

Revised Sustainability Appraisal Report Addendum



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1 Introduction

1.1 The Revised Sustainability Appraisal Report of The Plan for Stafford Borough - Publication was prepared and published in January 2013. The Plan for Stafford Borough - Publication contains the proposed spatial strategy for the Borough to 2031, including Strategic Development Location allocations for Stafford and Stone as well as detailed planning policies. This document is an addendum to the Revised Sustainability Appraisal Report and should be read in association with it, together with the Planning Strategy Statement, which provides a context for the addendum.

1.2 A Sustainability Appraisal (SA) is a necessary requirement when preparing plans affecting land, to comply with a European Directive and Government Guidance.

1.3 The Sustainability Appraisal methodology, also called the Sustainability Appraisal Framework, used in assessing the sustainability of a site or policy was outlined in the Scoping Report (September 2007). The Scoping Report initially identified the objectives which had been set locally and established a simple scoring mechanism to assess whether the impact of the site or policy will have a major positive, minor positive, major negative or minor negative impact on achieving the sustainability objective, neutral impact or that the effects are uncertain or depend on implementation of the policy. The purpose of the process is to assess sustainability, not other planning policy constraints. Sustainability Appraisal only forms one element of the decision making process to be considered before a site is included within The Plan for Stafford Borough.

1.4 Following consultation on two SA Commentary documents, the SA Report and the Sustainability Appraisal of the Strategic Policy Choices, additional questions, indicators and targets have been included to illustrate how policies are appraised against the SA objectives. The following sections set out what options have been subject to Sustainability Appraisal and at what stage of the plan making process. A full account of alternative options appraised is contained in Appendix V of the Revised Sustainability Appraisal Report.

Alternative Development Strategy Options

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

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

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

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

1 Introduction

- Haughton
- Woodseaves
- Tittensor
- Yarnfield
- Ladfordfields Industrial Estate
- Raleigh Hall Industrial Estate
- Hixon Airfield Industrial Estate
- Strategic Policy Choices

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

1.8 The 10 policy choices were:

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

1.9 Through the process of seeking representations on The Plan for Stafford Borough - Publication (January 2013) an alternative site was submitted, which had not previously been appraised as a reasonable alternative. The site, known as Clarkes Farm, has been promoted to provide 1,000 dwellings north east of Stafford. Also, the Sustainability Appraisal did not make explicit consideration of the development potential of land west of the M6 in Stafford or land south west of Stone. Conclusions on which were reached early in the plan making process. Broad locations west of the M6, and Clarkes Farm, are addressed in this Addendum. All alternative options have been appraised using the Sustainability Appraisal Framework and the relevant information contained in the The Plan for Stafford Borough - evidence base, which was also the basis for the Sustainability Appraisal of the other Strategic Development Locations.

Sustainability Appraisal of Clarkes Farm, Stafford 2

2 Sustainability Appraisal of Clarkes Farm, Stafford

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

Key of Sustainability Appraisal

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

Sustainability Appraisal time frames

Policy Alternative: Clarkes Farm, Stafford

SA Obj	Indicators	Effects over time			Comments
		Short	medium	long	
1	Employment rate	0	√/?	√/?	Increased employment opportunities over medium to longer term linked to delivery of housing and associated infrastructure
2	Employment land	0	0	0	Proposal does not include reference to employment land
3	Vacant units	?	√	√	Proposal aims to create a sustainable urban extension
4	Farm diversification, affordable housing	x	x	x	Loss of agricultural land
5	Developments contrary to EA	?	?	?	Whilst the site does not lie in flood zone 2 or 3, there is a brook running through the site and impact of development on this is currently unknown. Towards the south east of the site there are known flooding issues as a result of run off from surrounding land.
6	Affordable housing	√	√	√	Whilst the proposal does not make specific reference to affordable housing or a range, it is assumed this will be provided in line with national and local planning policy
7	Public Transport access	x	x	x	Whilst the site is on the edge of Stafford, due to existing access tracks the site is approximately 650 metres from a main road and is currently not considered sustainable due to limited public transport to the east of Stafford, more than 30 minute walking time to Stafford centre, more than 20 minutes cycling time. Bus journey times are approx 20 minutes for the adjacent employment use.
8	Crime	?	?	?	Depends on layout and design

