

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

Interim SA Report  
Non-Technical Summary

October 2022

**Quality information**

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# Introduction

AECOM is commissioned to lead the Sustainability Appraisal (SA) process in support of the emerging Stafford Borough Local Plan 2020-2040. Once adopted, the local plan will set the strategy for growth and change for the borough up 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 effects of an emerging plan, and alternatives, with a view to minimising adverse effects and maximising the positives.

Central to the SA process is preparation of an SA Report for publication alongside the Draft Plan. At the current time, an early draft ('preferred option') version of the local plan is published for consultation, and an Interim SA Report published alongside.

This report is the Non-Technical Summary (NTS) of the Interim SA Report.

## Structure of the Interim SA Report / this NTS

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 alternatives'.

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

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

3) What happens **next**?

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

## What's the scope of the SA?

The scope of the SA is reflected in a list of topics and objectives. Taken together, this list indicates the parameters of SA, providing a methodological 'framework' for assessment.

The topics at the core of the SA framework are as follows:

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

# Plan-making / SA up to this point

An important element of the required SA process involves assessing ‘reasonable alternatives’ in time to inform the draft plan, and then publishing information on reasonable alternatives for consultation alongside the draft plan.

As such, Part 1 of the main report explains work undertaken to develop and appraise a ‘reasonable’ range of alternative approaches to the allocation of land for development, or **growth scenarios**.

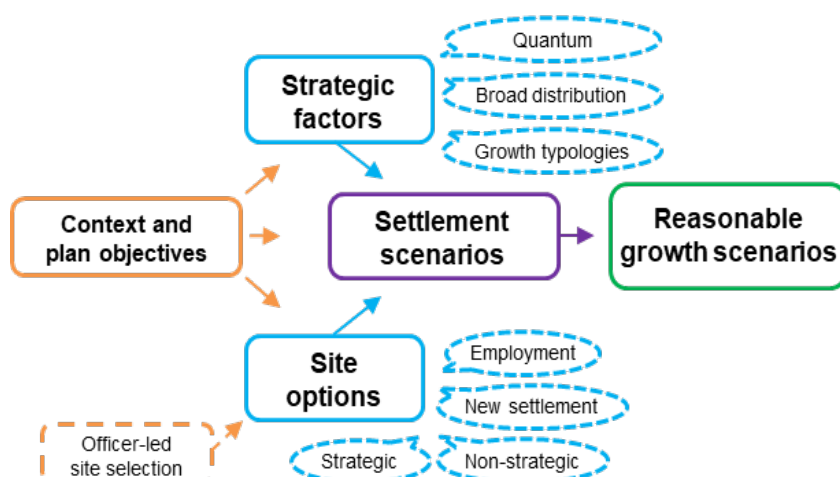
Specifically, Part 1 of the report –

- 1) Explains the process of **establishing** the growth scenarios
- 2) Presents the outcomes of **appraising** the growth scenarios
- 3) Explains reasons for **establishing** the preferred option, in light of the assessment

## Establishing growth scenarios

Growth scenarios were established following a step-wise process, which is summarised in Figure A.

*Figure A: Establishing growth scenarios*



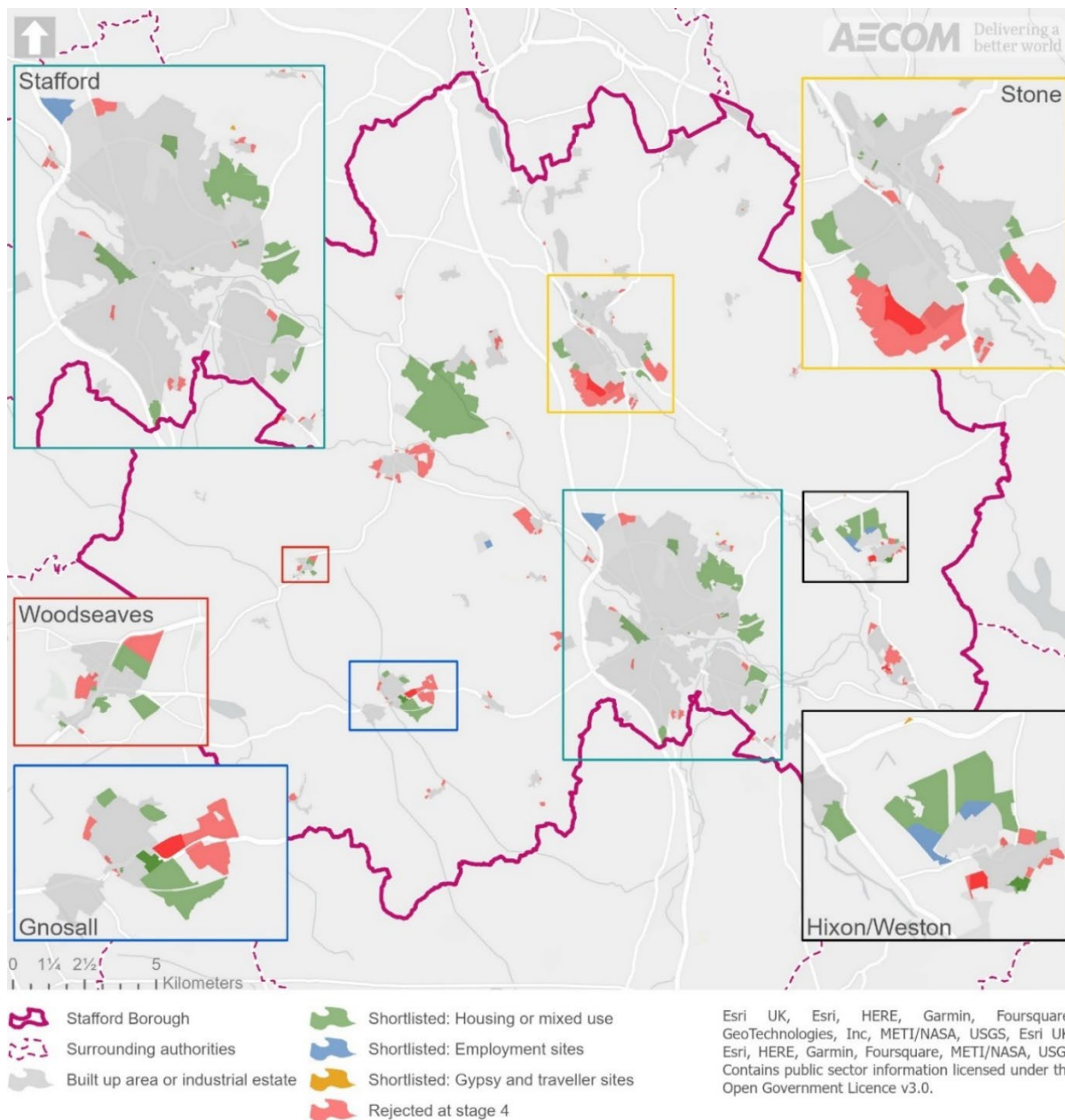
The **first step** was to give ‘top down’ consideration to strategic factors, for example:

- Development quantum – key evidence includes the Economic and Housing Development Needs Assessment (EHDNA, 2020) and the consultation response received from Councils within the sub-region in terms of Duty to Co-operate strategic issues, including unmet housing needs.
- Broad distribution – there are a range of strategic considerations, including in respect of:
  - Recognising the benefits of strategic growth locations, but also the importance of ensuring a mix of site types and sizes, and a good geographical spread of growth across the borough.
  - Transport connectivity between growth locations and key destinations, including the constrained urban areas from which unmet needs are arising, or might arise.
  - Variation in community infrastructure capacity across the borough, particularly schools capacity.
  - Directing growth away from areas subject to environmental constraint (in the widest sense, including historic environment) and realising opportunities, e.g. green / blue infrastructure.
  - The links between spatial strategy / site selection and realising opportunities to minimise per capita greenhouse gas emissions from both transport and the built environment.
  - Other issues / opportunities / options explored prior to, during and subsequent to the Issues and Options Station (2020), including for strategic growth options (including [Stafford Station Gateway](#) and [Meecebrook](#)). See: [www.staffordbc.gov.uk/new-lp-2020-2040-evidence-base](http://www.staffordbc.gov.uk/new-lp-2020-2040-evidence-base)

The **second step** was then 'bottom up' consideration of the pool of site options available and hence in contention for allocation. The starting point was a list of 57 site options that passed through a four stage site selection process led by Stafford Borough Council (SBC) officers. These 'shortlisted' sites are shown in the figure below, along with sites that were rejected at the final stage of the SBC-led process.

The specific work led by AECOM at this stage in the process involved: A) a comparative appraisal of the four key strategic site options (see Appendix IV of the main report);<sup>1</sup> and B) quantitative (GIS) analysis of all site options (see Appendix V of the main report).

*Figure B: The 57 shortlisted site options, plus sites rejected at Stage 4 of the SBC process*



The **third step** involved exploring settlement-specific growth scenarios – see Table A. This involved giving consideration to the 57 shortlisted site options on a settlement-by-settlement basis and reaching a decision on how they might reasonably be allocated in combination, mindful not only of site-specific factors, but also settlement-specific and borough-wide strategic factors, including housing needs.

