

Responses and Officer Comments to Sustainability Appraisal Scoping Report

General Comments	
English Heritage	<p>The Environmental/ Sustainability Report should: Describe mitigation measures to prevent, reduce or offset significant adverse effects, and also recommendations for improving beneficial effects. These, together with other key recommendations for the modification of a plan or programme, should be clearly set out in the main body of the Environmental Report and in the Non-Technical Summary.</p> <p>They should not be confined to appendices;</p> <ul style="list-style-type: none">• Indicate the likely effectiveness of the mitigation measures.• Identify strategic mitigation rather than being too detailed and overly prescriptive, but vague, generalised statements should be avoided. The level of specificity in terms of mitigation will depend on the level of the plan being assessed, e.g. for an Area Action Plan it might be appropriate for the report to propose quite detailed mitigation proposals to offset any adverse impacts that cannot be avoided or to promote measures that would benefit the historic environment;• Consider the need for exceptional measures;• Consider remote compensation. This option is rarely appropriate for the historic environment because of its site specific and infinite nature. If it can be achieved, it should only be employed as a last resort.• Cascade requirements to projects, where relevant. Mitigation measures should be picked up in EIA for qualifying projects and be incorporated into design/ planning briefs.• Identify responsibility for, commitment to and mechanisms for delivering mitigation. This should be an integral part of the monitoring process. The Environmental/Sustainability Report should also:• Record how the plan changes in response to the SEA/SA;• Clearly identify where recommendations of the SEA/SA have not been incorporated in the plan, together with an explanation of why not. <p>Set out how comments at earlier stages on the treatment of the historic environment in the appraisal process have been taken into account. Examples of possible mitigation measures for the historic environment might include:</p> <ul style="list-style-type: none">• A change in policy options e.g. housing renewal areas and degree of refurbishment and redevelopment;• Strengthened references to the historic environment in the policy framework, criteria and guidance e.g. addition of a specific historic environment policy, regeneration policies; planning obligations SPD guidance;• Preparation of detailed historic environment policy guidance e.g. SPD, design guides;

	<ul style="list-style-type: none"> • Undertaking of detailed historic characterisation studies to inform development; • Historic environment requirements (e.g. archaeological provisions) for project EIAs; • Use of Article 4 Directions to protect the character of conservation areas; In very exceptional circumstances the dismantling and reconstruction of a building may be justified (remote compensation), although this is more likely to be identified at the project level. We trust that the above comments will be of help in taking forward the appraisal. We would be happy to discuss any of our recommendations in more detail. <p>Finally, we should like to stress that this response is based on the information provided by you. To avoid any doubt, this does not reflect our obligation to provide further advice and, potentially, object to specific proposals which may subsequently arise (either as a result of this consultation or in later versions of the plan/guidance) where we consider that, despite the SA/SEA, these would have an adverse effect upon the environment.</p>
Change made to Sustainability Appraisal documents	Noted - information will be used when appraising more detailed locations and sites against the SA framework.
English Heritage	<p>Overall the Scoping Report provides a clear explanation of the appraisal process, the work carried out to date, and planned future work. The linkages between the main body of the text and appendices are clear, and the relationship between each stage in the appraisal process is explained well.</p> <p>Our comments primarily relate to the treatment of the historic environment and our comments on each stage primarily seek to strengthen the consideration of this core topic. The Scoping Report is titled in a general way to apply to the Local Development Framework. English Heritage recommends that Scoping Reports are tailored to the type, purpose, and level of plan under consideration.</p> <p>The tiering of Scoping Reports, through the use of an overarching report and this subsequently fine tuned for particular documents, can help to reduce repetition and give a better focus to the appraisal framework. In the case of the current consultation the tailoring of subsequent Scoping Reports is likely to be necessary to reflect the respective Local Development Document. Applicable to all stages of the appraisal process the historic environment must be broadly defined - all designated historic assets should be considered together with potential impacts on non-designated features of local historic or architectural interest and value since these can make an important contribution to creating a sense of place, local identity and distinctiveness in both rural and urban areas. Statutory</p>

