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SUSTAINABILITY STATEMENT

Land North of Stafford
Akzo Nobel UK

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Quality Management

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Table of Contents

1 Introduction 4
2 Methodology 6
3 Context and Sustainability Issues 7
4 Sustainability Appraisal Findings 10
5 Overall Conclusions 13

Appendices
Appendix A – Sustainability Objectives and Results of the SA
Figure 1 – Site Location

1 Introduction

WSP Environmental Ltd has been commissioned by Akzo Nobel UK to undertake a Sustainability Appraisal (SA) of the proposed residential development within an area of land to the north of Beaconside, Stafford (hereinafter referred to as the site) (refer to Figure 1). The SA will support the representations for development of the site for two site options.

This SA considers two options for the development of the site. Option A comprises the extent of the site as depicted on Figure 1 but excludes the 'northern finger' of land. Option B incorporates this additional parcel of land (the 'northern finger' of land) which comprises the extent of the site boundary, as illustrated on Figure 1.

The proposals comprise the construction of residential properties with associated green spaces, a primary school and a local centre.

This Sustainability Statement (SS) presents the methodology and findings of the SA of the Proposed Development. The outputs of the SA are a description of the performance of the Proposed Development against a set of sustainability objectives. The sustainability objectives are based upon those used to undertake the Revised Sustainability Appraisal Addendum for the emerging Stafford Borough Council Local Plan (2013).

1.1 Site Description

The site is approximately 33ha (Option A) in size and is located on the north side of the Stafford urban area at the junction of the A513 Beaconside to the south and A34 Stone Road to the west. Option B is approximately 44ha in size.

The surrounding area to the site is dominated by agricultural land in all directions from the site. In addition, the Parkside residential area is located further south of the A513, and Prime Point and ProLogis Park employment areas are located further southwest of the A34. Marston Gate Farm is located to the east of the site on Marston Lane and Red Hill Farm is to the north of the Site. Marston Brook and Sandyford Brook are located to the east of the site.

The emerging Local Plan ('The Plan for Stafford Borough') will replace the Adopted Local Plan and will comprise a series of Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs). A number of land areas have been identified in the pre-submission proposals map and pre-submission publication (2013) of the new Local Plan to allocate strategic areas for new employment and residential development. The majority of the site (Option A only) is located in an area identified as a strategic development area for housing. Further strategic housing areas are located to the east of the site with an area of employment land identified to the west of the site. The additional land incorporated within Option B is currently not located within an allocated area for development.

Option A

The site is currently undeveloped and predominantly under agricultural use, approximately 60% of which is classified as Grade 3a (good quality), approximately 30 per cent is classified as Grade 3b (moderate quality), and the remainder (in the south east corner) classified as Grade 4 (poor quality). The remaining land comprises road network and seasonal and permanent ponds.

The topography of the site undulates dramatically with a topographical high point of around 110m Above Ordnance Datum (AOD) near the centre which then falls in all directions to a low point adjacent to the eastern boundary of around 95m AOD.

Option B

The Option B Site is located within the same area as the Site with an extension of the boundary some 470m further north, therefore the majority of the baseline for the Site is therefore the same for Option A. The additional parcel of land is irregular in shape and contains a slightly higher proportion of Grade 3a (good quality) and Grade 4 (poor quality) agricultural land. The Grade 4 land is contained in the north western, the north eastern and the south eastern corners of the site.

1.2 Background to Sustainable Development

Sustainable development is advocated through international initiatives including the World Summit on Sustainable Development held in Johannesburg, 2002; national initiatives including the UK Government Sustainable Development Strategy (DEFRA, 2005 'Securing our Future'); and local initiatives such as Local Agenda 21 (LA21), developed in response to the Rio Summit in 1992. The principle of sustainable development runs throughout UK Government Strategy and planning policy.

Sustainable development is commonly defined as:

> *"Development that meets the needs of the present without compromising the ability of future generations to meet their own needs" (Brundtland Report, 1987 'Our Common Future').*

Sustainable development is about creating solutions that meet environmental, social and economic objectives in an integrated and holistic way. The UK Government's strategy Securing Our Future - A Strategy for Sustainable Development in the UK (DEFRA, 2005) identifies five key objectives:

- Living within environmental limits;
- Ensuring a strong healthy and just society;
- Achieving a sustainable economy;
- Promoting good governance; and
- Using sound science responsibly.

2 Methodology

This section sets out the approach adopted for the SA. The approach has been divided into two key tasks comprising the appraisal of the Proposed Development (both Option A and Option B) and the preparation of a Sustainability Statement. A description of these tasks is provided below.

2.1 Appraisal of the Proposed Development

The two options for the Proposed Development have been appraised to determine how the proposals meet the sustainability objectives. In addition, further actions / enhancement measures are recommended for integration into the Proposed Development or alternatively to be addressed more fully at the detailed design stage.

As previously stated, the sustainability objectives have been sourced from the Revised SA Addendum undertaken for the Stafford Borough Council emerging Local Plan. These objectives, together with the detailed results of the SA (presented in the form of a matrix) are presented in Appendix A.

Table 2.1 below sets out the notation used to appraise the two options for the Proposed Development against the sustainability objectives. This has been based upon that used in the Revised SA Addendum for the emerging Local Plan.