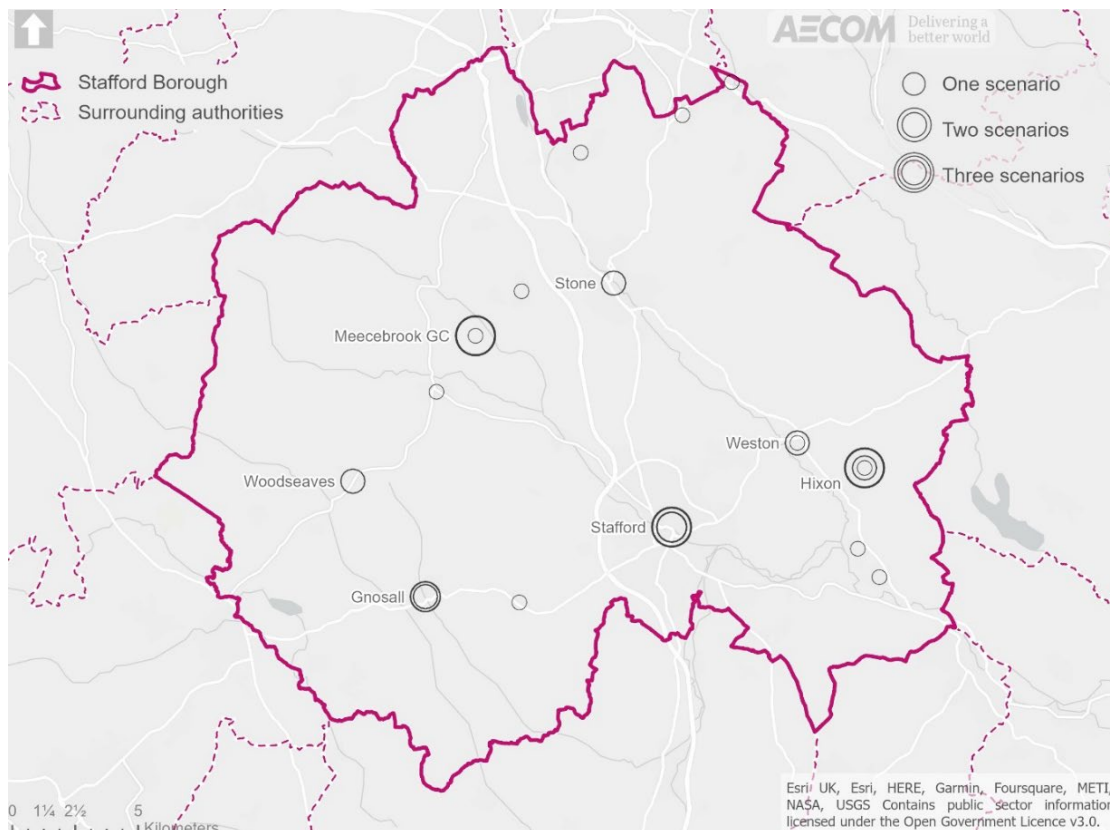
<sup>1</sup> The four strategic site options appraised within Appendix IV are: 1) Meecebrook; 2) Hixon Airfield; 3) Beacon Hill, Stafford; and 4) Gnosall South. Stafford Station Gateway is another strategic site option, but is a different proposition, as a largely brownfield regeneration site. It is also important to note that two of these sites (Meecebrook and Hixon Airfield) were previously appraised and consulted upon in 2019 / 2020, plus an amended version of Gnosall South was explored at that stage. In contrast, Beacon Hill (located to the east of Stafford), is a new strategic site option to emerge since 2020. The other four strategic development site options from 2019 / 2020 are now ruled out as not reasonably in contention for allocation.

For ten settlements the conclusion was that there is only one reasonable growth scenario, i.e. there is *not* a strategic choice between alternative growth scenarios that reasonably needs to be taken forward. For four settlements the conclusion was that there are two reasonable growth scenarios, and for one settlement (Hixon) the conclusion is that there are three reasonable growth scenarios.

**Table A: Summary of settlement-specific growth scenarios**

Settlement		Settlement scenarios
Towns	Stafford	<b>Two scenarios:</b> 1,181 or 3,181 homes
	Stone	One scenario: 370 homes
Meecebrook GC		<b>Two scenarios:</b> 0 or 3,000 homes
Larger villages	Barlaston	One scenario: 0 homes
	Blythe Bridge	One scenario: 0 homes
	Eccleshall	One scenario: 0 homes
	Gnosall	<b>Two scenarios:</b> 109 or 463 homes
	Great Haywood	One scenario: 0 homes
	Haughton	One scenario: 0 homes
	Hixon	<b>Three scenarios:</b> 0, 128 or 1,985 homes
	Little Haywood and Colwich	One scenario: 0 homes
	Meir Heath / Rough Close	One scenario: 0 homes
	Weston	<b>Two scenarios:</b> 0 or 175 homes
	Woodseaves	One scenario: 125 homes
Yarnfield	One scenario: 0 homes	
Tier 5 settlements		One scenario: 0 homes
<b>Minimum total homes from allocations</b>		<b>1,785 homes</b>
<b>Theoretical max total homes from allocations</b>		<b>9,299 homes</b>

**Figure C: Further summary of the settlement scenarios**



The **final step** involved considering reasonable ways of combining the settlement-specific scenario in order to form borough-wide growth scenarios. A starting point was an understanding that:

- 435 dwellings per annum (dpa), or 8,700 homes over the 20 year plan period, is a reasonable low growth scenario, but there is also a need to consider higher growth scenarios;
- There is also a need for a 'supply buffer', e.g. 15%, such that there is a need to identify a total housing supply of approximately, as a minimum, 10,000 homes;
- 7,045 homes have already been completed, since the start of the plan period, or are 'committed', in that they have planning permission or an existing local plan allocation that can be rolled forward;
- Also, 800 homes can be anticipated from windfall sites over the plan period, that is sites that come forward – typically within settlement boundaries – without a local plan allocation;
- Hence, as a *minimum*, new allocations must provide for  $10,000 - 7,045 - 800 = \sim 2,150$  homes.

There are many feasible combinations of sub-area scenarios that could feasibly deliver this number of homes, or a higher figure, hence there was a need to make some pragmatic judgements regarding which combinations should be taken forward for appraisal as the reasonable growth scenarios. Ultimately **eleven reasonable alternative growth scenarios** were established. These reflect eight alternative approaches to housing growth, plus two alternative approaches to employment growth (specifically, under higher housing growth scenarios, there is the question of whether to allocate a 31 ha extension to Redhill Business Park, which is located on the A34 at the northern edge of Stafford).

The growth scenarios are presented below. The following are final points to note:

- 18 allocations (e.g. Stafford Station Gateway) are assumed as a 'constant' across all scenarios.
- Meecebrook might deliver ~3,000 homes in the plan period and ~6,000 in total.
- Higher growth at Gnosall would involve an additional 354 home allocation to the south.
- Higher growth at Hixon would involve either A) two smaller sites; or B) Hixon Airfield.
- Higher growth at Weston would involve a site to the south for ~175 homes.
- Setting the housing requirement at 435 dpa is considered a reasonable low growth scenario, albeit recognising that local housing need, according to the Government's standard method, is 391 dpa.
- Another clear option is to set the housing requirement at 535 dpa, calculated as 435 dpa plus 100 dpa (2,000 homes in total) unmet need from one or both of the constrained neighbouring urban conurbations (Birmingham and the Black Country to the south, and Stoke-on-Trent to the north).

**Table B: The reasonable growth scenarios – summary**

Scenario	Completions, commitments, windfall, constant allocations <u>plus growth or higher growth at...</u>	Total homes	Homes per annum	New employment allocations
1	Gnosall, Hixon and Weston	10,287	514	5
2	Hixon Airfield	11,615	581	15
3	Stafford (Beacon Hill)	11,630	581	5
4	Hixon Airfield and Gnosall	11,969	598	15
5	Beacon Hill and Gnosall	11,984	599	5
6	Meecebrook	12,630	632	20
6a	Meecebrook	12,630	632	51
7	Meecebrook and Gnosall	12,984	649	20
7a	Meecebrook and Gnosall	12,984	649	51
8	Meecebrook and Beacon Hill	14,630	732	20
8a	Meecebrook and Beacon Hill	14,630	732	51

