 and 4 were identified as being the most sustainable choices for the development strategy, due to the sustainability of Stafford, Stone and the Principal Settlements.

**2.13** Recommendations included considering other settlements that were deemed as being sustainable in terms of services and facilities as part of the development strategy and the following policy recommendations:

- Housing type and tenure, including affordable housing and sustainable housing design
- Environmental protection and enhancement, including mitigation measures and green infrastructure
- Renewable Energy
- Employment provision
- Infrastructure including transport, water resources and community services and facilities

**2.14** Consultation took place on the SA Commentary Volume 1 in January and February 2008 with a total of 8 comments received. These comments made reference to the appraisal of the broad development strategy options, in particular the SA framework. As a result of these comments, the following changes were then incorporated into the Sustainability Appraisal process:

- Introduction of detailed decision making criteria alongside sustainability objectives, indicators and targets, in order to better illustrate how options are appraised and to provide a more detailed appraisal of each plan or policy option
- Updated baseline information and the addition of waste and recycling information to the technical appendices
- New and amended indicators and targets
- Inclusion of other plans and policies to be considered in the SA framework

### 2.4 Sustainability Appraisal Commentary Volume 2

**2.15** The Sustainability Appraisal Commentary Volume 2 appraised broad location options set out in The Plan for Stafford Borough: Issues and Options. This document outlined broad location options for development in the following settlements and industrial areas:

- Stafford
- Stone
- Eccleshall
- Gnosall
- Great Haywood
- Little Haywood & Colwich

## Sustainability Appraisal and the Development Plan Document process 2

- Hixon
- Weston
- Haughton
- Woodseaves
- Tittensor
- Yarnfield
- Ladfordfields Industrial Estate
- Raleigh Hall Industrial Estate
- Hixon Airfield Industrial Estate

**2.16** The SA Commentary Volume 2 suggested the following amended plan objectives:

### Stafford

1. An additional 7,000 new high quality homes will be provided by 2026 to create new communities supported by district centres, three new health centres including GP surgeries, new primary schools in housing developments of more than 1,000 homes and mitigation against any adverse impacts

2. An additional 90 hectares of premium employment land that mitigates against any adverse impacts, will be made available for new research and development facilities as well as growth opportunities to provide new businesses for graduates

### Stone

1. Provide additional, new high quality homes that mitigate against any adverse impacts, and support the sustainable community without undermining urban regeneration initiatives in the North Staffordshire conurbation Provide an additional 20 hectares of new high quality employment land which mitigates against any adverse impacts to provide further support and opportunities for expansion to new and existing employers at Stone Business Park

### Selected rural settlements

1. Provide for high quality new housing development in selected settlements that considers the local character and is supported by new infrastructure provision and

2. Deliver sensitive additional facilities in settlements selected for growth to provide an improved level of local services appropriate to the settlement in keeping with the local character

**2.17** The SA Commentary Volume 2 identified that should all the development options in this document take place:

Total land area of all housing options	730.7 hectares
Total land area of all employment options	245.2 hectares
Total land area of all retail / office options	9.84 hectares
Number of sites using brownfield land	22
Number of sites using greenfield land	77
Number of sites within flood zone 3	8
Number of sites adjacent to flood zone 3	2
Number of sites within a Conservation Area	11

### Recommendations

**2.18** The SA Commentary Volume 2 made the following recommendations / development principles for all options:

- Specify materials to be used in the production of the development, with particular emphasis on waste re-use and recycling
- Specify waste arrangements after completion of development
- Specify on-site and where appropriate off-site supply of renewable energy / low carbon contributions

## 2 Sustainability Appraisal and the Development Plan Document process

- Green Infrastructure / biodiversity protection and enhancement to be in place before development begins
- Flood risk assessments to be produced for the relevant options
- Improvements in infrastructure where issues have been identified
- Mix of housing types and tenures for housing options
- Mix of employment uses where appropriate for employment options
- Design principles to ensure all development is in keeping with local character
- Transport assessment / evaluation of green travel plans for those options identified to increase transport

**2.19** Consultation took place on the SA Commentary Volume 2 in February - April 2009 with a total of 35 comments being received. These comments made reference to the appraisal of the broad locations options, the plan objectives and the SA framework. As a result of these comments the following changes have been incorporated into the SA process:

- Amendments to the decision making criteria
- Inclusion of other plans for consideration in the SA Framework
- Plan Objective recommendations

### 2.5 Sustainability Appraisal Report

**2.20** The Sustainability Appraisal Report appraised the development strategy, policies and strategic development locations set out in The Plan for Stafford Borough: Draft Publication. The document contained the following policies:

- Guiding Principles
- Spatial Strategy
- Stafford Town
- North of Stafford
- West of Stafford
- East of Stafford
- Stone Town
- West & South of Stone
- Areas outside Stafford & Stone
- New development in the countryside
- Planning Obligations
- Community Infrastructure Levy (CIL)
- Social Infrastructure
- Climate Change
- Low Carbon Sources & Renewable Energy
- The Natural Environment & Green Infrastructure
- Sites of National & Local Nature Conservation Importance
- Cannock Chase AONB
- Landscape Character
- Safeguarding the Integrity of European Sites
- Cannock Chase Special Area of Conservation
- Green Belt
- Re-use of buildings in the Green Belt
- Dwelling Types and Sizes
- Replacement Dwellings
- Extension to Dwellings
- Extensions to the Curtilage of Dwellings
- Housing Conversions and Subdivisions
- Non Residential Uses in Primarily Residential Areas
- Affordable Housing
- Rural Exception Housing
- Specialist Housing
- Provision for Gypsies, Travellers & Travelling Show-people
- Local Economy
- Development within and outside Recognised Industrial Estates
- Development of Higher / Further Education and Research Establishments and incubator units
- Potential 'Nuisance' Activities

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- Potential 'Nuisance' Activities
- Class A3, A4 & A5 Uses
- Primary & Secondary Retail Frontages
- Vacant and Upper Floors
- New retail and leisure development outside the defined town centres
- Tourism
- Re-use of Vacant Land and Buildings
- Canal Facilities and New Marinas
- New Development at Trentham Gardens Estate
- Design
- Historic Environment
- Open Space, Sport and Recreation
- Transport
- Parking and Manoeuvring Facilities
- Rights of Way

2.21 The assessment makes recommends changes to the wording of the following policies:

Table 3 Recommended policy changes from Sustainability Appraisal

Policy	Nature of word changes
Guiding Principles	Scale and range of housing and employment, consideration of fluvial and surface water flooding, reducing impact of development in terms of carbon emissions and support development in line with parish and/or neighbourhood plans
Spatial Strategy	Reference to consistency with other plan policies and demonstration of consultation with local communities
Stafford Town	Reference to environment quality overall not just in relation to tourism and flooding
Stone Town	Reference to environment quality overall not just in relation to tourism and flooding, upgrades to Pirehill wastewater treatment works, affordable housing and SUDS
Replacement Dwellings	Recycling materials and energy efficiency
Extensions to the curtilage of dwellings	Consideration of habitats
Development within and outside Recognised Industrial Estates	Consideration of development that supports services, facilities and works
Primary and Secondary Retail Frontages	Marketing of property as retail use
Vacant and Upper Floors	Policy to apply to all types of centres, not just Stafford and Stone town centres
New retail & leisure development outside the defined town centres	Use of previously developed land
Tourism	Inclusion of consideration on local amenity, low carbon development and the promotion of sustainable tourism
West and South of Stone	Addition of design and layout consideration aswell as requirement to provide SUDS
Areas outside Stafford and Stone	Low carbon development, open space to meet existing local need aswell as that associated with development, support works for infrastructure improvements, support building re use and previously developed land

## 2 Sustainability Appraisal and the Development Plan Document process

Policy	Nature of word changes
New development in the countryside	Habitat mitigation and enhancement
Planning obligations	Separating scale at which planning obligations apply to dwellings for urban and rural areas

**2.22** Consultation took place on the SA Report in September - October 2011 with a total of 2 comments being received. These comments made reference to the appraisal of the policies, reference to the Water Framework Directive and Habitat Regulations Assessment. As a result of these comments the following changes have been incorporated into the SA process:

- Amendments to the decision making criteria
- Inclusion of reference to Habitat Regulations Assessment, Water Framework Directive and Flood Risk Assessment

### 2.6 Sustainability Appraisal of the Strategic Policy Choices

**2.23** Following the intended abolition of the Regional Spatial Strategy and the replacement of Planning Policy Statements with the National Planning Policy Framework, the Strategic Policy Choices set out varying options for consideration before The Plan for Stafford Borough was published. These options were appraised in the Strategic Policy Choices: Sustainability Appraisal, published May 2012.

**2.24** The 10 policy choices were:

1. Provision at 500 new houses and 8 hectares of employment land per year
2. Reducing provision, for example to 250 new houses and 4 hectares of new employment land per year
3. Increasing provision, for example to 750 new houses and 12 hectares of employment per year
4. New development focused on the County Town of Stafford only
5. New development focused on the County Town of Stafford, the market town of Stone and either one or more of the Key Service Villages
6. New development distributed widely across the Borough to each of the Key Service Villages, cross border settlements and other identified settlements across the Borough as well as at Stafford and Stone
7. A policy of 30% across all areas of the Borough for affordable housing
8. Area specific affordable housing targets based on the evidence contained in the affordable housing viability assessment
9. Establishing a criteria based policy to guide where new development could take place
10. Establish the principle of development boundaries to identify where new development can take place either through Neighbourhood Plans or through a subsequent Site Allocations Document which would be subject to full public consultation

**2.25** The Sustainability Appraisal preferred Option 1 as the base for the development in line with household projections, along with the development strategy of development focused on the County Town of Stafford, the market town of Stone and either one or more of the key service villages. In terms of affordable housing, a combination of option 7 and 8 were favoured along with combination of option 9 and 10 as the mechanism for setting criteria for new development along with establishing settlement boundaries.

**2.26** Consultation took place on the Strategic Policy Choices - Sustainability Appraisal between May and July 2012 with a total of 16 comments being received. These comments made reference to the appraisal of the renewable energy policy, indirect effects on designated sites, decision making criteria for sustainability objectives 12 and 14, definition of sustainable development, heritage assets as a sustainability issue and reference to the Water Framework Directive and Habitat Regulations Assessment. As a result of these comments the following changes have been incorporated into the SA process:

- Amendments to the decision making criteria
- Inclusion of reference to Habitat Regulations Assessment, Water Framework Directive and Flood Risk Assessment
- Inclusion of heritage assets as a sustainability environmental issue
- Definition of sustainable development from national planning policy included in Revised SA Report

## 2.7 The Plan for Stafford Borough - Publication

**2.27** The Plan for Stafford Borough is the name of the new Local Plan. Local planning authorities must prepare a Local Plan which sets planning policies in a local authority area. These are very important when deciding planning applications. The Plan for Stafford Borough is the first part of the new Local Plan, which sets out the development strategy for Stafford Borough, identifies strategic locations and planning policies. The new Local Plan will also comprise the following:

- Sites and Allocation Development Plan Document
- Neighbourhood Plans
- Supplementary Planning Documents

**2.28** The 'Plan for Stafford Borough - Publication' is a key stage in the formal process for producing the new Local Plan, officially known as the Proposed Submission Draft. It sets out the overall future direction for the area to deliver the strategic planning approach across the Stafford Borough area. The purpose of the document is to set out a vision, place-shaping objectives, targets and policies to make sure that new development meets local needs in line with national policy, whilst protecting and enhancing the existing high quality of life in the Borough. The Vision and Plan Objectives are outlined below:



## Spatial Vision

### **By 2031 Stafford Borough will have:**

- a. retained and enhanced its high quality unique character made up of the County Town of Stafford, the market town of Stone and extensive rural area containing smaller towns and historic villages;*
- b. provided high quality designed developments including recreation, open space and sport provision;*
- c. a range of housing types and tenures to meet the local needs of all communities and the ageing population, including affordable housing and provision for gypsies and travellers;*
- d. reduced the need to travel, through the provision of increased services and facilities in key locations to sustain the surrounding rural areas;*
- e. addressed issues of climate change, including a reduction of carbon emissions and flood risk with sensitively delivered renewable energy schemes;*
- f. Improved accessibility to services and facilities by providing safe, attractive and convenient sustainable connections from and to new developments;*
- g. been protected, conserved and enhanced to provide an exceptionally high quality of environmental, historic and landscape character;*
- h. community supported Neighbourhood Plans in place.*

### **By 2031 the County Town of Stafford will have:**

- i. provided an enhanced national and regional profile through major new housing and employment developments as the Growth Point, supported by a range of new infrastructure provision;*
- j. achieved a strengthened and diverse economy with high quality jobs, based on specialist industries, including Small & Medium-sized Enterprises (SMEs) and the Ministry of Defence;*
- k. increased educational attainment at all levels and retained high quality graduate skills delivered by further education facilities and bolstered by significant inward investment;*
- l. significant levels of high quality housing including affordable and specialist housing as well as extra care provision in recognition of an ageing population;*
- m. major town centre investments and exceptional levels of accessible community services and facilities;*

### **By 2031 the market town of Stone will have:**

- n. conserved and enhanced the local character of the town and its canal side vistas;*
- o. a vibrant local economy and community activities;*
- p. an increased mix of high quality residential developments supporting first class business development;*

### **By 2031 the Borough's Villages will have:**

- q. delivered a range of new housing at villages to provide for local needs;*
- r. increased the availability of accessible and enhanced high quality services and facilities, including public transport provision;*
- s. provided new green infrastructure / biodiversity enhancement schemes;*
- t. supported a diverse and regenerated rural economy;*



*The Borough will have a rich natural environment which is resilient to the effects of climate change, is well maintained and enhanced with more people enjoying the area through a greater sense of health and well being. A high quality strategic network of accessible green space will have been developed in and around Stafford, Stone and other areas as well as enhanced and managed historic environment and natural resources providing a clean, safe and enjoyable place to live and visit, facilitated by an improved road and public transport network.*

*The Cannock Chase Area of Outstanding Natural Beauty (AONB) and its setting, the Cannock Chase Special Area of Conservation (SAC), and the Green Belt areas within Stafford Borough will have benefited from a sustainable approach to strategic housing development. This approach will have been tailored to delivering accessible natural green-space for residents and workers, and will have maintained and enhanced the character of these important local resources' as well as their unique environmental qualities and openness.*

### Plan Objectives

#### Key Objectives - Stafford

1. Provide new high quality homes between 2011 - 2031 across of range of sites including accommodation for an ageing population and military personnel
2. Create new communities supported by district centres, open space, sport & recreation provision, new health centres including GP surgeries and new primary schools
3. Deliver mitigation measures against any significant adverse impacts on the Cannock Chase Special Area of Conservation
4. Avoid development in flood risk areas
5. Provide new high quality employment land between 2011 - 2031 across a range of sites that mitigates against adverse impacts, made available for new research and development facilities as well as growth opportunities to provide new businesses for graduate employment and inward investment to diversify the economy
6. Enhance existing, and provision of significant, new green infrastructure and habitats in the area through green links, such as the canal, from the surrounding open countryside and the Cannock Chase Area of Outstanding Natural Beauty into the heart of Stafford to encourage healthy living for leisure time activities, whilst safeguarding and enhancing the landscape setting
7. New open space, sport and recreational facilities, including indoor and outdoor provision, to meet the needs of an increasing population
8. Deliver major new mixed use town centre retail schemes to make Stafford a significant sub regional centre for retailing, leisure and cultural attractions
9. Provide new development at Stafford to encourage greater retention of high quality Further & Higher Education professionals in the area and up-skill educational attainments
10. Support the role of public sector organisations who have their headquarters or a significant presence in Stafford including Staffordshire University, Stafford College, Staffordshire Police, the Ministry of Defence, the Prison Service and Health Service co-ordination
11. Deliver the Western Access Improvement Scheme to improve the transport network to the west of Stafford town centre, deliver the Northern Access Improvement scheme and implement Phase 1 of the Eastern Distributor Road
12. Deliver the conservation and enhancement of Stafford's heritage assets, including the character and appearance of its conservation areas

#### Key Objectives - Stone

13. Provide new high quality homes in mix and tenure across a range of sites that mitigate against any adverse impacts and support the sustainable community
14. Deliver a new health centre for Stone as part of future community facilities
15. Provide new high quality employment land across a range of sites which mitigates against adverse impacts, made available for new research and development facilities, as well as growth opportunities to provide for expansion to new and existing businesses to diversify the economy
16. Provide infrastructure, including an upgraded electricity distribution network, new sewage facilities, green infrastructure links, enhanced public transport and new education provision through housing developments
17. Deliver new mixed use town centre proposals to enhance Stone as a centre providing for retail, leisure, canal based and community activities
18. New open space sport and recreational facilities including indoor and outdoor provision to meet the needs of the community

## Sustainability Appraisal and the Development Plan Document process 2

19. Safeguard and enhance the landscape setting through new green infrastructure provision and habitat creation including supporting the role of the Trent Valley corridor through the town in terms of biodiversity, accessibility, recreation and community uses

20. Conserve and enhance the historic character and heritage assets of Stone and secure the sustainable use and management of its historic buildings

#### Key Objectives - Areas outside of Stafford & Stone

21. Provide for high quality new small scale housing development at appropriate villages that reflects their distinctive local character

22. Deliver sensitive additional facilities to provide an improved level of local services appropriate to settlements, reduce the need to travel and be in keeping with the local character, the historic environment and the rural setting

23. Provide increased rural employment through agricultural and livestock businesses, renewable energy schemes, low impact hi-tech industries in agricultural buildings and sensitive new tourist attractions that enhance the high quality environment of the area

24. Deliver new employment land through the expansion of existing industrial areas

25. Provide new high quality homes, including new affordable homes, on appropriate sites in existing villages, to support sustainable rural communities in the future

26. Support increased habitat maintenance, restoration and creation, and the encouragement of a diverse range of species as part of the strategic green infrastructure network across the Stafford Borough area, whilst also protecting designated sites, including the Special Areas of Conservation

27. New open space, sport and recreational facilities to meet the needs of the community, including through increased multi-use provision such as community halls

28. Encourage the sustainable management of heritage assets, especially those identified as at risk, and deliver development which respects local character and distinctiveness

#### 2.29 The document contains the following policies:

<b>SP1</b>	Presumption in favour of sustainable development
<b>SP2</b>	Stafford Borough Housing and employment requirements
<b>SP3</b>	Stafford Borough Sustainable Settlement Hierarchy
<b>SP4</b>	Stafford Borough Housing Growth Distribution
<b>SP5</b>	Stafford Borough Employment Growth Distribution
<b>SP6</b>	Achieving Rural Sustainability
<b>SP7</b>	Supporting the Location of New Development
<b>Policy Stafford 1</b>	Stafford Town
<b>Policy Stafford 2</b>	North of Stafford
<b>Policy Stafford 3</b>	West of Stafford
<b>Policy Stafford 4</b>	East of Stafford
<b>Policy Stone 1</b>	Stone
<b>Policy Stone 1</b>	West and South of Stone
<b>E1</b>	Local Economy
<b>E2</b>	Achieving rural sustainability
<b>E3</b>	Development within recognised industrial estates
<b>E4</b>	Raleigh Hall and Ladfordfields Industrial Estates
<b>E5</b>	Major developed sites in the Green Belt
<b>E6</b>	Tourism
<b>E7</b>	Canal Facilities and new marinas
<b>E8</b>	Town, Local and Other Centres
<b>T1</b>	Transport
<b>T2</b>	Parking and Manoeuvring Facilities
<b>C1</b>	Dwelling types and sizes
<b>C2</b>	Affordable housing

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<b>C3</b>	Specialist housing
<b>C4</b>	Housing conversions and subdivisions
<b>C5</b>	Residential proposals outside the settlement hierarchy
<b>C6</b>	Provision for gypsies, travellers and travelling show-people
<b>C7</b>	Open space, sport and recreation
<b>N1</b>	Design
<b>N2</b>	Climate Change
<b>N3</b>	Low carbon sources and renewable energy
<b>N4</b>	The Natural Environment and Green Infrastructure
<b>N5</b>	Sites of European, National & Local Nature Conservation Importance
<b>N6</b>	Cannock Chase Special Area of Conservation (SAC)
<b>N7</b>	Cannock Chase AONB
<b>N8</b>	Landscape Character
<b>N9</b>	Historic Environment
<b>I1</b>	Infrastructure Delivery Policy

### 3 Baseline Characteristics and Plan and Programme Review

**3.1** Baseline data and sustainability issues were first presented in the Scoping Report. Below is an update to the sustainability issues and a description of Stafford Borough, drawing on key elements of the evidence base and baseline data. Baseline data can be viewed in more detail in the technical appendices which accompany this report.

**3.2** The requirements for baseline data vary widely, but it must be relevant to environmental, social and economic issues, be sensitive to change and should ideally relate to records which are sufficient to identify trends. Annex 1(f) of the SEA Directive requires data to be gathered on biodiversity, population, human health, flora, fauna, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the inter-relationship between the above factors.

**3.3** The baseline information collated in relation to Stafford Borough originally presented in the 2007 SA Scoping Report and this information has been re-presented below and updated where more recent data are available, using the following data sources:

#### Housing

- [The Housing Monitor: Land for New Homes](#) (2012)
- [North Housing Market Area Gypsy and Traveller Accommodation Needs Assessment](#) (2012)
- [Strategic Housing Land Availability Assessment \(SHLAA\)](#) (2012)
- [Housing Market Areas Assessment](#) (2012)
- [5 Year Housing Land Supply Statement](#) (2012)

#### Employment and the Economy

- [Employment Land Review](#) (2012)
- [National Land Use Database](#) (2012)

#### Retail / Town Centres

- [Town Centre Capacity Assessment \(Retail, Office and Leisure\)](#) and [appendices](#) (2011)

#### Community

- [Revised Settlement Assessment of Services and Facilities](#) (2012)
- [Key Stakeholder Discussions: Parish Meetings](#)
- [Parish Plans and Village Design Statements](#)

#### Transport

- [Draft Stafford Borough Transport Strategy](#) (2011)
- [Staffordshire Local Transport Plan](#) (2011)
- [Western Access Improvement Scheme](#) (2011)

#### Climate Change

- [The Strategic flood-risk assessment \(SFRA\) Prepared jointly alongside Lichfield District Council, Staffordshire Moorlands District Council and Tamworth Borough Council](#) (2008)
- [Water Cycle Study and Surface Water Management Plan](#) (2010)
- [Renewable Energy Study](#) (2010)

#### Tourism, leisure & recreation

- [Planning Policy Guidance Note 17 \(PPG17\) 'Planning for Open Space, Sport and Recreation' Assessment](#) (2009)

#### Environment & landscape

- [Green Infrastructure Strategy](#) (2009)
- [Landscape and Countryside Character Assessment](#) (2001)
- [Habitats Regulations Assessment \(Appropriate Assessment\)](#) (2009)
- [Stafford Borough Local Development Framework Ecological Desk Study](#) (2008)

## 3 Baseline Characteristics and Plan and Programme Review

- [Cannock Chase AONB Management Plan](#) (2009)
- [Staffordshire Biodiversity Action Plan](#) (2011)

### Historic Environment

- [Historic Environment Character Assessment for Stafford Town](#) (2009)
- [Historic Environment Character Assessment for Stone](#) (2009)
- [Historic Environment Character Assessment for Haywoods](#) (2009)
- [Historic Environment Character Assessment for Eccleshall](#) (2009)
- [Historic Environment Character Assessment for Gnosall](#) (2009)
- [Stafford Town Centre Conservation Area Appraisal](#) (2011)
- [Stone Conservation Area Appraisal](#) (2008)
- [Bradley Conservation Area Appraisal](#) (2012)

### Infrastructure

- [Stafford Borough Infrastructure Strategy: Stage 1 Final Report](#) (2009)
- [Stafford Borough Infrastructure Strategy: Stage 2 Final Report](#) (2012)
- [Key Stakeholder Discussions: Statutory Agencies & Utilities](#)
- [Water Cycle Study and Surface Water Management Plan](#) (2010)

### Other

- [Annual Monitoring Report](#) (2012)
- [Census Information](#) (2001 & 2011)
- [Statement of Community Involvement](#) (2006)
- [Local Development Scheme](#) (2012)

**3.4** Discussion of the evidence base and further baseline data, organised by SEA topic is set out in the Technical Appendix.

### General description

**3.5** Stafford Borough covers an area of over 230 square miles and is centrally placed within Staffordshire County. Staffordshire is a large County between the conurbations of Manchester, 50 miles to the north, and Birmingham, 30 miles to the south. The Borough shares boundaries with Newcastle-under-Lyme, Stoke-on-Trent, Staffordshire Moorlands, East Staffordshire, Lichfield, Cannock Chase, South Staffordshire, Telford and Wrekin and North Shropshire. Stafford Borough is well located within the West Midlands region and nationally in terms of the transport network.

**3.6** The Stafford Borough area is locally distinctive in terms of character, landscape and natural resources. The area is home to over 130,600 people (2011 Census). 60% of the population live in Stafford and Stone whilst the remainder live in the rural area where there are a number of larger villages such as Eccleshall, Gnosall, Hixon, Barlaston, Great Haywood and Little Haywood as well as smaller villages and hamlets. To the north of the Borough are parts of the suburban fringe of Newcastle-under-Lyme and Stoke-on-Trent at Clayton, Blythe Bridge, Trentham and Meir Heath. There are more than 50 villages and hamlets, which vary in size, from a population of over 3,500 at Gnosall to under 200 people at Adbaston.

### Issues - Economic

**3.7** Stafford Borough is strategically placed in the centre of Staffordshire with access to the M6 motorway and the West Coast mainline railway. Historically the Borough's economy has centred on traditional manufacturing industry, but in recent years such industries have undergone dramatic restructuring leading to job losses, de-industrialisation and considerable scaling back in levels of production, particularly in Stafford. This has had a significant impact on the local economy changing from predominantly manufacturing to more service based industries, with forecasts anticipating that this trend will continue in subsequent years. A result of these changes has also led to a loss of employment areas to housing development. Despite this Stafford has seen a slight increase in business growth in the last few years.

**3.8** There are concerns due to the lack of diversity in certain types of employment, with the majority of the workforce employed in public administration, health and education, and 20.6% of people employed in the distribution, hotel and restaurant sectors. Therefore one issue is to diversify and adapt the employment base to encourage emerging high technology and creative industries, using strengths such as the higher education and renewable energy sectors.

## Baseline Characteristics and Plan and Programme Review 3

**3.9** Stafford Borough has a low unemployment rate and the mean household income is above both the national and the West Midlands average.

**3.10** Much of the Borough is still agricultural and there are challenges in terms of alternative crops for renewable energy, changes in agricultural practises and development in the countryside.

**3.11** The tourism sector in the Borough offers many opportunities for the local economy through visits to Shugborough, the Ancient High House, Isaac Walton Cottage, Cannock Chase Country Park, Stafford Castle and the canal network.

**3.12** Stafford is the Borough's strategic town centre and a principal shopping destination. In recent years Stafford has begun to fall behind other competing centres across the region in terms of its retailing offer. The recent Town Centre Capacity Study showed that the number of vacant units (shops and offices) in the town centre are above the national average. The study also found that convenience shops and leisure opportunities are below the national average but comparison and retail service were above the national average.

### Social Issues

**3.13** Evidence highlights that Stafford Borough has a number of areas with deficiencies in quality and quantity of open space, sport and recreation provision, particularly in Stafford town and certain rural areas. This type of provision can significantly improve the quality of life for local communities through associated health, well-being and productivity benefits.

**3.14** The current demand for housing in Stafford Borough is high, caused by a combination of natural demographic change, an increased growth in single person households and inward migration from adjoining areas. Pressure on the local housing market has increased in recent years due to a rise in prices, with the average house price in Stafford, at 2011, being £182,616. In addition there is a lack of 2 and 3 bedroomed houses within the existing housing stock within Stafford Borough, particularly in Stone.

**3.15** Many groups are excluded from the housing market, in particular groups such as young people, single parent families and those on average local wages, due to the high cost of housing. The rural areas of Stafford Borough have experienced the most significant increase in house prices over recent years, creating pressure on rural communities with younger people being unable to afford the increased house prices. Whilst affordable housing has been provided over the years, this has not been consistent and is below identified needs.

**3.16** There is also a lack of provision to meet the identified needs of Gypsies and Travellers across the Borough, as identified in the Northern Housing Market Area Gypsy and Traveller Accommodation Needs Assessment (GTAA). A revised assessment is expected early 2013.

**3.17** In line with national trends the population demographic of Stafford Borough is ageing and by 2025 the projected numbers of people over 64 years of age is expected to increase by 49.4% to 34,800 people whilst the number of people aged over 85 years will almost double by to 95%. This raises issues for housing need and specialist housing including specially designed housing across Stafford Borough.

**3.18** Smaller settlements across the Borough such as Eccleshall, Gnosall, Great and Little Haywood provide more localised services and facilities for their communities. However in recent years a number of these centres have experienced a reduction in the range of services and facilities leading to greater car travel to other larger centres.

**3.19** Stafford Borough has a lower than average crime rate. However the general public continue to have a perceived fear of crime including anti-social behaviour, youth crime as well as drug and alcohol related problems. Design and layout of development can minimise opportunities for crime thereby ensuring that people feel safe.

**3.20** Previous consultations on the SA have reiterated the individual character of the towns and villages across the Borough, which has been identified as a sustainability issue.

**3.21** Stafford is not considered to be a deprived Borough in comparison with some parts of the country. However, there are significant levels of poverty and isolation in some parts of Stafford Borough, and some wards in Stafford Town are among the poorest in Staffordshire.

### Environmental Issues

**3.22** Climate change is now considered to be the greatest threat to our social well-being and economic future. The effects of Climate change such as extreme weather and greater risk of flooding are a real issue for the UK. Severe flood events caused extensive damage to Stafford town and extensive tracts of farmland in recent years.



### 3 Baseline Characteristics and Plan and Programme Review

**3.23** The renewable energy study identified renewable energy and low carbon opportunities across the Borough. In addition the Green Infrastructure study identified a network of green infrastructure and opportunities that can help combat the effects of climate change.

**3.24** Water quality, in terms of biological and chemical quality, is improving in rivers within the Borough but could improve further.

**3.25** The Borough has a rich and varied natural environment composed of a diverse range of wildlife sites and habitats, including seventeen Sites of Special Scientific Interest (SSSI), three Ramsar sites, four Special Areas of Conservation (SAC) and three National Nature Reserves. In addition there are more than a hundred sites identified locally as Sites of Biological Interest (SBIs). There has been decline in certain species and habitats across the Borough, along with the quality of some protected areas. The protection, enhancement, improvement and proper management of these sites is a key issue for the Stafford Borough. The Staffordshire Biodiversity Action Plan identifies land to the south east as the Cannock Chase Ecosystem Action Plan with priority habitats being Lowland Heathland. Land to the west of the Borough is categorised as central farmland with priority habitats being hedgerows, arable field margins, lowland meadows and rivers

**3.26** Stafford town has the Cannock Chase Area of Outstanding Natural Beauty, a Special Area of Conservation and Green Belt to the south east, which will need to be considered when appraising site allocations and the development strategy. In the last few years a high percentage of development has taken place on brownfield land. This results in less greenfield land being used for development. There can also be indirect effects on designated sites such as visitor pressure which also need to be considered.

**3.27** There are a number of European designated sites within the Borough, which require a separate assessment. More information can be found in Appendix 2.

**3.28** The historic environment offers many opportunities for the Borough, through increased visitor use and sense of character. It will be important that such environments are also protected and where possible enhanced. Heritage assets are made up of Listed Buildings, Conservation Areas, Scheduled Ancient Monuments and include the Historic Environment Record.

Table 4 List of relevant international, national, regional, county and local level plans and programmes that have been reviewed

**Johannesburg Declaration on Sustainable Development** - Key commitments from the declaration are: Sustainable production and consumption, renewable energy & energy efficiency, produce chemicals in ways that do not lead to significant adverse effects on human health and the environment and develop integrated water resources management and water efficiency plans. These elements are reflected in SA Objectives 11, 13 and 14.

**1992 Rio Declaration on Sustainable Development** - Set out the Precautionary Principle: 'Where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation. This is reflected in SA Objectives 11, 12, 13, 14 and 15.

**European Landscape Convention 2004** - The aim is to encourage public authorities to adopt policies and measures at local, regional, national and international level for protecting, managing and planning landscapes throughout Europe. This is reflected in SA Objective 15

**The UNECE Convention on Access to Information, Public Participation in Decision Making and Access to Justice for Environmental Matters (The Aarhus Convention) (2001)** - This Convention stated that everyone has the right to receive environmental information that is held by public organisations and public authorities are obliged to actively disseminate environmental information in their possession. The publication of each report produced for the Sustainability Process addresses this implication.

**EC Directive on the assessment of the effects of certain plans and programmes on the environment 2001/42/EC** - Ensure that environmental consequences of certain plans and programmes are identified and assessed during their preparation and before their adoption.

**The European Communities Directive 92/43/EEC**, on the Conservation of Natural and Semi-Natural Habitats and of Wild Fauna and Flora – The Habitats Directive (EU, 1992) The Habitats Directive 92/43/EEC The EU Habitats Directive is the cornerstone of Europe's nature conservation policy. The Directive takes into account endangered species and habitats on a European scale, and therefore not all of the species are relevant to the habitats and conditions expected to be found in the UK. Animals covered by European legislation include species of bat, newt, frog, butterfly



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and otter. Plants covered by European legislation include orchid, fern and marshwort. The Habitats Directive also designates areas as Special Areas of Conservation (SAC), due to the presence of protected species. Stafford Borough has 3 Special Areas of Conservation, The Cannock Chase, Chartley Moss and Salt Pasturefields. Motte Meadows Special Area of Conservation also lies adjacent to the Borough Boundary. This Directive has implications for the Plan for Stafford Borough and is a key issue. A brief discussion is set out in Appendices 2 section v. The EU Habitats Directive also requires a Habitats Regulation Assessment (HRA) to be undertaken in relation to proposed development.

The Birds Directive 2009/147/EC - The aim of the Directive is to prevent or avoid the destruction and pollution of bird habitats (of certain identified species) and designates Special Protection Areas. There are no SPAs in Stafford Borough.

**The Ramsar Convention - The Convention on Wetlands of International Importance**, called the Ramsar Convention, is an intergovernmental treaty that provides the framework for national action and international cooperation for the conservation and wise use of wetlands and their resources. Previous national planning policy stated that designated Ramsar sites should receive the same protection as Special Protection Areas and Special Areas of Conservation. There are two Ramsar sites in Stafford Borough including Aqualate Mere and Cop Mere. These have been addressed in the Habitat Regulations Assessment.

**The Water Framework Directive 2000/60/EC EU Water Framework Directive:** The Water Framework Directive, which came into force in 2000, established an integrated approach to the protection, improvement and sustainable use of Europe's rivers, lakes, estuaries, coastal waters and groundwater. The Directive sets objectives to protect particular uses of the water environment from the effects of pollution and to protect the water environment itself from especially dangerous chemical substances. The new objectives are broader ecological objectives, designed to protect and, where necessary, restore the structure and function of aquatic ecosystems themselves, and thereby safeguard the sustainable use of water resources. One of the requirements is that all watercourses should be of 'good' status, and in order to do this, whole catchments are to be considered. The Directive therefore introduces a river basin management planning system which will be the key mechanism for ensuring the integrated management of: groundwater; rivers; canals; lakes; reservoirs; estuaries and other brackish waters; coastal waters; and the water needs of terrestrial ecosystems that depend on groundwater, such as wetlands. The planning system is seen to provide the decision-making framework when setting environmental objectives, providing new opportunities for anyone to become actively involved in shaping the management of river basin districts and their neighbouring river catchments. Stafford Borough affects the large river basin of the Humber, and more directly the river catchments of the Sow and Penk.

**EU Directive 2009/28/EC:** Promotion of the use of energy from renewable sources - the UK has committed to sourcing 15% of its energy from renewable sources by 2020. This aim is addressed by SA Objective 11.

## National

**Rural Strategy 2004** - Recognises that flood risk will increase with climate change and increased development. It highlights the impact on both rural and urban areas. The Strategy also highlights the need for affordable housing that helps sustain mixed and viable rural communities. Stafford Borough is a largely rural Borough and so these aims are relevant. Planning policy supports this aim through specific provisions to provide affordable housing in small rural settlements.

**The Environment Agency Soil: A Precious Resource** - This document aims to protect soil in the built environment and states that a greater recognition is needed of the importance of green spaces in the urban environment, which provide leisure opportunities and help manage flood risk. There is also the need to address contaminated land, as this can pose a risk to water quality and deter re-development.

**Strategy for Sustainable Farming and Food (Defra, 2002)** - Respect and operate within the biological limits of natural resources (especially soil, water and biodiversity), achieve consistently high standards of environmental performance by reducing energy consumption, by minimising resource inputs, and use renewable energy wherever possible.

**DfT, Public Service Agreement** - Increase use of bus and light rail use By 2020, increase the use of public transport by more than 12% in England compared with 2000 levels, with growth in every region.

**UK Fuel Poverty Strategy** - Focuses primarily on measures to improve energy efficiency and reduce the costs of fuel for fuel poor households. The strategy aims to combat this by tackling poor energy efficiency in homes and low incomes. Other factors include the size of some properties in relation to the number of people living in them, and the cost of fuel.

### 3 Baseline Characteristics and Plan and Programme Review

**The Conservation of Habitats & Species Regulations 2010:** Species afforded protection by the Habitats Directive are also listed in 'The Conservation of Habitats & Species Regulations 2010 (UK).' The Regulations state the legislative provision for the management of protected sites and species, as well as enforcement powers.

**The Localism Act 2011:** The Localism Bill gained Royal Assent on 15th November 2011. The Localism Act is intended to shift power from central government back into the hands of individuals, communities and councils. A radical reform of the planning system provides for the abolition of Regional Spatial Strategies and returning decision-making powers on housing and planning to local councils.

Key provisions of the Localism Act which have particular relevance to the Local Plan are:

- The abolition of Regional Strategies (although this has not yet happened in relation to the West Midlands Spatial Strategy);
- Duty to Co-operate: this requires local authorities and other public bodies to work together on planning issues;
- Neighbourhood Planning: which allows communities to prepare their own plans which - if found sound, and supported by a majority referendum vote - would become part of the statutory Local Plan;
- Community Right to Build: which allows communities to bring forward development proposals in line with minimum criteria;
- Reforming the Community Infrastructure Levy (CIL)
- Reforming the way Local Plans are made.

**National Planning Policy Framework:** The new National Planning Policy Framework, which came into force in March 2012 is designed to stimulate development whilst keeping vital environmental protections. It focuses upon a 'presumption in favour of sustainable development' and is intended to streamline and simplify the planning system.

In terms of the presumption in favour of sustainable development the NPPF defines three key strands. These are:

- An economic role: contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
- A social role: supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being;
- An environmental role: contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

**The Town and Country Planning (Local Planning) (England) Regulations** came into force on 6th April 2012. These regulations set out the procedures which need to be followed in preparing a Local Plan (the regulations now refer to Local Plans rather than Local Development Frameworks). In terms of developing a sound Local Plan, the NPPF states that to be sound a Local Plan must be:

- Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is practical to do so consistently with the presumption in favour of sustainable development;
- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

**Climate Change Act 2008:** Introduced a statutory target of reducing carbon emissions by 80% by 2050 below 1990 levels, with an interim target of 34% by 2020. This is addressed in SA Objective 11.

**The Energy Act 2008:** Introduced powers for Feed-In Tariff (FiT) and the Renewable Heat Incentive (RHI) aimed at driving an increase in renewable energy capacity. These are operational from April 2010 and April 2011 respectively.

**Forestry Commission West Midlands Delivery Plan WE3** - To help new initiatives and share knowledge for creating a shared market. 10% renewables in new developments adopted as regional target; 25% LGA's with biomass installations by 2009. This is addressed in SA Objective 11. Renewable energy opportunities are identified as a key sustainability issue for Stafford Borough.

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**The Wildlife & Countryside Act 1982 (England and Wales) (Amendment) Regulations 2004:** The Act gives statutory protection to wild birds, their nests and eggs, certain wild plants, and animals including for example bats, great crested newts and some species of butterfly. The legislation also sets out the law for wildlife management, the introduction of native species and managing designated sites.

**Local Growth White Paper (October 2010):** This Paper set out the Governments approach to supporting economic growth in the regions. At the same time they also announced approval for an initial 24 Local Enterprise Partnership bid proposals (business and Local Authority partnerships for driving local economic growth). A Regional Growth Fund of £1.4 Billion over three years would be used to support economic growth in the regions. Following on from this was the formation of Local Enterprise Partnerships (LEPs). These followed on from the Government announcement that that Regional Development Agencies (RDAs) would be replaced with a new business support structure: LEP's bringing local councils and businesses closer together in order to boost enterprise and create jobs.

**Low Carbon Transition Plan: The 'low carbon transition plan' (LCTP) -** set out how the government was to meet its binding carbon targets, 80% by 2050 below 1990 levels (an interim target set at 34% by 2020). The LCTP also set individual carbon targets for the major UK government departments, which were in turn expected to produce their own individual plans. The LCTP set out how sectors including, power, homes, workplace, transport and farming can address working towards a lower carbon future. In terms of the workplace it aimed to cut emissions 13% on 2008 levels by 2020; to save around 500m tonnes of carbon dioxide a year across the EU by 2020, create 1.2m jobs in the low-carbon industry and invest approximately £120m in offshore wind, and an additional £60m in marine energy.

**River Catchment Management Plan -** The aims of the River Catchment Management Plans fit in to the wider aims of the larger River Basin Management Plans which have a multi purpose objective of both improving water quality in order to meet the targets of the EU Water Framework Directive, as well as improving the management of water ensuring greater resilience to drought and floods. Stafford Borough lies in the Staffordshire Trent Valley Catchment in the Humber River Basin Management Plan. The aims of these management plans must therefore be supported in local policy.

**High Speed Rail Link: Phase 1** of a high speed rail link has been approved by Government (10th January 2012). This will cost £17bn and will link London with Birmingham, joining the West Coast Main Line in the midlands. Detailed planning work has now also begun on the route options from Birmingham to Manchester and Leeds, to allow for consultation on these routes at the same time. The first phase of the project is scheduled to begin in 2017.

**Natural Environment and Rural Communities Act (NERC Act) 2006 -** Section 40 states that "Every public body must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity". When developing planning policies and making planning decisions, consideration of biodiversity must be given.

The Environment Agency has begun work on **River Catchment Management Plans**. The aims of the River Catchment Management Plans fit in to the wider aims of the larger River Basin Management Plans which have a multi purpose objective of both improving water quality in order to meet the targets of the EU Water Framework Directive, as well as improving the management of water ensuring greater resilience to drought and floods. The aims of these management plans must therefore be supported in local policy. Stafford falls in the Staffordshire Valley Catchment Plan and the Humber Basin Management Plan.

**UK Biodiversity Action Plan (UKBAP):** The UK Biodiversity Partnership runs the UKBAP which describes the biological resources of the UK and provides detailed plans for conservation of these resources, at national and devolved levels. Local Biodiversity Action Plans have been established throughout the country and the Staffordshire Biodiversity Action Plan is relevant to Stafford Borough with the identification of different types of Habitat areas in the Borough with particularly objectives for each area.

**The Low Carbon Transition Plan:** Published in July 2009, sets out a national strategy for climate change and energy and the Renewable Energy Strategy, also published in July 2009 sets out how the UK will reduce emissions and meet targets on renewables. It also announced the establishment of the Office for Renewable Energy Deployment (ORED).

**Zero Carbon Homes:** Meeting the zero carbon standard will involve a combination of energy efficiency measures, use of decentralised energy and a range of "allowable solutions".

**Climate Change Projections:** Updated in 2009 by the UK Climate Impacts Programme (UKCIP - UKCP09) sets out three global emission scenarios based on high, medium and low forecasts for a range of climate and weather related impacts, such as temperature, rainfall, flooding and other extreme weather events.

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**ODPM Safer Places: The Planning System and Crime Prevention (2004)** - The document provides guidance on how to create well-designed, sustainable places that do not fail people, and stand the test of time. This is reflected in SA Objective 8.

**Government Review of Waste Policy in England 2011, DEFRA** - The Review is guided by the “waste hierarchy”, which is both a guide to sustainable waste management and a legal requirement. The hierarchy gives top priority to waste prevention, followed by preparing for re-use, recycling, other types of recovery (including energy recovery), and last of all disposal.

**Securing the Future - UK Government sustainable development strategy 2005** - Sets out 5 key aims:

- Living within environmental limits; respecting the limits of the planet’s environment, resources and biodiversity.
- Ensuring a strong, healthy and just society, which meets the diverse needs of existing and future communities.
- Achieving a strong, stable and sustainable economy.
- Using sound science responsibly, ensuring sound evidence supports policies.
- Promoting good governance.

The document sets out many indicators to measure sustainable development - many of which have been incorporated into the SA Framework and monitoring proposals.

**National Public Service Agreement (PSA) targets for SSSI’s** - to care for our natural heritage, make the countryside attractive and enjoyable for all and preserve biological diversity. Bringing in favourable condition 95 per cent of all nationally important wildlife sites by 2010. This target is set out in the SA Objective.

**The Historic Environment: A Force for the Future (Department for Culture, Media and Sport)** - The strategy sets out the aims:

- To make the historic environment accessible to everyone and ensure it is seen as something with which the whole of society can identify and engage.
- To protect and sustain the historic environment for the benefit of our own and future generations.
- To ensure that the historic environment’s importance as an economic asset is skilfully harnessed.
- To realise the full potential of the historic environment as a learning resource.

**The Air Quality Strategy 2007** - The strategy contains policies for the assessment and management of UK air quality and implementation of European Union (EU) and International agreements.

**Energy White Paper 2007** - The current energy policy of the United Kingdom is set out in the Energy White Paper of May 2007 and Low Carbon Transition Plan of July 2009, building on previous work including the 2003 Energy White Paper and the Energy Review Report in 2006. The focus of policy are on reforming the Electricity Market, rolling out smart meters and improving the energy efficiency of the UK building stock through the Green Deal.

**Saving Lives: Our Healthier Nation White Paper 2004** - In 2004 the Department of Health produced its first ever White Paper on Public Health - Choosing Health: Making Healthier Choices Easier. Choosing Health set out a wide range of proposed actions to address major public health problems, placing population health and health inequalities at the centre of the Government’s health policy agenda. The document sets out many targets relating to health by 2010.

**The Natural Choice: securing the value of nature 2011 DEFRA** - This Natural Environment White Paper is a bold and ambitious statement outlining the Government’s vision for the natural environment over the next 50 years, backed up with practical action to deliver that ambition. The four aims are:

- Protecting and improving our natural environment
- Growing a green economy
- Reconnecting people and nature
- International and EU leadership

**Our Health, Our Care, Our Say:** This White Paper was launched in January 2006 with the aim of ensuring better prevention services, tackling inequalities, improving access to community services and providing more support for people with long term needs. There is a particular emphasis on enabling more care to take place outside hospitals and in the home (which links to the later Lifetime Homes Lifetime Neighbourhoods strategy) and supporting increased levels of independence and wellbeing. In the same year 'A Commissioning Framework for Health and Wellbeing' was established. This White Paper updates the 2004 Health White Paper



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**Health and Social Care Act 2012** - sets out a reform of the National Service and is designed to put clinicians at the centre of commissioning, frees up providers to innovate, empowers patients and gives a new focus to public health.

**Spatial planning for Health (November 2010):** This was produced to promote the contribution of well planned developments in achieving long term health and aligning planning and health

**England's Rural Development Programme (Defra, 2005)** - En 3.1 To use the planning system to achieve sustainable development and protect and enhance the natural and built assets and provide an attractive, healthy and accessible environment and to protect and maintain the cultural heritage of urban and rural areas

Natural England produced a study: **Our Natural Health Service (July 2009):** Stated: 'Natural England believes that the provision of new and improved parks, woodlands and other green spaces is essential to improve the health of people today and in the future. We will work with Local Authorities, planners, developers and the NHS to achieve this goal.' The study cites the following aims: To increase the number of households that are within 5 minutes walk of an area of green space of at least 2 hectares; To enable every GP or community nurse to be able to signpost patients to an approved health walk or outdoor activity programme.

**Lifetime Homes, Lifetime Neighbourhoods:** A National Strategy for Housing in an Ageing Society (2008), and Lifetime Homes Standards: These were designed to help prevent many health issues which arise through unsuitable housing and environments for older people.

**The Play Strategy (Department of Children, Schools and Families, and Department of Culture, Media and Sport, December 2008):** This set out the long term vision for play including a range of safe and stimulating places for children of all ages to play close to where they live.

**Environment Agency Groundwater Protection: Policy and Practice (GP3).** To protect and manage groundwater resources for present and future generations in ways that are appropriate for the risks that we identify. This has been updated in January 2013 merging previous guidance into one single document.

**3/99 Planning Requirement in respect of the Use of Non-Mains Sewerage incorporating Septic Tanks in New Development** - Local planning authorities may wish to include appropriate policies in their development plans to reflect its own knowledge and experience of the circumstances and conditions in various localities within its area; and the views of appropriate bodies on the issue of non-mains sewerage and its likely effect on the environment, amenity and public health.

**Diffuse urban pollution consultation January 2013** -Defra are developing a strategy on how to manage urban diffuse water pollution. The strategy will help prevent water pollution damage to ecosystems in rivers, streams and ponds caused by runoff from roads and industrial areas and poorly plumbed drainage systems.

Natural England "**Nature Nearby Accessible Natural Greenspace Guidance**" - Natural England believes that everyone should have access to good quality natural greenspace near to where they live and have produced. The guidance is aimed at parks and greenspace practitioners and their partners, particularly decision makers, planners and managers of green space. The standards include the Accessible Natural Greenspace Standard (ANGSt). ANGSt was developed in the early 1990's and was based on research into minimum distances people would travel to the natural environment. Natural England reviewed the standard in 2008 and concluded that it was still useful but that further guidance was required to explain how it should be applied. The Nature Nearby report published in 2010 provides this additional clarity. ANGSt recommends that everyone, wherever they live, should have accessible natural greenspace:

- of at least 2 hectares in size, no more than 300 metres (5 minutes walk) from home;
- at least one accessible 20 hectare site within two kilometre of home;
- one accessible 100 hectare site within five kilometres of home; and
- one accessible 500 hectare site within ten kilometres of home; plus a minimum of one hectare of statutory Local Nature Reserves per thousand population.

**Regional (Note that the regional tier of planning has been removed through the Localism Act 2011, but not yet formally revoked by Government)**

**RSS Adopted Regional Spatial Strategy (Jan 2008):** The adopted Regional Spatial Strategy acknowledged that it had a responsibility to help achieve national targets for the reduction of greenhouse gases. A number of mechanisms for responding to climate change were included, all of which are also relevant locally. These were:

- promoting a more sustainable pattern of development which reduces the need to travel and encouraging the use of more sustainable forms of transport (Policies T1 & T2);

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- encouraging the use of sustainable drainage systems (Policy QE9);
- increasing tree cover (Policy QE8); promoting the use of renewable materials (Policies M3 & WD1);
- supporting new industries and technologies that address climate change, and encouraging renewable energy and energy conservation (Policies EN1 & EN2).

RSS Phase Two Preferred Options & Panel Report: The RSS for the West Midlands, Phase Two Revision Draft Preferred Option was published in December 2007, and highlighted the importance of climate change for the Region by including "new" policies on this issue at the beginning of the document.

The RSS set out the following development needs for Stafford Borough:

- 10,300 (10,100 net) new houses in Stafford Borough (an annual rate of 515) of which 7,000 new houses to be the County Town of Stafford (an annual rate of 350)
- 120 hectares of new employment land as a long-term requirement with a continuous five year supply being available of 40 hectares (annual rate = 8 hectares)
- 30,000 square metres of new retail space by 2021 with a further 20,000 square metres beyond 2021, the majority being in the County Town of Stafford
- 45,000 square metres of new offices in Stafford

#### **Sign up for Sport – A Regional Plan for Sport in the West Midlands: 2004-2008**

Local Authorities to complete the assessment of needs and opportunities of open spaces, sport and recreation facilities in accordance with the requirements of PPG17. This work is listed in the evidence base.

**Framework for Regional Employment and Skills Action for the West Midlands Business Clusters** – Framework outlines ten clusters that aim to increase the region's competitive advantage, reputation and wealth creation in key markets and industries, by encouraging businesses to collaborate and exploit strategic opportunities

Community Priorities are to: *Tackle economic exclusion, develop a dynamic and sustainable social economy and revitalise our market towns. The Plan aims to provide conditions for growth and this is also reflected in the economic Sustainability Appraisal Objectives.*

**West Midlands Sustainability Checklist:** Working on a similar principle to the National Building for Life Criteria, the Sustainability Checklist was a detailed assessment on sustainability undertaken at the design and application stage. There were 8 component categories with a series of questions in each. To distinguish, Building for Life focused on new housing schemes and developments whereas the Checklist took a fuller understanding of the locality and addressed the whole scheme design of any development and how it fits within the surrounding area. The Sustainability Checklist aimed to ensure positive outcomes for development ensuring that factors such as green infrastructure, biodiversity, trees, water management, and landscaping were taken in to account early in the development process.