	<p>designations include Listed Buildings, Scheduled Monuments plus other nationally important archaeological sites, Registered Historic Parks and Gardens, Registered Battlefields, Conservation Areas, and the settings of all these assets. Other important elements of the historic environment, which are often without any statutory protection, include other archaeological remains, locally listed buildings, parks and gardens, landscape and townscape features, the historic character of wider the landscape / townscape, as well as the potential for as yet unrecorded archaeology.</p> <p>English Heritage strongly advises that the conservation and archaeological staff of the Council and County Council are closely involved throughout the preparation of local development documents and their associated appraisal process. They are best placed to advise on: local historic environment issues and priorities, including access to data held in the Historic Environment Record (formerly Sites and Monuments Record); how policies and proposals can be tailored to minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of historic assets.</p>
Change made to Sustainability Appraisal documents	Noted. The Historic Environment section in the technical appendices as been widened to include more information and also cross-reference to the evidence base work currently being undertaken.
Non-technical Summary	
LA21	<p>Issues, Problems, Opportunities are all lumped together - not sure which is which and it will vary depending on our standpoint. Later in the document you only refer to Issues and Opportunities' anyway so it is a bit inconsistent. Regarding sustainability issues the level high levels of deprivation are relative - they are high for Stafford. Also the term 'loss of biodiversity habitats' is odd. Loss of biodiversity is correct - or loss of habitat. The first term ties in with current language.</p>
Change made to Sustainability Appraisal documents	<p>The reference to 'opportunities' to be removed. Key sustainability issue to read 'Loss of biodiversity' rather than loss of biodiversity habitats.</p>

LA21	You now refer to an additional subheading 'community' - i.e. environment, economy, social and community, rather than environment, social and economic. Why? And what is the difference between social and Community here? Need to refer to other key areas with regard to resources, not just soil but clean air and other resources i.e. minerals. In Sustainability Objectives - use of the statutory duty words i.e. 'conserve, restore and enhance' biodiversity. In point 5, do you need to include 'where necessary'?
Change made to Sustainability Appraisal documents	Noted. Additional community objectives have been added as a result of the Community Strategy.
Question SA1 - What do you think the plan objectives for the LDF should be?	
Natural England	We are not clear what you are seeking comment on. The LDF should meet the objective set out in para 1.6 with respect to the SEA Directive. Overall there should be a net improvement in the quality of the built and natural environment as a result of LDF.
Change made to Sustainability Appraisal documents	Noted
Environment Agency	The Environment Agency's aim is to create a better place for people and wildlife, for present and for future generations. We want a better quality of life for people and an enhanced environment for wildlife. This means we need to protect and improve the environment by providing: Cleaner air for everyone; Improved and protected inland and coastal waters; Restored, protected land with healthy soils. To do this, we also need to make some major changes and help everybody achieve: A greener business world; Wiser sustainable use of natural resources. And we need to manage two very real risks by: Limiting and adapting to climate change; and Reducing flood risk.
Change made to Sustainability Appraisal documents	Noted

Stafford Gospel Hall Trust	<p>Having due regard to national objectives and the Regional Spatial Strategy objectives, we suggest the following plan objectives for Stafford LDF:</p> <ol style="list-style-type: none"> a. to ensure that Stafford continues to fulfil its regional role as a strategic centre, where people wish to live, work and invest; b. to support the regeneration of the local rural economy and communities; c. to ensure that the Borough as a whole reaches and maintains its full potential economic activity, whilst meeting its social, community and environmental obligations, including reduced social exclusion and conservation of environmental assets and enhancement of biodiversity. d. to support and enhance local and regional transport within the Borough; e. to create truly sustainable communities with provision for the planned levels of new housing, in attractive, well-designed, adaptable, safe and secure developments supported by a full range of services and social infrastructure.
Change made to Sustainability Appraisal documents	Noted. Responses taken into consideration in the Core Strategy process.
English Heritage	From the outline at paragraph 3.1 the Local Development Framework will comprise three different Development Plan Documents. The purpose of Question 1 is unclear, since each DPD could have varying objectives. Moreover, for the Core Strategy the Spatial Objectives should flow from the Vision and help shape the Spatial Strategy, and finally be reflected in the policy framework.
Change made to Sustainability Appraisal documents	Noted
Question SA2 - Do you have any suggestions for other plans, policies or programmes to be considered through the Sustainability Appraisal process?	
Sport Across Staffordshire and Stoke - on - Trent	Sport Across Staffordshire and Stoke - on - Trent Business plan 2006 – 2009 'Increasingly Active, Healthy and Successful communities'

