

Sustainability Appraisal (SA) of the New Stafford Borough Local Plan 2020-2040

Interim SA Report

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Quality information

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Non-technical Summary (NTS)

AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging New Stafford Borough Local Plan (“the Local Plan”).

Once in place, the Local Plan will establish a spatial strategy for growth and change over the period 2020 to 2040, allocate sites to deliver the strategy and establish the policies against which planning applications will be determined.

SA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to minimising adverse effects and maximising the positives.

The Local Plan is at an early stage of preparation, with an ‘Issues and Options’ consultation document currently published for consultation, and this Interim SA Report published alongside.

Structure of the Interim SA Report

SA reporting essentially involves answering the following questions in turn:

1) What has plan-making / SA involved **up to this point?**

- including in relation to ‘reasonable spatial strategy alternatives’.

2) What are the SA findings **at this stage?**

- i.e. in relation to the emerging plan.

3) What happens **next?**

Each of these questions is answered in turn below. Firstly there is a need to set the scene further by answering the question ‘What’s the scope of the SA?’

What is the scope of the SA?

The scope of the SA is reflected in a list of topics and objectives, which, taken together indicate the parameters of the SA and provide a methodological ‘framework’ for assessment. In short, the SA scope covers:

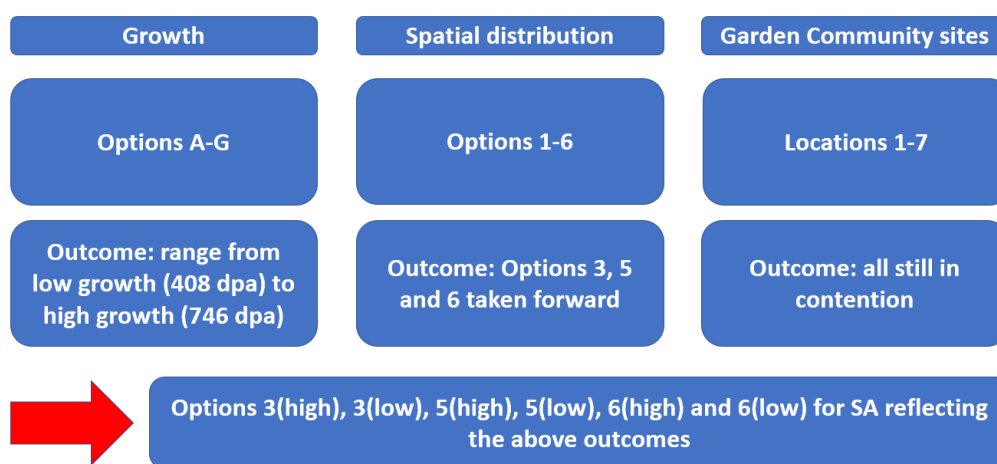
- Air quality
- Biodiversity
- Climate change adaptation
- Climate change mitigation
- Economy and employment
- Health
- Historic environment
- Housing
- Land, soils and waste
- Landscape
- Population and communities
- Transport
- Water resources and water quality

Plan-making / SA up to this point

The focus of the current Regulation 18 consultation, and the focus of the appraisal presented within this Interim SA report, is a series of Strategic Options, or ‘reasonable spatial strategy alternatives’ at this stage of plan-making. This involves identifying and testing alternative approaches to growth both in terms of overall quantum of growth and distribution of this growth across the Borough. As such, the role of the first ‘part’ of this report is to explain the process of arriving at the reasonable spatial strategy alternatives as identified at this stage.

The first step was to review the range of potential housing need scenarios being consulted on and establish two growth poles, i.e. a high growth scenario and a low growth scenario. The next step was to explore the different potential spatial distribution options for dispersing growth across the Borough’s settlements. The final step was to review strategic (or ‘top down’) and site / area specific (or ‘bottom up’) issues and options both in terms of potential New Garden Communities options and at a settlement specific scale. Careful consideration of these different elements informed the establishment of a single set of Borough-wide reasonable spatial strategy alternatives, based on assumptions and understandings at this stage of the plan-making process. See Figure NTS.1 below:

Figure NTS.1: Selecting the reasonable spatial strategy alternatives (Strategic Options)



This process led to the development of the following reasonable spatial strategy alternatives at this stage:

Table NTS.1: The reasonable spatial strategy alternatives (Strategic Options) at this stage of plan-making

Tier	Settlement	Option 3 Disperse growth across the settlement hierarchy		Option 5 Option 3 PLUS at least one New Garden Community		Option 6 Focus growth at transport corridors PLUS at least one New Garden Community	
		High growth	Low growth	High growth	Low growth	High growth	Low growth
Tier 1	Stafford	5,349	2,203	3,549	403	3,549	403
Tier 2	Stone	1,337	551	887	101	887	101
Tiers 3 - 6	Elsewhere	2,229	918	1,479	168	1,479	168
n/a	New Garden Community	0	0	3,000	3,000	3,000	3,000
Total homes		8,915	3,672	8,915	3,672	8,915	3,672

It is important to note that although Option 5 and Option 6 propose delivering the same quanta of growth at each tier of the settlement hierarchy they remain conceptually distinct. This is because the distribution of this growth at each tier will be aligned with each Option’s spatial principles, namely dispersed growth under Option 5 and transport corridor-focussed growth under Option 6.

What are the SA findings at this current stage?

Part 2 of this report answers the question – What are SA findings at this current stage? – by presenting an appraisal of the reasonable spatial strategy alternatives under the ‘SA framework’ that was established through scoping.

Summary appraisal findings are presented in Table NTS.2 below. In respect of the methodology: Within each row of the table (i.e. for each of the topics that comprise the ‘backbone’ of the SA framework) the columns to the right hand side seek to both A) rank the alternatives in order of relative performance (1 – 6); and B) categorise the performance of each option in terms of ‘significant effects’ (using **red** / **green**).

Table NTS.2: Summary appraisal conclusions in relation to the reasonable spatial strategy alternatives

Objective	Rank of preference and significant effects					
	Option 3 (high)	Option 3 (low)	Option 5 (high)	Option 5 (low)	Option 6 (high)	Option 6 (low)
Air quality	2	★1	4	3	6	5
Biodiversity	2	★1	2	★1	2	★1
Climate change adaptation	6	5	4	3	2	★1
Climate change mitigation	3	3	★1	2	★1	2
Economy and employment	2	2	★1	2	?	?
Health and wellbeing	★1	★1	★1	★1	2	2
Historic environment	2	★1	2	★1	2	★1
Housing	★1	2	3	4	5	6
Land and soils	2	★1	4	3	6	5
Landscape	2	★1	4	3	6	5
Population and communities	★1	2	★1	2	3	3
Transport	2	★1	4	3	6	5
Water	4	3	2	★1	2	★1

Concluding discussion on the Strategic Options:

The appraisal finds that significant positive effects are anticipated for all options with regards to the SA theme of housing by delivering, in full, against the minimum housing requirement over the plan period. Options 3(low), 3(high), 5(low) and 5(high) are also considered likely to deliver significant positive effects with regards to the SA theme of economy and employment by distributing new employment floorspace across the Borough. The ability to deliver significant positive effects for the economy and employment SA theme under Options 6(low) and 6(high) however are less certain given the direction of growth away from existing economic and educational hubs.

Potential significant negative effects have been identified for all options with regards to the SA theme of land and soils. This reflects greenfield development as an aspect of all options (given a lack of available brownfield sites) and potential losses of high-quality agricultural land and mineral resources. Across all options these appear to be inevitable consequences of growth in the Borough.

The appraisal shows Option 3(low) to perform well in respect of the greatest number of objectives, and also to result in significant positive effects in respect of the greatest number of objectives. However, it does not necessarily follow that Option 3(low) is best performing, or 'most sustainable' overall, recognising that the sustainability objectives are not assigned any particular weight. It will be for the decision-maker (Stafford Borough Council) to assign weight and trade-off between the competing objectives ahead of establishing a preferred approach.

What are the next steps?

Part 3 of the report answers the question – *What happens next?*

Preparation of the Draft Plan

Subsequent to the current consultation it is the intention to prepare a preferred option / draft plan and publish that plan for consultation. A second Interim SA Report will be prepared and published alongside. It will be structured in three parts, as per this current Interim SA Report, except that Part 1 will deal solely with the matter of exploring reasonable alternatives, whilst Part 2 will present an appraisal of the Draft Plan.

Preparation of the Proposed Submission Plan

Subsequent to the draft plan consultation the Council will prepare and publish the proposed submission version of the plan in-line with Regulation 19 of the Local Planning Regulations 2012. The proposed submission plan will be that which the Council believes is 'sound' and intends to submit for Examination. The final SA Report will be published alongside the Proposed Submission Plan, providing the information required by the SEA Regulations 2004. The SA Report will be structured as per the preceding Interim SA Report.

Submission and examination

Once the period for representations on the Proposed Submission Plan / SA Report has finished the main issues raised will be identified and summarised by the Council, who will then consider whether in-light of representations received the plan can still be deemed 'sound'. If this is the case, the Plan will be submitted for Examination, alongside a statement setting out the main issues raised during the consultation. The Council will also submit the SA Report.

At Examination the Inspector will consider representations (alongside the SA Report) before then either reporting back on the Plan's soundness or identifying the need for modifications. If the Inspector identifies the need for modifications to the Plan these will be prepared (alongside SA) and then subjected to consultation (with an SA Report Addendum published alongside).

Once found to be 'sound' the Plan will be formally adopted by the Council. At the time of Adoption a 'Statement' must be published that sets out (amongst other things) 'the measures decided concerning monitoring'.

1. Introduction

Background

- 1.1 AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging New Stafford Borough Local Plan (“the Local Plan”). Once in place, the Local Plan will establish a spatial strategy for growth and change for the period 2020 to 2040, allocate sites to deliver the strategy and establish the policies against which planning applications will be determined. The new Local Plan will replace the adopted Plan for Stafford Borough 2011-2031, which comprises the following documents:-
- Part 1 of the Plan for Stafford Borough (2014) which contains a vision, spatial principles and specific policies which will guide development across the Borough; and
 - Part 2 of the Plan for Stafford Borough (2017) which details settlement and Recognised Industrial Estate boundaries together with a policy protecting community / social facilities.
- 1.2 SA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to minimising adverse effects and maximising the positives. It is a legal requirement that Local Plans are subject to SA.¹

SA explained

- 1.3 It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which were prepared in order to transpose into national law the EU Strategic Environmental Assessment (SEA) Directive. In-line with the Regulations, a report (known here as **the SA Report**) must be published for consultation alongside the draft plan that essentially ‘identifies, describes and evaluates’ the likely significant effects of implementing ‘the plan, and reasonable alternatives’. The report must then be taken into account, alongside consultation responses, when finalising the plan.
- 1.4 More specifically, the SA Report must answer the following **three questions** -
- What has Plan-making / SA involved up to this point?
 - including with regards to consideration of ‘reasonable alternatives’
 - What are the SA findings at this stage?
 - i.e. in relation to the draft plan
 - What are next steps?

This Interim SA Report

- 1.5 The Council is currently consulting on ‘Issues and Options’ for the emerging plan. This ‘Interim’ SA Report is therefore produced with the intention of informing the consultation and subsequent preparation of the draft plan.

Structure of this report

- 1.6 Although this is an ‘Interim’ SA Report, and does not need to provide the information required of the SA Report, it is nonetheless helpful to structure this report according to the three questions above. Before answering the first question, there is a need to further set the scene by answering two initial questions:
- What is the plan seeking to achieve?
 - What is the scope of the SA?

¹ Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (NPPF, 2019). The Town and Country Planning (Local Planning) Regulations 2012 require that an SA Report is published for consultation alongside the ‘Proposed Submission’ plan document

2. What is the Plan seeking to achieve?

Introduction

2.1 The aim here is to explain more fully the context to plan preparation and the plan vision / objectives.

Legislative and policy context

2.2 The Local Plan is being prepared under the Town and Country (Local Planning) Regulations 2012. The plan must reflect current government policy as set out in the National Planning Policy Framework (NPPF, 2019) and Planning Policy for Traveller Sites (2015), and must also be mindful of the Government's online Planning Practice Guidance (PPG). In particular, the NPPF requires local authorities to take a positive approach to development, with an up-to-date local plan that meets objectively assessed development needs, including local housing needs (LHN), as far as is consistent with sustainable development.

2.3 The plan is also being prepared taking account of objectives and policies established by various organisations at the national and more local levels, in accordance with the Duty to Cooperate (established by the Localism Act 2011). For example, context is provided by the strategic policies of:

- Staffordshire County Council (i.e. Minerals and Waste policies);
- Government's environmental agencies, namely the Environment Agency, Historic England and Natural England.

2.4 Stafford Borough Council must also cooperate with neighbouring authorities, particularly the immediately adjacent authorities of Cannock Chase, East Staffordshire, Lichfield, Newcastle-under-Lyme, South Staffordshire, Staffordshire Moorlands, Stoke-on-Trent, Shropshire and Telford and Wrekin.

2.5 Additionally, the Council must engage constructively with other relevant bodies including Stafford and Surrounds Clinical Commissioning Group (CCG) and Stoke-on-Trent and Staffordshire Local Enterprise Partnership (LEP).

2.6 Finally, it is important to note that the plan will be prepared mindful of any 'made' or emerging Neighbourhood Development Plans in the Borough. There are currently five 'made' NDPs within Stafford Borough and a further four NDPs at various stages of preparation. NDPs must be in 'general conformity' with the Local Plan, which means that made and emerging NDPs may need to be reviewed to bring them into line with the emerging plan; however, it is equally the case that made and emerging NDPs will be a consideration when preparing the Local Plan.²

The plan area

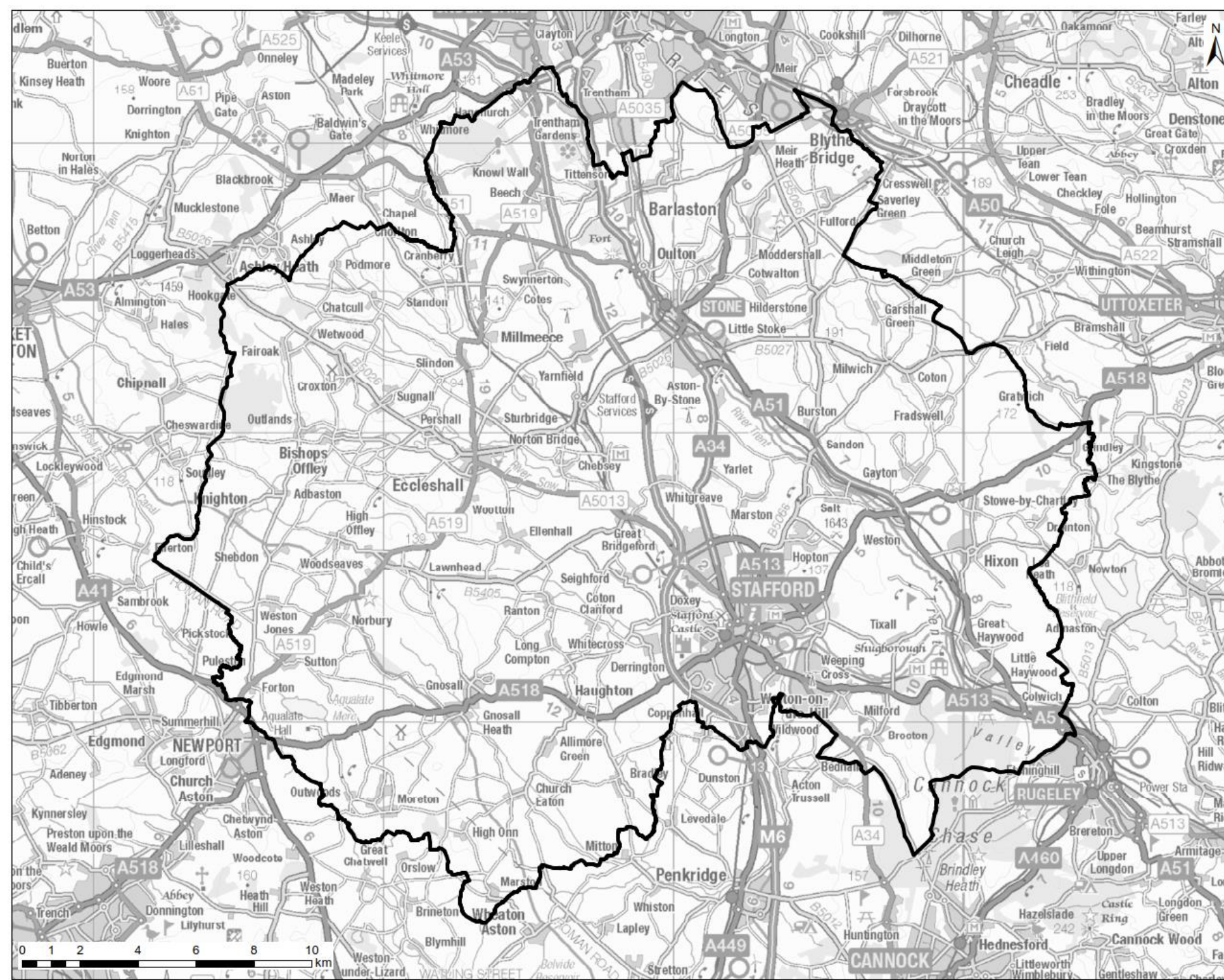
2.7 Section 2 of the draft Issues and Options consultation document (the Consultation Document) includes a detailed narrative discussion introducing the Borough via a 'spatial portrait', which explains that:

"Stafford Borough is centrally located within the County of Staffordshire within the West Midlands Region. It lies between the North Staffordshire Conurbation to the north, comprising of Stoke-on-Trent and Newcastle-under-Lyme, and the Birmingham City Region to the south.

The Borough is predominantly rural in nature covering approximately 230 square miles. It has two main town centres (Stafford and Stone) that act as hubs to the rural hinterlands. The Borough is very well connected with excellent transport links to the rest of the Country. Although the Borough is relatively self-contained, there are key economic linkages with the North Staffordshire Conurbation and the Birmingham City Region".

2.8 See Figure 2.1 below for a map of the plan area.

² Ministry of Housing, Communities & Local Government (2019) Neighbourhood Planning Guidance [online] available at: <https://www.gov.uk/guidance/neighbourhood-planning--2>



The context provided by the adopted Local Plan

2.9 The adopted Plan for Stafford Borough 2011-2031 includes an expansive vision, with separate vision statements for Stafford Borough as a whole, Stafford town and for Stone. These are summarised below:

2.10 By 2031 Stafford Borough will have:

- retained and enhanced its high quality unique character; provided high quality designed developments; a range of housing types and tenures to meet the needs of the Borough; reduced the need to travel; addressed issues of climate change, including a reduction of carbon emissions and flood risk; improved accessibility to services and facilities; been protected, conserved and enhanced to provide an exceptionally high quality of environmental, historic and landscape character; supported Neighbourhood Plans; delivered new development on brownfield land where possible.

2.11 By 2031 the County Town of Stafford will have:

- provided an enhanced national and regional profile through major new housing and employment developments supported by a range of new infrastructure provision; achieved a strengthened and diverse economy; increased educational attainment at all levels and retained high quality graduate skills; significant levels of high quality housing including affordable and specialist housing; major town centre investments and exceptional levels of accessible community services and facilities; provided new green infrastructure / biodiversity enhancement schemes.

2.12 By 2031 the market town of Stone will have:

- conserved and enhanced the local character of the town and its canal side vistas; a vibrant local economy and community activities; an increased mix of high quality residential developments supporting first class business development; provided new green infrastructure / biodiversity enhancement schemes; delivered a range of new housing at selected villages; avoided development in flood risk areas; increased the availability of accessible and enhanced high quality services and facilities, including public transport provision; provided new green infrastructure / biodiversity enhancement schemes; supported a diverse and regenerated rural economy.

2.13 This vision is supported by 28 objectives. The Consultation Document notes that the vision and objectives are now “*considered to be too long*” and that “*the New Local Plan should be guided by a new vision that is shorter and focussed on the aspects that the plan will seek to deliver over the period 2020-2040*”.

Vision and objectives of the New Local Plan

2.14 In this context, the Issues and Options Consultation Document presents the following key and recurring themes to help focus thinking around the development of a new more concise vision and objectives for the New Local Plan:

- “Need for high quality design and architecture to create a strong sense of place and community;
- Stafford to provide an enhanced service centre and tourism destination;
- Town centres to provide a quality environment and accommodate specialist shops and flexibility of uses;
- Recognise and address issues associated with climate change and global warming;
- General support for the utilisation of renewable energy sources and ensuring low carbon via, wind, geothermal, solar and hydropower all being cited as possible alternative sources of energy;
- Future proofing development via the use of technology (e.g. Artificial Intelligence, vehicle charging points, recycled / grey water etc...)”.

What is the Plan not seeking to achieve?

2.15 There is a need to be clear that the Local Plan will be strategic in nature, and hence naturally omit consideration of some detailed issues, in the knowledge that they can be addressed at subsequent stages of the planning process, for example at the planning application stage. The strategic scope of the Local Plan is reflected in the scope of the SA.

3. What is the scope of the SA?

Introduction

- 3.1 The scope of the SA refers to the breadth of sustainability issues and objectives that are taken into account as part of the appraisal of reasonable spatial strategy alternatives and the emerging plan.
- 3.2 The aim here is to introduce the reader to the *broad scope* of the SA. However, it is not possible to define the scope of the SA comprehensively. Rather, there is a need for the SA scope to be flexible and adaptable, responding to the nature of emerging preferred and alternative plan options, and the latest evidence-base.

Consultation on the scope

- 3.3 The Regulations require that: “*When deciding on the scope and level of detail of the information that must be included in the Environmental Report [i.e. the SA scope], the responsible authority shall consult the consultation bodies*”. In England, the consultation bodies are the Environment Agency, Historic England and Natural England.³ As such, these authorities were consulted on the SA scope in 2017 through the Sustainability Appraisal Scoping Report, with the responses received used to inform this initial SA report.
- 3.4 In 2019 AECOM produced a summary of the responses received to the SA Scoping Report and suggested changes (see Appendix B). In light of this, SBC took the decision to reduce the number of SA objectives from 20 to 13, which resulted in the revised SA Framework set out in Table 3.1 below.

Key issues and objectives

- 3.5 Table 3.1 presents the sustainability topics and objectives that are the ‘backbone’ to the SA framework.

Table 3.1 The SA framework

Theme	SA Objectives
Air quality	<p>Take action to reverse the trend for increasing emissions by supporting and enabling the use of low emission technologies and actively encouraging sustainable modes of transport such as walking and cycling, particularly where it is possible to leverage the opportunities presented by new development.</p> <p>Locate and design development so that current and future residents will not regularly be exposed to poor air quality; notably the M6 motorway around Stafford and Clayton.</p>
Biodiversity	<p>Minimise, and avoid where possible, impacts to biodiversity, both within and beyond designated and non-designated sites of national and local significance.</p> <p>Achieve biodiversity net gain including through the long term enhancement and creation of well-connected, functional habitats that are resilient to the effects of climate change.</p>
Climate change adaptation	<p>Adapt to current and future flood risk by directing development away from the areas of the Borough at the highest risk of flooding from all sources.</p> <p>Provide sustainable management of current and future flood risk through sensitive and innovative planning, development layout and construction.</p>
Climate change mitigation	<p>Continue to drive down CO₂ emissions from all sources by achieving high standards of energy efficiency in new development, by providing attractive opportunities to travel by sustainable means and by protecting land suitable for renewable and low carbon energy generation, including community schemes.</p>

³ In-line with Article 6(3) of the SEA Directive, these bodies were selected because ‘by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes.’