Table 2.1: Notations used in the sustainability appraisal

Impact	Description	Symbol
Major Positive Impact	The Proposed Development contributes to the achievement of the sustainability objective and is likely to deliver enhancements.	√√
Minor Positive Impact	The Proposed Development contributes partially to the achievement of the sustainability objective but not completely.	√
Neutral Effect	There is no clear relationship between the Proposed Development and/or the achievement of the sustainability objective or the relationship is negligible.	0
Minor Negative Impact	The Proposed Development partially detracts from the achievement of some elements of the sustainability objective.	x
Major Negative Impact	The Proposed Development detracts from the achievement of all elements of the sustainability objective.	xx
Uncertain / Depends Upon Implementation	It is not possible to determine the nature of the impact as there may be too many external factors that would influence the appraisal or the impact may depend heavily upon implementation of the Proposed Development (i.e. what, how and where).	?

2.2 Sustainability Statement

This SS was then prepared to outline the methodology for, and document the findings of, the SA of the Proposed Development. It describes the performance of the two options for the Proposed Development with respect to the sustainability objectives and the policy context set out in Section 3 including the key sustainability issues identified for the area. The report also proposes a set of potential sustainability enhancement measures. It is the intention that this SS will accompany a future planning application.

3 Context and Sustainability Issues

3.1 Introduction

This section provides a review of the key documents that set the regional and local planning policy context for Stafford. The key aims and objectives of the plans and programmes reviewed set the context for both options for the Proposed Development.

3.2 Policy Background

This section focuses on the local policy context that informs the sustainability context for the proposed development (there are currently no relevant regional policies in place). These documents have been produced in view of the national policy context, particularly the National Planning Policy Framework (NPPF). The review of these documents is provided in Table 3-1 below.

Table 3-1: Review of Relevant Local Policy

Relevant Policy	Details
Local Policy	
Stafford Borough Local Plan 2001	The current adopted development plan for Stafford Borough contains policies directing development proposals and promoting appropriate land-use. The Local Plan as part of the Planning and Compulsory Purchase Act 2004 was saved in its entirety until 27th September 2007. The Secretary of State made the decision on what policies should be saved beyond this date. There are a number of policies which have been saved which relate to Nature Conservation, Protected Open Space and Green Network.
Stafford Borough Emerging Local Plan ('The Plan for Stafford Borough')	The Local Plan will guide development in the borough for the next 20 years. It will comprise a series of Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs). It sets out locations for future development and how the development can be provided taking account of issues such as transport, community services, education and open space. This emerging Local Plan was submitted to the Secretary of State for independent examination in August 2013. Prior to this, an updated SA Revised Report and Revised SA Report Addendum were produced to include an assessment of a recently submitted proposal to ensure all reasonable alternatives are assessed.

The following Local Plans are also of relevance:

- Staffordshire and Stoke-on-Trent Structure Plan 1996-2011;
- Staffordshire Biodiversity Action Plan;
- Shaping the Future of Staffordshire 2005 – 2020: The Sustainable Strategy for the County;
- Stafford Borough Partnership Sustainable Community Strategy 2008-2020;
- Stafford Borough Council Housing Strategy;
- Stafford Borough Council Biodiversity Strategy;
- Stafford Borough Council Local Agenda 21 Strategy;
- Stafford Borough Council Local Cultural Strategy;

- Stafford Borough Council Stafford Town Centre Vision – Urban Design Framework;
- Stafford Borough Council Tree Strategy;
- Stafford Borough Council Green Infrastructure Strategy;
- Stafford Borough Council Contaminated Land Inspection Strategy;
- Stafford Borough Integrated Transport Strategy 2013-2031;
- Staffordshire County Council Local Transport Plan;
- Staffordshire County Council Minerals and Waste Local Plans; and
- Staffordshire County Council Cycling Strategy.

3.3 Standards and Regulations

The following relevant standards and regulations have also been reviewed.

Code for Sustainable Homes (2008)

This is a national standard for sustainable design and construction of new homes and will relate to the residential aspects of the Proposed Development.

The Code measures the sustainability of a new home against nine categories of sustainable design, rating the 'whole home' as a complete package. The nine categories are:

- Energy/CO_2 emissions;
- Water;
- Materials;
- Surface water run-off;
- Waste;
- Pollution;
- Health and wellbeing;
- Management; and
- Ecology.

The Code uses a 1 to 6 star rating system to communicate the overall sustainability performance of a new home. The Code sets minimum standards for energy and water use at each level and, within England, replaces the EcoHomes scheme, developed by the Building Research Establishment (BRE).

The Code will provide valuable information to home buyers, particularly in terms of lower energy costs, and offer builders a tool with which to differentiate themselves in sustainability terms.

Building Regulations

These establish building and construction standards, of which there are 13 including one relating to conserving fuel and power.

Part L of the Building Regulations outlines some essential, economically viable, objectives that can be measurable against those contained within the 2007 Energy White Paper and the Energy Performance of Buildings Directive. Obligations under Part L include minimum standards for heating and lighting efficiency; incorporation of fuel savings measures when retrofitting and refurbishing; and revised Standard Assessment Procedure (SAP) standards for building efficiency.

3.4 Local Area Key Sustainability Issues

The environmental and sustainability baseline relevant to the Proposed Development has been characterised from reference to a number of documents[1]. The key sustainability issues and opportunities are presented below.