Change made to Sustainability Appraisal documents	Added to the list of PPP's and examined for technical appendices.
LA21	Add NERC, 2006
Change made to Sustainability Appraisal documents	Added NERC, 2006 and also to technical appendices.
Natural England	The NERC Act 2006 should be added. It places a new legal duty on the Council to in developing the LDF, have regard for the need to conserve biodiversity. We would also advise that the West Midlands Prospectus for Green Infrastructure prepared by WMRA should be included as a reference. In early January 2008 a GOWM endorsed a document known as a Prospectus for Landscapes for Living in the West Midlands will include a biodiversity opportunity map for the region. If possible this should be referenced as it will provide vital guidance on biodiversity enhancement. For more information contact Robert Duff, Natural England.
Change made to Sustainability Appraisal documents	NERC 2006, West Midlands Prospectus for Green Infrastructure, Prospectus for Landscapes for Living in the West Midlands referenced in the list of ppp's and technical appendices.
The Environment Agency	<p>The Environment Agency has a number of plans, which the SA should take into account. The incorporation of these plans into the LDF process will aid their implementation, and help ensure that the LDF is as environmentally sustainable as possible. The following should therefore be taken into account: Stafford Strategic Flood Risk Assessment (SFRA).</p> <p>It is acknowledged that the first phase of this Halcrow report is currently only in draft format, however as it develops it should inform the decision-making process, informing Site Allocations and Development Control Policies regarding flood risk specific to your borough.</p> <p>Trent Catchment Flood Management Plan (CFMP) Catchment Flood Management Plans are documents, which help us to understand the factors that contribute to Flood Risk within a catchment, such as how the land is used, and to recommend the best ways of managing the risk of flooding within the catchment over the next 50 to 100 years.</p>

This document can be used in conjunction with the SFRA that is currently being undertaken for the borough, and may be able to help inform flood risk policies in a location-specific way. Stafford Borough falls within the River Trent CFMP, which is currently being developed. It is a study that considers flooding over an area covering the River Trent catchment and all of its tributaries, which is a total area of over 10,000 square kilometres. The Trent and its tributaries will be assessed as a series of sub-catchments and we will investigate ways of managing their flood risk long term in an environmentally sustainable way. We will produce policies that take into consideration the existing conditions across the area, as well as potential future changes to conditions in the catchment such as: climate change; changes to the way land is used; changes to the rural landscape and the way agricultural land is managed; increased pressure from urban development. All of these changes could have effects on flood risk in the sub-catchments.

Staffordshire Trent Valley Catchment Abstraction Management Strategy (CAMS). The Environment Agency is responsible for managing water resources in England and Wales. One of the ways that this is done is through licensing water abstraction. We developed Catchment Abstraction Management Strategies (CAMS): to inform the public on water resources and licensing practice; to provide a consistent approach to local water resources management; to help to balance the needs of water users and the environment; to involve the public in managing the water resources in their area. Stafford borough is part of the Staffordshire Trent Valley CAMS which was completed in July 2007. The groundwater units which form the structure of CAMS can be relatively large, and therefore will not be able to provide detailed information regarding water resources at specific locations within the borough. It will however, outline the general water resources policy and availability for the area, and as such is relevant to the LDF.

These three Plans link to Sustainability Objective 14.

Groundwater Protection: Policy and Practice The Environment Agency is the statutory body responsible for the protection and management of groundwater resources in England & Wales.

We have set out a framework for our regulation and management of this precious resource in a set of documents, collectively known as **Groundwater Protection: Policy and Practice (GP3)**. In these we describe our aims and objectives for groundwater, our technical approach to its management and protection, the tools we use to do our work and our policies and approach to the application of legislation.

Staffordshire Washlands Partnership - Farming Floodplains For The Future The Staffordshire Washlands Working Group was set-up in May 2003 with representatives from the following organisations: Staffordshire Wildlife