2 Sustainability Appraisal of Clarkes Farm, Stafford

Policy Alternative: Clarkes Farm, Stafford					
9	Noise and light impacts	?	?	?	Depends on layout and design
10	Natural greenspace	?	?	?	Depends on layout and design and relationship between urban area and rural area
11	Renewable Energy	?	?	?	Development will contribute towards climate change but could be offset through improved public transport, walking and cycling links, energy efficient design and on site solutions
12	SSSI quality	?	?	?	There are a number of protected and BAP species along with ponds and a visually prominent woodland at the site.
13	Development on PDL	x	x	x	The proposal does not include any brownfield land and would result in the loss of agricultural land
14	River Quality	?	?	?	Due to the topography, surface run off is an issue. Increased run off could not only lead to flooding issues but impact on water quality.
15	Buildings at risk	x/?	x/?	x/?	It is not considered that any significant buildings would be impacted by this proposal. Landscape quality in this area, due to topography and prominence of Beacon Hill woodland would be detrimentally impacted, particularly by strategic allocation 2, which wraps around the woodland. In landscape terms, the policy for this area is landscape maintenance and landscape enhancement. Without knowing details on design and layout it is difficult to determine the impact on these principles. Historic environment evidence shows this area was predominately 18th/19th Century planned field system and attributes medium sensitivity to it.
16	Household change	0	0	0	Neutral Impact
17	Attitude to area	0	0	0	Neutral Impact
18	Compliance with SCI	0	0	0	Neutral impact
19	Voluntary organisations	0	0	0	Neutral Impact
20	Wellbeing	?	?	?	Whilst impact on well being is unknown and difficult to quantify, concern over the impact on Beacon Hill have been raised through previous consultation on the development strategy.
Overall the proposal does not offer a sustainable alternative to the extension of Stafford. The appraisal identifies uncertain effects concerning matters such as layout, design etc and negative impacts associated with the development of a Greenfield site. Furthermore there are major issues regarding limited access to the town through public transport, cycling or walking, surface water run off and the impact on surrounding uses of this and landscape due to the topography of the land and woodland.					

Sustainability Appraisal of sites west of M6 3

3 Sustainability Appraisal of sites west of M6

SA Obj	Indicators	Effects over time			Comments
		Short	medium	long	
1	Employment rate	0	√/?	√/?	Increased employment opportunities over medium to longer term linked to delivery of housing and employment and associated infrastructure
2	Employment land	0	√/?	√/?	Increased employment opportunities over medium to longer term linked to delivery of housing and employment and associated infrastructure
3	Vacant units	?	?	?	Dependent on specific location, there could be scope for brownfield development
4	Farm diversification, affordable housing	?/x	?/x	?/x	Whilst development in this area could meet some rural needs, dependent on the scale there could be a negative impact on the character of rural settlements of Seighford, Derrington and smaller hamlets
5	Developments contrary to EA	x	x	x	There are flood issues associated with the wetlands of Doxey marshes and Doxey Brook.
6	Affordable housing	√	√	√	Assumes a strategic site would provide affordable housing in line with national and local planning policy
7	Public Transport access	x	x	x	There is some existing public transport to Seighford and Derrington but this limited and in some cases not located directly adjacent to settlements. There are limited services and facilities in the nearby settlements outside of Stafford.
8	Crime	?	?	?	Depends on layout and design
9	Noise and light impacts	x	x	x	There would be noise impacts from the M6 in this location.
10	Natural greenspace	?/√	?/√	?/√	There are some existing green links to this side of the M6 from Stafford which would contribute towards healthy lifestyles
11	Renewable Energy	?	?	?	Development will contribute towards climate change but could be offset through improved public transport, walking and cycling links, energy efficient design and on site solutions
12	SSSI quality	?	?	?	There are many protected species, water courses, ponds, hedgerows and BAP species in this area which could be impacted by large development

3 Sustainability Appraisal of sites west of M6

Policy Alternative: Area north west of M6					
13	Development on PDL	x	x	x	There could be some scope for brownfield development in this location but this would be limited and overall development would result in the loss of Greenfield land
14	River Quality	?	?	?	There are a number of tributaries of the Doxey Brook in this location. Development could impact on the flow and quality of these brooks.
15	Buildings at risk	x	x	x	The majority of this broad location is attributed to high sensitivity in terms of historic landscape character with a landscape policy aim of landscape conservation.
16	Household change	?	?	?	Uncertain impact
17	Attitude to area	?	?	?	Uncertain impact
18	Compliance with SCI	0	0	0	Neutral impact
19	Voluntary organisations	0	0	0	Neutral impact
20	Wellbeing	?	?	?	Large development west of the M6 may act as a divide between existing and new communities within Stafford which in turn could impact on well being.