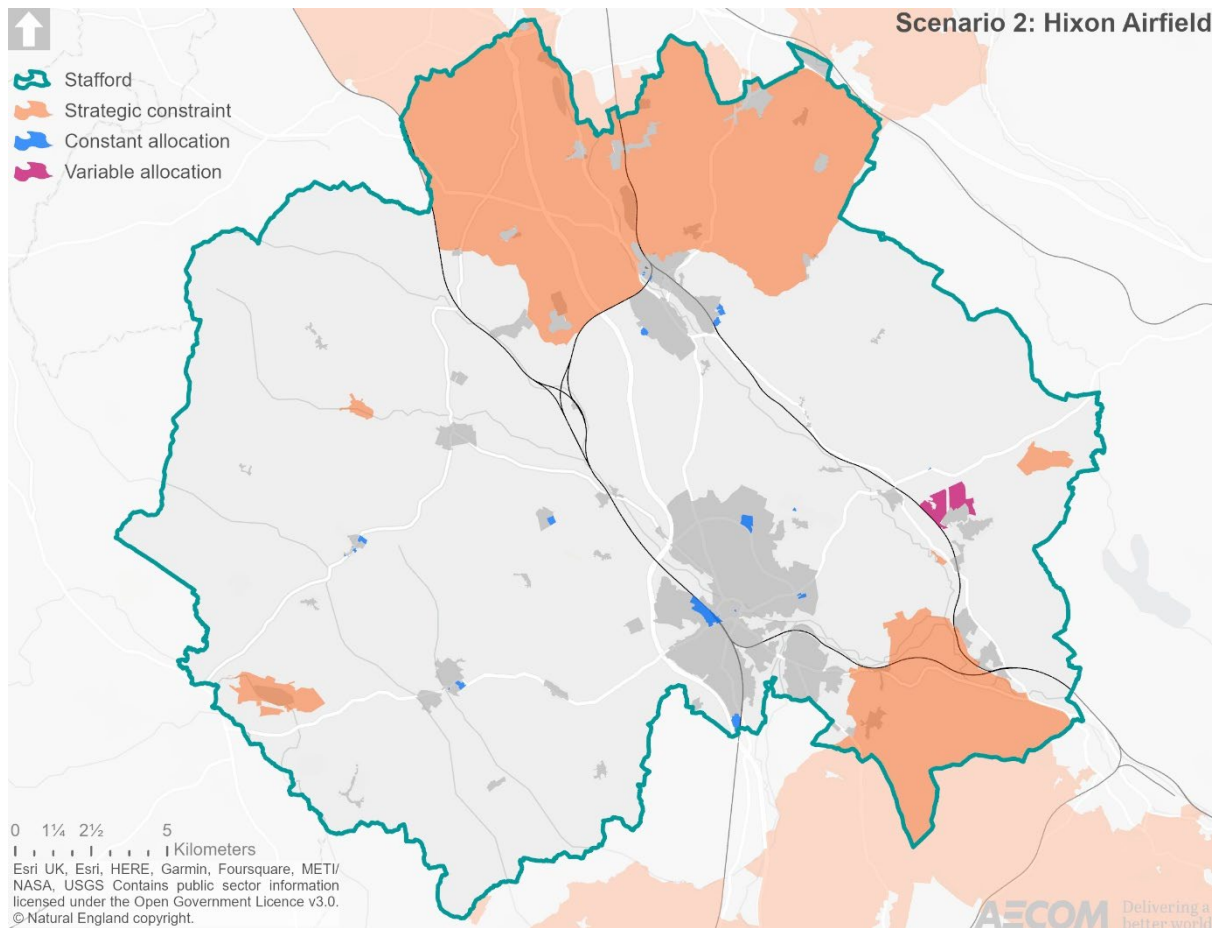
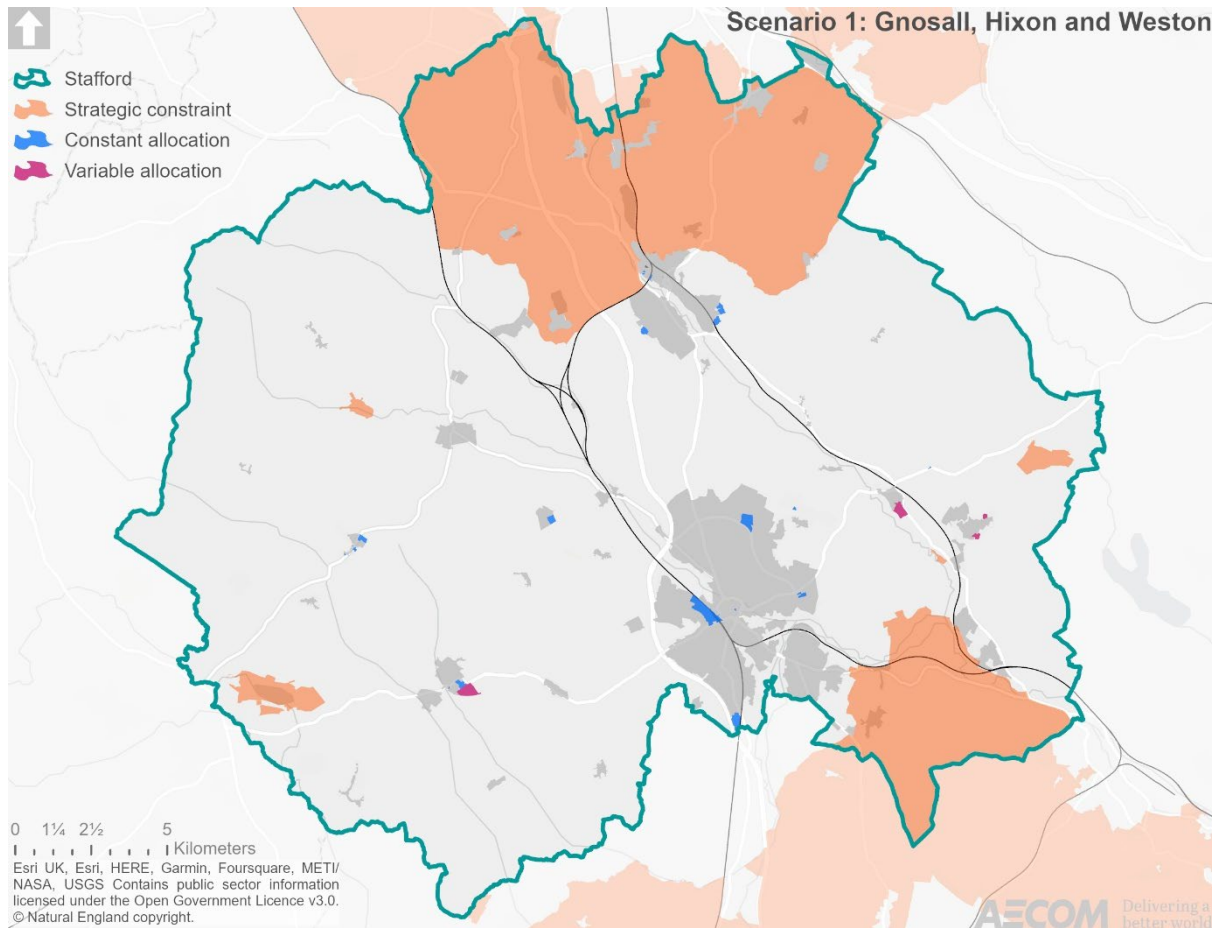
Table C: The reasonable growth scenarios (constants greyed-out; high growth highlighted with blue)

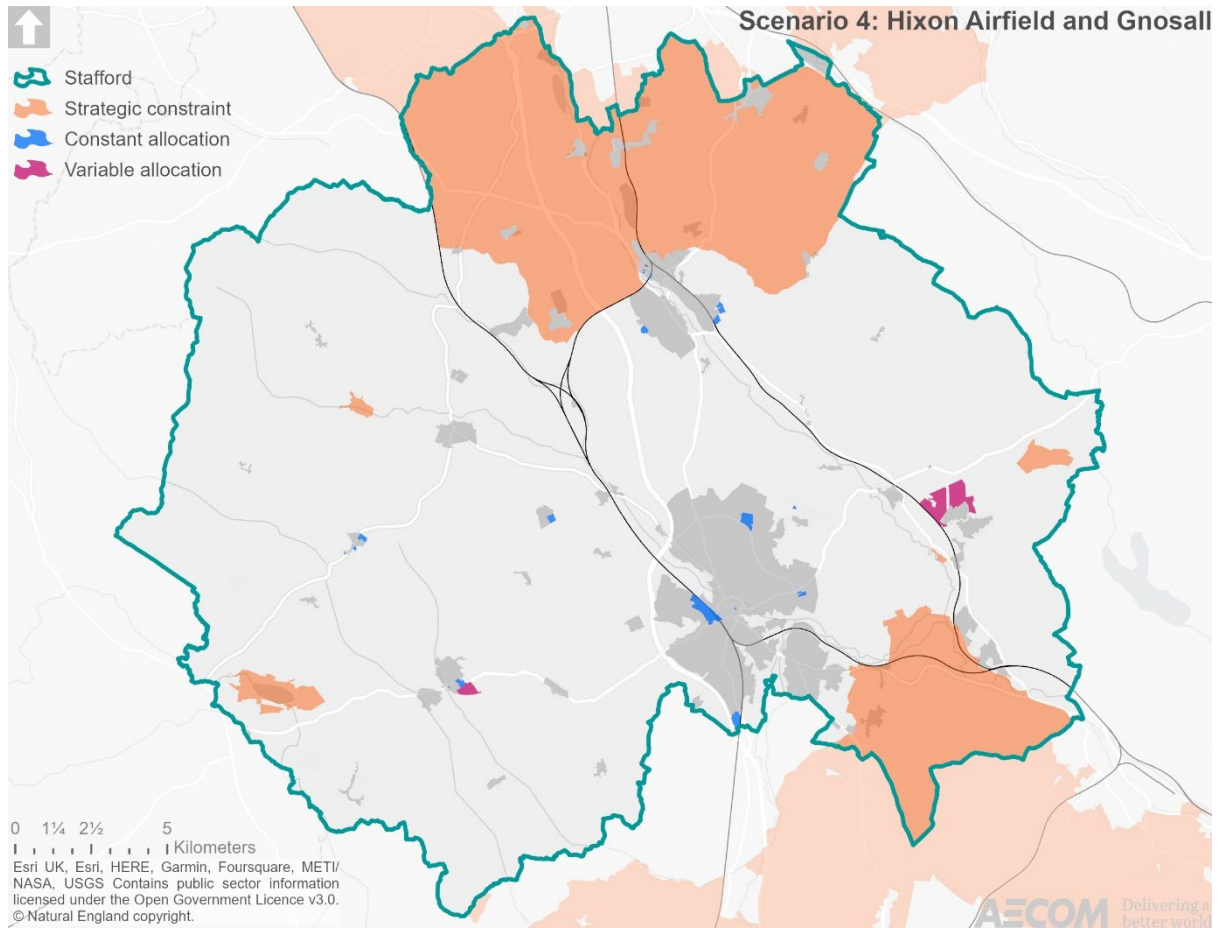
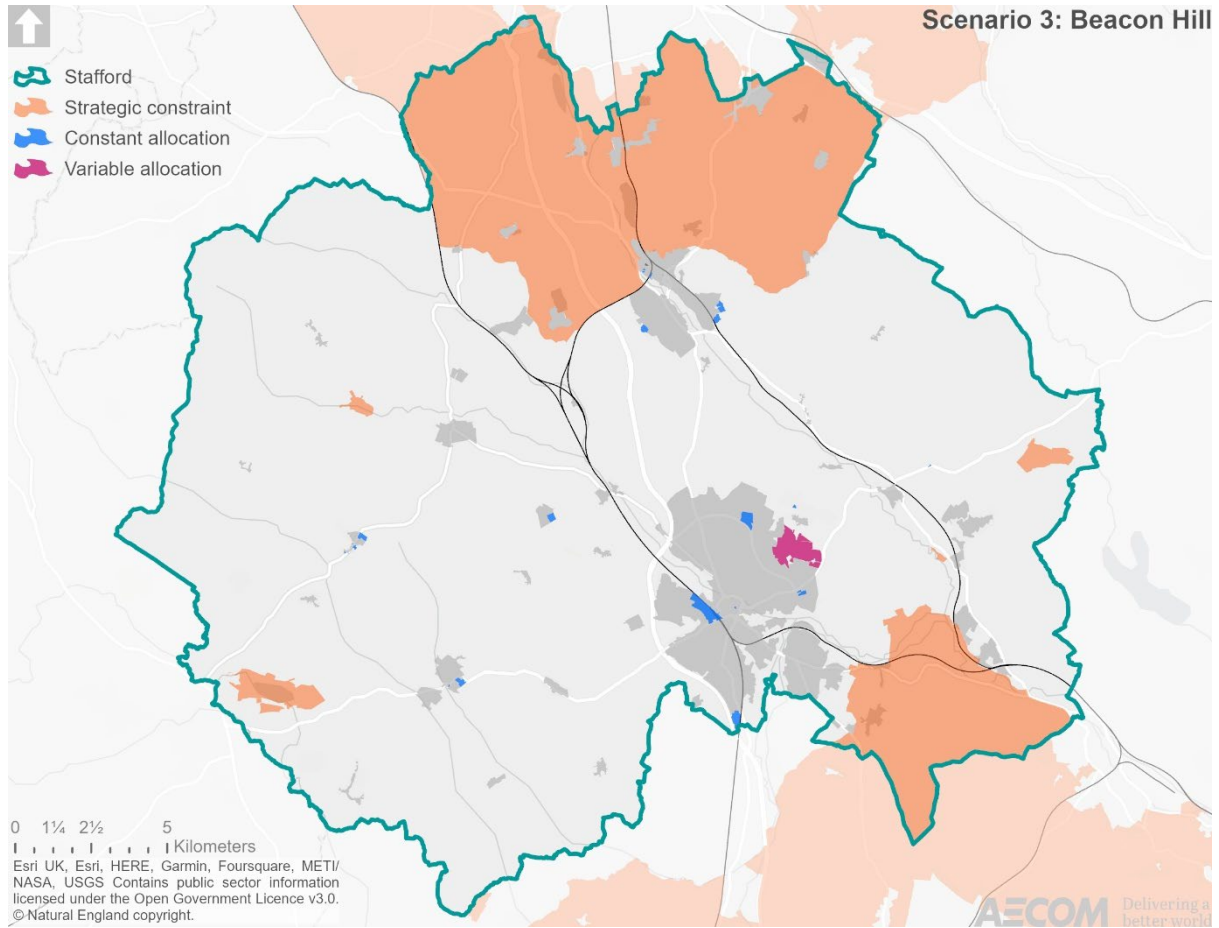
Scenario		1	2	3	4	5	6	6a	7	7a	8	8a
Completions / commitments		7,045	7,045	7,045	7,045	7,045	7,045	7,045	7,045	7,045	7,045	7,045
Windfall		800	800	800	800	800	800	800	800	800	800	800
Allocations	Stafford	1,181	3,181	1,181	3,181	1,181	1,181	1,181	1,181	1,181	3,181	3,181
	Stone	370	370	370	370	370	370	370	370	370	370	370
	Meecebrook	0	0	0	0	0	3000	3000	3000	3000	3000	3000
	Gnosall	463	109	109	463	463	109	109	463	463	109	109
	Hixon	128	0	1985	0	1985	0	0	0	0	0	0
	Weston	175	0	0	0	0	0	0	0	0	0	0
	Woodseaves	125	125	125	125	125	125	125	125	125	125	125
	Other villages	0	0	0	0	0	0	0	0	0	0	0
<b>Total new homes</b>		<b>10,287</b>	<b>11,615</b>	<b>11,630</b>	<b>11,969</b>	<b>11,984</b>	<b>12,630</b>	<b>12,630</b>	<b>12,984</b>	<b>12,984</b>	<b>14,630</b>	<b>14,630</b>
<b>Per annum (pa)</b>		<b>514</b>	<b>581</b>	<b>582</b>	<b>598</b>	<b>599</b>	<b>632</b>	<b>632</b>	<b>649</b>	<b>649</b>	<b>732</b>	<b>732</b>
<b>% above 435 pa*</b>		<b>18</b>	<b>33</b>	<b>33</b>	<b>37</b>	<b>37</b>	<b>45</b>	<b>45</b>	<b>49</b>	<b>49</b>	<b>68</b>	<b>68</b>
<b>% above 535 pa*</b>		<b>-4</b>	<b>8</b>	<b>8</b>	<b>12</b>	<b>12</b>	<b>18</b>	<b>18</b>	<b>21</b>	<b>21</b>	<b>36</b>	<b>36</b>
<b>New emp land (ha)</b>		<b>5</b>	<b>5</b>	<b>15</b>	<b>5</b>	<b>15</b>	<b>20</b>	<b>51</b>	<b>20</b>	<b>51</b>	<b>20</b>	<b>51</b>