**Skills Action Plan 2009:** This report provided an update and refresh of the Regional Skills Action Plan and reflected the downturn in the economy and changes in national and regional policy. Overall it concluded that there was an overall improvement within the region in terms of skills.

**Green Infrastructure: A Prospectus for the West Midlands** To ensure Green Infrastructure is proactively planned from the earliest stages of strategic plan preparation through to concept and design stages of all future developments in the region.

**Prospectus for Landscapes for Living in the West Midlands** -To improve the quality of life for people within our towns and cities and across the region through increasing the provision of more accessible, wildlife rich open space, providing greater opportunity for people to enjoy wildlife in their daily lives

#### **Staffordshire plans**

**Sport Across Staffordshire and Stoke - on - Trent Business plan 2006 – 2009** - Increasingly Active, Healthy and Successful communities'

In April 2011 Staffordshire County Council published the Strategy Plan for Staffordshire's third **Local Transport Plan (LTP)**. It sets out the County Council's proposals for transport provision within the county, including walking, cycling, public transport, car based travel and freight, together with the management and maintenance of local roads and footways. Integrated Transport Strategies have been developed for the eight Districts / Boroughs in Staffordshire.

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The Strategies will be reviewed annually to reflect the results of consultations and continuing changes in transport issues and priorities.

**The Staffordshire Strategic Plan 2012 - 2017** acts as the overarching strategy for the County. The Staffordshire Partnership's vision is 'to improve the quality of life for all our people, by increasing economic prosperity, improving local services, and developing partnership working.' The Partnership also states that sustainable development is at the heart of the Community Strategy with an aim to ensure Staffordshire continues to be renowned for its quality environment. The Strategy goes on to state that 'for this to be the case, we will need to work to minimise the threats to the natural environment, with a particular focus on climate change. By building on the work we have done in this area, we all, as individuals, organisations and as a County, will have the opportunity to be forerunners in the adaptation and mitigation of measures to tackle climate change, and in ensuring Staffordshire continues to be a place enjoyed by all who live, work and study in it.'

**Regional Biodiversity Strategy for the West Midlands** - Challenge 4: Re-connecting and integrating action for biodiversity with other environmental, social and economic activity.

**Staffordshire Trent Valley Catchment Abstraction Management Strategy (CAMS)** This document outlines where water is available for new abstractors, but also where we need to reduce current rates of abstraction if we are to achieve sustainability.

**Staffordshire Biodiversity Action Plan (SBAP):** The SBAP identifies priority habitats and species, sets targets for their conservation and outlines the mechanisms for achieving these targets. Local policy must support these targets not only to meet UK and European targets but in order to enhance biodiversity throughout Stafford Borough and great networks on a larger scale.

**Joint Waste Core Strategy for Staffordshire and Stoke-on-Trent:** With regard to waste, the Waste Planning Authority (WPA) is Staffordshire County Council, who are the authority responsible for planning for waste treatment and waste disposal facilities. Stafford Borough is responsible for waste collection. National planning policy for sustainable waste management requires that the Core Strategy of a Waste Planning Authority should set out policies that ensure sufficient opportunities for the provision of waste management facilities in appropriate locations. A key vision of the Joint Waste Core Strategy for Staffordshire and Stoke-on-Trent is to treat waste as a resource, including waste as a source of energy, and reduce the overall contribution of waste management to climate change by diverting waste from landfill through developing a network of new and enhanced sustainable waste management facilities, in or close to, the main urban areas.

## Local Plans

### **Stafford Borough Sustainable Community Plan 2006 –2020**

- Ensure that the housing stock offers to everyone the opportunity of a decent home at a price they can afford. Such homes to be accessible and resource efficient
- Maximise supply of affordable housing in both rural and urban areas throughout the Borough
- Promote quality and choice across all housing tenures
- Engage with young people and encourage participation in education activities
- Promote healthy lifestyles for all groups in the population
- To make measurable progress in conserving and enhancing biodiversity across the Borough

**Stafford Borough Councils Homelessness Strategy 2011- 2014** - Ensure decent appropriate housing is available and where appropriate allow people to remain in their homes for life Maximise supply of new affordable housing and improve access to existing affordable housing

**Contaminated Land Inspection Strategy** - The Stafford Borough Council is required to inspect land in its District for contamination under new legislation that came into force on the 1st April 2000. A five-year programme of inspection will be undertaken, running from July 2001 to June 2006

**Stafford Borough Statement of Community Involvement** - This document sets out how consultation on planning policies and planning applications will take place.

**Conservation Area Appraisals for Stafford, Stone and Bradley** - These documents set out important features in conservation areas and recommends management and issues to be considered in planning decisions.



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**Stafford Borough Biodiversity Strategy 2013** - Stafford Borough Council in conjunction with its partners will work towards creating a greener Borough, rich in wildlife for residents to enjoy, which will contribute to their prosperity, health and wellbeing. The aim of the strategy is "To conserve and enhance the characteristic biodiversity of Stafford Borough for present and future generations." The strategy calls for a proactive approach to the conservation of biodiversity interests through the Local Plan, consistent with the biodiversity duty placed upon local authorities. The strategy recognises that the most effective implementation of these policy areas is likely to be achieved through collaboration or partnership working with other agencies and organisations, such as Natural England and the Staffordshire Wildlife Trust.

**The Green Infrastructure Strategy (2009)** sets key spatial and thematic priorities for the delivery of green infrastructure in the Borough. The key thematic recommendations of the study were the creation of biodiversity intervention zones, wildlife corridors, movement corridors, strategic open spaces and landscape quality areas. The implementation of local strategic frameworks at the Penk and Sow Parklands, Stafford Common Community Park, and Stone canal and Riverside Park are also identified.

**Cannock Chase AONB Management Plan 2009** - The management Plan provides for the strategic direction for the conservation and enhancement of the AONB. The plan, which is produced every five years, provides

a number high level objectives, from which are developed key issues for each of the overarching themes of landscape, people, economy, recreation and support. For each theme actions are developed, along with a monitoring framework to manage the delivery of the overall vision for the AONB.

#### 3.1 Key sustainability issues and likely evolution without The Plan for Stafford Borough

##### Summary of the Sustainability Issues

**3.29** Reviewing the relevant plans and programmes, and considering the baseline character of the area highlights a number of sustainability issues facing Stafford Borough, as set out below. These are relevant to producing the new Local Plan and have been considered throughout the SA process, in particular helping to inform the SA objectives developed at the Scoping stage. The table also sets out how these issues are likely to develop over time in the absence of a new Local Plan.

Table 5 Key sustainability issues and likely evolution without The Plan for Stafford Borough

Social Issues	Likely evolution without The Plan for Stafford Borough
High levels of deprivation in some areas of the Borough	Likely to continue without appropriate Policy response
Low level of provision of affordable housing compared with rising house prices	Likely to continue without specific target in place
Lack of access to services and facilities in some parts of the Borough	Likely to continue in line with national trends.
Slight increase in number of homeless households in recent years	Likely to continue without housing development strategy
The level of outdoor space provision is much lower than the national target	Likely to continue without appropriate policy setting out targets and local standards
Ageing population across the Borough and need to ensure that their needs are catered for in terms of housing, access and healthcare	Needs will only be addressed through stakeholders plans and projects and not through a strategic approach
Economic issues	Likely evolution without The Plan for Stafford Borough
Decline in manufacturing industry resulting in job losses	Employment trends likely to continue
Opportunities for tourist related economy	Likely to continue but potential negative impacts not considered
Slight increase in VAT business start ups in Stafford Borough	Uncertain without planned economic strategy

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Social Issues	Likely evolution without The Plan for Stafford Borough
Decline in agricultural industries	Employment trends likely to continue without positive planning policies in place to allow for rural diversification
Vacant units within the town centres	Likely to continue in line with national trends.
Graduates moving out of area once finished studies	Likely to continue without planned economic strategy and increased opportunities to a range of employment options, particularly hi-tech or research based employment
Environmental Issues	Likely evolution without The Plan for Stafford Borough
Loss of biodiversity habitats	Likely to continue and may be exacerbated without a strategic planned approach and aim for biodiversity habitat creation and improvement
Quality of SSSI's is important, but still below the national target	Likely to continue and may be exacerbated without a planned approach to development
Whilst river biology and chemistry have improved over the last decade, both are still below the national average	Likely to continue and may be exacerbated without a planned approach to development
High percentage of new homes have been delivered on previously developed land in last 10 years	Less development on previously developed land without policy however The Plan includes large scale greenfield development
Stafford Borough's Biomass energy project will provide renewable energy and opportunities for further renewable energy development in the future	Development likely to continue but not at same rate as with policy aiming to achieve high environmental standards
Protection and adaptation of heritage assets	National policy should help to protect and enhance heritage assets but whether or not this will be consistent across all sites is uncertain
Loss of Individual character for Stafford Borough's settlements	Likely to continue and may be exacerbated without a planned approach to development and no design policies in place

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## 4 Sustainability Appraisal Framework

**4.1** The Sustainability Appraisal Framework is the framework that has been used to appraise the development strategy, strategic sites and planning policies. The framework is made up of sustainability objectives, indicators and targets tailored to the key sustainability issues for Stafford Borough. Table 11 below shows the sustainability appraisal objectives that has been used to appraise all policies, development strategy and strategic development locations in the Plan for Stafford Borough - Publication. The detailed findings of the appraisal process are contained in matrices in i.1 'Appraisal Table'.

**4.2** This SEA/SA has followed the standard methodology recommended by the Office of the Deputy Prime Minister, now the Department for Communities and Local Government, and updated in guidance published in November 2005.

### Sustainability Appraisal Methodology

**4.3** The aim of the appraisal has been to identify any significant conflicts or synergies between each stage of the plan process and the SEA/SA objectives. Sustainability effects of the policies in The Plan - Publication have been assessed by predicting and weighing the consequent effect of the option in terms of its probability, duration, frequency and reversibility.

**4.4** The principle of the SA Framework was outlined in the Scoping Report (September 2007), in particular the methodology used for assessing each planning policy or plan option. The Report set out the following:

### Sustainability Appraisal Commentary

**4.5** A key element of the Sustainability Appraisal process is to compare the Sustainability Appraisal Objectives with the Plan Objectives to appraise the plan in terms of sustainability and the achievement of targets under SEA target areas. Using the table below the DPD Plan Objectives will be compared to the Sustainability Appraisal Objectives. The purpose of this analysis is to ensure that the plan objectives in each individual DPD are in accordance with the Sustainability Appraisal objectives to assist with the development of policy options.

Table 6 Example of Plan Objective Appraisal table

Plan Objective	Sustainability Appraisal Objective				
1	2	3	4	5	
PO1	Compatible	Compatible	Compatible	Conflict	Compatible
Comments: Plan Objective 1 is in conflict with Sustainability Objective 4 because.....					
PO2	Compatible	Conflict	Compatible	Compatible	Compatible
Comments: Plan Objective 2 is in conflict with Sustainability Objective 2 because.....					
PO3	Compatible	Compatible	Compatible	Compatible	Compatible

4 Sustainability Appraisal Framework

**4.6** The Sustainability Appraisal Commentary will also test the compatibility of the Plan Objectives with each other, using the table below. Where conflicts exist between the various objectives these will be highlighted. Whilst the aim would be to achieve consistency with each other, in practice there will be tensions between Plan Objectives. The purpose of this exercise is to highlight where win-win situations cannot be achieved. Where this occurs decision makers are required to determine where the priorities should lie.

Table 7 Example of Plan Objectives Appraisal Table

	PO1	PO2	PO3	PO4
PO1	Compatible	Compatible	Compatible	Compatible
PO2	Compatible	Compatible	Compatible	Compatible
PO3	Compatible	Conflict	Compatible	Compatible
PO4	Compatible	Compatible	Compatible	Compatible
Plan Objective 3 is in conflict with Plan Objective 2 because.....				

**4.7** During the preparation of the issues and options for each individual DPD various policy options will be developed in order to meet the plan objectives. Each of these policy options will be tested through the Sustainability Appraisal Framework to identify the sustainability effects of each option and to assess its performance in terms of sustainability.

**4.8** Initially the various policy options and alternatives will be appraised against the sustainability objectives to establish whether the effect is positive, negative or uncertain through the short, medium and long term perspective. For example will the policy option create two jobs or a hundred jobs; will the policy option temporarily cause noise pollution whilst buildings are constructed or lead to a more permanent noise infringement. As such, during this Sustainability Commentary stage general differences between the alternatives will be considered and documented. Further details will be duly assessed as the options are developed and the DPD's progress through the various stages.

**4.9** 10.6 The most effective way of appraising the effects of a policy option is by comparing it with a state, an option or an objective. Using the table below refined policy options will be compared with the sustainability objectives. This process may also lead to new policy options being developed or composed of several different aspects of the initial DPD policy options.

Table 8 Example of Options Appraisal Process

SA	Option A		Option B		Option C	
	M	L	S	M	L	S
S						
SA 1						
SA 2						

SA	Option A	Option B	Option C
SA 3			
SA 4			
SA 5			
SA 6			
SA 7			
SA 8			
SA 9			
SA 10			
Comments			
Recommendation			

**4.10** Where policy options could be altered in light of the Sustainability Appraisal (SA) process this will be highlighted in the SA Commentary. The Sustainability Appraisal Commentary will also provide comments on any sustainability issues that arise during the refinement of the policy options or during the consultation process.

**4.11** The developing and refining options process will form part of the Sustainability Appraisal Commentary, which will be consulted upon at the same time as the DPD Issues and Options Papers. Alongside the appraisal of plan options the SA commentary will also compare plan options against the option of 'do nothing' or business as usual. This will highlight what benefits each plan option could provide.

**Stage C - preparing the Sustainability Appraisal Report.**

**4.12** The next stage of the Sustainability Appraisal process is to assess, in more detail, each preferred policy option in the DPD Draft Publication Report to determine whether it is likely to have a significant effect on the environment and sustainable development. The objective of this stage is to predict and evaluate the effects of DPD policies so that where adverse effects are predicted consideration will be given to what mitigation measures may be required. This will lead to Stage C – preparing the Sustainability Appraisal Report.

**4.13** Each preferred policy option will be assessed using the table set out below, with recommendations for refining the policy option included in the process. At this stage it is expected that the predictions regarding the policy impacts may be broad based and qualitative rather than detailed and quantitative if there are limitations in the data that is available. Where possible the potential effects will be quantified, although where this is not possible a subjective judgement will be made.

Table 9 Example of predicted impacts table

SA Obj	Indicators	Effects over time	Comments





Policy	SA Objective				
4					
5					
Effects					

**4.15** Where policies are proposed for alteration in light of the Sustainability Appraisal (SA) process these will be highlighted in the Sustainability Appraisal Report. The SA process will also provide a commentary on any sustainability issues that arise during the refinement of the preferred policy options. Conclusions on the overall sustainability effects of the preferred policy option will be provided as part of the SA Report.

**4.16** Furthermore the Sustainability Appraisal Report will detail the proposals for monitoring the sustainability effects of each individual DPD, allowing the actual effects of the DPD to be measured against those predicted in the SA.

**4.17** The appraisal of the effects of the plan will form part of the Sustainability Appraisal Report, which will be available for consultation at the same time as the Draft Publication Reports for each individual DPD.

**4.18** In assessing the effects of the new plan against sustainability objectives, the following issues have been considered:

- **Timescale:** Are the potential effects short, medium or long term, and are they likely to be permanent or temporary? Indicative timescales which have been referred to in this document are defined below:

Short Term                      0 - 5 years

Medium term                    5 - 10 years

Long term                        10 - 20 years

- **Magnitude, scale and likelihood of occurrence:** What is the potential scale of the effect based on a scale of minor, moderate or major and considering the geographical area and size of population likely to be affected? In addition, how likely is it that the effect will actually occur?
- **Status of the effect:** Are the effects of the policy likely to be positive or negative?
- **Cumulative/secondary and synergistic effects:** Is it likely that development implemented in accordance with the policies of the plan will have cumulative, secondary and synergistic effects on the environment or on existing social or economic conditions?
- **Mitigation:** Can predicted adverse effects be avoided through introducing conditions or changes in the way in which policies are implemented? Options for introducing mitigation include considering revised, alternative or new policies or policy criteria to reduce the potential impacts.

## 4 Sustainability Appraisal Framework

### Assumptions and factors taken into account during the SEA/SA

**4.19** The SEA/SA process is based on systematic review techniques. However, it also relies on an element of subjective judgement and predictions about how people's patterns of behaviour will change as a result of development, and the type and location of development which would be implemented. The following general assumptions and factors were taken into account when appraising the various components of The Plan.

- The effects of new development on travel patterns are not easy to determine, since this depends on a wide range of factors, many of which are outside the remit of the planning system. Of these factors perhaps the most significant is the cost of fuel. Although the ease of driving between A and B is another factor which also needs to be considered, the development strategy and settlement hierarchy seeks to concentrate development largely within Stafford, Stone and the larger rural settlements. Whilst this should lead to a reduction in vehicular trips between work and home for people based in these centres and settlements, elsewhere people will remain heavily reliant on cars to access employment, education, health, community, leisure and recreational facilities.
- The precise level of planning applications that will come forward once The Plan is adopted is unknown. Whilst The Plan sets out strategic sites and a strategy, factors such as land values, current economic growth can influence the timing of when applications are submitted. Similar factors can also the completion of projects and future occupancy and use.
- There is uncertainty surrounding precisely how the ambitions of The Plan would be implemented on the ground and the degree to which they would be achieved in practice, particularly since many different partners are involved in its delivery). A key assumption in the SA process is that the policies in The Plan would be fully implemented.
- In terms of the prediction and evaluation of significant effects, The Plan defines strategic areas for housing and employment development, and it is possible to predict effects that may be likely in those areas through, for example, examining proximity to sensitive environmental receptors and predicting future increases in traffic volumes. However, there is often a degree of uncertainty regarding these future effects; more detailed impact assessments as part of individual projects will often be required and this has been stated in the sustainability appraisal where this is the case.
- Actual effects will often depend on elements such as the type of development that takes place, its exact location in terms of sensitive environmental receptors, the sustainability of buildings i.e. materials used, energy and water efficiency etc., design quality and transport mitigation measures. The extent of any mitigation measures to prevent or reduce any effects or compensatory measures for loss will be very important and cannot always be fully assessed at this stage. It has been assumed that necessary mitigation measures will be delivered alongside development.
- Efforts has been made to present an accurate baseline situation in the scoping report and the updated Sustainability Appraisal Technical Appendices but there may be further information that was not available at the time of appraisal.

### Changes to the Sustainability Appraisal Methodology

**4.20** Following consultation on the two SA Commentary documents, the SA Report and the Sustainability Appraisal of the Strategic Policy Choices, additional questions, indicators and targets have been included to illustrate how policies are appraised against the SA objectives. Various changes have occurred to the policy, plan and programme framework

### Limitations

**4.21** It is important to understand that the SA was a desk-based exercise carried out to report the generic potential sustainability effects of implementing The Plan for Stafford Borough. It is a strategic level exercise to inform the preparation of the DPD and therefore does not contain as much detail as a site-specific environmental impact assessment that might accompany a specific development proposal. In addition, it should be noted that the sustainability appraisal itself has not been used to select the

strategic sites. Rather, it satisfies the requirements of the SEA Directive and Planning and Compulsory Purchase Act to identify the likely significant sustainability effects of implementing the DPD, i.e. it sets out the potential sustainability effects (both minor and significant) of the sites considered for development in The Plan and the policies to be implemented. The sustainability appraisal has proved to be a useful tool in raising awareness of potential effects to inform the content of The Plan.

**4.22** Various changes have been made to the Planning system since 2010 and some iterations of The Plan are no longer proposed as they are addressed by National Planning Policy.

**4.23** Inevitably, a degree of judgement has been required in undertaking the policy appraisals to determine the 'significance' of effects. Sustainability appraisal relies on judgement guided by knowledge of the likely impacts of the plan, the baseline data available and responses and information provided by consultees and other stakeholders. A 'precautionary approach' has been taken, especially with qualitative judgements and any uncertainties are highlighted if there is any doubt as to the effect of the plan.

#### 4.1 Sustainability Appraisal Objectives

Table 11 Sustainability Appraisal Framework

Sustainability Objective	SEA Topic	Indicator and Target	Detailed Decision Making Criteria
1. To create high, stable and equitable levels of employment	N/A	Employment Rate <b>Target:</b> Maintain good performance of employment	Will it reduce unemployment levels?
		Unemployment Rate <b>Target:</b> Maintain good performance	Will it provide job opportunities for those most in need of employment?
2. To ensure high and stable level of economic diversity and competitiveness that recognises social and environmental issues	N/A	Gross Value Added <b>Target:</b> Increase in line with figure for South Staffordshire	Will it help to improve earnings?
		Number of jobs created across all sectors of the economy <b>Target:</b> Increase	Will it increase access to employment opportunities in, or accessible to, rural areas?
		Number of new jobs created in rural areas <b>Target:</b> Increase	Will it lead to a net reduction in the number of people commuting to work outside the Borough?
		Foreign Direct Investment (FDI) <b>Target:</b> Increase share of FDI	Will it promote growth in key sectors? Will it encourage inward investment?

## 4 Sustainability Appraisal Framework

Sustainability Objective	SEA Topic	Indicator and Target	Detailed Decision Making Criteria
		<p>The number of people reaching NVQ4+ qualifications</p> <p><b>Target:</b> Increase</p> <p>Employment land take up rates on previously developed land</p> <p><b>Target:</b> Increase take up rates</p> <p>Number of planning permissions for business premises linked to farm diversification in rural areas</p> <p><b>Target:</b> Increase</p> <p>Employment land take up rates</p> <p><b>Target:</b> Increase take up to meet the requirement</p>	<p>Will it encourage graduates to return and help to retain skilled employees in the area?</p> <p>Will it provide or contribute to the availability of a balanced portfolio of employment sites?</p>
3. To sustain the vitality and viability of Stafford Borough's towns and villages, and their communities	N/A	<p>Adaptability and proximity of new developments to services</p> <p><b>Target:</b> No new development beyond 5 km of the Borough's towns</p> <p>Number of Vacant Units</p> <p><b>Target:</b> Reduce</p> <p>Rank of centres: Stafford ranked at 147 nationally in 2010</p> <p><b>Target:</b> Increase rank</p> <p>Housing densities in town centres</p> <p><b>Target:</b> 40-50 dwellings per hectare in town centres</p> <p>Retail land take up rates</p> <p><b>Target:</b> Increase</p>	<p>Will it make Stafford Borough more attractive to potential visitors and businesses?</p> <p>Will it support existing services and facilities?</p> <p>Will it contribute to a quality built environment?</p>
4. To support the needs of the local rural economy and communities.	N/A	<p>Number of planning permissions for business premises linked to farm diversification in rural areas</p> <p><b>Target:</b> Increase</p> <p>Availability of affordable homes to accommodate local needs in rural areas</p> <p><b>Target:</b> Increase according to identified need</p> <p>Amount of employment land on previously developed land that could be used to expand existing business located within the Green Belt</p>	<p>Will it increase access to employment opportunities in, or accessible to, rural areas?</p> <p>Will it contribute to the provision of affordable housing which meets identified local need?</p>

Sustainability Objective SEA Topic	Indicator and Target	Detailed Decision Making Criteria
	<p><b>Target:</b> Increase according to identified need</p> <p>Re-use vacant land and buildings for employment purposes in the rural area</p> <p><b>Target:</b> Increase according to identified need</p> <p>Number of facilities located within rural centres</p> <p><b>Target:</b> Increase according to identified need</p> <p>Number of sites identified for affordable housing through rural exception sites</p> <p><b>Target:</b> Increase according to identified need</p>	
5. To reduce vulnerability to the effects of climate change such as the risk of flooding, on public wellbeing, the economy and the environment.	<p>Population, health and human material assets</p> <p><b>Target:</b> All new developments to incorporate water saving measures and sustainable drainage techniques</p> <p>The number of developments given planning permission contrary to Environment Agency advice the environment</p> <p><b>Target:</b> None</p>	<p>Will it reduce the proportion of development within the floodplain?</p> <p>Will it minimise the risk of flooding from rivers and watercourses to people and property?</p> <p>Will it result in development that is able to withstand the effects of climate change?</p>
6. To ensure that everyone has the opportunity of a decent and affordable home	<p>Number of new housing developments that incorporate public transport provision</p> <p><b>Target:</b> All / Increase</p> <p>Number of affordable / special needs housing</p> <p><b>Target:</b> In line with local need</p> <p>Number of unfit dwellings</p> <p><b>Target:</b> Meet Government's decent homes standards</p> <p>Homelessness</p> <p><b>Target:</b> To provide sufficient short / medium term accommodation</p> <p>Number of new residential developments that provide for the accessibility of all users</p> <p><b>Target:</b> All / Increase</p>	<p>Will it contribute to the provision of affordable housing which meets identified local needs?</p> <p>Will it contribute to a mix of housing types?</p> <p>Will it reduce homelessness?</p> <p>Will it increase the range and affordability of housing for all social groups?</p> <p>Will it reduce the number of vacant properties?</p>

## 4 Sustainability Appraisal Framework

Sustainability Objective SEA Topic	Indicator and Target	Detailed Decision Making Criteria
	<p>Number of new residential developments in the rural area providing for identified affordable / local needs housing</p> <p><b>Target:</b> Increase according to identified need</p> <p>Number of new residential developments incorporating high quality layouts and landscaping</p> <p><b>Target:</b> All</p> <p>Number of homes meeting Code for Sustainable Homes</p> <p><b>Target:</b> Increase / in line with Government targets</p>	<p>Will it result in new developments being located in areas served by public transport?</p> <p>Will it make access more affordable?</p> <p>Will it improve accessibility to key local services?</p> <p>Will it make access easier for those without access to a car?</p> <p>Will it protect existing key services and facilities?</p>
7. To improve opportunities for access for all to work, education, health and local services	<p>Number of new developments incorporating a range of transport options</p> <p><b>Target:</b> All</p> <p>Disabled access</p> <p><b>Target:</b> All new build to comply with Disability Discrimination Act</p> <p>% of development within walking distance (350 metres) of a frequent service</p> <p><b>Target:</b> 100% of all new developments in urban areas</p> <p>Number of mixed use developments</p> <p><b>Target:</b> Increase</p>	<p>Will it reduce actual levels of crime?</p> <p>Will it reduce the fear of crime?</p> <p>Will it promote design that discourages crime?</p> <p>Will it reduce social disorder?</p>
8. To reduce and prevent crime and reduce fear of crime	<p>Number of new developments incorporating crime prevention design measures</p> <p><b>Target:</b> Increase</p> <p>Recorded crime per 1,000 population</p> <p><b>Target:</b> Maintain good results relative to other districts</p> <p>Fear of crime surveys</p> <p><b>Target:</b> Reduce fear of crime</p> <p>Number of new developments incorporating secured by design certification</p> <p><b>Target:</b> Increase</p>	



Sustainability Objective SEA Topic	Indicator and Target	Detailed Decision Making Criteria
9. To reduce the impact of noise and light pollution	<p>Number of developments incorporating landscaping as a way of reducing potential noise or light impacts</p> <p><b>Targets:</b> Increase</p> <p>Public concern over noise</p> <p><b>Target:</b> Low % of residents surveyed who are concerned with different types of noise</p> <p>Proximity of land uses that create noise and / or anti-social behaviour at night</p> <p><b>Target:</b> Low number of breaches of Integrated Pollution Prevention and Control permits on permitted noise level</p> <p>Public concern over light pollution from residential developments</p> <p><b>Target:</b> Low % of residents surveyed who are concerned about light pollution</p>	<p>Will it reduce indirect pollution (e.g. increased traffic)?</p>
10. To improve health, safety and well-being across the whole community	<p>Number of Listed Buildings 'at Risk' across the Borough</p> <p><b>Target:</b> Reduce</p> <p>Number of development sites that lead to the creation and enhancement of open spaces</p> <p><b>Target:</b> Increase in line with Green Infrastructure Strategy</p> <p>Number of waterside developments which improve accessibility and quality of the water environment</p> <p><b>Target:</b> All</p> <p>% of residents within 500m (15 minutes walk) of public open space</p> <p><b>Target:</b> Increase</p> <p>Modal Split</p> <p><b>Target:</b> Increase potential trips on foot, quadruple levels of cycling trips by 2012 compared to 1996 (Dept. For Transport, Transport 10 year Plan,2000)</p> <p>Air Quality Management Area</p> <p><b>Target:</b> No air quality management area</p> <p>Number of buildings and vacant land reused</p>	<p>Will it ensure that all people have access to public open space within a reasonable distance from where they live?</p> <p>Will it improve access to natural greenspace?</p> <p>Will it improve access to high quality health facilities?</p> <p>Will it encourage healthy lifestyles?</p>



## 4 Sustainability Appraisal Framework

Sustainability Objective SEA Topic		Indicator and Target	Detailed Decision Making Criteria
		<p><b>Target:</b> Increase</p> <p>Number of developments within town centres incorporating quality landscaping and linkages with the surrounding urban fabric</p> <p><b>Target:</b> All</p> <p>Hectares of public open space per 1,000 population</p> <p><b>Target:</b> Increase in line with local standards and Green Infrastructure Strategy</p>	
11. To reduce societal contributions to climate change	Air, Population, Human Health and climatic factors	<p>% of new developments producing Travel Plans to encourage use of sustainable modes of travel</p> <p><b>Target:</b> All</p> <p>Length of cycleways</p> <p><b>Target:</b> Increase</p> <p>Number of new development incorporating water efficiency techniques</p> <p><b>Targets:</b> Increase</p> <p>% of new developments encompassing energy efficient design / layout / features</p> <p><b>Target:</b> 30% improvement in energy efficiency over 15 years from 1996 (11.1% achieved so far)</p> <p>Woodlands lost to new development</p> <p><b>Target:</b> None</p> <p>Proportion of energy supply to be secured from decentralised and renewable or low-carbon energy sources</p> <p><b>Target:</b> 10% or higher</p>	<p>Will it minimise greenhouse gas emissions?</p> <p>Will it reduce carbon dioxide emissions?</p> <p>Will it utilise existing infrastructure?</p> <p>Will it lead to reduced consumption of materials and resources?</p> <p>Will it reduce waste generation?</p> <p>Will it increase waste recovery and recycling?</p> <p>Will it lead to an increased proportion of energy needs being met from renewable sources?</p> <p>Will it increase energy efficiency?</p> <p>Will it make use of new and clean technologies?</p> <p>Will it lead to the protection of designated sites?</p> <p>Will it lead to the enhancement of designated sites?</p>
12. To protect and enhance biodiversity	Biodiversity, Flora and Fauna	<p>Number of developments that may detrimentally affect biodiversity conservation value</p> <p><b>Target:</b> Reduce to minimum</p> <p>Number of developments that may detrimentally affect features of geological conservation value</p> <p><b>Target:</b> Reduce to minimum</p>	

Sustainability Objective SEA Topic	Indicator and Target	Detailed Decision Making Criteria
	<p>Quality of historic parks and gardens  <b>Target:</b> Maintain / Conserve</p> <p>Quality of Sites of Special Scientific Interest (SSSI)  <b>Target:</b> 95% of SSSI's to be in 'favourable or 'recovering' condition</p> <p>Sites achieving Biodiversity Action Plan  <b>Target:</b> To achieve 100% of targets as set out in Staffordshire Biodiversity Action Plan</p> <p>Number of planning permissions given affecting SSSI designated sites  <b>Target:</b> No planning permissions granted that affect SSSI sites</p> <p>Number of developments that protect and enhance sites and spaces important for biodiversity as set out in the Staffordshire Biodiversity Action Plan  <b>Target:</b> Increase</p> <p>Quality of rivers, canals and freshwater bodies within the Borough  <b>Target:</b> Achieve standards set out by the Water Framework Directive</p>	<p>Will it result in habitat creation at all scales/Will it conserve and enhance natural/ seminatural habitats?</p> <p>Will it conserve and enhance nationally significant species and habitats?</p> <p>Will it improve biodiversity within urban areas?</p> <p>Will it enhance the wider ecological network and seek to minimise the fragmentation of nature corridors and networks?</p> <p>Will it reduce indirect impacts on designated sites?</p>
13. To protect and conserve soil	<p>Percentage of development on previously developed land  <b>Target:</b> Maximise use where possible</p> <p>Area of statutory contaminated land remedied  <b>Target:</b> Await Environment Agency Soil Strategy Implementation Plan</p> <p>Area of land converted to organic / agricultural environment schemes  <b>Target:</b> Increase</p> <p>Soil degradation  <b>Target:</b> Minimise the degradation or loss of soils to new developments</p> <p>Number of developments given planning permission contrary to EA advice  <b>Target:</b> No planning permission to be granted contrary to the Environment Agency's advice based on the risk of contamination to underlying groundwater</p>	<p>Will it result in the protection/retention of the Best and Most Versatile agricultural land (Grades 1-3a)?</p> <p>Will it minimise and seek to reclaim derelict and contaminated land?</p>

## 4 Sustainability Appraisal Framework

Sustainability Objective	SEA Topic	Indicator and Target	Detailed Decision Making Criteria
14. To protect and enhance water quality of the Borough's rivers whilst maximising their carrying capacity through achieving sustainable water resource management	Water	<p>Number of developments that do not make efforts to increase water consumption or pollution</p> <p><b>Target:</b> None / Minimise</p> <p>Quality of rivers, canals and freshwater bodies within the Borough</p> <p><b>Target:</b> Achieve standards set out by the Water Framework Directive</p> <p>Number of new developments incorporating sustainable drainage systems and other water saving techniques</p> <p><b>Target:</b> All new development to incorporate water saving measures</p> <p>Number of developments given planning permission contrary to Environment Agency advice based on an unacceptable risk of contamination to 'Controlled Waters'</p> <p><b>Target:</b> None</p> <p>Number of development proposals which are to dispose of foul waters via a non-mains technique</p> <p><b>Target:</b> All large developments to dispose via mains</p>	<p>Will it improve the quality of controlled waters?</p> <p>Will it increase the quality and quantity of the water environment?</p> <p>Will it reduce direct or indirect pollution of the water environment?</p> <p>Is there adequate foul drainage infrastructure?</p> <p>Will it protect floodplain capacity?</p> <p>Is there clear opportunity for future maintenance of Sustainable Drainage Systems?</p>
15. To protect, enhance and, where necessary, restore designated landscape areas and town character, scenic beauty, local distinctiveness, historic and cultural character	Cultural Heritage and Landscape	<p>Change in areas of highly sensitive historic and landscape character</p> <p><b>Target:</b> None</p> <p>Number and % of Listed Buildings and Scheduled Monuments 'at risk'</p> <p><b>Target:</b> Reduce the number of sites and buildings 'at risk'</p> <p>Number of historic buildings restored and brought back into use</p> <p><b>Target:</b> Increase</p> <p>% of Borough covered by historic landscape / urban characterisation studies</p> <p><b>Target:</b> Increase</p> <p>Number of planning permissions adversely affecting the Cannock Chase Area of Outstanding Natural Beauty (AONB)</p> <p><b>Target:</b> None</p>	<p>Will it protect and enhance sites features and areas of historical, archaeological and cultural value in both urban and rural areas?</p> <p>Will it improve the quality and character of landscapes and townscapes?</p> <p>Will it help to conserve historic buildings through sensitive adaptation and re-use?</p> <p>Will it lead to the retention and enhancement of heritage assets?</p> <p>Will it lead to reduced pressure on the cultural heritage (e.g. archaeology)?</p>

Sustainability Objective SEA Topic	Indicator and Target	Detailed Decision Making Criteria
	<p>Provision of accessible natural greenspace</p> <p><b>Target:</b> A greenspace of at least 2ha within 300m from home; a Local Nature Reserve at a minimum of 1ha per thousand population; at least one greenspace site within 5km of home and one 500ha site within 10km of home</p> <p>Number of developments and re-use of existing buildings in the Green Belt area that do not maintain its openness</p> <p><b>Target:</b> None</p> <p>Number of people living close to accessible woodland, accessible recreational routes and spaces</p> <p><b>Target:</b> Increase</p>	<p>Will it contribute to a quality built environment?</p>
16. To create a sense of community identity and belonging	Population	<p>Projected household change</p> <p><b>Target:</b> Maintain number of households</p>
17. To ensure tolerance, respect and engagement with people from different cultures, backgrounds and beliefs recognising their rights and responsibilities	Population and Human Health	<p>% of residents who think that people being attacked because of their skin colour, ethnic origin or religion is a very big or fairly big problem in their local area</p> <p><b>Target:</b> Reduce</p> <p>Will it encourage engagement in community activities?</p> <p>Will it lead to a net reduction in the number of people commuting to work outside the borough?</p> <p>Will it improve ethnic relations?</p>
18. To ensure that all individuals and groups in society have the opportunity to effectively engage in issues relating to their community	Population and Human Health	<p>E-enabled interactions as a proportion of all interactions</p> <p><b>Target:</b> Increase E-enabled interactions for the new Local Plan</p> <p>Number of DPD's compliant with the Statement of Community Involvement (SCI)</p> <p><b>Target:</b> All DPD's to be compliant with the SCI</p>
19. To encourage a strong, inclusive, community and voluntary sector	Population and Human Health	<p>% of voluntary / community organisations performing well</p> <p><b>Target:</b> Maintain</p> <p>Will it encourage increased voluntary levels?</p>

## 4 Sustainability Appraisal Framework

Sustainability Objective	SEA Topic	Indicator and Target	Detailed Decision Making Criteria
20. To engender a sense of civic and neighbourhood values, responsibility and pride	Population and Human Health	Well-being score <b>Target:</b> Increase well-being score across the neighbourhoods in the Borough	Will it encourage engagement in community activities?

## 5 Summary and Recommendations

**5.1** This document appraises The Plan for Stafford Borough - Publication which includes the the development strategy, planning policies and strategic development locations.

**5.2** The assessment process will have a variety of positive effects, neutral or uncertain effects. Negative effects are identified in terms of contrubutions to climate change as a result of some of the policies and loss of greenfield land.

**5.3** Potential positive impacts can seen across all sustainability objectives. The Plan for Stafford Borough aims to encourage sustained economic prosperity and, where required, regeneration, paying particular attention to the interests of the Stafford town, which is a growth point and County Town. Through the provision of affordable and specialist housing, there should be greater access to a home for local people and for an ageing population. The environmental and cultural character of the Borough will be protected and enhanced through the advocating of Green Infrastructure and the landscape and historic environment policies and there will be other benefits as a result of providing mitigation for the Cannock Chase SAC.

**5.4** The Plan for Stafford Borough will need to act in partnership with other strategies and stakeholders in the Borough to help deliver all the potential benefits, adjusting the approach, and reviewing policies if required, before the end of the plan period.

**5.5** There are a number of uncertain effects identified, these include the economic viability and the impact this may have on the delivery of employment opportunities, economic competitiveness, housing and associated infrastructure. Other uncertain effects are contributions and effects of climate change which are difficult to assess. However, their effects are likely to be played out over the long term, giving the opportunity for monitoring and mitigation, such as working with service providers to offset the worst effects of change and reviewing policies. Proposals for monitoring can be found below.

**5.6** The sustainability appraisal recommends several policy word changes which would improve some of the uncertain or minor positive effects. A summary of the changes is set out below with the detail found in Appendices 1 The assessment makes recommends changes to the wording of the following policies:

Policy	Nature of word changes
Policy Stafford 1: Stafford Town	Reference to be made to opportunities for low carbon networks including district heating solutions, townscape character and where practical and feasible optimises the use of brownfield land
Policy Stafford 2: North of Stafford	Reference to be made for the aim to provide a variety of employment types
Policy E4: Raleigh Hall & Ladfordfields Recognised Industrial Estates	Where they exist, development maximises the opportunities for low carbon networks
Policy C1 Dwelling Types and Sizes	To provide a proportion of lifetime homes standards

**5.7** The Plan for Stafford Borough will provide mitigation to some negative or uncertain effects through the implementation of all policies and this is discussed in 6 'Mitigation' on mitigation.

**5.8** The assessment has included additional monitoring proposals to the monitoring framework previously identified in the Sustainability Appraisal Report. These relate to:

- Potential over provision of employment land
- Over provision of housing in the rural area, particular areas outside of the settlement hierarchy
- Provision of sites to meet the needs for gypsy, travellers and travelling show-people
- Provision of affordable housing
- Provision of specialist housing and lifetime home standards

## 5 Summary and Recommendations

- Delivery of development meeting Natural Englands Accessible Natural Greenspace Standards
- Delivery of schemes for biodiversity enhancements

**5.9** More detail on the specific appraisal can be found in i.1 'Appraisal Table'



## 6 Mitigation

6.1 Throughout the appraisal process several negative effects and uncertain effects have been identified. Some of these are not considered to be significant and this is due to the potential for mitigation to be provided as part of the implementation of other policies in the plan. The Table below summarises the minor negative effects by sustainability appraisal objective and list the policies that will offer mitigation. There are still some negative effects where policies would not provide adequate mitigation and amendments to policies are suggested.

Table 12 Mitigation provided by other policies

SA Objective	Description of minor negative or uncertain effects	Policy minor negative or uncertain effect applies	Policies offering mitigation to identified negative or uncertain effects
1	Policies in relation to climate change and low carbon development have the potential to have a positive effect on the long term viability of businesses as well as offering opportunities for the local economy, which will assist with employment levels. Loss of employment in manufacturing, opportunities for growth in relation to renewable energy technology sector and need to retain graduates are all identified as sustainability issues.	Policy N2: Climate Change Policy N3: Low Carbon Sources & Renewable Energy	Ensuring that the policies are implemented fully - see monitoring framework
2	Policies in relation to climate change and low carbon development have the potential to have a positive effect on the long term viability of businesses as well as offering opportunities for the local economy, which will assist with employment levels. Loss of employment in manufacturing, opportunities for growth in relation to renewable energy technology sector and need to retain graduates are all identified as sustainability issues.	Policy Stafford 2: North of Stafford Policy N2: Climate Change Policy N3: Low Carbon Sources & Renewable Energy	
3	There are several negative effects or uncertain effects relating to sustainability appraisal objective 3. This is mainly in relation to uncertainty over the use of vacant land and buildings, uncertainty over whether development will support existing services, whether policies will contribute to a quality built environment and whether development will make the Borough more attractive to visitors and businesses.	Spatial Principle 4: Stafford Borough Housing growth distribution Spatial Principle 2: Stafford Borough Housing and employment requirements Policy C3: Specialist Housing Policy N2: Climate Change Policy N3: Low Carbon Sources & Renewable Energy Policy N6: Cannock Chase Special Area of Conservation (SAC)	Spatial Principle 7 (SP7) - Supporting the location of new development Policy Stafford 1 - Stafford Town Policy E2 Sustainable Rural Development Policy E5 Major Developed Sites in the Green Belt Policy Stone 1 - Stone Town Policy E1 Local Economy

## 6 Mitigation

SA Objective	Description of minor negative or uncertain effects	Policy minor negative or uncertain effect applies	Policies offering mitigation to identified negative or uncertain effects
			Policy E3 Development within Recognised Industrial Estates Policy E8 Town, Local and Other Centres
4	The main minor negative or uncertain effects identified in relation to Sustainability Appraisal Objective 4 is how the plan will impact and be implemented in the rural area. The majority of effects outlined can be considered positive effects when implemented alongside other plan policies.	Policy Stone 2: West and South of Stone Policy C3: Specialist Housing Policy N3: Low Carbon Sources & Renewable Energy	SPATIAL PRINCIPLE 6 (SP6) – ACHIEVING RURAL SUSTAINABILITY Spatial Principle 7 (SP7) - Supporting the location of new development– SUPPORTING THE LOCATION OF NEW DEVELOPMENT
5	There are many polices that do not specifically mention impacts from climate change, in particularly flood risk. However it is considered that effects would be mitigated when implemented alongside other plan policies.	Spatial Principle 2: Stafford Borough Housing and employment requirements Spatial Principle 3: Sustainable Settlement Hierarchy Spatial Principle 4: Stafford Borough Housing growth distribution Spatial Principle 6: Achieving Rural sustainability Spatial Principle 7: Supporting the location of new development Policy E1: Local Economy Policy T1: Transport Policy C2: Affordable Housing Policy C3: Specialist Housing Policy N3: Low Carbon Sources & Renewable Energy	Spatial Principle 7 (SP7) - Supporting the location of new development– SUPPORTING THE LOCATION OF NEW DEVELOPMENT Policy E6 Tourism Policy N4 The Natural Environment & Green Infrastructure
6	There are several policies relating to residential development which do not specifically refer to affordable housing, local needs housing, specialist housing or a range of housing types.	Spatial Principle 3: Sustainable Settlement Hierarchy Policy N7: Cannock Chase AONB	Policy C1 Dwelling Types and Sizes

SA Objective	Description of minor negative or uncertain effects	Policy minor negative or uncertain effect applies	Policies offering mitigation to identified negative or uncertain effects
	However it is considered that effects would be mitigated when implemented alongside overarching housing policies.		<p>Policy C2</p> <p>Affordable Housing</p> <p>Policy C5</p> <p>Residential Proposals outside the Settlement Hierarchy</p> <p>Spatial Principle 6 (SP6) - Achieving Rural Sustainability</p> <p>Spatial Principle 7 (SP7) - Supporting the location of new development—SUPPORTING THE LOCATION OF NEW DEVELOPMENT</p>
7	There are many negative or uncertain effects in relation to sustainability appraisal objective 7. This is specially in relation to access to services and facilities. It is considered when all policies are considered together, access to services and facilities as well as access to education and healthcare is integrated into the plan. It is essential that effects are monitored, as outlined in the monitoring framework.	<p>Spatial Principle 2: Stafford Borough Housing and employment requirements</p> <p>Spatial Principle 6: Achieving Rural sustainability</p> <p>Policy C2: Affordable Housing</p> <p>Policy C6: Provision for Gypsies, Travellers &amp; Travelling Show-people</p> <p>Policy N5: Sites of European, National &amp; Local Nature Conservation Importance</p> <p>Policy N6: Cannock Chase Special Area of Conservation (SAC)</p>	<p>Spatial Principle 7 (SP7) - Supporting the location of new development</p> <p>Policy E1</p> <p>Local Economy</p> <p>Policy C7</p> <p>Open Space, Sport and Recreation</p> <p>Policy T1</p> <p>Transport</p> <p>Policy I1</p> <p>Infrastructure Delivery Policy</p> <p>Policy N4</p> <p>The Natural Environment &amp; Green Infrastructure</p>
8	Several policies do not specifically mention crime prevention measures. However uncertain effects identified through the employment requirements	Spatial Principle 2: Stafford Borough Housing and employment requirements	N1 - Design

6 Mitigation

SA Objective	Description of minor negative or uncertain effects	Policy minor negative or uncertain effect applies	Policies offering mitigation to identified negative or uncertain effects
	<p>appraisal process will be mitigated against when implemented alongside the design policy.</p>	<p>Spatial Principle 3: Sustainable Settlement Hierarchy                      Spatial Principle 4: Stafford Borough Housing growth distribution                      Spatial Principle 5: Stafford Borough employment growth distribution                      Spatial Principle 6: Achieving Rural sustainability                      Spatial Principle 7: Supporting the location of new development                      Policy Stafford 1: Stafford Town                      Policy Stafford 2: North of Stafford                      Policy Stafford 3: East of Stafford                      Policy Stafford 4: West of Stafford                      Policy Stone 1: Stone Town                      Policy Stone 2: West and South of Stone                      Policy E1: Local Economy                      Policy E4: Raleigh Hall &amp; Ladfordfields Recognised Industrial Estates                      Policy E5: Major Developed Sites in the Green Belt                      Policy E6: Tourism                      Policy T2: Parking and Manoeuvring Facilities                      Policy C1: Dwelling Types and Sizes                      Policy C2: Affordable Housing                      Policy C3: Specialist Housing                      Policy C4: Housing Conversions and Subdivisions</p>	

SA Objective	Description of minor negative or uncertain effects	Policy minor negative or uncertain effect applies	Policies offering mitigation to identified negative or uncertain effects
		<p>Policy C5: Residential Proposals outside the Settlement Hierarchy</p> <p>Policy C6: Provision for Gypsies, Travellers &amp; Travelling Show-people</p> <p>Policy N4: The Natural Environment &amp; Green Infrastructure</p> <p>Policy N7: Cannock Chase AONB</p> <p>Policy N9: Historic Environment</p>	
9	<p>Several policies do not specifically mention noise and light impacts which has resulted in uncertain or negative effects as part of the appraisal process. It is considered that there is sufficient protection of noise and light impacts in the plan contained in other policies.</p>	<p>Spatial Principle 2: Stafford Borough Housing and employment requirements</p> <p>Spatial Principle 3: Sustainable Settlement Hierarchy</p> <p>Spatial Principle 6: Achieving Rural sustainability</p> <p>Spatial Principle 7: Supporting the location of new development</p> <p>Policy Stafford 2: North of Stafford</p> <p>Policy Stafford 3: East of Stafford</p> <p>Policy Stafford 4: West of Stafford</p> <p>Policy Stone 1: Stone Town</p> <p>Policy Stone 2: West and South of Stone</p> <p>Policy T2: Parking and Manoeuvring Facilities</p> <p>Policy C2: Affordable Housing</p> <p>Policy C6: Provision for Gypsies, Travellers &amp; Travelling Show-people</p> <p>Policy N6: Cannock Chase Special Area of Conservation (SAC)</p>	<p>Spatial Principle 1 (SP1) - Presumption in favour of sustainable development</p> <p>Policy E8</p> <p>Town, Local and Other Centres</p> <p>Policy C3</p> <p>Specialist Housing</p> <p>Policy N1</p> <p>Design</p> <p>Policy N3</p> <p>Low Carbon Sources &amp; Renewable Energy</p> <p>Policy N2</p> <p>Climate Change</p> <p>Policy N4</p> <p>The Natural Environment &amp; Green Infrastructure</p> <p>Policy N8</p> <p>Landscape Character</p>

6 Mitigation

SA Objective	Description of minor negative or uncertain effects	Policy minor negative or uncertain effect applies	Policies offering mitigation to identified negative or uncertain effects
10	<p>The purpose of appraising policies against Sustainability Appraisal Objective 10 is to ensure the plan will result in all people having access to public open space within a reasonable distance from where they live, improving access to natural greenspace and encouraging healthy lifestyles. Several policies show an uncertain effect in relation to this objective. However it is considered that overall the plan aims to encourage healthy lifestyles. It is essential that effects and access is monitored, as outlined in the monitoring framework.</p>	<p>Spatial Principle 2: Stafford Borough Housing and employment requirements                      Spatial Principle 3: Sustainable Settlement Hierarchy                      Policy C2: Affordable Housing                      Policy N6: Cannock Chase Special Area of Conservation (SAC)</p>	<p>Spatial Principle 1 (SP1) - Presumption in Favour of Sustainable Development                      Policy N4                      The Natural Environment &amp; Green Infrastructure                      Policy N2                      Climate Change                      Policy N5                      Sites of European, National &amp; Local Nature Conservation Importance</p>
11	<p>The purpose of appraising policies against this objective is to ensure that the plan will minimise greenhouse gas emissions, will reduce carbon dioxide emissions, will utilise existing infrastructure, will lead to reduced consumption of materials and resources, will it lead to an increased proportion of energy needs being met from renewable sources and increase energy efficiency. It is considered that the implementation of an overarching policy and positive approach to renewable and low carbon development will mitigate against uncertain and minor negative effects identified through the appraisal process. As climate change and opportunities for growth in the low carbon and renewable sector have been identified as a sustainability issue it is considered further mitigation will be required through amendments to policies Policy E4: Raleigh Hall &amp; Ladfordfields Recognised Industrial Estates and Policy Stafford 1: Stafford Town.</p>	<p>Policy Stafford 1: Stafford Town                      Spatial Principle 2: Stafford Borough Housing and employment requirements                      Spatial Principle 5: Stafford Borough employment growth distribution                      Policy Stafford 2: North of Stafford                      Policy Stafford 3: East of Stafford                      Policy Stafford 4: West of Stafford                      Policy Stone 2: West and South of Stone                      Policy E1: Local Economy                      Policy C1: Dwelling Types and Sizes                      Policy C2: Affordable Housing                      Policy C3: Specialist Housing                      Policy N6: Cannock Chase Special Area of Conservation (SAC)</p>	<p>Spatial Principle 6 (SP6) – Achieving rural sustainability                      Policy N2                      Climate Change                      Policy N3                      Low Carbon Sources &amp; Renewable Energy                      Policy N4                      The Natural Environment &amp; Green Infrastructure                      Amendments to Policy E4: Raleigh Hall &amp; Ladfordfields Recognised Industrial Estates and Policy Stafford 1: Stafford Town</p>