It is considered development in this broad location would lead to significant travel by car to access services and facilities, which would not realistically be accessible by walking, cycling or public transport. Whilst there is some green links to Stafford town it is not considered this would always be a suitable way to access all services. There would be severance issues in terms of trying to create links with existing communities as well as significant development having a negative impact on the character of existing rural settlements. Overall it is not considered that large scale development to meet the development strategy for Stafford, in this location would be as sustainable as other options.

Policy Alternative: Area south west of M6		Effects over time			Comments
SA Obj	Indicators	Short	medium	long	
1	Employment rate	0	√/?	√/?	Increased employment opportunities over medium to longer term linked to delivery of housing and employment and associated infrastructure
2	Employment land	0	√/?	√/?	Increased employment opportunities over medium to longer term linked to delivery of housing and employment and associated infrastructure
3	Vacant units	?	?	?	Dependent on specific location, there could be scope for brownfield development
4	Farm diversification, affordable housing	?/x	?/x	?/x	Whilst development in this area could meet some rural needs, dependent on the scale there could be a negative impact on

Sustainability Appraisal of sites west of M6 3

Policy Alternative: Area south west of M6			
			the character of rural settlements of Seighford, Derrington and smaller hamlets
5	Developments contrary to EA	?	There are no known flood issues in this location
6	Affordable housing	√	Assumes a strategic site would provide affordable housing in line with national and local planning policy
7	Public Transport access	x	There is some existing public transport to Hyde Lea and Copenhall but this limited. The location is approximately 1.5km from the nearest district centre at Stafford. There are limited services and facilities in nearby settlements outside of Stafford.
8	Crime	?	Depends on layout and design
9	Noise and light impacts	x	There would be noise impacts from the M6 in this location.
10	Natural greenspace	?/√	There are some existing green links to this side of the M6 from Stafford which would contribute towards healthy lifestyles
11	Renewable Energy	?	Development will contribute towards climate change but could be offset through improved public transport, walking and cycling links, energy efficient design and on site solutions
12	SSSI quality	?	There are many protected species, water courses, ponds, hedgerows and BAP species in this area which could be impacted by large development
13	Development on PDL	x	There could be some scope for brownfield development in this location but this would be limited and overall development would result in the loss of Greenfield land
14	River Quality	?	Uncertain impact
15	Buildings at risk	x	The majority of this broad location is attributed to high and medium sensitivity in terms of historic landscape character with a landscape policy aim of landscape conservation.
16	Household change	?	Uncertain impact
17	Attitude to area	?	Uncertain impact
18	Compliance with SCI	0	Neutral impact
19	Voluntary organisations	0	Neutral impact
20	Wellbeing	?	Large development west of the M6 may act as a divide between existing and new communities within Stafford which in turn could impact on well being.

3 Sustainability Appraisal of sites west of M6

Policy Alternative: Area south west of M6

It is considered development in this broad location would lead to significant travel by car to access services and facilities, which would not realistically be accessible by walking, cycling or public transport. There would be severance issues in terms of trying to create links with existing communities as well as significant development having a negative impact on the character of existing rural settlements. Overall it is not considered that large scale development to meet the development strategy for Stafford, in this location, would be as sustainable as other options.