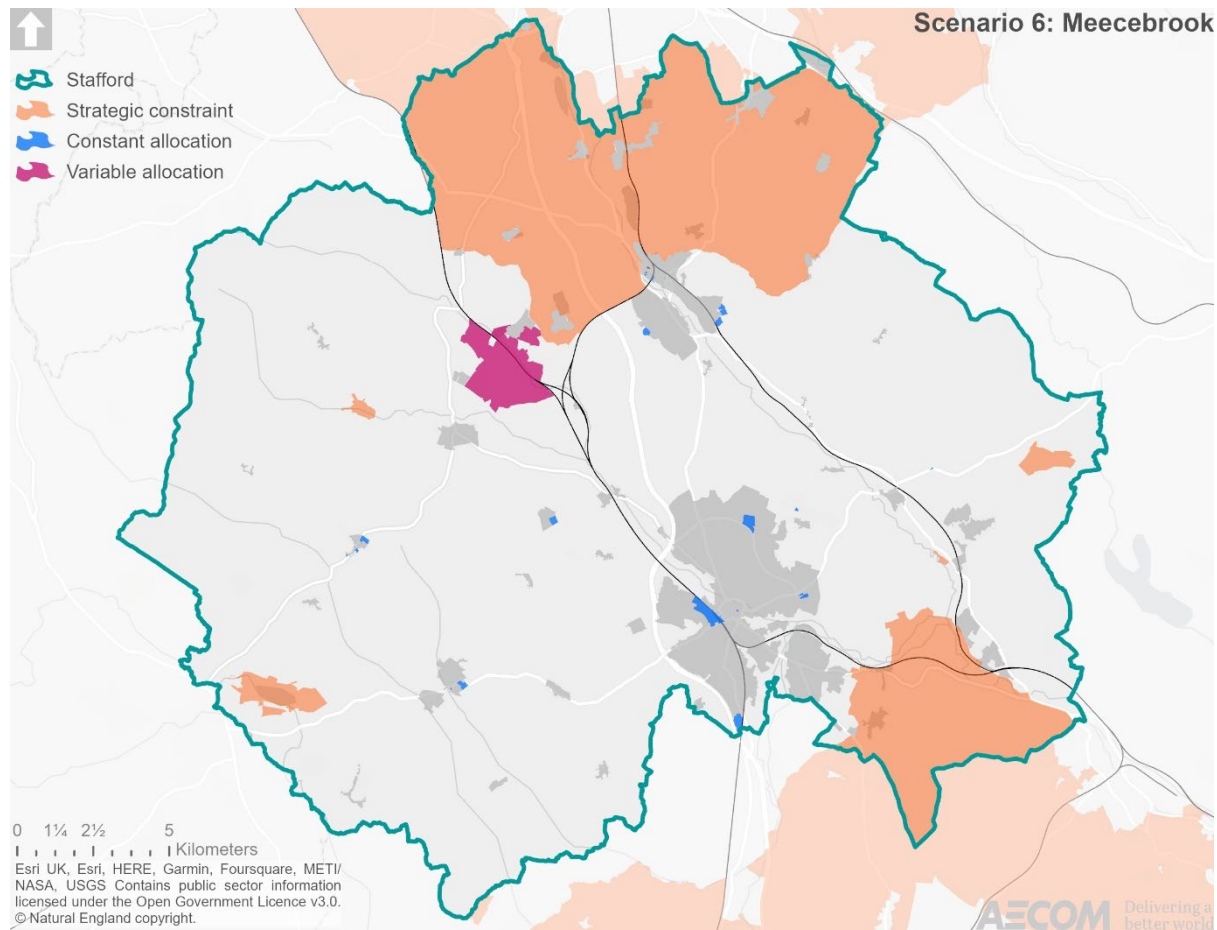
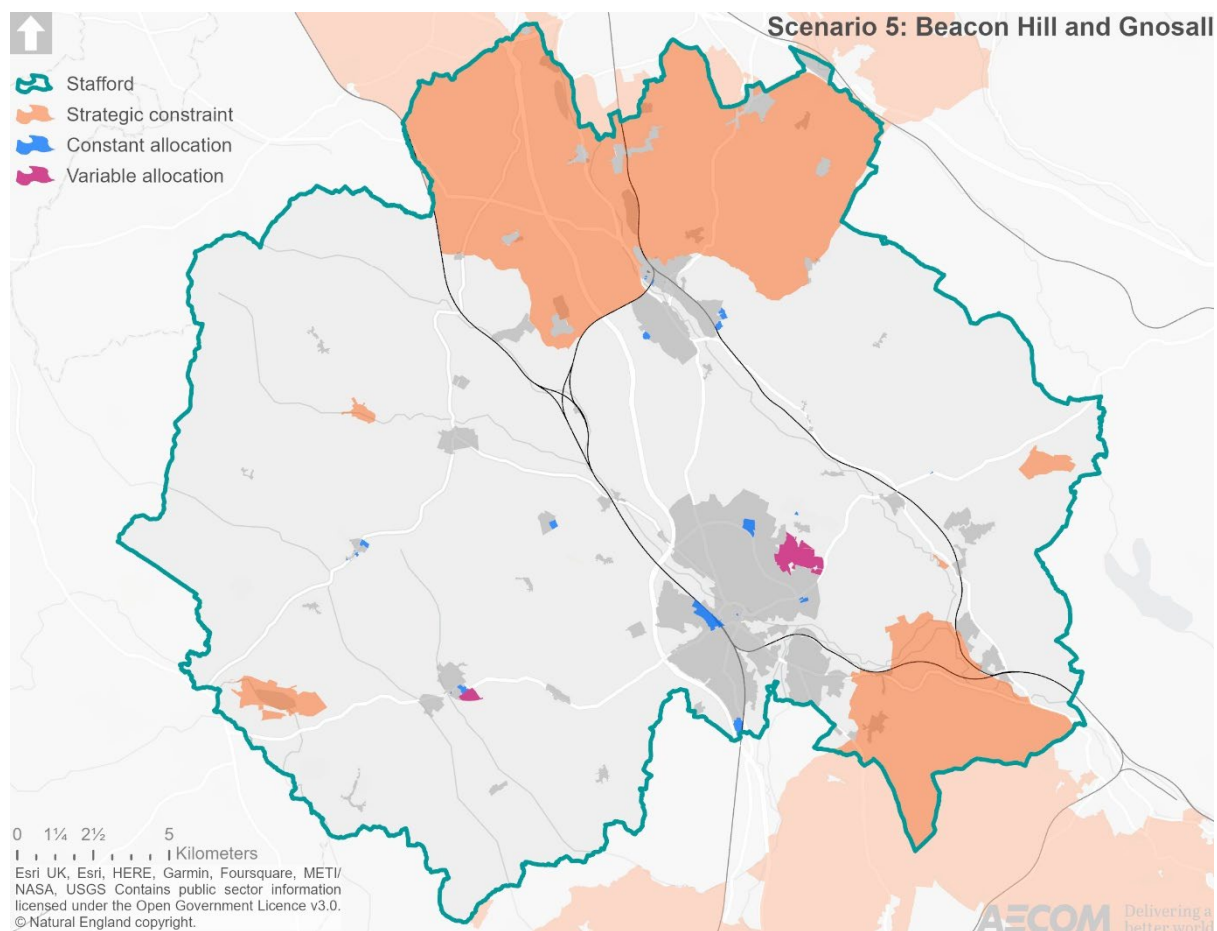
\* Explanation of shading:

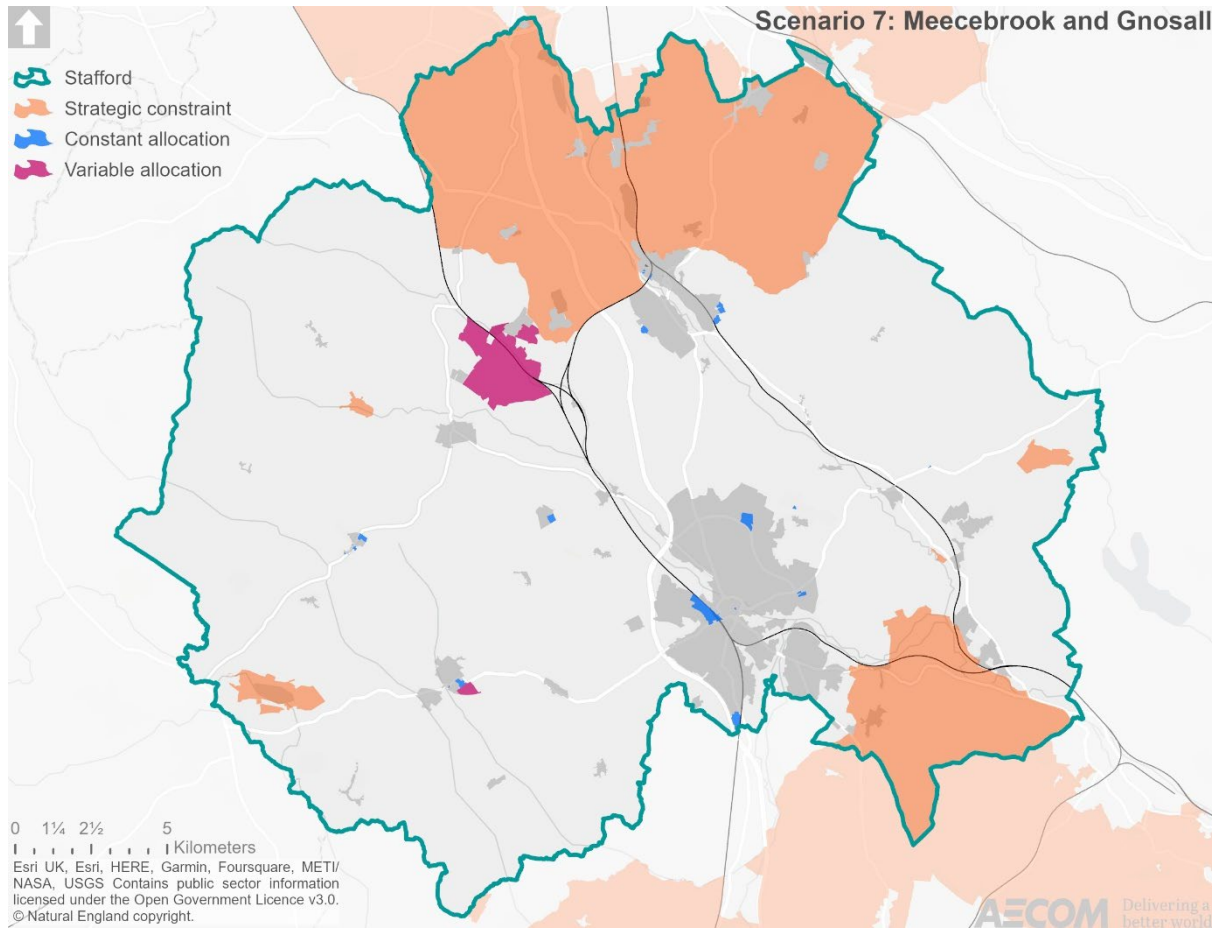
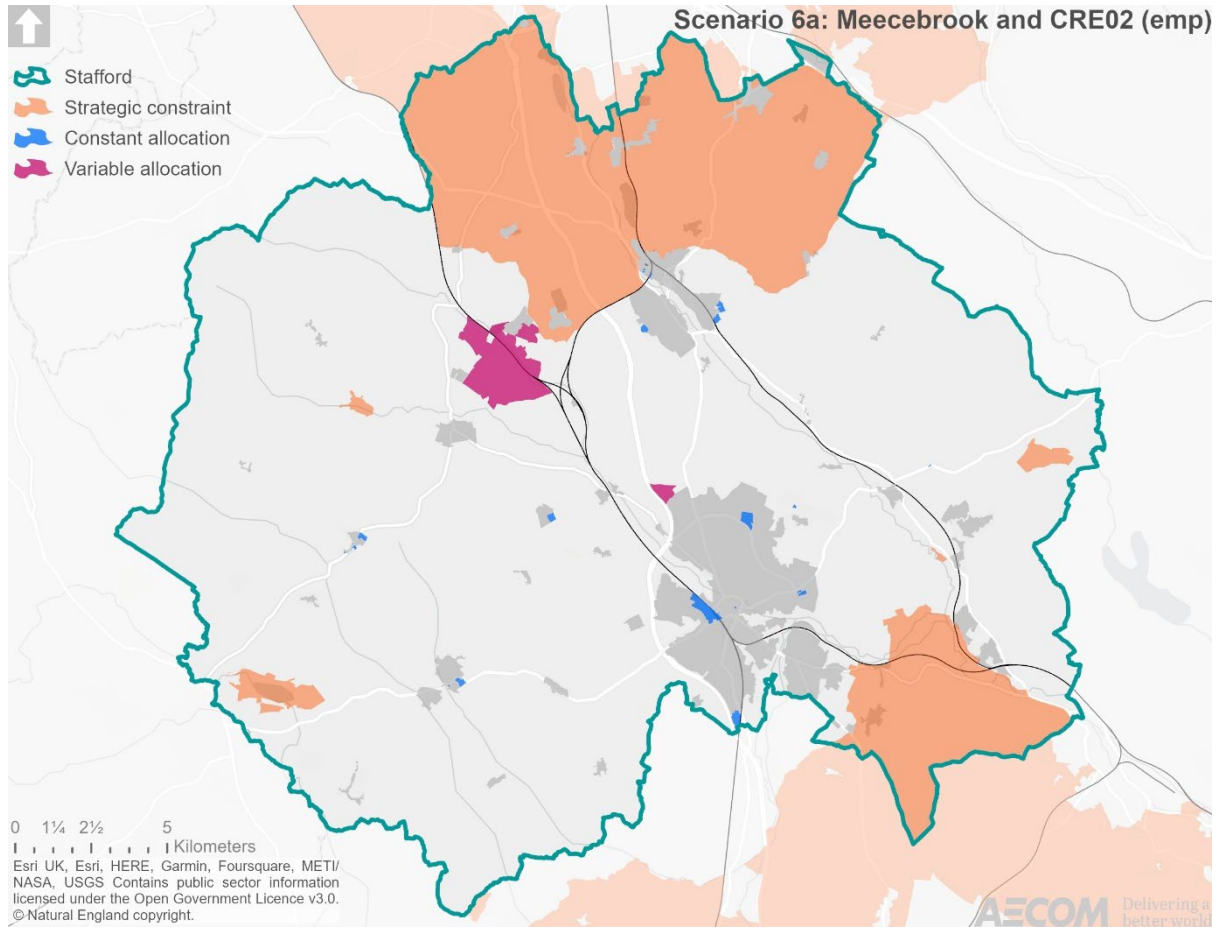
- Red – indicates a scenario with no supply buffer;
- Amber – indicates a scenario an insufficient supply;
- Light green – indicates a sufficient supply buffer;
- Dark green – indicates a supply buffer that is likely more than sufficient.

