



The Plan for Stafford Borough Part 2–

Examination Statement

– Issue 2 –

Sustainability Appraisal (SA) and Habitats Regulation Assessment (HRA)

June 2016

Issue 2: Sustainability Appraisal (SA) and Habitats Regulation Assessment (HRA)

2.1 *Is PSB2 supported by the SA and HRA?*

- 2.1.1 The Plan for Stafford Borough Part 2 has been subject to a Sustainability Appraisal (P2-A19) which incorporates the requirements of a Strategic Environmental Assessment. The purpose of the Sustainability Appraisal is to help establish the best approach to development amongst all reasonable alternatives. Appraising the social, environmental and economic effects of all potential strategies and policies in the new Local Plan will ensure that decisions are made that accord with the principles of sustainable development, as defined in the National Planning Policy Framework.
- 2.1.2 A Sustainability Appraisal framework was prepared in 2007 (P2-G25), which identifies relevant sustainability objectives for the Borough and facilitated an assessment during the preparation of the adopted Plan for Stafford Borough (P2-C1), through a series of Sustainability Appraisal reports, namely: The Plan for Stafford Borough 2011-2031 Sustainability Appraisal Report June 2014 (P2-C10) and The Plan for Stafford Borough 2011-2031 Sustainability Statement (P2-C11).
- 2.1.3 The Plan for Stafford Borough Part 2: Proposals (P2-G1) was accompanied by the Plan for Stafford Borough Part 2 – Proposals Sustainability Report (P2-G21) and The Plan for Stafford Borough Part 2- Publication (P2-A1) was accompanied by the Plan for Stafford Borough Part 2 – Publication Sustainability Report (P2- B4). Two consultation responses were received on the Publication Sustainability Report (P2-B4). A summary of these, and the Council's response can be found at Appendix 4 of the Sustainability Appraisal (P2-A19), which was updated in March 2016 to take into account the comments received.
- 2.1.4 Natural England has confirmed that the Plan for Stafford is not required to meet the Habitat Regulation Assessment (see below).

Date: 13 July 2015
Our ref: 155583/155561
Your ref: Pt2 Local plan



Stafford Borough Council
For the attention of Alex Yendole

BY EMAIL ONLY

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Dear Alex

Planning consultation:

1. **Stafford Borough Local Plan – Consultation on Part 2 of the plan (Part 2 proposal document)**
2. **Plan for Stafford Borough Part 2 Proposal – Sustainability Appraisal**
3. **Plan for Stafford Borough Part 2 Proposal – Habitats Regulations Assessment (HRA)**

Thank you for your consultation on the above dated 02 June 2015 which was received by Natural England on the same day.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Stafford Borough Local Plan – Consultation on Part 2 of the plan (Part 2 proposal document)

Natural England acknowledges the context for this consultation as set out in the introduction to the consultation document (paragraphs 1.1-1.5) and defined in paras 1.6-1.8. We have considered the content of the Part 2 proposal document (including the questions posed by the Council) in relation to those themes within our remit and taking account of the adopted 'Plan for Stafford Borough' (PfsB - effectively the Part 1 document). As the PfsB has addressed those themes in our remit in a strategic way our consideration of the Part 2 proposals has focused on clarifying any aspects of detail that warrant further advice. Taking account of the adopted PfsB we are pleased to advise that we have identified no aspects that need further clarification and we have no objections to the proposed policy wordings set out in the document.

Plan for Stafford Borough Part 2 Proposal – Sustainability Appraisal (SA)

Natural England acknowledges and agrees with the SA report conclusion and recommendations.

Plan for Stafford Borough Part 2 Proposal – Habitats Regulations Assessment (HRA)

Thank you for your separate consultation letter of 4 June 2015 on this subject.

Natural England notes the local plan circumstances described in your letter:

“...the adopted Plan for Stafford Borough 2011-2031 (June 2014) was subject to the Habitat Regulations Assessment process. The adopted Plan contains specific Environmental policies to address issues raised in the Habitat Regulations Assessment.

The Borough Council have now prepared the Plan for Stafford Borough Part 2 document. This document sets out settlement boundaries for Stafford, Stone and the Key Service Villages, together with boundaries for recognised industrial estates. However, as a result of recent planning consents in these areas and progress on a number of Neighbourhood Plans, which have individually addressed Habitat Regulations Assessment requirements, no significant new development is proposed within these boundaries.”

We agree with the Council’s conclusion that at this ‘Part 2 – Proposals’ stage of the Stafford Borough Local Plan the need for further Habitats Regulations Assessment can be screened out i.e. no further HRA is required. The Council should keep a record of this correspondence to evidence its thought process and our advice.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact me on 0300 060 1640. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely

Antony Muller
Lead Adviser – Sustainable Development and Wildlife Team – North Mercia Area

2.2 Do any adverse effects identified in the SA require significant mitigation, and how does PSB2 address these issues?

2.2.1 The Sustainability Appraisal March 2016 (P2-A19) concludes in section 5 the following:

Objective	Paragraph	Summary
Economic	5.8	"The Plan for Stafford Borough Part 2 is not likely to have any negative effects on the economic objectives".
Social	5.14	"No negative effects are identified from the policies or boundaries in relation to the social objectives".
Environmental	5.21 and 5.22	<p>"Policy SB1 has a potential minor negative effect in relation to noise and light pollution as a result of overall increased levels of development within the settlements including new housing, employment and mixed uses. Although negative effects would be mitigated by the existing Plan Policy N1 Design, new development will inevitably result in an overall minor negative effect in relation to this objective, particularly during construction of any new homes and employment development".</p> <p>"Negative effects are also identified in relation to the protection and conservation of soil (SA objective 13), as Policies SB1, SB3 and RIE1 result in the loss of greenfield sites in the majority of settlements. SB3 is likely to also have a negative impact on biodiversity (SA objective 12) in the Borough due to the potential loss of viable habitat through employment development. The impact of new development is also likely to result in potential negative effects on the water environment, although Policies N2 Climate Change and N4 Natural Environment and Green Infrastructure in the adopted Plan for Stafford Borough provide mitigation to reduce these negative effects".</p>

- 2.2.2 The minor negative effects identified relate primarily to the environmental effects of growth, and the impacts of new housing and employment land, predominantly on greenfield sites.
- 2.2.3 The Plan for Stafford Borough Part 2 (P2-A1) at paragraph 1.2 makes clear that this part of the Plan should be read in conjunction with the adopted Plan for Stafford Borough. The adopted Plan for Stafford Borough includes a range of policies which will influence the decisions made in relation to the implementation of development within these sites, reducing potential negative effects.
- 2.2.4 Due to the nature of the effects identified and the existing policies in place to mitigate such effects, there are no recommendations from the Sustainability Appraisal of the Plan for Stafford Borough Part 2 (P2-B4) which suggest that any more reasonable alternatives should have been selected.