SA Objective	Description of minor negative or uncertain effects	Policy minor negative or uncertain effect applies	Policies offering mitigation to identified negative or uncertain effects
12	Loss of biodiversity habitats has been identified as a key sustainability issue. The appraisal of policies has resulted in the identification of several uncertain or minor negative effects. It is considered that the implementation of all policies will mitigate against these effects.	<p>Spatial Principle 2: Stafford Borough Housing and employment requirements</p> <p>Policy T1: Transport</p> <p>Policy C2: Affordable Housing</p> <p>Policy C3: Specialist Housing</p> <p>Policy C4: Housing Conversions and Subdivisions</p>	<p>Spatial Principle 7 (SP7) - Supporting the location of new development</p> <p>Policy E6</p> <p>Tourism</p> <p>Policy N1</p> <p>Design</p> <p>Policy N4</p> <p>The Natural Environment &amp; Green Infrastructure</p> <p>Policy N5</p> <p>Sites of European, National &amp; Local Nature Conservation Importance</p> <p>Policy N8</p> <p>Landscape Character</p>
13	There are many uncertain and negative effects in relation to sustainability appraisal objective 13, mainly as a result of the loss of greenfield land. The Plan as a whole aims to where possible to use brownfield land whilst also recognising that there will be a need for greenfield development to meet objectively assessed needs as set out by the National Planning Policy Framework. Further recommendations are made for Policy Stafford 1 - Stafford Town.	<p>Spatial Principle 2: Stafford Borough Housing and employment requirements</p> <p>Spatial Principle 4: Stafford Borough Housing growth distribution</p> <p>Policy Stafford 1: Stafford Town</p> <p>Policy Stafford 2: North of Stafford</p> <p>Policy Stafford 3: East of Stafford</p> <p>Policy Stafford 4: West of Stafford</p> <p>Policy Stone 1: Stone Town</p> <p>Policy Stone 2: West and South of Stone</p>	<p>Amendments to Policy Stafford 1 - Stafford Town</p> <p>Spatial Principle 7 (SP7) - Supporting the location of new development</p> <p>Policy E2</p> <p>Sustainable Rural Development</p> <p>Policy E5</p> <p>Major Developed Sites in the Green Belt</p>



## 6 Mitigation

SA Objective	Description of minor negative or uncertain effects	Policy minor negative or uncertain effect applies	Policies offering mitigation to identified negative or uncertain effects
		<p>Policy E4: Raleigh Hall &amp; Ladfordfields Recognised Industrial Estates</p> <p>Policy E6: Tourism</p> <p>Policy T1: Transport</p> <p>Policy C1: Dwelling Types and Sizes</p> <p>Policy C2: Affordable Housing</p> <p>Policy C6: Provision for Gypsies, Travellers &amp; Travelling Show-people</p> <p>Policy N3: Low Carbon Sources &amp; Renewable Energy</p>	
14	<p>The appraisal of The Plan concludes that the implementation of several policies in isolation could result in several uncertain or negative effects. It is considered that the implementation of the whole plan, in particular those policies that refer to the Water Framework Directive and known local water resource issues will act as mitigation for the plan.</p>	<p>Spatial Principle 2: Stafford Borough Housing and employment requirements</p> <p>Spatial Principle 3: Sustainable Settlement Hierarchy</p> <p>Spatial Principle 4: Stafford Borough Housing growth distribution</p> <p>Policy E3: Development within Recognised Industrial Estates</p> <p>Policy T1: Transport</p> <p>Policy C1: Dwelling Types and Sizes</p> <p>Policy C2: Affordable Housing</p> <p>Policy C3: Specialist Housing</p> <p>Policy C4: Housing Conversions and Subdivisions</p> <p>Policy N3: Low Carbon Sources &amp; Renewable Energy</p>	<p>Policy N2</p> <p>Climate Change</p> <p>Policy N4</p> <p>The Natural Environment &amp; Green Infrastructure</p> <p>Policy N5</p> <p>Sites of European, National &amp; Local Nature Conservation Importance</p>
15	<p>The appraisal process has identified several uncertain effects in relation to sustainability appraisal objective 15. It is considered that the plan provides sufficient mitigation for such effects through the implementation of other policies.</p>	<p>Spatial Principle 2: Stafford Borough Housing and employment requirements</p> <p>Spatial Principle 3: Sustainable Settlement Hierarchy</p>	<p>Policy N4</p> <p>The Natural Environment &amp; Green Infrastructure</p>

SA Objective	Description of minor negative or uncertain effects	Policy minor negative or uncertain effect applies	Policies offering mitigation to identified negative or uncertain effects
		<p>Spatial Principle 4: Stafford Borough Housing growth distribution</p> <p>Policy Stafford 3: East of Stafford</p> <p>Policy Stafford 4: West of Stafford</p> <p>Policy T2: Parking and Manoeuvring Facilities</p>	<p>Policy N5</p> <p>Sites of European, National &amp; Local Nature Conservation Importance</p> <p>Policy N6</p> <p>Cannock Chase Special Area of Conservation (SAC)</p> <p>Policy N7</p> <p>Cannock Chase AONB</p> <p>Policy N8</p> <p>Landscape Character</p> <p>Policy N9</p> <p>Historic Environment</p>
16	<p>There is one policy which could have an effect on community belonging and well being which is policy N6. This is due to the sensitive nature of Cannock Chase SAC, management of visitors may have a negative effect on community belonging and well being. It is considered that the implementation of Policy N7 and the implementation of the AONB Management Plan, the effect could be positive. It is important that mitigation measures in association with Cannock Chase SAC are monitored to ensure they are successful.</p>	<p>Policy N6: Cannock Chase Special Area of Conservation (SAC)</p>	<p>Policy N7 Cannock Chase</p> <p>Cannock Chase SAC Mitigation and Implementation Strategy</p>
17	<p>Overall there are many uncertain effects in relation to Sustainability Appraisal Objective 17. It is considered that the plan as a whole strives to meet all needs of the community by delivering well designed sustainable developments which are well integrated into the existing area.</p>	<p>Spatial Principle 2: Stafford Borough Housing and employment requirements</p>	<p>N1 Design</p>
18	<p>Sustainability Appraisal Objective 18 relates to local engagement with decision making. The Plan refers to masterplanning, parish plans and encouraging neighbourhood plans which will all involve a level of community involvement and agreement. The Plan should also be considered alongside the Statement of Community Engagement. It is</p>	<p>Spatial Principle 2: Stafford Borough Housing and employment requirements</p> <p>Spatial Principle 3: Sustainable Settlement Hierarchy</p> <p>Spatial Principle 4: Stafford Borough Housing growth distribution</p>	<p>Spatial Principle 7 (SP7) - Supporting the location of new development</p> <p>Strategic Development Locations Policies</p> <p>Stafford Borough Sustainable Community Action Plan</p>

## 6 Mitigation

SA Objective	Description of minor negative or uncertain effects	Policy minor negative or uncertain effect applies	Policies offering mitigation to identified negative or uncertain effects
	important that future planning applications and subsequent planning policy documents involve community consultation.	Spatial Principle 5: Stafford Borough employment growth distribution Spatial Principle 6: Achieving Rural sustainability Spatial Principle 7: Supporting the location of new development Policy Stafford 1: Stafford Town	Ensuring that the policies are implemented fully - see monitoring framework
19	It is recognised in the appraisal process that the Plan will not result in major positive effect in relation to the voluntary sector. Overall several policies could contribute to the increase the work carried out by voluntary groups relating to conservation, sport and recreation. It is important that this is monitored across the plan period.	Policy Stafford 1: Stafford Town Policy N6: Cannock Chase Special Area of Conservation (SAC)	Strategic Development Location policies Policy C7 Open Space, Sport and Recreation N7 Cannock Chase AONB Implementation of Cannock Chase Management Plan Stafford Borough Sustainable Community Action Plan
20	Overall it is considered that the implementation of all policies as a package will lead to a more economically viable Borough with sufficient housing to meet needs and a healthy, accessible environment leading to greater well being for local and future residents and visitors.	Spatial Principle 2: Stafford Borough Housing and employment requirements	All other policies

**6.2** It is important that the following mitigation is considered as part of project consents and subsequent DPDs:

- Mitigation of Cannock Chase SAC
- Community Engagement in line with the Statement of Community Involvement and regulations on consultation
- When making decisions refer to local strategies, particularly the biodiversity strategy, open space strategy to ensure relevant provisions are made through the planning application process

**6.3** The monitoring of effects will assist with ensuring that mitigation is delivered along with ensuring no further effects are identified as a result of implementing the plan.

### 6.1 Monitoring Table

**6.4** The SA of The Plan for Stafford Borough identifies the following positive effects:

- Employment rate
- Employment land
- Delivery of a range of housing types and tenures to meet identified need
- Protection and enhancement of natural environment, water resources, historic environment and local character of towns and villages
- Improved access to services and facilities
- Reduction in contributions to climate change

**6.5** The SA identifies the following negative effects:

- Impact on soil in terms of greenfield land development
- No reduction in carbon emissions in relation to some policies

**6.6** Against some of the SA Objectives, the appraisal identified many uncertain effects which will depend on the implementation of other policies in the plan and incorporation of policy word changes recommended in the appraisal. It is essential that for all effects, monitoring is carried out. The SEA Directive only requires monitoring of likely significant effects, however a monitoring framework looking at a range of indicators for each SA Objective is provided below.

**6.7** As part of the Development Plan system introduced by the Planning and Compulsory Purchase Act in September 2004 an Annual Monitoring Report must be prepared by the end of December each year. Whilst the Localism Act has made some amendments regarding monitoring, Stafford Borough Council are committed to producing an annual monitoring report in order to evaluate the effectiveness of the new Local Plan and determine if any changes are subsequently required. The following monitoring framework will be produced alongside the annual monitoring report.

Table 13 Monitoring of likely significant effects

SA Objective and Policy	Indicator and Policy linked to significant effect	General monitoring or linked to specific policy	Where does monitoring data come from?	How often is data monitored?	When action should be considered?	What action should be considered?
To create high, stable and equitable levels of employment	Employment rate	Policy E1 - Local Economy	NOMIS	Annually July – June	Significant decrease in employment rate	Consideration of allocating additional employment sites
To ensure high and stable levels of economic diversity and competitiveness that recognises social and environmental issues	Amount of employment land lost to residential development	Policy E1 - Local Economy	Annual Monitoring Report	Annually April – March	Significant increase in employment land lost to residential development	Consider change in policy to offer employment land greater protection
	% Increase in total VAT registered businesses	Policy E1 - Local Economy	Audit Commission	Annually	Decrease in total VAT registered businesses	Further study into employment land and infrastructure

## 6 Mitigation

SA Objective and Policy	Indicator and Policy linked to significant effect	General monitoring or linked to specific policy	Where does monitoring data come from?	How often is data monitored?	When action should be considered?	What action should be considered?
To sustain the vitality and viability of Stafford Borough's towns and villages, and their communities	Amount of floorspace by employment type which is on Previously Developed Land	Policy E1 - Local Economy	Annual Monitoring Report	Annually April – March	Significant decline in employment on previously developed land	Consider revising site allocations and looking at additional sites in subsequent sites and allocations DPD
	Amount of employment land and buildings not being used	Policy E1 - Local Economy	Annual Monitoring Report	Annually April – March	High rise in number of empty units and undeveloped land	Investigate individual sites to understand any infrastructure or marketing issues
	Amount of floorspace by employment type	Policy E1 - Local Economy Strategic Development Locations	Annual Monitoring Report	Annually April – March	Significant decline in employment land and range of employment types	Consider revising site allocations and looking at additional sites in subsequent sites and allocations DPD
	Amount of completed retail, office and leisure development	Policy E8 Town, Local and Other Centres	Annual Monitoring Report	Annually April – March	Development not meeting targets set out in the Development Strategy	Consider ways of delivering retail, office and leisure development including Area Action Plans and revising site allocations
	Amount of completed retail, office and leisure development in town centres	Policy E8 Town, Local and Other Centres	ODPM	Annually	Increase in % of land that is derelict	Consider setting target for development on PDL
	% of land that is derelict	Spatial Principle SP7 - Supporting The location of new development	Not currently monitored - data will come from monitoring of planning application approvals	Annually	Significant permissions outside settlement hierarchy	Consider moratorium on housing Review development strategy
Amount of development outside the settlement hierarchy	Spatial Principle 3 (SP3) - Stafford Borough Sustainable Settlement Hierarchy					

SA Objective and Policy	Indicator and Policy linked to significant effect	General monitoring or linked to specific policy	Where does monitoring data come from?	How often is data monitored?	When action should be considered?	What action should be considered?
To sustain the vitality and viability of Stafford Borough's towns and villages, and their communities	% of vacant units in town centres	Spatial Principle 4 (SP4) - Stafford Borough Housing Growth Distribution Spatial Principle 7 (SP7) - Supporting the Location of New Development Policy E8 Town, Local and Other Centres	GOAD	Annually	Significant completions within tiers of hierarchy in early part of plan period Increase in % of units in town centres	Consider Area Action Plan for Town centres
	% of empty homes	General Policy E8 Town, Local and Other Centres	The Empty Homes Agency	Annually	Increase in % of empty homes	Work with housing agencies to ensure empty homes are brought back into use
To support the needs of the local rural economy and communities	Rank of town centres	Policy E8 Town, Local and Other Centres	British Retail Consortium	Annually	Stafford town centre falls in rank of town centres	Consider Area Action Plan for town centre
	% of dwellings within 350 metres of 30 minute bus route	Spatial Principle SP7 - Supporting The location of new development Policy Stafford 1 - Stafford Town Policy Stone 1 - Stone Town Policy E1	Staffordshire County Council monitoring	Annually April – March	Decrease in % of dwellings within 350 metres of 30 minute bus route	Work with delivery agencies to ensure the delivery of adequate services and facilities



## 6 Mitigation

SA Objective and Policy	Indicator and Policy linked to significant effect	General monitoring or linked to specific policy	Where does monitoring data come from?	How often is data monitored?	When action should be considered?	What action should be considered?	
To reduce vulnerability to the effects of climate change such as risk of flooding, on public well-being, the economy and the environment.  To ensure that everyone has the opportunity of a decent and affordable home	Number of planning permissions granted contrary to advice of Environment Agency	Local Economy Policy E2 Sustainable Rural Development	Annual Monitoring Report	Annually April - March	Planning permissions granted contrary to advice of EA	Review of flood risk policy and Strategic Flood Risk Assessment	
	Number of affordable housing completions	Policy C2 Affordable Housing	Annual Monitoring Report	Annually April – March	Significant decline in affordable housing completions	Alterations to thresholds for affordable housing	
	Number of homes incorporating lifetime home standards	Policy C2 - Affordable housing	Not currently monitored - to be done through monitoring of planning applications	Annually	No new dwellings incorporating lifetime home standards	Consider partnership working with building control to develop design SPD	
	Affordability Ratio – House price / earnings	General	Audit Commission	Annually	Significant increase in affordability ratio	Alterations to thresholds for affordable housing	
	Number of applications incorporating affordable housing	Policy C2 Affordable Housing	Stafford Borough Council Planning Applications	Annually	Significant decrease in number of affordable housing incorporated into housing schemes	Alterations to thresholds for affordable housing  Consider delivery of affordable housing off site	

SA Objective and Policy	Indicator and Policy linked to significant effect	General monitoring or linked to specific policy	Where does monitoring data come from?	How often is data monitored?	When action should be considered?	What action should be considered?
	Number of applications incorporating or relating specifically to specialist housing	C3 - Specialist housing	Stafford Borough Council Planning Applications	Annually	No schemes coming forward	Introduction of thresholds for specialist housing Partnership working with specialist housing stakeholders
	Number of unfit dwellings	General	Housing Improvement Programme (HIP) returns	Annually	Significant increase in number of unfit dwellings	Consider ways of improving the current housing stock
	Homelessness	General	CLG	Annually	Significant increase in number of homeless households	Consider ways of reducing levels of homelessness
To ensure that everyone has the opportunity of a decent and affordable home	Number of authorised Gypsy and traveller sites	Policy C6 Provision for Gypsies, Travellers & Travelling Show-people	Stafford Borough Council Planning Applications	Annually	Needs of the GTAA not being met	Consider producing Sites and Allocations document identifying sites as soon as possible
To ensure that everyone has the opportunity of a decent and affordable home	Number of specialist housing completions	Policy C3 Specialist Housing	Stafford Borough Council Planning Applications	Annually	No specialist housing completions	Consider producing Sites and Allocations document identifying sites as soon as possible
To improve opportunities for access for all to work, education, health and local services	Amount of new residential development within 30 minutes public transport time of a GP, hospital, primary school, secondary school, areas of employment and major retail centres	Policy T1 Transport	Annual Monitoring Report	Annually April – March	Significant development not being delivered within 30 minutes public transport time of services.	Consideration of site allocations, developer contributions and public transport provision

## 6 Mitigation

SA Objective and Policy	Indicator and Policy linked to significant effect	General monitoring or linked to specific policy	Where does monitoring data come from?	How often is data monitored?	When action should be considered?	What action should be considered?
	Index of Multiple Deprivation	General	Office of National Statistics	2004	Increase in population living in areas of high deprivation	Consideration of site allocations, developer contributions and public transport provision
	Access to Services	Policy T1 Transport	Commission for Rural Communities	Annually	Significant loss of services	Consideration of policy review to offer greater protection of services
To reduce and prevent crime, and reduce the fear of crime	Number of notifiable crimes per 1,000 population	General	Staffordshire Police	Annually	Significant increase in number of notifiable crimes per 1,000 population	Production of specific design SPD
To reduce the impact of noise and light pollution	Number of IPPC breaches recorded	Spatial Principle 1 (SP1) - Presumption in Favour of Sustainable Development	Environment Agency	Uncertain – Annually	Increase in number of IPPC breaches recorded	Review of Development Control policies and possible production of SPD on design and building standards
To improve health, safety and well-being across the whole community	Area of outdoor sport provision	Policy C7 Open Space, Sport and Recreation	PPG17 Assessments	In line with LDF review	Decrease in are of outdoor sport provision and open space	Use of planning obligations and conditions. Review of open space policy
	Accessible Natural Greenspace Standard	Policy N4 The Natural Environment & Green Infrastructure	Stafford Borough Council Planning Applications	Annually	Approved planning applications not meeting ANGST	Review of Development Control policies and production of Green Infrastructure SPD setting out standards

SA Objective and Policy	Indicator and Policy linked to significant effect	General monitoring or linked to specific policy	Where does monitoring data come from?	How often is data monitored?	When action should be considered?	What action should be considered?
To reduce societal contributions to climate change	Renewable energy capacity installed by type	Policy N3 Low Carbon Sources & Renewable Energy	Annual Monitoring Report	Annually April – March	Required sites are not delivering 10% on-site renewable energy	Possible change in planning obligations or renewable energy targets and policy
	% of household waste used to recover heat, power and other energy sources	Policy N3 Low Carbon Sources & Renewable Energy	AC Knowledge and Data – only measured at County level	Annually	No increase in % of household waste used to recover heat, power and other energy sources	Consideration of allocating sites for delivering renewable energy
	Total emissions of CO2	Policy N3 Low Carbon Sources & Renewable Energy	Defra – Nuts4 data	Annually	Significant increase in CO2 emissions	Increase the on-site renewable energy requirement, stronger emphasis on sustainable locations
	Accessible Natural Greenspace Standard	Policy N4 The Natural Environment & Green Infrastructure	Stafford Borough Council Planning Applications	Annually	Approved planning applications not meeting ANGST	Review of Development Control policies and production of Green Infrastructure SPD setting out standards
To reduce societal contributions to climate change	Overall % improvement in domestic energy efficiency	Policy N3 Low Carbon Sources & Renewable Energy	Defra	Annually April – March	Decline or reduction in growth of energy efficiency	Work with infrastructure and delivery agencies to consider ways of improving energy efficiency
	Amount of new residential development within 30 minutes public transport time of a GP, hospital, primary school, secondary	Spatial Principle 1 (SP1) - Presumption in Favour of Sustainable Development	Annual Monitoring Report	Annually	Significant development not being delivered within 30 minutes public transport time of services.	Consideration of site allocations, developer contributions and public transport provision

## 6 Mitigation

SA Objective and Policy	Indicator and Policy linked to significant effect	General monitoring or linked to specific policy	Where does monitoring data come from?	How often is data monitored?	When action should be considered?	What action should be considered?
To protect and enhance biodiversity	school, areas of employment and major retail centres					
	% of new development incorporating water efficiency techniques	Policy N3 Low Carbon Sources & Renewable Energy	Not currently monitored - To be through Stafford Borough Council Planning Applications	Not currently monitored - to be done annually	No new developments deliver water saving techniques	Consider amendments to planning policy to require water saving techniques
	% of new homes meeting code for sustainable homes standard	Policy N3 Low Carbon Sources & Renewable Energy	Not currently monitored - To be through Stafford Borough Council Planning Applications	Not currently monitored - to be done annually	New developments not meeting code for sustainable homes standards	Consider ways of improving the sustainability rating of new homes
	Change in priority habitats and species	Policy N4 The Natural Environment & Green Infrastructure	Annual Monitoring Report	Annually April – March	Condition gets worse	Consider ways of improving biodiversity protection and enhancement, working with other departments in the authority, Staffordshire County Council and Staffordshire Wildlife Trust
	Change in areas designated for their intrinsic environmental value	Policy N4 The Natural Environment & Green Infrastructure Policy N5 Sites of European, National & Local Nature Conservation Importance	Natural England	Annually	Condition gets worse	

SA Objective and Policy	Indicator and Policy linked to significant effect	General monitoring or linked to specific policy	Where does monitoring data come from?	How often is data monitored?	When action should be considered?	What action should be considered?
	Percentage of SSSI's in 'favourable' condition	Policy N5 Sites of European, National & Local Nature Conservation Importance	Natural England	Annual (However EN rolling cycle of 6 years)	Condition gets worse	
	To achieve targets as set out in the Staffordshire Biodiversity Action Plan (SBAP)	Policy N4 The Natural Environment & Green Infrastructure  Policy N5 Sites of European, National & Local Nature Conservation Importance	The Wildlife Trust	Unknown, most recent survey in 2002	Condition gets worse	
	Developments providing biodiversity enhancements on site or through contributions to other schemes	Policy N4 The Natural Environment & Green Infrastructure  Policy N5 Sites of European, National & Local Nature Conservation Importance	Not currently monitored - to be done in partnership with Stafford Borough Council and Staffordshire Wildlife Trust	Annually	No enhancement schemes being delivered through the planning process	Investigate reasons why no schemes being delivered and produce action plan



## 6 Mitigation

SA Objective and Policy	Indicator and Policy linked to significant effect	General monitoring or linked to specific policy	Where does monitoring data come from?	How often is data monitored?	When action should be considered?	What action should be considered?
To protect and conserve soil	% of new and converted dwellings on previously developed land	Spatial Principle 1 (SP1) - Presumption in Favour of Sustainable Development Spatial Principle SP7 - Supporting The location of new development	Annual Monitoring Report The Housing Monitor: Land for New Homes	Annually April – March	Significant decline in % of new dwellings on previously developed land	Consider phasing or alternative release of allocated sites along with allocating alternative sites for housing development
To protect and enhance water quality of the Borough's rivers whilst maximising their carrying capacity and achieving sustainable water resource management.	Number of planning permissions granted contrary to advice of Environment Agency	Policy N2 Climate Change	Annual Monitoring Report	Annually	Planning permissions granted contrary to advice of Environment Agency	Consider revising water resources policy, including the requirement for sustainable drainage techniques
	% of rivers with good biological / chemical records	Policy N2 Climate Change Policy N5 Sites of European, National & Local Nature Conservation Importance	Defra	Annually	No reasonable improvements achieved in plan period	Investigation of water saving techniques and control of waste water as close to the source as possible
	% of new development incorporating water efficiency techniques	Policy N2 Climate Change	Not currently monitored	Not currently monitored	No new developments deliver water saving techniques	Consider amendments to planning policy to require water saving techniques
To protect, enhance and, where necessary, restore designated landscape areas and town character, scenic	Number / % of Listed Buildings and Scheduled Ancient Monuments at Risk	Policy N9 Historic Environment	English Heritage	Annually	Increase in the number of buildings at risk	Consider ways of improving buildings at risk

SA Objective and Policy	Indicator and Policy linked to significant effect	General monitoring or linked to specific policy	Where does monitoring data come from?	How often is data monitored?	When action should be considered?	What action should be considered?
beauty, local distinctiveness, and historic and cultural character.	Accessible Natural Greenspace Standard	Policy N4 The Natural Environment & Green Infrastructure	Stafford Borough Council Planning Applications	Annually	Approved planning applications not meeting ANGST	Review of Development Control policies and production of Green Infrastructure SPD setting out standards
To protect, enhance and, where necessary, restore designated landscape areas and town character, scenic beauty, local distinctiveness, and historic and cultural character.	Number of conservation areas with appraisals	Policy N9 Historic Environment	Monitored through Local Plan evidence base	To be done annually	No conservation area appraisals being produced	Investigate reasons why conservation areas do not have appraisals
To create a sense of community identity and belonging	Population change	General	Staffordshire County Council	Annually	Significant decrease in population	Investigate patterns of population change and relationship with housing and employment
To ensure tolerance, respect and engagement with people from different cultures, backgrounds and beliefs recognising their rights and responsibilities	% of residents who think that people being attacked because of their skin colour, ethnic origin or religion is a very big or fairly big problem in their local area	General	Audit Commission	Annually	Significant increase in % of residents who think this is a problem in their local area.	Investigate ways to 'design out crime' through the planning process.
To ensure that all individuals and groups in society have the opportunity to effectively engage in issues relating to their community	E-enabled interactions as a proportion of all interactions	General	Not currently monitored	To be done annually	No consultations taking place	Produce action plan setting out how planning consultations will take place

## 6 Mitigation

SA Objective and Policy	Indicator and Policy linked to significant effect	General monitoring or linked to specific policy	Where does monitoring data come from?	How often is data monitored?	When action should be considered?	What action should be considered?
	Number of DPD's compliant with the Statement of Community Involvement (SCI)	General	Not currently monitored / not yet applicable	To be done annually	DPDs and planning applications not complying with SCI	Produce action plan setting out how planning consultations will take place
To encourage a strong, inclusive, community and voluntary sector	% of voluntary / community organisations performing well	General	Not currently monitored - to be monitored in partnership with Stafford Borough Policy team	To be done annually	Significant drop in voluntary groups performance	Investigate ways for partnership working between the LPA and the VCS
To engender a sense of civic and neighbourhood values, responsibility and pride	Well-being score	General	Opinions and Lifestyle Survey (OPN) - Opinions and Lifestyle Survey (OPN)	Unknown, most recent survey in 2011	Significant drop in well being score	Investigate ways to include more people in the decision making process, factors influencing peoples well being and delivery of infrastructure process

## 7 Next Steps

### Next Steps

**7.1** The results of this Revised Sustainability Appraisal Report along with the results from public consultation, will be fed back into the '**The Plan for Stafford Borough - Submission**' documentation, which will be submitted to the Secretary of State and considered at examination in 2013.

**7.2** This report and technical appendices has been sent to the three statutory consultees; Natural England, English Heritage and the Environment Agency for comments. Anyone can make comments on any part of the Revised Sustainability Appraisal Report and technical appendices. Any comments will be considered as part of the examination of the new Local Plan.

**7.3** The documents can be viewed online at [www.staffordbc.gov.uk/publication](http://www.staffordbc.gov.uk/publication) or in the council offices reception at Civic Centre, Riverside, Stafford, ST16 3AQ. The deadline for comments is 12 noon, Thursday 28th February.

## 7 Next Steps

# i Appraisal of development strategy and policies

## Key of Sustainability Appraisal

Major positive	✓ ✓	Major Negative	x x
Minor Positive	✓	Minor Negative	x
Neutral Effect 0		Uncertain / depends on implementation ?	

### Sustainability Appraisal time frames

Short Term	0 - 5 years
Medium term	5 - 10 years
Long term	10 - 20 years

## i.1 Appraisal Table

### Spatial Principle 1: Presumption in favour of sustainable development

SA Obj	Indicators	Effects over time			Comments
		Short	medium	long	
1	Employment rate	✓	✓	✓	Positive effect - applications to be approved in line with development strategy
2	Employment land	✓	✓	✓	Positive effect - applications to be approved in line with development strategy
3	Vacant units	✓	✓	✓	Positive effect - applications to be approved in line with development strategy
4	Farm diversification, affordable housing	✓	✓	✓	Positive effect - applications to be approved in line with development strategy
5	Developments contrary to EA	✓	✓	✓	Development that is subject to flood risk or increases flood risk would not be acceptable
6	Affordable housing	✓	✓	✓	Policy states that other policies will need to be adhered to - including affordable housing requirement
7	Public Transport access	✓	✓	✓	Positive effect - applications to be approved in line with development strategy
8	Crime	✓	✓	✓	Positive effect - applications to be approved in line with development strategy
9	Noise and light impacts	✓	✓	✓	Positive effect - applications to be approved in line with development strategy



i Appraisal of development strategy and policies

**Spatial Principle 1: Presumption in favour of sustainable development**

10	Natural greenspace	✓	✓	✓	✓	Positive effect - applications to be approved in line with development strategy
11	Renewable energy	✓	✓	✓	✓	Positive approach in policy towards development with no unacceptable impacts
12	SSSI quality	✓	✓	✓	✓	Positive effect - applications to be approved in line with development strategy
13	Development on PDL	✓	✓	✓	✓	Positive effect - applications to be approved in line with development strategy
14	River Quality	✓	✓	✓	✓	Development that would have an impact on water quality would not be acceptable
15	Buildings at risk	✓	✓	✓	✓	Positive effect - applications to be approved in line with development strategy
16	Household change	✓	✓	✓	✓	Sustainable development will meet the housing and employment needs of the Borough now and in the future and improve the economic, social and environmental conditions in the area.
17	Attitude to area	✓	✓	✓	✓	Development which improve the economic, social and environmental conditions in the area will improve local attitudes.
18	Compliance with SCI	✓	✓	✓	✓	Policy will allow applications in line with neighbourhood plans to be approved - assuming that neighbourhood plans are in place and have passed the local referendum stage
19	Voluntary organisations	0	0	0	0	Policy alone unlikely to influence level of voluntary activity
20	Wellbeing	✓	✓	✓	✓	Policy will allow applications in line with neighbourhood plans to be approved and improve the economic, social and environmental conditions

Conclusion - Under this policy, development that is unacceptable would not go ahead. Having a policy that relates to the presumption in favour of sustainable development is necessary to have a 'sound' plan as it must be in conformity with the NPPF.

**Spatial Principle 2: Stafford Borough Housing and employment requirements**

SA Obj	Indicators	Effects over time			Comments
		Short	medium	long	
1	Employment rate	✓	✓	✓	Increase in employment land
2	Employment land	✓	✓	✓	Increase in employment land
3	Vacant units	?	?	?	Depends on implementation of strategy
4	Farm diversification, affordable housing	✓	✓	✓	Policy covers the whole Borough
5	Developments contrary to EA	?	?	?	Depends on implementation of strategy
6	Affordable housing	✓	✓	✓	Assume an element of housing to be affordable
7	Public Transport access	?	?	?	Depends on implementation of strategy
8	Crime	?	?	?	Depends on implementation
9	Noise and light impacts	?	?	?	Depends on implementation
10	Natural greenspace	?	?	?	Depends on implementation

**Spatial Principle 2: Stafford Borough Housing and employment requirements**

11	Renewable energy	?	?	?	?	Depends on implementation
12	SSSI quality	?	?	?	?	Depends on implementation
13	Development on PDL	?	?	?	?	Depends on implementation
14	River Quality	?	?	?	?	Depends on implementation
15	Buildings at risk	?	?	?	?	Depends on implementation
16	Household change	✓	✓	✓	✓	Will meet future needs of the Borough in terms of employment and housing
17	Attitude to area	?	?	?	?	Depends on implementation
18	Compliance with SCI	?	?	?	?	Whilst the Plan for Stafford Borough has had several stages of public consultation, further involvement on detailed planning applications and Masterplanning would assist with community involvement in decision making
19	Voluntary organisations	0	0	0	0	Policy alone would not influence level of voluntary activity
20	Wellbeing	?	?	?	?	Depends on implementation

It is considered that the level of housing and employment land provision will meet local needs as well as incorporating an element of growth. Whilst a lot of the impacts will depend on the implementation of the strategy and assessment of other policies, there will be many positive impacts as a result of implementing this policy. For those SA Objectives with an uncertain effect identified, mitigation will be provided by more detailed policies in the plan.

**Spatial Principle 3: Sustainable Settlement Hierarchy**

SA Obj	Indicators	Effects over time			Comments
		Short	medium	long	
1	Employment rate	✓	✓	✓	Will increase opportunities to employment
2	Employment land	✓	✓	✓	Will contribute towards a portfolio of sites
3	Vacant units	✓	✓	✓	Most of the settlements listed in the hierarchy have an element of previously developed land available
4	Farm diversification, affordable housing	✓	✓	✓	Strategy would not preclude development in smaller rural areas
5	Developments contrary to EA	?	?	?	Depends on specific location of development
6	Affordable housing	?	?	?	Depends on site location and size of development
7	Public Transport access	✓	✓	✓	Settlements listed have access to transport, services and facilities
8	Crime	?	?	?	Depends on implementation
9	Noise and light impacts	?	?	?	Depends on implementation
10	Natural greenspace	?	?	?	Depends on implementation
11	Renewable energy	0	0	0	No impact
12	SSSI quality	✓	✓	✓	There are sufficient sites at the settlements without direct impacts on designated sites.
13	Development on PDL	✓	✓	✓	Most of the settlements listed in the hierarchy have an element of previously developed land available

i Appraisal of development strategy and policies

**Spatial Principle 3: Sustainable Settlement Hierarchy**

14	River Quality	?	?	?	?	?	Depends on implementation
15	Buildings at risk	?	?	?	?	?	Depends on implementation
16	Household change	✓	✓	✓	✓	✓	Will meet the housing and employment needs of the Borough
17	Attitude to area	✓	✓	✓	✓	✓	Will lead to less people moving and commuting out of the Borough
18	Compliance with SCI	?	?	?	?	?	Depends on implementation
19	Voluntary organisations	0	0	0	0	0	No significant impact
20	Wellbeing	0	0	0	0	0	No significant impact

Various settlement hierarchies have been assessed in the previous sustainability appraisal documents with the approach set out in Spatial Principle 3 considered the most sustainable due to the sustainability of the Stafford, Stone and larger rural settlements. Previous sustainability appraisals also recognised that other rural settlements such as Weston, Haughton and Tittensor, due to their location within the Borough and offer of facilities and services could have a role within the development strategy - this has now been incorporated into the strategy. For those SA Objectives with an uncertain effect identified, mitigation will be provided by more detailed policies in the plan such as those relating to design, the environment and affordable housing.

**Spatial Principle 4: Stafford Borough Housing growth distribution**

SA Obj	Indicators	Effects over time			Comments
		Short	medium	long	
1	Employment rate	0	0	0	Whilst delivery of housing could lead to higher employment rate this will not be permanent and influenced by other factors
2	Employment land	0	0	0	Policy does not aim to deliver employment land or specifically lead to the loss of employment land to other uses
3	Vacant units	✓	✓	x	Settlements all have an element of previously developed land. Stafford and Stone do not have the amount required to meet all housing needs through previously developed land
4	Farm diversification, affordable housing	✓	✓	✓	20% of housing to be within the rural area
5	Developments contrary to EA	?	?	?	Depends on specific location in relation to the settlements
6	Affordable housing	✓	✓	✓	Affordable housing to be proportion of the percentages
7	Public Transport access	✓	✓	✓	Settlements listed all have element of public transport, services and facilities
8	Crime	?	?	?	
9	Noise and light impacts	✓	✓	✓	Although depends on specific location the proportions are broadly in line with previous policy
10	Natural greenspace	✓	✓	✓	Stafford, Stone and several of the KSV's have access to natural greenspace, countryside, public rights of way for recreation opportunities

**Spatial Principle 4: Stafford Borough Housing growth distribution**

11	Renewable energy	0	0	0	0	Policy only relates to housing - depends on size of developments and ability to meet energy needs through on site renewable energy
12	SSSI quality	✓	✓	✓	✓	There are sufficient sites at the settlements without direct impacts on designated site
13	Development on PDL	✓	✓	✓	✗	Settlements all have an element of previously developed land. Stafford and Stone do not have the amount required to meet the % target
14	River Quality	?	?	?	?	Depends on implementation of strategy and other policies
15	Buildings at risk	?	?	?	?	Depends on specific location at settlements within the hierarchy
16	Household change	✓	✓	✓	✓	Will meet the housing and employment needs of the Borough
17	Attitude to area	✓	✓	✓	✓	Will lead to less people moving and commuting out of the Borough
18	Compliance with SCI	?	?	?	?	Depends on implementation
19	Voluntary organisations	0	0	0	0	No significant impact
20	Wellbeing	0	0	0	0	No significant impact

This policy sets out the proportions to go to each tier of the hierarchy. Overall the policy is aiming to achieve a strategy that is placed between that set out in the existing Local Plan, adopted in 2001, and what has happened over the last 10 years in terms of planning applications granted planning permission. There is a risk that a similar pattern will take place in that a high number of permissions, without adequate policy wording or effective mechanisms in place, will take place outside of the main settlements as set out in the strategy. Suggested mechanisms are discussed in the sustainability appraisal conclusions and monitoring proposals. For those SA Objectives with an uncertain effect identified, mitigation will be provided by more detailed policies in the plan including landscape considerations, design, affordable housing and environmental constraints.

**Spatial Principle 5: Stafford Borough employment growth distribution**

SA Obj	Indicators	Effects over time			Comments
		Short	medium	long	
1	Employment rate	✓	✓	✓	Increased access to employment opportunities
2	Employment land	✓✓	✓✓	✓✓	Increased employment land provision - with additional headroom considered
3	Vacant units	✓	✓	✓	The policy cross refers to policy SP7 which places emphasis on using brownfield land
4	Farm diversification, affordable housing	✓	✓	✓	The policy cross refers to policy SP7 which would allow development in the rural area
5	Developments contrary to EA	✓	✓	✓	The policy cross refers to policy SP7 which would not allow development in areas of flood or contribute to flood risk elsewhere
6	Affordable housing	0	0	0	Policy relates to employment land provision
7	Public Transport access	✓	✓	✓	The policy cross refers to policy SP7 which would allow development in the rural area

i Appraisal of development strategy and policies

**Spatial Principle 5: Stafford Borough employment growth distribution**

8	Crime	?	?	?	?	Uncertain effect
9	Noise and light impacts	✓	✓	✓	✓	The policy cross refers to policy SP7 which would not allow development where there would be an adverse affect on residential amenity
10	Natural greenspace	✓	✓	✓	✓	The policy cross refers to policy SP7 which would not allow development where there would be a loss of open space
11	Renewable Energy	?	?	?	?	Depends on implementation of strategy and other policies
12	SSSI quality	✓	✓	✓	✓	The policy cross refers to policy SP7 which would not allow development where there would be a loss of impact on biodiversity sites
13	Development on PDL	✓	✓	✓	✓	The policy cross refers to policy SP7 which places emphasis on using brownfield land
14	River Quality	✓	✓	✓	✓	The policy cross refers to policy SP7 which places emphasis on meeting environmental protection policies
15	Buildings at risk	✓	✓	✓	✓	The policy cross refers to policy SP7 which places emphasis on landscape character, local evidence base and the historic environment
16	Household change	✓	✓	✓	✓	Will meet the employment needs of current and future population
17	Attitude to area	✓	✓	✓	✓	Will meet the employment needs of current and future population
18	Compliance with SCI	?	?	?	?	Depends on implementation and nature of planning applications
19	Voluntary organisations	0	0	0	0	Unlikely to have an impact on level of voluntary work
20	Wellbeing	✓	✓	✓	✓	Will meet the employment needs of current and future population leading to greater well being and less need to move elsewhere

Overall this option is continuing with the average provision of employment development over the last 10 years, which meets local employment need as well as providing additional land to attract economic growth. There is the risk the level of provision above that projected for employment need could lead to vacant units along with the development of greenfield land and this should be addressed through monitoring and policy review. For those SA Objectives with an uncertain effect identified, mitigation will be provided by more detailed policies in the plan including contributions to climate change and design.

**Spatial Principle 6: Achieving Rural sustainability**

SA Obj	Indicators	Effects over time			Comments
		Short	medium	long	
1	Employment rate	✓	✓	✓	Aim to allow development in rural areas that contributes towards sustainability
2	Employment land	✓	✓	✓	Aim to allow development in rural areas that contributes towards sustainability
3	Vacant units	✓	✓	✓	Policy specifically addresses re-use of redundant buildings
4	Farm diversification, affordable housing	✓	✓	✓	Policy aims to permit development that contributes towards the sustainability of rural settlements



**Spatial Principle 6: Achieving Rural sustainability**

5	Developments contrary to EA	?	?	?	?	Depends on location of development. Whilst the policy does not specifically refer to flood risk - separate policies would also apply
6	Affordable housing	✓	✓	✓	✓	Policy would allow appropriate rural housing schemes to assist rural communities which would include local needs and affordable housing
7	Public Transport access	?	?	?	?	Policy does not specifically refer to access, however the policy would also apply to development where services or facilities are provided to the rural area
8	Crime	?	?	?	?	Depends on implementation
9	Noise and light impacts	?	?	?	?	Depends on implementation
10	Natural greenspace	?	?	?	?	Whilst the policy does aim to allow development that leads to the conservation or improvement of the rural environment this may not necessarily mean greater access to the natural environment
11	Renewable Energy	✓	✓	✓	✓	Policy aims to permit suitable renewable energy schemes in the rural area
12	SSSI quality	✓	✓	✓	✓	Policy provides adequate protection for environmental assets. There are a high number of designation and locally important sites in the rural area - some of these are close to settlements
13	Development on PDL	✓	✓	✓	0	Policy aims to allow appropriate re-use of redundant buildings.
14	River Quality	✓	✓	✓	✓	Conservation of the rural environment
15	Buildings at risk	✓	✓	✓	✓	Protection of rural character
16	Household change	✓	✓	✓	✓	Aim of the policy is to achieve rural sustainability where need to travel elsewhere for housing, employment and other needs is reduced.
17	Attitude to area	✓	✓	✓	✓	Development which sustains the social and economic fabric of rural communities will improve the attitude to the area
18	Compliance with SCI	?	?	?	?	Depends on specific planning applications and the process for decision making
19	Voluntary organisations	0	0	0	0	Unlikely the policy alone will lead to greater volunteering
20	Wellbeing	✓	✓	✓	✓	Protection of rural character

This overarching strategy policy sets out where applications would be permitted. Further detail in terms of criteria is set out SP7 and this will address some of the uncertain effects identified.

**Spatial Principle 7: Supporting the location of new development**

SA Obj	Indicators	Effects over time			Comments
		Short	medium	long	
1	Employment rate	✓	✓	✓	Aim to allow development in rural areas that contributes towards sustainability
2	Employment land	✓	✓	✓	Aim to allow development in rural areas that contributes towards sustainability
3	Vacant units	✓	✓	✓	Policy specifically addresses re-use of redundant buildings
4	Farm diversification, affordable housing	✓	✓	✓	Policy aims to permit development that contributes towards the sustainability of rural settlements

i Appraisal of development strategy and policies

**Spatial Principle 7: Supporting the location of new development**

5	Developments contrary to EA	?	?	?	Depends on location of development. Whilst the policy does not specifically refer to flood risk - separate policies would also apply
6	Affordable housing	✓	✓	✓	Policy would allow appropriate rural housing schemes to assist rural communities which would include local needs and affordable housing
7	Public Transport access	✓	✓	✓	Policy aims to encourage development that would maintain or increase level of access to services and facilities.
8	Crime	?	?	?	Uncertain effect / depends on implementation
9	Noise and light impacts	?	?	?	Uncertain effect / depends on implementation
10	Natural greenspace	✓	✓	✓	Minor positive through the consideration of the conservation and enhancement actions of particular landscape policy zone / zones affected which could lead to increased access to nature, based on the relevant information and green infrastructure strategy;
11	Renewable Energy	✓	✓	✓	Policy aims to permit suitable renewable energy schemes in the rural area
12	SSSI quality	✓	✓	✓	Policy provides adequate protection for environmental assets. There are a high number of designation and locally important sites in the rural area - some of these are close to settlements
13	Development on PDL	✓	✓	0	Policy aims to allow appropriate re-use of redundant buildings.
14	River Quality	✓	✓	✓	No conflict with environmental protection
15	Buildings at risk	✓	✓	✓	Protection of built environment
16	Household change	✓	✓	✓	Aim of the policy is to achieve rural sustainability where need to travel elsewhere for housing, employment and other needs is reduced.
17	Attitude to area	✓	✓	✓	Consider that the policy will lead to sustainable development in the rural area, addressing local concerns and improving the attitude to the area
18	Compliance with SCI	?	?	?	Depends on applications and the decision making process
19	Voluntary organisations	0	0	0	Unlikely that the policy will influence the level of volunteering
20	Wellbeing	✓	✓	✓	Consider that the policy will lead to sustainable development in the rural area, addressing local concerns and improving the well being to the area
<p>This policy sets out the criteria for appraising both individual applications but also establishing criteria for settlements in the hierarchy and those smaller settlements not in the hierarchy, for setting out a settlement boundary which would establish where development would be acceptable. Overall the policy would allow development which would improve the sustainability of settlements without restricting development to a key number of settlements. There are several uncertain effects which would be addressed through the implementation of other policies in the plan.</p>					

**Policy Stafford 1: Stafford Town**

SA Obj	Indicators	Effects over time			Comments
		Short	medium	long	



Policy Stafford 1: Stafford Town						
1	Employment rate	✓	✓	✓	✓	Policy aims to encourage greater employment within Stafford town
2	Employment land	✓	✓	✓	✓	Policy allocates land for employment purposes and protects land from being lost to other uses
3	Vacant units	✓	✓	✓	✓	The policy allows for the re-use of employment land in certain situations.
4	Farm diversification, affordable housing	0	0	0	0	Policy relates to Stafford. Some development may meet needs of rural area.
5	Developments contrary to EA	0	0	0	0	Whilst parts of Kingsmead, Riverside, and land to the west lie within the flood zone it is considered that consideration of this, along with provision of GI would influence the design of developments to ensure that the development is not at risk of flooding or that flood risk would be increased elsewhere leading to overall no increased risk. Depending on detailed mitigation as part of a planning proposal, the outcome could have a positive effect.
6	Affordable housing	✓	✓	✓	✓	Policy aims to deliver a range of housing to meet the varied needs of Stafford.
7	Public Transport access	✓	✓	✓	✓	Access to services and public transport are a priority within the policy
8	Crime	?	?	?	?	Depends on design/implementation of schemes
9	Noise and light impacts	✓	✓	✓	✓	The policy now considers landscape character. This could be improved further to read landscape and townscape character.
10	Natural greenspace	✓	✓	✓	✓	The policy aims to encourage healthy lifestyles through improved cycling and walking routes and cycle parking
11	Renewable Energy	x	x	x	x	The policy does not refer to low carbon development
12	SSSI quality	✓	✓	✓	✓	The policy aims to protect existing nature sites and create new green infrastructure which contribute to biodiversity protection and enhancement
13	Development on PDL	x	x	x	x	Several of the Key Strategic Locations will involve the loss of greenfield land
14	River Quality	✓	✓	✓	✓	Encouragement of green infrastructure and green links will assist with improving water quality and water quantity
15	Buildings at risk	✓	✓	✓	✓	Policy aims to protect the historic environment and surrounding landscape. As under SA9 - the policy could be improved further to include townscape design considerations
16	Household change	✓	✓	✓	✓	Policy will reduce the number of people needing to move outside of Stafford to meet housing and employment needs
17	Attitude to area	✓	✓	✓	✓	Policy aims to improve Stafford by becoming a key economic location within the region, proving sufficient housing to meet

i Appraisal of development strategy and policies

<b>Policy Stafford 1: Stafford Town</b>					
					local needs as well as achieving high quality new development with social and environment benefits.
18	Compliance with SCI	?	?	?	Depends on implementation and decision making process for specific applications
19	Voluntary organisations	?	?	?	Depends on implementation
20	Wellbeing	✓	✓	✓	Improved access to services, leisure, recreation, housing, employment and enhanced environment will contribute towards well being
<p>The policy provides clarity to the development strategy for Stafford, setting out the overall aim and infrastructure requirements. Recommendations to the previous policy have been incorporated. It is considered that whilst the policy focuses on the Strategic Development Locations of growth, development within the existing built environment would still continue to take place and this policy would be used to assess applications. For that reason it would be appropriate to amend the policy criteria iii relating to townscape character.</p> <p>Whilst there is a separate policy relating to climate change and low carbon development, it is recognised in the evidence base that there are many heat users within Stafford and this presents opportunities for certain networks such as district heating - this should be recognised in the policy.</p> <p>The overall strategy aims to redevelopment brownfield land where possible and this should also be reaffirmed in the policy for Stafford.</p> <p>Where there are uncertain effects, these will be addressed through the implementation of other policies in the plan and the process of deciding individual planning applications.</p>					
<b>Environment</b>					
iii. Development is sympathetic to the landscape and townscape character					
<b>Infrastructure</b>					
<u>Low carbon development will be achieved by maximising opportunities to accommodate district heating solutions.</u>					
<u>Optimises the use of previously developed land where feasible and practical</u>					

<b>Policy Stafford 2: North of Stafford</b>		Effects over time			Comments
SA Obj	Indicators	Short	medium	long	
1	Employment rate	✓✓	✓✓	✓✓	Increased employment opportunities over short to long term
2	Employment land	✓/?	✓/?	✓/?	Although policy does not limit employment to one type it could specify a range of different employment uses
3	Vacant units	?	✓	✓	Policy aims to create a sustainable urban extension
4	Farm diversification, affordable housing	0	0	0	No impact on rural area unless businesses move from rural area to Stafford or location is currently used as important source of agricultural employment

**Policy Stafford 2: North of Stafford**

5	Developments contrary to EA	0	√	√	√	Elements of the policy will contribute towards reducing flood risk on site and elsewhere in Stafford
6	Affordable housing	√√	√√	√√	√√	The policy aims to achieve 930 affordable homes and those in line with existing and future projected need
7	Public Transport access	?	√	√	√	Facilities and services required on site
8	Crime	?	?	?	?	Depends on final design and layout
9	Noise and light impacts	?	?	?	?	Large urban extension will have light and noise impacts compared to existing use - design will play a role in mitigating such effects
10	Natural greenspace	?	√	√	√	Positive impact through increased services in close proximity, leisure and recreation facilities and high quality environment
11	Renewable Energy	?	?	?	?	Development will contribute towards climate change however impacts can be offset through low carbon development and delivery of renewable energy solutions
12	SSSI quality	√	√	√	√	Positive impact through green infrastructure provision
13	Development on PDL	x	x	x	x	Large scale urban greenfield extension
14	River Quality	0	√	√	√	Policy aims to reduce flooding. Blue corridors will contribute to improving water quality
15	Buildings at risk	√√	√	√	√	Policy aims to retain trees and hedgerows which are critical to maintaining the existing sensitive landscape character in the north of Stafford
16	Household change	0	√	√	√	Development will meet some existing and projected future needs resulting in less need to move elsewhere
17	Attitude to area	0	0	0	0	Neutral Impact
18	Compliance with SCI	0	0	0	0	Policy should include local consultation on masterplan
19	Voluntary organisations	0	0	0	0	Neutral Impact
20	Wellbeing	0	0	0	0	Policy should include local consultation on masterplan

Overall the policy aims to deliver a sustainable urban location with social, environmental and economic benefits. There are negative impacts in terms of SA objective 13 due to the development of a greenfield site. The plan aims to where possible develop brownfield land but it is recognised that this would be sufficient to meet the needs over the plan period. Suggested word changes relating to Policy Stafford 1 have been provided above which will aim to deliver brownfield land where possible.