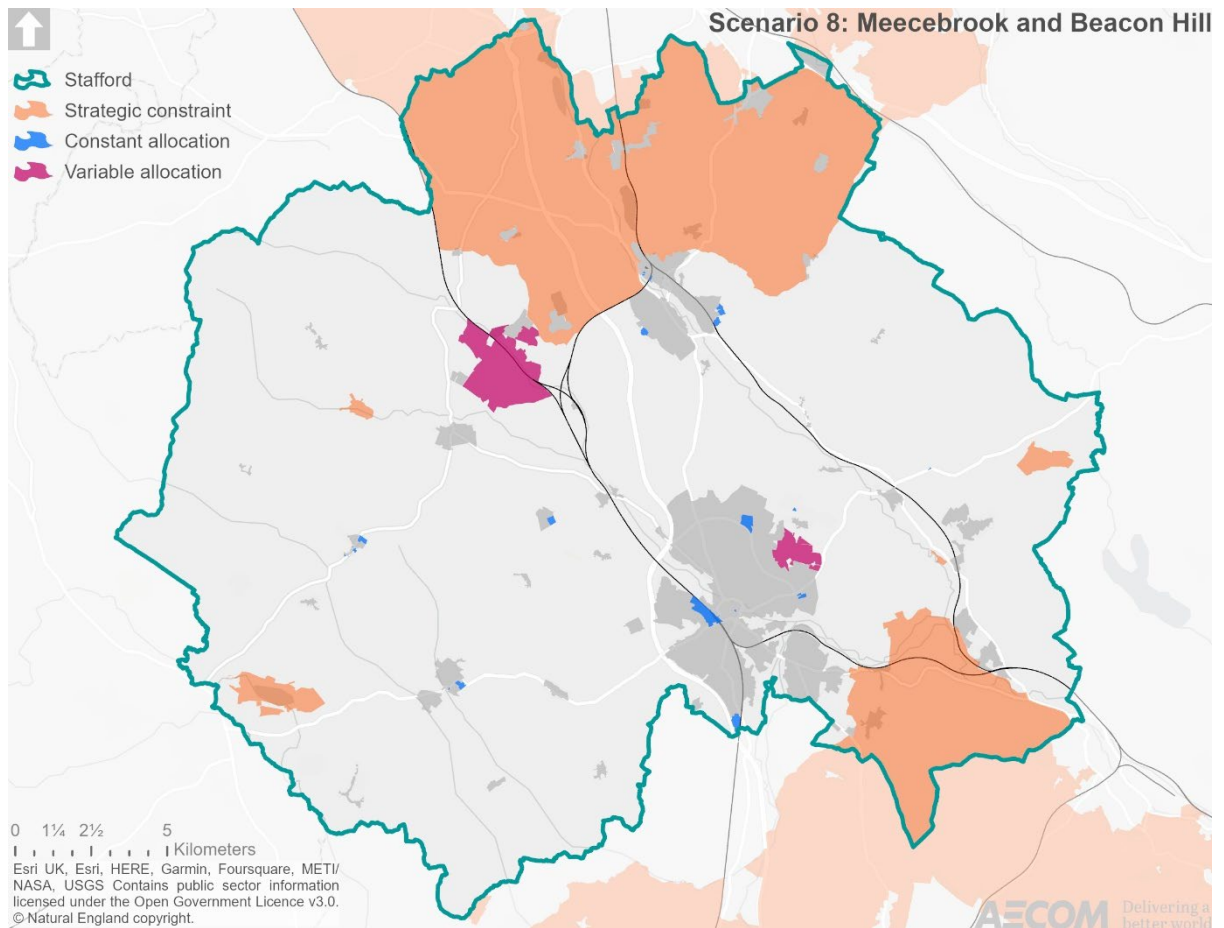
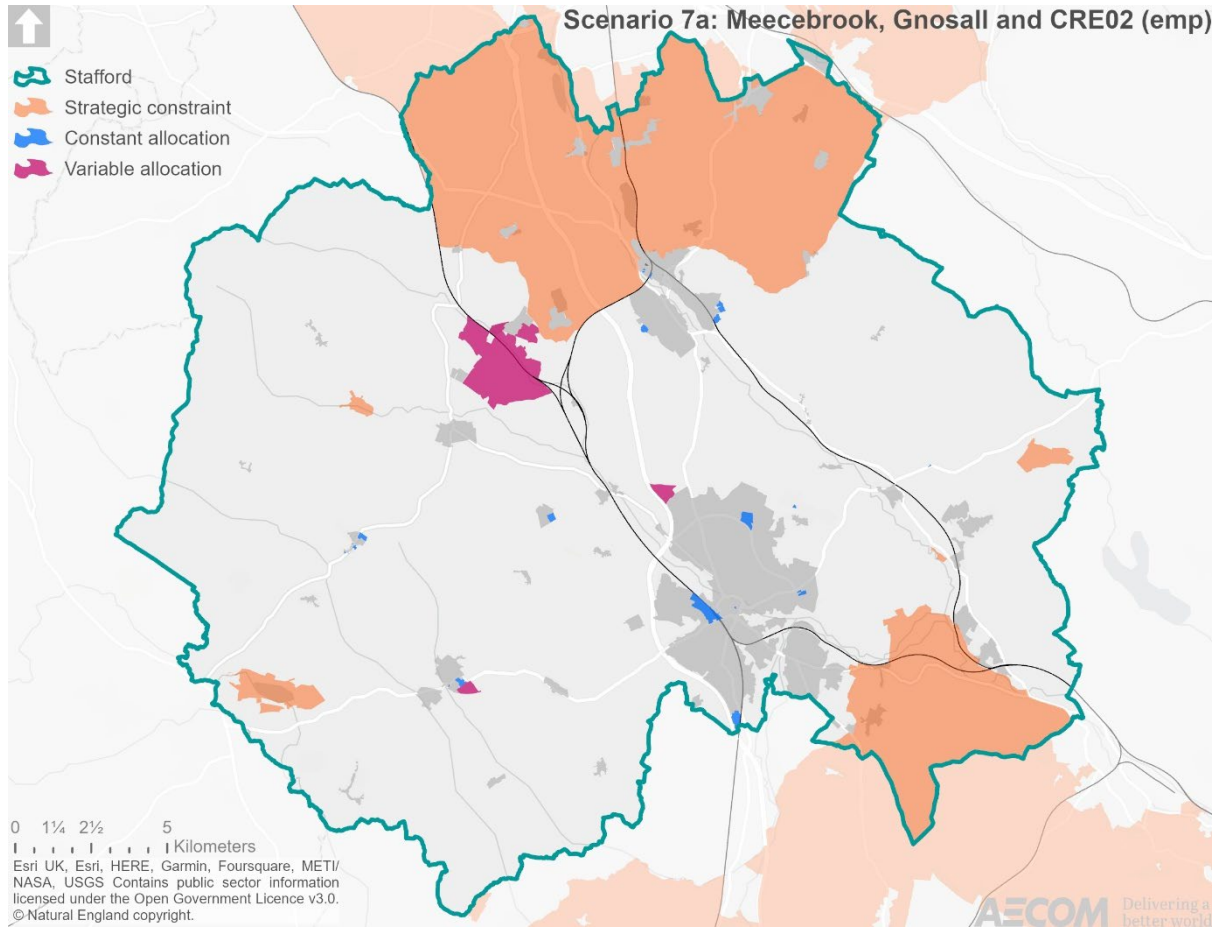


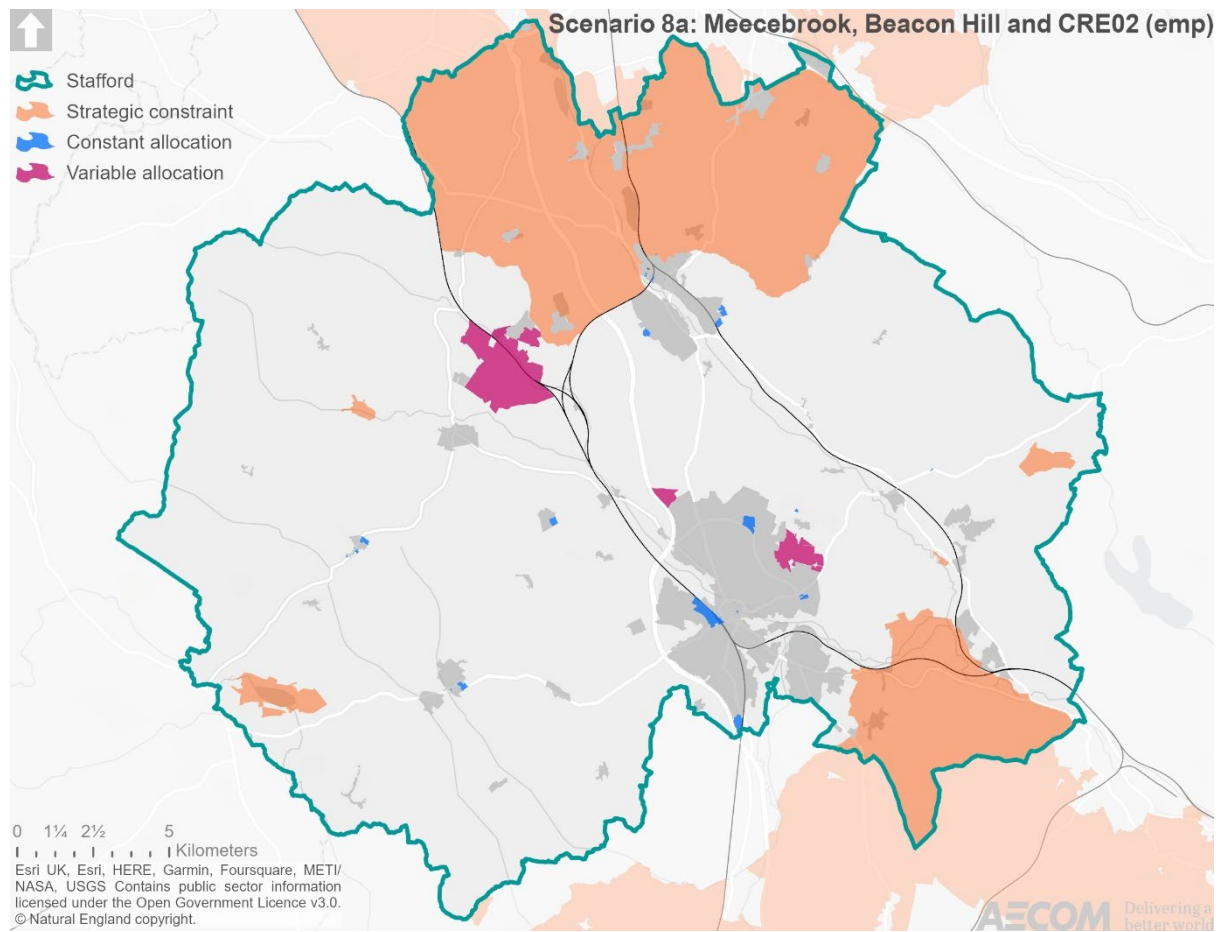












*A view of Brindley Heath, part of the Cannock Chase AONB*

### Assessing growth scenarios

Summary appraisal findings are presented within the table below. Within each row (i.e. for each of the topics that comprise the SA framework) the columns to the right hand side seek to:

- rank the scenarios by performance, where one (highlighted by a gold star) is best performing, and ‘ = ’ is used to denote where it not possible to differentiate with any confidence; and then
- categorise the performance of each scenario in terms of ‘significant effects’, using **red** (significant negative effect), **amber** (moderate or uncertain negative effect), **no colour** (no significant effect), **light green** (moderate or uncertain positive effect) and **dark green** (significant positive effect).

Table D: The reasonable growth scenarios – summary appraisal findings

Scenario <i>Constants plus growth / higher growth at...</i>	1	2	3	4	5	6	6a	7	7a	8	8a
	Gnosall, Hixon and Weston	Hixon Airfield	Beacon Hill	Hixon Airfield and Gnosall	Beacon Hill and Gnosall	Meecebrook		Meecebrook and Gnosall		Meecebrook and Beacon Hill	
Topic	Rank of preference and categorisation of effects										
Air quality	3	3	★1	3	2	★1	3	2	3	★1	2
Biodiversity	4	4	3	4	2	★1	★1	★1	★1	★1	★1
CC adaptation	=	=	=	=	=	=	=	=	=	=	=
CC mitigation	5	3	3	4	4	★1	★1	3	3	2	2
Communities	3	2	2	2	2	★1	★1	★1	★1	★1	★1
Economy	4	3	4	3	4	2	★1	2	★1	2	★1
Health / wellbeing	=	=	=	=	=	=	=	=	=	=	=
Historic environment	3	★1	★1	★1	★1	2	2	2	2	2	2
Housing	6	5	5	4	4	3	3	2	2	★1	★1
Land	2	★1	★1	2	2	2	2	2	2	2	2
Landscape	2	★1	4	★1	4	3	3	3	3	5	5
Transport	6	5	4	3	3	2	2	2	2	★1	★1
Water	=	=	=	=	=	=	=	=	=	=	=

## Discussion

A headline finding is that **higher growth scenarios** perform well, in absolute and/or relative terms, under the majority of those topics where it is possible to differentiate between the scenarios. This broadly reflects:

- support for directing growth to a large garden community at Meecebrook; and
- support for providing for unmet needs in broadly suitable locations, in the knowledge that the effect would be to reduce pressure on other locations elsewhere in the sub-region that could well be less suitable.