Environmental

- Loss of biodiversity.
- Quality of SSSI's is improving, but still below National target.
- River biology and chemistry improving over the last decade but both are still under the national average.
- Stafford's Biomass energy project provides renewable energy and opportunities for further renewable development in the future.

Social

- High levels of deprivation in some areas of the Borough.
- Relatively small number of empty homes across the Borough, although many have been empty for more than 6 months.
- Relatively high number of homeless households.
- Low level of provision of affordable housing compared with rising house prices.
- Lack of access to public transport, services and facilities in some parts of the Borough, especially in rural areas.
- The level of outdoor space provision is much lower than the national target.

Economic

- Decline in manufacturing industry resulting in job losses.
- Lack of economic diversity.
- Low unemployment rate.
- Opportunities for tourist related economy.
- Slight increase in VAT business start ups in Stafford.
- Decline in agricultural industries.
- Vacant units within the town centres.
- Growth in out of town warehouses.
- Proximity to motorway.

[1] Including the 2005 SA of emerging Local Plan

4 Sustainability Appraisal Findings

This section provides a summary of the main findings of the SA of the two options for the Proposed Development. The findings are presented in three categories relating to social, environmental and economic sustainability issues. Recommendations for potential enhancements are also provided. The full SA matrices detailing the performance of the two options for the Proposed Development against individual objectives can be found in Appendix A.

4.1 Social

As this is a residential led scheme, the social considerations predominately relate to housing provision and the proximity of the site to services and facilities. However, the indirect effects associated with these issues are also discussed where relevant. The key findings of the SA in relation to social issues are presented in the following bullet points:

- It is acknowledged that Option A is an allocated housing site, whereas Option B includes land which is not allocated. However, both options for the Proposed Development will help to meet the housing needs in the area including the provision of good quality and affordable housing. The housing mix reflects local needs. Option B performs better in this regard through the provision of a higher number of houses than Option A;
- Both options for the Proposed Development will contribute to improved access for all. A primary school and a local centre will be provided. Access to existing community facilities and services (e.g. within Stafford town centre) will be maintained and enhanced. The proposals seek to improve the local road network to reduce congestion and delays within the area, thereby improving connectivity and amenity;
- The Proposed Development is on an existing public transport corridor and further proposes extended bus services together with new and enhanced cycling and pedestrian linkages. This would encourage the use of sustainable modes of travel and potentially contribute to increased physical fitness and health benefits;
- A Travel Plan will be implemented to maximise the use of public transport;
- Both options for the Proposed Development promote outdoor recreation opportunities through the provision of communal greenspaces throughout the site, thereby indirectly contributing to opportunities to improve health and wellbeing;
- In order to ensure the safety of the future residents, it is the intention that the Proposed Development will adhere to the principles of Secured By Design and the principles of passive surveillance in order to minimise crime; and
- The provision of high quality and affordable housing, a primary school, a local centre, enhanced environmental quality, greenspace provision and increased accessibility would generate improved aspirations, social wellbeing and an inclusive community. It is the intention that the proposed housing will create an individual mix of housing to generate a distinct identity to the site, whilst maintaining the local character, thereby reinforcing a sense of place and individuality.

4.2 Environmental

The key findings of the SA in relation to environmental issues are presented in the following bullet points:

- The creation of a large scale residential development has the potential to contribute to higher levels of greenhouse gas emissions through increased private car use. However, both options for the Proposed Development include commitments to enhance and promote the use of sustainable modes of transport, which would reduce dependency upon private car use. It is also proposed to enhance the existing road network to facilitate the movement of traffic and alleviate congestion;
- The residential development will meet Code For Sustainable Homes Level 3 which will help to reduce CO_2 emissions through reduced energy consumption and increased use of renewable energy sources;

- The vast majority of the Proposed Development site lies within Flood Risk 1, although detailed flood modelling has confirmed that there are very small areas of the Site designated as Flood Zones 2 and 3 along the northern boundary of Option A and the western boundary of the additional 'northern finger' of land included in Option B. Sensitive development (such as residential properties) will be located within Flood Zone 1. In addition, in order to ensure that potential flood risk is taken into account, the use of sustainable drainage systems (SuDS) will be incorporated where possible. The implementation of the Proposed Development will help reduce current runoff thereby reducing flood risk downstream;
- Both options for the Proposed Development could lead to a potential loss of biodiversity resources though land-take in Greenfield areas. However, the proposals directly seek to maintain and enhance biodiversity and protect existing natural habitats, e.g. through the provision of planting, green linkages and areas of open space. In addition, existing ponds will be retained and wherever possible existing trees and hedgerows, and other notable habitat types, on the site will be retained, protected and enhanced. The presence of bat, badger and breeding / wintering birds has been confirmed, however suitable mitigation will be implemented to protect these species;
- Both options for the Proposed Development would result in the permanent loss of agricultural land (some of which is classed as the best and most versatile). However, as the site is previously undeveloped, there is scope to utilise soils sustainably through best practice construction methods;
- Both options for the Proposed Development are located within Greenfield land, and therefore could lead to pollution of local watercourses through increased runoff. However, the proposals seek to mitigate against increased runoff from new development, which would reduce any pollution risks. In addition, SuDS will be incorporated wherever possible;
- The Code for Sustainable Homes will be met in order to ensure the most efficient use of natural resources. Both options for the Proposed Development would incorporate sustainable construction and design principles in order to minimise energy use and maximise energy efficiency. In addition, application of these standards should lead to a progressive reduction in waste generation and encourage greater levels of re-use and recycling;
- Both options for the Proposed Development would result in a permanent change in the local landscape, as development would occur on Greenfield land, and a number of receptors would experience visual intrusion. It would therefore need to be ensured that development would be integrated into the local landscape, primarily through careful consideration of the retention and enhancement of the existing soft landscape;
- The mix of proposed housing and open spaces will create an individual mix of housing that will bring a distinct identity to the site, reinforcing a sense of place and individuality, whilst clearly defining public and private spaces;
- In order to ensure that archaeologically important features are preserved if present, it is proposed that suitable mitigation measures will be undertaken prior and or during construction (if required) to mitigate for any potential findings; and
- Both options for the Proposed Development advocate the development of new housing in an accessible location and highlight the importance of effective public transport links, thereby directly contributing to the promotion of sustainable transport. This should help to offset any potential adverse effects associated with increased development at this location.