This policy does not specify the type of employment use. Whilst specifying one type of employment use might lead to a site not being viable or limiting the potential of the site, it would be suitable for development of this size to provide a range of employment types, to assist with viability and vitality of the area. A suggested word change is below:

**Employment**

iii. At least 36 hectares of **a variety** of new employment land with comprehensive links for a range of transport

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**Policy Stafford 2: North of Stafford**

modes across the A34 to housing development areas;

**Policy Stafford 3: East of Stafford**

SA Obj	Indicators	Effects over time			Comments
		Short	medium	long	
1	Employment rate	✓	✓	✓	Delivery of employment land
2	Employment land	✓	✓	✓	Due to proximity to university policy could be specific about the type of employment land - addressed in criteria b) of the local economy policy
3	Vacant units	✓	✓	✓	Will add to existing services, residential and employment uses in this area
4	Farm diversification, affordable housing	0	0	0	Neutral Impact
5	Developments contrary to EA	✓	✓	✓	Sustainable construction, green infrastructure and flood risk addressed
6	Affordable housing	✓✓	✓✓	✓✓	Policy aims to deliver range of housing tenures and types with a requirement for 180 affordable homes
7	Public Transport access	?	✓	✓	Delivery of increased services and facilities
8	Crime	?	?	?	Uncertain impact
9	Noise and light impacts	?	?	?	Edge of settlement development
10	Natural greenspace	?	✓	✓	Positive impact through increased services in close proximity, leisure and recreation facilities and high quality environment
11	Renewable Energy	?	?	?	Development will contribute towards climate change however impacts can be offset through low carbon development and delivery of renewable energy solutions
12	SSSI quality	✓	✓	✓	Policy includes provision of GI and protection of nature sites
13	Development on PDL	x	x	x	Loss of greenfield land
14	River Quality	?	✓	✓	Flood management scheme should also address water quality and quantity
15	Buildings at risk	?	?	?	Depends on design and implementation but policy aims to protect this highly sensitive location
16	Household change	0	0	0	Neutral Impact
17	Attitude to area	0	0	0	Neutral Impact
18	Compliance with SCI	0	0	0	Policy should include local consultation on masterplan
19	Voluntary organisations	0	0	0	Neutral Impact

**Policy Stafford 3: East of Stafford**

20	Wellbeing	0	0	0	0	Policy should include local consultation on masterplan
<p>Overall the policy aims to deliver a sustainable urban location with social, environmental and economic benefits and links to the town centre. There are negative impacts in terms of Sustainability Appraisal Objective 13 and uncertain impacts in terms of light and noise impacts, contributions to climate change, landscape and crime. It is considered that the uncertain effects will be addressed by other policies in the plan and the planning application process. The policy could be improved by making specific reference to certain employment uses however this will be addressed through criteria b of the local economy policy which aims to promoting Stafford Borough as a location for new business start-ups, new enterprise and incubator units, and Information Technology capacity sectors in urban and rural areas that are in accordance with other elements of the development strategy - in particular high tech research or renewable energy, which is recognised in the evidence base and identified as sustainability issue.</p>						

**Policy Stafford 4: West of Stafford**

SA Obj	Indicators	Effects over time			Comments
		Short	medium	long	
1	Employment rate	√	√	√	Increased employment through development stage and through services and facilities and mixed use development in medium and long term
2	Employment land	0	0	0	Neutral impact on economic diversity due to size of mixed use area
3	Vacant units	√	√	√	Location accessible to and from existing centre, transport links and range of employment and service provision
4	Farm diversification, affordable housing	0	0	0	Neutral impact on rural communities
5	Developments contrary to EA	?	√	√	Policy aims to address current drainage issues at Doxey Brook
6	Affordable housing	√	√	√	The policy aims to achieve 660 affordable homes and houses in line with need
7	Public Transport access	√	√	√	Includes services, facilities and links to existing town centre. These locations are close to service centres
8	Crime	?	?	?	Depends on final design and layout
9	Noise and light impacts	?	?	?	Large urban extension will have light and noise impacts compared to existing use. Area also includes setting of the castle which is sensitive
10	Natural greenspace	?	√	√	Positive impact through increased services in close proximity, leisure and recreation facilities and high quality environment
11	Renewable Energy	?	?	?	Development will contribute towards climate change however impacts can be offset through low carbon development and delivery of renewable energy solutions
12	SSSI quality	?	√	√	Policy aims to retain existing features, provide a GI Network and consider impacts on the BAS
13	Development on PDL	x	x	x	Large scale urban greenfield extension
14	River Quality	0	√	√	Flood management scheme should also address water quality and quantity
15	Buildings at risk	?	?	?	Depends on design and implementation but policy aims to protect the setting of Stafford Castle and surrounding landscape
16	Household change	0	0	0	Neutral Impact
17	Attitude to area	0	0	0	Neutral Impact



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**Policy Stafford 4: West of Stafford**

18	Compliance with SCI	0	0	0	0	Policy should include local consultation on masterplan
19	Voluntary organisations	0	0	0	0	Neutral Impact
20	Wellbeing	0	0	0	0	Policy should include local consultation on masterplan

Overall the policy aims to deliver a sustainable urban location with social, environmental and economic benefits and links to the town centre. There are negative impacts in terms of soil due to the development of a greenfield site. Possible uncertain impacts are identified for noise and light, landscape, and contributions to climate change. The mitigation for such impacts will be delivered through the implementation of other policies in the plan and through the masterplanning/planning application relating to the site.

**Policy Stone 1: Stone Town**

SA Obj	Indicators	Effects over time			Comments
		Short	medium	long	
1	Employment rate	✓	✓	✓	Positive effect through allocating additional employment land, retail space and office space
2	Employment land	✓	✓	✓	Positive effect through allocating additional employment land, and mixed use development
3	Vacant units	✓	0	0	The right balance of development will improve viability and vitality of Stone but uncertainty over vacant units in the long term
4	Farm diversification, affordable housing	✓	✓	✓	Minor positive effect through Stone serving rural hinterland - this will depend on access to and from Stone in terms of public transport and general access
5	Developments contrary to EA	✓	✓	✓	Policy addresses flood issues
6	Affordable housing	✓	✓	✓	Positive effect through increase range and type of housing.
7	Public Transport access	✓	✓	✓	Policy aims for balance of employment, leisure, housing and retail
8	Crime	?	?	?	Depends on implementation
9	Noise and light impacts	0	?	?	Impact of strategic locations to be minimised
10	Natural greenspace	✓	✓	✓	Positive effect through meeting sport and recreation deficiencies and GI
11	Renewable Energy	✓	✓	?	Policy aims to encourage greater use of public transport which will reduce use of car but large greenfield development could contribute towards climate change
12	SSSI quality	✓	✓	✓	The policy reflects previous policy recommendations relating to biodiversity protection and enhancement
13	Development on PDL	✓	?	x	Loss of greenfield land in longer term
14	River Quality	✓	✓	✓	Policy addresses water issues identified in the evidence base
15	Buildings at risk	✓	✓	✓	Policy addresses natural, built and historic landscape
16	Household change	✓	✓	✓	The right balance of housing and employment will result in less need to move elsewhere or travel elsewhere for work
17	Attitude to area	✓	✓	✓	High quality development to improve attitude to area
18	Compliance with SCI	0	0	0	Neutral impact

**Policy Stone 1: Stone Town**

19	Voluntary organisations	0	0	0	0	Neural impact
20	Wellbeing	✓	✓	✓	✓	High quality development and provision of facilities, housing for local needs, employment and improved environment to improve attitude to area

This policy reflects the recommended changes as part of the Sustainability Appraisal Report addressing the requirement for affordable housing, SUDS, biodiversity and infrastructure improvements to Pirehill Wastewater Treatment Works. There are no further recommended changes to this policy. Uncertain impacts will be addressed through the implementation of other policies in the plan.

**Policy Stone 2: West and South of Stone**

SA Obj	Indicators	Effects over time			Comments
		Short	medium	long	
1	Employment rate	✓	✓	✓	Positive effect through increased employment development
2	Employment land	✓	✓	✓	Positive effect through increased employment development
3	Vacant units	✓	✓	✓	Viability and vitality improved through balance of housing and employment in same area
4	Farm diversification, affordable housing	?	?	?	The benefits of this policy will be mainly for Stone residents. However increased employment may meet needs of some rural areas
5	Developments contrary to EA	✓	✓	✓	Policy adequately addresses surface water flooding
6	Affordable housing	0	✓	✓	Positive effect through requiring 30% affordable housing which will address current need in Stone
7	Public Transport access	0	✓	✓	Policy aims to improve current and future access to development and services
8	Crime	?	?	?	Depends on design, layout and implementation
9	Noise and light impacts	0	?	?	Policy includes consideration of suitable design to reduce impacts
10	Natural greenspace	0	✓	✓	Positive effect through increased open space and links
11	Renewable Energy	0	?	?	Whilst development will contribute to climate change the policy advocates on site renewable energy and low carbon development
12	SSSI quality	0	✓	✓	Policy provides adequate consideration for GI, wildlife networks and impacts on local sites
13	Development on PDL	0	x	x	Negative impact through development of greenfield locations
14	River Quality	0	✓	✓	Policy adequately addresses surface water and has been strengthened to include SUDS
15	Buildings at risk	0	✓	✓	Policy has been strengthened to specify landscape considerations as this area has high historic sensitivity
16	Household change	0	✓	✓	Meeting housing and employment needs will reduce need to move or travel elsewhere for work
17	Attitude to area	0	0	0	Neutral effect



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**Policy Stone 2: West and South of Stone**

18	Compliance with SCI	0	0	0	0	Neutral effect
19	Voluntary organisations	0	0	0	0	Neutral effect
20	Wellbeing	0	0	0	0	Neutral effect

Overall the policy address issues for the areas west and south of Stone and encourages development that is well integrated into the local area with social, environmental and economic benefits. This policy reflects the recommended changes as part of the Sustainability Appraisal Report by including reference to SuDs and landscape sensitivity. There are no further recommendations for this policy.

**Policy E1: Local Economy**

SA Obj	Indicators	Effects over time			Comments
		Short	medium	long	
1	Employment rate	✓✓	✓✓	✓✓	Major positive through increased range of employment
2	Employment land	✓✓	✓✓	✓✓	Major positive through range of employment development
3	Vacant units	✓✓	✓✓	✓✓	Major positive through range of employment development
4	Farm diversification, affordable housing	✓✓	✓✓	✓✓	Major positive through proactive approach to farm diversification, live/work units and service related employment serving rural area
5	Developments contrary to EA	?	?	?	Depends on implementation of policy in conjunction with relevant environment policies
6	Affordable housing	✓	✓	✓	Limited positive effect through allowing live/work units where suitable
7	Public Transport access	✓	✓	✓	Positive effect through improved access to a range of employment opportunities across the Borough, not just limited to existing recognised industrial estates
8	Crime	?	?	?	Depends on implementation
9	Noise and light impacts	✓	✓	✓	Policy consider local environment impact and impact on residents
10	Natural greenspace	0	0	0	Policy considered local environment impact but does not consider enhancement
11	Renewable Energy	?	?	?	Depends on implementation of policy in conjunction with low carbon policy
12	SSSI quality	0	0	0	Policy considers local environment impact
13	Development on PDL	✓	✓	✓	Policy aims to reuse existing buildings and developed land where possible. In addition permitting live/work units and home working would reduce need to develop further land
14	River Quality	✓	✓	✓	The policy would not permit development where there would be environmental impacts. The outcome also depends on the implementation of policy in conjunction with environmental policies.
15	Buildings at risk	✓	✓	✓	The policy would not permit development where there would be landscape impacts. The outcome also depends on the implementation of policy in conjunction with environmental policies.
16	Household change	✓	✓	✓	Consider that the policy would allow a range of employment uses to be developed and thus reduce need to move elsewhere to meet employment needs

**Policy E1: Local Economy**

17	Attitude to area	0	0	0	0	Neutral effect
18	Compliance with SCI	0	0	0	0	Neutral effect
19	Voluntary organisations	0	0	0	0	Neutral effect
20	Wellbeing	✓	✓	✓	✓	Consider that the policy would allow a range of employment uses to be developed and thus reduce need to move elsewhere to meet employment needs

This policy aims to support a range of employment development which will reduce the need to travel elsewhere, increase competitiveness and address issues of amenity and environmental impact. Overall the policy is considered proactive in permitting development that would assist with the local economy and aiming for a range of different types of employment land, in line with the identified sustainability issues. Uncertain impacts identified relating to crime, contributions and risk to climate change will be mitigated against through the implementation of other detailed policies in the plan.

**Policy E2: Achieving Rural Sustainability**

SA Obj	Indicators	Effects over time			Comments
		Short	medium	long	
1	Employment rate	✓	✓	✓	Policy will allow for more employment opportunities in rural area
2	Employment land	✓	✓	✓	Policy will allow for more employment opportunities in rural area
3	Vacant units	✓✓	✓✓	✓✓	Policy aims to achieve vibrant rural communities
4	Farm diversification, affordable housing	✓✓	✓✓	✓✓	Aims to meet various needs of rural community
5	Developments contrary to EA	✓	✓	✓	Limited positive through criteria vi. proposals which help to conserve or improve the rural environment;
6	Affordable housing	✓	✓	✓	Limited positive depending on location
7	Public Transport access	✓	✓	✓	Development aims to allow developed in existing areas where there is a need
8	Crime	✓	✓	✓	Policy includes crime prevention measures
9	Noise and light impacts	✓	✓	✓	Development would not be allowed where there was an impact on local amenity
10	Natural greenspace	✓	✓	✓	Limited positive impact through permitted development for recreation uses
11	Renewable Energy	✓	✓	✓	Policy encourages renewable energy development
12	SSSI quality	✓	✓	✓	Positive impact through protection of and improvements to local environment
13	Development on PDL	✓	✓	✓	Policy aims to reuse previously developed land where possible
14	River Quality	✓	✓	✓	Positive impact through protection and improvements to local environment
15	Buildings at risk	✓✓	✓✓	✓✓	Policy places high protected and consideration on character of agricultural buildings and the rural setting
16	Household change	✓✓	✓✓	✓✓	Consider that the policy aims to meet local development needs which will reduce need for people to move or travel elsewhere

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<b>Policy E2: Achieving Rural Sustainability</b>				
17	Attitude to area	✓	✓	Consider that the policy will allow for development where there is a need and high quality development will assist with the attitude to the area
18	Compliance with SCI	0	0	Neutral impact
19	Voluntary organisations	0	0	Neutral impact
20	Wellbeing	✓	✓	Consider that the policy will allow for development where there is a need and high quality development will assist with wellbeing
This policy aims to address economic, social and environmental issues related to development in the rural area. There are no recommended changes to this policy.				

<b>Policy E3: Development within Recognised Industrial Estates</b>					
SA Obj	Indicators	Effects over time			Comments
		Short	medium	long	
1	Employment rate	✓	✓	✓	Policy will assist with employment levels, particularly for the rural area
2	Employment land	✓	✓	✓	Policy will allow for a variety of uses on existing industrial estates
3	Vacant units	✓	✓	✓	Policy is not so restrictive to affect the viability of employment site
4	Farm diversification, affordable housing	✓	✓	✓	Will contribute towards rural economy
5	Developments contrary to EA	?	?	?	Depends on implementation
6	Affordable housing	0	0	0	Not applicable to delivery of housing
7	Public Transport access	✓	✓	✓	Increased access to employment opportunities
8	Crime	✓	✓	✓	Positive effect through design
9	Noise and light impacts	✓	✓	✓	Policy provides adequate consideration of impacts
10	Natural greenspace	0	0	0	Not applicable to the policy
11	Renewable Energy	?	?	?	Depends on implementation however under criteria c, schemes relating to reducing contributions to climate change to benefit businesses would be allowed.
12	SSSI quality	?	?	?	Policy only refers to significant harm of surrounding environment - detailed biodiversity considerations would be dealt with under separate policy
13	Development on PDL	✓	✓	✓	Policy aims to restrict development to existing built up areas
14	River Quality	?	?	?	Development would not be permitted where it would cause significant harm of surrounding environment. The policy would allow works to be carried out in the sites which could lead to environmental improvements in some cases
15	Buildings at risk	✓	✓	✓	Policy offers protection of the landscape
16	Household change	0	0	0	Neutral effect

**Policy E3: Development within Recognised Industrial Estates**

17	Attitude to area	0	0	0	0	Neutral effect
18	Compliance with SCI	0	0	0	0	Neutral effect
19	Voluntary organisations	0	0	0	0	Neutral effect
20	Wellbeing	0	0	0	0	Neutral effect

This policy sets out what kinds of employment uses will be suitable on existing industrial areas. Overall it is considered sustainable to continue uses on these sites as they provide a source of employment to the rural without having to travel to Stafford, Stone or larger towns outside of the Borough. Previous recommended changes relating to allowing applications for facilities and works have been incorporated into the policy. The policy aims to permit those employment uses which are suitable to the location and allows for change of use to alternative employment uses which may be required towards the end of the plan period should the employment needs of the Borough continue to change. There are no further recommended changes to this policy. Uncertain impacts will be mitigated against through the implementation of other policies in the plan.

**Policy E4: Raleigh Hall & Ladfordfields Recognised Industrial Estates**

SA Obj	Indicators	Effects over time			Comments
		Short	medium	long	
1	Employment rate	✓	✓	✓	Increased opportunities at existing employment areas
2	Employment land	✓	✓	✓	Increased employment land at existing employment areas
3	Vacant units	✓	✓	✓	The recognised industrial estates are an important source of employment and industry within the Borough and allowing them to expand will contribute to future proofing the locations and maintaining competitiveness
4	Farm diversification, affordable housing	✓	✓	✓	Both locations serve the rural area
5	Developments contrary to EA	✓	✓	✓	Policy addresses flooding and drainage issues through SUDS
6	Affordable housing	0	0	0	No impact
7	Public Transport access	✓	✓	✓	There are known access issues at these locations with infrequent or no public transport opportunity. The policy aims to address this in criteria iv.
8	Crime	?	?	?	Depends on implementation in combination with design policies
9	Noise and light impacts	✓	✓	✓	Development to reduce impact on surrounding area and landscape
10	Natural greenspace	0	0	0	Do not consider this policy would have a direct impact
11	Renewable Energy	0	0	0	Consider the policy could be more proactive at encouraging low carbon, renewable development at employment sites. Particularly Raleigh Hall where there is an existing biomass plant which

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Policy E4: Raleigh Hall & Ladfordfields Recognised Industrial Estates			
			could tie into any new development via a district heating scheme.
12	SSSI quality	✓	✓
13	Development on PDL	x	x
14	River Quality	✓	✓
15	Buildings at risk	✓	✓
16	Household change	✓	✓
17	Attitude to area	0	0
18	Compliance with SCI	0	0
19	Voluntary organisations	0	0
20	Wellbeing	0	0
<p>The Plan for Stafford Borough Publication now includes a specific policy on the two employment areas which were covered in a general economy policy in the Draft Publication document. It is considered that this policy addresses issues from the previous Sustainability Appraisal Report relating to biodiversity impacts and promotion of sustainable forms of transport. It is considered that the policy could be more proactive in terms of encouraging renewable energy and low carbon opportunities where they exist. Recommended word changes are presented below:</p> <p>Policy E4</p> <p>Raleigh Hall &amp; Ladfordfields Recognised Industrial Estates</p> <p>Deliver a total of 6 hectares of new employment land at Ladfordfields Industrial Estate and 6 hectares of new employment land at Raleigh Hall Industrial Estate, identified on the Policies Map, to support economic activity through delivering the following criteria:</p> <p>i. Development is of a design and layout that reduces impacts on the surrounding area and landscape;</p> <p>ii. <b><u>Where they exist, development maximises the opportunities for low carbon networks</u></b></p> <p>iii. Measure to alleviate flooding and surface water management on the site and reduce associated implications on nearby watercourses through necessary works and Sustainable Drainage Systems (SUDS);</p> <p>iv. Protect nature conservation interests including the Site of Biological Importance;</p> <p>v. Measures to improve accessibility by non-car transport modes through walking and cycling connections;</p> <p>v. An access, transport and travel plan strategy. The strategy shall identify access points to the site and between the site and the existing settlement. It shall also identify construction access arrangements that do not disrupt existing residents and improvements to transport capacity along the A519 at Raleigh Hall and along the B5405 at Ladfordfields as well as deliver local transport network measures;</p>			



**Policy E4: Raleigh Hall & Ladfordfields Recognised Industrial Estates**

- vi. Appropriate landscaping has been delivered to reduce the impact on surrounding areas.
- vii. Avoiding the main water pipe running through the Ladfordfields site and reinforcement of the water supply required at Raleigh Hall
- viii. Provision of a local electricity sub-station
- ix. Waste water infrastructure investment
- x. Local highway improvements and enhancements
- xi. Gas reinforcement works

**Policy E5: Major Developed Sites in the Green Belt**

SA Obj	Indicators	Effects over time			Comments
		Short	medium	long	
1	Employment rate	✓	✓	✓	Limited positive
2	Employment land	✓	✓	✓	Limited positive through similar size redevelopment of Major Developed Sites
3	Vacant units	✓	✓	✓	Positive effect through permitting redevelopment to more relevant uses
4	Farm diversification, affordable housing	✓	✓	✓	Limited positive as sites located in rural area
5	Developments contrary to EA	0	0	0	Neutral assuming redevelopment is similar scale with no existing flooding issues
6	Affordable housing	0	0	0	Neutral impact - policy does not specify residential use
7	Public Transport access	✓	✓	✓	Positive effect through meeting criteria in policy SP7
8	Crime	?	?	?	Depends on implementation of other design policies
9	Noise and light impacts	0	0	0	Development to be similar scale as previous buildings
10	Natural greenspace	0	0	0	Neutral impact - do not consider policy would contribute towards improving healthy lifestyles
11	Renewable Energy	0	0	0	Neutral impact - do not consider the policy would either reduce or increase social contributions to climate change
12	SSSI quality	✓	✓	✓	Limited positive through meeting criteria in policy SP7
13	Development on PDL	✓	✓	✓	Major positive through limiting the size of redevelopment
14	River Quality	0	0	0	Neutral impact assuming no water issues on existing sites
15	Buildings at risk	✓	✓	✓	Policy provides adequate protection to the openness of the Green Belt
16	Household change	✓	✓	✓	Allows redevelopment for more appropriate modern uses resulting in less need to travel elsewhere for employment needs
17	Attitude to area	0	0	0	Neutral impact - do not consider the policy or redevelopment of sites would have an impact on attitudes

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**Policy E5: Major Developed Sites in the Green Belt**

18	Compliance with SCI	0	0	0	Neutral impact
19	Voluntary organisations	0	0	0	Neutral impact
20	Wellbeing	0	0	0	Neutral impact - do not consider the policy or redevelopment of sites would have an impact on attitudes

This policy sets out a positive approach to redeveloping Major Developed Site in the Green Belt where the reuse would not conflict with the NPPF. Overall there are no recommended changes to this policy. Uncertain effects will be mitigated against through the implementation of other policies in the plan, particularly the design policy.

**Policy E6: Tourism**

SA Obj	Indicators	Effects over time			Comments
		Short	medium	long	
1	Employment rate	✓	✓	✓	Positive impact through enhanced local tourism
2	Employment land	✓	✓	✓	Positive impact through increased competitiveness within tourism sector
3	Vacant units	✓	✓	✓	Positive impact on viability and vitality
4	Farm diversification, affordable housing	✓	✓	✓	Provides for tourism related development in rural areas, providing local opportunities for employment
5	Developments contrary to EA	0	0	0	Consider policy offers consideration of flood risk
6	Affordable housing	0	0	0	Neutral effect - not applicable to housing, only visitor accommodation
7	Public Transport access	✓	✓	✓	Policy aims to improve access to networks and improve linkages and routes which will not just be of benefit to visitors
8	Crime	?	?	?	Depends on implementation / design of tourist uses
9	Noise and light impacts	✓	✓	✓	Policy now includes reference to local amenity and sensitive design
10	Natural greenspace	✓	✓	✓	Positive effect through promotion of healthy lifestyles
11	Renewable Energy	✓	✓	✓	Policy now contains criteria relating to reducing carbon footprint and promoting sustainable tourism
12	SSSI quality	✓	✓	✓	Positive effect due to increased ecological networks and suitable protection for biodiversity
13	Development on PDL	?	?	?	Depends on the location and nature of proposals that come forward through the planning process
14	River Quality	✓	✓	✓	Policy offers suitable protection of the water environment
15	Buildings at risk	✓	✓	✓	Policy offers suitable protection for local landscape and character
16	Household change	0	0	0	Neutral effect - do not consider that the policy would alter the location of where people chose to live
17	Attitude to area	0	0	0	Neutral effect
18	Compliance with SCI	0	0	0	Neutral effect
19	Voluntary organisations	0	0	0	Neutral effect



**Policy E6: Tourism**

20	Wellbeing	0	0	0	0	Neutral effect
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This policy aims to encourage development that supports the range of local tourism on offer across the Borough. There are some amendments to the policy compared with the draft policy set out in the Draft Publication. These changes relate to the inclusion of a business case criteria, removal of specific reference to some of the known tourist and visitor attractions in the Borough and reference to the Cannock Chase SAC which is under visitor pressure. The policy now incorporates the recommendations put forward in the Sustainability Appraisal Report which related to impacts on local amenity, reducing carbon footprint and promotion of sustainable tourism. When assessing the policy against sustainability objectives there are many positive effects and no negative effects. There are no further recommendations to this policy. For the SA Objectives with an uncertain result, mitigation will be provided through the implementation of other policies in the plan.

**Policy E7: Canal Facilities and New Marinas**

SA Obj	Indicators	Effects over time			Comments
		Short	medium	long	
1	Employment rate	✓	✓	✓	Limited positive through increased opportunities to canal related employment. Depends on planning applications that come forward over the plan period.
2	Employment land	✓	✓	✓	Positive impact due to diversity in local economy
3	Vacant units	✓	✓	✓	Positive impact through increased visitors across the canal network and associated settlements in the Borough
4	Farm diversification, affordable housing	✓	✓	✓	Positive impact through increased visitors in rural area
5	Developments contrary to EA	0	0	0	Neutral effect
6	Affordable housing	0	0	0	Policy aims to limit permanent moorings to settlements within the hierarchy
7	Public Transport access	✓	✓	✓	Increased access to facilities via the canal network
8	Crime	?	?	?	Depends on implementation
9	Noise and light impacts	✓	✓	✓	Consider policy is adequately worded to offer protection from possible noise and light impacts
10	Natural greenspace	✓	✓	✓	Positive effect due to increased access to canal and its recreational benefits
11	Renewable Energy	?	?	?	Depends on implementation of other policies in the plan
12	SSSI quality	✓	✓	✓	Policy offers suitable protection for biodiversity
13	Development on PDL	✓	✓	✓	Limited positive. Policy aims to reuse existing buildings but doesn't limit canal uses to only this type of land
14	River Quality	✓	✓	✓	Policy offers suitable protection for water quality
15	Buildings at risk	✓	✓	✓	Policy offers suitable consideration of the countryside, landscape and historic environment
16	Household change	0	0	0	Neutral effect
17	Attitude to area	0	0	0	Neutral effect
18	Compliance with SCI	0	0	0	Neutral effect
19	Voluntary organisations	0	0	0	Neutral effect
20	Wellbeing	0	0	0	Neutral effect

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**Policy E7: Canal Facilities and New Marinas**

This policy allows for new canal side development, including encouraging the re-use of vacant and redundant properties. There are many uncertain effects which depend on the nature of specific planning applications but overall the policy provides suitable protection of the natural environment and allows development that will improve access for local communities and visitors. There are no recommended changes to this policy.

**Policy E8: Town, Local and Other Centres**

SA Obj	Indicators	Effects over time			Comments
		Short	medium	long	
1	Employment rate	0	✓	✓	Uses provide local employment
2	Employment land	0	✓	✓	Policy allows for a range of uses in town centres providing a range of employment opportunities and land
3	Vacant units	✓	✓	✓	Positive impact due to contributing towards vibrant and well used town centres
4	Farm diversification, affordable housing	✓	✓	✓	Policy also applies to rural centres and aims to retain local services and facilities which are vital to rural communities
5	Developments contrary to EA	0	0	0	Neutral impact - assuming town centres are not subject to flooding
6	Affordable housing	✓	✓	✓	Limited positive through increase in residential provision in town centre
7	Public Transport access	✓	✓	✓	Policy aims to protect and enhance services, facilities and retail opportunities in sustainable locations improving access to such uses. Assuming existing centres have good public transport links
8	Crime	✓	✓	✓	Positive impact due to vibrant and well used town centres and use of natural surveillance
9	Noise and light impacts	✓	✓	✓	Suitable consideration of impacts
10	Natural greenspace	✓	✓	✓	Limited positive. Policy aims to protect and enhance services, facilities and retail opportunities in sustainable locations which will encourage healthy lifestyles and reduce need to travel out of town for certain uses
11	Renewable Energy	✓	✓	✓	Limited positive through protecting and enhancing services, facilities and retail opportunities in sustainable locations and restricting out of town development reducing need to travel
12	SSSI quality	0	0	0	Neutral effect
13	Development on PDL	✓	✓	✓	Limited positive through protecting and enhancing services, facilities and retail opportunities in sustainable locations and restricting out of town development encouraging use of brownfield land
14	River Quality	0	0	0	Neutral effect
15	Buildings at risk	✓	✓	✓	Limited positive through protecting and enhancing services, facilities and retail opportunities in sustainable locations and restricting out of town development
16	Household change	✓	✓	✓	Vibrant town centres with a range of uses will reduce need to travel elsewhere to meet needs

**Policy E8: Town, Local and Other Centres**

17	Attitude to area	0	0	0	0	Neutral effect
18	Compliance with SCI	0	0	0	0	Neutral effect
19	Voluntary organisations	0	0	0	0	Neutral effect
20	Wellbeing	0	0	0	0	Neutral effect

This policy is made up of two policies set out in the Draft Publication document. These are **New retail and leisure development outside the defined town centres, Class A3, A4 & A5 Uses and Town, District & Village Centres**. This policy aims to maintain and enhance the role of town centres and discourage development that may have a negative impact, such as those which attract users away from town centres or those which result in the loss of important services in rural areas. There are many positive effects when assessed against sustainability objectives and no negative effects. Overall there are no recommended changes to this policy.

**Policy T1: Transport**

SA Obj	Indicators	Effects over time			Comments
		Short	medium	long	
1	Employment rate	0	0	0	Neutral effect - no direct link with employment rate
2	Employment land	0	0	0	Neutral effect - no delivery of employment land
3	Vacant units	✓	✓	✓	Positive impact through range of transport modes and accessibility
4	Farm diversification, affordable housing	✓	✓	✓	Positive impact through range of transport modes and accessibility
5	Developments contrary to EA	?	?	?	Uncertain impact - depends on implementation of other plan policies and site specific solutions to planning applications
6	Affordable housing	0	0	0	Neutral impact - no direct link to housing delivery
7	Public Transport access	✓	✓	✓	Positive impact from well located development
8	Crime	0	0	0	Neutral effect
9	Noise and light impacts	✓	✓	✓	Policy aims to reduce impact of traffic
10	Natural greenspace	✓	✓	✓	Positive impact through quality transport network
11	Renewable Energy	✓	✓	✓	Policy aims where possible to reduce need to travel by car and increase other modes of transport
12	SSSI quality	?	?	?	Uncertain impact
13	Development on PDL	?	?	?	Uncertain impact
14	River Quality	?	?	?	Uncertain impact
15	Buildings at risk	0	0	0	Neutral effect
16	Household change	✓	✓	✓	A good transport network will influence where people choose to live and work
17	Attitude to area	✓	✓	✓	A good transport network will influence communities attitudes to the local area
18	Compliance with SCI	0	0	0	Neutral effect
19	Voluntary organisations	0	0	0	Neutral effect - unlikely policy will influence volunteering
20	Wellbeing	✓	✓	✓	A good transport network will influence communities attitudes to the local area and improve general well being

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**Policy T1: Transport**

This policy advocates a variety of transport modes, which aim to reduce the use of the car. The policy also considers other aspects of transport such as parking which will not only assist with encouraging other modes of transport but will have positive impacts on streetscene and road safety. There are no proposed changes to make to this policy. Where uncertain impacts have been identified the implementation of other planning policies will deliver mitigation

**Policy T2: Parking and Manoeuvring Facilities**

SA Obj	Indicators	Effects over time			Comments
		Short	medium	long	
1	Employment rate	0	0	0	Neutral impact
2	Employment land	0	0	0	Neutral impact
3	Vacant units	✓	✓	✓	Positive impact through adequate parking and efficient use of land
4	Farm diversification, affordable housing	✓	✓	✓	Positive impact through adequate parking and efficient use of land in rural area
5	Developments contrary to EA	✓	✓	✓	Positive impact through adequate parking and efficient use of land - providing too much parking can have a negative effect on drainage and surface run off
6	Affordable housing	0	0	0	Neutral impact
7	Public Transport access	✓	✓	✓	Positive impact for access but only for those with car
8	Crime	?	?	?	Depends on implementation
9	Noise and light impacts	?	?	?	Depends on implementation and design of parking
10	Natural greenspace	0	0	0	Neutral impact
11	Renewable Energy	✓	✓	✓	Scope to reduce standards in areas with more opportunity for sustainable transport
12	SSSI quality	0	0	0	Neutral impact
13	Development on PDL	✓	✓	✓	Efficient use of land
14	River Quality	0	0	0	Neutral impact
15	Buildings at risk	?	?	?	Adequate parking and efficient use of land could have a positive impact on the landscape and local character but this will depend on implementation of individual schemes
16	Household change	0	0	0	Neutral impact
17	Attitude to area	✓	✓	✓	Adequate well planned parking can have a positive impact on local attitudes and well being
18	Compliance with SCI	0	0	0	Neutral impact
19	Voluntary organisations	0	0	0	Neutral impact
20	Wellbeing	✓	✓	✓	Adequate well planned parking can have a positive impact on local attitudes and well being

There is one difference to this policy and the draft policy set out in the Draft Publication report. This change is the omission of reference to using planning obligations to provide parking elsewhere. The policy still aims to provide sufficient parking across the Borough, with opportunities for encouraging efficient use of land in locations where sustainable modes are more appropriate. There are no recommended changes to the policy.

SA Obj		Effects over time			Comments
		Short	medium	long	
1	Indicators Employment rate	0	0	0	Limited positive through construction industry creating jobs but this is dependent on development sector and planning applications and could vary over the plan period
2	Employment land	0	0	0	Policy alone will not create range of employment types
3	Vacant units	✓	✓	✓	Housing which matches local demand/need will increase viability and vitality of areas
4	Farm diversification, affordable housing	✓	✓	✓	Housing which matches local demand and need will increase viability and vitality of rural areas. Currently there is an issue in many rural areas where younger members of the community cannot access suitable housing and so move out of the area
5	Developments contrary to EA	0	0	0	Neutral effect
6	Affordable housing	✓✓	✓✓	✓✓	Positive effect through an increased range of housing across the Borough. The policy could be improved by re-incorporating consideration of lifetime standards
7	Public Transport access	0	0	0	Neutral effect
8	Crime	?	?	?	Depends on implementation
9	Noise and light impacts	✓	✓	✓	Positive effect through compatible development to the area
10	Natural greenspace	✓	✓	✓	Well being improved through appropriate housing for local communities over short to long term
11	Renewable Energy	?	?	?	Policy alone will not reduce contributions to climate change but providing dwellings that are needed will make better use of resources and could free up existing dwellings
12	SSSI quality	0	0	0	Neutral effect
13	Development on PDL	?	?	?	Depends on specific location of housing and implementation of the development strategy
14	River Quality	?	?	?	Uncertain effect
15	Buildings at risk	✓	✓	✓	Positive effect through compatible development suitable for that location
16	Household change	0	✓	✓	Will provide the homes that are needed in the area based on locality information and current waiting list
17	Attitude to area	✓	✓	✓	Positive effect through delivery of housing according to need and allowing more people to stay in their communities rather than moving elsewhere to access accommodation
18	Compliance with SCI	0	0	0	Neutral effect
19	Voluntary organisations	0	0	0	Neutral effect

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<b>Policy C1: Dwelling Types and Sizes</b>	
20	Wellbeing Positive effect through delivery of housing according to need and allowing more people to stay in their communities rather than moving elsewhere to access accommodation
<p>The policy no longer refers to density and lifetime home standards when compared to the policy set out in the Draft Publication. It is considered that density is dealt with in other parts of the plan, mainly in the Design policy. Whilst the plan refers to lifetime home standards this is not in any policy wording. As lifetime homes are not specifically covered by building regulations, it is considered the plan could be improved by incorporating consideration of such standards in the policy itself. Recommended amendments to the policy are provided below. Overall the policy aims to address current shortages in certain types of dwellings. There are many positive effects when appraised against sustainability objectives and no negative effects.</p>	
<b>Policy C1</b>	
Dwelling Types and Sizes	
<p>New housing development must provide an appropriate mix of dwelling types, tenures and sizes, including a proportion of affordable housing (Policy C2), <b>lifetime home standards</b>, and, where possible, specialist provision to respond to the identified needs of the community. To secure the appropriate range of dwelling types, the Council will seek that:</p>	

SA Obj	Indicators	Effects over time			Comments
		Short	medium	long	
1	Employment rate	0	0	0	Neutral effect
2	Employment land	0	0	0	Neutral effect
3	Vacant units	✓	✓	✓	Will allow more people to stay in Borough assisting viability and vitality of settlements
4	Farm diversification, affordable housing	✓	✓	✓	Will allow more people to remain in rural areas
5	Developments contrary to EA	?	?	?	Uncertain effect
6	Affordable housing	✓✓	✓✓	✓✓	Major positive through the aim to deliver affordable housing.
7	Public Transport access	?	?	?	Uncertain effect
8	Crime	?	?	?	Uncertain effect
9	Noise and light impacts	?	?	?	Uncertain effect
10	Natural greenspace	?	?	?	Uncertain effect
11	Renewable Energy	?	?	?	Uncertain effect
12	SSSI quality	?	?	?	Uncertain effect
13	Development on PDL	?	?	?	Uncertain effect
14	River Quality	?	?	?	Uncertain effect
15	Buildings at risk	✓	✓	✓	Positive impact in terms of site design and layout consideration
16	Household change	✓	✓	✓	Positive effect through meeting housing needs within the Borough
17	Attitude to area	0	0	0	Neutral effect



<b>Policy C2: Affordable Housing</b>					
18	Compliance with SCI	0	0	0	Neutral effect
19	Voluntary organisations	0	0	0	Neutral effect - do not consider that the policy will contribute towards volunteering
20	Wellbeing	√	√	√	Positive effect through meeting specific housing needs within the Borough
<p>The Strategic Policy Choices Sustainability Appraisal concluded that the most sustainable option regarding affordable housing would be a blanket 30% affordable housing policy approach across all developments except in areas where it is known that the viability study shows that a higher level could be achieved. This recommendation has been incorporated into the policy.</p> <p>As reported in the baseline data the amount of affordable housing that has been completed has varied over the last few years. Delivery of affordable housing is also identified as a key sustainability issue for The Plan. This policy aims to encourage affordable housing whilst also taking into account viability. It is unlikely that the policy will meet the needs identified in the strategic housing market area assessment which is 210 and so it is important that monitoring of delivery is continued once the policy is adopted and if necessary reviewed to address delivery. There are no recommended changes to this policy.</p>					

<b>Policy C3: Specialist Housing</b>					
SA Obj	Indicators	Effects over time			Comments
		Short	medium	long	
1	Employment rate	√	√	√	Minor positive through provision of such uses and associated care element
2	Employment land	0	0	0	Neutral effect - such uses not considered employment land in the planning system
3	Vacant units	?	?	?	Uncertain effect
4	Farm diversification, affordable housing	?	?	?	Uncertain effect - depends on the location of planning applications for specialist housing
5	Developments contrary to EA	?	?	?	Uncertain effect - depends on implementation of development strategy
6	Affordable housing	√	√	√	Major positive due to meeting range of housing needs
7	Public Transport access	√	√	√	Positive effect due to location of development
8	Crime	?	?	?	Uncertain effect
9	Noise and light impacts	√	√	√	Policy provides adequate protection in terms of noise and light impacts
10	Natural greenspace	0	0	0	Whilst specialist care will provide an element of care which will assist with healthy lifestyles, this will be considered through the management of the site
11	Renewable Energy	?	?	?	Uncertain effect
12	SSSI quality	?	?	?	Uncertain effect
13	Development on PDL	√	√	√	Positive effect through efficient use of land
14	River Quality	?	?	?	Uncertain effect
15	Buildings at risk	√	√	√	Policy provides adequate protection for surrounding area
16	Household change	√	√	√	Will allow people to remaining living in locality
17	Attitude to area	0	0	0	Neutral effect



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**Policy C3: Specialist Housing**

18	Compliance with SCI	0	0	0	0	Neutral effect
19	Voluntary organisations	0	0	0	0	Neutral effect
20	Wellbeing	0	0	0	0	Neutral effect

As reported in the baseline data there is a growing need for specialist housing provision. This policy supports such development and advocates working with partners to deliver housing to meet the need which is 1,331 extra care units up until 2030. There are no recommended changes to this policy however monitoring of applications over the plan period is recommended and where there is no delivery a revision to the policy will be necessary.

**Policy C4: Housing Conversions and Subdivisions**

SA Obj	Indicators	Effects over time			Comments
		Short	medium	long	
1	Employment rate	0	0	0	Neutral impact
2	Employment land	0	0	0	Neutral impact
3	Vacant units	✓	✓	✓	Positive impact through efficient use of land
4	Farm diversification, affordable housing	✓	✓	✓	Policy applies to both urban and rural areas
5	Developments contrary to EA	✓	✓	✓	Positive impact assuming existing areas do not flood
6	Affordable housing	✓	✓	✓	Positive impact through housing development
7	Public Transport access	✓	✓	✓	Positive impact through development in existing built area
8	Crime	?	?	?	Uncertain impact
9	Noise and light impacts	✓	✓	✓	Policy adequately addresses noise and light impacts
10	Natural greenspace	0	0	0	Neutral impact
11	Renewable Energy	✓	✓	✓	Reduces need for new development elsewhere
12	SSSI quality	?	?	?	Uncertain impact
13	Development on PDL	✓	✓	✓	Major positive effect through efficient use of land
14	River Quality	?	?	?	Uncertain impact
15	Buildings at risk	✓	✓	✓	Positive impact through efficient use of land and reduces need to build elsewhere
16	Household change	0	0	0	Neutral impact
17	Attitude to area	0	0	0	Neutral impact
18	Compliance with SCI	0	0	0	Neutral impact
19	Voluntary organisations	0	0	0	Neutral impact
20	Wellbeing	0	0	0	Neutral impact

There are several minor word changes to this policy when compared with the version set out in the Draft Publication. These relate to fire risk and escape and specific reference to noise and light impacts. It is not considered these changes impact the overall appraisal of the policy which concludes that the policy will result in the efficient use of land and that the policy is sufficiently worded to address amenity issues which are often associated with this type of development. There are no recommended changes to this policy.

**Policy C5: Residential Proposals outside the Settlement Hierarchy**

SA Obj	Indicators	Effects over time			Comments
		Short	medium	long	
1	Employment rate	0	0	0	Neutral impact
2	Employment land	0	0	0	Neutral impact
3	Vacant units	✓	✓	✓	Meeting local needs will assist with maintaining vibrancy of rural area and viability of rural businesses, facilities and services
4	Farm diversification, affordable housing	✓	✓	✓	Meeting local needs will assist with maintaining vibrancy of rural area and viability of rural businesses, facilities and services
5	Developments contrary to EA	✓	✓	✓	Positive effect through reference to Policy SP7
6	Affordable housing	✓✓	✓✓	✓✓	Major positive through addressing local needs and affordable housing
7	Public Transport access	✓	✓	✓	Policy aims to deliver housing in those areas set out in the hierarchy which have good access to services and facilities
8	Crime	?	?	?	Uncertain - depends on implementation of other policies
9	Noise and light impacts	✓	✓	✓	Consider policy as worded offers suitable consideration of impacts
10	Natural greenspace	0	0	0	Neutral impact
11	Renewable Energy	✓	✓	✓	Limited positive through replacement dwellings reusing materials and being more energy efficient
12	SSSI quality	✓	✓	✓	Positive effect through protection of biodiversity
13	Development on PDL	✓	✓	✓	Positive effect through reuse of buildings, replacing buildings with similar size and cross reference to SP7 which aims to use brownfield land first
14	River Quality	✓	✓	✓	Positive effect through environmental considerations
15	Buildings at risk	✓	✓	✓	Positive effect through protection of local rural character
16	Household change	✓	✓	✓	Positive effect through meeting local rural housing needs
17	Attitude to area	0	0	0	Neutral impact
18	Compliance with SCI	0	0	0	Neutral impact
19	Voluntary organisations	0	0	0	Neutral impact
20	Wellbeing	✓	✓	✓	Positive effect through maintaining vibrancy of rural area

This detailed policy sets out the circumstances in which new development in the countryside would be permitted. It combines elements of policies: **Replacement Dwellings** and **New Development in the Countryside** from the Draft Publication document. It is considered through the appraisal process that the policy is balanced to allow for residential development which meets local need whilst also offering suitable protection for the character of local rural areas and the countryside. The policy addresses previous recommendations put forward in the SA Report relating to recycling material, energy efficiency and biodiversity, which is considered through the cross-reference

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**Policy C5: Residential Proposals outside the Settlement Hierarchy**

to policy SP7. There are no recommendation changes to this policy. As previously mentioned under the appraisal of the general development strategy, it is important that such developments are monitored to ensure the strategy is being delivered as anticipated and there isn't an over delivery of housing in the open countryside. See the monitoring framework for proposals for this and where a review would be necessary.

**Policy C6: Provision for Gypsies, Travellers & Travelling Show-people**

SA Obj	Indicators	Effects over time			Comments
		Short	medium	long	
1	Employment rate	✓	✓	✓	Limited minor positive effect through consideration of employment activities on sites and providing suitable accommodation for seasonal workers
2	Employment land	0	0	0	Neutral impact
3	Vacant units	0	0	0	Neutral impact
4	Farm diversification, affordable housing	0	0	0	Neutral impact
5	Developments contrary to EA	✓	✓	✓	Positive effect through suitable location of sites
6	Affordable housing	✓	✓	✓	Positive effect for meeting needs of gypsies, travellers and travelling show-people
7	Public Transport access	?	?	?	Policy no longer refers to access to services and facilities
8	Crime	?	?	?	Depends on site specific implementation
9	Noise and light impacts	?	?	?	Depends on site specific implementation
10	Natural greenspace	✓	✓	✓	Policy includes consideration of space for leisure and recreation
11	Renewable Energy	✓	✓	✓	Limited positive impact through providing on site services and recycling facilities
12	SSSI quality	✓	✓	✓	Positive impact through protection of surrounding landscape, environment and biodiversity
13	Development on PDL	?	?	?	Site does not refer to previously developed land
14	River Quality	✓	✓	✓	Policy considers water quality
15	Buildings at risk	✓	✓	✓	Positive impact through protection of surrounding landscape, environment, heritage assets and biodiversity
16	Household change	0	0	0	Neutral impact
17	Attitude to area	0	0	0	Neutral impact
18	Compliance with SCI	0	0	0	Neutral impact
19	Voluntary organisations	0	0	0	Neutral impact
20	Wellbeing	0	0	0	Neutral impact

This policy aims to allow quality pitches for gypsies, travellers and travelling show-people which address possible issues and conflicts that can arise with such development. The policy places emphasis on sites coming forward and so monitoring of planning applications will be important. Should the GTAA identified need not be met, a policy review or council led approach to site provision may be required. There are some differences between the policy and the previous version as set out in the Draft Publication,

**Policy C6: Provision for Gypsies, Travellers & Travelling Show-people**

which are the omission of references to urban sprawl and flood risk. These factors would still be considered as part of applications as they are covered in the NPPF. Other uncertain effects will be addressed through the implementation of other planning policies. Overall there are no recommended changes to this policy.

**Policy C7: Open Space, Sport and Recreation**

SA Obj	Indicators	Effects over time			Comments
		Short	medium	long	
1	Employment rate	0	0	0	Neutral impact
2	Employment land	0	0	0	Neutral impact
3	Vacant units	✓	✓	✓	Positive impact due to policy contributing to a quality environment across the Borough
4	Farm diversification, affordable housing	✓	✓	✓	Positive impact due to policy contributing to a quality environment in the rural area
5	Developments contrary to EA	✓	✓	✓	Positive impact through retention of open spaces which have multiple benefits in terms of climate change impacts
6	Affordable housing	0	0	0	Neutral impact
7	Public Transport access	✓	✓	✓	Improved access to sport and recreation
8	Crime	✓	✓	✓	If open spaces are of high quality, well used and suitable to the need rather than unfit for purpose there will be less likelihood of anti social behaviour sometimes associated with some uses
9	Noise and light impacts	0	0	0	Neutral impact
10	Natural greenspace	✓✓	✓✓	✓✓	Improved health through increased range in sport, recreation and open space
11	Renewable Energy	0	0	0	Neutral impact
12	SSSI quality	✓	✓	✓	Some uses will have biodiversity benefit or provide a suitable network between ecological sites
13	Development on PDL	0	0	0	Neutral impact
14	River Quality	0	0	0	Neutral impact
15	Buildings at risk	✓	✓	✓	Protection, enhancement or replacement of open space can add to the character of streetscene
16	Household change	✓	✓	✓	Access to sport, recreation and open space in line with need will assist with retaining households within the Borough
17	Attitude to area	✓	✓	✓	Provision and protection of high quality spaces will have an impact on attitudes to the local area. This will also depend on the longer term management of such sites and so it is important that any Borough Council Strategy is referred to in the planning application process.
18	Compliance with SCI	0	0	0	Neutral impact
19	Voluntary organisations	0	0	0	Neutral impact

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**Policy C7: Open Space, Sport and Recreation**

20	Wellbeing	✓	✓	✓	✓	Provision and protection of high quality spaces will have an impact on attitudes and well being
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This policy differs from the previous draft policy in that it does not list the sport and recreation deficiencies identified in the evidence base. It is recognised that the evidence base report is a few years old and so these deficiencies might change over time. It is considered suitable that reference is made to the assessment and any future revisions which will allow development to address most up to date deficiencies rather than those set out in an adopted policy. The policy aims to address known deficiencies at any given time as well as enhancing sport, open space and recreation in general across the plan period. There are many social, economic and environmental positive effects with no recommended changes. It is important that any future open space strategies are referenced and used as part of the planning application process.

**Policy N1: Design**

SA Obj	Indicators	Effects over time			Comments
		Short	medium	long	
1	Employment rate	0	0	0	Neutral impact
2	Employment land	0	0	0	Neutral impact
3	Vacant units	✓	✓	✓	Will contribute to a quality built environment
4	Farm diversification, affordable housing	✓	✓	✓	Must have regard to Parish plans and village design statements
5	Developments contrary to EA	0	0	0	Neutral impact - depends on implementation of policy N2
6	Affordable housing	0	0	0	Neutral impact
7	Public Transport access	✓	✓	✓	Must have regard to Parish plans and village design statements
8	Crime	✓	✓	✓	Positive impact through creating a safe environment
9	Noise and light impacts	✓	✓	✓	Positive impact through consideration of noise and light impacts
10	Natural greenspace	✓	✓	✓	Positive impact through access to open space and quality built environment
11	Renewable Energy	✓	✓	✓	Policy references sustainable construction and access by a range of transport modes helping reduce contributions to climate change
12	SSSI quality	✓	✓	✓	Positive impact through retention and creation of biodiversity areas
13	Development on PDL	✓	✓	✓	Quality design will encourage efficient use of space
14	River Quality	0	0	0	Neutral impact
15	Buildings at risk	✓✓	✓✓	✓✓	Policy encourages quality development taking into account local context
16	Household change	✓	✓	✓	High quality design will influence housing choice and location
17	Attitude to area	0	0	0	Neutral impact
18	Compliance with SCI	0	0	0	Neutral impact
19	Voluntary organisations	0	0	0	Neutral impact
20	Wellbeing	0	0	0	Neutral impact

**Policy N1: Design**

There has been restructuring and slight amendments to this design policy compared to the previous version set out in the Draft Publication. Overall the policy is considered to have many positive effects when assessed against sustainability objectives through encouraging a quality built environment. There are no recommended changes to this policy. It will be important that this policy is applied alongside policy N2 as they are mutually exclusive - design of a building can reduce the use of resources.

**Policy N2: Climate Change**

SA Obj	Indicators	Effects over time			Comments
		Short	medium	long	
1	Employment rate	?	?	?	Depends on implementation
2	Employment land	?	?	?	Depends on implementation
3	Vacant units	?	✓	✓	Will have positive impact on long term
4	Farm diversification, affordable housing	0	✓	✓	Will reduce bills and increase energy efficiency in longer term. This will be particular relevant for some rural areas where there is more limited access to grid connections such as gas
5	Developments contrary to EA	✓✓	✓✓	✓✓	Positive impact through aiming to reduce flood risk and run-off
6	Affordable housing	0	0	0	Neutral impact on delivery although will result in more efficient dwellings which will be cheaper to run
7	Public Transport access	0	0	0	Minimal impact on access
8	Crime	0	0	0	Neutral impact
9	Noise and light impacts	0	0	0	Policy will not lead to noise and light impact
10	Natural greenspace	✓	✓	✓	Positive impact due to enhanced open space and green links as part of SUDS
11	Renewable Energy	✓✓	✓✓	✓✓	Positive impact as policy will reduce contributions to climate change and reduce resource use
12	SSSI quality	✓	✓	✓	Positive impact due to enhanced green links as part of SUDS
13	Development on PDL	0	0	0	Policy will not alone lead to impact on soil quality and quantity
14	River Quality	✓✓	✓✓	✓✓	Positive impact through SUDS
15	Buildings at risk	✓	✓	✓	Consider the policy will have a positive impact on the built environment. The policy now includes consideration of traditional buildings
16	Household change	✓	✓	✓	Positive impact through quality environment
17	Attitude to area	0	0	0	Neutral impact
18	Compliance with SCI	0	0	0	Neutral impact
19	Voluntary organisations	0	0	0	Neutral impact
20	Wellbeing	✓	✓	✓	Positive impact through quality environment

There are some differences between this policy and the policy in the draft publication. These differences include reference to traditional buildings, removal of reference to contaminated land and removal of wording in the policy that would seek developments to address the causes of climate change. Overall it is not considered these changes alter the aim of the policy which is to reduce the impact of new development through improving energy efficiency, reducing reliance on natural resources and



i Appraisal of development strategy and policies

**Policy N2: Climate Change**  
encouraging sustainable drainage and recycling. In addition, the removal of some of the wording would be mitigated against through the implementation of the NPPF and building regulations.