Economy and employment	<p>Ensure that education and skills provision meet the needs of the Borough's existing and future labour market and improve life chances for all.</p> <p>To create high, stable and equitable levels of employment and competitiveness that recognises social and environmental issues, enhancing the vitality of the Borough's town and villages.</p> <p>Support the needs of the local rural economy.</p> <p>To ensure that sufficient supporting/enabling infrastructure of the right type is available in the right places and at the right time to support growth and innovation.</p> <p>Increase the availability of high speed broadband especially in the villages and isolated properties and all new build properties.</p>
Health and wellbeing	<p>Improve opportunities for access for all to work, education, health and local services</p> <p>Improve the physical and mental health and wellbeing of Stafford Borough residents, including through enhancing existing health, sports, and leisure facilities and reducing health inequalities between local communities across the Borough.</p> <p>To reduce the impact of noise and light pollution; including potential traffic noise pollution.</p>
Historic environment	<p>Protect, conserve and enhance heritage assets, including their setting and significance, and contribute to the maintenance and enhancement of historic character through design, layout and setting of new development.</p>
Housing	<p>Support timely delivery of an appropriate mix of housing types and tenures, including a focus on maximising the potential from strategic brownfield opportunities, to ensure delivery of high quality, affordable and specialist housing that meets the needs of Stafford Borough's residents, including older people.</p>
Land, soils and waste	<p>Promote the efficient and sustainable use of land and natural resources, including supporting development which makes effective use of previously developed land and avoids the best and most versatile agricultural land where applicable.</p> <p>Support the County objectives for the sustainable management of minerals and waste.</p>
Landscape	<p>To protect, enhance and, where necessary, restore the Borough's designated landscape areas and town character, scenic beauty and local distinctiveness, through appropriate design and layout of new development, including the preservation of the Cannock Chase Area of Outstanding Natural Beauty (AONB) and key views.</p>
Population and communities	<p>Sustain and enhance the vitality and viability of Stafford Borough's towns and villages, and their communities through supporting good access to existing and planned services, facilities and community infrastructure, including green infrastructure, for new and existing residents, mindful of the potential for community needs to change over time.</p> <p>Locate development in areas that can support accessibility improvements, reducing deprivation within communities across the Borough.</p> <p>Improve safety within communities throughout the Borough; reducing and preventing crime and reducing the fear of crime</p> <p>Create a sense of community identity, belonging and pride; encouraging community engagement in local issues, and a strong voluntary sector.</p> <p>Ensure tolerance, respect and engagement with people from different cultures, backgrounds and beliefs recognising their rights and responsibilities.</p>
Transport	<p>Ensure that the provision of infrastructure is managed and delivered to meet local population and demographic change whilst helping to reduce congestion and travel times. This includes providing infrastructure that maximises accessibility for all and connects new housing developments to employment, education, health and local services, including public realm.</p>
Water resources and water quality	<p>Promote sustainable forms of development which minimises pressure on water resources, water consumption and wastewater flows, including the use of innovative features and techniques where possible, to maintain and enhance water quality of the Borough's rivers and aquifers; consistent with the aims of the Water Framework Directive.</p>

Part 1: What has plan-making / SA involved up to this stage?

4. Introduction to Part 1

- 4.1 The aim of this part of the report is to explain the reasons for arriving at the reasonable spatial strategy alternatives ('Strategic Options') that are a focus of the current consultation. In doing so, the aim is to present "an outline of the reasons for selecting the alternatives dealt with", in accordance with regulatory requirements.⁴

Whose responsibility?

- 4.2 It is important to be clear that: selecting reasonable spatial strategy alternatives is the responsibility of the plan-maker, namely Stafford Borough Council; appraising the reasonable spatial strategy alternatives is the responsibility of the SA consultant, namely AECOM; and selecting the preferred option is the responsibility of the plan-maker.

Strategic options in respect of what?

- 4.3 There are a range of important choices to be made in respect of the Local Plan but particularly in respect of housing including with regard to the type, size, tenure mix and design. However, a key choice to be made through any Local Plan is in respect of spatial strategy, i.e. the question of *how many* homes should be delivered and *where* in the local authority area. It is this matter that tends to generate a high degree of interest as part of Local Plan-making, reflecting the fact that a decision on spatial strategy leads to clear 'on the ground' impacts, both positive (e.g. focused development in one area can facilitate upgrades to local infrastructure) and negative (e.g. development can lead to tensions with environmental and character / heritage objectives).⁵
- 4.4 It follows that it is reasonable for the Strategic Options to deal with the **spatial strategy**, i.e. to comprise alternative approaches to planning for a deliverable housing land supply sufficient to meet housing needs.

N.B. the intention is to maintain a focus on alternatives in respect of the spatial strategy as part of SA work undertaken subsequent to this current consultation / prior to preparing the Proposed Submission Plan; however, there will also be the potential to define and appraise alternatives in respect of other matters addressed through the plan, e.g. employment land and development management priorities. Views on potential issues for which alternatives could be explored are very welcome.

⁴ Schedule 2(8) of the Environmental Assessment of Plans and Programmes (SEA) Regulations 2004

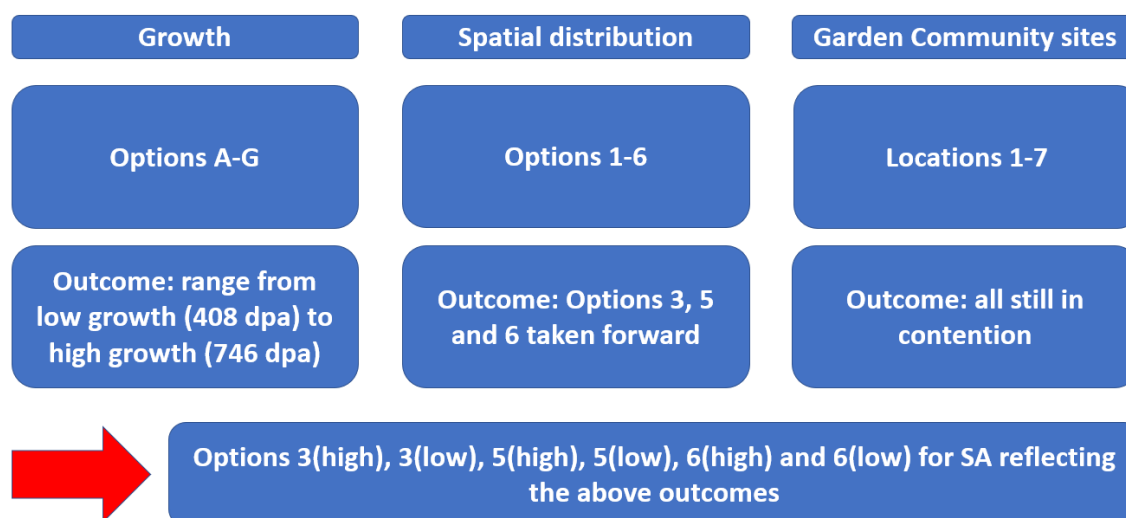
⁵ It follows that it is decision-making in respect of the spatial strategy that is most likely to generate 'significant effects' on the sustainability baseline (in respect of the sustainability objectives that comprise the SA framework - see Table 3.1). The PPG is clear that SA "should only focus on what is needed to assess the likely significant effects of the plan".

5. Selecting the Strategic Options

Overview

- 5.1 The legal requirement is to explore reasonable alternatives “*taking account of the objectives ... of the plan*”⁶ hence there is a need to explore only strategic options that arguably (recognising that this is not an exact science) align with the emerging Local Plan aims and objectives discussed above.
- 5.2 The Council is at an early stage in exploring strategic issues / options alongside issues / options associated with potential Garden Community sites in the Borough, before drawing upon this understanding to arrive at overall reasonable strategic options. Figure 5.1 summarises the process:

Figure 5.1 Selecting the reasonable spatial strategy alternatives at this stage



Strategic issues and options

- 5.3 The first step in the process of seeking to select reasonable strategic options involved the consideration of ‘top down’ strategic issues / options in terms of:
- Quantum – how many additional new homes should the Local Plan Review provide for? Includes consideration of:
 - Different potential economic scenarios for likely future growth in the Borough.
 - Distribution – which broad areas within the Borough are more suited and less suited to growth? Includes consideration of:
 - Settlement hierarchy;
 - Green Belt;
 - Cannock Chase AONB (impacts on the AONB and its setting);
 - Conceptual distribution options.

⁶ N.B. the legal requirement applies to the Local Plan-making / SA process as whole, as opposed to SA work completed at the Regulation 18 stage of Local Plan-making. The key legal requirement is to explore reasonable alternatives ahead of finalising the Proposed Submission Plan for publication under Regulation 19 of the Local Planning Regulations.

Quantum

5.4 The government's standard methodology for calculating housing need indicates a minimum annual housing need for Stafford Borough of **408 dwellings per annum (dpa)**. However, Planning Practice Guidance (PPG) is clear that "*the standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area*" (our emphasis).⁷ Therefore, it is appropriate to explore the potential for delivering higher growth through the New Local Plan.

Economic scenarios

5.5 In this context, the Consultation Document presents six economic scenarios identified through the 2019 Stafford Borough Economic and Housing Development Needs Assessment (EHDNA), each of which results in a different housing need calculation which could potentially be applied in the New Local Plan.

5.6 In addition, the EHDNA calculates both a 'base' annual housing need figure under each of the six scenarios (based on the 2014 Sub National Housing Projections) **and** a higher figure based on 'Partial Catch Up' (PCU) rates. The Consultation Document explains that the PCU method "*rebalances the household formation rates to reflect the accelerated rates of young people who are able to form household since the end of the recession*". All permutations of the EHDNA are summarised in Table 5.1 overleaf.

Table 5.1 Potential economic scenarios and corresponding housing need, as per the Stafford EHDNA (2019)

Scenario	Details	Housing need (dpa)	
A: Standard Method	Based on the Government's standard methodology 2019-2029 as defined by the 2019 PPG.	408	
B: Baseline 2014	Utilises the 2014-based Sub National Population Projections (SNPP) and headship rates from the Government's CLG 2014-based Sub National Household Projections (SNHP).	349 (base)	404 (PCU)
C: Mid-Year Estimates (MYEs) 2017	Applies the same assumptions as Scenario A but utilises the 2017 Mid-Year Estimates to adjust the starting position to the latest population position.	324 (base)	381 (PCU)
D: Cambridge Econometrics (CE) baseline	This considers the implications of achieving the net job growth set out in the CE baseline forecasts (c. 5,920 jobs over the period 2020-2040).	435 (base)	489 (PCU)
E: Jobs growth – policy on	Considers a regeneration scenario which includes the growth projected to occur at a potential New Garden Community and Stafford Station Gateway, around 12,500 new jobs.	647 (base)	711 (PCU)
F: Past trends jobs growth	Projecting forward the Compound Average Growth Rate (CAGR) job growth of 0.83% achieved between 2000 and 2018 in Stafford Borough over the 2020-2040 plan period.	683 (base)	746 (PCU)
G: Jobs growth – jobs boost	Based on the CE baseline forecast with net growth increased by 50% accommodated above existing CE baseline (resulting in a total job growth of c. 8,900).	540 (base)	597 (PCU)

⁷ HM Government (2019), Planning Practice Guidance Paragraph: 010 Reference ID: 2a-010-20190220 [online], available: <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

- 5.7 Recognising that the standard methodology represents a minimum housing requirement, not a cap, the Consultation Document states that Scenarios B and C are not considered further as they would not deliver sufficient development to enable Stafford Borough to meet its minimum objectively assessed housing needs.
- 5.8 Therefore, annual housing need for Stafford Borough over the plan period of 2020 - 2040 is identified as falling within a range between **408 dpa** and **746 dpa** (i.e. the standard methodology calculation under economic scenario A as the lowest figure and the PCU rate under economic scenario F as the highest figure). This equates to a total housing need figure of between **8,160 dwellings** and **14,915 dwellings** over the plan period.
- 5.9 However, the adopted Plan for Stafford Borough has a plan period which runs to 2031 and allocates sites to deliver growth over this period. In this context the Consultation Document makes an assumption that over the period to 2031 a 'discount' to the total housing need figure will be provided as existing allocations are built out, reducing the residual need to be met through the New Local Plan. Under this scenario, there is a **total residual need** of between **3,672 dwellings** and **8,915 dwellings** over the plan period to 2040.

Broad distribution

- 5.10 The distribution of this housing growth over the plan period will be informed by a range of strategic considerations, summarised in turn below.

Settlement hierarchy

- 5.11 The Consultation Document notes that the adopted settlement hierarchy has not delivered balanced growth across the Borough, attributing this to "*slow take off of strategic sites*" at Stafford and Stone, whilst acknowledging that "*some of the Key Service Villages have received a disproportionate amount of housing*". In effect, a more dispersed pattern of growth than intended has occurred in recent years. Additionally, the adopted settlement hierarchy does not explicitly recognise urban areas at the north of the plan area, which function as part of the greater Stoke-on-Trent urban area but fall within the administrative boundaries of the Borough.
- 5.12 Consequently, a new settlement hierarchy is proposed, based on the Settlement Assessment (2018) and the subsequent 2019 update. The proposed new settlement hierarchy to be taken forward in the New Local Plan is presented in Table 5.2 below.

Table 5.2 Proposed Settlement Hierarchy 2019

Tier	Category	Settlements	Description
1	Principal settlement	Stafford (<i>including Baswich, Berkswich, Walton-on-the-Hill</i>)	Largest urban area in the Borough with a regionally significant service centre role providing employment, retail and other facilities, and a key role in driving growth.
2	Market town	Stone	Second largest town in the Borough providing employment, retail and other facilities for a wider area.
3	North Staffordshire Urban Area	Clayton; Meir Heath / Rough Close; Blythe Bridge	Built areas in the north of the Borough at the southern fringe of the Stoke-on-Trent urban area.
4	Large settlements	Eccleshall; Gnosall; Great Haywood; Hixon; Little Haywood; Colwich	Large villages of 500 or more dwellings which act as key service centres for the surrounding rural area by virtue of the range of services and facilities they provide.
5	Medium settlements	Brocton; Church Eaton; Derrington; Great Bridgeford; Haughton; Hilderstone; Hyde Lea; Weston; Woodseaves	Villages of 250 or more dwellings which tend to have a lesser provision of services than larger villages that share services with nearby villages.

6	Small settlements	Adbaston; Aston-by-Stone; Bradley; Cold Meece; Cotes Heath; Creswell; Croxton; Hopton; Milwich; Moreton; Norbury; Norton Bridge; Ranton; Sandon; Salt; Seighford	Small villages with a definable nucleus (i.e. not dispersed).
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Green Belt

- 5.13 A total of 18.6% of the plan area is designated as Green Belt. There are two separate areas of Green Belt within the plan area - a portion of the Borough's south falls within the West Midland Green Belt and much of the Borough's northern extent falls within the North Staffordshire Green Belt. A number of settlements are either entirely within or are washed over by the Green Belt, meaning strategic expansion of these settlements will likely not be possible without a revision to the existing Green Belt boundary.
- 5.14 The North Staffordshire Green Belt in particular could have potential implications for the delivery of housing in the Borough as it encircles Stoke-on-Trent and could represent a notable constraint on the capacity of Stoke-on-Trent to meet its housing need. In this context it is considered that there could potentially be a future need for Stoke-on-Trent to explore limited Green Belt release to meet its housing need, which could have implications for the parts of the North Staffordshire Urban.
- 5.15 The Consultation Document notes that, with the exception of the North Staffordshire Urban Area, the proposed settlement hierarchy "*deliberately excludes those settlements in the Green Belt in recognition of the special policy protection that this provides*". Affected settlements are Barlaston; Barlaston Park; Fulford; Swynnerton; Meaford; Oulton; Stallington; Tittensor; Trentham; and Yarnfield.

Cannock Chase

- 5.16 Cannock Chase is a significant feature of the south of the Borough and is subject to a range of natural environment designations, giving the area a range of inherent sensitivities, all of which could have potential to influence the spatial distribution of future development. The most significant of these are considered in turn below:

Special Area of Conservation (SAC)

- 5.17 Cannock Chase SAC is one of the best examples in the UK of European dry heathland and could be significantly adversely affected by recreational pressure from visitors. 75% of visitors to the SAC are from within a radius of 15km, meaning development within 15km will likely introduce additional recreational pressure in the absence of mitigation. Therefore, a 15km Zone of Influence has been established by Natural England and the Cannock Chase SAC Partnership, within which mitigation measures will be sought from new development. An 8km Zone of Payment has been established within which financial contributions to a specific programme of mitigation measures will be sought. See Figure 5.2, below.

Site of Special Scientific Interest (SSSI)

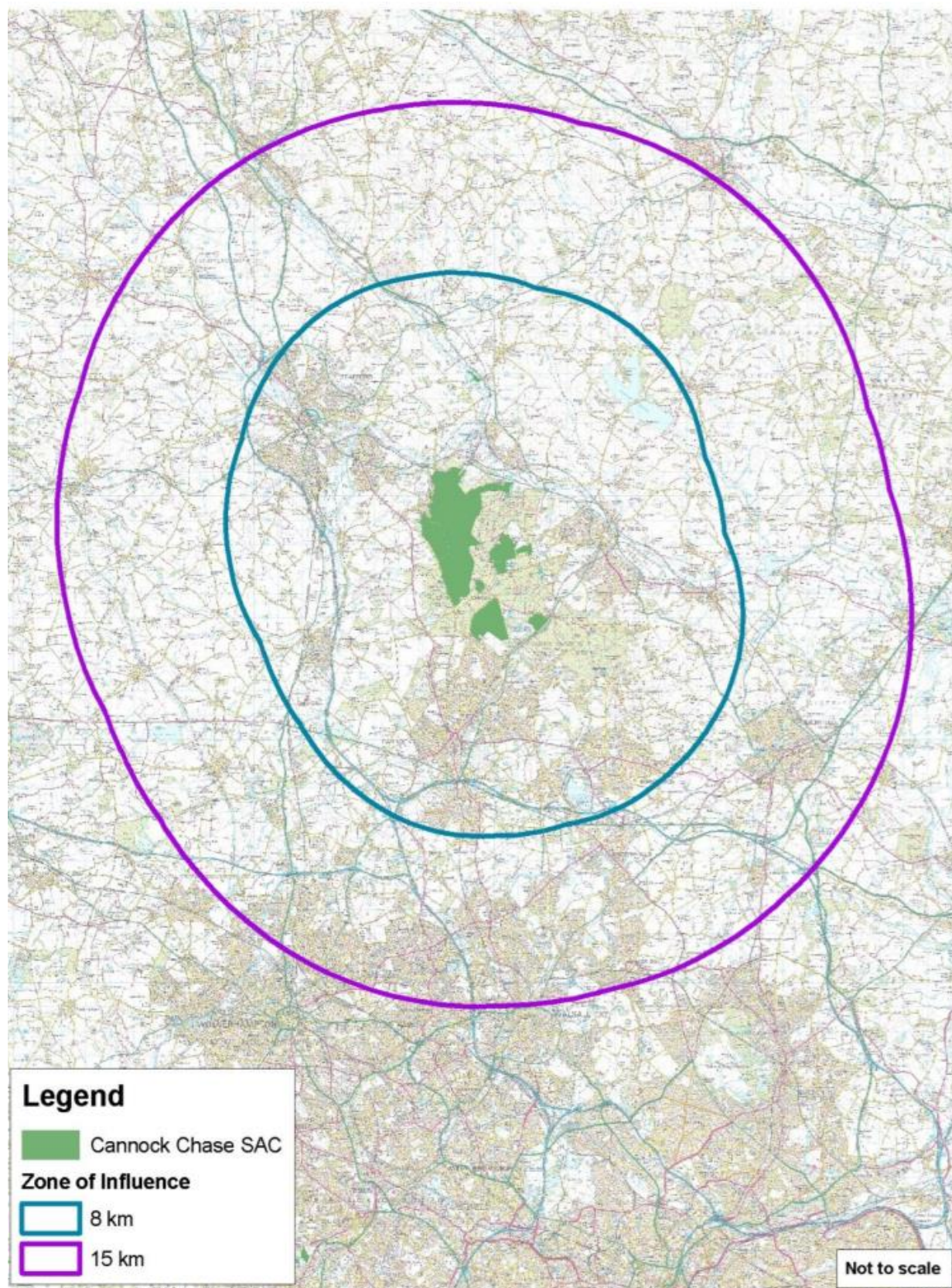
- 5.18 Cannock Chase SSSI is cited for its significance in relation to a wide range of ecologically valuable species and habitats. This includes the dry heathland recognised by the SAC, but also notable populations of species of moths, beetles, deer, bats and reptiles.⁸

Area of Outstanding Natural Beauty (AONB)

- 5.19 The SAC and SSSI both fall within the wider Cannock Chase Area of Outstanding Natural Beauty (AONB) which itself falls within the boundaries of four LPAs (i.e. Stafford Borough, Lichfield, South Staffordshire and the eponymous Cannock Chase District).

⁸ Natural England, 'Designated Sites View – Cannock Chase SSSI' [online], available from: <https://designatedsites.naturalengland.org.uk/PDFsForWeb/Citation/1004497.pdf>

Figure 5.2 Cannock Chase SAC Zones of Influence⁹



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⁹ Cannock Chase SAC Partnership (2017), Memorandum of Understanding of the CCSP Partner Authorities [online]: <https://www.staffordbc.gov.uk/sites/default/files/cme/DocMan1/Cannock%20AONB/SAC%20memorandum%20of%20understanding%2C%20FINAL%2C%202017%20additions.pdf>

New Garden Community issues and options and settlement issues and options

5.20 The second step in the process of seeking to select reasonable spatial strategy alternatives involved the consideration of 'bottom up' place-specific issues/options in terms of:

- New Garden Community options; and
- Settlement options.

New Garden Community options

5.21 The Consultation Document identifies the potential to meet a significant proportion of housing need in the Borough via the creation of at least one sustainable new settlement, or New Garden Community. In order to establish potential locations for delivery of a Garden Community AECOM was commissioned in 2019 to undertake a detailed study of strategic constraints and opportunities in the plan area, identifying seven locations as being potentially suitable. These locations are summarised in Table 5.3 below:

Table 5.3 Potentially suitable locations for a New Garden Community in Stafford Borough

Strategic Growth Options	Gross Site (Hectares)	Net Developable Area (Hectares)	Estimated Homes	Estimated Jobs	Typology
Gnosall North / East	~325	~150	2,750 - 3,500	1,000 - 2,500	Urban Extension
Land between Gnosall & Haughton	~325	~150	2,500 - 3,250	1,000 - 2,500	Co-Dependent
Seighford	~450	~325	4,500 - 5,250	2,500 - 6,500	Co-Dependent
Land North of Redhill	1,000	~300	3,500 - 5,000	2,500 - 6,500	Co-Dependent
Meecebrook	1,125	~650	9,000 - 11,500	8,000 - >15,000	Autonomous
Hixon	~150	~125	2,250 - 2,750	1,000 - 2,500	Urban Extension
Land East of Weston	225	~100	1,750 - 2,000	1,000 - 2,500	Urban Extension

5.22 The Consultation document notes that:

“The largest of the potential options for a Garden Community, Meecebrook, is capable of delivering more than 10,000 new houses and 75ha of employment land along with supporting infrastructure. However, as acknowledged above there is unlikely to be any dwellings completed until at least 2030, during which lead-in-time the Council will still need to ensure a five-year land supply.”

“It would be necessary to ensure that sufficient land is allocated within the Settlement Hierarchy until delivery at the new Garden Community commences. At which point the balance of delivery would shift to the new Garden Community”.

Settlement options

5.23 The council has explored issues and options at a settlement-specific scale in detail through the 2018 Settlement Assessment and Settlement Profiles evidence base work. The assessment examined constraints and opportunities at each settlement in the Borough, and produced a set of detailed settlement profiles for each via a pro forma assessment which captures physical characteristics, accessibility, services and facilities, recent commitments and overall number of dwellings.

- 5.24 This work has a key strategic role in that it helps inform the new settlement hierarchy, though it also plays an important 'bottom-up' function by contributing a detailed settlement-scale understanding of factors which will influence the spatial distribution of growth through the New Local Plan.
- 5.25 This work is published in full on the Council's website.¹⁰

Establishing the reasonable alternatives

- 5.26 In light of the above, it is clear that the reasonable spatial strategy alternatives will have both a quantum and a spatial dimension. This is because it is appropriate to explore both alternative quanta of housing growth and alternative distributions of this growth.

Potential distribution options

- 5.27 The Council has developed six potential strategic distribution options. These are broad conceptual options at this stage in that none are supported by specific sites.
- 5.28 These six distribution options are listed below:
- Option 1: Focus growth at Stafford and Stone only;
 - Option 2: Focus growth at Stafford, Stone and the Large Settlements (business as usual);
 - Option 3: Disperse growth across the settlement hierarchy;
 - Option 4: Focus growth at new Garden Communities only;
 - Option 5: Disperse growth across the settlement hierarchy plus a New Garden Community;
 - Option 6: Focus growth at settlements linked by existing transport corridors.
- 5.29 The Consultation Document explores all six options, concluding that:

"of the six growth options discussed, which represent the possible reasonable alternatives for Stafford Borough, three (Options 1, 2 and 4) could be considered contrary to the NPPF. As such they are considered less appropriate and are proposed to be discarded".

- 5.30 Therefore, a shortlist comprising the three remaining options are proposed for testing through the SA, with the Consultation Document explaining that:

"Options 3, 5 and 6 are considered NPPF-compliant and provide a potential spatial basis for the development the new Stafford Borough Local Plan 2020-2040".

- 5.31 Options 3, 5 and 6 are summarised overleaf.

Option 3 – disperse development across the hierarchy

- 5.32 This option would look at allocating development across all the settlements identified in the new settlement hierarchy with the greatest levels of growth directed at Stafford (Tier 1) and Stone (Tier 2). A range of medium and small sites would need to be allocated in these two towns alongside larger allocations.
- 5.33 As the North Staffordshire Urban Areas (Tier 3) are constrained by the Borough boundary and the North Staffordshire Green Belt, no new land would be allocated in this area for development. Settlement boundaries will be drawn around these urban areas to allow infill and redevelopment of existing stock.
- 5.34 Some Large Settlements (Tier 4) experienced high levels of growth during the Plan for Stafford Borough 2011-2031. Therefore, to re-address this imbalance, growth may be limited in some of these settlements through smaller allocations.
- 5.35 In Medium (Tier 5) and Small Settlements (Tier 6) some growth would be expected. This would allow for some limited growth proportionate to the size of a village and its services.