4.3 Economic

As this is a residential led scheme, the economic benefits are less tangible. The key findings of the SA in relation to economic issues are presented in the following bullet points:

- Both options for the Proposed Development would contribute to regeneration initiatives through their proposals for good quality housing, a primary school, a local centre, public open space and improvement to the local road network and sustainable transport. This would attract new residents to the area which in turn could lead to increased investment, facilitate regeneration and create a place people want to work and live;

- The Proposed Development will involve the loss of working farm land. However, the farm business tenant does not rely solely upon the Site and would therefore stay in business;
- Development would create a large number of temporary construction opportunities, and some permanent employment opportunities associated with the primary school and local centre;
- Enhanced connectivity and sustainable travel opportunities within the area would facilitate the growth of sustainable local economies, and provide better access to existing job opportunities for future residents; and
- The town centre may also benefit from the Proposed Development, associated with increased household expenditure.

4.4 Recommendations for Potential Enhancements

In addition to the measures already in place to improve the sustainability performance of the Proposed Development, the SA process has identified potential areas of enhancement that could be integrated:

- Ensure affordable housing is tenure blind;
- Community cohesion could be achieved through continued community involvement (e.g. public consultations) in the design of the development to ensure their needs, ideas and knowledge are taken into account to improve the quality and acceptability of the development;
- Careful consideration of the retention and enhancement of the existing soft landscape would be essential to ensure the Proposed Development blends within the rural setting;
- Consider proposals for the long-term management of open spaces and the scope for involving residents in that process;
- In order to ensure that archaeologically important features (if present) are preserved suitable mitigation measures will be undertaken prior and or during construction (if required) to mitigate for any potential findings; and
- Appropriate mitigation measures will need to be implemented in order to ensure adequate protection against noise and achieve acceptable noise levels.

5 Overall Conclusions

WSP Environmental Ltd has been commissioned by Akzo Nobel to undertake an SA of the proposed residential development within an area of land to the north of Beaconside, Stafford.

The two options for the Proposed Development were appraised to determine how the proposals meet the sustainability objectives and where further actions / enhancement measures could be integrated into the scheme or will need to be addressed more fully at the detailed design stage.

The SA matrix (presented in Appendix A) identifies that, although both options for the Proposed Development are at an early stage, a number of key sustainability principles have already been addressed. These are summarised in Section 4 of this appraisal. The findings of the SA also illustrate that there are no significant differences between the sustainability of Option A and Option B. However, Option B performs better against the housing related objective through its provision of a higher number of dwellings to meet local need.

Appendices

Appendix A – Sustainability Objectives and Results of the SA

5.1.1 As previously stated, the predicted effects associated with the sustainability objectives have been given a score according to the following notation:

Major Positive	√√
Minor Positive	√
Neutral Effect	0
Minor Negative	X
Major Negative	XX
Uncertain / Depends Upon Implementation	?

Sustainability Objective	Option A Score	Option B Score	Commentary
Social (including Community)			
To ensure that everyone has the opportunity of a decent and affordable home	√√	√√	The availability of affordable housing is currently an issue within Stafford. Both options for the proposed development directly support the achievement of this objective by providing flexibility for affordable housing within the design. The proposals for affordable housing will help to meet the housing requirements of the location, and will be evenly distributed across the site (unless justification for reducing the affordable component is provided prior to the commencement of each phase of the development). Option B would perform slightly better through its provision for a higher number of dwellings. The properties will accord, where feasible, with the Code for Sustainable Homes, the core design principles of the Lifetime Homes standard checklist and relevant Building Regulations. In addition, the detailed scheme will be designed to equal all pertinent access standards and recommendations and will comply with Part M of the building regulations.
To improve opportunities for access for all to work, education, health and local services	√√	√√	Both options for the Proposed Development advocate the development of new housing in an accessible location and highlight the importance of effective public transport links. A primary school and a local centre will be provided as part of the Proposed Development, and access to existing community facilities and services will be maintained and enhanced through both options for the Proposed Development. The site location has good and easy access to Stafford, which is located approximately 2km to the south. In addition, the proposals seek to alleviate current traffic congestion issues along the local highways through enhanced transport routes and unfettered access. The Proposed Development positively seeks to ensure new development is integrated into the existing public transport network with good cycling, pedestrian linkages and bus services, which would promote the use of sustainable modes of transport. In addition, improved public transport and