In contrast, **Scenario 1** is found to perform relatively poorly under all topics except 'landscape', with no positive effects predicted, as it is the lowest growth scenario and would involve a package of smaller allocations, in place of a strategic growth location, leading to opportunities missed around infrastructure and wider 'planning gain'.

The appraisal findings in respect of Scenario 1 are such that it is fair to say that it is found to perform poorly overall, potentially to the extent that it is 'unreasonable'. However, focusing on **the other ten scenarios**, it is *not* fair to say that the appraisal finds higher growth scenarios to be preferable overall.<sup>2</sup>

Having made these initial points, the following bullet points consider each of the topic headings in turn:

- **Air quality** - the order of preference reflects: relative support for Beacon Hill, as an urban extension well connected to the strategic road network, albeit MOD and employment land is a barrier to connectivity; support for Meecebrook, as part of a strategy that leads to flexibility to provide for unmet needs; and the importance of balancing housing and employment growth locally, in order to avoid problematic levels of in-commuting (N.B. the latter is a complex topic area, with clarity anticipated following further work prior to plan finalisation).
- **Biodiversity** - the order of preference and conclusions on significant effects reflect: a concern with Hixon Airfield (also possibly growth at Weston), given proximity to an important wetland site; and support for providing for unmet needs in locations that give rise to relatively limited concerns, in the knowledge that this may reduce pressure on more sensitive locations elsewhere within the sub-region, e.g. close to Cannock Chase SAC. With regards to the six best performing scenarios, there is an argument for predicting positive effects on the baseline, given good net gain potential at strategic sites, and given identified opportunities at both Meecebrook (in particular) and Beacon Hill. However, there is much uncertainty at this early stage.
- **Climate change adaptation** - it is not possible to differentiate between the growth scenarios, with any certainty, in respect of flood risk. All three of the strategic site options are associated with river / stream valleys, but there is little reason to suggest that flood risk would create a major challenge to effective masterplanning, such that there could be pressure to accept any risk. Nor is it possible to differentiate in respect of wider adaptation factors (e.g. overheating risk), albeit there can be an opportunity at strategic sites. With regards to significant effects, there is a need to recall the package of proposed allocations that are a 'constant' across the scenarios, which include a notable site associated with flood risk (Stafford Gateway).
- **Climate change mitigation** - focusing on built environment emissions (with transport emissions a focus of discussion under other headings), the primary consideration is support for directing growth to strategic sites, and larger strategic sites in particular. Meecebrook is considered to represent a clear opportunity; however, there is a need for further work to demonstrate why the site is an appropriate location to focus strategic growth, from a decarbonisation perspective, and explain how decarbonisation objectives fit with the scheme vision, masterplanning principles etc. There is also a need for further work on viability to understand tensions between decarbonisation and wider objectives, e.g. affordable housing, transport and infrastructure. With regards to significant effects, there is a need to recall the package of proposed allocations that are a 'constant' across the growth scenarios, which includes smaller sites not likely to be associated with any particular built environment decarbonisation opportunity; and there is a need to gauge performance in the context of the Borough's ambitious target of achieving net zero greenhouse gas emissions by 2040, which is a fairly ambitious target (albeit it is quite common for local authorities to set 2030 as a net zero target date).
- **Communities** - the key consideration is that Meecebrook represents a significant opportunity, and there is also potentially a notable opportunity to deliver new community infrastructure at Hixon to the benefit of the wider village, although there could also be negative effects felt by the existing community, and there are challenges around secondary school provision. With regards to Beacon Hill, the possibility to make land available for a secondary school (yet to be confirmed) is noted, as is the proposed large country park, plus the site benefits from relatively good connectivity to the Stafford. With regards to the variable package of smaller sites, the potential for expansion of Gnosall to deliver a primary school expansion is noted.

<sup>2</sup> This is because the appraisal is undertaken without any assumptions made regarding the weight, or degree of importance in the decision making process, that should be assigned to each topic, nor is it fair to assume that the topics are of equal weight. The appraisal does serve to highlight concerns with higher growth, under certain topic headings, and the Council – as the decision-makers – might choose to assign particular weight to one or more of these in the 'planning balance'. Also, in respect of any given topic, it is important to recall that the appraisal is not a scientific exercise, in that it reflects a range of judgements.



With regards to significant effects, 'moderate or uncertain significant positive effects' are predicted for scenarios involving Meecebrook. There is clear potential to upgrade this conclusion ahead of plan finalisation.

- **Economy** - strong recent demand for / uptake of employment land, along with a risk of unmet needs from elsewhere, provides an argument for allocating new employment land through the local plan, including at sites that are a variable across the scenarios, including at a mixed use new settlement (Meecebrook or Hixon Airfield) and/or at CRE02 (an extension to the successful Redhill Business Park). However, there is uncertainty ahead of an update to the Economic and Housing Development Needs Assessment (EHDNA). In simple quantitative terms the current evidence suggests a risk of an over-supply, but there are a range of qualitative considerations, for example around shifts in jobs density / automation at warehousing sites.
- **Health and wellbeing** - there are clear arguments for supporting strategic growth locations over-and-above smaller urban extensions. However, on balance, the scenarios are judged to perform broadly on a par. With regards to significant effects, there are wide ranging positives effects and potential tensions, mindful of the wide range of health determinants, but significance is potentially somewhat limited.
- **Historic environment** - there is support for growth at Hixon Airfield (in particular) and Beacon Hill, and there is also an argument for scenarios including Meecebrook, as this area is subject to relatively limited historic environment constraint in the context of new settlement options of this scale (subject to further investigation, e.g. in respect of traffic through Eccleshall), plus allocation could potentially serve to reduce development pressure on constrained locations elsewhere sub-regionally. With regards to significant effects, on balance, it is considered appropriate to flag 'moderate or uncertain' negative effects only for Scenario 1, given concerns in respect of growth close to two conservation areas (Gnosall, and the Trent and Mersey Canal).
- **Housing** - there is a clear need to rank the growth scenarios according to total quantum. With regards to significant effects, on balance, significant positive effects are predicted for those scenarios that would enable provision for unmet needs in quantitative terms, although there is also a need to consider whether growth locations would be suited to meeting unmet needs. Even the lowest growth scenario potentially represents a proactive approach, as the housing requirement would be set at a figure above the standard method-derived Local Housing Need (LHN), leading to additional delivery of affordable housing to meet identified needs.
- **Land** – there is a degree of support for directing growth to Hixon Airfield or Beacon Hill, from a perspective of seeking to minimise loss of Best and Most Versatile (BMV) agricultural land. However, there is also an argument for supporting higher growth, given concentrations of BMV land elsewhere in the sub-region. With regards to significant effects, the quantum of agricultural land lost to development could be judged significant.
- **Landscape** – on balance higher growth is judged to give rise to a concern, albeit the effect would certainly be to reduce pressure on one or both of the sub-region's Green Belts. There is support for Hixon Airfield, a concern with Beacon Hill (in particular) and Meecebrook, and also a degree of concern with smaller sites at Hixon and Weston. On balance, scenarios involving CRE02 are not judged to perform worse than those without, but there is some uncertainty. With regards to significant effects, there is a need to recall the package of proposed allocations that are a 'constant' across the growth scenarios, which includes some associated with a degree of sensitivity. On balance, it is appropriate to predict negative effects on the baseline (which, to reiterate, is one whereby there is continued development pressure locally, and increased development pressure elsewhere in the sub-region given unmet housing needs) for those scenarios without Hixon Airfield.
- **Transport** - the key consideration here is judged to be supporting higher growth scenarios, such that there is flexibility to provide for unmet needs (subject to a decision on locally arising needs, including to reflect market signals). Gnosall is not considered to be a strongly performing location from a perspective of meeting unmet needs, but otherwise is associated with a degree of merit, including a good bus service. Beacon Hill is judged preferable to Hixon Airfield, but has its transport challenges. With regards to significant effects, there is a need to recall the 'constant' allocations, for example: Stafford Station Gateway (strongly supported); Land at Ashflats (well connected to the M6, but less so Stafford town centre); and Woodseaves (a rural settlement, distant from higher order centres). On balance, 'moderate or uncertain positive effects' are predicted under scenarios that would lead to clear potential to provide for unmet needs; however, all of the scenarios are associated with uncertainties at this stage, e.g. with limited transport modelling having been completed.
- **Water** - there is support for strategic schemes, and larger strategic schemes in particular, which suggests a degree of support for Meecebrook, plus there may be a degree of locational opportunity, noting association with the Meece Brook. However, it is too early to conclude support for Meecebrook with any certainty, ahead of further evidence-gathering and discussions with the water company and the Environment Agency. With regards to significant effects, there is a clear need to flag 'moderate or uncertain negative effects' at this current stage, taking a precautionary approach ahead of consultation and further work, including potentially a detailed water cycle study to update the scoping study completed in 2020. It is recognised that good management of water resources and water quality is high on the national agenda at the current time.

## The preferred growth scenario

The following is the response of the Borough Council's officers to the appraisal / officer's reasons for supporting the preferred growth scenario (N.B. this text has not been prepared by AECOM, and is not an 'appraisal' in the SA sense):

**Reasonable growth scenario 6a** is taken forward as the preferred option for the local plan. Under this scenario the housing supply (630 dpa) is sufficient to enable housing requirement to be set at 535 dpa, reflecting 435 dpa locally arising need (LHN uplifted to reflect market signals in respect of employment growth) plus 100 dpa unmet needs (2,000 homes in total). There is a need for further discussions with relevant local planning authorities in respect provision for unmet needs.

With regards to employment land, the proposal is to allocate significant additional land through the local plan, leading to a total supply of 156 ha. At the current time, this is considered to be an appropriate level of supply, given the risk of some of this supply not coming forward in practice, and also the risk of some existing employment land being lost. However, it is recognised that there is a need to avoid an over-supply relative to housing growth. An update to the Economic and Housing Development Needs Assessment (EHDNA) will be undertaken subsequent to the consultation in order to explore this further.

The appraisal shows growth scenario 6a to perform well in a number of respects, with a ranking of "1" under four topic headings, and positive effects on the baseline predicted under four headings. A number of the key benefits relate to the broad strategy and support for a new settlement at Meecebrook, which has clear potential to deliver a range of benefits, including new community infrastructure (reducing the pressure on existing infrastructure, particularly schools and GPs) employment land and a new rail station.