¹⁰ Stafford Borough Council (2018), 'Settlement Assessment' [online], available at: <https://www.staffordbc.gov.uk/sites/default/files/cme/DocMan1/Planning%20Policy/New%20Local%20Plan%20Settlement%20Assessment%20and%20Profiles/Appendix%20B%20-%20The%20Settlement%20Profiles%20July2018.pdf>

Option 5 – disperse development across the new settlement hierarchy plus at least one New Garden Community

5.36 Similar to Option 3, this option would look at allocating development across all the settlements identified in the new settlement hierarchy as well as at least one New Garden Community (see paragraph 5.16)

Option 6 – concentrate development within existing transport corridors / clusters of communities

5.37 This Option seeks to maximise the benefit of the existing transport network and other infrastructure. It looks to maximise the potential for new infrastructure development by building within and adjacent to the larger settlements, their connecting transport corridors and the associated settlements. This Option has the potential for significant extension of communities or even new Garden Communities within those corridors.

5.38 The Consultation Document identifies that corridors / clusters which could be considered include:

- Gnosall – Haughton – Stafford (A518);
- Barlaston – Tittensor – Stone – Aston-by-Stone – Stafford (A34 / M6);
- Croxton – Eccleshall – Great Bridgford – Cresswell – Stafford (B5026 / A5013)
- Stone – Weston – Hixon – Great Hayward – Little Hayward (A51)
- Norbury – Woodseaves – Eccleshall – Norton Bridge – Stone (A519 / B5026)

5.39 This Option would require a mixture of large and smaller sites in order to enable the achievement of the authority's rolling five-year land supply and NPPF compliance. Furthermore it would be likely to additionally require development within the main towns and other larger settlements within the settlement hierarchy.

Selection/ rejection of distribution options

5.40 The Council has concluded that Options 1, 2, and 4 may be considered contrary to the NPPF. As such they are considered less appropriate options for delivering Stafford Borough's housing need over the plan period and are proposed to be discarded.

5.41 The other three Options (Options 3, 5 and 6) are considered NPPF-compliant and provide a potential spatial basis for the development of the new Stafford Borough Local Plan 2020-2040, either individually or in combination.

Conclusion on the reasonable alternatives

5.42 Based on the above, three reasonable alternative distribution options emerge at this stage of plan-making, i.e. Option 3, Option 5 and Option 6.

5.43 Additionally, the Consultation Document is clear that five economic scenarios remain under consideration, which could each deliver a range of different quanta of housing (i.e. as per economic scenarios A, D, E, F and G). In order to test different quanta of growth under each of the three distribution options it is helpful to explore high growth and low growth under each distribution option.

5.44 Therefore, a **total of six reasonable alternative spatial strategies** have been identified at this stage of the plan-making process to be tested through the SA:

- **Option 3 (high):** High growth – dispersed
- **Option 3 (low):** Low growth – dispersed
- **Option 5 (high):** High growth – dispersed plus Garden Community
- **Option 5 (low):** Low growth – dispersed plus Garden Community
- **Option 6 (high):** High growth – transport corridors plus Garden Community
- **Option 6 (low):** Low growth – transport corridors plus Garden Community

- 5.45 Growth under each of the options is outlined in Table 5.4 below. It is important to note that although Option 5 and Option 6 propose delivering the same quanta of growth at each tier of the settlement hierarchy they remain conceptually distinct. This is because the distribution of this growth at each tier will be aligned with each Option's spatial principles, namely dispersed growth under Option 5 and transport corridor-focused growth under Option 6 (as per paragraphs 5.32 – 5.39 above).

Table 5.4 The reasonable spatial strategy alternatives (Strategic Options) at this stage of plan-making

Tier	Settlement	Option 3 Disperse growth across the settlement hierarchy		Option 5 Option 3 PLUS at least one New Garden Community		Option 6 Focus growth at transport corridors PLUS at least one New Garden Community	
		High growth	Low growth	High growth	Low growth	High growth	Low growth
Tier 1	Stafford	5,349	2,203	3,549	403	3,549	403
Tier 2	Stone	1,337	551	887	101	887	101
Tiers 3 - 6	Elsewhere	2,229	918	1,479	168	1,479	168
n/a	New Garden Community	0	0	3,000	3,000	3,000	3,000
Total homes		8,915	3,672	8,915	3,672	8,915	3,672

A note on Partial Catch Up rates (PCUs) and 'discounting' existing commitments

- 5.46 It is noted that in addition to proposing alternative levels of housing growth under the different economic scenarios, the Consultation Document also identifies two potential models of population projection (one which trends-forward the headship rates in the 2014-based household projections and a second which includes an uplift called a 'Partial Catch Up rate').
- 5.47 Additionally, the Consultation Document identifies potential for the New Local Plan to either meet identified need in absolute terms over the plan period or, alternatively, apply a 'discount' of 6,000 dwellings to whichever need figure is settled upon to account for completions and commitments made through the adopted Plan for Stafford Borough during the 'overlap' period to 2031.
- 5.48 Although the choice of whether or not to apply a PCU rate and / or a 'discount' to the Plan's housing need figure introduces additional variables in terms of the quanta of homes to be delivered, they do not have an explicit bearing on the spatial choices which the New Local Plan must make. For simplicity, this appraisal applies an assumption in relation to both variables. First, it is assumed that a Partial Catch Up rate is engaged as this will ensure a higher level of growth, and therefore effects of a greater magnitude, are tested. Second, (as discussed at paragraph 5.9) it is assumed that a 'discount' is applied to housing need, to effectively allow for completions and commitments between the New Local Plan base date of 2020 and the end of the plan period of the adopted Plan for Stafford Borough in 2031.

Part 2: What are SA findings at this current stage?

6. Introduction to Part 2

- 6.1 The aim of this part of the report is to present an appraisal of the reasonable spatial strategy alternatives at this stage.

Appraisal methodology

- 6.2 For each of the reasonable spatial strategy alternatives, the assessment identifies / evaluates 'likely significant effects' on the baseline, drawing on the sustainability topics / objectives identified through scoping (see Table 3.1) as a methodological framework.
- 6.3 **Green highlight** is used to indicate likely significant positive effects, whilst **red highlight** is used to indicate likely significant negative effects. Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the policy approaches under consideration. The ability to predict effects accurately is also limited by understanding of the baseline (now, and in the future under a 'no plan' scenario). In light of this, there is a need to make considerable assumptions regarding how reasonable spatial strategy alternatives would be implemented 'on the ground' and what the effect on particular receptors would be. Where there is a need to rely on assumptions in order to reach a conclusion on a likely effect, this is made explicit in the appraisal text.
- 6.4 Where it is not possible to predict likely significant effects on the basis of reasonable assumptions, efforts are made to comment on the relative merits of the reasonable spatial strategy alternatives in more general terms and to indicate a **rank of preference**. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of 'significant effects'.
- 6.5 Finally, it is important to note that effects are predicted taking account of the criteria presented within the SEA Regulations (Schedules 1 and 2). For example, account is taken of the duration, frequency and reversibility of effects. Cumulative effects are also considered (i.e. the effects of the plan in combination with other planned or on-going activity).

7. Appraisal of the Strategic Options

7.1 Appraisal findings are presented across 13 sections below, with section dealing with a specific sustainability topic. Each section follows the methodology outlined in paragraphs 6.2 – 6.5 of this report.

Air quality

Option 3 (high)	Option 3 (low)	Option 5 (high)	Option 5 (low)	Option 6 (high)	Option 6 (low)
2	1	4	3	6	5

- 7.2 The current Air Quality Status Report for Stafford Borough (2018) recognises that although Stafford Borough does not have any Air Quality Management Areas (AQMA's), it is still affected by air pollutants.¹¹ The main roads in the Borough such as the M6 motorway, A50, A500 and A34 all generate significant traffic pollution in the form of nitrous oxides and particulate matter.
- 7.3 Motorway and trunk road emissions therefore remain a significant concern for Stafford Borough, and as such, Options 3(high) and 3(low) which seek to focus growth around Stafford and Stone would likely lead to further utilisation of the strategic road network; connecting housing and employment growth, utilising existing links to the M6 corridor and associated A-roads. It is considered that Options 5(high) and 5(low) are likely to lead to similar effects of lesser significance, given growth is also focused at least one New Garden Community under these options.
- 7.4 However it is also recognised that directing growth in line with the new settlement hierarchy through Options 3(high) and 3(low), and to a lesser extent Options 5(high) and 5(low), will ensure that the right proportion of development is directed to the most sustainable settlements with access to sufficient services and facilities to support development. This will subsequently minimise the need to travel by car, and promote active travel and the uptake of sustainable transport; notably forthcoming improvements such as the new High Speed 2 (HS2) rail link.
- 7.5 The delivery of all Options would lead to significant housing growth and commercial investment across the Borough. As such, the local traffic that this growth will generate needs to be properly managed to avoid a significant deterioration in local air quality (notwithstanding likely future emissions reductions as the transition to electric cars accelerates). Options 6(high) and 6(low) perform negatively in this respect through focussing growth along transport corridors, supporting unsustainable settlements low down the settlement hierarchy, as a result of their access to heavily utilised A-roads. As further discussed under the Transport SA theme below, this approach appears to reduce preference for public transport and active travel, resulting in likely reliance on the private vehicle for access to services / facilities in larger settlements.
- 7.6 In terms of the delivery of at least one New Garden Community, depending on location, it may or may not be close to existing sustainable transport corridors. As such it is difficult to come to any definitive conclusions in terms of impact on air quality. However, it is recognised that Garden City principles will be followed; which include high quality design, whilst delivering new infrastructure to meet residents' need. This could result in high levels of self-containment, leading to positive effects in terms of reducing the need to travel and encouraging sustainable travel; which may result in improved local air quality.
- 7.7 In terms of high and low growth options, at this stage it is considered that as the level of growth increases so does the significance of effects, given that higher growth would result in increased vehicles on the roads, increased congestion, and subsequent heightened levels of NO₂ and particulates. Therefore, Options 3(high), 5(high) and 6(high) perform less well than options 3(low), 5(low) and 6(low). However, it is recognised that there is the opportunity for increased growth to deliver mitigation; i.e. through the provision of sustainable transport infrastructure, road improvements, public transport improvements, etc.

¹¹ 2018 Air Quality Annual Status Report <https://www.staffordbc.gov.uk/node/301825>

- 7.8 Overall, Options 3(high) and 3(low), followed by Options 5(high)and 5(low), are best performing against this SA Theme. This is given the focus of growth at high tier settlements that provide the best current and future opportunities for achieving sustainable development; reducing the need to travel by car and subsequently minimising additional impacts on air quality throughout the Borough. These Options contribute positively towards the development of sustainable transport networks, capitalising upon existing transport infrastructure at key locations, and further promoting active travel opportunities. It is noted that levels of self-containment may be higher through Options 5(high) and 5(low) given the delivery of at least one New Garden Community; however as potential Garden Community locations are currently unknown; it is difficult to predict residual effects on the road network and subsequent effects on air quality.
- 7.9 Option 6(high) followed by 6(low) are identified as the least well performing options given the direction of growth away from sustainable settlements. This will inevitably lead to an increased reliance on the car to travel, resulting in heightened levels of NO₂ and particulates, and consequent adverse effects on local air quality.
- 7.10 It is however recognised that there is an element of uncertainty at this stage, given the exact location of growth (notably in relation to potential New Garden Communities) is unknown.

Biodiversity

Option 3 (high)	Option 3 (low)	Option 5 (high)	Option 5 (low)	Option 6 (high)	Option 6 (low)
2	★1	2	★1	2	★1

- 7.11 It is assumed that development proposed under any of the Options would not result in the loss of any international, national or locally designated sites for biodiversity.
- 7.12 Stafford Borough is important for its biodiversity and areas of nature conservation, many of which are internationally and nationally designated sites. The Borough contains four Special Areas of Conservation (SAC) sites (Cannock Chase, Motte Meadows, Chartley Moss and Pasturefields), three RAMSAR sites at Aqualate Mere, Chartley Moss and Cop Mere, and 15 Sites of Special Scientific Interest (SSSIs). The potential for impacts on the European sites is being explored in detail through a stand-alone Habitats Regulations Assessment (HRA).
- 7.13 Development proposed through the Local Plan is most likely to have impacts on the European sites discussed above through atmospheric pollution, increased disturbance (recreation, noise and light), and through impact on water quality and resources. In terms of ranking the Options, it is considered that all Options are constrained to some extent by internationally designated sites; specifically, that all Options have the potential to adversely impact upon the Cannock Chase SAC in the absence of mitigation. The SAC is one of the best examples in the UK of European dry heathland and could be significantly adversely affected by recreational pressure from visitors. 75% of visitors to the SAC are from within a radius of 15km, meaning development within 15km will likely introduce additional recreational pressure in the absence of mitigation. Therefore, a 15km Zone of Influence has been established by Natural England and the Cannock Chase SAC Partnership within which mitigation measures will be sought, while an 8km Zone of Payment has been established within which financial contributions to a specific programme of mitigation measures will be sought.¹² In accordance with Policy N6 of the Local Plan Part 1, “*all development that leads to a net increase in dwellings must take all necessary steps to avoid or mitigate any adverse effects upon the SAC’s integrity.*”

¹² Footprint Ecology (2012) Cannock Chase SAC Mitigation Report [online] available at: <https://www.staffordbc.gov.uk/sites/default/files/cme/DocMan1/Planning%20Policy/Further%20Information%20and%20Evidence/Habitats%20Regulation%20Assessment/Cannock-Chase-SAC-Visitor-Impacts-Mitigation-Report.pdf>

- 7.14 On this basis, Options 3(high), 3(low) which focus growth around Stafford are likely to perform more negatively than other Options, as almost the entirety of Stafford falls within the 8km buffer. Options 5(high) and 5(low) also perform negatively in this respect, however the significance of effects is less as these Options include at least one New Garden Community, and therefore the level of growth directed at Stafford town is reduced. However, it is noted that all Options will include mitigation measures to offset potential adverse effects; as recommended through the Cannock Chase Mitigation Report (2012). Notably, strategic growth provided through Options 5(high), 5(low), 6(high), and 6(low) has the potential to provide Suitable Alternative Natural Green Space (SANGs), largely for walkers and dogwalkers, in locations around the SAC. Positive effects may also be delivered through enhancement measures, including net gain, secured at a strategic scale.
- 7.15 In terms of nationally designated sites, there are 15 Special Sites of Scientific Interest (SSSI) within the Borough, two of which are National Nature Reserves (NNRs). There are also many Sites of Biological Importance (SBI) that are of County significance, and numerous locally designated sites and Local Biodiversity Action Plan habitats (notably ancient species-rich hedgerows and areas of Ancient Woodland). These designated sites are dispersed throughout the Borough, a significant proportion of which coincide with the heathland of Cannock Chase AONB to the south-east of the Borough. In the northwest of Stafford are the woodlands of Hanchurch and Bishop's Wood, and as part of the Meres and Mosses landscape, there are a variety of wetlands in the west of the Borough such as Cop Mere, Loynton Moss and Aqualate Mere. To the east of Stafford Borough is Chartley Moss, Britain's largest example of Floating Bog. On the southern border of the Borough can be found Motte Meadows, one of the best-preserved floodplain meadows in the country. Given the extent of biodiversity present throughout the Borough, it is considered that all Options have the potential to lead to adverse effects on designated sites, most likely a result of increased recreational disturbance, water pollution, and air pollution.
- 7.16 Looking specifically at Stafford town, it is recognised that Doxey and Tillington Marshes SSSI is present to the north east of the town, and that any development to the east of the M6 is within a SSSI Impact Risk Zone (IRZ) for *"any residential development with a total net gain in residential units."* It is therefore considered that development through Options 3(high) and 3(low), and to a lesser extent 5(high), and 5(low) have the potential to lead to negative effects on this designated site.
- 7.17 In addition to designated sites, all Options have the potential to result in adverse effects on biodiversity through loss of greenfield land and priority habitats. Habitat fragmentation is a key issue for the Borough for example, fragmentation of hedgerows caused by development and canalised streams and rivers. In this context, due to the increased level of housing to be delivered in rural locations, effects may be of greater significance under Options 6(high) and 6(low).
- 7.18 However in this context, it is also noted that river corridors through Stafford town are of particular importance locally, providing habitat connectivity throughout the Borough while also supporting recreational provision and walking / cycling links, including canal tow paths to other parts of Stafford as well as links to the open countryside. Options 3(high), 3(low), 5(high), and 5(low) which focus growth around Stafford therefore have the potential to lead to negative effects as discussed above. Options however also have the potential to explore and encourage the wider benefits of ecosystem services in this respect, supporting a net gain in biodiversity. Potential New Garden Communities proposed under Options 5(high), 5(low), 6(high) and 6(low), have the potential to lead to positive effects of greatest significance in this respect; given the scale of development proposed. All potential New Garden Communities are committed to adopting Garden City principles which include innovative environmental solutions; incorporating biodiversity around developments, and supporting the provision of new green infrastructure and habitats in the area through green links, delivering strategic scale connectivity between sites. However the extent to which Garden City principles would be delivered in practice is currently uncertain.
- 7.19 It is noted that Options 6(high) and 6(low) which focus growth along linear road corridors may lead to positive effects through providing habitat corridors; aiding biodiversity networking and wider connectivity. However development under these options also has the potential to lead to negative effects through focussing around 'A' roads with increased road users and therefore increased air pollution from vehicles.

- 7.20 Overall, it is considered that all Options have the potential to adversely impact the Borough’s biodiversity resource, with the potential for residual negative effects. The focus of development in the higher tier settlements will likely result in increased pressure on the environment, due to concentrating growth in locations around the existing main settlements where a number of nationally and locally designated biodiversity sites are located. However, it is also considered that concentrating growth in the urban built up area may lead to reduced greenfield development. A number of the lower tier settlements are also constrained with respect to international/ national level biodiversity designations, and therefore impacts on biodiversity may not be lessened through the delivery of other Options.
- 7.21 The delivery of at least one New Garden Community through Options 5(high), 5(low), 6(high) and 6(low) would have a limited impact on the environment in the areas outside of the potential New Garden Communities. This is particularly important given the rich biodiversity seen throughout the Borough. Nonetheless, overall residual effects of the Options will depend upon the precise location of any New Garden Communities in terms of impact on the Borough’s biodiversity resource (see Appendix 1).
- 7.22 It is also recognised that all Options have the potential to deliver positive effects on biodiversity through enhancement measures secured at the site level, and it is recognised that strategic-scale planning may deliver positive effects of greater significance through Options 5(high), 5(low), 6(high) and 6(low). This is currently uncertain, and therefore at the Borough scale it is difficult to differentiate between the Options.
- 7.23 In terms of high and low growth options, at this stage it is considered that as the level of growth increases so does the potential significance of effects; and therefore Options 3(high), 5(high), and 6(high) perform less strongly. However, it is recognised that there is potential for mitigation measures and biodiversity net-gain to be secured at the site level, which may lead to positive effects against the SA theme, as discussed above. The nature and significance of effects will therefore ultimately be dependent on the exact location, design/ layout of development, the implementation of mitigation measures, and the sensitivity of receptors.

Climate change adaptation



Option 3 (high)	Option 3 (low)	Option 5 (high)	Option 5 (low)	Option 6 (high)	Option 6 (low)
6	5	4	3	2	★1

- 7.24 In terms of climate change adaptation, it is considered that in line with higher level planning policy, the Council will seek to direct development away from areas at highest risk of flooding, as per the sequential test. As set out in the NPPF (2019) *“all plans should apply a sequential, risk-based approach to the location of development - taking into account the current and future impacts of climate change - so as to avoid, where possible, flood risk to people and property”*. It is also assumed that there is suitable mitigation available to ensure that development does not increase flood risk, for example through the delivery of sustainable drainage systems.
- 7.25 In terms of the key watercourses in the Borough and subsequent high fluvial flood risk areas; the River Trent runs through Stone north to south, the River Sow runs through Eccleshall and Stafford, the River Penk extends through the southern area of Stafford, and Meece Brook runs west of Mill Meece and Yarnfield. The Southern Staffordshire Councils Level 1 Strategic Flood Risk Assessment (SFRA) (2019) states that these watercourses and their tributaries present fluvial flood risk at rural communities as well as some of the main urban centres, including, but not limited to Stafford and Stone.¹³
- 7.26 In terms of surface water flooding, the SFRA (2019) and Staffordshire County Council’s Local Flood Risk Management Strategy highlight that Stafford and Gnosall are at high risk of surface water flooding, falling within the top 10 urban and rural areas at risk in the County.

¹³ 2019 (JBA Consulting) Southern Staffordshire Councils Level 1 Strategic Flood Risk Assessment https://www.staffordbc.gov.uk/sites/default/files/cme/DocMan1/Planning%20Delivery/2018s1642%20-%20Southern%20Staffordshire%20SFRA%20Final%20Report%20v1.0_0.pdf

- 7.27 Taking the above into consideration, it is therefore considered that directing growth to the higher tier settlements through Options 3(high) and 3(low), and to a lesser extent Options 5(high) and 5(low) have the potential to lead to long term negative effects, given these settlements have been identified as high flood risk areas. However, Options 6(high) and 6(low) also have the potential to lead to negative effects in this respect given all four transport corridors include at least one high risk settlement (as set out above).
- 7.28 Options 6(high) and 6(low) disperse growth throughout the rural and urban settlements, and are therefore likely to perform more positively than Options 3(high), 3(low), 5(high) and 5(low). This is given that increasing density at the tier 1 and tier 2 settlements (Stafford and Stone) may limit opportunities to avoid the highest flood risk areas and implement suitable mitigation. Further to this, where Options seek to deliver low levels of growth to existing settlements (Options 5(high), 5(low), 6(high), and 6(low) through the delivery of at least one New Garden Community) this may further increase the opportunity to avoid high flood risk areas. Thus it is considered that Options 5(low) and 6(low) are best performing given the lower quantum proposed.
- 7.29 Where development is proposed outside of the settlements discussed above, it is assumed that the precautionary principle will be applied, ensuring that flood-related issues are sufficiently addressed and agreed with the Environment Agency, as part of a site specific Flood Risk Assessment (FRA).
- 7.30 Positive effects are anticipated for all Options which include the delivery of at least one New Garden Community (5(high), 5(low), 6(high) and 6(low)) as they are of a scale which could incorporate measures used to adapt to climate change, for example urban cooling and the delivery of green infrastructure. However at this stage it is considered that options cannot be clearly differentiated with respect to climate change adaptation.
- 7.31 Taking the above into account, it is considered that options proposing a lower level of growth perform more positively against the climate change adaptation theme (3(low), 5(low) and 6(low)).
- 7.32 Overall, Option 3(high) followed by 3(low) performs least strongly of the Options given they direct growth to locations vulnerable to flooding, while Option 6(low) followed by 6(high) is best performing in this respect. It is however recognised that there is a level of uncertainty for all Options at this stage; and therefore the nature and significance of effects will be dependent on the precise location of growth and mitigation delivered at the project level. There is no evidence at this stage to suggest that any of the Options are likely to have a significant effect.

Climate change mitigation

Option 3 (high)	Option 3 (low)	Option 5 (high)	Option 5 (low)	Option 6 (high)	Option 6 (low)
3	3	 1	2	 1	2

- 7.33 There is a need to minimise per capita CO₂ emissions from transport, and the built environment. In respect of the former, there is little to add to the discussion presented below, under 'Transport'. In respect of the latter, a key consideration is the need to support larger developments, i.e. the delivery of at least one New Garden Community. While development proposed under any of the Options has the potential to incorporate renewable or low carbon energy, generally larger-scale developments offer greater opportunities in this respect. For example, in larger schemes, large active solar systems can be combined with community heating schemes to support renewable energy and increased energy efficiency. Options 5(high), 5(low), 6(high), and 6(low) are therefore best performing given they direct a significant proportion of growth necessary to meet identified needs at least one New Garden Community. However, given the long lead-in time for Garden Communities, potential positive effects are not likely to be delivered until the end of the Plan period, and into the next.
- 7.34 Overall, the Options which include the delivery of at least one New Garden Community, with the highest level of growth, are best performing. It is however recognised that there is a level of uncertainty for all Options at this stage, and therefore the nature and significance of effects will be dependent on the precise location of growth and mitigation delivered at the project level.

Economy and employment

Option 3 (high)	Option 3 (low)	Option 5 (high)	Option 5 (low)	Option 6 (high)	Option 6 (low)
2	2	1 	2	?	?