Sustainability Objective	Option A Score	Option B Score	Commentary
			cycling/walking provision will be provided through the Proposed Development. Extended and connected quality bus corridors to and from the site are proposed to provide connection to the wider area. This, together with the provision of safe pedestrian and cycle routes through the site, and also safe crossings at relevant road junctions, would encourage sustainable travel and help to reduce the reliance upon private cars for local journeys. In addition, it would be ensured that traffic on site is managed and speeds are restricted to 20mph in accordance with current guidance. In order to further encourage reduced dependency upon private car use, a Travel Plan will be prepared to encourage sustainable transport. It will also incorporate safe routes to school to promote and encourage walking, cycling, public transport use and car sharing amongst new residents. In addition, provision for "work from home" will be considered, for example sufficient telephone points for internet access. The Proposed Development promotes outdoor recreation opportunities through the provision of communal greenspaces throughout the site, thereby indirectly contributing to opportunities to improve health and wellbeing.
To reduce and prevent crime and reduce the fear of crime	√	√	In order to ensure the safety of the future residents, it is the intention that the Proposed Development will adhere to the principles of Secured By Design and the principles of passive surveillance in order to minimise crime.
To reduce the impact of noise and light pollution	√	√	The Proposed Development has been assessed to ensure an adequate protection against noise. The assessment concluded that with the use of appropriate mitigation measures the acceptable noise levels will be achieved. A lighting design will be undertaken as part of the detailed design and implemented in accordance with relevant British Standards and best practice techniques to ensure that appropriate lighting installation are used. Lighting will only be installed where necessary to prevent unnecessary use /wastage of energy. There is potential for low-level lighting to be used around the boundaries to the north and east, or directional lighting, in order to limit light spill and glare.
To improve health, safety and well-being across the whole community	√	√	Both options for the Proposed Development would indirectly contribute to improved health and promote healthy lifestyles for local residents by incorporating adequate open space and recreational areas, based upon the well-known links between health and access to nature and open spaces. A high level of communal green space is proposed within the site. The site is well connected to surrounding areas and is easily accessible to Stafford by walking and cycling linkages which, together with the aims to deliver extended and connected quality bus corridors to and from the site as well as ensuring connectivity of the site to the town centre and local employment zones by means of bicycle, would encourage the use of sustainable modes of travel and therefore associated increased physical fitness and health benefits. The provision of new homes that meet the Code for Sustainable Homes and the Lifetime Homes Standard would contribute to improving the quality of Stafford's housing stock, which would offer indirect health benefits.
To create a sense of community identity and belonging	√√	√√	Both options for the Proposed Development would positively contribute to the achievement of this sustainability objective. The provision of high quality and affordable housing, a primary school, a local centre, enhanced environmental quality, greenspace provision and increased accessibility would generate improved aspirations, social wellbeing and an inclusive community. It is the intention that the proposed housing will create an individual mix of housing to generate a distinct identity to the site, whilst maintaining the local character, thereby reinforcing a sense of place and individuality.
To ensure tolerance, respect and engagement with people from different	√	√	Although there are no direct links between the Proposed Development and this objective, it would be supported indirectly by continuing to ensure community involvement (e.g. public consultations) in the design of the development to ensure all needs are met.

Sustainability Objective	Option A Score	Option B Score	Commentary
cultures, backgrounds and beliefs recognising their rights and responsibilities			
To ensure all individuals and groups in society have the opportunity to effectively engage in issues relating to their community	√√	√√	Consultation has been undertaken to inform the proposals with a public exhibition in 2012 and 2013 and a consultation report (*Akzo Nobel UK Ltd and Maximus Strategic Land, Consultation Report, Beaconside, Stafford, Pegasus Group Limited, Reference: Bir.2908, October 2013) prepared.* The key issues raised were in relation to increased traffic and impacts on local facilities such as schools. Both options of the Proposed Development aim to address these issues through promotion of sustainable modes of transport and appropriate access and infrastructure. In addition, the Proposed Development incorporates a school thereby benefiting the local community. It will be ensured that the community continue to be engaged, including involvement (e.g. public consultations) in the design of the development to ensure their needs, ideas and knowledge are taken into account to improve the quality and acceptability of the development.
To encourage a strong, inclusive, community and voluntary sector	√√	√√	Both options for the Proposed Development would generate positive indirect benefits upon community spirit. The provision of high quality and affordable housing, a primary school, a local centre, enhanced environmental quality, greenspace provision and increased accessibility would positively contribute to the achievement of this objective through improved aspirations and social wellbeing, thereby helping to ensure an inclusive community. In addition community cohesion could be improved as community involvement is continued. For example, it would continue to be ensured that the community are involved during the detailed design stage (e.g. through public consultations) to ensure their needs, ideas and knowledge are taken into account to improve the quality and acceptability of the development.
To engender a sense of civic and neighbourhood values, responsibility and pride	√√	√√	The provision of high quality and affordable housing, enhanced environmental quality, greenspace provision and increased accessibility would generate improved aspirations and community pride. It is the intention that the proposed housing will create an individual mix of housing to generate a distinct identity to the site, whilst maintaining the local character, thereby reinforcing a sense of place and individuality. In order to ensure that access to community facilities and employment opportunities around the site are maintained, and the community has sense of ownership, the Proposed Development provides for the creation of linkages within and around the site. Road access will also be enhanced to reduce congestion and delays within the area, and therefore improve connectivity and amenity.
Environmental			
To reduce societal contributions to climate change	√√	√√	The creation of a large scale residential development, including the provision of a primary school, has the potential to contribute to higher levels of greenhouse gas emissions through increased private car use, particularly as the area currently suffers from congestion problems. However, both options for the Proposed Development include commitments to enhance and promote the use of sustainable modes of transport, which would reduce dependency upon private car use, and also enhance the existing road network to facilitate the movement of traffic and alleviate congestion. Both options for the Proposed Development would incorporate sustainable construction and design principles in order to minimise energy use and maximise energy efficiency. The residential development will meet Code For Sustainable Homes which sets out targets for energy efficiency and the integration of renewable energy, through a combination of on-site renewable energy provision and energy savings (details are unavailable at this stage). Achieving the Code will therefore help to reduce CO_2 emissions through reduced energy consumption and increased use of renewable energy sources. If necessary, and where feasible, energy feasibility studies will be undertaken at the detailed design stage and Code for Sustainable Homes assessment. The vast majority of the Proposed Development site lies within Flood Risk 1 (low risk), which is land designated as having less than a 1 in 1000 year