Sustainability Appraisal of site South West of Stone 4

4 Sustainability Appraisal of site South West of Stone

SA Obj	Indicators	Effects over time			Comments
		Short	medium	long	
1	Employment rate	0	√/?	√/?	Increased employment opportunities over medium to longer term linked to delivery of housing and employment and associated infrastructure
2	Employment land	0	√/?	√/?	Increased employment opportunities over medium to longer term linked to delivery of housing and employment and associated infrastructure
3	Vacant units	?	?	?	There is limited scope for brownfield development in this location
4	Farm diversification, affordable housing	x	x	x	Limited positive - Stone acts as a service centre for the rural hinterland and development could meet a proportion of rural needs, depending on the nature of the development.
5	Developments contrary to EA	?	?	?	There is no known flood issues in this area
6	Affordable housing	√	√	√	Assumes a strategic site would provide affordable housing in line with national and local planning policy
7	Public Transport access	x	x	x	This area of Stone has limited access via a narrow road and is approximately 1km to the nearest service centre at Walton
8	Crime	?	?	?	Depends on layout and design
9	Noise and light impacts	?	?	?	Depends on layout and design
10	Natural greenspace	?	?	?	Depends on layout and design and relationship between urban area of Stone and rural area
11	Renewable Energy	?	?	?	Development will contribute towards climate change but could be offset through improved public transport, walking and cycling links, energy efficient design and on site solutions
12	SSSI quality	?	?	?	Uncertain impact however there are a number of ponds in this location which could have biodiversity value
13	Development on PDL	x	x	x	Loss of agricultural land
14	River Quality	?	?	?	There is a brook and a number of ponds in this location. In addition development needs to consider impact on Pirehill Wastewater Treatment Works
15	Buildings at risk	?	?	?	The majority of this broad location is attributed to low sensitivity in terms of historic landscape character but is

4 Sustainability Appraisal of site South West of Stone

Policy Alternative: Area South west of Stone			
			surrounded by land that is attributed with high sensitivity. The area has a landscape policy aim of landscape maintenance and conservation.
16	Household change	0	0
17	Attitude to area	0	0
18	Compliance with SCI	0	0
19	Voluntary organisations	0	0
20	Wellbeing	?	?
Overall the proposal does not offer a sustainable alternative to the extension of Stone. The appraisal identifies uncertain effects concerning matters such as layout, design etc and negative impacts associated with the development of a Greenfield site. Furthermore there are major issues regarding limited access to the town through public transport, cycling or walking.			

5 The Findings

5.1 The Clarkes Farm proposal raises a number of sustainability concerns, particularly on biodiversity, landscape, relationship to the town in terms of character, movement and access, and surface run off implications. The area is in a prominent location within the landscape, on the edge of Stafford and there is insufficient information to be certain about likely impacts. The impact on air and water quality is also uncertain. The proposal envisages the creation of 1,000 dwellings, but this could potentially promote commuting via the car to other settlements without significant improvements in access to the site and linkages to other areas, meaning many potential positive benefits, such as meeting local housing needs and education near to existing employment and the MOD land use, would not be achievable in the short to medium term. Beaconside road could be a barrier to movement to the town centre itself. The location sits behind employment uses and adjacent to MOD uses, and there is potential that the development will lead to three separate areas with little scope for linkages and movement between each location, undermining several of the objectives of The Plan for Stafford Borough, for example Spatial Vision d and f and Key Objective 2.

5.2 Land south west of Stone raises a number of sustainability concerns, particularly in relation to landscape, relationship to the town in terms of character, movement and access. The impact on many sustainability appraisal objectives is uncertain.

5.3 Development west of the M6 Motorway has many uncertain and negative impacts, particularly in relation to landscape, impact on the rural character of the area and existing settlements, and increasing the need to travel by car to access employment, services and facilities. It is not considered that development west of the M6 is a reasonable alternative to the locations outlined in The Plan for Stafford Borough.

6 Comparison to other directions of growth

6 Comparison to other directions of growth

6.1 The Strategic Development Locations at Stafford and Stone have been appraised in both The Sustainability Appraisal Report (September 2011) and the Revised Sustainability Appraisal Report (January 2013). Sustainability impacts have been raised through the appraisal process and where possible, incorporate into the relevant policy. The appraisal of Clarkes Farm and land south west of Stone does not demonstrate that either location offers a more sustainable option that the three Strategic Development Locations for Stafford and one Strategic Development Location for Stone. Land to the West of the M6 is not considered a reasonable alternative to meeting the development strategy for Stafford compared against other options.

6.2 All options score negatively against sustainability appraisal objective 13 due to the loss of Greenfield land. All options are assessed as being neutral or uncertain regarding sustainability appraisal 8, 9, 17, 18, 19 and 20. The appraisal indicates that Clarkes Farm scores negatively against Sustainability Appraisal Objective 3, 7, 13 and 15.