- 7.35 A key function of the New Local Plan will be to ensure that employment provision will continue to meet the needs of the Borough as the population grows over the plan period. This will include ensuring that a range of different types of employment are provided across the settlement hierarchy, including allocating sufficient land to support the needs of the local rural economy. Additionally, there could be a need over time to endeavour to increase provision of a range of higher skilled jobs in key economic growth areas such as technological and creative industries, with the aspiration of attracting / retaining highly skilled graduates. In this context, all options would deliver significant new employment floorspace, though there would be differences in how this employment land would be distributed within the plan area.

- 7.36 By dispersing development in line with the settlement hierarchy, Options 3(high) and 3(low) would perform well in terms of achieving a broad distribution of new employment floorspace across the Borough. Stafford and Stone, as the largest settlements and key strategic centres for goods, services and employment, would therefore deliver the greatest quantum of new employment floorspace under Options 3(high) and 3(low). This would harness the settlements' existing strong transport links to focus the greatest proportion of new employment growth at settlements which are both most sustainable and which benefit from the greatest amount of supporting infrastructure. Stafford itself is the Borough's major employment centre, having the largest shopping centre in the area and containing the largest concentration of commercial premises and multiple retailers. Significant opportunities exist at the Stafford Gateway Project, a major redevelopment site to the West of Stafford town which will provide a new business and commercial district, a new entrance to Stafford Station, and residential areas. Option 3(high) and 3(low) would direct the highest proportion of growth to Stafford and could therefore unlock the greatest potential of the Stafford Gateway, particularly in light of the forthcoming HS2 compatible trains for the station to be delivered at Stafford over the plan period. Stafford hosts significant individual employers including a hospital, a major MOD site and The New Beacon Group education campus (previously Staffordshire University), whilst Stone is also a significant centre for employment. All Options would deliver substantial growth at the two largest settlements in absolute terms, though Options which deliver the highest proportion of growth are considered to perform most strongly in principle.

- 7.37 Additionally, the proportionate distribution of growth under Options 3(high) and 3(low) could also have the effect of distributing some employment land to smaller settlements to meet localised needs. Although the smaller settlements would generally be unlikely to be sustainable locations for strategic employment growth, there will likely be benefits of ensuring a provision of small-scale employment land to help sustain and enhance the vitality of rural settlements.

- 7.38 Options 5(high) and 5(low) would also distribute growth across the settlement hierarchy but would have the significant additional focus of directing substantial growth to at least one New Garden Community at a location(s) yet to be determined. There are potentially significant implications in relation to economy and employment from the addition of at least one New Garden Community on the basis that a proportion of the Borough's employment land supply would be delivered at new locations rather than within the existing settlements. Both positive and negative effects could arise from this distribution.

- 7.39 Positive effects could include the provision of new, high quality and diverse employment units which could help meet both existing need within the Borough and prove attractive to the market in relation to older, lower quality stock available elsewhere. This could help New Garden Communities to quickly embed high quality employment space within the emerging development and help ensure that they do not simply function as dormitory communities for the existing settlements. Potential negative effects could be that the New Garden Communities effectively cannibalise the employment need of the established settlements by directing some growth away from employment hubs at Stafford and Stone. This could potentially have the effect of depriving the higher tier settlements from achieving their full economic potential or attracting some key established employers away from older accommodation toward newer accommodation at the New Garden Communities.

- 7.40 However, the viability of employment land can be closely linked to its connectivity with transport networks and there are inherent benefits from directing the greatest proportion of growth to established employment sites as they are already well embedded in the transport network, both in terms of receiving and distributing products and in terms of access for employees and customers. Therefore there could be potential for negative effects as a result of directing a proportion of growth away from such sites and towards virgin sites in a New Garden Community at which transport connectivity is untested in practice and potentially more car-dependent. Negative effects in relation to employment and economy could also stem from the significant lead-time associated with delivering growth at new settlements. Growth under Option 5(high) or 5(low) would need to be carefully phased to ensure a pipeline of supply in the early years of the plan period before supply at any New Garden Communities comes online later in the plan period.
- 7.41 Growth under Options 6(high) and 6(low) would depart from a settlement hierarchy-led distribution and instead focus a proportion of growth along identified radial 'transport corridors'. Although the Consultation Document identifies these corridors using the general description of 'transport', more detailed examination suggested a heavy focus on road corridors rather than a broader interpretation which includes other transport modes such as rail. Five indicative corridors are identified through the Consultation Document though it is noted that this is not necessarily an exhaustive list. These are:
- Indicative corridor 1: A518 (Gnosall – Haughton – Derrington – Stafford)
 - Indicative corridor 2: A34/M6 (Barlaston – Tittensor – Stone – Aston-by-Stone – Stafford)
 - Indicative corridor 3: B50626/A5013 (Croxtton – Eccleshall – Great Bridgford – Creswell – Stafford)
 - Indicative corridor 4: A51 (Stone – Weston – Hixon – Great Haywood – Little Haywood)
 - Indicative corridor 5: A519/B5026 (Norbury – Woodseaves – Eccleshall – Norton Bridge – Stone)
- 7.42 Key implications in relation to employment and economy from this approach could include both positive and negative effects depending on which corridors provide greatest focus for growth. First, the greatest potential for positive effects could be at transport corridors which link the Borough's two key economic hubs of Stafford and Stone and/or provide good access to the M6. For example, the A34 / M6 corridor would focus growth at settlements along the strategic corridor between Stone and Stafford which is linked by the key arterial routes of the M6 and the A34, both of which provide onward connectivity to other economic hubs in the wider sub-region. Growth at this location could therefore have potential to deliver significant new employment land at the two main settlements where supporting infrastructure is already well established, whilst also enhancing the employment offer at intervening settlements between Junctions 14 and 15 of the M6. The area is attractive to the market due to its central location and transport links, availability of labour and proximity to existing employment sites. New strategic employment sites are being delivered at Stafford and Stone, including Redhill Business Park and the extension of Beacon Business Park and Meaford. In this context, a distribution option which focused growth along the A34 / M6 corridor would have significant potential to complement the existing employment offer at Stafford and at Stone, and enhance the Borough's economic output over the plan period.
- 7.43 Conversely, other corridors could, in isolation, have potential for negative effects in relation to economy and employment on the basis that they would direct growth away from existing economic and education hubs towards locations with limited supporting infrastructure and lower capacity transport links. The A519 / B5026 stands out as being notably unsuitable as a focus for strategic growth as the majority of key settlements along the route are at Tier 4 or lower of the settlement hierarchy, whilst the road corridor linking the settlements with Stone is non-strategic and would flow directly through central Eccleshall with associated traffic constraints acting as a potential obstacle to growth. Without significant investment in the supporting infrastructure of the relevant settlements and in the A519 and B5026, potentially including a link road or bypass around Eccleshall, the corridor is considered unlikely to have any meaningful potential to serve as a conduit for sustainable future employment growth. Additionally, it is unclear that focusing growth at any corridor other than that between Stone and Stafford would be expedient in economic and employment terms.

- 7.44 Overall, there is potential for significant positive effects from all options, though it is challenging to draw detailed conclusions in relation to economy and employment from any of the reasonable spatial strategy alternatives at this stage as there remain a number of variables and uncertainties. The delivery of at least one New Garden Community through Options 5(high), 5(low), 6(high) and 6(low) would have the potential to provide an economic boost to the Borough, creating a modern and sustainable living and working environment and relieving development pressure at existing settlements. All options could have potential to support a diverse economy which provides high quality jobs, including supporting specialist industries and Small & Medium-sized Enterprises (SMEs).
- 7.45 Distributing growth in line with the existing settlement hierarchy under Options 3(high), 3(low), 5(high) and 5(low) would have positive effects for the continued vitality of the Borough’s key settlements, as well as positive effects lower down the settlement hierarchy at the rural settlements.
- 7.46 However, the uncertainties associated with the transport corridor-led Options 6(high) and 6(low) stand out in particular as the nature of effects is likely to be significantly dependant on which corridors are selected and whether growth is distributed between several corridors or focused at a single one. In this sense it is considered that uncertain effects from Options 6(high) and 6(low) must be concluded at this stage.
- 7.47 It is considered that Option 5(high) performs most strongly overall by delivering high growth which is distributed across the existing settlement hierarchy in the early years of the plan before shifting focus to a New Garden Community later in the plan period. However, the precise nature of effects will depend on which Garden Community options are selected and how many are taken forward in the plan.

Health and wellbeing

Option 3 (high)	Option 3 (low)	Option 5 (high)	Option 5 (low)	Option 6 (high)	Option 6 (low)
1	1	1	1	2	2

- 7.48 The health and wellbeing SA objectives seek improvements to the physical and mental health of residents through the development process, including through delivering new and enhanced recreation and healthcare facilities and by reducing the impact of all types of pollution on residents. New development can offer significant opportunities at both a localised and strategic scale to deliver new and enhanced services and facilities with positive implications for health and wellbeing. This can include healthcare, sports and multifunctional green infrastructure, including traffic-free walking and cycling facilities within and beyond new development.
- 7.49 By distributing development in line with the settlement hierarchy, Options 3(high) and 3(low) could have the greatest potential to support improvements and expansion of walking and cycling networks within the two largest settlements. This could include the River Trent corridor, the Trent and Mersey Canal path and Westbridge Park in Stone, and NCN routes 5 and 55 in Stafford. Delivery of new housing at scale at Stafford and Stone under Options 3(high) and 3(low) would maximise the potential to integrate new development with such existing green infrastructure assets, whilst also offering potential to substantially enhance the extent and quality of such assets through financial contributions. All Options would deliver substantial growth at the two largest settlements in absolute terms though Options which deliver the highest proportion of growth are considered to perform most strongly in principle.

- 7.50 Options which direct some growth to at least one New Garden Community are likely to have significant potential to deliver new walking and cycling infrastructure at scale through a strategic masterplan. Locations for potential New Garden Communities are not settled at this stage but, depending on the final location (or locations), there could be potential to leverage existing long distance green infrastructure networks, particularly the Newport to Stafford Greenway, to integrate the new development with the existing built areas of the Borough through sustainable modes of transport where possible. The strategic masterplan process would also have potential to integrate the delivery of new homes, employment and retail with walking and cycling access, embedding healthy transport choices into the new development. This would be harder to achieve at a holistic scale through Options 3(high) and 3(low) on the basis that enhancing walking and cycling connectivity within existing built areas is necessarily a retrofitting exercise. There would also be significant potential to deliver new healthcare facilities at various scales within a New Garden Community, potentially to meet broader need arising elsewhere in the plan area if necessary.
- 7.51 Options 6(high) and 6(low) perform poorly in relation to the health and wellbeing SA objectives on the basis that a transport corridor-led approach to growth would direct growth in many instances to locations which are car dependant and relatively distant from the existing main settlements. Although one indicative transport corridor broadly aligns with the route of the Newport to Stafford Greenway, offering potential to integrate with an established radial walking and cycling route, the majority of corridors are car-centric. The Consultation Document does not express a preferred option in terms of transport corridors so it must be assumed that any and all could potentially come forward at this stage.
- 7.52 Overall, it is considered that Options 6(high) and 6(low) perform most weakly in relation to the health and wellbeing SA objectives as there is a risk that growth would be directed to locations which are car dependant when the potential transport corridors are considered as a collective. However, it is considered that at this stage it is not possible to differentiate between Options 3(high), 3(low), 5(high) and 5(low) in supporting the health of residents. Additionally, it is considered that given the number of spatial choices still to be made, it is not possible to meaningfully differentiate between any of the Options in terms of their capacity to reduce exposure to light, noise and air pollution.

Historic environment

Option 3 (high)	Option 3 (low)	Option 5 (high)	Option 5 (low)	Option 6 (high)	Option 6 (low)
2	★1	2	★1	2	★1

- 7.53 The Borough has a rich historic environment, for example the town centres of Stafford, Stone and many of the rural villages have historic cores which are designated as Conservation Areas. Outside of these settlements Trentham Gardens, Sandon Park, Shugborough Park and the German Military Cemetery on Cannock Chase are designated as Historic Parks and Gardens. There were also seven heritage assets on the Historic England Heritage at Risk Register in 2018 across the Borough (note there has been no change since then). Two of these were buildings and structures, two were archaeological entries and three were Conservation Area entries.

- 7.54 Given the volume of heritage assets located throughout the Borough, it is considered that all of the Options are likely have an impact on the historic environment. It is recognised that Stafford itself is significantly constrained, as established through the Historic Landscape Characterisation Study (2009), which highlights the sensitivities of the landscape around Stafford Castle (to the west of Stafford town) and the historic town centre in particular.¹⁴ The significance of the town's historic core is reflected by the assets present and the high archaeological potential. Options 3(high) and 3(low), followed by 5(high) and 5(low), seek to focus growth around Stafford, followed by Stone, in line with the new settlement hierarchy. This will likely result in increased pressure on the rich historic environment present at these locations; notably the extensive Conservation Areas present (all of which contain numerous Listed Buildings). Together with their settings, these heritage assets require protection and enhancement, in accordance with the Conservation Area Appraisals and requirements of the NPPF (2019). It is therefore considered that directing significant growth to these locations has the potential to lead to long term adverse effects on the local historic environment.
- 7.55 However, focussing growth at Stafford and Stone also presents an opportunity for regeneration, leading to positive effects against this SA theme. Specifically, the redevelopment of brownfield sites in the higher tier settlements has good potential for positive townscape improvements. In this context, where proposals seek to deliver good, high quality design and appropriate layout, this may lead to landscape / townscape improvements and positive effects such as increased awareness and access. This however is uncertain at this stage.
- 7.56 In terms of Options 6(high) and 6(low), it is considered that focussing growth at lower tier, rural settlements would likely have a greater impact on the wider historic landscape than Options which direct growth to the primary towns. However it is noted that historic assets are more sparsely located at lower tier settlements.
- 7.57 Given the rural nature of the Borough and the constraints present, large-scale development proposed through Options 5(high), 5(low), 6(high) and 6(low) is likely to lead to a residual significant negative effect on the rural character, historic environment, and setting of potential New Garden Communities. It is also considered that archaeological investigations may be required prior to any development. Notably, the Historic Landscape Characterisation Study (2009) highlights that there is a high potential for below ground archaeological remains, with several designated sites existing to the east of Stafford town. However, as the preferred New Garden Community locations are currently unknown, residual effects are uncertain at this stage. It is also recognised that given the extended lead-in time for New Garden Communities, any potential effects are not likely to be realised until the end of the Plan period or the next.
- 7.58 In terms of high and low growth Options, at this stage it is considered that increased growth under Options 3(high), 5(high) and 6(high) has the potential to lead to significant effects given the sensitivity of the environment, and the potential impacts on rural town / villagescape and character. To this effect, it is considered that as the level of growth increases so does the significance of effects; and therefore Options 3(high), 5(high) and 6(high) perform less strongly than options 3(low), 5(low) and 6(low). However, it is recognised that there is the opportunity for growth to deliver mitigation and positive townscape enhancements; with the potential for positive effects through improving accessibility and understanding of heritage assets. The nature and significance of effects will therefore ultimately be dependent on the exact location, design / layout of development and the implementation of mitigation measures.
- 7.59 Overall, it is difficult to rank the high or low growth Options in terms of preference against this SA Theme as they all have the potential to direct development to areas in that are sensitive in terms of the historic environment, with the potential for residual positive and negative effects. It is considered that the significance of effects will ultimately be dependent on the design/ layout of development as well as the implementation of mitigation measures.

¹⁴ Staffordshire County Council (2009) Historic Landscape Characterisation Study
<https://www.staffordbc.gov.uk/live/Documents/Forward%20Planning/Examination%20Library%202013/E80---HISTORIC-ENVIRONMENT-CHARACTER-ASSESSMENT-FOR-STAFFORD.pdf>

Housing

Option 3 (high)	Option 3 (low)	Option 5 (high)	Option 5 (low)	Option 6 (high)	Option 6 (low)
★ 1	2	3	4	5	6

- 7.60 The Consultation Document is clear that demand for housing in the Borough is high due to a combination of natural demographic change, an increased growth in single person households and inward migration from adjoining areas. Affordability is particularly acute in certain areas, notably some rural areas and in Stone. This has led to increasing challenges in terms of entering the housing market for particular groups, including young people, single parent families and those on below average wages. Therefore, achieving an appropriate housing mix at the right locations, including affordable housing and specialist housing, is a key priority for the New Local Plan and is the central focus of the housing SA objective. Housing supply remains strong and Stafford Borough currently has a 5 year housing land supply of deliverable sites.¹⁵ It will be important that the New Local Plan seeks housing delivery at sustainable locations, particularly brownfield sites where possible.
- 7.61 In this context, there is a clear need for growth delivered under any of the reasonable spatial strategy alternatives to meet the minimum housing need for the Borough over the plan period. Although the Consultation Document seeks views on a range of housing need figures, this range is, in practice, between 408 dwellings per annum (dpa) (i.e. the Government's standard methodology-derived figure) and 746 dpa. All of the reasonable spatial strategy alternatives perform strongly in absolute terms as all six would deliver at least the minimum housing need of 408 dpa over the plan period.
- 7.62 In relative terms, the high growth options – 3(high), 5(high) and 6(high) - could be considered to perform more strongly in principle in relation to housing on the basis that they would deliver a greater number of homes overall and that such a scenario would offer greater potential to meet the broadest possible range of housing need including through providing the widest range of housing types and tenures. This would likely include affordable housing delivery at a more significant scale than under the lower growth options. However, delivering a higher quantum of homes in itself is not necessarily a positive as the distribution and location of such growth is key.
- 7.63 In this context, the spatial distribution of housing under Option 6(high) and 6(low) is considered to perform notably weakly in relation to the other reasonable spatial strategy alternatives on the basis that many of the identified indicative transport corridors do not appear to be sustainable locations for growth. Growth would be focused along road transport corridors, potentially pushing development towards a number of settlements which are car dependant, have little public transport accessibility and are poorly served by local services and facilities. The A519 / B5026 indicative corridor illustrates this point clearly, with nearly all of its settlements lying at Tier 4 or below on the hierarchy and there being no existing rail spur or realistic prospect of delivering one.
- 7.64 The distribution of housing growth under Option 5(high) and 5(low) would be aligned with the settlement hierarchy in the first half of the plan period, with the focus of delivery switching to at least one New Garden Community in the second half of the plan period. Whilst there are merits to this approach in principle, the reliance on at least one New Garden Community to deliver at least 3,000 new dwellings within the plan period carries an inherent risk of under-delivery given the significant complexities associated with bringing development at a new community forward. If the delivery of one or more New Garden Community were to be delayed then it would be likely that the plan would fall short of meeting its housing target. Therefore, Options 5(high) and 5(low) are both considered to perform less strongly than Options 3(high) and 3(low) which would deliver the full housing requirement in line with the settlement hierarchy, avoiding the risk to supply associated with reliance on a New Garden Community whilst directing the highest proportion of growth to the most sustainable settlements.

¹⁵ Staffordshire County Council (2009) Historic Landscape Characterisation Study
<https://www.staffordbc.gov.uk/live/Documents/Forward%20Planning/Examination%20Library%202013/E80---HISTORIC-ENVIRONMENT-CHARACTER-ASSESSMENT-FOR-STAFFORD.pdf>

7.65 Overall, although significant positive effects are anticipated from housing delivery under all of the Options, it is possible to meaningfully differentiate between them in relative terms. The high growth Options are considered to outperform their low growth counterparts, whilst the Options which follow the settlement hierarchy without relying on a Garden Community for housing delivery are considered to perform most strongly in terms of delivery within the plan period. Therefore, Option 3(high) is considered to perform most strongly overall in relation to the housing SA objective as it will achieve high growth across the settlement hierarchy, directing the highest proportions of growth to the most sustainable settlements, without relying on delivery coming forward from a New Garden Community. Option 3(low) follows the same spatial principle and performs next strongest. Options 5(high) and 5(low) have the next strongest performance whilst Options 6(high) and 6(low) perform notably weakly in that they each have potential to direct significant growth to locations which are not sustainable in relation to others in the plan area.

Land, soils and waste

Option 3 (high)	Option 3 (low)	Option 5 (high)	Option 5 (low)	Option 6 (high)	Option 6 (low)
2	1	4	3	6	5

7.66 There are two areas of Green Belt within the Borough, around the North Staffordshire conurbation and in the south eastern area of the Borough, including the Cannock Chase AONB. The NPPF (2019) sets out the Government's commitment to maintaining areas of Green Belt and states that these designations should only be reviewed in exceptional circumstances. Therefore, on the assumption that the Borough's development need for the plan period can be accommodated on land not designated as Green Belt, the new Local Plan will not look at revising the current Green Belt boundaries. Options 3(high), 3(low), 5(high) and 5(low) are therefore best performing in this context, given they direct growth in accordance with the new settlement hierarchy; which excludes settlements which are inset in Green Belt. Additionally, it is recognised that all potential New Garden Community locations are outside of the Green Belt and therefore Options 5(high), 5(low), 6(high) and 6(low) perform positively in terms of facilitating growth consistent with national policy.

7.67 Options 6(high) and 6(low) however through Transport Corridor 2 (A34 / M6) direct growth to settlements inset of Green Belt to the north of the Borough; notably Barlaston and Tittensor. Options 6(high) and 6(low) therefore perform least positively in this respect; with Option 6(high) worst performing given that higher growth is likely to result in higher land take, and therefore increased significance of effects.


7.68 Options 6(high) and 6(low) also perform less positively than other Options in terms of supporting development which makes effective use of previously developed land. Options 3a and 3b are likely to perform most positively in this respect given development is focused at Stafford and Stone in accordance with the new settlement hierarchy. Options 5(high) and 5(low) perform less positively than 3a and 3b as strategic scale growth proposed through the delivery of at least one New Garden Community will likely result in significant greenfield loss (note this loss is also anticipated under Options 6(high) and 6(low)).

7.69 However, given the scale of development required in Stafford Borough over the plan period it will likely be necessary to allocate a level of greenfield land under all Options, as there is insufficient previously developed land in sustainable locations available to meet the requirements. As such, residual effects are likely to be negative under all Options.

7.70 While much of the Borough is intensively farmed agricultural land, it is considered that development under all Options will avoid the Best and Most Versatile (BMV) agricultural land where possible. Nonetheless, given the rural nature of the Borough, it is predicted that all Options will result in the loss of some areas of BMV agricultural land, leading to significant long term negative effects against this SA theme. In terms of the Options, it is considered that directing growth to the existing main urban settlements through Options 3(high) and 3(low) will protect BMV land where possible, and that residual loss may be less significant than under other Options. Options 5(high) and 5(low) are also anticipated to perform well in this respect, however it is considered that the delivery of at least one New Garden Community would likely result in at least some loss of BMV agricultural land. Options 6(high) and 6(low) are therefore worst performing due to the increased growth at rural settlements along the transport corridors, combined with the delivery of at least one New Garden Community.

- 7.71 In Stafford Borough the projected increase in population size suggests that there is likely to be a corresponding increase in household waste. This will increase the pressure placed on existing waste and recycling infrastructure within the Borough, which may result in some facilities reaching maximum capacity. It is considered that all Options will support wider County objectives for the sustainable management of minerals and waste, and that spatially, Options cannot be differentiated between in this respect, with mitigation provided at the project scale. It is however recognised that additional waste infrastructure is likely to be provided through New Garden Communities, i.e. Options 5(high), 5(low), 6(high), and 6(low). In terms of ranking high or low growth options, low growth options (Options 3(low), 5(low) and 6(low) perform more positively than high growth as a lower level of growth would minimise additional pressure on the Borough’s infrastructure network.
- 7.72 A significant proportion of Stafford Borough falls within a Mineral Safeguarding Area (MSA) for Sand & Gravel. All Options include areas constrained in this respect, and as such, all Options have the potential to adversely impact upon the MSAs present. However it is recognised that in accordance with the NPPF (2019) and the adopted Local Plan, new development proposals should not lead to the sterilisation of significant mineral resources, or compromise the continued operation or expansion of any existing waste management facilities as defined in the Staffordshire Minerals Local Plan (2017).¹⁶
- 7.73 Overall, all Options seek to deliver new development, where possible through the re-use of brownfield land and land not of high environmental value, in sustainable locations at Stafford, Stone and the Borough’s villages. Positive effects in this respect are anticipated to be greatest through the Options which do not include New Garden Communities, which propose a low level of growth, and which seek to distribute growth across the new settlement hierarchy. However it is recognised that New Garden Communities do present an opportunity for infrastructure delivery, e.g. waste facilities.