Sustainability Objective	Option A Score	Option B Score	Commentary
			annual probability of river or sea flooding (<0.1%) in any year. However, hydrological modelling undertaken indicates that there are small areas of the Site designated as Flood Zone 2 (medium risk) (between a 1 in 100 and a 1 in a 1000 year annual probability of river and sea flooding in any year), Flood Zone 3a (high risk) (1 in 100 or greater probability of flooding) and Flood Zone 3b (High risk) (1 in 20 probability of flooding). However, sensitive development (such as residential properties and schools) will be located within Flood Zone 1 only, outside of Flood Risk Zones 2 and 3. In addition, in order to ensure that potential flood risk is taken into account, the use of sustainable drainage systems (SuDS) will be incorporated where possible. An appropriate attenuation and drainage strategy will be incorporated into the detailed design. The attenuation on site will also reduce surface water runoff and help alleviate flooding downstream. In addition, residential development proposed through both options for the Proposed Development would cumulatively increase waste generation and put pressure on existing waste management infrastructure. However, sustainable waste management will be ensured. The application of Code for Sustainable Homes should lead to a progressive reduction in waste generation and encourage greater levels of re-use and recycling. During construction, in order to minimise waste to landfill, site waste will be reduced through careful planning, ordering, recycling, reusing and reducing waste as far as possible.
To protect and enhance biodiversity	√√	√√	Both options for the Proposed Development could potentially lead to a loss of biodiversity resources though land-take in Greenfield areas. However, the proposals directly seek to maintain and enhance biodiversity and protect existing natural habitats. The Master Plan options provide planting, green linkages and areas of open space, and in addition make a commitment to delivering further biodiversity benefits through habitat creation, which will be detailed in a Landscape Strategy to be developed for the detailed design stage. Habitats identified on site have a range of ecological significance, and include grassland habitats, hedgerows, tall ruderal vegetation, wetland, wetland margins and mature trees. Surveys to determine the actual, inferred or potential presence of protected species were undertaken in 2013. These surveys have confirmed there are no Great Crested Newts (*Triturus cristatus*) present. Bat species use the Site for foraging and roosting, an outlier badger (*Meles meles*) sett is also present. In addition, breeding and wintering bird species were identified on Site, although, given the arable agricultural use of the Site, the optimal breeding habitat is limited and constrained to hedgerows, trees and scrub habitat. Suitable mitigation will be implemented to ensure the protection of these species, and creation of additional suitable habitat throughout the Site will be implemented where possible. The existing ponds will be retained, with aquatic marginal planting to improve the biodiversity, and wherever possible existing trees and hedgerows, and other notable habitat types, on the site will be retained, protected and enhanced. Trees with potential for roosting bats will be surveyed prior to removal (if required) to ensure bat roosts are protected and or removed under an appropriate licence. The hedgerows are a key design driver of the Site and have informed the layout and orientation of the Proposed Development. The hedgerows offer opportunity to maintain connectivity across the Site for both bats and badgers. Bat boxes on existing and newly planted trees can also provide additional habitat for bats. The Proposed Development will also provide for the provision of Suitable Alternative Natural Greenspace (SANGS). An assessment of suitable SANGS provision has identified that 10ha for Option A and 14ha for Option B is considered appropriate to offset potential impacts in relation to the Cannock Chase SAC.
To protect and conserve soil	√	√	The land within Option A is proposed as a strategic development area for housing in the emerging Local Plan ('The Plan for Stafford Borough'). The additional land incorporated within Option B is currently not located within an allocated area for development. Both options for the Proposed Development would result in the permanent loss of agricultural land (some of which is classed as the best and most versatile) albeit some of which will be used for open space and landscaping. However, in order to ensure the most effective and efficient use of land, and to mitigate the loss of soil resources, it is proposed that the surplus resources on site will be used in the detailed design of gardens, buffer zones, and amenity and open spaces. In addition surplus soils will be disposed of thereafter in a sustainable manner. A key principle of the Masterplan options is to reduce the development's footprint/building envelope and in doing so provide significant community open