However, the appraisal also serves to highlight a number of tensions with sustainability objectives, and drawbacks relative to alternative growth scenarios. In particular:

- Air quality – the appraisal finding reflects a risk of an imbalance between housing and employment growth potentially leading to unsustainable commuting patterns. However, the appraisal finding reflects the precautionary principle at this early stage. As discussed, there will be further detailed work undertaken.
- Historic environment – the appraisal reflects a degree of concern with Meecebrook Garden Community, but there is confidence in the ability to address concerns through masterplanning, design etc, including through a Masterplan Supplementary Planning Document (SPD) prepared in consultation with Historic England.
- Housing – the appraisal naturally favours higher growth scenarios, i.e. scenarios whereby the housing requirement could be set above 535 dpa to meet more locally arising needs (including affordable housing, and possibly in response to employment growth / market signals) and/or to meet more unmet needs from one or both of the constrained urban conurbations to the north and south of the borough. However, there are clear draw-backs to higher growth, and it is believed a housing requirement of 535 dpa represents a good balance and a proactive approach to boosting housing supply.
- Land – it is accepted that Hixon Airfield, and potentially also Beacon Hill, are likely preferable locations for strategic growth from a perspective of wishing to minimise loss of best and most versatile (BMV) agricultural land. However, both sites are associated with a range of drawbacks relative to Meecebrook.
- Landscape – it is accepted that Hixon Airfield performs well, as a potential location for strategic growth, from a landscape perspective. However, once again, there are a range of drawbacks to growth here, and a number of reasons why a strategy involving a focus of growth at Meecebrook is preferable.
- Transport – the appraisal supports Meecebrook, on the assumption of a train station, but suggests a higher growth scenario is preferable, given the importance of meeting unmet needs in broadly suitable locations. The highest growth scenario, favoured by the appraisal, would see allocation of Beacon Hill in addition to Meecebrook, but this site is not without its transport challenges.

# Appraisal of the draft local plan

Part 2 of the Interim SA Report presents an appraisal of the current draft ('preferred option') version of the local plan as a whole. In practice, the appraisal builds upon the appraisal of Growth Scenario 6a presented above, with additional consideration given to: site allocations that are a 'constant' across the reasonable growth scenarios; and draft policies (both borough-wide and site-specific).

The overall appraisal conclusion is presented below.

## Conclusion on the draft local plan as a whole

The appraisal predicts mixed effects, as is typically the case with local plans. Positive effects on the baseline (which, it is important to recall, involves a situation whereby development continues to come forward and in a relatively unplanned manner) are predicted under several topic headings and, in two instances, the prediction is that positive effects will be 'significant'.

However, under several other topic headings there are clear tensions between the local plan and sustainability objectives, potentially to the extent that the local plan could result in a negative effect on the baseline (even recognising that the baseline situation is one whereby there are unmet housing needs across the sub-region and/or development comes forward in a relatively unplanned manner).

The following bullet points set out the range of predicted effects:<sup>3</sup>

- **Employment** – a proactive approach to employment land is supported, with a proposed supply well in excess of the established need figure, although a 'supply buffer' is appropriate, and the need figure is subject to review through an updated Economic and Housing Development Needs Assessment.
- **Communities** – directing housing growth so as to deliver new community infrastructure, and avoid breaching the capacity of existing community infrastructure, has been a primary 'driver' of the spatial strategy and site selection process, e.g. the decision to direct a high proportion of growth to Meecebrook. However, the Viability Study (2022) concludes that a Community Infrastructure Levy (CIL) is not viable.
- **Housing** – the proposal is to set the housing requirement at a figure significantly above the established Local Housing Need (LHN) figure that derives from the Government's standard methodology. One of the effects will be to deliver additional affordable housing; however, there is a concern regarding the proposal to require just 20% affordable housing at some settlements.
- **Climate change mitigation** – focusing on emissions from the built environment (as opposed to transport), the strategy of directing a high proportion of growth to strategic sites, and Meecebrook in particular, is supported. Also, the proposal is to set stringent development management policy, requiring new homes to achieve emissions standards over-and-above Building Regulations.
- **Transport** – the proposal to meet a proportion of unmet housing needs from elsewhere within a constrained sub-region is supported in a number of respects, including in transport terms, because of the importance of meeting needs in locations well connected to where the needs arise from. In particular, Meecebrook is set to be well-connected by rail, assuming delivery of a new station.
- **Air quality** – the plan gives rise to few concerns regarding increased traffic through a known hotspot, namely an Air Quality Management Area (AQMA). However, there is a need for further work to consider traffic flows, and particularly from Meecebrook, given a range of uncertainties, including in respect of strategic road upgrades, bus connectivity and the aforementioned train station.
- **Biodiversity** - the proposed allocations give rise to certain tensions, but primarily in respect of locally and non-designated habitats, as opposed to nationally or internationally designated, and the approach of planning for a proportion of unmet needs from elsewhere in the sub-region is tentatively supported. However, the proposal is to require only 10% biodiversity net gain, in light of viability considerations.
- **Health and wellbeing** – focusing on Meecebrook, there is a clear opportunity on account of its scale, in respect of green and blue infrastructure, and wider health considerations. However, there is a need

<sup>3</sup> **Red** indicates a significant negative effect; **amber** a negative effect of limited or uncertain significance; **light green** a positive effect of limited or uncertain significance; and **green** a significant positive effect. **No colour** indicates a neutral effect.

for further work, for example in respect of avoiding / buffering a high pressure gas pipeline, and ensuring that a polycentric built form is not a barrier to a well-integrated and connected community.

- **Water** – as per a number of other topic headings, the strategy of directing a high proportion of growth to a large-scale new garden community is supported, and there may be a degree of locational opportunity at Meecebrook. However, there remains uncertainty regarding what level of ambition can be achieved, both in terms of water resources and water quality objectives, given cost implications.
- **Landscape and historic environment** – factors have clearly been a key influence on site selection, with a number of the proposed allocations giving rise to limited concerns. There are a range of concerns with Meecebrook, including regarding containment; however, concerns are relatively limited, for a site of this scale, and there will be good potential to address issues through masterplanning.
- **Land and soils** – a fairly limited proportion of growth is set to be directed to previously developed land; however, there is no identified ‘reasonable alternative’ strategy that would perform better in this respect. With regards to the greenfield allocations, avoiding the loss of better quality agricultural land appears not to have had a major bearing on the spatial strategy and site selection process.
- **Climate change adaptation** – certain of the sites are subject to a significant degree of flood risk, in particular Stafford Station Gateway, albeit the scheme is supported in wide ranging other respects.

## Cumulative effects

The SEA Regulations, which underpin the SA process, indicate that stand-alone consideration should be given to ‘cumulative effects’, i.e. effects of the Local Plan in combination with other plans, programmes and projects that can be reasonably foreseen. In practice, this is an opportunity to discuss potential ‘larger than local’ effects. The following bullet points cover some key considerations:

- **Housing needs** – this is a primary ‘larger than local’ consideration, with a need to consider known, likely or potential unmet needs from one or both of the nearby constrained urban areas (surrounded by Green Belt). The proposal is to provide for 2,000 homes unmet needs.
- **The economy** – there will be a need to ensure that employment land is provided in line with sub-regional objectives, including in respect of economic growth along transport corridors.
- **Transport corridors** – there is a need to work with National Highways and Network Rail to consider capacity on the strategic transport network, mindful of growth / growth options in neighbouring areas.
- **Cannock Chase Special Area of Conservation (SAC)** – the matter of in-combination impacts within the 15km Zone of Influence is a focus of a stand-alone Habitats Regulations Assessment.
- **Green Belt** – there is a need to support the integrity of the two Green Belts intersecting the borough.
- **Canals** – the canals passing through the borough are a clear larger than local consideration. Growth could direct funds to maintenance and improvement, in line with strategic objectives.
- **Facilities** – can be of sub-regional importance, such as former university facilities at Stafford.
- **Decarbonisation** – new garden communities represent an opportunity to progress best practice nationally, and this is particularly the case for large scale new garden communities such as Meecebrook. A sub-regional modular construction facility could be considered, also potentially support for hydrogen.
- **Agricultural land** – self-sufficiency of food projection is increasingly a key national consideration.
- **Water** – as well as water quality objectives, there is a need to consider aquifers that cross administrative boundaries, and other factors considered through Catchment Abstraction Management Strategies and Water Resource Management Plans.
- **Landscape scale nature recovery** – there is a need to focus efforts on achieving conservation and ‘net gain’ objectives, in respect of biodiversity and wider natural capital and ecosystem services, at landscape scales, including broad character areas. A Local Nature Recovery Strategy (LNRS) will be forthcoming, under the Environment Act 2021, but steps must be taken in the interim. Aside from matters relating to Cannock Chase SAC, another key focus can be river corridors, most notably the River Trent. Views on strategic issues / opportunities are sought through the current consultation.

# Next Steps

## Plan finalisation

Subsequent to the current consultation it is the intention to prepare the proposed submission version of the local plan for publication in-line with Regulation 19 of the Local Planning Regulations 2012. This will be a version that the Council believes is 'sound' and intends to submit for Examination. Preparation of the 'Publication' Local Plan will be informed by consultation responses, SA and wider evidence.

The formal, legally required SA Report will be published alongside the Publication Local Plan.

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

At Examination, the Inspector will consider all evidence before then either reporting back on soundness or identifying the need for modifications. Following completion of the Examination, and assumed the plan is found to be sound and legal compliant, it will be adopted by the Council.

## Monitoring

At the current time, in-light of the appraisal, it is suggested that monitoring efforts might focus on:

- Employment land requirements – will require close monitoring, given evolving regional and national context. In particular, the needs of the warehousing / distribution sector are subject to change.
- Housing – the Council already monitors numerous housing delivery related matters through the Authority Monitoring Report, and indicators should be kept under review. There is a need to closely monitor affordable housing delivery by sub-area / viability zone across the borough.
- Agricultural land – it is possible to monitor loss of agricultural land by grade.
- Climate change adaptation – potentially monitor housing in close proximity to a fluvial flood zone (in addition to intersecting); also the 1 in 30 year surface water flood zone.
- Climate change mitigation – it could be appropriate to monitor the proportion of new homes linked to a heat network; also the proportion of homes delivered to standards of sustainable design and construction that exceed building regulations. More generally, there is a need to carefully consider how local plan monitoring links to monitoring of borough-wide emissions.
- Water – ongoing consideration should be given to any risk of capacity breaches at Wastewater Treatment Works (WwTWs) and other risks to the status of water courses. Also, there is a need for ongoing consideration of whether the 'water stressed' nature of the sub-region, and potentially specific aquifers within the sub-region, is such that there is a need to limit further growth.