Landscape

Option 3 (high)	Option 3 (low)	Option 5 (high)	Option 5 (low)	Option 6 (high)	Option 6 (low)
2		4	3	6	5

- 7.74 The Borough’s natural landscape is characterised by flat low lying land positioned between the natural corridors of the Rivers Penk and Sow. Outside of these corridors much of the area is intensively farmed agricultural land, interspersed with ancient and semi-natural woodland, and grasslands. The primary issue locally is the nationally designated Cannock Chase Area of Outstanding Natural Beauty (AONB); which extends across the south east of the Borough. In line with national policy nationally designated areas such as the Cannock Chase AONB are afforded the highest status of protection in relation to landscape and scenic beauty (NPPF, 2019). In addition to national policy requirements, the Cannock Chase AONB Management Plan (2018) provides guidance for the management, preservation and enhancement of the unique qualities of the areas landscape and environment.¹⁷ While protection is provided at the higher level, it is nonetheless considered, given the level of growth proposed through all Options, that development has the potential to adversely impact upon special landscape features, character, and setting of the AONB.
- 7.75 It is recognised that none of the higher tier (Tier 1-3) settlements are constrained in terms of the AONB, and as such, Options 3(high), 3(low), and to a lesser extent 5(high) and 5(low) perform positively in terms of directing a significant proportion of growth away from the nationally designated site. Additionally, directing growth to the main urban areas will contribute positively towards the preservation of local landscapes throughout the remainder of the Borough, avoiding significant development in the open countryside and supporting sustainable patterns of development. Options 3(high), 3(low), and to a lesser extent 5(high) and 5(low), are also likely to perform most positively through utilising previously developed land in the key urban settlements. The use of brownfield land for development means that the pressure placed on greenfield land is reduced, preserving the countryside and landscape of an area.



¹⁶ Staffordshire County Council (2017) The Minerals Local Plan for Staffordshire (2015 to 2030) <https://www.staffordshire.gov.uk/environment/planning/policy/mineralslocalplan/mineralsLocalPlan.aspx>

¹⁷ Cannock Chase AONB Unit (2018) Cannock Chase AONB Management Plan

- 7.76 Options 6(high) and 6(low) perform least positively of the Options as Transport Corridor 4 (A51) focusses growth at the rural settlements of Great Haywood and Little Haywood, which are located in close proximity (and in the case of Little Haywood, adjacent to) to the AONB. The Cannock Chase AONB Review of AONB Landscape Character Framework (2017) characterises the areas surrounding Great and Little Haywood as 'Urban' and 'Settled Farmland'.¹⁸ Looking specifically at the latter, the landscape guidelines include:
- "Monitor the impact of new and extended dwellings in this landscape, encouraging the adoption of vernacular building styles / materials when considering new development proposals; and
 - Seek opportunities to conserve and enhance hedgerow tree cover to soften the impact of adjoining hard urban edges."
- 7.77 It is therefore considered that growth under Options 6(high) and 6(low) have the greatest potential to adversely impact upon the landscape; including the intrinsic qualities of the AONB, its character and setting.
- 7.78 Options 6(high) and 6(low), along with Options 5(high) and 5(low), also perform less positively than other Options through the delivery of at least one New Garden Community. This is given that strategic scale growth has the potential to lead to negative effects in terms of visual impacts and impacts on wider landscape setting; particularly given the rural nature of the Borough. However, it is recognised that the delivery of large scale development offers greater potential in terms of opportunities to mitigate negative effects as well as deliver potential benefits through enhancing existing, and the provision of new, green infrastructure and landscaping in the area. This may include the delivery of green links, such as the canal, from the surrounding open countryside and the Cannock Chase AONB into the heart of Stafford; safeguarding and enhancing the landscape setting. However, effects on the nationally designated landscape is currently uncertain given potential New Garden Community locations are yet to be determined.
- 7.79 In terms of high and low growth Options, at this stage it is considered that increased growth under Options 3(high), 5(high), and 6(high) are likely to lead to significant effects given the sensitivity of the landscape, and the potential impacts on the rural character of the Borough. To this effect, it is considered that as the level of growth increases so does the significance of effects; and therefore Options 3(high), 5(high) and 6(high) perform less positively than Options 3(low), 5(low) and 6(low). However, it is recognised that there is the opportunity under all Options for growth to deliver landscape mitigation measures; maximising opportunities to secure and/or improve green infrastructure, public open space and recreation provision through planning gain. The nature and significance of effects will therefore ultimately be dependent on the exact location, design/ layout of development, and the implementation of mitigation measures.
- 7.80 Overall, given the Borough's rural nature and the landscape assets present, it is considered that all options have the potential to lead to residual negative effects as result of the introduction of development in previously undeveloped areas; despite preferred New Garden Community locations being currently unknown. In terms of ranking the Options, Option 6(high) followed by 6(low) are considered worst performing given these Options direct the highest level of growth towards the AONB. It is difficult to rank other Options given the preferred New Garden Community locations are currently unknown; however, it is anticipated that any strategic growth on greenfield land within the Borough is likely to lead to residual negative effects on the landscape, given the existing constraints present. Therefore, Option 3(low) followed by 3(high) are best performing and given these options disperse growth in accordance with the settlement hierarchy. Options 3(low) and 3(high) focus development at the urban areas of Stafford and Stone, which are distant from the nationally designated landscape located to the south east of the Borough, and have greatest opportunity utilise brownfield land, and support sustainable growth.

¹⁸ Ashmead Price (2017) Cannock Chase AONB Review of AONB Landscape Character Framework Stage 2 Landscape Character Type Descriptions

Population and communities

Option 3 (high)	Option 3 (low)	Option 5 (high)	Option 5 (low)	Option 6 (high)	Option 6 (low)
	2		2	3	3

- 7.81 The population and communities SA objectives capture a broad range of social and community benefits to be sought through new development over the plan period. Key objectives within the direct influence of strategic plan-making include the need to sustain and enhance the Borough’s towns and villages, and the need to providing high quality and accessible community infrastructure and facilities. Supplementary objectives which are less directly within the scope of plan-making include seeking to reduce crime, support the creation of a sense of community identity and promote tolerance and respect for other cultures.

- 7.82 Over 60% of the population live in the Stafford or Stone whilst the remainder live in the rural areas, where there are a number of larger settlements such as Eccleshall, Gnosall, Hixon, Barlaston, Great Haywood, Little Haywood and Colwich as well as smaller villages and hamlets. The greatest proportion of goods, services and community facilities are therefore located at the two highest tier settlements of Stafford and Stone, with a smaller – though important – range of facilities available at the lower tier settlements. In addition to providing the broadest range of education, employment, green infrastructure and other key community facilities, Stafford also has the largest leisure offer in the plan area, including the Gatehouse Theatre and the Riverside retail and leisure development. Between them, Stafford and Stone therefore provide a natural focus for growth in the New Local Plan.

- 7.83 There is also a need to ensure that as far as is practicable, key services and facilities are provided at smaller settlements to minimise the need for residents to travel to Stafford and Stone and to sustain the settlements as thriving communities in their own right. Distributing growth broadly in line with the settlement hierarchy could help ensure that whilst the highest proportion of growth is directed to the most sustainable locations for growth, an appropriate level of growth is also directed to smaller settlements with the associated opportunities for delivering new and enhanced community facilities across the plan area.


- 7.84 On this basis, Options 6(high) and 6(low) stand out as notably poorly performing, as growth would be directed to linear transport corridors rather than dispersed widely across the settlement hierarchy. This could lead to higher tier settlements which lie outside identified transport corridors being deprived of growth necessary to sustain their social and economic vitality over the plan period. Correspondingly, growth under these Options could be directed to locations at which there is limited existing community infrastructure, and which are poorly situated to provide accessible new community infrastructure.

- 7.85 Directing growth in line with the settlement hierarchy through Options 3(high) and 3(low) would ensure that development is directed to the most sustainable settlements with sufficient services and facilities to support development, whilst also delivering new and enhanced service provision across the Borough. This will help sustain Stafford and Stone as the Borough’s key settlements over the plan period, whilst also directing more limited growth to smaller settlements which provide more localised service functions.

- 7.86 The Options which direct significant growth to at least one New Garden Community would provide opportunities to co-ordinate the provision of new facilities as part of a strategic masterplan. This could help ease pressure on existing facilities in the established settlements and achieve a broader distribution of service provision throughout the Borough over the long term. Delivery of at least one New Garden Community would also present opportunities to achieve delivery of strategic new green infrastructure at a significant scale, with a range of associated multi-functional benefits across many social and community aspects. This could include embedding walking and cycling into new developments, ensuring that schools, employment and homes would relate well to each other spatially and that all could potentially be accessed without the need for a car. The delivery of a New Garden Community through Options 5(high), 5(low), 6(high) and 6(low) would have the potential to deliver new retail, employment, and community facilities at a strategic scale, potentially including schools and healthcare facilities.

- 7.87 There is also a need to ensure that new development contributes to addressing entrenched deprivation in the Borough, by improving access to healthcare, education and other key assets. There are notable pockets of multiple deprivation in central Stafford as well as more limited deprivation in some areas of the North Staffordshire Urban Area on the southern fringes of Stoke-on-Trent. It is again considered that Option 6(high) and 6(low) have potential to perform poorly in relation to addressing deprivation based on the uneven distribution of growth in relation to the settlement hierarchy. Directing growth to relatively arbitrary transport corridors is considered likely to embed car dependency in new development, failing to improve access to services for those in deprived areas of the Borough. Additionally, by directing significant growth to new Garden Communities, Options 5(high) and 5(low) could potentially reduce the level of growth directed to deprived areas of Stafford and the North Staffordshire Urban Area in the second half of the plan period which could lead to minor adverse effects in relation to the ongoing provision of community facilities in these areas.
- 7.88 In terms of the spatial distribution of growth, Options which focus growth at transport corridors are considered to perform notably poorly in relation to the population and communities SA objectives on the basis that the benefits of growth would not be distributed proportionately around the Borough and that growth would potentially be directed to unsustainable locations which could be challenging to access without a car. Correspondingly, Options which distribute growth proportionately in line with the settlement hierarchy are considered to perform most strongly. The Options which engage delivery of a New Garden Community could lead to both positive and negative effects in relation to the population and communities SA objectives as, although they would provide opportunities for strategic delivery of significant new community and green infrastructure through a comprehensive masterplanning process, they could also potentially reduce the level of growth and inward investment at the Borough’s key settlements over the second half of the plan period.
- 7.89 In light of the above, it is considered that Options 3(high) and 5(high) perform most strongly but that it is not possible to meaningfully differentiate between them. Options 3(low) and 5(low) are also considered to perform broadly on a par with each other, whilst Options 6(high) and 6(low) perform least strongly. It is considered that there is no potential to differentiate between the Options in terms of the SA objectives to reduce crime, create a sense of community belonging and support tolerance as these matters are not spatial in nature.

Transport

Option 3 (high)	Option 3 (low)	Option 5 (high)	Option 5 (low)	Option 6 (high)	Option 6 (low)
2	 1	4	3	6	5

- 7.90 The Borough has good road and rail links. Stafford is situated on the M6, with junction 14 to the north and junction 13 to the south, and is well connected to the M54, M42 and M6 toll. Given existing high levels of car use in the Borough, infrastructure provision is key to supporting sustainable growth aspirations of the Borough, in particular at Stafford and Stone. Notably the two major transport schemes identified in the adopted plan are the Stafford Western Access Route and the Stafford Eastern Access Route, which will reduce congestion throughout the strategic transport network.
- 7.91 In terms of sustainable transport options available throughout the Borough, the town’s accessibility on the West Coast Main Line provides residents with access to London in 80 minutes, Manchester in 55 minutes and Birmingham in 30 minutes. It is also noted that Stafford station has been identified as an integrated High Speed station for the new High Speed 2 (HS2) rail link, which will reduce journey times to London Euston to under an hour, whilst generating additional capacity on other routes. There is also a railway station in Stone. Bus services are most accessible in the main settlements of Stafford and Stone; having bus stations with frequent services extending to the surrounding towns and villages.

- 7.92 Options 3(high) and 3(low), and to a lesser extent 5(high) and 5(low), will therefore lead to long-term positive effects through ensuring that the right proportion of development is directed to the most appropriate settlements; capitalising upon the sustainable transport offer and forthcoming infrastructure improvements discussed above, and supporting lower levels of car use. Providing safe, attractive and convenient sustainable connections from and to new developments will likely encourage modal shift and the uptake of sustainable travel and active travel. Notably, high growth at Stafford and Stone will assist in avoiding long distance trips that would potentially increase the overall levels of congestion on the road network.
- 7.93 An appropriate amount of development is also allocated through Options 3(high) and 3(low) to the lower tier settlements, with a low level of growth directed to the Borough's rural areas, recognising that in many rural areas there is often no accessible sustainable transport offer. Conversely, Options 6(high) and 6(low), through focussing growth at settlements linked by existing transport corridors, seeks to expand less sustainable settlements; notably a high proportion of tier 4-6 settlements feature in the four potential 'transport corridors' for focussed growth, while Stafford (tier 1 settlement) does not appear at all in the 'A51 corridor'. While these transport corridors would expand upon the highly utilised, lateral A-road network; it is recognised that the settlements identified for growth under Options 6(high) and 6(low) are not particularly sustainable, and Options are therefore likely to perform less well against this SA Theme. This is given the existing poor access to community facilities at a number of targeted settlements, and often no realistic alternative mode of transport to the car.
- 7.94 In terms of the delivery of at least one New Garden Community (Options 5(high), 5(low), 6(high), and 6(low)), depending on location, these may or may not be close to existing sustainable transport corridors. As such it is difficult to come to any definitive conclusions in terms of impact on this SA Theme. However, it is recognised that Garden City principles should be followed; which include high quality design, whilst delivering new infrastructure to meet residents' need. This could result in higher levels of self-containment, leading to positive effects in terms of reducing the need to travel and encouraging modal shift.
- 7.95 In terms of high and low growth Options, at this stage it is considered that as the level of growth increases so does the significance of effects, given that higher growth would result in increased vehicles on the roads and increased levels of congestion. Therefore, Options 3(high), 5(high) and 6(high) perform less well than options 3(low), 5(low) and 6(low). However, it is recognised that there is the opportunity for increased growth to deliver mitigation; i.e. through the provision of sustainable transport infrastructure, road improvements, public transport improvements, etc.
- 7.96 Overall, Options 3(high) and 3(low), followed by Options 5(high) and 5(low), are best performing against this SA Theme. This is given the focus of growth at settlements that provide the best current and future opportunities for achieving sustainable development; while sustaining the surrounding rural areas. All Options contribute positively towards the development of sustainable transport networks, capitalising upon existing transport infrastructure at key locations, and further promoting active travel opportunities through supporting levels of self-containment and reducing the reliance on the car. It is noted that levels of self-containment may be higher through Options 5(high) and 5(low) given the delivery of a New Garden Community; however the location of the New Garden Community, and therefore anticipated residual effects, are unknown.
- 7.97 Option 6(high) followed by 6(low) are identified as the least well performing Options, given the focus on unsustainable settlements low down the settlement hierarchy, prioritising access to A-road transport corridors. This approach appears to overlook preference for public transport, resulting in reliance on the private vehicle for access to services/facilities in larger settlements.

Water resources and water quality

Option 3 (high)	Option 3 (low)	Option 5 (high)	Option 5 (low)	Option 6 (high)	Option 6 (low)
4	3	2	★1	2	★1

- 7.98 The SA water resources and water quality objective seeks sustainable development which minimises pressure on water resources and wastewater, as well as preserving and enhancing the quality of the Borough's watercourses.
- 7.99 The adopted Local Plan notes that there are potential network capacity issues in relation to wastewater, noting that *"a key consideration in terms of new housing development in Stafford is the provision of additional foul sewerage capacity to accommodate new development flows"* and that there could be a need for both localised and strategic network enhancements to increase headroom capacity. It is presumed that these considerations remain applicable given the recent adoption date of the Local Plan.
- 7.100 In terms of potable water supply, the adopted Local Plan notes that clean water supply currently *"has spare capacity"* and that *"no distribution network reinforcement is required"* to support the growth in Stafford town.
- 7.101 In terms of water quality, the Southern Staffordshire Water Cycle Study (2010) identifies that the River Sow and River Meese (in relation to one of its tributaries within the Borough) have been identified as currently having low water quality. The Rivers Sow and Trent have been identified as having 'poor to moderate' ecological status and the Church Eaton Brook, Doxey Brook, Gayton Brook, River Blithe and River Penk as having 'moderate' ecological status.¹⁹ Future development within the catchments of these watercourse may be constrained by abstraction and wastewater treatment limitations.
- 7.102 Growth under all options could have potential implications for water resources and water quality, though the precise nature of effects, and whether such effects could be significant, will be largely determined by the scale, nature and location of the sites ultimately allocated. As such, it is challenging to draw detailed conclusions at this early stage of plan-making.
- 7.103 In light of the above there is little opportunity to significantly differentiate between the options at this stage. However, at a broad conceptual level it is considered that lower growth options may have potential to perform more strongly in relation to water quality and water resources on the basis that they will introduce less additional pressure on existing and future network capacity, though it is recognised that there could be potential to seek increased capacity through the development process.
- 7.104 In terms of the spatial distribution options, it is considered that options which propose delivery of at least one New Garden Community may have potential to perform most strongly on the basis that this will provide a strategic opportunity to deliver bespoke new water infrastructure, potentially including new Wastewater Treatment Works (WwTWs) as appropriate. Options which propose no New Garden Communities would likely necessitate delivery of strategic network enhancements, though there may be greater complexity associated with retrofitting capacity enhancement to existing networks when compared to the potential for front-loaded provision of entirely new infrastructure at a New Garden Community.
- 7.105 On this basis, overall it is considered that the low growth options which propose at least one Garden Community perform most strongly in relation to water resources and water quality, whilst the non-Garden Community high growth options perform least strongly. Significant effects are not anticipated from any of the Options at this stage.

¹⁹ Royal Haskoning (2010), 'Southern Staffordshire Outline Water Cycle Study: Final Report' [online, available at: <https://www.lichfielddc.gov.uk/downloads/file/788/water-cycle-study-2010>]

Conclusions

7.106 **Table 7.1** below presents an overview of the appraisal findings presented across the 13 sections above and also presents overall conclusions.

Table 7.1: Summary appraisal conclusions

Objective	Rank of preference and significant effects					
	Option 3 (high)	Option 3 (low)	Option 5 (high)	Option 5 (low)	Option 6 (high)	Option 6 (low)
Air quality	2	★1	4	3	6	5
Biodiversity	2	★1	2	★1	2	★1
Climate change adaptation	6	5	4	3	2	★1
Climate change mitigation	3	3	★1	2	★1	2
Economy and employment	2	2	★1	2	?	?
Health and wellbeing	★1	★1	★1	★1	2	2
Historic environment	2	★1	2	★1	2	★1
Housing	★1	2	3	4	5	6
Land and soils	2	★1	4	3	6	5
Landscape	2	★1	4	3	6	5
Population and communities	★1	2	★1	2	3	3
Transport	2	★1	4	3	6	5
Water	4	3	2	★1	2	★1

Concluding discussion on the Strategic Options

Overall, potential significant negative effects have been identified for all options with regards to the SA theme of land and soils. This reflects greenfield development as an aspect of all options (given a lack of available brownfield sites) and potential losses of high-quality agricultural land and mineral resources. Across all options these appear to be inevitable consequences of growth in the Borough.

Significant positive effects are anticipated for all options with regards to the SA theme of housing by delivering in full against the minimum housing requirement over the plan period. Options 3(high), 3(low), 5(high) and 5(low) are also considered likely to deliver significant positive effects with regards to the SA theme of economy and employment by distributing new employment floorspace across the Borough. The ability to deliver significant positive effects for the economy and employment SA theme under Options 6(high) and 6(low) however are less certain given the direction of growth away from existing economic and educational hubs.

The appraisal shows Option 3(low) to perform well in respect of the greatest number of objectives, and also to result in significant positive effects in respect of the greatest number of objectives. However, it does not necessarily follow that Option 3(low) is best performing, or 'most sustainable' overall, recognising that the sustainability objectives are not assigned any particular weight. It will be for the decision-maker (Stafford BC) to assign weight and trade-off between the competing objectives ahead of establishing a preferred approach.

Part 3: What are the next steps?

8. Plan finalisation

Preparation of the Draft Plan

- 8.1 Subsequent to the current consultation it is the intention to prepare a preferred option / draft plan and publish that plan for consultation. A second Interim SA Report will be prepared and published alongside. It will be structured in three parts, as per this current Interim SA Report, except that Part 1 will deal solely with the matter of exploring reasonable alternatives, whilst Part 2 will present an appraisal of the Draft Plan.

Preparation of the Proposed Submission Plan

- 8.2 Subsequent to the draft plan consultation the Council will prepare and publish the proposed submission version of the plan in-line with Regulation 19 of the Local Planning Regulations 2012. The proposed submission plan will be that which the Council believes is 'sound' and intends to submit for Examination. The final SA Report will be published alongside the Proposed Submission Plan, providing the information required by the SEA Regulations 2004. The SA Report will be structured as per the preceding Interim SA Report.

Submission and examination

- 8.3 Once the period for representations on the Proposed Submission Plan / SA Report has finished the main issues raised will be identified and summarised by the Council, who will then consider whether in-light of representations received the plan can still be deemed 'sound'. If this is the case, the Plan will be submitted for Examination, alongside a statement setting out the main issues raised during the consultation. The Council will also submit the SA Report.
- 8.4 At Examination the Inspector will consider representations (alongside the SA Report) before then either reporting back on the Plan's soundness or identifying the need for modifications. If the Inspector identifies the need for modifications to the Plan these will be prepared (alongside SA) and then subjected to consultation (with an SA Report Addendum published alongside).
- 8.5 Once found to be 'sound' the Plan will be formally adopted by the Council. At the time of Adoption a 'Statement' must published that sets out (amongst other things) 'the measures decided concerning monitoring'.

Appendix A: Appraisal of Garden Community Options

- 8.6 This appendix presents an appraisal of the competing New Garden Community options in relation to the SA framework established through the scoping exercise (see Table 3.1).
- 8.7 The Garden Community options are listed below and mapped in Figure A1 overleaf.
- **Option A: Gnosall North / East** - This area of land could accommodate up to 3,500 new homes and supporting employment.
 - **Option B: Land between Gnosall and Haughton** - This area of land could accommodate up to 3,250 new homes and supporting employment.
 - **Option C: Seighford** - This area of land could accommodate up to 5,250 new homes and supporting employment.
 - **Option D: Land north of Redhill** - This area of land could accommodate up to 5,000 new homes and supporting employment land.
 - **Option E: Meecebrook** - This area of land could accommodate up to 11,500 new homes and supporting employment land.
 - **Option F: Hixon** - This area of land could accommodate up to 2,750 new homes and supporting employment land.
 - **Option G: Land east of Weston** - This area of land could accommodate up to 2,000 new homes and supporting employment land.
- 8.8 The following Tables look closely at Options A-G and their potential effects on the 13 SA Objectives. In the preparation of these Tables it has been necessary to make the following assumption in terms of delivery, as set out in the New Local Plan Issues and Options document:
- 8.9 Due to the lead-in time between conception and commencement of delivery of the Garden Communities it will be necessary to effectively split the Plan Period into two distinct Phases:
- The first phase (2020-2030) will assume no contribution from any Garden Community option either individually or in combination. Accordingly, during the first phase the Borough will be dependent on the delivery of housing via conventional land supply.
 - At this stage of plan preparation the second phase (2031-2040) of the plan period is anticipated to deliver 3,000 dwellings at least one New Garden Community.