Sustainability Objective	Option A Score	Option B Score	Commentary
			space. The proposal uses existing topography in order to influence and inform the layout of the development.
To protect and enhance water quality of the Borough's rivers whilst maximising their carrying capacity and achieving sustainable water resource management	√√	√√	Both options for the Proposed Development are located within Greenfield land, and therefore could lead to pollution of local watercourses through increased runoff. However, the proposals seek to mitigate against increased runoff from new development, which would reduce any pollution risks. To ensure that any development on site does not adversely impact upon local public or private water supply through polluting aquifers or groundwater, SuDS will be incorporated wherever possible. Assessment of the technical feasibility of infiltration SUDS and the extent of their application will occur at the detailed design stage once site investigation data is available. In addition the Proposed Development would lead to an increase in demand for water resources. However, the proposals will ensure sustainable construction and design. Code for Sustainable Homes will be met in order to ensure the most efficient use of natural resources, to reduce the overall consumption of clean water for non – potable uses, and to manage the run off from the site. Specific details of the measures to reduce water consumption are unknown at this stage. A sustainable water efficiency strategy that does not impact upon the critical levels required for agricultural purposes during peak demand period of summer months could be developed, if necessary.
To protect, enhance and, where necessary, restore designated landscape areas and town character, scenic beauty, local distinctiveness, and historic and cultural character.	√	√	Both options for the Proposed Development would result in a permanent change in the local landscape, as development would occur on Greenfield land, and a number of receptors would experience visual intrusion. It would therefore need to be ensured that development would be integrated into the local landscape, primarily through careful consideration of the retention and enhancement of the existing soft landscape. The mix of proposed housing and open spaces will create an individual mix of housing that will bring a distinct identity to the site, reinforcing a sense of place and individuality, whilst clearly defining public and private spaces. Development considerations and opportunities for mitigation, to reduce potential impacts, would be similar for both options due to their similarity in size. The main consideration of development would be the encroachment into and development of the countryside (an area of Greenfield land) by built form and urban expansion. Option B would have a slightly greater visual encroachment due to the extended boundary to the north although there is strong potential to limit this through careful design. For example, the inclusion of public green space within the northern area of Option B would mean that development of Option B would not result in significantly greater landscape and visual effects than development of Option A only. The location of intervening topography and vegetation limits many views, particularly from the south, again potentially reducing the visual effect of development of both options. Option B would generally have more significant effects than Option A due to its slightly increased area, although offers potential to provide improved connections to the countryside and opportunity to create a high quality urban fringe development. There are not likely to be considerably more adverse effects resulting from development of Option B than from the development of Option A. To ensure that the landscaping scheme is attractive and appropriate to the local environment, the proposals include for a landscape buffer zone around the perimeter of the site and a secondary landscape filter in the form of trees/landscaping planted throughout the development. In addition, existing hedgerows and other ecological features would be retained where possible. There are also opportunities to enhance the biodiversity of the area by planting mixed native species throughout the development and creating green infrastructure corridors that connect off-site, and improve the connectivity of the site to Stafford and the surrounding Public Rights of Way network. A lighting design will be undertaken as part of the detailed design and implemented in accordance with relevant British Standards and best practice techniques to ensure that appropriate lighting installation are used. Lighting will only be installed where necessary to prevent unnecessary use /wastage of energy. There is potential for low-level lighting to be used around the boundaries to the north and east, or directional lighting, in order to limit light spill and glare. The site has the potential to retain a range of archaeological assets from the Medieval and Post-Medieval periods, particularly to the north-west where the site is in close proximity to the deserted Medieval settlement of Merstone (Marston). However, due to continuing cultivation of the Site, it is likely that any below-ground archaeological assets that do survive within the Site are likely to be in a deteriorated state of preservation. In order to ensure