SA Obj	Indicators	Effects over time			Comments
		Short	medium	long	
1	Employment rate	?	?	?	Uncertain impact
2	Employment land	?/N	?/N	?/N	Policy may encourage growth in green technology and green jobs
3	Vacant units	?/N	?/N	?/N	Development can support facilities, attract investors but could lead to impacts on landscape
4	Farm diversification, affordable housing	?/N	?/N	?/N	Depends on location of applications but renewable energy could assist with viability of rural businesses
5	Developments contrary to EA	?	?	?	Uncertain impact
6	Affordable housing	0	0	0	Neutral effect
7	Public Transport access	0	0	0	Neutral effect
8	Crime	0	0	0	Neutral effect
9	Noise and light impacts	0	0	0	The policy includes noise and light impacts
10	Natural greenspace	0	0	0	Neutral effect
11	Renewable Energy	✓	✓✓	✓✓	Major positive through reducing demand and use of energy from non renewable sources
12	SSSI quality	0	0	0	Depends on implementation although policy would not allow developments with detrimental impact on designated sites
13	Development on PDL	?	?	?	Depending on type of energy there may be large land take
14	River Quality	?	?	?	Uncertain impact
15	Buildings at risk	0	0	0	Depends on implementation although policy would not allow developments with significant landscape and townscape impacts to be permitted
16	Household change	0	0	0	Neutral effect
17	Attitude to area	0	0	0	Neutral effect
18	Compliance with SCI	0	0	0	Neutral effect
19	Voluntary organisations	0	0	0	Neutral effect
20	Wellbeing	0	0	0	Neutral effect

The Staffordshire Renewable Energy and Low Carbon evidence base states that there is opportunity within the Borough for renewable energy development which can contribute towards national renewable energy targets. The policy adequately includes impacts from all types of renewable energy development, however many of the impacts cannot be determined until a detailed planning application or strategic landscape impact assessment is produced. There are no recommended changes to this policy although discussion on cumulative impacts is provided in section 6.

<b>Policy N4: The Natural Environment &amp; Green Infrastructure</b>			
SA Obj	Indicators	Effects over time	Comments

## Policy N4: The Natural Environment &amp; Green Infrastructure

	Short	medium	long	
1	√/?	√/?	√/?	Depends on implementation in line with local strategy and projects
2	0	0	0	Neutral impact
3	√	√	√	GI can enhance towns and villages
4	√	√	√	GI can enhance towns and villages
5	√	√	√	GI can reduce impact of climate change through reduced flood risk/urban cooling
6	0	0	0	Neutral impact
7	√	√	√	May improve physical access to services
8	?	?	?	Depends on design
9	√	√	√	GI can help reduce noise and light impacts
10	√	√	√	GI can help improve health and well-being
11	√√	√√	√√	GI can reduce the impacts of climate change
12	√√	√√	√√	Positive impact through enhanced opportunities for habitats
13	√	√	√	Improved soil quality through the management of land
14	√√	√√	√√	Positive impact through enhanced green and blue networks
15	√√	√√	√√	Positive impact through contributions to landscape quality
16	√	√	√	Quality local environment and links can influence a persons choice of residence
17	0	0	0	Neutral impact
18	0	0	0	Neutral impact
19	0	0	0	Neutral impact
20	√	√	√	Quality environment, particularly throughout and around towns and villages which can be used for a range of purposes will improve local well being

i Appraisal of development strategy and policies

**Policy N4: The Natural Environment & Green Infrastructure**

There are some differences between this policy and that set out in the Draft Publication, with these relating to the criteria on local landscape and heritage features, inclusion of reference of the Water Framework Directive and the final criteria relating to the ecological record rather than green infrastructure standards. Overall this does not alter the outcomes of the appraisal as it is still considered there would be many social and environmental benefits to creating and enhancing the existing green infrastructure network, which will have many social and environmental benefits. The use of standards such as ANGST will be useful in monitoring this policy.

**Policy N5: Sites of European, National & Local Nature Conservation Importance**

SA Obj	Indicators	Effects over time			Comments
		Short	medium	long	
1	Employment rate	0	0	0	Neutral impact
2	Employment land	0	0	0	Neutral impact
3	Vacant units	✓	✓	✓	Consider a quality natural environment has many social and economic positive effects
4	Farm diversification, affordable housing	✓	✓	✓	Consider a quality natural environment has many social and economic positive effects for the rural area
5	Developments contrary to EA	✓	✓	✓	Protecting network of sites should help reduce impact of climate change
6	Affordable housing	0	0	0	Neutral impact
7	Public Transport access	?	?	?	Depends on implementation but enhancement could lead to increased access to nature sites
8	Crime	0	0	0	Neutral impact
9	Noise and light impacts	✓	✓	✓	Protection of natural environment would have multiple benefits including reducing noise and light impacts
10	Natural greenspace	✓	✓	✓	Could lead to increased health benefits and greater well being
11	Renewable Energy	✓	✓	✓	Positive impact through natural environment acting as a source of carbon capture
12	SSSI quality	✓✓	✓✓	✓✓	Major positive through protection and enhancement of variety of sites
13	Development on PDL	✓	✓	✓	Includes geological sites. In addition many nature sites assist with natural ecosystems assisting with ground conditions
14	River Quality	✓✓	✓✓	✓✓	Includes all watercourses and makes reference to locally specific issues set out in the SWMP and WCS
15	Buildings at risk	✓✓	✓✓	✓✓	Offers protection to a range of designated sites
16	Household change	✓	✓	✓	High quality local and surrounding environment a factor in where people decide to live
17	Attitude to area	0	0	0	Neutral impact
18	Compliance with SCI	0	0	0	Neutral impact

**Policy N5: Sites of European, National & Local Nature Conservation Importance**

19	Voluntary organisations	√/?	√/?	√/?	√/?	Nature sites offer many opportunities for volunteering locally - depends on implementation
20	Wellbeing	0	0	0	0	Neutral impact

This policy is made up of two separate draft policies contained in the draft publication document - **Development management Policy 3 and 5**. There are some changes including consideration of cumulative effects for SSSI's and setting out that development will not be permitted that would directly or indirectly damage existing mature or ancient woodland, veteran trees or ancient or species-rich hedgerows. This affords elements of the natural environment greater protection than in previous policies. The appraisal has a similar result but it is noted that there would be greater environmental benefits as a result of this policy amendment. In addition addressing the potential locally distinct effects on European sites will have many multiple environmental benefits and having it in a policy will allow for applications to be addressed from the outset, without causing delay to the planning process. The success of the benefits will depend on the implementation of the any mitigation measures. There are no recommended changes to this policy.

**Policy N6: Cannock Chase Special Area of Conservation (SAC)**

SA Obj	Indicators	Effects over time			Comments
		Short	medium	long	
1	Employment rate	0	0	0	Neutral impact
2	Employment land	0	0	0	Neutral impact
3	Vacant units	√/?	√/?	√/?	If mitigation measures are required these could contribute towards a quality environment
4	Farm diversification, affordable housing	0	0	0	Neutral impact
5	Developments contrary to EA	0	0	0	Neutral impact
6	Affordable housing	0	0	0	Neutral impact
7	Public Transport access	?	?	?	Depends on mitigation measures required such as provision of alternative sites for recreation and linkages between them
8	Crime	0	0	0	Neutral impact
9	Noise and light impacts	√/?	√/?	√/?	The policy will not lead to an increase in noise and light impacts within 400 metres of Cannock Chase SAC
10	Natural greenspace	√/?	√/?	√/?	Depends on mitigation measures required such as provision of alternative sites for recreation and linkages between them
11	Renewable Energy	√/?	√/?	√/?	Depends on mitigation measures required such as provision of alternative sites for recreation and linkages between them
12	SSSI quality	√	√	√	Purpose of the policy is to protect Cannock Chase SAC and the habitats that support its European designation.
13	Development on PDL	0	0	0	Policy alone will not result in greenfield land being used for development but management of sites could improve soil quality
14	River Quality	0	0	0	Neutral impact

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**Policy N6: Cannock Chase Special Area of Conservation (SAC)**

15	Buildings at risk	√√	√√	√√	√√	Positive impact through protecting Cannock Chase SAC and opportunities to mitigate through management and provision of alternative sites which benefit landscape
16	Household change	?	?	?	?	Education & awareness raising as part of mitigation measures may encourage community activities
17	Attitude to area	0	0	0	0	Neutral impact
18	Compliance with SCI	0	0	0	0	Neutral impact
19	Voluntary organisations	?	?	?	?	Education & awareness raising as part of mitigation measures may encourage community activities
20	Wellbeing	0	0	0	0	Neutral impact

Whilst the requirement to meet the habitat regulations would exist without this policy it is valuable as part of the new local plan in that it focuses on different types of possible effects in relation to Cannock Chase SAC and should assist with the decision making process. Addressing these locally distinct effects will have many multiple social and environmental benefits. It is noted that the work is still ongoing in relation to the Cannock Chase SAC in terms of the Habitat Regulations Assessment and the Visitor Impact Mitigation Implementation Plan and it is recommended that should this present a different outcome in terms of the distances highlighted in the wording that the policy is amended accordingly. Monitoring of this policy is important in meeting the HRA.

**Policy N7: Cannock Chase AONB**

SA Obj	Indicators	Effects over time			Comments
		Short	medium	long	
1	Employment rate	√	√	√	Positive impact through new development
2	Employment land	√	√	√	Positive impact through small new developments
3	Vacant units	√	√	√	Positive impact. Policy ensures suitable development
4	Farm diversification, affordable housing	√	√	√	AONB close to many rural settlements
5	Developments contrary to EA	0	0	0	Neutral impact
6	Affordable housing	?	?	?	Policy aims to allow development that meets local need but depends on applications that come forward
7	Public Transport access	√	√	√	Positive impact through promoting sustainable access
8	Crime	?	?	?	Depends on implementation
9	Noise and light impacts	√	√	√	Aims to support management plan principles which includes tranquillity principles
10	Natural greenspace	√	√	√	AONB is important to local communities through regular use and associated health benefits
11	Renewable Energy	√	√	√	Positive impact through encouraging other modes of transport
12	SSSI quality	√	√	√	Positive impact through protecting landscape features which support biodiversity
13	Development on PDL	√	√	√	Positive impact through protecting landscape features
14	River Quality	√	√	√	Positive impact through protecting landscape features
15	Buildings at risk	√√	√√	√√	Positive impact through protecting landscape features of the AONB which is also a country park, contains a SSSI and SAC

**Policy N7: Cannock Chase AONB**

16	Household change	✓	✓	✓	✓	Supports AONB Management Plan which includes local community activities
17	Attitude to area	0	0	0	0	Neutral effect
18	Compliance with SCI	0	0	0	0	Neutral effect
19	Voluntary organisations	✓	✓	✓	✓	Supports AONB Management Plan which includes local community and volunteer activities
20	Wellbeing	0	0	0	0	Neutral effect

This policy will allow for appropriate development in and around the AONB which will support the local community and economy and support the AONB Management Plan. There are no recommendation changes to this policy

**Policy N8: Landscape Character**

SA Obj	Indicators	Effects over time			Comments
		Short	medium	long	
1	Employment rate	0	0	0	Neutral effect
2	Employment land	0	0	0	Neutral effect
3	Vacant units	0	✓	✓	Positive impact. Considered that high quality development will improve viability & vitality
4	Farm diversification, affordable housing	✓	✓	✓	Positive effect through protecting landscape character of rural area
5	Developments contrary to EA	0	✓	✓	Development which respects the landscape should reduce the impact of climate change
6	Affordable housing	0	0	0	Neutral effect
7	Public Transport access	0	0	0	Neutral effect
8	Crime	0	0	0	Neutral effect
9	Noise and light impacts	0	✓	✓	Positive impact. Policy to reduce noise and light impacts through sympathetic design
10	Natural greenspace	0	✓	✓	Positive impact. Well being maintained through sympathetic development
11	Renewable Energy	0	0	0	Neutral effect
12	SSSI quality	✓	✓	✓	Protecting woodland, streams, hedgerows, trees and boundaries will help protect biodiversity
13	Development on PDL	✓	✓	✓	Positive impact through protecting landscape pattern
14	River Quality	✓	✓	✓	Positive impact through protecting landscape pattern and water features
15	Buildings at risk	✓	✓	✓	Policy aims to protect landscape character and quality.
16	Household change	0	0	0	Neutral effect
17	Attitude to area	0	0	0	Neutral effect
18	Compliance with SCI	0	0	0	Neutral effect
19	Voluntary organisations	0	0	0	Neutral effect
20	Wellbeing	0	0	0	Neutral effect



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**Policy N8: Landscape Character**

This policy aims to protect and enhance existing landscape character. A number of positive effects have been recognised with no negative effects being identified. There are no recommended changes to this policy.

**Policy N9: Historic Environment**

SA Obj	Indicators	Effects over time			Comments
		Short	medium	long	
1	Employment rate	0	0	0	Neutral impact
2	Employment land	0	0	0	Neutral impact
3	Vacant units	✓	✓	✓	Positive impact through quality built environment
4	Farm diversification, affordable housing	✓	✓	✓	Positive impact through maintaining character of rural area
5	Developments contrary to EA	0	0	0	Neutral impact
6	Affordable housing	0	0	0	Neutral impact
7	Public Transport access	0	0	0	Neutral impact
8	Crime	?	?	?	Uncertain/depends on implementation
9	Noise and light impacts	✓	✓	✓	Quality development to reduce noise and light impacts
10	Natural greenspace	✓	✓	✓	Minor positive - local well being maintained due to protection of historic environment
11	Renewable Energy	0	0	0	Neutral impact
12	SSSI quality	0	0	0	Neutral impact
13	Development on PDL	✓	✓	✓	Positive impact through sensitive development in historic environment rather than greenfield development
14	River Quality	0	0	0	Neutral impact
15	Buildings at risk	✓✓	✓✓	✓✓	Policy will have major positive effect on protection and enhancement of historic environment
16	Household change	0	0	0	Neutral impact
17	Attitude to area	✓	✓	✓	Improved attitude through high quality built environment
18	Compliance with SCI	0	0	0	Neutral impact
19	Voluntary organisations	0	0	0	Neutral impact
20	Wellbeing	✓	✓	✓	Improved well being through high quality built environment and protection of local historic environment
Overall this policy has many positive effects against the sustainability appraisal objectives in terms of landscape and character. There are no recommended changes to this policy					

**Policy I1: Infrastructure Delivery Policy**

SA Obj	Indicators	Effects over time			Comments
		Short	medium	long	
1	Employment rate	✓	✓	✓	Limited positive through infrastructure provision including element of employment
2	Employment land	0	0	0	Neutral effect
3	Vacant units	✓	✓	✓	Providing right infrastructure will assist with vitality and vibrancy

**Policy 11: Infrastructure Delivery Policy**

4	Farm diversification, affordable housing	√	√	√	√	Policy also applicable for delivery infrastructure in rural areas
5	Developments contrary to EA	√	√	√	√	Positive effect through necessary contribution to flooding and drainage infrastructure
6	Affordable housing	√	√	√	√	Positive through on site affordable housing provision
7	Public Transport access	√	√	√	√	Positive through suitable transport infrastructure provision
8	Crime	0	0	0	0	Neutral effect
9	Noise and light impacts	0	0	0	0	Neutral effect
10	Natural greenspace	√	√	√	√	Positive through provision of open space infrastructure
11	Renewable Energy	0	0	0	0	Neutral effect
12	SSSI quality	√	√	√	√	Limited positive through provision of open space infrastructure
13	Development on PDL	0	0	0	0	Neutral effect
14	River Quality	√	√	√	√	Positive effect through necessary water resource infrastructure
15	Buildings at risk	0	0	0	0	Neutral effect
16	Household change	0	0	0	0	Neutral effect
17	Attitude to area	√	√	√	√	Local attitude being improved through correct infrastructure provision
18	Compliance with SCI	0	0	0	0	Neutral effect
19	Voluntary organisations	0	0	0	0	Neutral effect
20	Wellbeing	√	√	√	√	Local well being improved through infrastructure provision

There would be many positive benefits across all sustainability objectives through the implementation of this policy and the provision of the necessary infrastructure at the right time. There are no recommended changes to this policy.



## ii Appraisal of policies against 'do nothing' option

The Sustainability Appraisal Commentary Report Volume 1 (January 2008) set out a 'do nothing' or 'business as usual' approach in terms of developing a Stafford Borough Local Plan. The appraisal concluded the following:

By continuing with policies and allocations in the Stafford Borough Local Plan 2001 rather than producing a new development strategy there may be have some environmental benefits as further large Greenfield development would not be permitted. The remaining allocations would provide land for 959 dwellings, with additional housing coming from windfall rates, both falling considerably lower than the 10,100 figure stated in the Regional Spatial Strategy. Continuing with the Stafford Borough Local Plan 2001 would undermine the delivery of affordable housing for the Borough. All employment sites identified in the Stafford Borough Local Plan 2001 have been part or completed. Not identifying any new employment allocations or employment policies may lead to increase need to travel outside of the Borough for employment. The Stafford Borough Local Plan 2001 does not include any policies on the requirement for renewable energy or for sustainable building design.

Since this appraisal the National Planning Policy Framework has been published and is now used to assess planning applications. The existing Stafford Borough Local Plan 2001 is given less weight and so it is appropriate to consider a 'do nothing' approach in relation to The Plan for Stafford Borough policies. A do nothing approach would mean only the NPPF would be used to assess future planning applications.

### Appraisal of policies against 'do nothing' option

Policy Number	Policy Name	Do Nothing Option
SP1	Presumption in favour of sustainable development	Presumption in favour of sustainable development
SP2	Stafford Borough Housing and employment requirements	Potential over supply of development
SP3	Stafford Borough Sustainable Settlement Hierarchy	Development will not necessarily be directed the most appropriate locations
SP4	Stafford Borough Housing Growth Distribution	Potential over supply of development
SP5	Stafford Borough Employment Growth Distribution	Potential over supply of development
SP6	Achieving Rural Sustainability	Development will not necessarily be directed the most appropriate locations
SP7	Supporting the Location of New Development	Development will not necessarily be directed the most appropriate locations
Policy Stafford 1	Stafford Town	Development will not necessarily be directed the most appropriate locations
Policy Stafford 2	North of Stafford	Piecemeal development without delivering strategic aims
Policy Stafford 3	West of Stafford	Piecemeal development without delivering strategic aims
Policy Stafford 4	East of Stafford	Piecemeal development without delivering strategic aims
Policy Stone 1	Stone	Development will not necessarily be directed the most appropriate locations
Policy Stone 1	West and South of Stone	Piecemeal development at any time without delivering strategic aims
E1	Local Economy	Development will not necessarily be directed the most appropriate locations
E2	Sustainable Rural Development	Development will not necessarily be directed the most appropriate locations
E3	Development within recognised industrial estates	Recognised industrial estates not identified

## ii Appraisal of policies against 'do nothing' option

Policy Number	Policy Name	Do Nothing Option
E4	Raleigh Hall and Ladfordfields Industrial Estates	Development will not necessarily be directed the most appropriate locations
E5	Major developed sites in the Green Belt	National Green Belt policy would apply
E6	Tourism	Development will not necessarily be directed the most appropriate locations or address potential impacts
E7	Canal Facilities and new marinas	Development will not necessarily be directed the most appropriate locations
E8	Town, Local and Other Centres	Unsustainable commuting and shopping patterns likely to be reinforced.
T1	Transport	Current patterns of transport use are likely to be reinforced
T2	Parking and Manoeuvring Facilities	Current patterns of transport use are likely to be reinforced
C1	Dwelling types and sizes	Fewer opportunities for provision of housing types where it is most needed.
C2	Affordable housing	Fewer opportunities for systematic provision of affordable housing where it is most needed.
C3	Specialist housing	Fewer opportunities for systematic provision of specialist housing where it is most needed.
C4	Housing conversions and subdivisions	Conversions and subdivisions to continue
C5	Residential proposals outside the settlement hierarchy	Development will not necessarily be directed the most appropriate locations
C6	Provision for gypsies, travellers and travelling show-people	Development will not necessarily be directed the most appropriate locations
C7	Open space, sport and recreation	Opportunities for enhanced provision and quality improvement likely to be more opportunistic.
N1	Design	Opportunities to promote sustainable design in all locations.
N2	Climate Change	Current patterns of energy use are likely to be reinforced with limited opportunities to plan for efficiencies of scale.
N3	Low carbon sources and renewable energy	Opportunities to promote low carbon sources and renewable energy limited
N4	The Natural Environment and Green Infrastructure	Appropriate development control policies will be applied, but opportunities to positively plan for habitat and species management will be fewer.
N5	Sites of European, National & Local Nature Conservation Importance	Appropriate development control policies will be applied, but opportunities to positively plan for habitat and species management will be fewer.
N6	Cannock Chase Special Area of Conservation (SAC)	Habitat Regulations Assessment will still be applied but opportunities to achieve holistic management may be fewer.
N7	Cannock Chase AONB	Planning Applications still to apply AONB Management Plan but opportunities to positively plan for the AONB limited
N8	Landscape Character	No reference to local landscape character types set out in policy

Policy Number	Policy Name	Do Nothing Option
N9	Historic Environment	Appropriate development control policies will be applied, but opportunities to positively plan for settlement-wide character will be less
I1	Infrastructure Delivery Policy	Infrastructure delivered in a piecemeal way





### **iii Appraisal of plan objectives against SA Objectives**

The Sustainability Appraisal Commentary Volume 2 (February 2009) appraised the plan objectives set out in The Plan for Stafford Borough - Issues and Options. The amended plan objectives as set out in The Plan for Stafford Borough - Publication are:

### iii Appraisal of plan objectives against SA Objectives

#### Key Objectives - Stafford

1. Provide new high quality homes between 2011 - 2031 across of range of sites including accommodation for an ageing population and military personnel
2. Create new communities supported by district centres, open space, sport & recreation provision, new health centres including GP surgeries and new primary schools
3. Deliver mitigation measures against any significant adverse impacts on the Cannock Chase Special Area of Conservation
4. Avoid development in flood risk areas
5. Provide new high quality employment land between 2011 - 2031 across a range of sites that mitigates against adverse impacts, made available for new research and development facilities as well as growth opportunities to provide new businesses for graduate employment and inward investment to diversify the economy
6. Enhance existing, and provision of significant, new green infrastructure and habitats in the area through green links, such as the canal, from the surrounding open countryside and the Cannock Chase Area of Outstanding Natural Beauty into the heart of Stafford to encourage healthy living for leisure time activities, whilst safeguarding and enhancing the landscape setting
7. New open space, sport and recreational facilities, including indoor and outdoor provision, to meet the needs of an increasing population
8. Deliver major new mixed use town centre retail schemes to make Stafford a significant sub regional centre for retailing, leisure and cultural attractions
9. Provide new development at Stafford to encourage greater retention of high quality Further & Higher Education professionals in the area and up-skill educational attainments
10. Support the role of public sector organisations who have their headquarters or a significant presence in Stafford including Staffordshire University, Stafford College, Staffordshire Police, the Ministry of Defence, the Prison Service and Health Service co-ordination
11. Deliver the Western Access Improvement Scheme to improve the transport network to the west of Stafford town centre, deliver the Northern Access Improvement scheme and implement Phase 1 of the Eastern Distributor Road
12. Deliver the conservation and enhancement of Stafford's heritage assets, including the character and appearance of its conservation areas

#### Key Objectives - Stone

13. Provide new high quality homes in mix and tenure across a range of sites that mitigate against any adverse impacts and support the sustainable community
14. Deliver a new health centre for Stone as part of future community facilities
15. Provide new high quality employment land across a range of sites which mitigates against adverse impacts, made available for new research and development facilities, as well as growth opportunities to provide for expansion to new and existing businesses to diversify the economy
16. Provide infrastructure, including an upgraded electricity distribution network, new sewage facilities, green infrastructure links, enhanced public transport and new education provision through housing developments
17. Deliver new mixed use town centre proposals to enhance Stone as a centre providing for retail, leisure, canal based and community activities
18. New open space sport and recreational facilities including indoor and outdoor provision to meet the needs of the community

19. Safeguard and enhance the landscape setting through new green infrastructure provision and habitat creation including supporting the role of the Trent Valley corridor through the town in terms of biodiversity, accessibility, recreation and community uses

20. Conserve and enhance the historic character and heritage assets of Stone and secure the sustainable use and management of its historic buildings

#### Key Objectives - Areas outside of Stafford & Stone

21. Provide for high quality new small scale housing development at appropriate villages that reflects their distinctive local character

22. Deliver sensitive additional facilities to provide an improved level of local services appropriate to settlements, reduce the need to travel and be in keeping with the local character, the historic environment and the rural setting

23. Provide increased rural employment through agricultural and livestock businesses, renewable energy schemes, low impact hi-tech industries in agricultural buildings and sensitive new tourist attractions that enhance the high quality environment of the area

24. Deliver new employment land through the expansion of existing industrial areas

25. Provide new high quality homes, including new affordable homes, on appropriate sites in existing villages, to support sustainable rural communities in the future

26. Support increased habitat maintenance, restoration and creation, and the encouragement of a diverse range of species as part of the strategic green infrastructure network across the Stafford Borough area, whilst also protecting designated sites, including the Special Areas of Conservation

27. New open space, sport and recreational facilities to meet the needs of the community, including through increased multi-use provision such as community halls

28. Encourage the sustainable management of heritage assets, especially those identified as at risk, and deliver development which respects local character and distinctiveness

The amended plan objectives are appraised against the SA objectives below.

#### Key

C	Plan objective compatible with Sustainability Objective
N	Plan objective considered to have a neutral effect on Sustainability Objective
Conflict	Plan objective conflicts with Sustainability Objective

Table 14 Appraisal of Plan Objectives against SA Objectives

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10
1	C	C	C	N	N	C	C	N	C	N
2	C	C	C	N	N	N	C	C	N	C
3	N	N	C	N	N	N	N	N	N	C
4	N	N	N	N	C	N	N	N	N	N
5	C	C	C	N	N	N	C	N	N	N
6	N	N	C	C	C	N	N	N	C	C
7	N	N	N	N	N	N	N	N	N	C
8	C	C	C	N	N	N	N	N	N	N
9	C	N	N	N	N	N	C	N	N	N



## Appraisal of plan objectives against SA Objectives iii

	SA11	SA12	SA13	SA14	SA15	SA16	SA17	SA18	SA19	SA20
12	N	N	N	N	C	N	N	N	N	C
13	N	N	N	N	C	C	N	N	N	C
14	N	N	N	N	N	C	N	N	N	N
15	N	N	N	N	N	C	N	N	N	N
16	C	N	N	C	N	C	C	N	N	N
17	N	N	N	N	C	C	N	N	N	N
18	N	N	N	N	N	N	N	N	N	C
19	C	C	C	C	C	N	N	N	N	C
20	N	N	N	N	C	N	N	N	N	C
21	N	N	N	N	C	C	N	N	N	C
22	N	N	N	N	C	C	N	N	N	C
23	C	C	N	N	C	C	N	N	N	C
24	N	N	N	N	N	C	N	N	N	N
25	N	N	N	N	N	C	N	N	N	C
26	C	C	N	N	N	N	N	N	N	N
27	N	N	N	N	N	N	N	N	N	C
28	N	N	N	N	C	N	N	N	N	C





## iv Cumulative Impacts

Cumulative effects have been considered throughout the Sustainability Appraisal process, as part of the SA, incorporating the SEA requirements and plan preparation. Assessing cumulative effects helps to identify the sum of both direct and indirect effects on receptors. Receptors may include natural resources, sections of the population or ecosystems and species. As part of this stage the following key receptors from Annex 1(f) of the SEA Directive have been considered as a means of assessing the cumulative effects of each preferred policy option;

1. Air
2. Water
3. Soil
4. Landscape
5. Atmosphere
6. Urban environment
7. Rural environment
8. People and community
9. Flora
10. Fauna
11. Habitats or ecosystems

In this regard, cumulative effects need to be considered in relation to the nature and extent of the receptor, such as ecosystems and communities as opposed to administrative boundaries.

Cumulative effects including any secondary and synergistic effects of all the preferred policy options against the sustainability objectives have been assessed and recorded using the table below using weighted positive (+), negative (-) and neutral (O) annotations. Where a cumulative effect has been identified from the suite of policies by a (++) or (- -) an overview of the impact on receptors has been provided. The assessment for each objective has been taken from the appraisal findings in i.1 'Appraisal Table'.

Policy	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10
Presumption in favour of sustainable development	+	+	+	+	+	+	+	+	+	+
Stafford Borough Housing and employment requirements	+	+		+		+	+	O		O
Stafford Borough Sustainable Settlement Hierarchy	+	+	+	+	+			+		
Stafford Borough Housing Growth Distribution			+	+		+	+		+	+
Stafford Borough Employment Growth Distribution	+	++	+	+	+	O	+		+	+
Achieving Rural Sustainability	+	+	+	+		+				O
Supporting the Location of New Development	+	+	+	+		+				O

## iv Cumulative Impacts

Policy	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10
Stafford Town	+	+	+	O	O	+	+		+	+
North of Stafford	++		+	O	+	++	+			+
East of Stafford	+	+	+	O	+	++	+			+
West of Stafford	+	O	+	O	+	++	+			+
Stone Town	+	+	O	+	+	+	+			+
West and South of Stone	+	+	+		+	+				+
Local Economy	++	++	++	++		+	+		+	O
Achieving rural sustainability	+	+	++	++	+	+	+	+	+	+
Development within recognised industrial estates	+	+	+	+	O	O	+	+	+	O
Raleigh Hall and Ladfordfields Industrial Estates	+	+	+	+	+	O	+		+	O
Major developed sites in the Green Belt	+	+	+	+	O	O	+		O	O
Tourism	+	+	+	+	O	O	+		+	+
Canal Facilities and new marinas	+	+	+	+	O	O	+		+	+
Town, Local and Other Centres	+	+	+	+	O	+	+	+	+	+
Transport	O	O	+	+		O	+	O	+	+
Parking and Manoeuvring Facilities	O	O	+	+	O	O	+			O
Dwelling types and sizes	O	O	+	+	O	++	O		+	+
Affordable housing	O	O	+	+		++				
Specialist housing	O	O	+	+		++	+		+	O
Housing conversions and subdivisions	O	O	+	+	+	+	+		+	O
Residential proposals outside the settlement hierarchy	O	O	+	+	+	++	+		+	O

Policy	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10
Provision for gypsies, travellers and travelling show-people	+	O	O	O	+	+				+
Open space, sport and recreation	O	O	+	+	+	O	+	+	O	++
Design	O	O	+	+	O	O	+	+	+	+
Climate Change				+	++	O	O	O	O	+
Low carbon sources and renewable energy						O	O	O		O
The Natural Environment and Green Infrastructure	O	O	+	+	+	O	+		+	+
Sites of European, National & Local Nature Conservation Importance	O	O	+	+	+	O	+		+	+
Cannock Chase Special Area of Conservation (SAC)	O	O		O	O	O		O		
Cannock Chase AONB	+	+	+	+	O		O		+	+
Landscape Character	O	O	+	+	+	O	O	O	+	+
Historic Environment	O	O	+	+	O	O	O		+	+
Infrastructure Delivery Policy	+	O	+	+	+	+	+	O	O	+
Cumulative effect	+		++	+						+
Reference numbers to key receptors affected	8	6,7,8	6,7,8	7,8	4,6,7,8,11	6,7,8	6,7,8	6,7,8	8,10,11	8

Policy	SA11	SA12	SA13	SA14	SA15	SA16	SA17	SA18	SA19	SA20
Presumption in favour of sustainable development	+	+	+	+	+	+	+	+	O	+
Stafford Borough Housing and employment requirements						+			O	

## iv Cumulative Impacts

Policy	SA11	SA12	SA13	SA14	SA15	SA16	SA17	SA18	SA19	SA20
Stafford Borough Sustainable Settlement Hierarchy	O	+	+			+	+		O	O
Stafford Borough Housing Growth Distribution	O	+	+			+	+		O	O
Stafford Borough Employment Growth Distribution		+	+	+	+	+	+		O	+
Achieving Rural Sustainability	+	+	+	+	+	+	O		O	+
Supporting the Location of New Development	-	+	-	+	+	+	+			+
Stafford Town		+	-	+	+	O	O	O	O	O
North of Stafford		+	-	+		O	O	O	O	O
East of Stafford		+	-	+		O	O	O	O	O
West of Stafford		+	-	+		O	O	O	O	O
Stone Town	+	+		+	+	+	+	O	O	+
West and South of Stone		+	-	+	+	+	O	O	O	O
Local Economy		O		O	+	+	O	O	O	+
Achieving rural sustainability	+	+	+	+	++	++	+	O	O	+
Development within recognised industrial estates	O	O	+		+	O	O	O	O	O
Raleigh Hall and Ladfordfields Industrial Estates	O	+	-	+	+	+	O	O	O	O
Major developed sites in the Green Belt		+	++	O	+	+	O	O	O	O
Tourism	+	+		+	+	O	O	O	O	O
Canal Facilities and new marinas		+	+	+	+	O	O	O	O	O
Town, Local and Other Centres	+	O	+	O	+	O	O	O	O	O
Transport	+				O	O	O	O	O	O
Parking and Manoeuvring Facilities	+	O	+	O		O	O	O	O	O

Policy	SA11	SA12	SA13	SA14	SA15	SA16	SA17	SA18	SA19	SA20
Dwelling types and sizes		O			+	+	O	O	O	O
Affordable housing					+	+	O	O	O	O
Specialist housing			+		+	+	O	O	O	O
Housing conversions and subdivisions	+		++		+	O	O	O	O	O
Residential proposals outside the settlement hierarchy	+	+	+	+	+	+	O	O	O	+
Provision for gypsies, travellers and travelling show-people	+	+		+	+	O	O	O	O	O
Open space, sport and recreation	++	O	O	O	+	+	O	O	O	O
Design	+	+	+	O	++	+	O	O	O	O
Climate Change	++	+	O	++	+	+	O	O	O	+
Low carbon sources and renewable energy	++	O			O	O	O	O	O	O
The Natural Environment and Green Infrastructure	++	++	+	++	++	+	O	O	O	O
Sites of European, National & Local Nature Conservation Importance	+	++	+	++	++	+	O	O	+	O
Cannock Chase Special Area of Conservation (SAC)		+	O	O	++		O	O		O
Cannock Chase AONB	+	+	+	+	++	+	O	O	+	O
Landscape Character	O	+	+	+	+	O	O	O	O	O
Historic Environment	O	O	+	O	++	O	+	O	O	+
Infrastructure Delivery Policy	O	+	O	+	O	O	+	O	O	+
Cumulative effect		+		+	+	O	O	O	O	O



iv Cumulative Impacts

Policy	SA11	SA12	SA13	SA14	SA15	SA16	SA17	SA18	SA19	SA20
Reference numbers to key receptors affected	1, 4, 5, 8, 11	4, 9 10, 11	2, 3, 4, 6, 7, 11	2,3,5,6,7,11	4,6, 7, 8	8	8	8	8	8

## v Appraisal of alternatives

A number of alternative development strategies and location options have been consulted on as part of 'The Plan for Stafford Borough' process. This section looks at the appraisal of these in more detail.

The results and recommendations of each Sustainability Appraisal stage were reported to Stafford Borough Council members alongside the responses to the consultation on the planning document. The recommendations of the Sustainability Appraisal, along with outcomes from the evidence base and responses to each consultation document were used by the policy team in producing the next stage in the plan process.

### Development Strategy

The Sustainability Appraisal Commentary Volume 1, January 2008, appraised the following 6 broad development strategy options:

#### Option 1 - Stafford Focused

Stafford, as the largest town, has the greatest opportunity for providing employment, economic growth, housing and public transport. It is therefore the most sustainable location for development. However by providing all development in Stafford, the rural areas may suffer in terms of a lack of housing and employment, resulting in a greater need to travel or move elsewhere. Locating all development in one location may require greater use of Greenfield land.

#### Option 2 - Stafford & Stone Focused

Stone, being the second largest settlement in the Borough also provides opportunity for providing employment, economic growth, housing and public transport. Stone acts as a rural hinterland for smaller rural settlements and development could meet the needs of some of these areas. Development in Stafford and Stone may offer greater scope for using previously developed land, which will reduce the need to develop on Greenfield land.

#### Option 3 - Stafford, Stone & Principal Settlements

The principal settlements are identified as Barlaston, Eccleshall, Gnosall, Hixon, Little Haywood and Colwich, and Great Haywood. All of these settlements have good services and facilities in terms of schools, post office and other convenience stores, public transport and village / community hall. Some of these settlements, in particular Eccleshall and Hixon, have good access to employment areas. This option may be the most sustainable by providing appropriate development to meet the needs of the urban and rural population. However, the principal settlements may have less scope for using previously developed land, leading to Greenfield development.

#### Option 4 - Stafford & Principal Settlements only

This option would restrict any development in Stone. As stated above, Stafford and the principal settlements do represent sustainable settlements. Due to the geographic spread of these settlements, they could act as service centres for rural settlements across the Borough. However not all Principal Settlements provide the range of services and facilities as in Stone, for example not all have a medical facility.

#### Option 5 - Selected Settlement Growth Points

This option would involve development at selected settlement growth points. It was not made clear which specific settlements would be selected as growth points. The settlements with existing good access to employment, facilities and public transport or where such services could be provided would be the most sustainable settlements as growth points. This option may involve greater need for Greenfield land and, as a result, may have greater landscape and biodiversity impacts.

#### Option 6 - Growth Distributed Widely

Whilst this option would allow more settlements to experience growth, not all settlements would be suitable for development, due to a lack of facilities, including a regular bus services. Some settlements are washed over by Green Belt designation or are within or close to other designations such as the Area of Outstanding Natural Beauty, restricting potential future development.

#### 'Business as usual'

By continuing with policies and allocations in the Stafford Borough Local Plan 2001 rather than producing a new development strategy there may be some environmental benefits as further large Greenfield development would not be permitted. The remaining allocations would provide land for 959 dwellings, with additional housing coming from windfall rates. However this would be considerably less than the provision stated in the Regional Spatial Strategy or most recent household projections. Continuing with the Local Plan would undermine the delivery of affordable housing for the Borough. All employment sites identified in the Local Plan 2001 have been part or fully completed. Not identifying any new employment allocations or employment policies may lead to an increase need to travel outside of the Borough for employment. The Local Plan 2001 does not include any policies on the requirement for renewable energy or for sustainable building design.

#### Options taken forward

Overall options 3 and 4 were selected as being the most sustainable choices for the development strategy, due to the sustainability of Stafford, Stone and the Principal Settlements. Broad location options around these settlements were then taken forward for public consultation and appraisal through the 'Delivering the Plan for Stafford Borough - Issues and Options' document.

#### Location Options for development

The Sustainability Appraisal Commentary Volume 2, February 2009, appraised broad location options set out in *Delivering The Plan for Stafford Borough: Issues and Options*. This document outlined broad location options for development in the following settlements and industrial areas:

- Stafford
- Stone
- Eccleshall
- Gnosall
- Great Haywood
- Little Haywood & Colwich
- Hixon
- Weston
- Haughton
- Woodseaves
- Tittensor
- Yarnfield
- Ladfordfields Industrial Estate
- Rateigh Hall Industrial Estate
- Hixon Airfield Industrial Estate

## Stafford

By providing sufficient employment alongside housing, the Stafford options can achieve sustainability. No option stands out in terms of being completely sustainable, as all will have certain impacts, and all options will have demands on resources and energy supply. Options SF11 and SF12 offer more positive impacts in terms of access and a reduced need to travel, but also has a high number of negative impacts in terms of landscape and biodiversity.

In general, there are landscape, flood and biodiversity issues in several location options which should be addressed from the outset. In terms of the historic environment, location options SF1, SF3, SF4, SF5, SF9, SF10, SFd and SFe are located in areas of highest sensitivity. Development to the north of Stafford needs to consider natural landscape objectives of landscape restoration, development to the east and west needs to consider landscape maintenance and to the south / south east objectives of landscape enhancement. There are areas in and around Stafford, particularly along the river corridor and to the north / north east, where the landscape is at risk of rapid loss of character and quality.

Six of the location options; SFb, SFd, SFe, SFg, SF5 and SF8 include areas within flood zone 3. Other options, in particularly SF1 and SF2 may have flood impacts further downstream due to the existing natural drainage system. Development at SF11 and SF12 may require investigation into drainage of these sites.

Due to the proximity of some of Stafford to the Cannock Chase Special Area of Conservation (SAC), a full Appropriate Assessment will be required for all options, in order to investigate possible negative impacts and mitigation measures. Possible negative impacts are outlined in the ii 'Habitat Regulations Assessment' section.

Of the town centre options for office and retail development, all options offer positive impacts in terms of access, using previously developed land, boosting employment and local economy.

For several options, there are issues of town character, in particular the Conservation Area and for SFTC-T2 there may be impacts on the adjacent Kingsmead Local Nature Reserve. Due to existing flood issues within Stafford town, it is unsure what impacts increased development would have as many areas within the town centre are affected by flood zones 2 and 3.

## Stone

By providing sufficient employment alongside housing, the Stone options can achieve sustainability. No option stands out in terms of being completely sustainable, as all will have similar identified negative and positive impacts. Location options SN3, SN4 and SN5 have less negative impacts identified, but still have issues of landscape impact and loss of greenfield land.

In terms of the historic environment, location options SN3, SN4 and SNa are located in areas of highest sensitivity.

Development to the west of Stone needs to consider natural landscape objectives of landscape restoration and to the south and southeast objectives of landscape maintenance. Land to the west of Stone is considered to be of highest landscape sensitivity.

One option, SNa includes an area within flood zone 3, with SN5 lying adjacent to the flood zone.

Of the town centre options for office and retail development, all options offer positive impacts in terms of access, use of previously developed land, providing services to the local and rural area and also contributing towards the local economy and employment levels. For one location option, SNTC-T5 there is an issue of flood risk and a Flood Risk Assessment may be required. All town centre location options could have an impact on the Stone Conservation Area, and any development should be in line with actions listed in the adopted Stone Conservation Area Appraisal.

## Gnosall

Whilst Gnosall offers a range of services and facilities, there are limited employment opportunities. It may be appropriate to consider some of the location options, in particular GN3 and GN4 for employment. It may also be appropriate to retain, enhance and provide public access at the existing open space at Gnosall Heath to cater for recreation needs of an increased population.

In terms of the historic environment, location options GN2, GN4, GN5, GN8 and GN9 are located in areas of highest sensitivity.

Development to the north of Gnosall needs to consider natural landscape objectives of landscape maintenance and to the south objectives of landscape enhancement. All land surrounding Gnosall is considered to be of highest landscape sensitivity, with land to the north / north west and south / south west at risk of rapid loss of character and quality.

One location option, GN8 includes an area within flood zone 3, with GN5 lying adjacent to the flood zone.

### **Eccleshall**

Housing development in Eccleshall may be appropriate due to services, facilities and proximity to Raleigh Hall Industrial Estate. It may be appropriate to provide additional open space and recreational facilities, especially in accessible locations.

In terms of the historic environment, location option EC2 is located in the area of highest sensitivity. Location option EC5 is adjacent to Eccleshall Conservation Area.

Development to the east of Eccleshall needs to consider natural landscape objectives of landscape restoration and to the west objectives of landscape maintenance. Land to the west of Eccleshall is considered to be of highest landscape sensitivity.

No options lie within flood zone 3, although there may be flood, drainage and water quality issues to the north of the settlement, and so a Flood Risk Assessment may be required for location option EC1.

### **Great Haywood and Little Haywood and Colwich**

All development needs to be of a high quality design in order to protect and enhance the Conservation Areas, the Cannock Chase AONB and Shugborough Park and Garden.

In terms of the historic environment, location options GN2, GN3, LH1 and LH2 are located in areas of highest sensitivity.

Development between the Haywoods needs to consider natural landscape objectives of landscape maintenance and to the north objectives of landscape regeneration and enhancement.

Land to the west of The Haywoods is considered to be of highest landscape sensitivity.

Whilst no options lie within flood zone 3, it may be appropriate to investigate local flood, drainage and sewage systems, which have been raised as an issue.

### **Hixon**

The development options in Hixon provide some opportunity to use brownfield land. Hixon only has a basic level of services and facilities compared to the other larger villages, and so additional services, such health care and a more frequent bus service may be required.

In terms of the historic environment, location options H11, H12, H13 and H14 are located in areas of highest sensitivity.



Development to the west of Hixon needs to consider natural landscape regeneration and to the east objectives of landscape enhancement. Land to the west of Hixon is considered to be of highest landscape sensitivity.

No options lie within flood zone 3.

### **Haughton**

Haughton has good transport links and public transport to Stafford and Newport, along with a suitable level of services and facilities.

In terms of the historic environment location options HN1, HN2, HN3, HN5 and HN6 are located in areas of highest sensitivity.

Development to the north of Haughton needs to consider natural landscape objectives of landscape restoration, maintenance and enhancement and to the south objectives of landscape enhancement. Land to the west is considered to be at risk of rapid loss of character and quality.

Whilst no options lie within flood zone 3, further investigation into localised flooding and drainage issues to the north of the settlement may be required.

### **Weston**

Weston has reasonable services and facilities and this location option is considered to be of low sensitivity in terms of the historic landscape. Areas of high historic landscape sensitivity are within the existing built up area of Weston and so development needs to be of high quality design.

Development at location option WT1 needs to consider natural landscape objectives of landscape regeneration.

Whilst this is the only location surrounding the village west of the A51 which does not lie within the flood zone, possible impacts should still be investigated.

### **Woodseaves**

Whilst Woodseaves has some services and facilities, if the majority of development options took place additional services and facilities, such as healthcare, open space and recreation and an improved bus service should be considered.

Development on the edge of Woodseaves needs to consider natural landscape objectives of landscape maintenance and to the north / north east objectives of landscape regeneration. The majority of land surrounding Woodseaves is considered to be of highest landscape sensitivity, with land to the south / south east considered at risk of rapid loss of character and quality.

No options lie within flood zone 3.

### **Yarnfield**

This development, whilst providing housing on previously developed land, would result in loss of employment, requiring people to travel elsewhere for work. Depending on the scale of development, there may be issues of sewage treatment and flooding in the settlement, which have been raised in the past. Improvements to the local bus service should be considered.

### **Tittensor**

Developing these location options for housing would involve using previously developed land but would result in loss of employment. Tittensor does have good transport links to larger settlements.

Development would need to consider providing open space and mitigation measures for biodiversity along with impacts on the adjacent flood zone.

### Industrial Area Options

Development at Ladfordfields would be an extension to the existing industrial estate. There is currently no public transport to the site and this should be addressed. This site contains water features, which could have biodiversity value.

Development at Raleigh Hall would be an extension to the existing industrial estate, which may provide employment for the rural areas of the Borough. Although there is a bus service to Raleigh Hall, a more regular service / green travel plans could help reduce the need to travel by car. This area contains some water and tree features, which may have biodiversity value.

### Consultations in 2010

In 2010 the following Local Plan consultations took place:

- Delivering the Plan for Stafford Borough - Draft Core Policies (February 2010)
- Delivering the Plan for Stafford Borough - Local Choices (November 2011)

The Draft Core Policies set out draft wording for the following policies:

- Draft Core Policy on Climate Change
- Draft Core Policy on Renewable Energy
- Draft Core Policy on Environmental Quality
- Draft Core Policy on the Cannock Chase AONB
- Draft Core Policy on Landscape Character
- Draft Core Policy on Safeguarding the Integrity of European Sites
- Draft Core Policy on the Cannock Chase Special Area of Conservation
- Draft Core Policy on Green Belt
- Draft Core Policy on range of Dwelling Types, Density and Sizes
- Draft Core Policy on Affordable Housing
- Draft Core Policy on Rural Exception Housing
- Draft Core Policy on Lifetime Homes
- Draft Core Policy on Specialist Housing
- Draft Core Policy on Gypsies and Travellers
- Draft Core Policy on the Local Economy
- Draft Core Policy on Retail
- Draft Core Policy on Tourism
- Draft Core Policy on Design
- Draft Core Policy on the Historic Environment
- Draft Core Policy on Open Space, Sport and Recreation
- Draft Core Policy on Transport



The Local Choices document set out the following policy assumptions:

- The Plan will not contain changes to existing current Green Belt boundaries, or present policies.
- The Plan period will cover the extended period from 2006 to 2031, rather than 2026 as previously.
- The Plan should guide the development averaging 500 new homes each year across Stafford Borough, of which the majority should be at Stafford town.
- New housing development in the County Town must have the necessary road and other key infrastructure associated with this increased growth.
- In Stone housing allocations will be limited to 500 new homes, and for this to be built after 2021.
- No new housing development should be allocated in the rural areas, apart from small-scale infill within existing village boundaries. There will be no changes to existing Residential Development Boundaries except where local communities wish to have new development.
- Small sites on the edge of settlements for housing, where there is overwhelming local interest demonstrated through a parish survey will be supported.
- The Plan will be committed to providing 8 hectares of new employment land each year over the Plan period to 2031. At Stafford town, at least 40 hectares of new employment land will be allocated at the start of the Plan period.
- There will be an allocation of up to 20,000 square metres of new retail land for non-food shopping in Stafford town centre.
- Replacement employment land should be allocated to provide for future needs in the Stone area. There will be a choice, either no additional employment land will be allocated, or a new site could be provided on land extending to the south of Stone Business Park (approximately 10 hectares).
- In areas outside of Stafford and Stone, no additional employment land will be allocated, or limited growth could be identified on land north of Ladfordfields industrial estate near Seighford, and west of Raleigh Hall industrial estate near Eccleshall.

Neither document was accompanied by a sustainability appraisal but it is considered that broad alternative strategy options and draft policies wording have been appraised in other reports set out in the table below:

Table 15 Elements of The Plan that have been subject to Sustainability Appraisal

Element of Plan	Where appraised
Broad Development Strategy Options	Sustainability Appraisal Commentary Vol 1 (January 2008)
Development Strategy number options	Strategic Policy Choices - Sustainability Appraisal (May 2012)
Draft Policies	Sustainability Appraisal Report (September 2011)
Alternative location specific options	Sustainability Appraisal Commentary Vol 2 (February 2009)
Suggested alternative development strategy	Revised Sustainability Appraisal Report (January 2012)

**Options progressed to Draft Publication**

**Options taken forward in the Draft Publication 2011**

Following the consultation and Sustainability Appraisal process the following Spatial Strategy was taken forward in The Plan for Stafford Borough - Draft Publication:

### Key Urban Centres

Stafford Borough will accommodate new growth and investment over the plan period to enable it to flourish and provide a place where people want to live and work. Throughout the Borough, provision will be made for the development of at least 500 dwellings per year over the plan period, including military housing requirements and provision for gypsies as well as 8 hectares per year of employment land to provide for the future needs and prosperity of residents (refer to Appendix 1 for more details). The Borough Council will ensure that the majority of future development will be delivered to the most sustainable locations and will work together with its partner organisations to ensure that the required level of infrastructure and facilities are delivered to the following areas:

- Stafford
- Stone

Strategic Development Locations (SDLs) at the main urban centres of Stafford and Stone will be delivered on a phased basis to ensure a consistent delivery of houses for the Plan period is achieved, having regard to the necessary infrastructure and environmental requirements. SDLs may be brought forward from a later phasing period where this would not undermine the delivery of sustainable development, including the availability of infrastructure. Development in Stone may be phased later in the Plan period where the cumulative completion rates for the Borough exceed 500 new homes per year.

### Existing Towns and Villages

The smaller rural villages comprise the key rural settlements and should continue to serve their local populations through the diverse range of services and facilities they provide. These villages could be suitable for a small amount of new development facilitated by minor amendments to Residential Development Boundaries through the neighbourhood planning process or a subsequent Site-specific Allocations and Policies Development Plan Document where local need arises to support rural sustainability and maintain local services.

Proposals for housing development or redevelopment within a defined Residential Development Boundaries of existing towns and villages will be acceptable subject to the provision of other relevant policies and should:

- i. Be accessible to everyone, regardless of mobility requirements;
- ii. Where appropriate ensure adequate vehicular, pedestrian and cycle access, as well as cycle and short stay parking facilities on the site; and
- iii. Not adversely affect the residential amenity of the locality.