Project Title:

SA OF THE NEW STAFFORD LOCAL PLAN

Client:

STAFFORD
BOROUGH COUNCIL

LEGEND

 Potential New
Garden Community
options

 Stafford Borough
Council LPA
boundary

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AECOM Internal Project No:

60617694_001

Drawing Title:

STAFFORD POTENTIAL GARDEN COMMUNITY OPTIONS

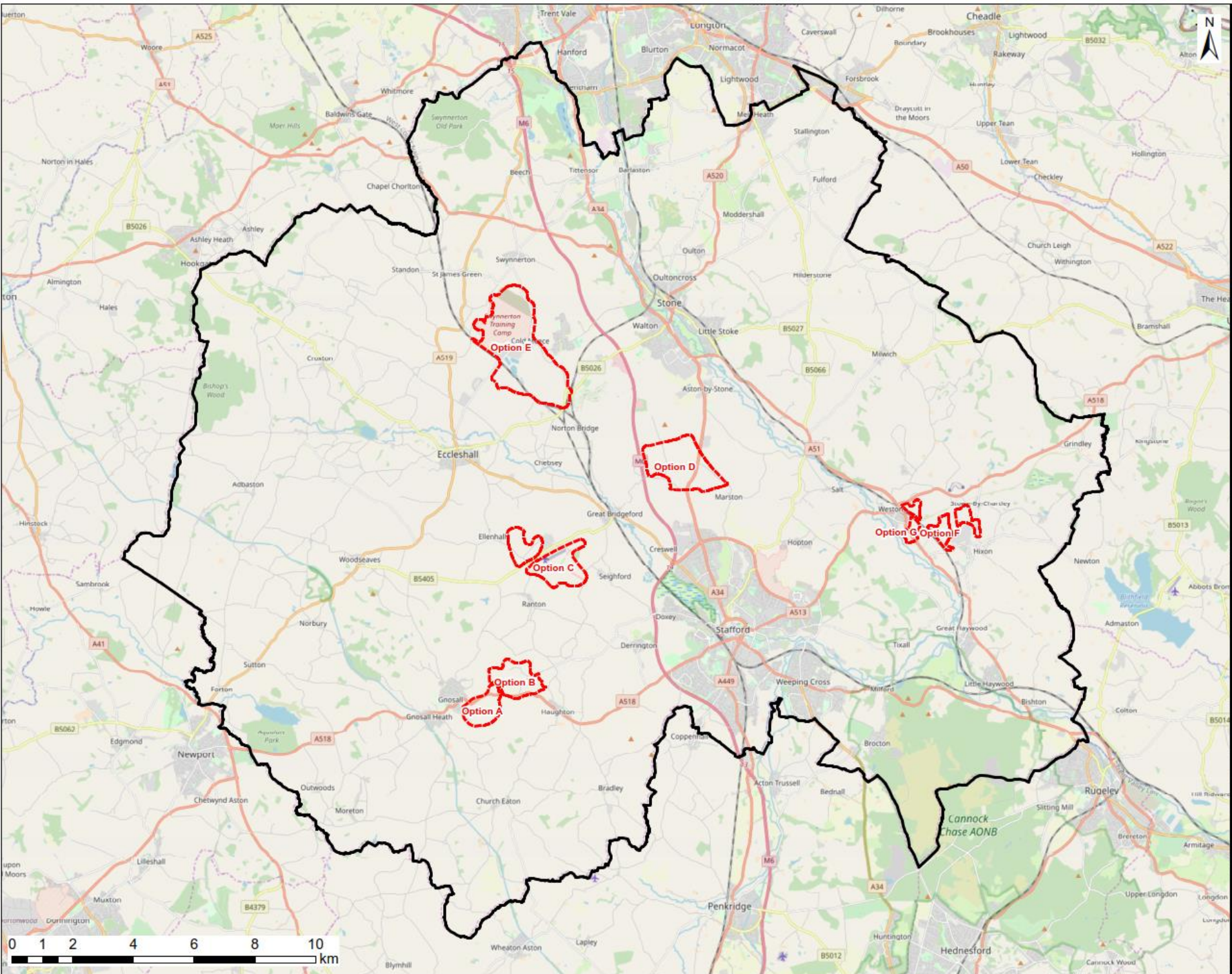
Scale at A3: 1:115,000

Drawing No:

FIGURE A1

Drawn: Chk'd: App'd: Date:

BM AM CM 18/12/19



SA Objective 1: Air Quality							
Options	A. Gnosall North / East	B. Land between Gnosall & Haughton	C. Seighford	D. Land north of Redhill	E. Meecebrook	F. Hixon	G. Land east of Weston
Rank	2	2	3	1	1	2	2
Significant effect?	No	No	No	No	No	No	No
Discussion	<p>The plan area does not have any Air Quality Management Areas (AQMAs) but has potential to be affected by air pollutants. It is therefore important to ensure that the anticipated level of growth in the Borough do not adversely affect air quality. Given the relatively rural nature of the Borough, it is considered that there is, and will continue to be, a reliance on the private vehicle for travel; however, where possible, the Council will seek to minimise additional car journeys arising from new development and support active travel, capitalising on opportunities for sustainable travel where possible (e.g. new bus services associated with major development). The performance of the options in terms of access to sustainable travel options and the existing road network (notably the rail network, M6 corridor and key A/B roads) is discussed under Objective 12. Options D and E are located in good proximity to major roads (with bus services) and railway lines given their location between Stone and Stafford. Options D and E therefore perform most strongly, as they are most likely to minimise additional air pollution in the Borough as residents would likely have less need to travel by car to access employment, services and amenities, both within and outside of the Borough.</p> <p>It is difficult to differentiate between Options A, B, F, and G, given that all are located in close proximity to smaller settlements with limited access to sustainable travel options, with the exception of local bus services.</p> <p>Option C performs marginally less positively in this respect given the Option is located along a B-road, 8km from Stafford, with only limited accessible bus services. As such, car reliance is likely to be extremely high, resulting in traffic-related impacts including air pollution as residents travel to access employment, services and amenities.</p> <p>However, it is also recognised, as discussed under Objective 12, that, in the longer term, a New Garden Community could become relatively self-contained with an adequate provision of infrastructure to serve the new development including some employment. This could potentially include the provision of electric vehicle charging (EVC) and strong broadband connectivity, for example, which could facilitate working from home and therefore minimising additional private car journeys and related air pollution. However, these effects would most likely begin to be felt towards the end of the plan period/beginning of the next as the new community developed including its infrastructure developed. It is noted that the UK proposes banning all new petrol and diesel cars and vans from 2040, with a presumed increase in electric/hybrid vehicles in the interim.</p>						

SA Objective 2: Biodiversity							
Options	A. Gnosall North / East	B. Land between Gnosall & Haughton	C. Seighford	D. Land north of Redhill	E. Meecebrook	F. Hixon	G. Land east of Weston
Rank	2	2	3	3	1	3	4
Significant effect?	Uncertain	Uncertain	Uncertain	Uncertain	Uncertain	Uncertain	Uncertain
Discussion	<p>It is assumed that a New Garden Community in the Borough would not result in the loss of any international, national or locally designated sites for biodiversity. Nonetheless, a primary consideration is the potential for a new settlement to impact on the following European designated sites within Stafford Borough (through a mechanism other than direct land take): Cannock Chase SAC; Pasturefields Saltmarsh SAC; Motte Meadows SAC; Chartley Moss SAC; Chartley Moss Ramsar Site; Cop Mere Ramsar Site; and Aqualate Mere Ramsar Site.</p> <p>The potential for impacts on these sites is being explored in detail through a stand-alone Habitats Regulations Assessment (HRA), but suffice to say that:</p> <ul style="list-style-type: none"> • All options lie (partially or wholly) within the Cannock Chase SAC 15km buffer. Research has shown that 75% of all visitors to the Cannock Chase SAC are from within a 15km radius of the SAC. The planned level of residential growth within a 15 km radius from the edge of Cannock Chase SAC is likely to have a significant effect on the SAC in the absence of mitigation. In accordance with Policy N6 of the Local Plan Part 1, “<i>all development that leads to a net increase in dwellings must take all necessary steps to avoid or mitigate any adverse effects upon the SAC's integrity.</i>” • Option G (Land east of Weston) is located 2.5km from West Midlands Mosses SAC, the Midland Meres & Mosses - Phase 1 Ramsar Site (outside of the Borough boundary) and Chartley Moss SSSI. Supplementary advice on the conservation objectives for the SAC state that the site is considered to be sensitive to changes in air quality.²⁰ <p>Focusing on biodiversity considerations other than those that relate to European designated sites, a number of Options are associated with constraints. The following considers notable Options in alphabetical order -</p> <ul style="list-style-type: none"> • Option A - This Option is in close proximity to the Doley Common SSSI and Allimore Green Common SSSI. • Option B - This Option is in close proximity to the Doley Common SSSI and Allimore Green Common SSSI. • Option C - There are pockets of ancient woodland on the southern and western edge of this Option, with pockets of woodland priority habitat located centrally. The Option is within the SSSI impact risk zone of Doxey and Tillington Marshes SSSI. Seighford Moor local wildlife site is in close proximity. • Option D - This Option is 2km from the Doxey and Tillington Marshes SSSI and contains small areas of Deciduous Woodland priority habitat. • Option E - No notable biodiversity constraints identified. • Option F - Option F is within the SSSI impact risk zone of Pasturefields Salt Marsh SSSI and Chartley Mosses SSSI; and • Option G - Option G is within the SSSI impact risk zone of Pasturefields Salt Marsh SSSI and Chartley Moss SSSI. 						

²⁰ Natural England (2016), European Site Conservation Objectives: Draft supplementary advice on conserving and restoring site features, 27 July 2016 West Midland Moss SAC, site code UK0013595

	<p>While the potential for adverse effects is identified for the majority of Options; it is also recognised that the delivery of a New Garden Community could avoid negative effects on the Borough's biodiversity resource. Notably, strategic sites have the potential to deliver mitigation measures to offset impacts on the Cannock Chase SAC, such as providing Suitable Alternative Natural Green Space (SANGs), largely for walkers and dogwalkers, in locations around the SAC.²¹ Positive effects may also be delivered through enhancement measures, including net gain, secured at a strategic scale. The scope for this is currently uncertain, and therefore at a Borough-wide scale it is difficult to differentiate between the Options. Ultimately the nature and significance of effects will be dependent on the design/ layout of development as well as the implementation of mitigation measures, with ecology surveys likely to be required at the planning application stage. However (with the exception of potential effect on the Cannock Chase SAC), it is noted that Option E stands out as being notably free of biodiversity sensitivity, while Option G is identified as worst performing given the potential to impact upon Cannock Chase SAC, West Midlands Mosses SAC, and the Midland Meres & Mosses - Phase 1 Ramsar Site .</p>
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SA Objective 3: Climate change adaptation

Options	A. Gnosall North / East	B. Land between Gnosall & Haughton	C. Seighford	D. Land north of Redhill	E. Meecebrook	F. Hixon	G. Land east of Weston
Rank	2	2	3	1	3	3	4
Significant effect?	No	No	Uncertain	No	Uncertain	Uncertain	Uncertain
Discussion	<p>In terms of climate change adaptation, a key issue is flood risk. Taking each Option in turn -</p> <p>Options A and B - These Options include low to high surface water flood risk from existing drains.</p> <p>Option C - The northern part of this Option and parts of the south / south eastern part of the Option are located in Flood Zones 2 and 3 associated with the Gamesley and Hextall Brooks.</p> <p>Option D - This Option is at low risk of flooding.</p> <p>Option E - The Meece Brook and associated tributary flow through the centre of the Option. The floodplain either side of these watercourses is defined as Flood Zone 2 and 3, and there are a large number of ponds adjacent to the watercourses. The remainder of the Option is defined as Flood Zone 1. The risk of surface water flooding mapping identifies surface water ponding on the site. The Surface Water Management Plan (2010) identifies frequent flooding within the area of the Option.²²</p> <p>Option F - The Amerton Brook flows through the north west corner of the Option. This area of the Option is within Flood Zones 2 and 3. Any proposed development should be set back from this area, which is also Deciduous Woodland priority habitat. The Amerton Brook flows towards the A51; options for accessing the site from the A51 may be constrained by the Amerton Brook.</p> <p>Option G - A significant proportion of the Option is in Flood Zone 3 associated with the Trent and Mersey Canal and its tributaries. Parts of the Option, along the A51 corridor and in the north east, are substantially less constrained in this respect, however large parts of the site will not be suitable for development.</p> <p>It is considered that, in line with higher level planning policy, the Council will seek to direct development away from areas at highest risk of flooding. As set out in the NPPF (2019) "all plans should apply a sequential, risk-based approach to the location of development - taking into account</p>						

²¹ Cannock Chase SAC Visitor Impacts Mitigation Report [online] available at: <https://www.staffordbc.gov.uk/sites/default/files/cme/DocMan1/Planning%20Policy/Further%20Information%20and%20Evidence/Habitats%20Regulation%20Assessment/Cannock-Chase-SAC-Visitor-Impacts-Mitigation-Report.pdf>

²² Stafford Borough, Lichfield District, Tamworth Borough, South Staffordshire District and Cannock Chase District Councils (2010) Southern Staffordshire Surface Water Management Plan [online] available at: https://www.sstaffs.gov.uk/doc/171944/name/SWMP_FINAL1.pdf/

<p><i>the current and future impacts of climate change - so as to avoid, where possible, flood risk to people and property”.</i></p> <p>All New Garden Community Options are of a scale which could incorporate measures used to help adapt to climate change, for example urban cooling, sustainable drainage and the delivery of green infrastructure. It has been found that, by greening and cooling the urban environment, negative impacts on human health due to global climate change can be reversed.²³ However at this stage it is not possible to differentiate between the Options. in this respect.</p> <p>Overall, Option D is best performing given it is not constrained in terms of flood risk. Options A and B are the next best performing Options, as, although both are constrained in terms of surface water flooding, they are not at risk of fluvial flooding. Option G is worst performing given that a significant proportion of the option is located in Flood Zone 3. It is however difficult to differentiate between Options C, E and F at this stage.</p>
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SA Objective 4: Climate change mitigation

Options	A. Gnosall North / East	B. Land between Gnosall & Haughton	C. Seighford	D. Land north of Redhill	E. Meecebrook	F. Hixon	G. Land east of Weston
Rank	4	4	2	3	1	5	6
Significant effect?	No	No	No	No	No	No	No
Discussion	<p>There is a need to minimise per capita CO₂ emissions from transport, and the built environment. In respect of the former, there is little to add to the discussion presented below, under ‘Transport’. In respect of the latter, a key consideration is the need to support larger developments - in excess of 500 homes – as their size could provide the economies of scale that make delivery of decentralised heat and power generation a possibility. All Options therefore perform positively in this respect given the New Garden Communities proposed, and are ranked based on level of growth - with highest level of growth (Option E) performing most positively, and lowest level of growth (Option G) performing least positively.</p>						

SA Objective 5: Economy and employment

Options	A. Gnosall North / East	B. Land between Gnosall & Haughton	C. Seighford	D. Land north of Redhill	E. Meecebrook	F. Hixon	G. Land east of Weston
Rank	2	2	2	1	2	2	2
Significant effect?	Yes - positive	Yes - positive	Yes - positive	Yes - positive	Yes - positive	Yes - positive	Yes - positive
Discussion	<p>All Options will offer potential to deliver new employment land, potentially at a strategic scale. This will likely have positive effects in relation to a number of aspects of the local economy. Notably, the addition of new employment land will boost the vitality of the local economy, enhancing the overall mix of types and sizes of employment floorspace in the Borough. In this sense, there could be</p>						

²³ [S. M. Charlesworth](http://dx.doi.org/10.2166/wcc.2010.035) (2010) A review of the adaptation and mitigation of global climate change using sustainable drainage in cities; Journal of Water and Climate Change 1 (3): 165-180 [online] available at: <http://dx.doi.org/10.2166/wcc.2010.035>

benefits from seeking a Garden Community location from which access to Stafford, as the primary settlement, is quickest and most simple. This could help encourage the development of economic synergies between the New Garden Community and the Borough's main economic hub over time. In this light, **Options A, B, D, G and F** are considered to benefit from direct access via A-roads to central Stafford. Alternatively, **Option E**, which is furthest from Stafford and also the largest of the Options, may benefit from the autonomy such distance affords, enabling it to develop its own distinct profile as an employment and economic entity and contributing to its long-term viability and vitality. However it is recognised that the level of employment to be delivered through any of the Options is currently unknown. **Option C** is considered to perform marginally less well on the basis that it does not have direct A-road or rail access to Stafford or Stone whilst also being potentially too small to establish itself as an economically autonomous settlement.

Additionally, the forthcoming HS2 link will serve Stafford and is anticipated to be operational within the plan period. HS2 is predicted to bring London within 50 minutes travel from Stafford as well as enhancing connectivity with regional economic centres, particularly Birmingham. This will unlock significant development opportunities for the Borough, with the most notable being the Stafford Station Gateway Growth Area which is projected to deliver up to 6,500 jobs along with around 800 new homes at a 28ha site adjacent to the station. There are therefore likely to be benefits associated with locating New Garden Communities within good proximity of Stafford station and capitalising on the economic opportunities which will be unlocked by HS2, both in terms of existing planned economic growth such as the Gateway Growth Area and in terms of maximising the potential yield from economic activity within a New Garden Community. In this context, **Option D** again performs strongly on the basis that it would be very close to the HS2 station in central Stafford (only around 3km away). There also may be opportunity to establish high frequency public transport shuttles between the New Garden Community and the HS2 station to maximise the potential economic benefits arising from HS2. **Option E** performs weakest in this regard as it is furthest from the station at around 18km, and has no direct road access.

On balance, it is considered that **Option D** may perform most strongly overall in relation to Economy and Employment. While it is recognised that **Option E** is the largest of the Options in terms of housing delivery, assumptions cannot be made in relation to employment delivery at this stage. As such, all other Options perform broadly on a par, with significant positive effects anticipated from each of the Options.

SA Objective 6: Health and wellbeing

Options	A. Gnosall North / East	B. Land between Gnosall & Haughton	C. Seighford	D. Land north of Redhill	E. Meecebrook	F. Hixon	G. Land east of Weston
Rank	1	1	2	2	2	2	2
Significant effect?	No	No	No	No	No	No	No
Discussion	<p>The establishment of a New Garden Community would provide opportunities to seek the strategic delivery of green infrastructure, including connecting with and enhancing existing green infrastructure networks in the Borough. Green infrastructure offers significant opportunities to embed healthy modes of travel into new development, positioning walking and cycling as viable and attractive alternatives to the car.</p> <p>Whilst all options broadly offer the same theoretical potential for internal green infrastructure provision, it is considered that Options A and B are best located to take advantage of links with the existing network via access to the Stafford to Newport Greenway, a former railway line which has been repurposed as a walking and cycling path. This would present either Option with a ready-made green infrastructure corridor by which to access nearby higher tier service centres and could potentially be enhanced further through contributions from development under either Option. The Greenway passes through the centre of Option A and adjacent to Option B, offering potential to design and integrate strategic green infrastructure connectivity into the heart of a New Garden</p>						

Community at either Option. This could mean journeys to Newport (to the west) and Stafford (to the east) could be cycled for leisure, to access services or to commute to work. All other Options offer less clear potential for integration with the existing green infrastructure network.

Given the strategic scale of growth proposed, it is considered that all Options have potential to deliver new healthcare facilities and to facilitate local access to such facilities through walking and cycling where possible. All Options could also offer the potential to link with the wider Public Rights of Way (PRoW) network with associated benefits for both physical and mental wellbeing.

Much of the eventual performance of the Options in relation to the health and wellbeing SA theme will be determined by the design and layout of future schemes as well as other details to be addressed through the planning process. In this sense there is little to meaningfully differentiate between the Options at this stage other than in terms of access to existing green infrastructure networks. Positive effects are anticipated from all Options in relation to health and wellbeing, though these are not considered likely to be significant in nature.

SA Objective 7: Historic environment

Options	A. Gnosall North / East	B. Land between Gnosall & Haughton	C. Seighford	D. Land north of Redhill	E. Meecebrook	F. Hixon	G. Land east of Weston
Rank	3	3	2	1	2	1	2
Significant effect?	Uncertain	Uncertain	Uncertain	No	Uncertain	No	Uncertain

Discussion

A primary consideration is the need to avoid impacts on the setting of designated Conservation Areas and clusters of Listed Buildings. Impacts on individual Listed Buildings are also a consideration, although it will often be possible to avoid or sufficiently mitigate impacts through masterplanning, design and landscaping. Having made these initial points, the following Options are of note -

Option A - In the context of the Strategic Development Site Options Report (2019), Historic England has indicated that development at this location has the potential to affect the intrinsic qualities, including the setting, of multiple heritage assets directly or indirectly; including Listed Buildings, Scheduled Monuments, Gnosall Conservation Area, Canal Conservation Area, undesignated assets etc.

Option B - There is a Grade II listed building (Woodhouse Farmhouse) within the boundary of the Option. Historic England has indicated that development has the potential to affect the intrinsic qualities, including the setting of multiple heritage assets directly or indirectly, including Listed Buildings, Scheduled Monuments, Gnosall Conservation Area, Canal Conservation Area, undesignated assets etc.

Option C - There are two designated heritage assets within the Option, the Hextall moated Scheduled Monument and fishponds, and the Grade II Listed milepost on Stafford Newport Road.

Option E - The Option contains seven Grade II Listed Buildings. Swynnerton Park to the north forms part of the setting of the Grade I Listed Swynnerton Hall.

Option G - There are two designated heritage assets within the site, a Grade II Listed Building in the south-east corner of the site, and the Trent and Mersey Canal Conservation Area in the south-west part of the site.

While it has been identified that development at the majority of Options have the potential to impact on the rural setting, character, and integrity of designated assets, appropriate design could mitigate some of that harm. The delivery of a New Garden Community has the potential to positively affect

<p>the historic environment through regeneration; preserving, and where possible, enhancing the significance of assets. Notably, the redevelopment of brownfield components of sites has good potential for townscape improvements, and positive effects such as increased awareness and access-This however is uncertain at this stage.</p> <p>Overall, Options D and F perform most positively given they are notably free of heritage sensitivity. Options A and B are worst performing given the concerns raised by Historic England in relation to multiple heritage assets; including two Conservation Areas. It is difficult to differentiate between Options C, E and G given that they are similarly constrained. Ultimately, it is considered that the significance of effects will be dependent on the design/ layout of development as well as the implementation of mitigation measures.</p>

SA Objective 8: Housing

Options	A. Gnosall North / East	B. Land between Gnosall & Haughton	C. Seighford	D. Land north of Redhill	E. Meecebrook	F. Hixon	G. Land east of Weston
Rank	=	=	=	=	=	=	=
Significant effect?	Yes - positive	Yes - positive	Yes - positive	Yes - positive	Yes - positive	Yes - positive	Yes - positive
Discussion	<p>It is difficult to meaningfully differentiate between the Options in terms of the potential to support the achievement of housing objectives. Depending on which Option(s) are chosen, (delivery may come from a combination of Garden Communities), it is assumed that the same level of growth would be delivered within the plan period, i.e. 3,000 dwellings in total. This level of delivery would provide opportunities to achieve a broad mix of housing types and tenures (to include a proportion of affordable housing in accordance with policy). Significant positive effects are anticipated under all Options.</p>						

SA Objective 9: Land, soils and waste

Options	A. Gnosall North / East	B. Land between Gnosall & Haughton	C. Seighford	D. Land north of Redhill	E. Meecebrook	F. Hixon	G. Land east of Weston
Rank	2	1	2	2	2	2	2
Significant effect?	Yes - Negative	Yes - Negative	Yes - Negative	Yes - Negative	Yes - Negative	Yes - Negative	Yes - Negative
Discussion	<p>It is considered that while growth proposed under all Options is likely to be predominately greenfield development, brownfield land will be utilised where possible. Options A, B and G are wholly greenfield, and therefore perform least positively in this respect; however there is potential to capitalise upon brownfield land at the following Options -</p> <p>Option C - Existing land use: agricultural, airstrip and industrial.</p> <p>Option D - Existing land use: includes some sparse/small residential and employment areas.</p>						

Option E - Existing land use: landfill at the northern edge of the site, MOD training camp in the northern half of the site, with small areas of employment, residential and agriculture throughout the southern half of the site.

Option F - Existing land use: disused airfield, with temporary uses.

Stafford Borough has a high proportion of best and most versatile (BMV) agricultural land and, while there is a need to conserve this resource, it is recognised that all Options are constrained to some extent, with the potential to result in some loss. Taking each Option in turn -

Options A, B and F - These Options are Grade 3 agricultural land. However, it is uncertain if this is Grade 3a (land that is BMV) or Grade 3b (land that is not).

Option C - The northern tip of the Option is Grade 2 very good quality agricultural land; the remainder is largely Grade 3 good to moderate quality agricultural land.

Option D - Mostly Grade 3 good to moderate quality agricultural land with some areas of Grade 2 very good quality agricultural land. However, it is uncertain if the Grade 3 land is Grade 3a (land that is BMV) or Grade 3b (land that is not)

Option E - The Option is largely Grade 2 and 3 BMV agricultural land. However, it is uncertain if the Grade 3 land is Grade 3a (land that is BMV) or Grade 3b (land that is not).

Option G - Central part of Option is Grade 4 poor quality agricultural land, with remainder of Option Grade 3 agricultural land. However, it is uncertain if the Grade 3 land is Grade 3a (land that is BMV) or Grade 3b (land that is not).

Staffordshire has significant mineral resources and, as result of the location of those resources relative to markets for those minerals, there has been significant quarrying and mining within the County. The Minerals Local Plan for Staffordshire (2017) is required to take a positive approach that reflects the presumption in favour of sustainable development in the NPPF (2019), which involves meeting objectively assessed needs for minerals. Mineral Safeguarding Areas (MSAs) exist throughout Stafford Borough, partially coinciding with all Options (with the exception of **Option B**). Taking each in turn -

Option A - South western extent of the Option is within a MSA for Sand and Gravel.

Option C - The majority of the Option is within an MSA for Sand and Gravel.

Option D - North eastern area and parts of the western extent are within a MSA for Sand and Gravel.

Option E - Approximately half of the Option is within an MSA for Sand and Gravel.

Option F - Approximately 60-70% of the Option is within an MSA for Sand and Gravel.

Option G - All but a small section in the far east of the Option is within a MSA for Sand and Gravel.

It is not possible to differentiate between the Options in terms of the management of waste.

Overall, it is difficult to meaningfully differentiate between the Options at this stage, with all Options anticipated to lead to significant negative effects on this SA theme due to the loss of greenfield or BMV agricultural land. Specifically, while **Options A, B and G** perform less positively than other Options through being located entirely on greenfield land, **Options C, D, and E** also perform less well as they contain high quality agricultural land. **Option B** is the only Option not constrained by a MSA, and is therefore considered best performing.