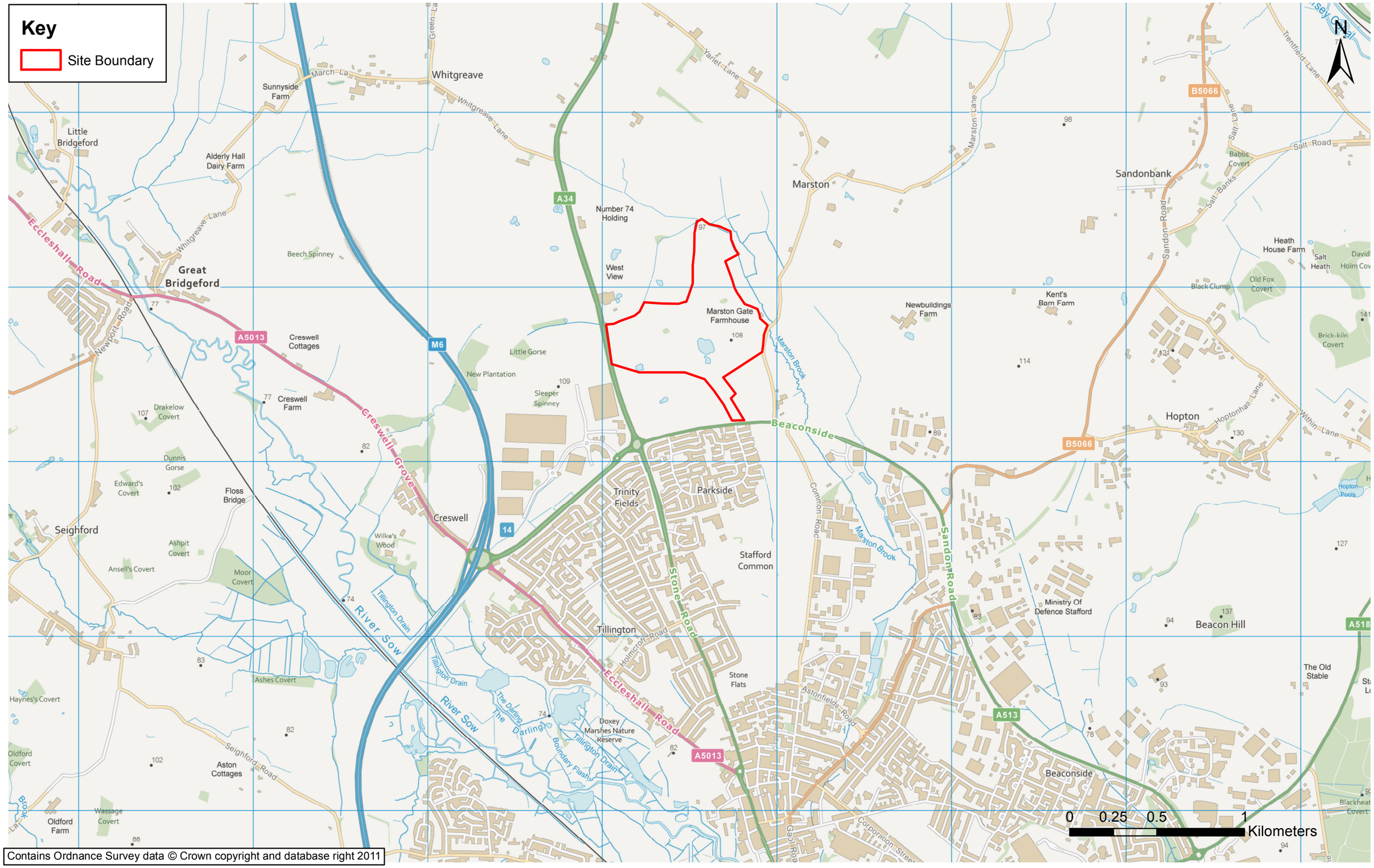
Sustainability Objective	Option A Score	Option B Score	Commentary
			that archaeologically important features are preserved if present, appropriate mitigation measures will be implemented prior and or during construction to mitigate for any potential findings.
Economic			
To create high, stable and equitable levels of employment	√	√	Both options for the Proposed Development would create a large number of temporary construction opportunities. In addition, a small number of permanent employment opportunities will be created in association with the provision of a primary school and a local centre. The Proposed Development will involve the loss of working farm land. However, the farm business tenant does not rely solely upon the Site and would therefore stay in business after the development of the land.
To ensure high and stable levels of economic diversity and competitiveness that recognises social and environmental issues	√	√	There are no direct links between the Proposed Development and this objective. However, the proposals for good quality housing, a primary school, public open space and improvement to the local road network and sustainable transport could lead to increased investment. The town centre may also benefit from the Proposed Development. In addition, the aims of the Proposed Development to deliver a solution to existing highway capacity constraints, and to deliver a sustainable transport package and improved accessibility, will facilitate the growth of sustainable local economies. As the Proposed Development is located near to existing employment areas such as the Prologis Park to the west, these enhanced links will provide increased connectivity to job opportunities for future residents.
To sustain the vitality and viability of Stafford Borough's towns and villages, and their communities	√	√	Both options for the Proposed Development would contribute to regeneration initiatives through their proposals for good quality housing, a primary school, a local centre, public open space and improvement to the local road network and sustainable transport. This would attract new residents to the area which in turn could lead to increased investment, facilitate regeneration and create a place people want to work and live. The town centre may also benefit from the Proposed Development.
To support the needs of the local rural economy and communities	**0**	**0**	The Proposed Development will involve the loss of working farm land. However, the farm business tenant does not rely solely upon the Site and would therefore stay in business after the development of the land.
To reduce vulnerability to the effects of climate change such as risk flooding, on public well-being, the economy and the environment	√√	√√	As discussed above, both options for the Proposed Development would contribute to the achievement of this objective. The commitments to enhance and promote the use of sustainable modes of transport, and also enhance the existing road network would contribute to a reduction in greenhouse gases in the long-term. In addition sustainable construction and design principles will be incorporated in order to minimise energy use and maximise energy efficiency. The vast majority of the Proposed Development site lies within Flood Risk 1 (low risk), which is land designated as having less than a 1 in 1000 year annual probability of river or sea flooding (<0.1%) in any year. However, hydrological modelling undertaken indicates that there are small areas of the Site designated as Flood Zone 2 (medium risk) (between a 1 in 100 and a 1 in a 1000 year annual probability of river and sea flooding in any year), Flood Zone 3a (high risk) (1 in 100 or greater probability of flooding) and Flood Zone 3b (High risk) (1 in 20 probability of flooding). However, sensitive development (residential properties and schools) will be located within Flood Zone 1 only, outside of Flood Risk Zones 2 and 3. In addition, the use of SuDS will be incorporated where possible. Furthermore, the required attenuation for the site will reduce surface water runoff and help alleviate flooding downstream.

Figure 1 – Site Location

Site Location Plan

Scale @ A3 :1:20,000

Figure 1



PROJECT: Land North of Stafford
PROJECT No: 31242
Client: Akzo Nobel UK Ltd.

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