### The Countryside

The countryside will be protected for its own sake. New development in the countryside will be restricted beyond Residential Development Boundaries to housing essential for farming, forestry or the operation of a rural based enterprise; or housing meeting the rural exception policy.

The following location options were taken forward:

North of Stafford (made up of previous location options SF-1, SF-2 and SF-h)

West of Stafford (made up of previous location options SF-11, SF-12 and SF-F and land opposite SF-F and land north of Doxey not previously appraised)

East of Stafford (made up of previous location options SF-4, SF-c and existing housing allocation HP11)

West and South of Stone (made up of previous options SN-4 and SN-b)

North of Ladfordfields (made up of previous location option LA-c)

Raleigh Hall (made up of previous location option RH-b)

Stafford Town Centre boundary alteration (incorporating previous options SFTC-T2, STC-T3, SFTC-T4, SFTC-T6, SFTC-T9 and SFT10)

Stone Town Centre boundary alteration (incorporating previous option SNTC-T5 Land south of Crown Street)

\* It should be noted in this Revised Sustainability Appraisal Report that planning applications have been approved for:

- Housing development at location option EC-4 (Land north of Community Centre at Trinity Road, Eccleshall) for approx 80 dwellings
- Location option YN-1 (Land at BT Training Centre, north of Yarnfield) for 300 dwellings.
- Location option SF-5 (Land east of Fairway) for approx 270 dwellings
- Location option SF-d (Land east of Fairway) for approx 3.5 hectares of employment land

These options had been previously appraised.

#### Options not taken forward

Stafford	Stone
SF-3 Land north & south of Tixall Road	SN-1 Land north of Pingle Lane
	SN-2 Land north of Lichfield Road
SF-6 Land east of Stockton Lane	SN-3 Land south of Eccleshall Road
SF-7 Land east of Cannock Road A34	SN-5 Land north of A34 at The Fillybrooks
SF-8 Land west of Cannock Road A34 and east of River Penk	SN-a Land between A51 Stone bypass and A34 Stafford Road
SF-9 Land west of Wolverhampton Road A449	
SF-10 Land south of School Lane, Rickerscote and west of River Penk	
SF-a Land east of Beaconside	

## v Appraisal of alternatives

Stafford	Stone
SF-b Land west of Tollgate Drive	
SF-e Land east of Wolverhampton Road A449	
SF-f Land east of Kingsway	
SF-g Land south of Creswell Grove	
SF-i Land east of A34 Stone Road	
<b>Gnosall</b>	<b>Woodseaves</b>
GN-1 Land north of Gnosall	WO-1 Land north of Dicky's Lane
GN-2 Land east of Gnosall within the Audmore Loop	WO-2 Land south of Stafford Road
GN-3 Land east of Gnosall, north of Stafford Road	WO-3 Land east of Newport Road
GN-4 Land south of Stafford Road and east of Lowfield Lane	WO-4 Land south of Moscow Lane
GN-5 Land at Gnosall Heath, east of Cowley Lane	WO-5 Land west of Newport Road
GN-6 Land at Gnosall Heath, west of Cowley Lane	WO-6 Land south of The Green
GN-7 Land at Gnosall Heath, south of dis-used railway and east of Plardiwick Road	WO-7 Land north of The Green
GN-8 Land west of Gnosall, north west of Brookhouse Road	<b>Weston</b>
GN-9 Land north of Gnosall, north east of Knightley Road	WN-1 Land south of Green Road
Great Haywood & Colwich and Little Haywood	<b>Haughton</b>
GH-1 Land west of Main Road	HN-1 Land west of Station Road
GH-2 Land south of A51 and adjacent to Little Tixall Lane	HN-2 Land east of Station Road
GH-3 Land east of Main Road and north of The Ring	HN-3 Land east of Brazenhill Road
LH-1 Land north of Main Road and west of Coley Lane	HN-4 Land north of Rectory Lane
LH-2 Land south of A51 and west of Coley Lane	HN-5 Land east of Park Lane
	HN-6 Land west of Park Lane

<b>Stafford</b>	<b>Stone</b>
<b>Tittensor</b>	<b>Eccleshall</b>
TT-1 & TT-2 Land at Bassett's Transport, east of A34 Stone Road	EC-1 Land north of Stone Road
<b>Ladfordfields</b>	EC-2 Land east of Eccleshall between Stafford Road and Stone Road
LA-a Land south of Bridle Lane	EC-3 Land south of Eccleshall adjacent to Green Lane
LA-b Land north of Woodseaves Road	EC-5 Land west of Eccleshall between Shaws Lane and Church Street
<b>Raleigh Hall</b>	
RH-a Land off Cold Meece Road	
<b>Hixon</b>	<b>Hixon Employment Options</b>
HI-1 Land east of Stowe Lane	HI-a Land between London Road and Church Lane
HI-2 Land north of Puddle Hill	HI-b Land west of Church Lane
HI-3 Land south of Puddle Hill	HA-a Land west of Stowe Lane
HI-4 Land north of Egg Lane	HA-b Land west of Hixon Airfield Industrial Estate Road
HI-5 Land east of Church Lane	HA-c Land north of New Road
HI-6 Land west of Stowe Lane	

The reasons for not taking forward broad location options as part of the development strategy are:

Stafford Southern Direction of Growth: Location options SF-7, SF-8, SF-9, SF-10 & SF-e

- A major new road scheme required (Southern Distributor Road) at significant cost to cross floodplain areas, the River Penk and the Staffordshire & Worcestershire Canal Conservation Area, whilst being reliant on the Eastern Distributor Road, which has limited evidence of solving Stafford's existing transport problems. Significant uncertainty about developer viability for scheme.
- Lack of proximity to local employment areas
- Potential impact on the Cannock Chase Special Area of Conservation, Biodiversity Alert Site (adjacent to Wildwood), River Penk corridor and associated waterways
- Landscape at risk of rapid loss of character and quality with potential impact on the setting of the West Midlands Green Belt and the Cannock Chase Area of Outstanding Natural Beauty
- Mid level Historic Environmental Character Value with a small area of high Historic Environmental Character Value, adjacent to Walton-on-the-Hill Conservation Area, thus some impact from new development.
- Significant waste water treatment upgrades required together with a local electricity sub-station and re-inforced water supply network

## v Appraisal of alternatives

- Location option SF-8 would need to be allocated through the South Staffordshire District Council Core Strategy, being in the neighbouring administrative area
  - The area forms part of the River Penk floodplain and part of the River Penk and Staffordshire & Worcestershire Canal corridors
  - Key landowner of location option SF-10 is unwilling to release land for housing and employment development
  - Access difficulties for location option SF-9
  - The Environment Agency has identified location options SF-9 & SF-10 for further flood risk investigation work through a Level 2 Strategic Flood Risk Assessment (SFRA2).
  - SF-7 may also need to be assessed dependant on the extent of development boundaries.
- Eastern Direction of Growth:      Locations SF-3, SF-5, SF-6, SF-d
- A major new road scheme required at significant cost to cross the River Trent, the canal and floodplain areas which has limited evidence of solving Stafford's existing transport problems by simply re-distributing pressure point locations. Significant public sector investment would be needed.
  - Proximity of Location SF-3 to the Branscote Sewage Treatment Works
  - Significant nature conservation assets including Baswich Meadows Site of Special Scientific Interest (SSSI) and Kingston Pool Covert Local Nature Reserve (LNR).
  - Highest Historic Environmental Character Value with significant impact from new development including parts of the Tixall Park Estate and St Thomas' Priory Scheduled Ancient Monument, Staffordshire & Worcestershire Canal Conservation Area.
  - Landscape at risk of rapid loss of character and quality
  - Clean water supply and foul water infrastructure requirements
  - Location SF-6 is on prominent high ground and has implications for delivering the Eastern Distributor Road
  - The Environment Agency has identified Location SF-5 for further flood risk investigation work through a Level 2 Strategic Flood Risk Assessment (SFRA2).
- Northern Direction of Growth:      Locations SF-a, SF-b
- Major electricity sub-station (£3million), gas infrastructure and waste water treatment upgrades required to bring forward new development
  - Land ownership issues
  - Ecological and biodiversity importance undermined by industrial development, including Marston Brook
- Stone Eastern Direction of Growth:      Location Options SN-1 & SN-2
- New road viability is a very significant threat.
  - Increased traffic volumes and pressure to access Stone town centre
  - High landscape value area affected by locations options SN-1 and SN-2.
  - Protected species are present.
  - Responses to the public consultation raised concerns about surface water run-off at location option SN-1 and the new flood alleviation scheme.
  - The Environment Agency has identified location option SN-1 for further flood risk investigation work through a Level 2 Strategic Flood Risk Assessment (SFRA2).
- Stone Western Direction of Growth:      Location Options SN-3, SN-5, SN-a & SN-b
- Existing road infrastructure can be used to provide development off the B5026 Eccleshall Road but would require enhancement of A34 junction
  - Further extension toward M6 motorway
  - Mid level Historic Environmental Character Value thus some impact from new development and high value immediately to the north.
  - There are protected species present.



- Responses to the public consultation raised concerns about surface water run-off at location option SN-3 affecting existing properties.
- The Environment Agency has identified location options SN-5 may need to be assessed dependant on the extent of development boundaries.

The Draft Publication through the identification of amended town centre boundaries also meant the following options previously identified were not taken forward as areas within an identified town centre boundary.

Stone Town Centre Option	Stafford Town Centre Options
SN-TC-T1 Land south of Christchurch Way	SFTC-T1 Land at corner of Chell Road and Glover Street
SN-TC-T2 Land on corner of Newcastle Street	SFTC-T5 Land south of Broadeye
SN-TC-T3 Land south of Newcastle Street	SFTC-T7 Land south of Tenterbanks
SN-TC-T4 Land north of Crown Street	SFTC-T8 Land at corner of Station Road and Newport Road
SN-TC-T6 Land south of Abbey Street	

### Strategic Policy Choices

Following the intended abolition of the Regional Spatial Strategy and the replacement of Planning Policy Statements with the National Planning Policy Framework, the Strategic Policy Choices set out varying options for consideration before The Plan for Stafford Borough was published. The options included three options for the level of development, three options for the settlement hierarchy, two options for an affordable housing policy and two options for delivery of the strategy. These options were appraised in the Strategic Policy Choices: Sustainability Appraisal, published May 2012.

The 10 policy choices were:

1. Provision at 500 new houses and 8 hectares of employment land per year
2. Reducing provision, for example to 250 new houses and 4 hectares of new employment land per year
3. Increasing provision, for example to 750 new houses and 12 hectares of employment per year
4. New development focused on the County Town of Stafford only
5. New development focused on the County Town of Stafford, the market town of Stone and either one or more of the Key Service Villages
6. New development distributed widely across the Borough to each of the Key Service Villages, cross border settlements and other identified settlements across the Borough as well as at Stafford and Stone
7. A policy of 30% across all areas of the Borough for affordable housing
8. Area specific affordable housing targets based on the evidence contained in the affordable housing viability assessment
9. Establishing a criteria based policy to guide where new development could take place
10. Establish the principle of development boundaries to identify where new development can take place either through Neighbourhood Plans or through a subsequent Site Allocations Document which would be subject to full public consultation

### Conclusion of Sustainability Appraisal of Strategic Policy Choices



Potential positive impacts were seen across several sustainability objectives, including delivery of housing, employment land and meeting community needs. There were several uncertain and negative effects identified due to pressure on the environment and infrastructure from increased development along with additional contributions to factors affecting climate change. It should be recognised that the appraisal did not look at detailed policy wording and so many of the uncertain or negative effects would be overcome through appropriate wording, such as considering landscape, biodiversity impacts or requiring a certain standard of development within a policy which would be used to assess planning applications, as now set out in The Plan for Stafford Borough - Publication.

The SA acknowledged that the identified settlement strategy preferred in the Strategic Policy Choices is appropriate in that it would provide development across a variety of settlements which would meet both urban and rural needs. The preferred level of development of 500 dwellings per year and 8 hectares per year is considered appropriate against a higher or lower level as this would meet local needs as well as some migration needs, as set out in household projections. This level of development is comparable to the Regional Spatial Strategy Phase II. There is concern that there could be an over provision of employment land over the lifetime of the plan, however this could be addressed through policy wording. The SA also recognises that the level of development, whilst a continuation of the average which has been delivered over the last 10 years, would still have contributions to factors affecting climate change.

The SA concluded for the delivery of affordable housing a flexible approach which considers different thresholds is more appropriate as this would allow for a higher delivery in those areas which are more viable. The SA recommended that a basis of 30% should be used unless independent studies show a higher proportion is viable in which case this should be required in those areas..

The SA concluded that the criteria for the policy to guide delivery of new development that is not strategic, i.e not identified as an allocation in The Plan for Stafford Borough to have many positive effects in that it considers a number of factors. However it was recognised that it could be improved to include a requirement for local consultation, not just with neighbouring properties, a requirement for sites to be on previously developed sites, consideration of green networks and green infrastructure and opportunities for a low carbon network.

The same criteria was used to appraise the approach for identifying development boundaries. The SA concluded that using this option alone could delay development in the short term due to time taken to produce a subsequent allocation document or neighbourhood development plan which could have an impact on meeting housing needs in settlements outside Stafford and Stone in particular. It is considered this approach would not have a negative impact on employment sites as there would be strategic site allocations on employment sites and there would continue to be boundaries around existing employment sites. The SA recommended that both a criteria based policy is adopted with additional criteria along with the opportunity to introduce residential development boundaries where considered necessary is the most appropriate option as it would allow for development to take place in advance of an allocation document being adopted. A criteria based policy alone, without the recommended additions would not provide certainty to local communities or focus on previously developed land. Establishing residential development boundaries without criteria could also lead to many uncertain effects.

### **Options taken forward**

Option 1, provision of development at 500 new houses and 8 hectares of employment land per year was taken forward to the Publication document along with the development strategy of development focused on the County Town of Stafford, the market town of Stone and either one or more of the key service villages.

In terms of affordable housing, a combination of option 7 and 8 was taken forward as the policy in the Publication document.

A combination of option 9 and 10 was taken forward as the mechanism for setting criteria for new development along with establishing settlement boundaries.

All options were identified as the preferred option in the the Sustainability Appraisal.

### **Suggested Strategy Alternatives**

During the consultation on the Strategic Policy Choices between May and July 2012 several responses were received seeking for the Development Strategy to refer to the The West Midlands Regional Spatial Strategy (WMRSS) Panel Report figure of 11,000 new homes over the plan period. This would equate to 550 dwellings per year. Although Regional Strategies are to be revoked, the National Planning Policy Framework states importantly that the evidence base for Regional Strategies are still to be taken into account by Local Planning Authorities and an appraisal of this strategy is below:



## vi Appraisal of Alternative Strategy

Alternative Strategy - 550 dwellings per annum		Effects over time			Comments
SA Obj	Indicators	Short	medium	long	
1	Employment rate	√	√	√	Assumes strategy contains development land provision of 8 hectares a year
2	Employment land	√	√	√	Assumes strategy contains development land provision of 8 hectares a year
3	Vacant units	√	√	x	This option could lead to an increase of vacant units in the longer term. It is likely that development of this scale will result in more greenfield development
4	Farm diversification, affordable housing	√	√	√	Higher level of development to rural area assuming additional development is in line with settlement hierarchy
5	Developments contrary to EA advice, flood zone	0	0	x	Depending on location of development, the level of development in this option could result in development in the floodplain. Several location options considered as part of the development strategy have flooding issues
6	Affordable housing	√√	√√	√√	Higher level of affordable housing delivered
7	Public transport access, services	?	?	?	Depends on location of development and implementation development
8	Crime	?	?	?	
9	Noise and light impacts	0	x	x	This level of development is much higher than the average level of development over the last 10 years and over the plan period could lead to significant noise and light impacts as well as possible impact on sensitive areas
10	Natural greenspace	?	?	?	Depends on implementation and location of development. It is likely that development of this scale will result in more greenfield development
11	Renewable & low carbon development	x	x	x	Development of this scale will lead to an increase in greenhouse gas emissions, carbon dioxide and an increase in consumption of materials without suitable policies and strategies in place.
12	SSSI quality, impact on species, networks	?/x	?/x	?/x	Depends on implementation. However a greater level of development could impact on ecological networks
13	PDL	?	x	xx	As PDL is used up there will be significant loss of greenfield land for this level of development
14	River quality, run off	?/x	?/x	?/x	Without suitable policies in place to deal with water resource use, disposal and run-off, increased development could have a negative impact
15	Buildings at risk	x	x	xx	Development at this scale does not have a precedent in the Borough and would lead to significant change of the character of towns, villages and landscape

vi Appraisal of Alternative Strategy

Alternative Strategy - 550 dwellings per annum				
16	Household change	✓	✓	Would lead to less people moving or working outside the Borough. However this level of development is above that determined by household projections and there is the danger that over provision will lead to more people moving to the area from neighbouring settlements outside of the Borough which could undermine regeneration aims
17	Attitude to area	✓	0	This level of development could have an impact on attitude to the area due to increase in construction activity and potential infrastructure pressures along with perceived over supply of development which does not meet local needs
18	Compliance with SCI, public engagement	?	?	Depends on implementation of strategy and community involvement
19	Voluntary organisations	0	0	
20	Wellbeing	?	?	Uncertain whether increased development would lead to increased or decreased well being
<p>This option performs better when compared against a higher figure of 750 dwellings per year and performs better in terms of providing employment and meeting affordable housing needs when compared to a lower figure of 250 dwellings per year. Overall the level is higher than that set out in household projections and there is the risk that in the longer term there would be a rise of vacant buildings, loss of greenfield land and additional pressure on resources and infrastructure along with cumulative impact on noise and light impacts, landscape and the character of towns and villages.</p>				

## v Habitat Regulations Assessment

### Habitat Regulations Assessment

Stafford Borough Council, in partnership with Cannock Chase District Council, South Staffordshire District Council and Lichfield District Council have carried out the first stage of the Habitat Regulations Assessment process, the screening report, in relation to possible impacts on Cannock Chase Special Area of Conservation (SAC). The report stated that it is not certain at this stage to confirm, that the individual authorities plans, in combination with other plans and projects will not have a negative impact on the Cannock Chase SAC. In particular, the following possible negative impacts were identified:

- Air quality
- Recreational pressure
- Water quality

A more detailed assessment, looking at these possible impacts and mitigation measures is currently being progressed and the outcome is reported separately alongside The Plan for Stafford Borough - Publication document.

A separate Habitat Regulations Assessment report investigating possible impacts on the following Natura 2000 sites has been completed:

- Chartley Moss SAC
- Pasturefields Salt Marsh SAC
- Cop Mere Ramsar
- Aqualate Mere Ramsar
- Motte Meadows SAC

The report concludes that there will be no significant impacts on the Natura 2000 sites listed from The Plan for Stafford Borough - Publication, in combination with other plans, policies and programmes. The report will be consulted upon alongside this Revised Sustainability Appraisal Report.





## vi List of consultees

The following organisations and individuals responded to the Sustainability Appraisal Scoping Report:

- Sport across Staffordshire and Stoke-on-Trent
- Mr Tim Midgeley
- Advantage West Midlands
- Local Agenda 21, Stafford Borough Council
- Natural England
- Environment Agency
- Stafford Gospel Hall Trust
- English Heritage

The following organisations and individuals responded to the Sustainability Appraisal Commentary Volume 1:

- English Heritage
- Mr James Eld
- Centro - WMPTA
- Government Office for the West Midlands
- CAMRA
- The Environment Agency

The following organisations and individuals responded to the Sustainability Appraisal Commentary Volume 2:

- Environment Agency
- Mrs Lindsay von Elbing
- Stuart Mellenchip
- Eccleshall Parish Council
- Mrs Alison Vaughan
- Evans, Stott & Boote Families, c/o First City Ltd
- B B Apps
- Ms Amanda Margetson

The following organisations and individuals responded to the Sustainability Appraisal Report:

- Environment Agency
- Natural England

The following organisations and individuals responded to the Sustainability Appraisal accompanying the Strategic Policy Choices:

- Environment Agency
- Cllr George Meddings
- Mr Francis Biard
- Mr David Turner
- Mrs Vanessa Darlington
- Mr and Mrs Bramall
- Tina Thatcher
- Mrs Angela Murphy
- Mr Michael Smith
- Mr C J Leather
- Mr Mike Tweed
- Natural England

Details of the responses to SA documents can be found on the [consultation homepage](#)



## vii SA Comments

### vii.1 Sustainability Appraisal Scoping Report

#### General Comments

The Environmental/ Sustainability Report should: Describe mitigation measures to prevent, reduce or offset significant adverse effects, and also recommendations for improving beneficial effects. These, together with other key recommendations for the modification of a plan or programme, should be clearly set out in the main body of the Environmental Report and in the Non-Technical Summary.

<p><b>General Comments</b> <b>English Heritage</b></p>	<p>They should not be confined to appendices;</p> <ul style="list-style-type: none"> <li>• Indicate the likely effectiveness of the mitigation measures.</li> <li>• Identify strategic mitigation rather than being too detailed and overly prescriptive, but vague, generalised statements should be avoided. The level of specificity in terms of mitigation will depend on the level of the plan being assessed, e.g. for an Area Action Plan it might be appropriate for the report to propose quite detailed mitigation proposals to offset any adverse impacts that cannot be avoided or to promote measures that would benefit the historic environment;</li> <li>• Consider the need for exceptional measures;</li> <li>• Consider remote compensation. This option is rarely appropriate for the historic environment because of its site specific and infinite nature. If it can be achieved, it should only be employed as a last resort.</li> <li>• Cascade requirements to projects, where relevant. Mitigation measures should be picked up in EIA for qualifying projects and be incorporated into design/ planning briefs.</li> <li>• Identify responsibility for, commitment to and mechanisms for delivering mitigation. This should be an integral part of the monitoring process. The Environmental/Sustainability Report should also:</li> <li>• Record how the plan changes in response to the SEA/SA;</li> <li>• Clearly identify where recommendations of the SEA/SA have not been incorporated in the plan, together with an explanation of why not.</li> </ul> <p>Set out how comments at earlier stages on the treatment of the historic environment in the appraisal process have been taken into account. Examples of possible mitigation measures for the historic environment might include:</p> <ul style="list-style-type: none"> <li>• A change in policy options e.g. housing renewal areas and degree of refurbishment and redevelopment;</li> <li>• Strengthened references to the historic environment in the policy framework, criteria and guidance e.g. addition of a specific historic environment policy, regeneration policies; planning obligations SPD guidance;</li> <li>• Preparation of detailed historic environment policy guidance e.g. SPD, design guides;</li> <li>• Undertaking of detailed historic characterisation studies to inform development;</li> <li>• Historic environment requirements (e.g. archaeological provisions) for project EIAs;</li> <li>• Use of Article 4 Directions to protect the character of conservation areas; In very exceptional circumstances the dismantling and reconstruction of a building may be justified (remote compensation), although this is more likely to be identified at the project level. We trust that the above comments will be of help in taking forward the appraisal. We would be happy to discuss any of our recommendations in more detail.</li> </ul> <p>Finally, we should like to stress that this response is based on the information provided by you. To avoid any doubt, this does not reflect our obligation to provide further advice and, potentially, object to specific proposals which may subsequently arise (either as a result of this consultation or in later versions of the plan/guidance) where we consider that, despite the SA/SEA, these would have an adverse effect upon the environment.</p>
<p>Change made to Sustainability Appraisal documents</p>	<p>Noted - information will be used when appraising more detailed locations and sites against the SA framework.</p>

<p><b>General Comments</b> <b>English Heritage</b></p>	<p>Overall the Scoping Report provides a clear explanation of the appraisal process, the work carried out to date, and planned future work. The linkages between the main body of the text and appendices are clear, and the relationship between each stage in the appraisal process is explained well.</p> <p>Our comments primarily relate to the treatment of the historic environment and our comments on each stage primarily seek to strengthen the consideration of this core topic. The Scoping Report is titled in a general way to apply to the Local Development Framework. English Heritage recommends that Scoping Reports are tailored to the type, purpose, and level of plan under consideration.</p> <p>The tiering of Scoping Reports, through the use of an overarching report and this subsequently fine tuned for particular documents, can help to reduce repetition and give a better focus to the appraisal framework. In the case of the current consultation the tailoring of subsequent Scoping Reports is likely to be necessary to reflect the respective Local Development Document. Applicable to all stages of the appraisal process the historic environment must be broadly defined - all designated historic assets should be considered together with potential impacts on non-designated features of local historic or architectural interest and value since these can make an important contribution to creating a sense of place, local identity and distinctiveness in both rural and urban areas. Statutory designations include Listed Buildings, Scheduled Monuments plus other nationally important archaeological sites, Registered Historic Parks and Gardens, Registered Battlefields, Conservation Areas, and the settings of all these assets. Other important elements of the historic environment, which are often without any statutory protection, include other archaeological remains, locally listed buildings, parks and gardens, landscape and townscape features, the historic character of wider the landscape / townscape, as well as the potential for as yet unrecorded archaeology.</p> <p>English Heritage strongly advises that the conservation and archaeological staff of the Council and County Council are closely involved throughout the preparation of local development documents and their associated appraisal process. They are best placed to advise on: local historic environment issues and priorities, including access to data held in the Historic Environment Record (formerly Sites and Monuments Record); how policies and proposals can be tailored to minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of historic assets.</p>
<p>Change made to Sustainability Appraisal documents</p>	<p>Noted. The Historic Environment section in the technical appendices as been widened to include more information and also cross-reference to the evidence base work currently being undertaken.</p>
<p><b>Non-technical Summary</b></p>	
<p><b>LA21</b></p>	<p>Issues, Problems, Opportunities are all lumped together - not sure which is which and it will vary depending on our standpoint. Later in the document you only refer to Issues and Opportunities' anyway so it is a bit inconsistent. Regarding sustainability issues the level high levels of deprivation are relative - they are high for Stafford. Also the term 'loss of biodiversity habitats' is odd. Loss of biodiversity is correct - or loss of habitat. The first term ties in with current language.</p>
<p>Change made to Sustainability Appraisal documents</p>	<p>The reference to 'opportunities' to be removed. Key sustainability issue to read 'Loss of biodiversity' rather than loss of biodiversity habitats.</p>

<p><b>General Comments</b></p> <p><b>LA21</b></p>	<p>You now refer to an additional subheading 'community' - i.e. environment, economy, social and community, rather than environment, social and economic. Why? And what is the difference between social and Community here? Need to refer to other key areas with regard to resources, not just soil but clean air and other resources i.e. minerals. In Sustainability Objectives - use of the statutory duty words i.e. 'conserve, restore and enhance' biodiversity. In point 5, do you need to include 'where necessary'?</p>
<p>Change made to Sustainability Appraisal documents</p>	<p>Noted. Additional community objectives have been added as a result of the Community Strategy.</p>
<p><b>Question SA1 - What do you think the plan objectives for the LDF should be?</b></p>	<p>We are not clear what you are seeking comment on. The LDF should meet the objective set out in para 1.6 with respect to the SEA Directive. Overall there should be a net improvement in the quality of the built and natural environment as a result of LDF.</p>
<p><b>Natural England</b></p>	<p>Noted</p>
<p>Change made to Sustainability Appraisal documents</p>	<p>Noted</p>
<p><b>Environment Agency</b></p>	<p>The Environment Agency's aim is to create a better place for people and wildlife, for present and for future generations. We want a better quality of life for people and an enhanced environment for wildlife. This means we need to protect and improve the environment by providing: Cleaner air for everyone; Improved and protected inland and coastal waters; Restored, protected land with healthy soils. To do this, we also need to make some major changes and help everybody achieve: A greener business world; Wiser sustainable use of natural resources. And we need to manage two very real risks by: Limiting and adapting to climate change; and Reducing flood risk.</p>
<p>Change made to Sustainability Appraisal documents</p>	<p>Noted</p>
<p><b>Stafford Gospel Hall Trust</b></p>	<p>Having due regard to national objectives and the Regional Spatial Strategy objectives, we suggest the following plan objectives for Stafford LDF:</p> <ul style="list-style-type: none"> <li>a. to ensure that Stafford continues to fulfil its regional role as a strategic centre, where people wish to live, work and invest;</li> <li>b. to support the regeneration of the local rural economy and communities;</li> <li>c. to ensure that the Borough as a whole reaches and maintains its full potential economic activity, whilst meeting its social, community and environmental obligations, including reduced social exclusion and conservation of environmental assets and enhancement of biodiversity.</li> <li>d. to support and enhance local and regional transport within the Borough;</li> <li>e. to create truly sustainable communities with provision for the planned levels of new housing, in attractive, well-designed, adaptable, safe and secure developments supported by a full range of services and social infrastructure.</li> </ul>
<p>Change made to Sustainability Appraisal documents</p>	<p>Noted. Responses taken into consideration in the Core Strategy process.</p>

<p><b>General Comments</b></p> <p><b>English Heritage</b></p>	<p>From the outline at paragraph 3.1 the Local Development Framework will comprise three different Development Plan Documents. The purpose of Question 1 is unclear, since each DPD could have varying objectives. Moreover, for the Core Strategy the Spatial Objectives should flow from the Vision and help shape the Spatial Strategy, and finally be reflected in the policy framework.</p>
<p>Change made to Sustainability Appraisal documents</p>	<p>Noted</p>
<p><b>Question SA2 - Do you have any suggestions for other plans, policies or programmes to be considered through the Sustainability Appraisal process?</b></p>	<p>Sport Across Staffordshire and Stoke - on - Trent Business plan 2006 – 2009</p>
<p><b>Sport Across Staffordshire and Stoke - on - Trent</b></p>	<p>' Increasingly Active, Healthy and Successful communities'</p>
<p>Change made to Sustainability Appraisal documents</p>	<p>Added to the list of PPP's and examined for technical appendices.</p>
<p><b>LA21</b></p>	<p>Add NERC, 2006</p>
<p>Change made to Sustainability Appraisal documents</p>	<p>Added NERC, 2006 and also to technical appendices.</p>
<p><b>Natural England</b></p>	<p>The NERC Act 2006 should be added. It places a new legal duty on the Council to in developing the LDF, have regard for the need to conserve biodiversity. We would also advise that the West Midlands Prospectus for Green Infrastructure prepared by WMIRA should be included as a reference. In early January 2008 a GOWM endorsed a document known as a Prospectus for Landscapes for Living in the West Midlands will include a biodiversity opportunity map for the region. If possible this should be referenced as it will provide vital guidance on biodiversity enhancement. For more information contact Robert Duff, Natural England.</p>
<p>Change made to Sustainability Appraisal documents</p>	<p>NERC 2006, West Midlands Prospectus for Green Infrastructure, Prospectus for Landscapes for Living in the West Midlands referenced in the list of ppp's and technical appendices.</p>
<p>The Environment Agency has a number of plans, which the SA should take into account. The incorporation of these plans into the LDF process will aid their implementation, and help ensure that the LDF is as environmentally sustainable as possible. The following should therefore be taken into account: Stafford Strategic Flood Risk Assessment (SFRA).</p>	



## General Comments

### The Environment Agency

It is acknowledged that the first phase of this Halcrow report is currently only in draft format, however as it develops it should inform the decision-making process, informing Site Allocations and Development Control Policies regarding flood risk specific to your borough.

**Trent Catchment Flood Management Plan (CFMP) Catchment Flood Management Plans** are documents, which help us to understand the factors that contribute to Flood Risk within a catchment, such as how the land is used, and to recommend the best ways of managing the risk of flooding within the catchment over the next 50 to 100 years. This document can be used in conjunction with the SFRA that is currently being undertaken for the borough, and may be able to help inform flood risk policies in a location-specific way. Stafford Borough falls within the River Trent CFMP, which is currently being developed. It is a study that considers flooding over an area covering the River Trent catchment and all of its tributaries, which is a total area of over 10,000 square kilometres. The Trent and its tributaries will be assessed as a series of sub-catchments and we will investigate ways of managing their flood risk long term in an environmentally sustainable way. We will produce policies that take into consideration the existing conditions across the area, as well as potential future changes to conditions in the catchment such as: climate change; changes to the way land is used; changes to the rural landscape and the way agricultural land is managed; increased pressure from urban development. All of these changes could have effects on flood risk in the sub-catchments.

**Staffordshire Trent Valley Catchment Abstraction Management Strategy (CAMS).** The Environment Agency is responsible for managing water resources in England and Wales. One of the ways that this is done is through licensing water abstraction. We developed Catchment Abstraction Management Strategies (CAMS): to inform the public on water resources and licensing practice; to provide a consistent approach to local water resources management; to help to balance the needs of water users and the environment; to involve the public in managing the water resources in their area. Stafford borough is part of the Staffordshire Trent Valley CAMS which was completed in July 2007. The groundwater units which form the structure of CAMS can be relatively large, and therefore will not be able to provide detailed information regarding water resources at specific locations within the borough. It will however, outline the general water resources policy and availability for the area, and as such is relevant to the LDF.

These three Plans link to Sustainability Objective 14.

**Groundwater Protection: Policy and Practice** The Environment Agency is the statutory body responsible for the protection and management of groundwater resources in England & Wales.

We have set out a framework for our regulation and management of this precious resource in a set of documents, collectively known as **Groundwater Protection: Policy and Practice (GP3)**. In these we describe our aims and objectives for groundwater, our technical approach to its management and protection, the tools we use to do our work and our policies and approach to the application of legislation.

**Staffordshire Washlands Partnership - Farming Floodplains For The Future** The Staffordshire Washlands Working Group was set-up in May 2003 with representatives from the following organisations: Staffordshire Wildlife Trust, Environment Agency, Natural England, RSPB, On Trent, FWAG, DEFRA and West Midlands Bird Club. Multi-functional wet washlands are promoted through the initiative. Emphasis is placed on sustainable flood defence (retention and attenuation), integrated catchment management, biodiversity gain, water quality, water supply, access and economic benefits. The Plan is focused on the delivery of key wetland habitats outlined in the Staffordshire Biodiversity Action Plan (SBAP) targets for lowland wet grassland, reedbeds, rivers & streams and open water. The prime delivery mechanism is the promotion of agri-environment schemes in co-operation with Environment Agency's flood defence, biodiversity, water resources and fisheries departments. The target to re-create/create 80 hectares of wet grassland by 2010 (page 19) refers directly to this initiative.

## General Comments

	<p><b>Environment Agency Policy Regarding Culverts (March 1999).</b> This leaflet sets out Environment Agency policy on culverts. This approach is recommended for other drainage authorities in England and Wales, and it is intended to act as guidance to developers and landowners. It should influence your choice of Site Allocations and could act as a basis for a Development Control Policy regarding the naturalisation of watercourses.</p> <p><b>A Better Place to Play Environment Agency Strategy for Water-related Sport and Recreation (2006-2011)</b> The Environment Agency have a statutory duty to promote recreation on or near inland and coastal waters, make the best use of the sites we own for recreation and access and take amenity and access into consideration in all of our work. We are the Navigation Authority for a number of waterways, and also have specific guidance in relation to the value of angling. This national strategy document outlines how working in effective partnerships we can increase participation, help governments achieve their targets, and maximise the economic, social and environmental benefits of water-related recreation. This links with Sustainability Objective 10.</p> <p><b>Soil: A Precious Resource</b> This is the Environment Agency's soil strategy plan. It outlines the way the Environment Agency will protect, restore and manage soils, including action on climate change, flood risk management, sustainable development and agriculture. There are action points in the plan that may be relevant to the LDF process. This links with Sustainability Objective 13. The Environment Agency also directs you towards the guidance documents</p> <p><b>Water Services Infrastructure Guide and Environmental Quality in Spatial Planning (June 2005)</b> which may be of use to your Authority whilst preparing this plan.</p>
Change made to Sustainability Appraisal documents	Documents added to list of ppp's and looked at for the Technical Appendices.
	Yes, we suggest the following:

<p><b>General Comments</b>  <b>Stafford Gospel Hall Trust</b></p> <p>National PPPs</p> <ol style="list-style-type: none"> <li>1. Confident Communities in a Secure Britain: The Home Office Strategic Plan 2004-08: Home Office (2004)</li> <li>2. Safer Places: The planning system and crime prevention: ODPM/Home Office (2004)</li> <li>3. Sustainable Communities: Homes for All: ODPM (2005)</li> <li>4. Strong and Prosperous Communities: Local Government White Paper: DCLG (2006)</li> <li>5. Healthy Sustainable Communities: bca/nhs: (2004)</li> <li>6. Diversity and Equality in Planning - A good practice guide - ODPM (2005)</li> <li>7. Faith and Community: a good practice guide for local authorities: lga (2002)</li> <li>8. community cohesion - an action guide: lga (2004)</li> </ol> <p>Regional PPPs 1. RSS Phase 2 Revision: Preferred Option: WMRA (2007)</p>	<p>Added to list of ppps and looked at as part of the review of ppp's in the technical appendices.</p>
<p>Change made to Sustainability Appraisal documents</p>	

## General Comments

### English Heritage

We have several suggested additions to Section 4 and Appendix 1, which are detailed below. International add: European Landscape Convention, which the UK Government has signed and ratified. The European Landscape Convention aims to encourage public authorities to adopt policies and measures at local, regional, national and international level for protecting, managing and planning landscapes throughout Europe. Landscape is defined as an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors. The Convention applies this definition to all parts of a country's territory, urban as well as rural areas, to both outstanding and ordinary landscapes, to degraded as well as well-preserved places. It hence adopts a holistic approach to the landscape rather than focusing on special areas. The Conventions definition of landscape and its emphasis on action/interaction, human factors and cultural perspectives is well reflected in English Heritage national programme of Historic Landscape Characterisation.

<http://www.defra.gov.uk/WILDLIFE-COUNTRYSIDE/issues/landscap/index.htm>

<http://conventions.coe.int/Treaty/en/Treaties/Html/176.htm>

National add: The Governments statement on the historic environment The Historic Environment: A Force for our Future published by DCMS in 2001.

Heritage Protection White Paper (March 2007). A summary of its main provisions is given at: <http://www.helm.org.uk/server/show/nav.11237>

Regional Add: · West Midlands Green Infrastructure Prospectus.

West Midlands Regional Implementation Plan

Note that the Regional Cultural Strategy is due to be reviewed and updated.

The West Midlands Regional Historic Environment Forum is also in the process of developing a Regional Historic Environment Strategy. This is still at a very early stage and unlikely to be completed until the end of 2009. Local:

For subsidiary Scoping Reports it may be relevant to include relevant Conservation Area Appraisals and Management Plans. Whilst we generally welcome the inclusion of a supporting analysis for the plan review, we consider that the format and content of the table given in Appendix 1 is not particularly helpful and could be significantly improved. There is no analysis of implications for the plan (the three DPDs forming the LDF?), whilst the analysis of implications for the sustainability appraisal relies on general statements rather than any specific consideration of the implications of the respective document for the SEA/SA objectives.

Of particular concern is the analysis of historic environment aspects (under objective 15) which is poor and inadequate. The outline of PPG15 under the first two columns is confused, implications for the plan and sustainability appraisal are not drawn out (i.e the primary issue should be protecting and enhancing the historic environment), and no consideration is given to other key documents such as PPG16, Force for our Future etc, and other local documents listed in Section 4 (e.g. Draft Heritage Strategy, Historic Landscape Characterisation).

Moreover, the review of the Stafford Economic Development Strategy focuses on nature conservation “ why is this here and not under objective 12? This latter issue reinforces our later comments on the scope and content of objective 15. In addition to the plans/programmes/policies highlighted above that directly relate to the historic environment we also wish to highlight the following links to the historic environment in other relevant PPS/PPGs.

This is relevant in terms of the derivation of sustainability objectives and the recommended improvements to the analysis:

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<p><b>General Comments</b></p>	<p>PPS 1: Delivering Sustainable Development - reference to protecting and enhancing the historic environment and the quality and character of the countryside, [Paragraph 5; ensuring high quality design [Paragraph 5]; a high level of protection to the most valued townscapes and landscapes [Paragraph 17]; enhance as well as protect the historic environment and landscape and townscape character [Paragraph 27(x)]; promotion of design which is appropriate for its context [Paragraph 34-5]; reinforcement of local distinctiveness [Paragraph 38]</p> <p>PPS 3 Housing: the importance of respecting local character (paras. 48-49).</p> <p>PPS 7: Sustainable Development in Rural Areas - paragraphs 12, 15, 16, 17 and 34 are of particular relevance to the historic environment. PPS7 recognises that many country towns and villages are of considerable historic and architectural value. The document seeks a commitment to good design that makes an important contribution to local identity and regional diversity. It supports the re-use of existing buildings in the countryside where this would meet sustainable development objectives and the need to preserve buildings of historic or architectural importance. It identifies that the historic environment has a role in the economics of the region through tourism and leisure.</p> <p>PPS 22: Renewable Energy [Paragraph. 9 (World Heritage Sites); Paragraph 11 (other nationally-designated areas)]</p>
<p>Change made to Sustainability Appraisal documents</p>	<p>Documents added and looked at as part of assessing ppp's for the technical appendices.</p>



## General Comments

### English Heritage

We recommend that there is a clear commitment to keep under review the data sources during subsequent stages of the appraisal. We also recommend that the reporting process clearly identifies gaps in the baseline data and includes a commitment to consider how these can be addressed as part of the appraisal process for current and future Local Development Documents. Other general advice includes the use of both quantitative and qualitative information as part of the baseline description, and ensuring that information is tailored to the scale, type and topic of the LDD under consideration. Our detailed comments below principally relate to Appendix B. As a general comment we welcome the use of a narrative approach rather than endless streams of numeric data. Notwithstanding the useful format of the Appendix, we have a number of concerns regarding the adequacy of the scope and content of the data included for the historic environment.

As underlined in our general comments, in establishing the baseline the historic environment should be broadly interpreted encompassing: all designated historic assets; non designated features of local historic interest; the character of the wider landscape and townscape; and the potential for as yet unrecorded archaeological interest.

In Appendix B, paragraphs 20.4 and 20.5 only provide a very simplistic overview of the Boroughs historic resource and fail to draw on and interpret the tabulated data. We recommend that the scope and content of the text is reviewed with input from the Boroughs conservation officer and County Council archaeologist. We also offer the following recommendations on the scope of the data that must be taken into account and collated to help ensure a robust consideration of the Boroughs historic environment resource. As a general and overarching comment, we strongly recommend that the historic environment is dealt with as a separate and distinct topic to landscape. This was a key point made in our comments on the first LDF round, and it is disappointing and of concern that cultural heritage and landscape are again being treated together. It is our view, based on practical experience, that this approach will not provide a robust consideration of either topic and hence the Council is at risk of failing to meeting the requirements of the SEA Directive and indeed reflect a growing body of practice that has developed in recent years. Overall, the preferred terminology of English Heritage is the historic environment and historic assets since these more accurately reflect the broad scope of the historic environment. The data in Appendix B (p82/3) focuses primarily on a limited range of designated historic assets. This fails to adequately reflect the historic environment resource of the Borough and adjoining Districts. For up-to-date information on designated historic assets the 2007 Heritage Counts Report ([www.heritagecounts.org.uk](http://www.heritagecounts.org.uk)) includes a web-based summary of core data sets by local authority area for the West Midlands.

The broad category of archaeological sites is used, but lacks any descriptive interpretation can the list of 1166 entries be broken down into any broad themes. Is it correct that there are no Scheduled Monuments located in the Borough? [\*Note also that consideration must be given other nationally important archaeological remains - since not all are scheduled.] Important historic gardens are referenced are these Registered Parks and Gardens (i.e. on the national register)? If so they should be referred to as such, and details given including Grade. Any parks and gardens of local historic interest (e.g. on a local list) should also be noted. For all designated assets, setting issues are also relevant to the baseline.

The designated site data in Heritage Counts must be supplemented by further information on the non-designated historic resource. This is a major omission in the data presented in the draft Scoping Report. We strongly recommend that this is addressed and relevant data given on, for example, local list buildings and other features, local list parks and gardens.

Listed Buildings and proportion at Risk at this entry should be updated and reflect the latest position. The 2007 national Buildings at Risk Register was published in the summer with updated figures for Grade I and II\* listed buildings (and structural Scheduled Monuments). Grade II listed buildings are not currently monitored under the national register.

However, Grade II buildings form the vast majority of the listed resource, and an up-to-date at risk register for them may be an information

## General Comments

gap and should hence be highlighted as part of the baseline (i.e. as a problem/constraint). Any available at risk data for unlisted buildings of local historic / architectural interest should also be used. Comparisons to all previous years BAR Registers (national or local) should be undertaken to inform the trend review. In Table 5.1 in the main report, the limitations of this indicator should be noted i.e. the national register only covers Grade I and II\* buildings not the vast majority of the Borough Grade II listed buildings. We comment further on the adequacy of Buildings at Risk as an indicator for the appraisal framework under Section 7. The year English Heritage completed a Scheduled Monuments at Risk survey for the region, the results of which have been made available to the County Councils Historic Environment Record. Preliminary results of the survey are available via the Heritage Counts website (2006 data sheet), but more detailed results for Staffordshire are available and should be highlighted in the baseline.

The potential for as yet unrecorded archaeological interest should also be highlighted. Again this should be highlighted as a problem/constraint under the · Conservation areas as with the more detailed approach taken for biodiversity the conservation areas should be listed with an accompanying information on the preparation of appraisals (how up to date) and published management plans (as per the former BVPI). In conjunction with the quantified data on conservation areas and management plans, consideration should also be given to including qualitative data on the condition and or pressures for change that these areas are typically subject to. Discussions with the Boroughs conservation officer should inform this.

The baseline data given in the Appendix issue is predominantly site specific and consideration should also be given to the historic character of landscapes and townscapes beyond the conservation areas already mentioned. It is not easy to represent the historic environment spatially in a holistic way. Point data alone from individual designations do not provide an adequate overview [again this is a relevant problem/constraint which should be highlighted in the baseline summary]. Historic landscape characterisation and urban characterisation can supplement individual site designations, broadening the understanding of the historic environment by describing the evolution of the present day landscape / townscape and identifying its surviving historic character. Through this process, an understanding about what gives a place its distinctive character and sense of place can be gained and provide the basis for evaluating the sensitivity of the landscape and its capacity for accommodating development and change.

Data is available from the county/unitary Historic Landscape Characterisation projects, Extensive Urban Surveys (about to be commissioned for Staffordshire by the County Council) and other urban characterisation projects. In the case of Staffordshire, the County Council has completed a county wide historic landscape characterisation (HLC) (contact: Debbie Langley) and should be contacted for further information on the availability of data for the Borough area. [This information set has been previously highlighted in our comments on the first LDF Scoping Report, and indeed at our subsequent meeting regarding the recommencement of the LDF process].

Further to the above comment we wish to draw your attention to a piece of work Shropshire County Council is undertaking, part funded by English Heritage, in using the county HLC to determine the sensitivity and capacity of the urban-rural fringe area surrounding Shrewsbury (another growth point local authority) to accommodate new development and identify green infrastructure opportunities. It is envisaged that this project will provide an approach that can be replicated elsewhere to help inform decisions as to the location, scale and planning of development and indeed its appraisal. The project report is due to be completed this year and will be disseminated to all the County leads on HLC.

For monitoring the character of the Boroughs rural landscapes there is the national initiative Countryside Quality Counts, which also provides some measure of the degree of safeguarding or erosion of historic landscape features.

For the Boroughs urban areas and smaller settlements, conservation area appraisals will describe the historic character of these defined areas. Consideration, however, should also be given to the need for further urban characterisation data for townscape areas outside of



<p><b>General Comments</b></p> <p>conservation areas but under potential development pressure (e.g. suburban areas) or likely to be subject to major change. There are a range of approaches to urban characterisation studies as for example extensive and intensive surveys of historical significance developed in the context of areas of low demand housing (a) and rapid assessments for suburban areas (b). [Information on both approaches is available at <a href="http://www.helm.org.uk">www.helm.org.uk</a>]. We would be happy to discuss further the application of characterisation approaches in the context of the Boroughs position as an area of significant development under the emerging Phase 2 Regional Spatial Strategy.</p> <p>Other relevant baseline data sources include - Parkland loss. As part of the national Heritage Counts report in 2005, data is presented on the loss of historic parkland over the period 1918-1995 the results of which are now available by local authority area in the national and regional summaries for the 2006 edition of heritage counts (on the website).</p> <p>Traditional farm buildings are typically under represented in statutory listings, but represent a fundamental part of an areas rural heritage and equally subject to a range of development pressures. General baseline data on traditional farm buildings is also available in the 2005 national Heritage Count report relating to their condition and levels of conversion (reported by joint character area). Available via the HELM website <a href="http://www.helm.org.uk/server/show/nav.9495">http://www.helm.org.uk/server/show/nav.9495</a></p> <p>a more detailed summary is given for each region by joint character area of their characteristic traditional farm building stock in a series of preliminary regional character statements. Staffordshire County Council, with support from English Heritage, is undertaking a county wide survey of traditional farm buildings which will be completed early in the New Year (contact: Steve Dean, Staffordshire County Council). It is envisaged that this information will be used to help inform the future sustainable management of Countys historic farmsteads.</p> <p>Consideration should also be given to using more qualitative data, as for example resident satisfaction surveys. With respect to the historic environment one of the key indicators of the national Heritage Counts Report is participation in the historic environment, as for example visits to historic sites. In the context of these substantive comments on the baseline data, we strongly recommend that the analysis of the historic environment is reviewed and considered more thoroughly than set out in the draft Report. The recommendations in the following section may help with this in conjunction with discussions with the Councils and County Councils conservation staff.</p>	<p>Change made to Sustainability Appraisal documents</p> <p>Noted. Documents added to the list of ppp's and looked at as part of the assessment of ppp's in the technical appendices.</p> <p><b>Question SA3 - Do you know of any data that is missing or misrepresented in these tables?</b></p> <p><b>Mr Tim Midgley</b></p> <p>Affordable housing; clearly in Stafford is not affordable, according to the Courts the 'so called' affordable housing in the Borough is not as indicated given the numbers of actions against 1st time buyers for repossessions that has increase this year by some 65%. Affordable homes should only be deemed to be so; if the main income multiplied by 3 is the sum that is borrowed, in Stafford no home over £100,000 can be called affordable. Most so called low cost homes are not affordable as several lenders have given 8 to 10 multiples of earnings allowing people to obtain mortgages that they can not sustain the cost of the mortgage with even the smallest rise in interest rates.</p> <p>Noted – no change proposed.</p> <p>Change made to Sustainability Appraisal documents</p>
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<b>General Comments</b>	
<b>Mr Tim Midgley</b>	Special needs housing; the number of homes required is greater than that stated.
Change made to Sustainability Appraisal documents	Added to list of sustainability issues, previously only referred to affordable housing
<b>Mr Tim Midgley</b>	Homelessness From data gathered over 4 x 3 nights in January 07 and 4 x 3 nights in March 07 4 x 3 nights in June 07 4x 3 nights in Sept 07 and 4 x 3 night in Oct 07 it is our belief that the number of homeless families in Stafford exceeds the number stated.  Our research showed that the average homeless families were 410 within the borough in each of the months however Sept and October showed an increase above that for the same period in 2006.
Change made to Sustainability Appraisal documents	Noted. Information put into evidence base folder.
<b>LA21</b>	Could add hectare LNR / population used in the LAA
Change made to Sustainability Appraisal documents	Agreed to add target – awaiting correct figure to put in SA documents from LAA process

<p><b>General Comments</b></p> <p><b>The Environment Agency</b></p>	<p>Around 5 million people, in 2 million properties, live in flood risk areas in England and Wales. The Environment Agency has an important role in warning people about the risk of flooding, and in reducing the likelihood of flooding from rivers and the sea. As such, there should be some baseline information relating to flood risk in the borough to assess current flood risk, and to allow targets to be set.</p> <p>The SFRA should be able to supply data which may be used in this table. DEFRA's High Level Target 5 report can also provide information on instances where despite an Environment Agency flood risk objection, planning permission has been granted. This information is broken down into each LPA area, and is already being collated by your Authority. The target for planning permissions where this has occurred should be zero. Data could also indicate the number of developments which incorporate sustainable drainage techniques into the drainage schemes. This may be undertaken as part of your Annual Monitoring Report. Ambitious targets should be set for this, as the use of SuDS in new developments / redevelopments is a proactive way of managing flood risk within the district, and will reduce the risk of both surface water flooding (from the sewer capacity being breached) and flooding from increased flows in rivers.</p> <p>If designed well, SuDS can also have great amenity and biodiversity gains, and do not necessarily have to tie up large areas of sections of land, as can be utilised in the form of green roofs. SuDS are particularly important for your borough, as the catchment is particularly prone to flooding problems, and it is highly likely that new large-scale development within the borough will be focused on greenfield sites (which currently have the lowest run-off rate).</p> <p>The majority of your borough is also of permeable geology, and is of an uncontaminated nature, which is prime for the use of infiltration drainage systems. It is understood that you are considering preparing a Water Cycle Study. It is strongly recommended that such a study forms part of the baseline data for your LDF process, in order to ensure there are sufficient water and sewerage resources and infrastructure for the projected growth over the lifespan of the plan.</p> <p>Information referred to in 2006 – 2007 AMR. Will be taken and put in the baseline presented in the SA Report. Reference to setting ambitious targets for SuDS noted, target is for all new developments to incorporate SuDS.</p>
<p><b>Question SA4 - Do you think there are any other sustainability issues or opportunities that need to be considered in the development of the plan?</b></p> <p>Advantage West Midlands</p>	<p>AWM welcome the inclusion of the West Midlands Economic Strategy (WMES) in list of relevant plans along and the cross reference to relevant WMES plans &amp; objectives. The WMES 'Connecting to Success' will be launched 10th December along with the Draft Delivery Framework - the Scoping Report should consider relevant provision of the updated WMES. WMRA has produced a sustainability checklist covering regional specific sustainability and planning issues, emphasising those of higher priority and can also be adapted to reflect locally significant concerns.</p> <p>Added to the list of PPP's and examined for technical appendices.</p>
<p>Change made to Sustainability Appraisal documents</p> <p><b>LA21</b></p>	<p>Add reference to sustainable transport, resource conservation, green belt land (in relation to use of PDL)</p>
<p>Change made to Sustainability Appraisal documents</p>	<p>Noted</p>

<b>General Comments</b>	
<b>Natural England</b>	Climate change and adaptation for it, should be added to the list of sustainability issues and opportunities. As the greatest global, and local environmental issue being faced it needs high and explicit coverage in our view.
Change made to Sustainability Appraisal documents	Added to list of Key Sustainability Issues – Environmental issues
<b>The Environment Agency</b>	<p>In light of the above comments, flood risk in the borough (particularly in Stafford town centre) is a prime environmental issue for your authority. In line with PPS25, the SA should help guide clear policies against developing in the floodplain, and particularly the Functional Floodplain. The Functional Floodplain (i.e. the land with 1 in 20 year probability of flooding) is the land which is required to flood in order to store flood water. Development of land such as this is an increasing problem for your authority, with current developments and redevelopment proposals in the town centre.</p> <p>Please note:- car parking is not considered an appropriate use of Functional Floodplain. Continued development of land such would result in an increase in flood risk to other areas of the town, which are potentially more vulnerable to the effects of flooding. The choice to develop in this land therefore has serious economic impacts, which should not be underestimated. A prime opportunity for Stafford would be the re-naturalisation of areas such as these, by both moving existing development out of this zone, and not granting permission for new development within this zone. These areas should be allowed to flood frequently (as is their natural regime), and can provide many benefits as such areas of land naturally have great biodiversity potential in the form of wetland or semi-wetland habitats. This further links to recreational, amenity and health benefits for the borough, in addition to flood risk and ecological gain.</p>
Change made to Sustainability Appraisal documents	Flood Risk in the Borough (particularly in Stafford town centre) now added as a key social sustainability issue. The results of the SFRA will be referenced in the SA process, when completed.
<b>Stafford Gospel Hall Trust</b>	<p>We support the Sustainability Objectives, including social and community objectives and are surprised that these are not fully reflected in the key social Sustainability Issues and Opportunities. Having due regard to the RSS Phase 2 Preferred Option Policy SR2 we suggest the following additional social Issues and Opportunities:</p> <ul style="list-style-type: none"> <li>• Need to ensure that the spatial requirements of the voluntary sector including faith communities are met in order to support health, education and skills, spiritual, sport and recreation and cultural objectives.</li> </ul>
Change made to Sustainability Appraisal documents	Noted

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### English Heritage

Given that the Scoping Report (Table 6.3) fails to identify any key issues for the historic environment we offer the following advice. Analysis of the baseline information for the historic environment and early consultation with local authority conservation officers and archaeologists who understand local issues and opportunities, and with other key stakeholders and local communities will help identify sustainability issues relating to the historic environment. This underlines the importance of a comprehensive baseline for the historic environment together with LDF community consultation as an effective means of identifying environmental issues and opportunities.