SA Objective 10: Landscape							
Options	A. Gnosall North / East	B. Land between Gnosall & Haughton	C. Seighford	D. Land north of Redhill	E. Meecebrook	F. Hixon	G. Land east of Weston
Rank	2	2	3	3	3	1	3
Significant effect?	Uncertain	Uncertain	Uncertain	Uncertain	Uncertain	No	Uncertain
Discussion	<p>The primary landscape issue locally is the Cannock Chase Area of Outstanding Natural Beauty (AONB), which extends across the south eastern part of the Borough, and also serves to constrain a significant area of land that falls within its setting. Of the Options, Options F and G are considered to have the potential to lead to adverse effects on the AONB given both are located within 4km of the designated site. All other Options are located considerably further away from the AONB, to the north, west and south west of the Borough.</p> <p>However, moving beyond AONB considerations, and considering the sites in the context of the local landscape; the Strategic Development Site Options Report (AECOM, 2019), informed by the Planning for Landscape Change SPD (2001) assesses the overall landscape sensitivity with respect to the Options. Taking each Option in turn, the Site Options Report concludes -</p> <p>Option A - The landscape value of the Option and its susceptibility to development is assessed as medium sensitivity. The visual value of the landscape and its susceptibility to development is assessed as low sensitivity.</p> <p>Option B - The landscape value of the Option and its susceptibility to development is assessed as medium sensitivity. The visual value of the landscape and its susceptibility to development is assessed as low sensitivity.</p> <p>Option C - The Option has a medium sensitivity to development in terms of landscape value and susceptibility to accommodate change in the open character of agricultural fields and the gliding airstrip. The low lying position of the Option and areas of mature vegetation aid in reducing the visibility of the area, and it is enclosed in relation to the wider surrounding landscape;</p> <p>Option D - The landscape value of the Option and its susceptibility to development is assessed as medium sensitivity.</p> <p>Option E - The Option has a medium landscape sensitivity in terms of landscape value and susceptibility to development.</p> <p>Option F - The Option has low landscape value and low sensitivity to development. The dismantled railway to the north, railway to the west, Stowe Lane to the east and the Airfield Industrial Estate to the south provide defensible boundaries and a high level of potential containment.</p> <p>Option G - The Option has a medium landscape value and medium susceptibility to development resulting in a medium landscape sensitivity. The low lying position of the option and areas of mature vegetation aid in reducing the visibility of part of the site, although proximity to Weston and views from the valley sides on the opposite side of the River Trent result in a high visibility of the western part of the option.</p> <p>All Options have the potential to mitigate against adverse effects to some extent, and deliver residual positive effects, through providing for the conservation and, where appropriate, enhancement of local landscapes. This could include through the provision of new/ improved green infrastructure and ecological connectivity, enhancing existing and creating new green linkages.</p> <p>Overall, in terms of ranking the Options, it is considered that Option F is best performing as it is the only Option with both a low landscape value and low sensitivity to development. Options A and B also perform well against the Landscape SA theme given they are of low visual sensitivity; however both Options A and B are of medium sensitivity in terms of landscape value. It is difficult to differentiate between all other Options at this stage as all are of medium sensitivity in terms of</p>						

landscape value and visual sensitivity. Ultimately, it is considered that the significance of effects will be strongly dependent on the design/ layout of development as well as the implementation of mitigation measures.

SA Objective 11: Population and communities

Options	A. Gnosall North / East	B. Land between Gnosall & Haughton	C. Seighford	D. Land north of Redhill	E. Meecebrook	F. Hixon	G. Land east of Weston
Rank	1	1	2	2	2	2	2
Significant effect?	Yes - Positive	Yes - Positive	Yes - Positive	Yes - Positive	Yes - Positive	Yes - Positive	Yes - Positive
Discussion	<p>Depending on which Option(s) are chosen, (delivery may come from a combination of Garden Communities), it is assumed that the same level of growth would be delivered within the plan period, i.e. 3,000 dwellings in total, with potential for further phases of growth in future plan periods. Growth at this scale offers potential to secure significant new community infrastructure, potentially including schools, healthcare and sports and recreation facilities. There could also be potential for development at this scale to secure financial contributions to off-site community infrastructure provision in other settlements in the Borough. On the basis that all Options are assumed to deliver the same quantum of growth within the plan period, it is considered that all offer broadly similar potential to achieve significant delivery of new community infrastructure and therefore that it is not possible to meaningfully differentiate between them at this stage.</p> <p>The establishment of a New Garden Community would also provide opportunities to seek the strategic delivery of green infrastructure, including connecting with and enhancing existing green infrastructure networks in the Borough. Whilst all Options broadly offer the same theoretical potential for internal green infrastructure provision, it is considered that it <i>is</i> possible to differentiate in terms of linking with existing networks. Specifically, Options A and B are both located on the route of the Stafford to Newport Greenway, a former railway line which has been repurposed as a walking and cycling path. This would present either option with a ready-made green infrastructure corridor by which to access nearby higher tier service centres and could potentially be enhanced further through contributions from development under either option. The Greenway passes through the centre of Option A and adjacent to Option B, offering potential to design and integrate strategic green infrastructure connectivity into the heart of a Garden Community at either option.</p> <p>On balance, it is therefore considered that Options A and B perform marginally more strongly than the other options on the basis that they offer the greatest potential to place green infrastructure accessibility at the heart of a future Garden Community, in addition to the potential offered by all options for strategic scale delivery of new services, facilities and community infrastructure within a New Garden Community. Significant positive effects are anticipated under all options in relation to the population and community SA objectives.</p>						

SA Objective 12: Transport

Options	A. Gnosall North / East	B. Land between Gnosall & Haughton	C. Seighford	D. Land north of Redhill	E. Meecebrook	F. Hixon	G. Land east of Weston
Rank	2	2	3	1	1	2	2
Significant effect?	No	No	No	No	No	No	No
Discussion	<p>It is recognised that existing sustainable transport choices which enable access to local services and facilities are largely restricted to more urban locations in the Borough, with rural areas still relying on predominantly on car-based travel. It is therefore considered that Option D, followed by Option E, is best performing given the good access the main towns of Stafford and Stone. Notably, transportation networks/ access links provided at Stafford and Stone include rail connections, the A34, M6 corridor, and the forthcoming HS2 station. Specifically, Stafford rail station provides frequent strategic rail services and Stone station is served by less frequent Crewe to London services. The A51 and A34 local routes connect the Borough to North Staffordshire and West Midlands.</p> <p>It is noted that Option E also has the potential to utilise sustainable transport opportunities within the city of Stoke-on-Trent, to the north.</p> <p>Options E, F and G which would direct growth towards Weston, Hixon and Yarnfield also perform positively given access to the A51, A518, and A519 links to the east and west. Options A and B are also well placed to access the A518 between Stafford and Newport.</p> <p>In the longer term, it is considered that New Garden Community options would have potential to become reasonably self-contained and ensure adequate provision of infrastructure to serve the new development. This might include the provision of electric vehicle charging (EVC) and excellent broadband connectivity, for example, to facilitate working from home and therefore minimising additional private car journeys, minimising associated air pollution. However, these effects would most likely begin to be felt towards the end of the plan period/beginning of the next as the new community developed including its infrastructure developed. However it is noted that the UK has proposed banning all new petrol and diesel cars and vans from 2040, with a presumed increase in electric/hybrid vehicles in the interim.</p> <p>Overall, it is considered that all Options are relatively well located in terms of access to existing transport nodes; however, given the mixed urban/ rural character of the Borough's area, it is recognised that this predominately includes A/B-roads and limited railway links, for example at Options focused around Gnosall (Options A and B) and Hixon and Weston (Options F and G). Options D and E perform most positively in terms of the opportunity to utilise the services and facilities available in Stafford and Stone, which are within easy commuting distance. Option C performs marginally less positively in this respect given the Option is located along a B-road, 8km from Stafford, with only limited accessible bus services. As such, car reliance is likely to be extremely high, resulting in traffic-related impacts as residents travel to access employment, services and amenities.</p> <p>However, all Options will likely support relative self-containment through the delivery of a new 'community' and associated strategic infrastructure delivery, contributing towards meeting local needs.</p>						

SA Objective 13: Water resources and water quality							
Options	A. Gnosall North / East	B. Land between Gnosall & Haughton	C. Seighford	D. Land north of Redhill	E. Meecebrook	F. Hixon	G. Land east of Weston
Rank	=	=	=	=	=	=	=
Significant effect?	Uncertain	Uncertain	Uncertain	Uncertain	Uncertain	Uncertain	Uncertain
Discussion	<p>Stafford Borough falls within the Trent Valley Staffordshire catchment area. It is highlighted that water quality within the catchment area 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.²⁴ In this context, it is noted that an assessment carried out by Severn Trent Water has informed the Strategic Development Site Options Report (2019). Taking each option in turn -</p> <p>Options A and B - Severn Trent has indicated that there is limited environmental capacity in the area (up to 3,000 properties) utilising maximum capacity at Haughton Wastewater Treatment Works (WwTW) and Wood Eaton WwTW.</p> <p>Option C - Severn Trent has indicated that there is highly limited waste water capacity in the area (up to 500 properties) utilising Ladfordfields WwTW, which would not meet proposed growth. Any significant development would have to be transferred to Brancote WwTW.</p> <p>Option D - Severn Trent indicate that the option is remote from a sewerage network, therefore infrastructure would need to be provided. There may be an option to transfer to Brancote WwTW although this is east of Stafford and may require significant infrastructure.</p> <p>Option E - Severn Trent has indicated that the site has a highly limited environmental capacity in the area (up to 3,000 properties) utilising Eccleshall and Sturbridge WwTW. Any significant development would have to be transferred to Pirehill WwTW or Strongford WwTW.</p> <p>Options F and G - The Environment Agency indicates that the Hixon Airfield site partially drains to sewage treatment works that have relaxed permit limits and headroom, however the receiving watercourses have a poor Water Framework Directive (WFD) ecological status which poses a big constraint to additional large scale growth in the catchment.</p> <p>In terms of supply, it is recognised that water companies are legally required to supply water to private consumers and businesses within their area. As set out in the Water Industry Act 1991, they must prepare and maintain a Water Resources Management Plan (WRMP) that sets out how the company intends to maintain the balance between water supply and demand. Water companies update their WRMPs every five years to take account of predicted growth and ensure that there are schemes in place to meet future demands.</p> <p>All Options are therefore anticipated to deliver neutral effects in terms of impact on water resources, with no best performing option identified. This is given the legal requirements in place for WRMPs, and that depending on which Option(s) are chosen, (delivery may come from a combination of Garden Communities), it is assumed that the same level of growth would be delivered within the plan period, i.e. 3,000 dwellings in total. It is expected that development coming forward under any of the Options will be encouraged to be water efficient and may deliver mitigation (for example rain water harvesting measures) to support reduced per capita water usage.</p> <p>Overall, it is recognised that Severn Trent Water identifies that its waste water treatment works do not have the capacity to meet growth anticipated through the delivery of a New Garden Community. It is considered that infrastructure upgrades are likely to be required to support growth over the plan period, however this is uncertain at this stage. All Options are constrained in this respect, and it is therefore difficult to meaningfully differentiate between the Options at this stage.</p>						

²⁴ Trent Rivers Trust (2017) Staffordshire Trent Valley [online] available at: <https://www.trentriverstrust.org/staffordshire-trent-valley/>

Summary and conclusions

The table below presents an overview of the appraisal findings presented across the 13 tables above.

Summary Garden Community appraisal conclusions

SA Objective		Option A - Gnosall North / East	Option B - Land between Gnosall & Haughton	Option C - Seighford	Option D - Land north of Redhill	Option E - Meecebrook	Option F - Hixon	Option G - Land east of Weston
Air quality	Rank	2	2	3	1	1	2	2
	Signif effect?	No	No	No	No	No	No	No
Biodiversity	Rank	2	2	3	3	1	3	4
	Signif effect?	Uncertain	Uncertain	Uncertain	Uncertain	Uncertain	Uncertain	Uncertain
Climate change adaptation	Rank	2	2	3	1	3	3	4
	Signif effect?	No	No	Uncertain	No	Uncertain	Uncertain	Uncertain
Climate change mitigation	Rank	4	4	2	3	1	5	6
	Signif effect?	No	No	No	No	No	No	No
Economy/ employment	Rank	2	2	2	1	2	2	2
	Signif effect?	Yes - positive	Yes - positive	Yes - positive	Yes - positive	Yes - positive	Yes - positive	Yes - positive
Health and wellbeing	Rank	1	1	2	2	2	2	2
	Signif effect?	No	No	No	No	No	No	No
Historic environment	Rank	3	3	2	1	2	1	2
	Signif effect?	Uncertain	Uncertain	Uncertain	No	Uncertain	No	Uncertain
Housing	Rank	=	=	=	=	=	=	=
	Signif effect?	Yes - positive	Yes - positive	Yes - positive	Yes - positive	Yes - positive	Yes - positive	Yes - positive
Land, soil and waste	Rank	2	1	2	2	2	2	2
	Signif effect?	Yes - Negative	Yes - Negative	Yes - Negative	Yes - Negative	Yes - Negative	Yes - Negative	Yes - Negative
Landscape	Rank	2	2	3	3	3	1	3
	Signif effect?	Uncertain	Uncertain	Uncertain	Uncertain	Uncertain	No	Uncertain
Population/ communities	Rank	1	1	2	2	2	2	2
	Signif effect?	Yes - Positive	Yes - Positive	Yes - Positive	Yes - Positive	Yes - Positive	Yes - Positive	Yes - Positive
Transport	Rank	2	2	3	1	1	2	2
	Signif effect?	No	No	No	No	No	No	No
Water	Rank	=	=	=	=	=	=	=
	Signif effect?	Uncertain	Uncertain	Uncertain	Uncertain	Uncertain	Uncertain	Uncertain

Concluding discussion on Garden Community options

Overall, potential significant negative effects have been identified for all Options with regards to the SA theme of land and soils. This reflects greenfield development as an aspect of all options and potential losses of high-quality agricultural land and mineral resources. Across all options these appear to be inevitable consequences of strategic scale growth in the Borough.

Significant positive effects are anticipated for all Options with regards to the SA theme of housing by providing opportunities to achieve a broad mix of housing types and tenures (to include a proportion of affordable housing in accordance with policy).

Options are also considered likely to deliver significant positive effects with regards to the SA theme of economy through the delivery of new employment land within the Borough, potentially at a strategic scale. Option D performs most positively in this respect as it connects particularly well with existing economic hubs, i.e. Stafford. Option D performs most positively against a number of other SA themes as a result of its relative sustainable location; notably air quality and transport.

The appraisal found that there is little to differentiate between the Options at this stage with regard to a number of the SA themes. Where Options have been ranked, Options D and E appear to perform well in respect of the greatest number of objectives, with the exception of Landscape. However, it does not necessarily follow that these Options are best performing, or 'most sustainable' overall, recognising that the sustainability objectives are not assigned any particular weight. It will be for the decision-maker (Stafford BC) to assign weight and trade-off between the competing objectives ahead of establishing a preferred approach.

Appendix B: Review of SA scoping responses and SA Framework updates

The table below presents responses to the SA Scoping Report consultation, before a final table presents the updated SA framework.

N.B. in addition to the matters discussed in the table below, the need to update the SA Scoping Report to better reflect minerals and waste planning considerations was also identified.

Rep Number	Person / Organisation	Section Commented on	Summary of Representation	AECOM response
001	Network Rail	General	<p>Network Rail is a statutory consultee for:</p> <p>(a) Any planning applications within 10 metres of relevant railway land (as the Rail Infrastructure Managers for the railway, set out in Article 16 of the Development Management Procedure Order) and</p> <p>(b) For any development likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway (as the Rail Network Operators, set out in Schedule 4 (J) of the Development Management Procedure Order); in addition you are required to consult the Office of Rail and Road (ORR).</p> <p>Within Transport Assessment's there is usually a review of local needs regarding public transport; this primarily focuses on buses or private vehicular traffic. However, Transport Assessments should also take into account their impact upon footfall at railway stations.</p> <p>Development proposals should be accompanied by a TS/TA which includes consideration of the impact of proposals upon level crossings with mitigation implemented as required. We would encourage the Council to adopt specific policy wording to ensure that the impact of proposed new development (including cumulative impact) on the risk at existing level crossings is assessed by the developer(s), and suitable mitigation incorporated within the development proposals and funded by the developer(s).</p> <p>The council are advised that 'traffic' over a level crossing can be vehicular, pedestrian, cyclists or horse-riders and that proposals do not have to be adjacent to a level crossing to potentially impact the crossing. The council should also be made aware that several proposals over time can also have a cumulative impact upon a level crossing or level crossings in the area, and here, developer contributions could be pooled from several developments to fund mitigation measures.</p>	A matter of policy not SA

002	Ingestre with Tixall Parish Council	SA1, SA2, SA7	<p>SA1: Change wording of point 3 to: 'To sustain <u>and enhance</u> the viability and vitality of Stafford Borough's towns and villages and other communities'</p> <p>SA2: Change wording of P13 to: 'plan positively for the development and infrastructure, <u>especially highways</u>, required in the area to meet the objectives, principles and policies of the framework'</p> <p>SA7: Insert somewhere, e.g. Under 10 Social, health and well-being: Increase the availability of high speed broadband especially in the villages and isolated properties and all new build properties.</p>	Update SA objectives
003	National Grid	General	No comment to make but would still like to be consulted on Development Plan documents.	N/A
004	Mr Thorley	General	It must be made clear that the Council will identify and allocate sites as Local Green Space	Beyond SA scope
005	Gladmans	SA3, SA4	<p>SA3: The baseline data should include all housing completions since 2011.</p> <p>SA4: This section should include housing need and affordable housing provision. This section should also include the threat to rural communities to their future vitality. Including worsening affordable housing, an aging population and a reduction in households with children. Without new market and affordable housing, these communities will be unable to regenerate and prosper.</p>	Update baseline to include previous housing delivery rate per annum (see AMR?). Considered unnecessary to specify in terms of housing types, etc. – this is covered within other evidence documents. The Scoping Report provides a high level overview of the baseline position.
006	Highways England	General	<p>In relation to the Strategic Road Network (SRN), the following would be most of note – Water and Soil, Air, Material Assets and Landscaping, alongside the interrelationship between these factors.</p> <p>Air Quality – Traffic Pollution generated by the M6 motorway around Stafford and Clayton continues to cause the greatest concern but will not fail the standards. The potential M6 managed motorway scheme will need to be assessed in the future with regard to air quality.</p>	Potential to update Environmental Baseline Data table (Chapter 5) and reflect SRN issues within SA objectives.

			<p>Cultural Heritage – Any movements of heritage items or visual disturbances on the existing SRN need to be considered.</p> <p>Landscape Effects – Impacts of landscape and visual amenities for travellers on the SRN need to be taken into account to reduce distractions.</p> <p>Noise Light and Vibration – Direct reference to potential traffic noise pollution should be included.</p> <p>Road Drainage and Water Environment – Highways England have a Policy of not accepting third party connections to their drainage network. Highways England will need to be informed of any flood risk which could affect the SRN.</p> <p>Materials – Details of planned movements and mitigation strategy should be submitted to Highways England.</p> <p>Sustainable Technology - A potential Wind Turbine site has been identified within close proximity to the M6.</p>	<p>Beyond SA scope.</p> <p>Beyond SA scope.</p> <p>Scoping is a high level overview of the baseline position - identified potential schemes are not considered to form part of the baseline at this stage.</p>
007	Dean Lewis Estates c/o Wardell Armstrong	All	<p>General: Stafford Borough is part of the Constellation Partnership which aims to deliver 100,000 new homes and 120,000 jobs by 2040. The SA Plan Objectives should fully embrace this commitment.</p> <p>SA1: The plan objectives should include the following key principles:</p> <ul style="list-style-type: none"> - Regeneration based on a pioneering approach - Meeting housing needs, by providing attractive development propositions - Meeting employment needs; multi-nodal links and sustaining local growth - Revitalisation of the Borough by creating diverse, attractive and attractive developments - Secure sustainable development - Seek environmental benefits through development - Well designed, well connected and resourced development creating a sense of Place. 	<p>Update SA objectives</p>

		<ul style="list-style-type: none"> - Enhancing services and local facilities to enhance sustainability - Optimising established sport, leisure and natural environment destinations - Delivering national governmental objectives, including efficient and prompt re-use of previously used land <p>SA2: Other Plans, policies or programmes</p> <ul style="list-style-type: none"> - Constellation Partnership – Regional scale growth - HS2 Delivery Strategy – infrastructure, investment etc. - Governmental Brownfield regeneration agenda <p>The Government’s commitment to the above was strongly affirmed by the Housing & Planning Minister in 2014 stating that ‘90% of previously used land should be consented by 2020’. The direction of priority has resulted in legislation including the Town & Country Planning (Brownfield Land Register) Regulations 2014. The Housing and Planning Bill 2016 also included a clear commitment ‘To utilising a proactive approach realising the potential for homes on brownfield land’. This is an important aspect to prioritise in that Table 6.3 of the Scoping Report identifies ‘a decreasing percentage of housing completions on PDL’.</p> <p>SA3: Missing or misrepresented data Environmental baseline data ‘Housing completions on PDL’, would more usefully show the decreasing / declining performance by updating the figures (including 2016/7 data which will include data to end of March 2017) and then setting out the 5year trend / outputs. The important output to assess is the rate of decline in performance rather than the unquantified ‘decreasing percentage’.</p> <p>SA4 / 5: Sustainability issues / opportunities Rural sustainability. Planned growth of housing and employment of a scale appropriate to sustaining existing marginal locations. Providing further housing, employment, facilities and services. The importance of Spatial location – North West of the Borough area including the boarder</p>	<p>Update PPP table within the Technical Appendices – however it is recognised that HS2 is referenced with the Scoping Report (i.e. Table 6.2).</p> <p>Potential to update Environmental Baseline Data table (Chapter 5). Include objective which promotes the use of PDL.</p> <p>Consider these to be matters of policy not SA.</p>
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			<p>Stone location is best aligned to seizing opportunities of in particular the HS2 Growth Agenda, and the broader Constellation Prospectus.</p> <p>All realistic options should be considered – including existing recognised Economic Corridors (e.g. Stone to Eccleshall). There are significant opportunities to plan sustainable developments that will enhance vitality and viability as places, e.g. Coldmeece.</p> <p>Seek opportunities that avoid Green Belt development or adding further developments on the edges of Key Service Villages to a degree that they become out-of-scale of a village threshold.</p> <p>Garden Villages are a major opportunity recognised formally by the Constellation Partnership and are well-liked by communities. They are recognised as planned opportunities to diversify the housing offer and potentially offer a modest employment site offer to strengthen rural economy.</p> <p>Ease of access to attractive natural environment is supported as being an important consideration, for example proximate Woodland areas.</p> <p>SA 6 / 7: Targets & Indicators</p> <p>The Sustainability objectives, indicators and targets are supported.</p> <p>It is suggested that Objective 4 should appropriately recognise locational sustainability in a rural context where it does in fact perform a role of an economic corridor including settlements and villages. This appropriately aligns with Economic objective 4.</p> <p>Objective 13 should be geared to achieving appropriate development on PDL. The target proposed of compiling a Brownfield register is in fact a process and not a product. Equally the target of 'promote' should more appropriately be better aligned with the Governmental target of prioritising PDL for development.</p> <p>Further consultation is welcomed</p>	<p>Consider unnecessary to go into further detail within the objectives. Objectives capture the key sustainability issues.</p> <p>As above - to include objective which promotes the use of PDL.</p>
008	Historic England	General	<p>Under the environmental heading on page 2, we recommend that the Council considers the baseline of heritage assets - are there any heritage assets at risk in Stafford, has the Council produced a Local List, are there up to date Conservation Area Appraisals and Management Plans and what actions have been recommended, what</p>	<p>Update baseline to include reference to the HER, heritage at risk, and locally listed heritage assets.</p>

		<p>does the historic environment evidence base say? Have you consulted the Historic Environment Record (HER)?</p> <p>We note that objective 15 on page 4 relates to the historic environment, however, in its current form we consider that it could be difficult to assess proposals against this objective and monitor whether the Local Plan has achieved this objective. We would recommend that the objective references cultural heritage and that it looks at protecting and conserving heritage assets, both designated and non-designated heritage assets. It may be that this would form a new objective 16 and that you keep an objective for landscape and local distinctiveness as well.</p> <p>We would encourage you to consider including the Good Practice Advice Notes from the Historic England website (link below) within your chapter on relevant plans and programmes, as well as the National Heritage at Risk Register.</p> <p>https://historicengland.org.uk/advice/planning/planning-system/</p> <p>Under the section for Local Plans and Programmes on page 14 we would recommend including any historic environment evidence base you may have such as an Extensive Urban Survey and data from the Historic Environment Record, as well as Conservation Area Appraisals and Management Plans.</p> <p>Page 19 refers to buildings at risk and we would recommend that the Council considers what strategies may be appropriate to remove the 8 buildings at risk and how they will be able to 'improve the current position'.</p> <p>Page 33, objective 15 within the table refers to heritage and landscape. As a result it will be difficult to assess what the impact to heritage is as the SA may score a positive for landscape but not for heritage. As mentioned above we would recommend that you have a separate indicator for the historic environment.</p> <p>Additionally, we would recommend that the bullet point refers to protecting and enhancing the significance of heritage assets, including their setting rather than 'adversely affect historic character' and we support the target being 'none'. We further</p>	<p>There are 30 Conservation Areas in Stafford Borough, nine of which have CAAs. While the Scoping Report should be updated to feature these, it is considered unnecessary to capture specific aspects of the CAAs in the Scoping Report.</p> <p>Update objective to reference cultural heritage. Potential for additional objective which looks at protecting and conserving heritage assets, both designated and non-designated heritage assets.</p> <p>Update PPP table within the Technical Appendices.</p> <p>Not considered to be a matter of the SA.</p> <p>As above – include additional objective.</p> <p>Update objectives.</p>
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			<p>support the reference to heritage at risk and the aspiration to reduce the number of buildings at risk.</p> <p>Additionally, we would like to raise that there are three Conservation Areas at Risk in Stafford Borough; Foregate and St. Georges, Trentham and Walk Mill. It would be useful to include this as a baseline figure with a target to reduce the number of Conservation Areas at risk within the life of the Plan.</p> <p>Under the section for 'developing and refining the plan options' on page 38, our comments are similar as to above. It would be more appropriate to have a separate indicator for the historic environment so that the effects can be readily assessed and understood.</p> <p>We would further recommend that there is a section within the SA that looks at what amendments are required to the Local Plan as a result of the SA. For example, there may be policy text amendments as a result of the SA or reductions in the number of dwellings on a proposed site allocation.</p> <p>We support that the SA will include a monitoring section and would recommend that this is included within the Local Plan as an appendix.</p> <p>We would further recommend that the term 'heritage assets' is included within the Glossary and that all types of heritage assets are referenced. 'Historic Parks and Gardens' should read 'Registered Parks and Gardens'.</p>	<p>As above – baseline to be updated.</p> <p>As above – include separate indicator.</p> <p>Comment noted. Not relevant for scoping.</p> <p>Comment noted. Not relevant for scoping.</p> <p>Glossary to be updated. 'Historic Parks and Gardens' to read 'Registered Parks and Gardens'.</p>
009	Environmental Agency	General	<p>Section 4 (and Technical Appendix)</p> <p>The Floods Directive – Details require amending: Preliminary Flood Risk Assessments (PFRAs) were originally published in 2011 and are in the process of being revised for publication in December 2017. The 2011 PFRA for Staffordshire can be viewed here: http://webarchive.nationalarchives.gov.uk/20140328094437/http://www.environment-agency.gov.uk/research/planning/135526.aspx#</p> <p>Flood Risk Management Plans (FRMPs) were published in March 2016. Stafford is covered by the Humber FRMP which can be viewed here:</p>	<p>Update section 4 and Technical Appendix to reflect correct dates.</p>

		<p>https://www.gov.uk/government/publications/humber-river-basin-district-flood-risk-management-plan</p> <p>Local Plans, Policies and Programmes should include the Staffordshire Local Flood Risk Management Strategy which includes policies, objectives and priorities for Staffordshire and an action plan for managing flood risk. It is available here: https://www.staffordshire.gov.uk/environment/Flood-Risk-Management/Local-Flood-Risk-Management-Strategy.aspx</p> <p>Your Strategic Flood Risk Assessment (SFRA) should be included, although this will require updating to support the Local Plan Review.</p> <p>River Basin Management Plans should be included to reflect the current status of the water environment and to inform on the actions identified to bring your waterbodies up to Good Status as required by the Water Framework Directive. The main RBMP that is applicable for your district is the Humber RBMP, but the Severn RBMP also applies for rural development draining to the west. The 2015 RBMPs can be found here https://www.gov.uk/government/collections/river-basin-management-plans-2015</p> <p>Section 6 Issues and Opportunities</p> <p>Environmental – we recommend you include flood risk as an issue. There are around 4,000 people and over 3,000 properties at risk of flooding from rivers within your district. The risk is likely to increase as a result of climate change.</p> <p>We also recommend you include WFD failure as an issue. The Humber and Severn RBMP will provide further detail of the number of waterbodies failing to meet required Good Status.</p> <p>Section 7 Sustainability Objectives, Indicators and Targets</p> <p>There is no reference to protecting the quality of groundwater within Environmental Objectives 11-15. As the requirements of the Humber and Severn RBMPs relate to both surface and groundwater there needs to be a reference to both rather than just rivers. We recommend that Objective 14 is reworded to read “the Borough’s rivers and aquifers...”</p> <p>Although flood risk is included in relation to reducing the effects of climate change (objective 5) there is an existing risk of flooding from rivers and surface water across</p>	<p>Update PPP table within the Technical Appendices to include Staffordshire Local Flood Risk Management Strategy, the Council’s own SFRA, and RBMPs.</p> <p>Update Section 6 (Table 6.3) to include flood risk and WFD failure as key issues.</p> <p>Update objectives</p>
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		<p>the borough which needs to be managed. We suggest this objective is revised to read as follows, and is included within the environmental objectives rather than economic:</p> <p><i>To reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment</i></p> <p>Table 7.1 It is unclear why Objective 5 (page 29) includes a reference to “major aquifers” as an indicator for climate change / flood risk. The majority of Stafford Borough is underlain by Major Aquifers, and any development risk associated with this would be linked to pollution of these groundwaters rather than flood risk. We therefore recommend this reference is removed.</p> <p>As detailed above, should Objective 5 be moved out from the Economic section and into the Environment section, the reference to employment developments should be revised, as all developments within the floodplain will be vulnerable to the effects of flooding, residential even more so than employment uses as identified within the NPPG Table 2 on flood risk vulnerability.</p> <p>With regards to the associated target, we also recommend the reference to major aquifers is omitted. Furthermore, we advise that you consider the phrase “contrary to EA advice” as a more realistic target, rather than a target to have no development on floodplains whatsoever. This is in line with the approach outlined within the NPPF, to allow development on floodplains where certain requirements have been met (such as the Sequential Test and Exception Test). Indeed, the current adopted Local Plan has already allocated development sites on floodplains, therefore this target is already unachievable.</p> <p><i>“the number of employment developments given planning permission on floodplains contrary to Environment Agency advice or major aquifers”</i></p> <p>The Environment Agency can provide data on flood risk objections which can be used to report on this target here https://www.gov.uk/government/publications/environment-agency-objections-to-planning-on-the-basis-of-flood-risk</p> <p>Objective 11: To Reduce Societal Contributions to Climate Change (page 31) proposes as an indicator “number of new developments incorporating water efficiency</p>	<p>Remove reference to “major aquifers”.</p> <p>Update objectives</p> <p>Update target</p>
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		<p>techniques". This is a measure of climate change adaptation not mitigation and should not be used as an indicator for this objective i.e. using too much water does not cause climate change, it reduces our ability to cope with its impacts. Should you wish to use this target, it may better fit within Objective 12: To Protect and Enhance Biodiversity, because the responsible use of water resources will help protect our rivers and associated habitats for water-based ecology. We note this indicator has also be included more correctly under Objective 14.</p> <p>Objective 12: To Protect and Enhance Biodiversity – we recommend that a reference is added into the targets here to increase % of waterbodies meeting Good Ecological Status under the WFD. The associated RBMPs are only updated and reported upon every 6 years however, so this may be difficult to use as an effective indicator.</p> <p>Should Objective 14 be revised as recommended above to include a reference to aquifers as well as rivers, then the associated target regarding WFD standards would cover this issue. However, as discussed above it may be difficult to use RBMP compliance as an effective indicator due to timescales. In addition to this, it should be noted that improvements to aquifer quality are likely to be small / incremental and will not affect overall WFD assessments because the groundwater catchments are larger scale and may be affected more due to issues linked to nitrates and agricultural land use practices. We note that Objective 13: To Protect and Conserve Soil includes a target/indicator to maximizing the percentage of development on previously developed land. This will implicitly lead to improvements in groundwater quality, and as such could also be used as an indicator/target for Objective 14 in specific relation to groundwater quality.</p> <ul style="list-style-type: none"> •Indicator: The number of developments given planning permission contrary to Environment Agency advice relating to river water quality or the protection of groundwater •Target: no planning permissions to be granted contrary to Environment Agency advice on water quality grounds <p>The Environment Agency can provide data on water quality objections which can be used to report on this target here https://www.gov.uk/government/publications/environment-agency-objections-to-planning-on-the-basis-of-flood-risk</p>	<p>Update objectives</p> <p>Updates to target/ indicator</p> <p>As above.</p>
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010	Mr Oliver Dyke C/O Tony Aspbury	General	<p>Having regard to Paragraph 7 of the Framework, stated sustainability objectives at Chapter 7, page 26 should include:</p> <p>Economic: "To ensure that sufficient land and supporting/enabling infrastructure of the right type is available in the right places and at the right time to support growth and innovation."</p> <p>Social Heath & Wellbeing: "To provide the supply of housing required to meet the needs of present and future generations in accessible and sustainable locations."</p> <p>Having regard to the fact that the findings of the Scoping Report finds that the Borough has a high percentage of elderly people (Table 6.1 page 24), it is considered that the Sustainability Objectives (at page 27) should include – under the heading 'Social, Health and Wellbeing' an additional objective: "To significantly improve provision for specialist housing, particularly for the elderly, including those in need of care."</p> <p>Despite The Plan for Stafford Borough including Policy C3 – 'Specialist Housing', housing provision for the elderly, including Continuing Care Retirement Communities, Sheltered Housing, Retirement Villages, Residential Care Homes etc. has failed to keep pace with need and demand which is growing rapidly in absolute and relative demographic terms. As well as more effectively meeting the housing and care needs of the elderly, specialist provision frees up family housing- presently under-occupied by the elderly - relieving some pressure on the new-build sector.</p> <p>The Scoping Report findings with respect to Environmental issues (Table 6.3, page 25) endorse the Representors contention that the Plan for Stafford Borough has failed to effectively deliver new and enhanced green infrastructure, mere allocation being, in itself, inadequate. Greater emphasis is required on policy mechanisms in the development plan that give practical and tangible effect to green infrastructure designation in terms not simply of protection, but also of the active creation, long-term management and protection of new habitats and high quality landscapes and publically accessible spaces, including through development-led/funded initiatives. Accordingly it is proposed that an additional 'Environmental Objective' as follows:</p>	Update objectives
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			<p>“To promote and encourage the creation of new habitats, high quality landscapes and public open space.”</p> <p>Appropriate changes should be made to Table 7.1 to reflect the above as follows:</p> <ul style="list-style-type: none"> • Amount and quality of employment land <p>Target: To maintain at levels to meet projected needs</p> <ul style="list-style-type: none"> • The amount and quality of housing land <p>Target: To maintain at levels to meet objectively assessed needs</p> <ul style="list-style-type: none"> • Number of specialist housing schemes/units for the elderly <p>Target: Increase</p> <ul style="list-style-type: none"> • Number of bio-diverse habitats, attractive landscapes and public/publically-accessible open spaces <p>Target: Increase</p>	Update Table 7.1
011	TEM Property	All	<p>SA1: From an economic development perspective, the objectives for the Local Plan should be to focus on:</p> <ul style="list-style-type: none"> • Ensuring the Plan sets out a level of ambition for housing & employment land which supports Stafford in capturing future job opportunities: Stafford sits within the Midlands Engine area, placing it right at the very heart of the UK economy. With initiatives such as the UK Industrial Strategy and the major investment in HS2, the Midlands has the opportunity to play a major role in delivering national economic success. For Stafford, this means the Local Plan Review needs to set a target for future growth that is ambitious and aligns closely with the Midlands Engine Strategy and LEP Strategic Economic Plan, as well as other emerging initiatives such as the Constellation Partnership and Stafford Gateway. • Fully reflecting the importance of HS2 and the opportunities it creates: Stafford is part of the Constellation Partnership, formerly the Northern Gateway Development Zone, which aims to build on the investment in HS2 and deliver 120,000 new jobs and 	Objectives reflect housing and employment need, and overlap with Midlands Engine objectives where relevant. Consider additional discussion to be beyond SA scope, i.e. matters of policy and availability of sites.

		<p>100,000 new homes by 2040. It is worth highlighting that Stafford currently accounts for around 7.0% of jobs in the Partnership area, and a similar proportion of households. If it was to account for a similar proportion of the 2040 targets, this would represent more than 8,000 new jobs in the Borough and over 7,000 new households. While this is a very high level calculation, it shows the catalytic effect that HS2 can have on the area and the Local Plan needs to be ambitious enough to plan for the right level of housing and employment land to support this. The Local Plan Review needs to give its full backing to initiatives such as this and provide a clear indication as to how it will help in driving them forward.</p> <p>Ensuring the Plan reflects other interventions/developments that will influence growth in Stafford: Growth won't be limited to opportunities arising from the Constellation Partnership. Initiatives such as the Stafford Gateway scheme could see around 6,500 new jobs created in the Borough, while jobs are also likely to be created in the long-term by investment associated with the Midlands Engine and Local Enterprise Partnership. The Midlands Engine has five key objectives to drive growth, for example, and the Local Plan Review needs ensure that it reflects these:</p> <ol style="list-style-type: none"> 1. Improving connectivity to raise productivity. 2. Strengthening skills to make the Midlands a more attractive location for businesses. 3. Supporting enterprise & innovation to foster a more dynamic regional economy. 4. Promoting the Midlands nationally & internationally to maximise trade & investment. 5. Enhancing quality of life to attract & retain skilled workers, as was as fostering the local tourist economy. The Midlands Engine recognises there is a need to provide even more housing for future generations, which requires strong local leadership and commitment from a wide range of stakeholders, including planning authorities, private developers and local communities themselves. The Local Plan Review clearly has a major role in supporting this. <p>Promoting investment: The Local Plan Review needs to create the right environment in Stafford for businesses to invest in and allow local areas to capture new opportunities quickly. An ample supply of available sites for development is needed and thus a favourable proactive planning system that allows companies and fund managers to invest in these sites, preventing the loss of future investment in the Borough.</p> <p>Promoting quality of life: Already highlighted above as one of the Midlands Engine's strategic objectives, the quality of life agenda is critical to the success of Stafford. To</p>	
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		<p>grow the economy, the Local Plan Review needs to provide attractive communities, homes and leisure facilities close to investment and new industry/employment. This presents the ideal opportunity to encourage a greater number of development sites for housing and employment in the Borough.</p> <p>More detailed analysis of future trends is clearly required as part of the Local Plan Review, however the analysis above suggests that well over 14,000 jobs could be created in Stafford over the next 20-25 years, pushing annual jobs growth close to 1.0% and potentially higher. For this to happen, the Plan needs to not only allocate enough employment land in the right places, but it also needs to plan for the right level of housing to support future growth and develop communities where the future population and workforce want to live.</p> <p>SA2: The UK Industrial Strategy should be considered through the Sustainability Appraisal process.</p> <p>SA3: Job numbers need to be included as one of the indicators for the economic baseline data outlined in the Sustainability Appraisal. Given the trend of declining employment discussed in response to question SA1, it is imperative that employment in Stafford is closely monitored. Data are freely available for this purpose on an annual basis via the Business Register & Employment, published by the Office for National Statistics.</p> <p>SA4: The Sustainability Appraisal rightly highlights growth in advanced manufacturing as an issue and opportunity, however other industries should be considered in the development of the plan. The opportunities created by HS2 won't be confined to a single sector, for example. Analysis of the entire Stafford economy is required to gain a full picture of where growth in the Borough is likely to come in the long-term. The LEP's Strategic Economic Plan already provides a starting point for this, which identifies two "barometer" sectors that should be supported in the long-term, both of which are likely to have significant land requirements to support their growth:</p> <ul style="list-style-type: none"> • Tourism & leisure • Business & professional services 	<p>Update PPP table within the Technical Appendices.</p> <p>Levels of employment addressed through other indicators (see table in Chapter 4).</p>
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				<p>analyse it are not considered to form part of the baseline at this stage.</p> <p>Clarity to be provided in terms of defining 'higher value companies'</p> <p>As above - levels of employment addressed through other indicators (see table in Chapter 4).</p> <p>As above - update baseline to include previous housing delivery rate per annum (see AMR?)</p> <p>Update PPP table within the Technical Appendices.</p>
012	Stowe by Chartley Parish Council	SA3	An indicator of GP service provision should be included.	Include within baseline
013	Hopton Parish Council	General	No Comment	N/A

Revised SA Framework

Table 7.1 within the Stafford Borough SA Scoping Report is titled “Sustainability Objectives, Indicators and Targets”, which proposes a Framework of objectives to address the key sustainability issues and opportunities identified through the baseline information and plans and programmes review. Following a review of this Framework, and in light of the representations received on the Scoping Report (see Table 1.1 above), we propose a number of SA Themes in Table 1.2 below, in order to help organise/ consolidate some of the Objectives and allow for a more proportionate and accessible appraisal of the Local Plan through the SA process. Furthermore, a number of additions/deletions have been recommended, focussing on the SA Objectives themselves rather than the targets/ indicators set out in Table 7.1.

Where Objectives have been amended, if new, text is red and underlined, if deleted, is ~~struck through~~.

Theme	SA Objectives	Comment
Air quality	<ul style="list-style-type: none"> Take action to reverse the trend for increasing emissions by supporting and enabling the use of low emission technologies and actively encouraging sustainable modes of transport such as walking and cycling, particularly where it is possible to leverage the opportunities presented by new development. Locate and design development so that current and future residents will not regularly be exposed to poor air quality; notably the M6 motorway around Stafford and Clayton. 	Objectives included to reflect the importance of the need to address air quality across the Borough (ensuring no Air Quality Management Areas are required). This also reflects Highways England scoping rep.
Biodiversity	<ul style="list-style-type: none"> To protect and enhance biodiversity Minimise, and avoid where possible, impacts to biodiversity, both within and beyond designated and non-designated sites of national and local significance. Achieve biodiversity net gain including through the long term enhancement and creation of well-connected, functional habitats that are resilient to the effects of climate change. 	Objective vague. Updated to reflect NE best practice. I.e. NE will expect to see key terminology such as ‘minimise’, and ‘avoid’ in terms of impacts on biodiversity, and reference to net-gain.
Climate change adaptation	<ul style="list-style-type: none"> To reduce vulnerability to the effects of climate change such as risk flooding, on public well-being, the economy and the environment. Adapt to current and future flood risk by directing development away from the areas of the Borough at the highest risk of flooding from all sources. Provide sustainable management of current and future flood risk through sensitive and innovative planning, development layout and construction. 	Objective revised to be more specific in terms of flood risk sources and inclusion of flood risk management requirements in accordance with the NPPF (2019).
Climate change mitigation	<ul style="list-style-type: none"> To reduce societal contributions to climate change Continue to drive down CO₂ emissions from all sources by achieving high standards of energy efficiency in new development, by providing attractive opportunities to travel by sustainable means and by protecting land suitable for renewable and low carbon energy generation, including community schemes. 	Objective vague. Revised to further detail societal contributions to climate change and mitigation opportunities

Economy and employment	<ul style="list-style-type: none"> • <u>Ensure that education and skills provision meet the needs of the Borough's existing and future labour market and improve life chances for all.</u> • To create high, stable and equitable levels of employment and competitiveness that recognises social and environmental issues, <u>enhancing the vitality of the Borough's town and villages.</u> • Support the needs of the local rural economy. • <u>To ensure that sufficient supporting/enabling infrastructure of the right type is available in the right places and at the right time to support growth and innovation.</u> • <u>Increase the availability of high speed broadband especially in the villages and isolated properties and all new build properties.</u> 	<p>Objectives expanded upon. Additional objectives included in response to scoping reps and key actions/ issues for the Plan</p>
Health and wellbeing	<ul style="list-style-type: none"> • Improve opportunities for access for all to work, education, health and local services • To improve health, safety and well-being across the whole community • <u>Improve the physical and mental health and wellbeing of Stafford residents, including through enhancing existing health, sports, and leisure facilities and reducing health inequalities between local communities across the Borough.</u> • To reduce the impact of noise and light pollution; <u>including potential traffic noise pollution.</u> 	<p>Objective split between the health and population SA theme Objective rephrased, 'safety' moved to the population and community SA theme.</p>
Historic environment	<ul style="list-style-type: none"> • Protect, conserve and enhance heritage assets, including their setting and significance, and contribute to the maintenance and enhancement of historic character through design, layout and setting of new development. 	<p>Direct reference to potential traffic noise pollution included in response to Highways England scoping rep.</p> <p>HE scoping rep highlight that having an objective that refers to both landscape and historic environment will be difficult to assess what the impact to heritage is as the SA may score a positive for landscape but not for heritage. Objective therefore split between landscape and heritage.</p> <p>HE recommended that specific reference be made to <i>“protecting and enhancing the significance of heritage assets”</i>.</p>

<p>Housing</p>	<ul style="list-style-type: none"> • To ensure that everyone has the opportunity of a decent and affordable home • <u>Support timely delivery of an appropriate mix of housing types and tenures, including a focus on maximising the potential from strategic brownfield opportunities, to ensure delivery of high quality, affordable and specialist housing that meets the needs of Stafford’s residents, including older people.</u> 	<p>Objective revised to refer more specifically to the mix of housing types and tenures, and include reference to the elderly given this is a significant proportion of the Borough’s population. Reference to maximising brownfield use reflects scoping reps.</p>
<p>Land, soils and waste</p>	<ul style="list-style-type: none"> • To protect and conserve soil • <u>Promote the efficient and sustainable use of land and natural resources, including supporting development which makes effective use of previously developed land and avoids the best and most versatile agricultural land where applicable.</u> • <u>Support the County objectives for the sustainable management of minerals and waste.</u> 	<p>Objective revised to be more inclusive in terms of land and natural resources, and promote the use of PDL – reflecting scoping reps.</p>
<p>Landscape</p>	<ul style="list-style-type: none"> • To protect, enhance and, where necessary, restore the Borough’s designated landscape areas and town character, scenic beauty and local distinctiveness, and historic and cultural character <u>through appropriate design and layout of new development, including the preservation of the Cannock Chase AONB and key views.</u> 	<p>HE scoping rep highlight that having an objective that refers to both landscape and historic environment will be difficult to assess what the impact to heritage is as the SA may score a positive for landscape but not for heritage. Objective therefore split between landscape and heritage. Specific reference to the AONB included given its national importance.</p>
<p>Population and communities</p>	<ul style="list-style-type: none"> • <u>Sustain and enhance the vitality and viability of Stafford Borough’s towns and villages, and their communities through supporting good access to existing and planned services, facilities and community infrastructure, including green infrastructure, for new and existing residents, mindful of the potential for community needs to change over time.</u> • <u>Locate development in areas that can support accessibility improvements, reducing deprivation within communities across the Borough.</u> • To create a sense of community identity and belonging 	<p>Objective moved from social, health, and wellbeing (discussed above), and expanded to reflect key services, facilities and infrastructure needs. Objective seeking to improve accessibility and reduce deprivation</p>

	<ul style="list-style-type: none"> ● To ensure tolerance, respect and engagement with people from different 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 ● To encourage a strong, inclusive, community and voluntary sector ● To engender a sense of civic and neighbourhood values, responsibility and pride ● Improve safety within communities throughout the Borough; reducing and preventing crime and reducing the fear of crime ● Create a sense of community identity, belonging and pride; encouraging community engagement in local issues, and a strong voluntary sector. ● Ensure tolerance, respect and engagement with people from different cultures, backgrounds and beliefs recognising their rights and responsibilities. 	<p>levels – reflects key action/issue for the Plan</p> <p>Objectives combined and condensed.</p>
<p>Transport</p>	<ul style="list-style-type: none"> ● Ensure that the provision of infrastructure is managed and delivered to meet local population and demographic change whilst helping to reduce congestion and travel times. This includes providing infrastructure that maximises accessibility for all and connects new housing developments to employment, education, health and local services, including public realm. 	<p>Specific transport objective included to reflect Highways England scoping rep, and tease out sustainable transport targets identified within previous ‘population’ and ‘health’ objectives.</p>
<p>Water resources and water quality</p>	<ul style="list-style-type: none"> ● To protect and enhance water quality of the Borough's rivers whilst maximising their carrying capacity and achieving sustainable water resource management ● Promote sustainable forms of development which minimises pressure on water resources, water consumption and wastewater flows, including the use of innovative features and techniques where possible, to maintain and enhance water quality of the Borough’s rivers and aquifers; consistent with the aims of the Water Framework Directive. 	<p>Objective updated to reflect EA scoping rep.</p>