Key issues should address opportunities as well as problems in relation to the historic environment. There is a need to understand the wider contribution of the historic environment to sustainable development and not simply view it as a narrow issue focused on preservation. An option that might be considered may be opportunities offered by heritage-led regeneration, heritage based sustainable tourism, place-making, design of new development to fit with the existing, functional layout of the town etc.

Environmental problems, issues and opportunities affecting the historic environment, and to be addressed in the SEA/SA process may include:

#### Problems

Heritage assets under threat or at risk from neglect or decay

- Areas of significantly degraded landscape / townscape
- Areas where, on current trends, there is likely to be further significant loss or erosion of landscape/ townscape character or quality
- Areas where development has had or is likely to have significant impact (direct and or indirect) upon the historic environment and or peoples enjoyment of it
- Areas where landscape character or quality is being eroded because of changing farming or other land management practices
- Traffic congestion, air quality, noise pollution and other problems affecting the historic environment
- Areas where quality of life, including economic and social well being, is significantly affected by the above environmental problems. Issues
- Environmental capacity issues
- Preserving and enhancing the designated and non-designated historic environment resource · Conserving the industrial/commercial heritage of the area Opportunities
- Using the area's historic environment resource (archaeology, built and industrial heritage) to contribute to local distinctiveness and sense of place and community engagement
- Promoting the innovative reuse of the existing building stock. Improving awareness, involvement, and understanding of, and access to, the areas historic environment
- Heritage-led regeneration opportunities, heritage based tourism, traditional building skills and the wider environmental economy,
- Using the historic environment as an educational resource

Noted

Change made to Sustainability Appraisal documents

**Question SA5 - Do you think any of the sustainability issues and opportunities require further explanation?**



**General Comments**  
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Our comments above on the identification of issues and the baseline should also be taken into account given that the headline objectives and any supporting decision-making questions should have been derived in part from these stage. With regard to the proposed sustainability objectives and draft framework we have the following comments:

Objectives As already mentioned, we do not support the combined approach for cultural heritage and landscape adopted under objective 15. It is our position that a specific objective for the preservation and enhancement of the historic environment will be always be necessary. We also recognise that it may also be appropriate to address historic environment matters under other objectives such as those covering regeneration, tourism, access to services, quality of life, landscape and townscape. A sustainable outcome is better achieved by integration of this issue at all points of discussion. This position is due to be publicly endorsed as part of a web-based set of advice and guidance to be launched early next year, but used to inform this response. With regard to the headline objective for the historic environment, the list below presents a selection of objectives which can be tailored to local authority circumstances and the level and subject of the plan under consideration. These are broad objectives, where a plan or document deals with a particular topic the objectives should be more specific. The list is divided into environmental, social and economic groups and includes objectives which may be applicable to other themes such as landscape and townscape.

Environmental Objectives

- To preserve and enhance sites, features, areas and settings of archaeological, historical and cultural heritage importance.
- To protect, enhance and manage the rich diversity of cultural and built environment and archaeological assets.
- To protect, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening local distinctiveness and sense of place.
- To achieve high quality and sustainable design for buildings, spaces and the public realm sensitive to the locality.
- To minimise waste by reducing demolition activities. Given the format of the current set of proposed objectives under the environment theme an appropriate approach for a headline objective for the historic environment could be: to preserve and enhance the historic environment or alternatively either of the first two suggestions. For a landscape / townscape headline objective the third suggestion would be suitable. Other relevant social and economic objectives relating to the historic environment area:

**Social Objectives**

- To improve and broaden access to, and understanding of, local heritage, historic sites, areas and buildings
  - To provide better opportunities for people to access and understand local heritage and to participate in cultural and leisure activities
- Economic Objectives**
- To identify, assess and incorporate the physical, social, economic and environmental value of the historic environment in the regeneration of (authority/area).
  - To optimise the use of previously developed land, buildings and existing infrastructure
  - To promote heritage based sustainable tourism Decision-Making Criteria

The headline objectives proposed in the sustainability appraisal framework are not supported by any more detailed decision-making criteria. In view of the broad nature of the approach used to define the headline objectives, we feel that this is an omission and it would be useful in later stages of the appraisal process to work up accompanying decision-making criteria. The Government advises that planning authorities may also choose to include more detailed decision-making criteria and related indicators in their SA framework. These detailed decision-making

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criteria can help to ensure that all the key issues to be considered in the SA are incorporated in the appraisal framework. It is important to include separate decision-making criteria for the historic environment, in order that the identification of likely effects upon the historic environment is not masked.

Government guidance, Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents (ODPM 2005) provides one overarching decision-making criterion that relates to the historic environment. Will it protect and enhance sites, features and areas of historical, archaeological and cultural value in both urban and rural areas? To aid the derivation of more appropriate decision-making criteria we offer the following menu of questions to support environmental, social and economic objectives.

We suggest these are reviewed and tailored to expand on the headline objective and reflect the historic environment resource of the Borough.

### Environmental Objectives

- Will it preserve and/or enhance the historic environment or will it protect World Heritage Sites and their setting o will it preserve archaeological remains and their setting
- will it preserve listed buildings and structures and their setting
- will it preserve or enhance the character or appearance of conservation areas and their setting o will it protect Registered Parks and Gardens, Registered Battlefields and their setting o will it conserve locally important buildings and townscapes
- will it conserve distinctive historic landscapes o will it contribute to the better management of heritage assets
- Will it improve the quality of the historic environment
- Will it lead to the improved management and or restoration of a historic asset
- Will it respect, maintain and strengthen local distinctiveness and sense of place
- Will it promote high quality urban design
- Will it provide for increased access to the historic environment Social Objectives
- Will it increase the social benefit (e.g. education, participation, citizenship, health and well-being) derived from the historic environment
- Will it improve the satisfaction of people with their neighbourhoods as places to live
- Will it engage communities in identifying culturally important features and areas
- Will it provide for increased understanding of the historic environment Economic Objectives · Will it increase the economic benefit (e.g. heritage led regeneration, tourism, environmental economy, cultural economy) derived from the historic environment
- Will it promote the environmental economy
- Will it promote heritage-led regeneration
- Will it lead to the repair and restoration of an historic asset
- Will it make the best use of existing buildings and physical infrastructure
- Will it promote heritage based sustainable tourism
- Will it ensure that restoration and repair and maintenance is sympathetic towards the local environment
- Will it support the repair and reuse of historic buildings
- Will the initiative help to reduce the number of vacant buildings through adaptive re-use.

### Indicators

The selection of indicators for the historic environment may vary at different stages of the appraisal process and in relation to the particular



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LDD. State of the environment or contextual indicators can inform the baseline analysis, such as looking at the comparative range, quality and condition of historic assets and identifying possible targets. However, state of the environment indicators may not always be suitable for the appraisal or monitoring the significant effects of a plan. At these stages the priority should be devising indicators which will clearly demonstrate the impact(s) of the plan on the historic environment. Selecting indicators which are directly linked to SEA/SA objectives is a complex process and with respect to the historic environment further exacerbated by the relative lack of consistently monitored data when compared to other topic areas.

Notwithstanding this a robust monitoring framework for the historic environment must be included to meet the requirements of SEA/SA in terms of:

- Identifying any unforeseen adverse effects of implementing the plan and enabling appropriate remedial action to be taken.
- Testing the accuracy of predictions made in the SA and improving future practice.
- Checking the delivery and performance of mitigation measures.
- Determining whether the plan is contributing to the achievement of the objectives and targets for the historic environment.

Collecting information for future LDDs.

In devising historic environment indicators for the appraisal or monitoring of the significant effects of a LDD English Heritage recommends that:

- the indicators relate to the accompanying objectives/sub-objectives (decision-making criteria); · the indicators are appropriate and relevant to the level and subject of the plan under consideration;
- the indicators address positive and negative effects;
- use is made of both qualitative and quantitative data;
- the indicators are kept under review as new data sets become available and or new issues are identified;
- accompanying targets are included. In the proposed sustainability appraisal framework two indicators (with accompanying targets) are identified.

The general thrust of the first (number of developments that adversely affect historic character) is welcomed, but we have concerns over how this is to be monitored in a robust way in view of the potential subjectivity involved in determining the adverse impact and the affect on historic character.

The indicator is not detailed in Appendix 3 and should be with further explanation of its monitoring requirements. A possible alternative approach could be Area of highly sensitive historic landscape characterisation type which has been altered and their character eroded this based on the use of the HLC, but dependent on a sensitively/capacity

type study. The second indicator relies on the number and area (? this is not relevant) of buildings at Risk (although the Appendix refers to Number/% of Listed Buildings and Scheduled Ancient Monuments at Risk). The discrepancies between the main report and Appendix should be clarified. As already mentioned, the National Register collated by English Heritage only covers Grade I and II\* listed buildings (and structural Scheduled Monuments). If an at risk indicator is to be used, it should cover all the listed building resource (i.e. also Grade II) and ideally also include local list buildings at risk (this potentially a data gap requiring the setting up of a local list and accompanying at risk survey).

The existing survey data for Scheduled Monuments at Risk should also be included to reflect the national launch next year of the heritage at

<p><b>General Comments</b></p>	<p>risk programme (encompassing a broader range of designated historic assets listed buildings, schedule monuments, designed landscapes, marine wrecks, places of worship). We also note that no positive effect indicators are proposed.</p> <p>Further to the above comments outlined below is a selection of indicators which could be tailored to the headline objective and decision-making criteria.</p> <ul style="list-style-type: none"> <li>● Number and % of Listed Buildings at Risk (all grades)</li> <li>● Number and % of Scheduled Monuments at Risk</li> <li>● Change in the character or appearance of conservation areas</li> <li>● Number and % of locally listed buildings at risk</li> <li>● % of local authority area covered by historic landscape / urban characterisation studies</li> <li>● Improvements in the management of historic and archaeological sites and features</li> <li>● % of Joint Character Areas showing no change or showing change consistent with character area descriptions</li> <li>● % of planning applications for which archaeological investigations were required prior to approval</li> </ul> <p>Stronger reference made in the technical appendices to the historic environment, in particular work done by Staffordshire County Council; historic landscape characterisation and landscape assessment.</p> <p>'and area' taken out of the indicator referring to number of listed buildings at risk and reference to scheduled ancient monuments at risk also added (so that the indicator in the document and technical appendices is consistent).</p> <p>The suggested indicators 'Number of historic buildings restored and brought back into use' and '% of Borough covered by historic landscape / urban characterisation studies' added.</p>
<p><b>Question SA6 - Do you agree with the targets and indicators?</b> <b>LA21</b></p>	<p>Targets 'to reduce' or 'to increase' seem a bit vague</p>
<p>Change made to Sustainability Appraisal documents</p> <p><b>Natural England</b></p>	<p>Agreed. Targets and indicators amended as a result of other comments and recommendations from Natural England.</p> <p>We support Sustainability Objective 12 and welcome in general the suggested indicators and targets. However the first indicator is too general in our view as every development will in some way or other affect species or habitats. The key consideration having regard for PPS 9 is 'The Number of Developments that may affect features of biodiversity conservation value (includes not exclusively habitats and species of importance in the borough, BAP Species and habitats, legally protected species, veteran trees, ancient woodland, Sites of Biological Importance) Recommended target: Reduce to minimum. Consideration should be given to the inclusion of an indicator relating to sites of geological conservation value in line with the guidance in PPS 9. The last indicator i.e. Number of the developments that protect and enhance sites and spaces important for biodiversity etc has no associated target included. We suggest the target should be to: 'increase'. We welcome and support SO 15 and the inclusion of accessible natural greenspace targets.</p>
<p>Change made to Sustainability Appraisal documents</p>	<p>The following indicator and target have been added</p> <p>Number of developments that may affect biodiversity conservation value</p> <p>Target: Reduce to minimum.</p>

**General Comments**

Number of developments that may affect features of geological conservation value

Target: Reduce to minimum

## General Comments

## Environment Agency

Sustainability Objective 5: It should be noted that water-saving techniques and sustainable drainage systems are linked, but are also two different subjects and perhaps should be treated as such. The use of water-saving techniques within the development does not negate the need for sustainable drainage systems to deal with rainwater on site, as water-saving techniques largely deal with the issue of managed water resources and sustainable drainage deals with the issue of minimising flood risk.

As such, the target should be for both requirements to be incorporated into new developments, and should read as follows:

Target: All new developments to incorporate water saving measures and sustainable drainage techniques.

It is considered that the second target under this objective should only refer to flood risk and not to risk of groundwater pollution.

Flood risk and groundwater pollution are two separate issues and only flood risk is mentioned in the wording of the objective. Groundwater contamination is also not linked to climate change, so may be more appropriate under another objective.

It should also be noted that this target is highly unlikely to be achieved given the existing development that lies within areas liable to flooding and major aquifers within the borough. In addition to separating out the issues within this target, you may wish to reword this to allow for a certain amount of such development, in the spirit of PPS25 (sequential test etc). An alternative target may read as follows: *Target: No planning permissions in the floodplain to be granted contrary to Environment Agency advice.* We do however recognise the value in setting ambitious targets which can act as an incentive throughout the plans lifespan, and would support you if you wished to push for tougher standards on flood risk within your borough than the existing national policy. With regards to the number of potentially contaminative developments located on major aquifers vulnerable to contamination, we suggest a variation on the above target which puts the onus on the Environment Agency to assess the relative risk of the development to groundwater quality, as it may require scientific assessment to ascertain if the risk is acceptable or not.

In light of this, the following wording may be appropriate: *Target: No planning permissions to be granted contrary to the Environment Agency's advice based on the risk of contamination to underlying groundwater.*

This target could be included in either Objective 13 and/or Objective 14 if either were amended to refer to the protection of groundwater quality or Controlled waters (Controlled Waters are defined as: relevant territorial waters, coastal waters, inland waters, and ground waters controlled by the Environment Agency as described in the Water Resources Act 1991).

It is welcomed that the dual aspects of climate change are addressed within separate objectives both to reduce developments vulnerability to impacts of climate change (Objective 5) and to reduce societal contributions to climate change (Objective 11). The inclusion of flood risk and climate change issues within the economic objectives is welcomed, as the link between environmental factors and economics are not always readily acknowledged and catered for. Sustainability Objective 9: The Environment Agency welcomes the inclusion of targets relating the reduction of noise and light pollution, as this can have detrimental impacts on the ecology of the area.

Sustainability Objective 10: The Environment Agency is promoting the opening up of watercourses for recreation purposes, and encourages developments which face onto watercourses, making them a shared public space which will therefore be appreciated and cared for by the community. This will link with the reduction of pollution, improvement in water quality, enhancement of biodiversity in addition to social factors such as safety and health benefits. All new development adjacent to watercourses or open water bodies should encourage accessibility through the development to the watercourse, in order to encourage its use. It is therefore suggested a relevant target is incorporated under this objective regarding the number of waterside developments which improve accessibility and quality of the water environment. This is similar to the target relating to the creation and enhancement of open space, but it is noted that it may not be covered under the Open Space Strategy.

## General Comments

## Sustainability

Objective 11: The Environment Agency welcomes this objective, as it focuses clearly on climate change and what the borough can do to minimise it. Although this partly falls within our remit, however, we are unable to provide baseline data relating to the targets. We recommend that based on current figures, ambitious quantitative targets are set in order to achieve a significant improvement.

Sustainability Target 12: We welcome the inclusion of the protect and enhance theme, as promoted within PPS1 and PP9, and particularly welcome the target relating to Staffordshire BAP, as it should cover all issues within our water-based remit.

Sustainability Target 13: You may wish to incorporate the pollution aspect of Objective 5 into this objective.

Sustainability Objective 14: This objective requires clarification:- To protect and enhance water quality of the Boroughs rivers, whilst maximising their carrying capacity and achieving sustainable water resource management. It should be noted that any objectives, policies or proposals that encourage maximising of rivers carrying capacity through the process or dredging would be strongly opposed on ecological grounds, as it causes severe detrimental effects on water-based habitats and its associated species (and is also in direct conflict with Objective 12). It is assumed however that this objective is just mis-worded, and does not allude to dredging, but to the reduction of surface run-off rates through the use of SuDS, as detailed on page 32.

This Objective should therefore be amended to reflect this. With regards to the targets the Environment Agency's comments are as follows:

Please note the Environment Agency is unable to provide information relating to the water consumption of any individual development, so unless this data is available from an alternative source this target may not be viable.

It may also be difficult to attribute specific pollution events with a particular development; however the Environment Agency will have information regarding successful pollution prosecutions and enforcement action that may be able to be fed into your SA monitoring framework, although it will not be specifically related to new developments. Chemical and biological water quality data is available from the Environment Agency, and in line with the EU Water Framework Directives (WFD) requirements, should always show an improvement in quality. Historic changes in water quality would provide an indication of ambitious but achievable targets for improvement which could be used throughout the plans lifespan.

For the final two targets under this objective, please see comments relating to Sustainability Objective 5.

With regards to the Monitoring Table in Technical Appendix 3, it is commented that targets set should be ambitious, and calculated as a result of any historic monitoring information which may be available. If no information is available, targets should be set higher rather than lower in order to encourage improvement. It is noted that a number of targets within this appendix only consider action to be taken if there is a severe decline, or only if no developments exhibit the features required. This should be amended to ensure that reasonable improvements are achieved during each monitoring period, and if they are not, corrective action is taken. It is noted that this approach has also been taken with the % of river with good biological/chemical records, which states that action will only be taken if there is a significant decline in water quality. This is particularly unacceptable given the requirements of the WFD as addressed above. Finally, it is acknowledged that the SFRA for this borough is not yet complete, however the next draft of the SA should include clear reference to the completed SFRA undertaken for the borough, and demonstrate how the SFRAs conclusions have been taken into account when considering the Core Strategy, Development Control Policies and Site Allocations (in addition to other relevant SPDs). The SA should provide a transparency to the thought-process behind the DPD or SPD, and clearly show how the SFRA has influenced the LDF documents it is appraising, particularly in terms of the sequential test as required by PPS25.



<b>General Comments</b>	<p>The following target added to the objectives, indicators and targets table</p> <p>~Target: All new developments to incorporate water saving measures and sustainable drainage techniques.</p> <p>Contaminated land target moved to SO14 set of indicators.</p> <p><i>Target: No planning permissions to be granted contrary to the Environment Agency's advice based on the risk of contamination to underlying groundwater.</i> Added to SO13 and SO14 set of targets and indicators</p> <p>The monitoring of SO14 as listed in the monitoring table also amended to read 'no reasonable improvements achieved in plan period'.</p> <p>The results of the SFRA will be referenced in the SA process, when completed, and will be used when appraising more detailed site / location options.</p> <p>Yes, we especially support indicator 19 but suggest that the target should be 'increase'. Social cohesion is difficult to measure, but participation in voluntary/community organisations is often taken as a proxy indicator for social cohesion as well as general 'well-being' of the community. We also support objectives/indicators 6, 7, 8, 10, 16 and 17. We submit that these are closely linked. The Home Office Strategic Plan highlights the linkages to the voluntary, community and faith sectors in order to support objectives 8 and 17. These indicators and positive outcomes are hall-marks of a truly sustainable community.</p> <p>Noted. Target amended to 'increase'</p>
<p>Change made to Sustainability Appraisal documents</p> <p><b>Stafford Gospel Hall Trust</b></p>	<p><b>Question SA7 - Do you think any other targets and indicators should be included?</b></p> <p>Local Nature Reserve's could go in.</p>
<p>Change made to Sustainability Appraisal documents</p> <p><b>Natural England</b></p>	<p>Indicator from Staffordshire Local Area Agreement included under Objective 12</p> <p>SO 11, regarding climate change - given the overwhelming scientific evidence regarding climate change and its predicted effects, consideration should be given to much more challenging targets and indicators. These should be quantitative to be meaningful. Vague aspirations to reduce the % of people travelling to work by private car are unlikely to be effective.</p> <p>Target to reduce % of people travelling to work by private car taken out and replaced with indicator relating to proportion of energy supply secured from renewable sources – this is often referred to as 'The Merton Rule' and the Core Strategy should include relevant policy.</p>
<b>Section 11</b>	



## General Comments

### English Heritage

For the next stage of the appraisal process we strongly urge the Council to avoid the over use of tabulated data without any textual analysis and supporting comments. Clear and understandable referencing to the respective sustainability appraisal objective and options should also be ensured (not simply numbering or lettering). We also offer the following general advice on impact identification and predication, significance, evaluation, and mitigation.

Potential significant effects identification and prediction of potential significant effects (positive and negative) on the historic environment can involve the following general categories:

- Loss or damage to any historic asset and/or its setting;
- Conservation and enhancement/ management of any historic asset;
- Loss of or erosion of the historic character of the landscape/townscape;
- Impact on at risk status of assets, as well as wider level of risk to the historic environment; · Impacts in the wider area, such as trans-boundary effects (e.g. traffic generation, setting issues);
- Cumulative impacts on historic assets and places. Cumulative impacts can occur in three different ways, although these are not mutually exclusive: Spatial - accumulation of impacts in different places; Temporal - accumulation of impacts at one location over time; o Simultaneous - accumulation of impacts at one location simultaneously. Significance of impacts When assessing the significance of impacts on the historic environment (and the monitoring of significant effects), including within this architectural and historic townscape and landscape quality, the factors below should be considered.

Given the strategic nature of SEA/SA these are suggested to stimulate discussion rather than setting requirements for rigorous assessment.

- The rarity of historic assets and identified baseline trends;
- The historic environment is an irreplaceable and finite resource and hence, impacts are unlikely to be reversible.
- The critical importance of a thorough understanding of the historic environment and a robust baseline so that significant adverse impacts can be avoided or reduced and potential benefits maximised;
- The inextricable link between the historic and natural environment and the character of the landscape;
- The potential for cumulative impacts: When considering impacts on the historic environment, care must be taken before concluding that impacts on individual heritage sites are not strategically significant. This is because: individual sites can have regional or national significance through scarcity or associations with similar assets, e.g. a particular building type or earthwork, ridge and furrow; cumulative minor impacts on a range of individual sites can become significant; o the effect of small impacts, or loss of features, which are not significant individually may become significant, e.g. loss of character of a conservation area. The accumulation of effects on different environmental assets also need to be considered e.g. the impact on historic assets and on related natural and landscape assets.
- Evaluation The planning process frequently involves complex decisions when evaluating the implications of significant effects. The following principles which are of relevance to the historic environment, as well as other aspects of the environment, are useful when evaluating the impact of different options:
- Choices between conflicting environmental objectives must be justified with priority given to highest quality environmental resource. The precautionary principle may be needed;
- While reconciling socio-economic and environmental objectives is key to plan-making, it should be evident that the best environmental option has been selected unless a clear and well justified reason is provided. Balancing should be restricted to slight or exceptionally moderate impacts;
- Where a chosen option could have significant environmental effects, it should be rigorously tested in comparison with less environmentally harmful options.

<b>General Comments</b>	<p>Recommendations and Mitigation Based on the assessment of significant effects and evaluation of options, the Environmental Report should include recommendations where necessary for modifications to the plan and explain the choice of options. Where the avoidance of harm is not possible, mitigation measures should be identified, appropriate to the level and type of plan being appraised. The primary objective should be the avoidance of harm, with the highest level of protection being afforded to internationally and nationally important historic assets. Damage to other historic assets should be avoided wherever possible, in recognition that such assets are irreplaceable.</p> <p>Unavoidable damage should be minimised and mitigation measures identified for implementation when development proposals come forward. Compensation measures are not usually appropriate, as historic assets cannot be re-created. Consideration should also be given to including mitigation measures for improving beneficial effects for the historic environment. When presenting the results of the assessment in the Environmental Report, seek to avoid generalised statements such as this option could have adverse impacts on historic assets, although it is recognised that it may not be possible to be too specific at the higher strategic level, e.g. RSS. However, even at this level, we expect the report to identify the nature and extent of direct or indirect adverse impacts, e.g. with respect to specific geographical locations/ sub-areas; the asset type or time-related effects.</p>
Change made to Sustainability Appraisal documents	Noted - information will be used when appraising more detailed locations and sites against the SA framework.
<b>Section 13</b>	
<b>LA21</b>	Nice photos, but why are they here, and if they are to stay, why exclude other images / nice pictures?
Change made to Sustainability Appraisal documents	Noted. The photos relate to Natura 2000 sites in the Borough (section related to Habitats Regulations Assessment) Other images will be used where necessary.

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<b>General Comments</b>	<p>SA objective disappointing that still landscape and historic environment</p> <p>All options will also need to consider impacts on the historic environment. This underlines our original recommendations for a discrete SA objective on the historic environment.</p> <p>Further to our comments on the Draft Sustainability Appraisal Report in December 2007, we wish to reiterate the following: It is disappointing that objective 15 still uses a combined approach for landscape and cultural heritage. It is our position that a specific objective for the preservation and enhancement of the historic environment will always be necessary. The current objective is unclear and we again direct you to our recommendations for changes in our letter dated 7 December 2007.</p> <p>In future iterations of the SA it would be helpful if the format of the appraisal tables can be reviewed to make it easier to identify the objectives and options under consideration, and the inclusion of a commentary on the main basis for the assessment score.</p>
<b>Miss A Smith, English Heritage</b>	
Change made to Sustainability Appraisal documents	Detailed decision making criteria have been introduced into the Sustainability Appraisal Commentary Vol2 as a way to better illustrate the appraisal process. Under objective 15, the following questions have been included:

<p><b>General Comments</b></p>	<ul style="list-style-type: none"> <li>• Will it protect and enhance sites features and areas of historical, archaeological and cultural value in both urban and rural areas?</li> <li>• Will it improve the quality and character of landscapes and townscapes?</li> <li>• Will it help to conserve historic buildings through sensitive adaptation and re-use?</li> <li>• Will it lead to the retention and enhancement of listed buildings and/or conservation areas?</li> <li>• Will it lead to reduced pressure on the cultural heritage (e.g. archaeology)?</li> <li>• Will it contribute to a quality built environment?</li> </ul> <p>It is anticipated that this will draw out specific impacts relating to the preservation and enhancement of the historic environment and provided greater depth to the commentary of the basis for the assessment score.</p>
	<p><b>Rural and biodiversity issues</b>                  Stafford is classed as "significantly rural". We would therefore expect rural issues to be reflected, and the LDF to be rural proofed. There's recognition of several issues:</p> <ul style="list-style-type: none"> <li>• Housing</li> </ul>

## General Comments

## Mrs Sarah Hunt, Government Office for the West Midlands

- Employment
- Farm diversification
- Economy & communities
- Facilities in rural centres – but there could be more about access to services – relevant to sustainable communities, and as an environmental issue. This is possibly covered in the recommendations at ii: 10, under "development infrastructure"; but it may need to be spelt out more.
- Use of vacant land for employment (sustainability aspects of this would need to be considered)
- Staffordshire Biodiversity Action Plan
- SSSIs

**Environmental issues**

- Climate change is acknowledged as a key sustainability issue, with several issues listed as objectives, indicators and targets
- Why is biodiversity given as the SEA topic?
- Not very much about reducing carbon dioxide emissions – just the one reference to low-carbon energy
- The Sustainability Appraisal makes no mention of waste. Stafford's output of household waste per person is comparatively high.

**The six development options**

- The document does not profess to talk about these in more than general terms at this stage, and we expect there to be a more detailed assessment in due course
- This should include fuller justification for identifying options 3 and 4 as the most sustainable, including which aspects of sustainability are covered by that statement.

## Change made to Sustainability Appraisal documents

The following are SEA Topics; biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage and landscape.

Objective 5 now falls under the SEA Topics Population, Human Health and Material Assets and 11 falls under SEA Topics Air, Population, Human Health and Climatic Factors.

It is anticipated that with the addition of detailed decision making criteria, there will be more specific reference to access to services, reduction of carbon dioxide emissions and waste. It is also anticipated that using the detailed decision making criteria, a more detailed assessment and commentary can be made, including which aspects of sustainability are covered in the assessment.

Data has been collected from Local Authority Municipal Waste Statistics 2006 / 07 which illustrates the following

- Stafford Borough has the second highest amount of household waste in Staffordshire and the third highest in terms of household waste per head.
- In terms of recycling, whilst 'dry recycling' is the highest in Staffordshire, 'green recycling' is much lower, meaning Stafford Borough has the third lowest rate of recycling and composting in Staffordshire.

This information will be carried forward in subsequent SA reports and flagged up as a sustainability issue.

## General Comments

**Rachel Bell, Centro-WMPA**

Thank you for consulting Centro-WMPA on the Stafford Borough Local Development Framework: Sustainability Appraisal Commentary, which we received on 7th January 2008.

Centro-WMPA have not sought to answer specific questions, but provided comments on the general issues raised by this document. Although outside the metropolitan area, Centro-WMPA are happy to assist in the continued development of this document and provide information and guidance where necessary, particularly as Stafford is within the 'travel to work' area for the West Midlands region. In respect of Centro-WMPA's interest it is encouraging that the Stafford Borough LDF: Sustainability Appraisal Commentary identifies realistic and achievable areas of actions for partners and clearly acknowledges the contribution that public transport can make. Centro-WMPA is committed to improving sustainability by encouraging modal shift to public transport as the preferred mode of travel for business, leisure and pleasure.

Centro-WMPA would also like to emphasise that it is important that there is strong correlation between the objectives of this document and the principles set out in the West Midlands Regional Spatial Strategy (WMRSS) as outlined through Policies T1-T12, the Regional Transport Strategy (RTS). This is especially important in relation to land use planning and reducing the need to travel. The presence of a high quality public transport network provides an attractive alternative to the private car and can therefore contribute to a reduction in road traffic congestion. A high quality public transport network can assist in economic growth and regeneration as well as support housing growth, help tackle congestion, and assist in increasing social inclusion, whilst also ensuring that the West Midlands transport sector contributes to the wider challenges including reducing climate changing emissions. Intense development should therefore be focused in places that are well served by public transport as outlined by the Regional Spatial Strategy Policy T2. Additionally a high quality public transport network can help to ensure that all people, especially those without access to a private car, can access key services such as employment or educational opportunities.

Centro-WMPA would be supportive of actions that clearly promote the role of public transport in achieving sustainability aims. For example, promotion of the following messages: -

- Cross boundary journeys for employment, socially necessary or leisure purposes by public transport.
- A coherent package supporting 'smarter choices' to encourage behavioural change in peoples travel patterns complemented by a high quality public transport system which allows people to make informed choices about which mode they use to travel where and when they need to. Also encouraging developments that generate significant demand on travel to be located near public transport.
- Promoting greater use of and additional spaces at park and ride facilities (including cycle racks)
- Promotion of rail routes to provide better and wider coverage
- Working with bus operators for better fuel-efficient vehicle standards.
- Promotion of public transport and sustainable communities to enable environmental change.

More generally, Centro-WMPA seeks to continually improve its own environmental performance and contribution to sustainable development from all of its activities, infrastructure, products and services, such as influencing operators in using better fuel efficient vehicles and working with a range of national, regional and local organisations to support and encourage behavioural and cultural change to increase in the number of people who use public transport for their journeys.

I would appreciate you keeping me informed on the progress of this document and if you have any further queries, would like any further information, please do not hesitate to contact me.



General Comments	
<p>Change made to Sustainability Appraisal documents</p>	<p>Comments noted.</p> <p>Relevant policies in the RSS and Regional Transport Strategy have been carried forward into the relevant sections in the technical appendices.</p> <p>In addition the following decision making criteria have been included alongside the sustainability objectives.</p> <p>Will it lead to a net reduction in the number of people commuting to work outside the borough?</p> <p>Will it support existing services and facilities?</p> <p>Will it result in new developments being located in areas served by public transport?</p> <p>Will it improve accessibility to key local services?</p> <p>Will it make access easier for those without a car?</p> <p>It is anticipated that this will give a more detailed assessment and commentary on transport and travel to work information.</p>
<p>Jane Field, The Environment Agency</p>	<p>Thank you for referring the above sustainability appraisal in support of your Development Strategy document. This was received via the Limehouse Portal on 4<sup>th</sup> January 2008, and in hard copy format on 7<sup>th</sup> January 2008.</p> <p>We welcome the addition of various plans, programmes and policies, and rewording of targets and indicators as requested in our previous letter of 7<sup>th</sup> December 2007.</p> <p>We recommend however, that the final two indicators and targets relating to Objective 14 are amended in subsequent SAs as they appear to duplicate each other. It is advised that the indicators would better read:</p> <p><i>Indicator:- the number of developments given planning permission contrary to Environment Agency advice based on an unacceptable risk of contamination to 'Controlled Waters'</i></p> <p><b>Target:- None</b></p> <p>Section 104 of the 1991 Water Resources Act defines 'Controlled Waters' as "territorial waters which extend seawards for three miles, coastal waters, inland freshwaters, that is to say, the waters in any relevant lake or pond or of so much of any relevant river or watercourse as is above the freshwater limit, and ground waters, that is to say, any waters contained in underground strata". This therefore encapsulates all the water quality issues for concern.</p>
<p>Change made to Sustainability Appraisal documents</p>	<p>The following 2 indicators and targets have been removed.</p> <p>The number of development given planning permission contrary to EA advice</p>



<p><b>General Comments</b></p>	<p>Target: None</p> <p>Number of developments given planning permission contrary to EA advice</p> <p>Target: No planning permission to be granted contrary to the Environment Agency's advice based on the risk of contamination to underlying groundwater</p> <p>The following has been included</p> <p><i>Indicator:- the number of developments given planning permission contrary to Environment Agency advice based on an unacceptable risk of contamination to 'Controlled Waters'</i></p> <p>Target:- None</p>
<p><b>Sustainability Appraisal Objectives</b></p>	<p>Ensure the maintenance of a viable and productive agricultural system in the borough by minimising the amount of productive agricultural land taken for housing and employment development.</p> <p>In is anticipated that the inclusion of the following detailed decision making criteria will address the issue of loss of productive agricultural land.</p> <ul style="list-style-type: none"> <li>• Will it result in the protection/retention of the Best and Most Versatile agricultural land (Grades 1-3a)?</li> </ul> <p>In terms of sustainability Objective 4 - To support the needs of the local rural economy and community - rural public houses are crucial both to economic and social well-being. This is recognised by many rural planning authorities. Should there be any opportunity to revise the indicators, therefore, an additional indicator - number of community public houses and target - no reduction should be incorporated.</p> <p>In terms of the key sustainability issues given at the end of the section, under social issues - we would argue that 'decline in local community pubs' should be added to the bullet points. As you will be aware, numbers of both urban and rural pubs are now falling. (CAMRA has a database to evidence this should you be interested)</p>
<p>Change made to Sustainability Appraisal documents</p> <p><b>Mr Roderic Hammerton, CAMRA</b></p> <p>Change made to Sustainability Appraisal documents</p>	<p>Comments noted. Loss of public houses to housing is an issue across the country and there are several cases of this in the Borough. It is anticipated that the inclusion of the following detailed decision making criteria will address the issue of loss of local services, including public houses.</p> <ul style="list-style-type: none"> <li>• Will it improve accessibility to key local services?</li> <li>• Will it protect existing key services and facilities?</li> </ul>

<b>General Comments</b>	Loss of local services and facilities has also been flagged up as a key sustainability issue.
<b>Key Question 1 - Do you think broad options and alternatives identified in the table are correct?</b>	
<b>Miss A Smith, English Heritage</b>	The identified options and alternatives are wide ranging, but tend to be based on directly contrasting options rather than more subtle variations. An additional option is building reuse, conversion over new build.
Change made to Sustainability Appraisal documents	Comments notes. Building reuse, conversion over new build has been added as an option in the Mode / Process section of the options table.
<b>Jane Field, The Environment Agency</b>	The Environment Agency considers there are no broad options or alternatives omitted from the SA.
Change made to Sustainability Appraisal documents	Comment noted. No change proposed.
<b>Paragraph 4.4</b>	
<b>Mr James Eld</b>	I consider that the Stafford, Stone and Principal Settlements is the likely choice while recognising that Growth Distribution Widely is likely to occur naturally unless blocked.
Change made to Sustainability Appraisal documents	Comment noted. No change proposed.
<b>Key Question 2 - Should any other strategy options be appraised?</b>	
<b>Miss A Smith, English Heritage</b>	See comments above on issue 6.
Change made to Sustainability Appraisal documents	See proposed change to previous comment.
	The Environment Agency are of the opinion that there is no need to appraise any additional strategic options.

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<b>General Comments</b>	
<b>Jane Field, The Environment Agency</b>	
Change made to Sustainability Appraisal documents	Comment noted. No change proposed.
<b>Mr James Eld</b>	The current strategies are sufficient if the size of the required development is really justified. I question where the additional residents predicted will come from.
Change made to Sustainability Appraisal documents	Comment noted. No change proposed.
<b>Key Question 3 - Do you think the comments for each strategy option are correct?</b>	
<b>Miss A Smith, English Heritage</b>	All could benefit from greater explanation of potential environmental implications beyond Greenfield land take, for example implications of potential intensification and loss of townscape character, pressure on water resources, traffic congestion and air pollution.
Change made to Sustainability Appraisal documents	Comments noted. It is anticipated that with the introduction of detailed decision making criteria a more detailed assessment and commentary can be provided, drawing on more detailed issues from each objective, including water resources, traffic congestion and air pollution.

## General Comments

### Jane Field, The Environment Agency

The Environment Agency has reviewed the options appraisal matrix with specific attention on environmental issues and generally concurs with the conclusions drawn.

However it is not clear how the appraisal of each site in relation to Objective 14 has been undertaken. The breadth of the objective i.e. from water quality (both in rivers and groundwater) to flood risk makes it difficult to give a generalized positive or negative outcome for each option.

For instance, the higher percentage of brownfield development in Stafford could potentially improve water quality if contaminated land was remediated prior to development. In addition foul drainage would be more likely to go to mains, therefore reducing the risk of water pollution. However, Stafford has a significant expanse of floodplain, and historically contaminated industrial land is located close the river, therefore development is more likely to be located in this zone creating more opportunities for the reduction of floodplain capacity.

Development in rural areas will be less prone to groundwater contamination as it is assumed there will be a higher percentage of Greenfield development (however this does not allow for improvement of the existing situation). To balance this, if adequate foul drainage infrastructure is not provided by STW Ltd there remains a higher probability of pollution occurring from a foul drainage source.

The Environment Agency looks forward to the consultation on *Delivering the Development Strategy* in the spring, and anticipate making more detailed comments on the suitability of each option based on the SFRA, as stated in para 5.3.

### Change made to Sustainability Appraisal documents

Comments noted. Previous appraisal of options in terms water resources have focused on the broad pressure additional development would put on the water system. The comments provided by the Environment Agency will be of use in the next stage of the appraisal process, where more specific locations will be appraised. Issues highlighted in the response have also been incorporated in the detailed decision making process highlighted below:

- Will it minimise and seek to reclaim derelict and contaminated land?
- Will it protect floodplain capacity?
- Will it reduce direct or indirect pollution of the water environment? Including reference to Is there adequate foul drainage infrastructure?

## Technical Appendix – Appraisal of Options

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<b>General Comments</b>	
<b>Jane Field, The Environment Agency</b>	<p>It is drawn to your attention that PPS23 may be an appropriate policy document to reference under Objective 14, as it deals with water pollution in addition to contaminated land.</p> <p>Also DETR Circular 3/99 <i>Planning Requirement in respect of the Use of Non-Mains Sewerage incorporating Septic Tanks in New Development</i> has significant implications on water quality, particularly in rural areas where there may not be a public mains sewer available. A potential indicator of water quality could be the number of development proposals which are to dispose of foul waters via a non-mains technique. It is granted that this may be unavoidable in certain situations, for example to the provision of a farm-worker's dwelling, but this should not occur for larger developments (potentially a Site Allocation) where the public mains system should be extended in order to serve such a development.</p>
Change made to Sustainability Appraisal documents	<p>Relevant information from PPS23 and the DETR Circular 3/99 has been included in the technical appendix under Objective 14.</p> <p>In addition the following indicator and target has been included into the sustainability appraisal framework</p> <p>Number of development proposals which are to dispose of foul waters via a non-mains technique</p> <p>Target: All large developments to dispose foul water via mains</p>

**vii.3 Sustainability Appraisal Commentary Vol 2**

<b>General Comments</b>	
<b>Miss A Smith, English Heritage</b>	<p>SA objective disappointing that still landscape and historic environment</p> <p>All options will also need to consider impacts on the historic environment. This underlines our original recommendations for a discrete SA objective on the historic environment.</p> <p>Further to our comments on the Draft Sustainability Appraisal Report in December 2007, we wish to reiterate the following: It is disappointing that objective 15 still uses a combined approach for landscape and cultural heritage. It is our position that a specific objective for the preservation and enhancement of the historic environment will always be necessary. The current objective is unclear and we again direct you to our recommendations for changes in our letter dated 7 December 2007.</p> <p>In future iterations of the SA it would be helpful if the format of the appraisal tables can be reviewed to make it easier to identify the objectives and options under consideration, and the inclusion of a commentary on the main basis for the assessment score.</p>
Change made to Sustainability Appraisal documents	<p>Detailed decision making criteria have been introduced into the Sustainability Appraisal Commentary Vol2 as a way to better illustrate the appraisal process. Under objective 15, the following questions have been included:</p>

## General Comments

- Will it protect and enhance sites features and areas of historical, archaeological and cultural value in both urban and rural areas?
- Will it improve the quality and character of landscapes and townscapes?
- Will it help to conserve historic buildings through sensitive adaptation and re-use?
- Will it lead to the retention and enhancement of listed buildings and/or conservation areas?
- Will it lead to reduced pressure on the cultural heritage (e.g. archaeology)?
- Will it contribute to a quality built environment?

It is anticipated that this will draw out specific impacts relating to the preservation and enhancement of the historic environment and provided greater depth to the commentary of the basis for the assessment score.

#### STAFFORD LDF: STRATEGIC ISSUES & SUSTAINABILITY APPRAISAL

##### **Rural and biodiversity issues**

Stafford is classed as "significantly rural". We would therefore expect rural issues to be reflected, and the LDF to be rural proofed. There's recognition of several issues:

- Housing
- Employment
- Farm diversification
- Economy & communities
- Facilities in rural centres – but there could be more about access to services – relevant to sustainable communities, and as an environmental issue. This is possibly covered in the recommendations at ii:10, under "development infrastructure"; but it may need to be spelt out more.
- Use of vacant land for employment (sustainability aspects of this would need to be considered)
- Staffordshire Biodiversity Action Plan
- SSSIs

##### **Environmental issues**

- Climate change is acknowledged as a key sustainability issue, with several issues listed as objectives, indicators and targets
- Why is biodiversity given as the SEA topic?
- Not very much about reducing carbon dioxide emissions – just the one reference to low-carbon energy
- The Sustainability Appraisal makes no mention of waste. Stafford's output of household waste per person is comparatively high.

##### **The six development options**

- The document does not profess to talk about these in more than general terms at this stage, and we expect there to be a more detailed assessment in due course
- This should include fuller justification for identifying options 3 and 4 as the most sustainable, including which aspects of sustainability are covered by that statement.

**Mrs Sarah Hunt, Government Office for the West Midlands**



<p><b>General Comments</b></p>	<p>Change made to Sustainability Appraisal documents</p> <p>The following are SEA Topics; biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage and landscape.</p> <p>Objective 5 now falls under the SEA Topics Population, Human Health and Material Assets and 11 falls under SEA Topics Air, Population, Human Health and Climatic Factors.</p> <p>It is anticipated that with the addition of detailed decision making criteria, there will be more specific reference to access to services, reduction of carbon dioxide emissions and waste. It is also anticipated that using the detailed decision making criteria, a more detailed assessment and commentary can be made, including which aspects of sustainability are covered in the assessment.</p> <p>Data has been collected from Local Authority Municipal Waste Statistics 2006 / 07 which illustrates the following</p> <ul style="list-style-type: none"> <li>• Stafford Borough has the second highest amount of household waste in Staffordshire and the third highest in terms of household waste per head.</li> <li>• In terms of recycling, whilst 'dry recycling' is the highest in Staffordshire, 'green recycling' is much lower, meaning Stafford Borough has the third lowest rate of recycling and composting in Staffordshire.</li> </ul> <p>This information will be carried forward in subsequent SA reports and flagged up as a sustainability issue.</p>
<p><b>Rachel Bell, Centro-WMPA</b></p>	<p>Thank you for consulting Centro-WMPA on the Stafford Borough Local Development Framework: Sustainability Appraisal Commentary, which we received on 7th January 2008.</p> <p>Centro-WMPA have not sought to answer specific questions, but provided comments on the general issues raised by this document. Although outside the metropolitan area, Centro-WMPA are happy to assist in the continued development of this document and provide information and guidance where necessary, particularly as Stafford is within the 'travel to work' area for the West Midlands region. In respect of Centro-WMPA's interest it is encouraging that the Stafford Borough LDF: Sustainability Appraisal Commentary identifies realistic and achievable areas of actions for partners and clearly acknowledges the contribution that public transport can make. Centro-WMPA is committed to improving sustainability by encouraging modal shift to public transport as the preferred mode of travel for business, leisure and pleasure.</p> <p>Centro-WMPA would also like to emphasise that it is important that there is strong correlation between the objectives of this document and the principles set out in the West Midlands Regional Spatial Strategy (WMRSS) as outlined through Policies T1-T12, the Regional Transport Strategy (RTS). This is especially important in relation to land use planning and reducing the need to travel. The presence of a high quality public transport network provides an attractive alternative to the private car and can therefore contribute to a reduction in road traffic congestion. A high quality public transport network can assist in economic growth and regeneration as well as support housing growth, help tackle congestion, and assist in increasing social inclusion, whilst also ensuring that the West Midlands transport sector contributes to the wider challenges including reducing climate changing emissions. Intense development should therefore be focused in places that are well served by public transport as outlined by the Regional Spatial Strategy Policy T2. Additionally a high quality public transport network can help to ensure that all people, especially those without access to a private car, can access key services such as employment or educational opportunities.</p> <p>Centro-WMPA would be supportive of actions that clearly promote the role of public transport in achieving sustainability aims. For example, promotion of the following messages: -</p>

<p><b>General Comments</b></p>	<ul style="list-style-type: none"> <li>• Cross boundary journeys for employment, socially necessary or leisure purposes by public transport.</li> <li>• A coherent package supporting 'smarter choices' to encourage behavioural change in peoples travel patterns complemented by a high quality public transport system which allows people to make informed choices about which mode they use to travel where and when they need to. Also encouraging developments that generate significant demand on travel to be located near public transport.</li> <li>• Promoting greater use of and additional spaces at park and ride facilities (including cycle racks)</li> <li>• Promotion of rail routes to provide better and wider coverage</li> <li>• Working with bus operators for better fuel-efficient vehicle standards.</li> <li>• Promotion of public transport and sustainable communities to enable environmental change.</li> </ul> <p>More generally, Centro-WMP TA seeks to continually improve its own environmental performance and contribution to sustainable development from all of its activities, infrastructure, products and services, such as influencing operators in using better fuel efficient vehicles and working with a range of national, regional and local organisations to support and encourage behavioural and cultural change to increase in the number of people who use public transport for their journeys.</p> <p>I would appreciate you keeping me informed on the progress of this document and if you have any further queries, would like any further information, please do not hesitate to contact me.</p>
<p>Change made to Sustainability Appraisal documents</p>	<p>Comments noted.</p> <p>Relevant policies in the RSS and Regional Transport Strategy have been carried forward into the relevant sections in the technical appendices.</p> <p>In addition the following decision making criteria have been included alongside the sustainability objectives.</p> <p>Will it lead to a net reduction in the number of people commuting to work outside the borough?</p> <p>Will it support existing services and facilities?</p> <p>Will it result in new developments being located in areas served by public transport?</p> <p>Will it improve accessibility to key local services?</p> <p>Will it make access easier for those without a car?</p> <p>It is anticipated that this will give a more detailed assessment and commentary on transport and travel to work information.</p>
<p>Jane Field, The Environment Agency</p>	<p>Thank you for referring the above sustainability appraisal in support of your Development Strategy document. This was received via the Limehouse Portal on 4<sup>th</sup> January 2008, and in hard copy format on 7<sup>th</sup> January 2008.</p>

<p><b>General Comments</b></p>	<p>We welcome the addition of various plans, programmes and policies, and rewording of targets and indicators as requested in our previous letter of 7<sup>th</sup> December 2007.</p> <p>We recommend however, that the final two indicators and targets relating to Objective 14 are amended in subsequent SAs as they appear to duplicate each other. It is advised that the indicators would better read:</p> <p><i>Indicator:- the number of developments given planning permission contrary to Environment Agency advice based on an unacceptable risk of contamination to 'Controlled Waters'</i></p> <p><b>Target:- None</b></p> <p>Section 104 of the 1991 Water Resources Act defines 'Controlled Waters' as "territorial waters which extend seawards for three miles, coastal waters, inland freshwaters, that is to say, the waters in any relevant lake or pond or of so much of any relevant river or watercourse as is above the freshwater limit, and ground waters, that is to say, any waters contained in underground strata". This therefore encapsulates all the water quality issues for concern.</p>
<p>Change made to Sustainability Appraisal documents</p>	<p>The following 2 indicators and targets have been removed.</p> <p>The number of development given planning permission contrary to EA advice</p> <p>Target: None</p> <p>Number of developments given planning permission contrary to EA advice</p> <p>Target: No planning permission to be granted contrary to the Environment Agency's advice based on the risk of contamination to underlying groundwater</p> <p>The following has been included</p> <p><i>Indicator:- the number of developments given planning permission contrary to Environment Agency advice based on an unacceptable risk of contamination to 'Controlled Waters'</i></p> <p>Target:- None</p>
<p><b>Sustainability Appraisal Objectives</b></p>	
<p>Mr James Eld</p>	<p>Ensure the maintenance of a viable and productive agricultural system in the borough by minimising the amount of productive agricultural land taken for housing and employment development.</p>

General Comments	
Change made to Sustainability Appraisal documents	<p>In is anticipated that the inclusion of the following detailed decision making criteria will address the issue of loss of productive agricultural land.</p> <ul style="list-style-type: none"> <li>• Will it result in the protection/retention of the Best and Most Versatile agricultural land (Grades 1-3a)?</li> </ul> <p>In terms of sustainability Objective 4 - To support the needs of the local rural economy and community - rural public houses are crucial both to economic and social well-being. This is recognised by many rural planning authorities. Should there be any opportunity to revise the indicators, therefore, an additional indicator - number of community public houses and target - no reduction should be incorporated.</p> <p>In terms of the key sustainability issues given at the end of the section, under social issues - we would argue that 'decline in local community pubs' should be added to the bullet points. As you will be aware, numbers of both urban and rural pubs are now falling. (CAMRA has a database to evidence this should you be interested)</p> <p>Comments noted. Loss of public houses to housing is an issue across the country and there are several cases of this in the Borough. It is anticipated that the inclusion of the following detailed decision making criteria will address the issue of loss of local services, including public houses.</p> <ul style="list-style-type: none"> <li>• Will it improve accessibility to key local services?</li> <li>• Will it protect existing key services and facilities?</li> </ul> <p>Loss of local services and facilities has also been flagged up as a key sustainability issue.</p>
Key Question 1 - Do you think broad options and alternatives identified in the table are correct?	
<b>Miss A Smith, English Heritage</b>	<p>The identified options and alternatives are wide ranging, but tend to be based on directly contrasting options rather than more subtle variations. An additional option is building reuse, conversion over new build.</p>
Change made to Sustainability Appraisal documents	<p>Comments notes. Building reuse, conversion over new build has been added as an option in the Mode / Process section of the options table.</p>
Jane Field, The Environment Agency	<p>The Environment Agency considers there are no broad options or alternatives omitted from the SA.</p>
Change made to Sustainability Appraisal documents	<p>Comment noted. No change proposed.</p>
Paragraph 4.4	

<b>General Comments</b>	
Mr James Eld	I consider that the Stafford, Stone and Principal Settlements is the likely choice while recognising that Growth Distribution Widely is likely to occur naturally unless blocked.
Change made to Sustainability Appraisal documents	Comment noted. No change proposed.
<b>Key Question 2 - Should any other strategy options be appraised?</b>	
Miss A Smith, English Heritage	See comments above on issue 6.
Change made to Sustainability Appraisal documents	See proposed change to previous comment.
Jane Field, The Environment Agency	The Environment Agency are of the opinion that there is no need to appraise any additional strategic options.
Change made to Sustainability Appraisal documents	Comment noted. No change proposed.
Mr James Eld	The current strategies are sufficient if the size of the required development is really justified. I question where the additional residents predicted will come from.
Change made to Sustainability Appraisal documents	Comment noted. No change proposed.
<b>Key Question 3 - Do you think the comments for each strategy option are correct?</b>	
<b>Miss A Smith, English Heritage</b>	All could benefit from greater explanation of potential environmental implications beyond Greenfield land take, for example implications of potential intensification and loss of townscape character, pressure on water resources, traffic congestion and air pollution.
Change made to Sustainability Appraisal documents	Comments noted. It is anticipated that with the introduction of detailed decision making criteria a more detailed assessment and commentary can be provided, drawing on more detailed issues from each objective, including water resources, traffic congestion and air pollution.
<b>Jane Field, The Environment Agency</b>	-



## General Comments

	<p>The Environment Agency has reviewed the options appraisal matrix with specific attention on environmental issues and generally concurs with the conclusions drawn.</p> <p>However it is not clear how the appraisal of each site in relation to Objective 14 has been undertaken. The breadth of the objective i.e. from water quality (both in rivers and groundwater) to flood risk makes it difficult to give a generalised positive or negative outcome for each option.</p> <p>For instance, the higher percentage of brownfield development in Stafford could potentially improve water quality if contaminated land was remediated prior to development. In addition foul drainage would be more likely to go to mains, therefore reducing the risk of water pollution. However, Stafford has a significant expanse of floodplain, and historically contaminated industrial land is located close the river, therefore development is more likely to be located in this zone creating more opportunities for the reduction of floodplain capacity.</p> <p>Development in rural areas will be less prone to groundwater contamination as it is assumed there will be a higher percentage of Greenfield development (however this does not allow for improvement of the existing situation). To balance this, if adequate foul drainage infrastructure is not provided by STW Ltd there remains a higher probability of pollution occurring from a foul drainage source.</p> <p>The Environment Agency looks forward to the consultation on <i>Delivering the Development Strategy</i> in the spring, and anticipate making more detailed comments on the suitability of each option based on the SFRA, as stated in para 5.3.</p>
<p>Change made to Sustainability Appraisal documents</p>	<p>Comments noted. Previous appraisal of options in terms water resources have focused on the broad pressure additional development would put on the water system. The comments provided by the Environment Agency will be of use in the next stage of the appraisal process, where more specific locations will be appraised. Issues highlighted in the response have also been incorporated in the detailed decision making process highlighted below:</p> <ul style="list-style-type: none"> <li>• Will it minimise and seek to reclaim derelict and contaminated land?</li> <li>• Will it protect floodplain capacity?</li> <li>• Will it reduce direct or indirect pollution of the water environment? Including reference to Is there adequate foul drainage infrastructure?</li> </ul>
<h3>Technical Appendix – Appraisal of Options</h3>	
<p><b>Jane Field, The Environment Agency</b></p>	<p>It is drawn to your attention that PPS23 may be an appropriate policy document to reference under Objective 14, as it deals with water pollution in addition to contaminated land.</p> <p>Also DETR Circular 3/99 <i>Planning Requirement in respect of the Use of Non-Mains Sewerage incorporating Septic Tanks in New Development</i> has significant implications on water quality, particularly in rural areas where there may not be a public mains sewer available. A potential indicator of water quality could be the number of development proposals which are to dispose of foul waters</p>



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General Comments	
	<p>via a non-mains technique. It is granted that this may be unavoidable in certain situations, for example to the provision of a farm-worker's dwelling, but this should not occur for larger developments (potentially a Site Allocation) where the public mains system should be extended in order to serve such a development.</p>
<p>Change made to Sustainability Appraisal documents</p>	<p>Relevant information from PPS23 and the DETR Circular 3/99 has been included in the technical appendix under Objective 14.</p> <p>In addition the following indicator and target has been included into the sustainability appraisal framework:</p> <p>Number of development proposals which are to dispose of foul waters via a non-mains technique</p> <p>Target: All large developments to dispose foul water via mains</p>

<b>Guiding principles appraisal</b>	
<b>Natural England</b>	<p><b>Guiding principles</b></p> <p>Natural England supports the proposed wording to “Reduce impact on the natural environment in terms of waste, carbon emissions and use of natural resources”</p> <p>“Avoid areas at risk from flooding including locations vulnerable to either fluvial or surface water flooding”</p> <p>Natural England acknowledges and supports this suggested policy wording change. Its importance is emphasised by the fundamental link between this subject matter, effective green infrastructure and its role in providing ecosystem services.</p> <p>“Development on Previously Developed Land”</p> <p>We draw the Council’s attention to potential biodiversity impacts and the need for appropriate survey and assessment to inform decisions.</p> <p>We note that the “Attitude to area” criterion is assessed as ‘0’ (neutral) – This appears to risk underplaying outcomes from the SANGs approach to major housing in the borough – a stimulus for an integrated approach to green infrastructure provision, with all its benefits.</p>
Change made to Sustainability Appraisal documents	<p>Comments noted. The Revised Sustainability Appraisal report to reappraise policies, taking into account any changes that result from the consultation on the draft publication. The appraisal to take into account assessments of possible biodiversity habitats present on previously development land sites and the social benefits from green infrastructure and SANGS.</p> <p>Should there be any strategy for SANGS, this will be reported in the Revised Sustainability Appraisal report.</p>
<b>Strategic Development Locations</b>	

<p><b>Guiding principles appraisal</b></p>	<p><b>Natural England</b></p> <p><b>Strategic Development Locations</b></p> <p><i>“Development proposals should be consistent with other local planning policies”</i></p> <p>We strongly support this wording clarification - this has important positive environmental protection and enhancement effects e.g. addresses current lack of SSSI/biodiversity policy coverage in Stone policy. This cross cutting policy approach needs to be cross referenced throughout the Core Strategy. By stating in core policy what is expected across the borough SDL policy can simply refer to relevant policy adding further policy text on environmental issues only where this serves to safeguard and enhance key local features/the sense of place</p> <p>Further examples:</p> <p><i>Policy: New development in the countryside</i></p> <p><i>H. They do not harm any protected species on site and provide habitat mitigation and enhancement</i></p> <p><i>Policy: Extensions to the Curtilage of Dwellings</i></p> <p><i>Addition of word ‘habitat’</i></p> <p>As for the Strategic Development Locations policy above the protected species and habitats (including BAP Priority species and habitats) issue should be treated as a cross-cutting policy theme.</p>
<p>Change made to Sustainability Appraisal documents</p>	<p><i>“Development proposals should be consistent with other local planning policies” added to the document.</i></p>
<p><b>Stafford Town</b></p>	

<b>Guiding principles appraisal</b>	
<b>Natural England</b>	<p><i>Environment</i></p> <p><i>Provision of new Green Infrastructure (GI) for Stafford Town such as the Penk and Sow natural parklands as well as the Stafford Common Community Park together with local area schemes that respond to the characteristics, local needs and opportunities for improved GI</i></p> <p><i>provision and biodiversity assets of the town;</i></p> <p><i>Ensure that development does not damage the integrity of the Cannock Chase Special Area of Conservation (SAC);</i></p> <p><i>Ensure that development is not located in areas of flood risk or contribute to flooding elsewhere;</i></p> <p><i>Development is sympathetic to the natural landscape”</i></p> <p>We welcome the distinction between tourism and environment. This clarifies and addresses the current location of SSSI related text under ‘tourism’.</p> <p>With regard to proposed additional wording in last line we propose that specific wording such as ‘landscape character’ replaces ‘natural landscape’ in order to define more clearly what is meant.</p> <p>Agreed landscape character to replace natural landscape</p>
Change made to Sustainability Appraisal documents	Agreed landscape character to replace natural landscape
<b>East of Stafford</b>	
<b>Natural England</b>	<p>This part of the SA report doesn’t consider the effects of the proposed eastern access improvement scheme. Baswich Meadows SSSI lies close by and the whole area lies within the Cannock Chase SAC ZOI. See below under ‘eastern direction of growth’ for further SA material of relevance.</p> <p>Agreed. Revised Sustainability Appraisal to incorporate information from the Staffordshire County Council Sustainability Appraisal and Habitat Regulations Assessment.</p>
Change made to Sustainability Appraisal documents	Agreed. Revised Sustainability Appraisal to incorporate information from the Staffordshire County Council Sustainability Appraisal and Habitat Regulations Assessment.
<b>Stone</b>	

<b>Guiding principles appraisal</b>	
<b>Natural England</b>	<p>We note that river quality issues were raised in the evidence base but are not reflected in policy.</p>
Change made to Sustainability Appraisal documents	<p>Agreed. River quality issues to be addressed in the policy through the suggested recommended additions to the policy:</p> <ul style="list-style-type: none"> <li>• Ensuring that new developments adopt sustainable drainage techniques (SUDS) in order to reduce surface water flooding</li> <li>• Facilitate upgrades to Pirehill wastewater treatment works;</li> </ul>
<b>Climate Change</b>	
<b>Natural England</b>	<p><i>Natural green-space - Positive impact due to enhanced open space and green links as part of SUDS</i></p> <p>Natural green-space – reference to open space as part of SUDS. Source and send eco-system services info to demonstrate the breadth of these services and their relationship with natural green-space.</p> <p>NB ‘SSSI quality’ criterion in report appears to be used interchangeably with wider biodiversity interests.</p>
Change made to Sustainability Appraisal documents	<p>Noted. No change to appraisal of climate change policy. SUDS are referenced in two policies – climate change and Environmental Management and Green Infrastructure both of which aim to recognise the relationship between SUDS and natural green-space.</p> <p>Agreed regarding the ‘SSSI quality’. Other decision making criteria are set out in the SA Framework - ensure these are followed in the Revised SA Report.</p> <ul style="list-style-type: none"> <li>• Will it lead to the protection of designated sites?</li> <li>• Will it lead to the enhancement of designated sites?</li> <li>• Will it result in habitat creation at all scales/Will it conserve and enhance natural/ seminatural habitats?</li> <li>• Will it conserve and enhance nationally significant species and habitats?</li> <li>• Will it improve biodiversity within urban areas?</li> <li>• Will it enhance the wider ecological network and seek to minimise the fragmentation of nature corridors and networks?</li> </ul>
<b>Policy: Canal Facilities and New Marinas</b>	
<b>Natural England</b>	<p>Assessed as having minor positive effect on natural green-space and SSSI – We believe it is important to note that this positive outcome is subject to effective implementation of other relevant policies in the plan (see comments above re protected/BAP species and habitats)</p>
Change made to Sustainability Appraisal documents	

<b>Guiding principles appraisal</b>	Comment noted. Considered the policy offers adequate environmental protection in terms of habitat and biodiversity but consider an overarching statement in the plan that all planning policies apply to all applications would be beneficial.
<b>Stafford - Eastern direction of growth</b>	
<b>Natural England</b>	We note this concept's reliance upon an Eastern Distributor road or Eastern access improvement scheme. Natural England has set out its concerns regarding the scheme's effects in our representations on the Core Strategy document.
Change made to Sustainability Appraisal documents	<b>Noted. Appraisal to consider effects of this and any other new route in revised SA Report, drawing on work carried out by Staffordshire County Council.</b>
<b>Habitat Regulations Assessment</b>	
<b>Natural England</b>	We acknowledge the SA Report commentary regarding the Cannock Chase SAC Screening report. Does the Council know when HRA for remaining SAC/Ramsar will be available?
Change made to Sustainability Appraisal documents	<b>Agreed. Sustainability Appraisal to provide commentary on the HRA for the remaining SAC and RAMSAR sites. The screening opinion will be refreshed early 2012 and sent to Natural England for comment.</b>
<b>Water Framework Directive</b>	



<p><b>Guiding principles appraisal</b></p> <p><b>Environment Agency</b></p>	<p>As raised within our previous response to your Local Choice consultation, it is key that the objectives of the Water Framework Directive (WFD) are achieved through the implementation of the Humber and Severn River Basin Management Plans (RBMPs), as new development and redevelopment provides many opportunities to help your Authority work towards its targets for the water bodies in the borough.</p> <p>In light of this, we recommend that your SA assesses the effectiveness of the plan against the local objectives of these RBMPs, and ensures that the plan maximises its opportunities to promote improvement in the characteristics and status of all types of water bodies.</p> <p>We note that Core Policy 3 is marked as having an uncertain impact on water quality (SA Objective 14), and that Core Policy 7 states that the policy does not adequately address water issues raised in the evidence base. The addition of suitable WFD policies within the Core Strategy should ensure that these policies can only have a positive impact on water. The WFD does not allow for any detrimental impact and as such this needs to be addressed within robust proposals and policies.</p> <p>We note that a target of SA Objective 14 is to achieve standards set out by WFD. As WFD puts a large focus on ecological quality of rivers in addition to water quality, we recommend a similar target is also considered for SA Objective 12.</p>
<p>Change made to Sustainability Appraisal documents</p>	<p>Agreed. Section added to appendix setting out the relevant local objectives for the Humber and Severn Basin Management Plan. Further policy wording recommended within Core Policy 14: The Natural Environment &amp; Green Infrastructure:</p> <p>The Borough's natural environment will be protected, enhanced and improved by:</p> <ul style="list-style-type: none"> <li>● Implementation of the Staffordshire Biodiversity Action Plan and guidance including 'Biodiversity by Design' or any other successor documents to increase and enhance biodiversity, in terms of habitats and species as well as geological conservation or geodiversity through appropriate management for a network of:             <ol style="list-style-type: none"> <li>i. Designated Sites (international, national, regional and local);</li> <li>ii. Biodiversity Action Plan habitats and species populations;</li> <li>iii. Wildlife Corridors and Ecological Networks;</li> </ol> </li> <li>● Conservation and enhancement of water courses and their settings for their landscape character, biodiversity and recreational value, particularly for the Borough's extensive canal system;</li> <li>● Protecting, conserving and enhancing the historic environment and irreplaceable semi-natural habitats such as ancient woodlands;</li> <li>● Increasing the ability of landscapes and ecosystems to adapt to different weather patterns by increasing the range and extent of habitats, informed by Biodiversity Opportunity mapping produced by Natural England;</li> <li>● Ensuring that no new development takes place in areas where environmental risks, particularly flooding, cannot be managed properly;</li> <li>● Any new development where damage to the natural environment is unavoidable must include measures to mitigate or compensate such impacts through the establishment of replacement habitats or features including appropriate site management regimes.</li> </ul>

## Guiding principles appraisal

The Borough's green infrastructure network will be protected, enhanced and expanded to enhance quality of life, increase sustainability, reduce the impacts of climate change and improve health and well being across these overarching objectives:

- Networks of open spaces, natural corridors, access routes and watercourses will be enhanced and created to:
  - i. protect the setting of landscape, heritage and natural (biodiversity and geodiversity) assets
  - ii. reverse habitat fragmentation
  - iii. provide recreational opportunities for new and existing communities
  - iv. provide open breaks between neighbouring residential areas and business developments.
- The network of existing access routes will be improved and expanded to allow sustainable commuting, including:
  - i. shared surfaces to reduce vehicle speeds
  - ii. providing safe, attractive and well-signed walking and cycling routes between residential areas, employment centres, green spaces and the wider countryside.
- Local landscape and heritage features should:
  - i. Be retained as focal points for new neighbourhoods,
  - ii. Have their historic nature protected
  - iii. Act as attractive green and open spaces where communities can come together.

To alleviate the effects of climate change **and meet the objectives of the Water Framework Directive:**

- i. Measures such as Sustainable Drainage Systems and street trees must be included in new developments and should be 'retro-fitted' into existing developments
- ii. Green spaces will provide a flood storage / management function (where appropriate)
- iii. Provide adequate development easement from watercourses (culverted or otherwise)
- iv. Incorporate proposals for deculverting and renaturalisation of watercourses.

All new developments will:

- i. Be set within a well designed and maintained attractive, green setting demonstrated through a detailed management plan
- ii. Provide a variety of spaces to meet the needs of people and nature
- iii. Provide safe opportunities for sustainable transport
- iv. Achieve at least the green infrastructure standards laid out in a Supplementary Planning Document.

## Flood Risk

<b>Guiding principles appraisal</b>	
<b>Environment Agency</b>	We note that Core Policy is correctly marked as red against SA Objective 5, due to the fact that key sites are located within the floodplain. As outlined within our response to the Core Strategy, the SA should demonstrate these sites are acceptable as they are the only suitable sites for such a development. Details should therefore be included which demonstrate how PPS25's Sequential Test has been applied and passed for these sites (and any other within the floodplain).
Change made to Sustainability Appraisal documents	Comments noted. An appendix to be added to the Revised SA Report showing how sites identified within The Plan have satisfied the sequential test methodology as set out in the SFRA Level 1.

### vii.5 Sustainability Appraisal of Strategic Policy Choices

<b>General Comments</b>	
Natural England	Natural England have been consulted on the Sustainability Appraisal for the Plan for Stafford previously and would refer you to our previous comments. In addition we note that comments in the Appraisal of Strategic Policy Choices table regarding indicator 12 state that "There are sufficient sites outside of designated areas for this level of development". We would like to remind you of the potential for impacts from outside of designated sites, including indirect impacts such as those referred to above concerning recreational pressures on Cannock Chase SAC.
Change made to Sustainability Appraisal	Comments noted and agreed. Revised Sustainability Appraisal to include commentary on the potential indirect impacts on designated sites. The analysis of the Visitor Survey for Cannock Chase is near completion and this will be used to assist with this.
Environment Agency	Having reviewed the document <i>Strategic Policy Choices: Sustainability Appraisal</i> we are pleased to see that this view on level of growth is reflected within the assessment, and it is acknowledged that having adequate policies in place is key to ensuring there are no detrimental impacts on the water environment, and that flood risk will pose no risk to development (Policy Choices 1-3 on scale of growth, SA Objs 5 &14).  The impacts of SA Objectives 5 &14 are also correctly assessed under each of the locational Policy Choices 4-6. The Environment Agency has no comments to make on the Policy Choices 7-10.  With regards to the indicators and targets, we question whether the indicators for Sustainability Objective 12 should be reworded to clarify that only <i>detrimental</i> / impacts on biodiversity conservation should be minimised. Is it possible that some impacts from development could be beneficial, given that this objective is to protect and enhance biodiversity value?  Sustainability Objective 14, the first indicator is to minimise the number of developments that " <i>increase water consumption or pollution</i> ". How do you define an increase in water consumption - does this refer to the amount of water used per dwelling on average across the borough? Because if new development is built unless it relies solely on harvested rainwater it will increase the use of water.  We welcome the inclusion of Water Framework Directive targets as part of this objective, however, recommend as previously that this is also reflected in Sustainability Objective 12, as the ecology of waterbodies is a key factor when determining success under the WFD, as ecological value is closely linked to the water quantity and quality of a river.

<b>General Comments</b>	<p>Comments noted. Indicators under Sustainability Objective 12 reworded to include word 'detrimental'. Agree that some impacts from development could lead to an improvement in terms of biodiversity, habitat creation and green infrastructure links.</p> <p>Comment regarding water consumption noted. Intended that this related to efforts made to reduce water consumption along with energy efficiency compared with developments where no reductions have been incorporated. This to be made clearer in the indicator</p> <p>Comments agreed – Water Framework Target also incorporated under Sustainability Objective 12.</p>
<b>Non-technical Summary</b>	<p>I understand we have to treat our earth with respect for the good of all of us and most important future generations to follow but i cannot understand why you keep refusing planning apps for small villages as you are killing off village life as we once knew it, they are becoming retirement areas or as one observative person described our village Stowe by Chartley (gods waiting room)</p> <p>No we do not want a housing estate in these villages but small growth is vital for us to stay active and sustainable as over the years we have lost our school, post office and shop leaving one pub the church and village hall, all three are having to work extremely hard to exist and without a small increase in population all three will be history in the future.</p> <p>I have had an active roll with the village for the last twenty years now as a parish Councillor and village hall committee member, the comments i have made are supported by the majority of Stowe by Chartley Parish Council and the residents.</p>
Change made to Sustainability Appraisal documents	<p>Comments noted. The criteria based option in the Strategic Policy Choices document would allow small scale growth in villages such as Stowe by Chartley. The final policy will be assessed in the Revised Sustainability Appraisal. The Sustainability process has acknowledged that development only in larger settlements would not be local need in small rural communities.</p>
Mrs Vanessa Darlington	<p>In relation to the siting of new development in Stone I have read with interest the WYG Planning and Design options appraisal that suggests the need for a new supermarket in Stone to meet supposed over capacity of Morrisons by 2015. I am dismayed that the options appraisal exercise has only put one site forward this being Westbridge Park that would require the demolition and re-siting of Westbridge Gym, the</p>

<p><b>General Comments</b></p>	<p>Scout hut and childrens play area. There is no mention of the football pitches or fact that this green open space is the ONLY area in the Town suitable for hosting large community events. The option appraisal makes no mention that this site hosts Stone Carnival, Stone Bonfire, the annual raft race, dog show and car boot, Westbridge 5k Race, the Steeplechase, annual Scout parade etc - the potential allocation of this site for retail/ foodstore is not just about being able to relocate existing 'buildings' on the site! it's re-allocation would rip the heart out of Stone.</p> <p>I disagree that Westbridge Park is the only opportunity available in close proximity to the Town that could accommodate a new supermarket (Tesco) post 2015. It is a known fact that most people travelling to the supermarket travel by car therefore sites slightly further afield should have been looked at. The deciding criteria for any new supermarket should not be that it is within walking distance of Stone High Street as this need is already met through Morrisons, the Co-operative and various independent retailers in Stone High Street including bakers and the fruit &amp; vegetable store.</p> <p>Other sites that should be fully investigate for a potential supermarket should include:</p> <ol style="list-style-type: none"> <li>1/ Green field land off the A34 before entering the roundabout to the Whitebridge Estate between the canal and A34</li> <li>2/ Land adjacent to Aston Marina</li> <li>3/ Newcastle Street the Council Area Highways Office &amp; Depot combined with the Tennis Courts (these could be located to Westbridge Park as part of a S106 deal)</li> <li>4/ Green field Land on the Eccleshall Road past Walton</li> <li>5/ Land next the cricket club on Uttoxeter Road</li> </ol> <p>The majority of these sites would be greenfield development but I believe far more acceptable to the people of Stone than the loss of the open land at Westbridge Park that is used for so many community events attracting audiences up to 10,000 people. Westbridge Park is the centre of Stone for Community events.</p>
<p>Change made to Sustainability Appraisal documents</p>	<p>Comments noted. The Strategic Policy Choices does not contain information relating to retail development in the Borough. Various town centre options had been considered previously in the Issues and Options document and the town centre boundary considered in the Draft Publication. Should a site be allocated in the plan, this will be appraised in the Revised Sustainability Appraisal Report.</p>
<p><b>1.1 Paragraph</b></p>	
<p>Mr Francis Biard</p>	<p>mention of NPPF. Ministerial Foreword &amp; paras; 6 - 10. might help as well.</p>
<p>Change made to Sustainability Appraisal documents</p>	<p>Agreed. Definition of Sustainable Development from the NPPF to be included in these opening sentences.</p>
<p><b>2.12 paragraph</b></p>	



<b>General Comments</b>	<p>IN STONE, CHRISTCHURCH WAY IS ALREADY A PROBLEM AREA FOR BOTH PEDESTRIANS AND TRAFFIC. YOUR PROPOSALS ON ADDITIONAL HOUSING AND INDUSTRIAL DEVELOPMENT WILL ONLY ENCOURAGE MORE THROUGHPUT IN THE TOWN CENTRE. WHERE IS THE SUSTAINABILITY OF LEAVING STONE AS IT IS ,WHEN 500 NEW HOUSES ARE PROPOSED AT WALTON ON THE HILL?</p> <p>STONE IS A COMMUTER MARKET TOWN AS EMPLOYMENT IS CURRENTLY SPARSE, WITH TOO MANY HOUSES AT PRESENT. THEREFORE, THE DEVELOPMENT OF STONE BUSINESS PARK TOGETHER WITH NEW HOMES IS LEAVING STONE IN A STATUS QUO POSITION.</p> <p>A DOWNGRADED HOSPITAL IN STAFFORD IS A PROBLEM FOR PATIENTS IN ITS SURROUNDING CONURBATION , A SITUATION THAT NEEDS SORTING OUT WITH THE PRESENT HOUSING AND INDUSTRIAL STOCK WITHOUT ADDING MORE EXPONENTIAL PROBLEMS. ENTRY ON BEHALF OF THREE DISGRUNTLED STAFFORD AND STONE RESIDENTS.</p>
Change made to Sustainability Appraisal documents	Comments noted, no change to the Sustainability Appraisal process.
<b>3.25 Paragraph</b>	
Mr Francis Biard	<p>Given Objective 15; " To protect, enhance and, where necessary, restore designated landscape areas and town character, scenic beauty, local distinctiveness, historic and cultural character." This paragraph would benefit from being expanded to cover the historic built environment, Conservation Areas, Listed Buildings, Archeological sites and features as well as general and historic landscape character of the whole of the Borough. All of these features are documented. They provide the Borough with its unique and local character which needs to adapt to future changes and pressures and be protected and enhanced.</p> <p>A specific environmental issue of the protection, adaptation and exploitation of this resource could then be identified in the summary box below.</p>
Change made to Sustainability Appraisal documents	Comments agreed. Further explanation on the different heritage assets, which are considered part of the historic environment, included along with adding the protection and adaptation as a key environmental issue.
<b>4.1 Paragraph</b>	
Mr Michael Smith	<p>4. This is to be supported with the <b>express exception</b> of wind turbine projects. Energy companies are actively and aggressively seeking to recruit farmers to host wind turbines with lucrative financial packages (subsidised by the tax payer). These projects are based upon farms becoming "power stations". In doing so they ruin a beautiful landscape which is a real asset to Staffordshire.</p> <p>11. This is to be supported with the <b>express exception</b> of wind turbine projects. There is a variety of alternative means of generating renewable energy, including solar panels and biomass, etc.</p>



<p><b>General Comments</b></p>	<p>12. Wind turbines are a danger to the biodiversity of an area causing danger to nesting birds, bats etc. Wind turbines change the features of the entire landscape for the worse.</p> <p>15. Wind turbines ruin the "scenic beauty" of the Staffordshire countryside which is an asset to the County and Stafford Borough. Given that the area already suffers from the environmental impact of the M6 Motorway any further infrastructure blight on the landscape of this nature should be resisted. Wind turbines are not harmonious with the openness of our beautiful countryside.</p> <p>18. A borough wide policy against wind turbines would create certainty and comfort for residents of the Borough. At the moment, there are several proposals for turbines, arising out of the aggressive marketing efforts of the energy companies. This is creating widespread upset and concern across the borough as small groups of local residents with little of no experience of the planning system try to counteract the steamroller approach of businesses with expert planning lawyers who have successfully obtained permission for turbines elsewhere. The balance is wrong, and we understand that the Localism Bill was brought in to assist local residents to protect their environment from such unwanted developments.</p> <p>20. The prospect of a wind turbine in your back yard has a serious negative impact on well-being. There are numerous concerns of health, the environment, the impact on property values. In addition the prospect of a lengthy, difficult and stressful period of fighting a planning application puts a lot of stress and strain on local residents who have to quickly get to grips with a very difficult situation. Overall, within the framework of these objectives, Stafford Borough Council should seek to support its many rural residents and protect its future as a tourist destination by considering a borough wide strategic policy ban on wind turbine projects, whilst encouraging other forms of renewable energy which do not have a negative effect on the borough's Precious skyline.</p>
<p>Change made to Sustainability Appraisal documents</p>	<p>Comments noted, no change proposed to the Sustainability Appraisal process. The Strategic Policy Choices document does not specifically mention location or scale of wind turbines. The policy that will be used to assess such impacts will be appraised in the Revised Sustainability Appraisal, which will consider whether it adequately addresses potential environmental and social impacts of renewable energy schemes.</p> <p>4. This is to be supported with the <b>express exception</b> of wind turbine projects. Energy companies are actively and aggressively seeking to recruit farmers to host wind turbines with lucrative financial packages (subsidised by the tax payer). These projects are based upon farms becoming "power stations". In doing so they ruin a beautiful landscape which is a real asset to Staffordshire.</p> <p>11. This is to be supported with the <b>express exception</b> of wind turbine projects. There is a variety of alternative means of generating renewable energy, including solar panels and biomass, etc.</p> <p>12. Wind turbines are a danger to the biodiversity of an area causing danger to nesting birds, bats etc. Wind turbines change the features of the entire landscape for the worse.</p> <p>15. Wind turbines ruin the "scenic beauty" of the Staffordshire countryside which is an asset to the County and Stafford Borough. Given that the area already suffers from the environmental impact of the M6 Motorway any further infrastructure blight on the landscape of this nature should be resisted. Wind turbines are not harmonious with the openness of our beautiful countryside.</p>
<p>Angela Murphy</p>	

General Comments	
	<p>18. A borough wide policy against wind turbines would create certainty and comfort for residents of the Borough. At the moment, there are several proposals for turbines, arising out of the aggressive marketing efforts of the energy companies. This is creating widespread upset and concern across the borough as small groups of local residents with little of no experience of the planning system try to counteract the steamroller approach of businesses with expert planning lawyers who have successfully obtained permission for turbines elsewhere. The balance is wrong, and we understand that the Localism Bill was brought in to assist local residents to protect their environment from such unwanted developments.</p> <p>20. The prospect of a wind turbine in your back yard has a serious negative impact on well-being. There are numerous concerns of health, the environment, the impact on property values. In addition the prospect of a lengthy, difficult and stressful period of fighting a planning application puts a lot of stress and strain on local residents who have to quickly get to grips with a very difficult situation.</p> <p>Overall, within the framework of these objectives, Stafford Borough Council should seek to support its many rural residents and protect its future as a tourist destination by considering a borough wide strategic policy ban on wind turbine projects, whilst encouraging other forms of renewable energy which do not have a negative effect on the borough's Precious skyline.</p>
Change made to Sustainability Appraisal documents	<p>Comments noted, no change proposed to the Sustainability Appraisal process. The Strategic Policy Choices document does not specifically mention location or scale of wind turbines. The policy that will be used to assess such impacts will be appraised in the Revised Sustainability Appraisal, which will consider whether it adequately addresses potential environmental and social impacts of renewable energy schemes.</p>
Mr Francis Biard	<p>The Sustainability Objectives are the key to assessing the strategy and policies of the plan. While the sustainability issues have been identified in section three, there is little in this document to explain why the 20 Sustainability Objectives in the table have been selected and whether there are differences in their importance. The Sustainability Objectives are critical in the plan process yet seem to have little justification set out.</p>
Change made to Sustainability Appraisal documents	<p>Comments noted. The Sustainability Objectives were first set out in the Scoping Report September 2007. There have been amendments to the indicators and decision-making criteria as a result of consultations on Sustainability appraisal documents since then.</p>
Mr C J Leather	<p>4. This is to be supported with the <b>exception development that are overpowering to the rural community and surrounds</b> such as wind turbine projects. Energy companies are actively and aggressively seeking to recruit farmers to host wind turbines with lucrative financial packages (subsidised by the tax payer). These projects are based upon farms becoming "industrial units" and in doing so contravene the use of land for agriculture. They do not represent rural diversification but outright commercial development. They ruin a beautiful landscape which is a real asset to Staffordshire. The local rural economy includes tourism and uses such as Farmhouse Bed and Breakfast which will all be adversely effected by industrial sized development in the countryside.</p> <p>11. This is to be supported but taking into account the carbon footprint for wind energy being greater than the saving it should be with the <b>express exception</b> of wind turbine projects. There is a variety of alternative means of generating renewable energy, including solar panels and biomass, etc.</p> <p>12. Wind turbines are a danger to the biodiversity of an area causing danger to nesting birds, bats and some mammals etc. Wind turbines change the features of the entire landscape for the worse.</p>

<p><b>General Comments</b></p>	<p>15. Wind turbines ruin the "scenic beauty" of the Staffordshire countryside which is an asset to the County and the Stafford Borough. Given that the area already suffers from the environmental impact of the M6 Motorway any further infrastructure blight on the landscape of this nature should be resisted. The heritage of the area must be protected and any form of development that will physically or visually effect grade 1 and grade 2* listed buildings and their historic settings should be rejected. Wind turbines are not harmonious with the openness of our beautiful countryside.</p> <p>18. A borough wide policy against wind turbines would create certainty and comfort for residents of the Borough. At the moment, there are several proposals for turbines, arising out of the aggressive marketing efforts of the energy companies. This is creating widespread upset and concern across the borough as small groups of local residents with little of no experience of the planning system try to counteract the steamroller approach of businesses with expert planning lawyers who have successfully obtained permission for turbines elsewhere. The balance is wrong, and we understand that the Localism Bill was brought in to assist local residents to protect their environment from such unwanted developments.</p> <p>20. The prospect of a wind turbine in your back yard has a serious negative impact on well-being. There are numerous concerns of health, the environment, the impact on property values. In addition the prospect of a lengthy, difficult and stressful period of fighting a planning application puts a lot of stress and strain on local residents who have to quickly get to grips with a very difficult situation. Overall, within the framework of these objectives, Stafford Borough Council should seek to support its many rural residents and protect its future as a tourist destination by considering a borough wide strategic policy ban on wind turbine projects, whilst encouraging other forms of renewable energy which do not have a negative effect on the borough's precious, and at present, unspoilt landscape and skyline.</p>
<p>Change made to Sustainability Appraisal documents</p>	<p>Comments noted, no change proposed to the Sustainability Appraisal process. The Strategic Policy Choices document does not specifically mention location or scale of wind turbines. The policy that will be used to assess such impacts will be appraised in the Revised Sustainability Appraisal, which will consider whether it adequately addresses potential environmental and social impacts of renewable energy schemes.</p> <p>4. This is to be supported with the <b>express exception</b> of wind turbine projects. Energy companies are actively and aggressively seeking to recruit farmers to host wind turbines with lucrative financial packages (subsidised by the tax payer). These projects are based upon farms becoming "power stations". In doing so they ruin a beautiful landscape which is a real asset to Staffordshire.</p> <p>11. This is to be supported with the <b>express exception</b> of wind turbine projects. There is a variety of alternative means of generating renewable energy, including solar panels and biomass, etc.</p> <p>12. Wind turbines are a danger to the biodiversity of an area causing danger to nesting birds, bats etc. Wind turbines change the features of the entire landscape for the worse.</p> <p>15. Wind turbines ruin the "scenic beauty" of the Staffordshire countryside which is an asset to the County and Stafford Borough. Given that the area already suffers from the environmental impact of the M6 Motorway any further infrastructure blight on the landscape of this nature should be resisted. Wind turbines are not harmonious with the openness of our beautiful countryside.</p>

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Change made to Sustainability Appraisal documents	<p>Comments noted, no change proposed to the Sustainability Appraisal process. The Strategic Policy Choices document does not specifically mention location or scale of wind turbines. The policy that will be used to assess such impacts will be appraised in the Revised Sustainability Appraisal, which will consider whether it adequately addresses potential environmental and social impacts of renewable energy schemes.</p>
Mr and Mrs Bramall	<p>4. This is to be supported with the <b>express exception</b> of wind turbine projects. Energy companies are actively and aggressively seeking to recruit farmers to host wind turbines with lucrative financial packages (subsidised by the tax payer). These projects are based upon farms becoming "power stations". In doing so they ruin a beautiful landscape which is a real asset to Staffordshire.</p> <p>11. This is to be supported with the <b>express exception</b> of wind turbine projects. There is a variety of alternative means of generating renewable energy, including solar panels and biomass, etc.</p> <p>12. Wind turbines are a danger to the biodiversity of an area causing danger to nesting birds, bats etc. Wind turbines change the features of the entire landscape for the worse.</p> <p>15. Wind turbines ruin the "scenic beauty" of the Staffordshire countryside which is an asset to the County and Stafford Borough. Given that the area already suffers from the environmental impact of the M6 Motorway any further infrastructure blight on the landscape of this nature should be resisted. Wind turbines are not harmonious with the openness of our beautiful countryside.</p> <p>18. A borough wide policy against wind turbines would create certainty and comfort for residents of the Borough. At the moment, there are several proposals for turbines, arising out of the aggressive marketing efforts of the energy companies. This is creating widespread upset and concern across the borough as small groups of local residents with little of no experience of the planning system try to counteract the steamroller approach of businesses with expert planning lawyers who have successfully obtained permission for turbines elsewhere. The balance is wrong, and we understand that the Localism Bill was brought in to assist local residents to protect their environment from such unwanted developments.</p>



<p><b>General Comments</b></p>	<p>20. The prospect of a wind turbine in your back yard has a serious negative impact on well-being. There are numerous concerns of health, the environment, the impact on property values. In addition the prospect of a lengthy, difficult and stressful period of fighting a planning application puts a lot of stress and strain on local residents who have to quickly get to grips with a very difficult situation.</p> <p>Overall, within the framework of these objectives, Stafford Borough Council should seek to support its many rural residents and protect its future as a tourist destination by considering a borough wide strategic policy ban on wind turbine projects, whilst encouraging other forms of renewable energy which do not have a negative effect on the borough's Precious skyline.</p>
<p>Change made to Sustainability Appraisal documents</p>	<p>Comments noted, no change proposed to the Sustainability Appraisal process. The Strategic Policy Choices document does not specifically mention location or scale of wind turbines. The policy that will be used to assess such impacts will be appraised in the Revised Sustainability Appraisal, which will consider whether it adequately addresses potential environmental and social impacts of renewable energy schemes.</p>
<p>Tina Thatcher</p>	<p>4. This is to be supported with the <b>express exception</b> of wind turbine projects. Energy companies are actively and aggressively seeking to recruit farmers to host wind turbines with lucrative financial packages (subsidised by the tax payer). These projects are based upon farms becoming "power stations". In doing so they ruin a beautiful landscape which is a real asset to Staffordshire.</p> <p>11. This is to be supported with the <b>express exception</b> of wind turbine projects. There is a variety of alternative means of generating renewable energy, including solar panels and biomass, etc.</p> <p>12. Wind turbines are a danger to the biodiversity of an area causing danger to nesting birds, bats etc. Wind turbines change the features of the entire landscape for the worse.</p> <p>15. Wind turbines ruin the "scenic beauty" of the Staffordshire countryside which is an asset to the County and Stafford Borough. Given that the area already suffers from the environmental impact of the M6 Motorway any further infrastructure blight on the landscape of this nature should be resisted. Wind turbines are not harmonious with the openness of our beautiful countryside.</p> <p>18. A borough wide policy against wind turbines would create certainty and comfort for residents of the Borough. At the moment, there are several proposals for turbines, arising out of the aggressive marketing efforts of the energy companies. This is creating widespread upset and concern across the borough as small groups of local residents with little of no experience of the planning system try to counteract the steamroller approach of businesses with expert planning lawyers who have successfully obtained permission for turbines elsewhere. The balance is wrong, and we understand that the Localism Bill was brought in to assist local residents to protect their environment from such unwanted developments.</p> <p>20. The prospect of a wind turbine in your back yard has a serious negative impact on well-being. There are numerous concerns of health, the environment, the impact on property values. In addition the prospect of a lengthy, difficult and stressful period of fighting a planning application puts a lot of stress and strain on local residents who have to quickly get to grips with a very difficult situation.</p> <p>Overall, within the framework of these objectives, Stafford Borough Council should seek to support its many rural residents and protect its future as a tourist destination by considering a borough wide strategic policy ban on wind turbine projects, whilst encouraging other forms of renewable energy which do not have a negative effect on the borough's Precious skyline.</p>

<b>General Comments</b>	Comments noted, no change proposed to the Sustainability Appraisal process. The Strategic Policy Choices document does not specifically mention location or scale of wind turbines. The policy that will be used to assess such impacts will be appraised in the Revised Sustainability Appraisal, which will consider whether it adequately addresses potential environmental and social impacts of renewable energy schemes.
<b>5.4 Paragraph</b>	The summary of this appraisal begins " Whilst the SA shows similar results for both policy choices..." What then follows is a justification for the choice of approach taken. That choice is not predicated by the appraisal, it is a subsequent value judgement and that is not made clear. The danger is that the argument that the course taken is because the appraisal showed it was more sustainable is actually not true. Sustainability is open to much interpretation and a lot of the words in section 5 in particular do not seem to acknowledge this. It came out top in the test so its the way to go is the simplistic way the process could be abused.
Change made to Sustainability Appraisal documents	There were two options for the delivery of affordable housing. The first requiring all developments to provide 30% of developments as affordable housing. The second is to provide area specific target based on viability of that area. The information provided in the evidence shows that some areas viability would allow a higher level of affordable housing to be delivered without a negative impact on profitability of the development. The Sustainability Appraisal, as set out in the table in the appendices, whilst showing a similar appraisal of both options considers that more affordable housing would be delivered with the second option.
<b>Habitat Regulations Assessment</b>	
<b>Natural England</b>	Natural England advise that the Local Plan will need to be compliant with The Conservation of Habitats & Species Regulations 2010 (the "Habitats Regulations") and therefore an updated Habitats Regulations Assessment ("HRA") will be required with respect to any policy changes. Natural England must be consulted regarding any revisions to the HRA.  Natural England retains its statutory discretion to modify its present advice or opinion in view of any and all such additional matters or any additional information related to this consultation that may come to our attention.
Change made to Sustainability Appraisal documents	Agreed. The Habitats Regulations Assessment is currently being prepared and will be made available alongside the Publication plan.





## viii Water Framework Directive

Water in rivers, estuaries, coasts and aquifers will improve under measures set out in River Basin Management Plans, drawn up for river basin districts across England and Wales under the Water Framework Directive.

River Basin Management Plans are plans for protecting and improving the water environment and have been developed in consultation with organisations and individuals. They contain the main issues for the water environment and the actions we all need to take to deal with them. Everyone uses water in their daily lives, whether for recreational activities, industry, agriculture or as a water consumer.

The River Basin Management Plans have been approved by the Secretary of State for the Department for Environment, Food and Rural Affairs.

Stafford Borough falls under the Humber River Catchment District.

This area includes the River Trent from its source to its confluence with the River Tame. There are also a number of tributaries in the upper reaches of the River Trent which flow through the highly urban catchment of Stoke-on-Trent.

The catchment supports abstraction for public water supply, for spray irrigation and industrial purposes. Abstraction for public water supply takes place from the sandstone aquifers and Blithfield Reservoir on the River Blithe. The reservoir is designated as a Site of Special Scientific Interest (SSSI) for over-wintering birds. It is also a major salmonid fishery and the River Blithe is also a mixed trout and coarse fishery. There is a current Voluntary Initiative partnership to minimise the impact of pesticide use around the Blithfield Reservoir catchment.

Historically, poor water quality and poor habitat in the River Trent downstream of Stoke-on-Trent have impacted upon fisheries. Water quality has improved over the last twenty years, particularly with improvements to sewage treatments works and storm discharges to the River Trent in Stoke-on-Trent and associated tributaries.

There are a number of Special Areas of Conservation and Sites of Special Scientific Interest within the Staffordshire Trent Valley catchment including Cannock Chase, Chartley Moss and Pasturefields Saltmarsh. The River Trent downstream of Strongford STW (Tittensor) was designated in 2004 as a Sensitive Area under the Urban Wastewater Treatment Directive.

The legacy from the coal-mining industry in the catchment, particularly around Stoke-on-Trent and Cannock have led to issues with contamination and rising minewaters, both of which need to be carefully managed to minimise the impact on water quality.

### Key statistics at a glance – Staffordshire Trent Valley catchment

River and lake water bodies	Now	2015
% at good ecological status or potential	6	10
% assessed at good or high biological status (34 water bodies assessed)	24	35
% assessed at good chemical status (8 water bodies assessed)	63	63
% at good status overall (chemical and ecological)	6	10
% improving for one or more element in rivers		28

There are 46 river water bodies and five lakes in the catchment. 19 are artificial or heavily modified. Four per cent of rivers (43 km) currently achieve good or better ecological status/potential. 24 per cent of rivers assessed for biology are at good or better biological status now, with 30 per cent at poor biological status, and 11 per cent at bad status.

Point source discharges from water industry sewage works are key reasons for failures in the catchment. Physical modification due to urbanisation, water storage and supply and flood protection, along with diffuse pollution from agriculture also play a key role in determining the status of rivers and lakes in this catchment.

### **Some key actions for this catchment**

- Improve sewage treatment works at a number of locations to reduce the levels of phosphate under the requirements of the Urban Wastewater Treatment Directive.
- Carry out investigations to determine the impact of abstractions in limiting the achievement of good ecological potential.
- Improve sewage treatment works at a number of locations where the measured dry weather flow has exceeded the Consented flow.
- Target pollution prevention campaigns around industrial areas in the upper Staffordshire Trent Valley catchment, particularly around Stoke-on-Trent.

The following policies in The Plan for Stafford Borough will assist with meeting the Water Framework Directive:

- Policy Stafford 2 – North of Stafford
- Policy Stafford 3 – West of Stafford
- Policy Stafford 4 – East of Stafford
- Policy Stone 1 – Stone Town
- Policy Stone 2 – West and South of Stone
- Policy E4 - Raleigh Hall & Ladfordfields Recognised Industrial Estates
- Policy N2 - Climate Change
- Policy N4 - The Natural Environment & Green Infrastructure
- Policy N5 - Sites of European, National & Local Nature Conservation Importance

**viii.1 SFRA**

Previous planning policy as set out in Planning Policy Statement 25 (PPS25) Development and Flood Risk, stated that the Sustainability Appraisal of Local Development Documents should incorporate or reflect the planning authority’s Strategic Flood Risk Assessment (SFRA), to ensure that the planning strategies for the area support the Government’s objectives for development and flood risk.

Stafford Borough has appointed consultants to carry out a joint SFRA with several authorities within Staffordshire. Whilst the results of the assessment have been reported in a separate document, information has been drawn on when assessing policy and strategic location development options through the Sustainability Appraisal process.

Following the methodology for the sequential test, as set out in the SFRA the following steps have been carried out.

Step One: Strategic Overview of flood risk across all potential development areas

**Table 16 Step One: Strategic Overview of flood risk across all potential development areas**

Development Location	Flood Risk Issues
North of Stafford	Site does not lie within Flood Zone
West of Stafford	Part of site lies within Flood Zone 2
East of Stafford	Site does not lie within Flood Zone
Raleigh Hall and Ladfordfields	Site lies adjacent to Flood Zone 3
Land West and South of Stone	Small area of land to the north of the site in Flood Zone 2 at Filly Brook

**Step Two: Flood Risk Issues in Zone 1**

This step is not applicable as none of the development sites are in Flood Zone 1.

**Step Three: Sequential Test in Zones 2 and 3**

a) Apply the measure of avoidance/prevention by moving the boundaries of the potential sites away from Zones 2, 3a and 3b, for those cases where the loss of site area is acceptable. This is generally the case at locations where the loss in area is of the order of 10%.

For Ladfordfields, the boundary runs adjacent to the Flood Zone boundary

b) Provisionally adopting land uses that are fully compatible with the vulnerability classification of PPS 25, to try to avoid the need to apply the Exception Test where possible.

Table 17 **Sequential Test in Zones 2 and 3**

West of Stafford	Policy Stafford 3 requires a Master Plan to be produced for the area taking into account design and layout and the following vii. A comprehensive drainage and flood management scheme will be delivered to implement development at the Strategic Development Location, including measures to alleviate flooding  and surface water management on Doxey Brook and tributaries to the River Sow;
Land West and South of Stone	Policy Stone 2 requires a Master Plan to be produced for the area taking into account design and layout and the following viii. Measures to alleviate flooding and surface water management on the sites and reduce associated implications for the Trent valley corridor through necessary works and Sustainable Drainage Systems (SUDS)

Previous alternative site options and associated flood issues are presented below:

Table 18 Alternative site options and associated flood issues

Development Location	Flood Risk Issues
<b>Stafford Housing Options</b>	
SF-3 Land north and south of Tixall Road Drive	Site does not lie within Flood Zone
SF-5 Land east of Fairway	Part of site lies in Flood Zone 2 and 3
SF-6 Land east of Stockton Lane	Site does not lie within Flood Zone
SF-7 Land east of Cannock Road A34	Site does not lie within Flood Zone
SF-8 Land west of Cannock Road A34 and east of River Penk	Part of site lies in Flood Zone 2 and 3
SF-9 Land west of Wolverhampton Road A449	Part of site lies in Flood Zone 2 and 3
SF-10 Land south of School Lane, Rickerscote and west of River Penk	Adjacent to Flood Zone 2 and 3 boundary
<b>Stafford - Employment Options</b>	
SF-a Land east of Beaconside	Site does not lie in a Flood Zone
SF-b Land west of Tollgate	Site lies partially within Flood Zone 2 and 3
SF-d Land east of Fairway	Site is surrounded by Flood Zone 2 and 3
SF-e Land east of Wolverhampton Road A449	Site lies within flood zone 2 and 3
SF-g Land south of Creswell Grove	Site lies adjacent to Flood Zone 2 and 3
SF-i Land east of A34 Stone Road	Site does not lie in a Flood Zone
<b>Stone – Housing Locations</b>	
SN-1 Land north of Pingle Lane	Site does not lie in a Flood Zone

Development Location	Flood Risk Issues
<b>Stafford Housing Options</b>	
SN-2 Land north of Lichfield Road	Site does not lie in a Flood Zone
SN-3 Land south of Eccleshall Road	Site does not lie in a Flood Zone
SN-5 Land north of A34 at The Fillybrooks	Site is surrounded by Flood Zone 2 and 3
<b>Stone - Employment Options</b>	
SN-a Land between A51 Stone bypass and A34 Stafford Road	Site partially within Flood Zone 2 and 3
<b>Raleigh Hall (RH) – Employment Locations</b>	
RH-a Land off Cold Meece Road	Site does not lie in a Flood Zone
<b>Ladfordfields (LA) – Employment Locations</b>	
LA-a Land south of Bridle Lane	Site does not lie in a Flood Zone
LA-b Land north of Woodseaves Road Locations	Site does not lie in a Flood Zone