	<p>Trust, Environment Agency, Natural England, RSPB, OnTrent, FWAG, DEFRA and West Midlands Bird Club. Multi-functional wet washlands are promoted through the initiative. Emphasis is placed on sustainable flood defence (retention and attenuation), integrated catchment management, biodiversity gain, water quality, water supply, access and economic benefits. The Plan is focused on the delivery of key wetland habitats outlined in the Staffordshire Biodiversity Action Plan (SBAP) targets for lowland wet grassland, reedbeds, rivers & streams and open water. The prime delivery mechanism is the promotion of agri-environment schemes in co-operation with Environment Agency's flood defence, biodiversity, water resources and fisheries departments. The target to re-create/create 80 hectares of wet grassland by 2010 (page 19) refers directly to this initiative.</p> <p>Environment Agency Policy Regarding Culverts (March 1999). This leaflet sets out Environment Agency policy on culverts. This approach is recommended for other drainage authorities in England and Wales, and it is intended to act as guidance to developers and landowners. It should influence your choice of Site Allocations and could act as a basis for a Development Control Policy regarding the naturalisation of watercourses.</p> <p>A Better Place to Play Environment Agency Strategy for Water-related Sport and Recreation (2006-2011) The Environment Agency have a statutory duty to promote recreation on or near inland and coastal waters, make the best use of the sites we own for recreation and access and take amenity and access into consideration in all of our work. We are the Navigation Authority for a number of waterways, and also have specific guidance in relation to the value of angling. This national strategy document outlines how working in effective partnerships we can increase participation, help governments achieve their targets, and maximise the economic, social and environmental benefits of water-related recreation. This links with Sustainability Objective 10.</p> <p>Soil: A Precious Resource This is the Environment Agency's soil strategy plan. It outlines the way the Environment Agency will protect, restore and manage soils, including action on climate change, flood risk management, sustainable development and agriculture. There are action points in the plan that may be relevant to the LDF process. This links with Sustainability Objective 13. The Environment Agency also directs you towards the guidance documents</p> <p>Water Services Infrastructure Guide and Environmental Quality in Spatial Planning (June 2005) which may be of use to your Authority whilst preparing this plan.</p>
Change made to	Documents added to list of ppp's and looked at for the Technical Appendices.

Sustainability Appraisal documents	
Stafford Gospel Hall Trust	<p>Yes, we suggest the following:</p> <p>National PPPs</p> <ol style="list-style-type: none"> 1. Confident Communities in a Secure Britain: The Home Office Strategic Plan 2004-08: Home Office (2004) 2. Safer Places: The planning system and crime prevention: ODPM/Home Office (2004) 3. Sustainable Communities: Homes for All: ODPM (2005) 4. Strong and Prosperous Communities: Local Government White Paper: DCLG (2006) 5. Healthy Sustainable Communities: bca/nhs: (2004) 6. Diversity and Equality in Planning - A good practice guide - ODPM (2005) 7. Faith and Community: a good practice guide for local authorities: lga (2002) 8. community cohesion - an action guide: lga (2004) <p>Regional PPPs 1. RSS Phase 2 Revision: Preferred Option: WMRA (2007)</p>
Change made to Sustainability Appraisal documents	Added to list of ppps and looked at as part of the review of ppp's in the technical appendices.
English Heritage	<p>We have several suggested additions to Section 4 and Appendix 1, which are detailed below. International add: European Landscape Convention, which the UK Government has signed and ratified. The European Landscape Convention aims to encourage public authorities to adopt policies and measures at local, regional, national and international level for protecting, managing and planning landscapes throughout Europe. Landscape is defined as an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors. The Convention applies this definition to all parts of a country's territory, urban as well as rural areas, to both outstanding and ordinary landscapes, to degraded as well as well-preserved places. It hence adopts a holistic approach to the landscape rather than focusing on special areas. The Conventions definition of landscape and its emphasis on action/interaction, human factors and cultural perspectives is well reflected in English Heritage national programme of Historic Landscape Characterisation. http://www.defra.gov.uk/WILDLIFE-COUNTRYSIDE/issues/landscap/index.htm http://conventions.coe.int/Treaty/en/Treaties/Html/176.htm</p>

National add: The Governments statement on the historic environment The Historic Environment: A Force for our Future published by DCMS in 2001.

Heritage Protection White Paper (March 2007). A summary of its main provisions is given at:

<http://www.helm.org.uk/server/show/nav.11237>

Regional Add: - West Midlands Green Infrastructure Prospectus.

West Midlands Regional Implementation Plan

Note that the Regional Cultural Strategy is due to be reviewed and updated.

The West Midlands Regional Historic Environment Forum is also in the process of developing a Regional Historic Environment Strategy. This is still at a very early stage and unlikely to be completed until the end of 2009. Local:

For subsidiary Scoping Reports it may be relevant to include relevant Conservation Area Appraisals and Management Plans. Whilst we generally welcome the inclusion of a supporting analysis for the plan review, we consider that the format and content of the table given in Appendix 1 is not particularly helpful and could be significantly improved. There is no analysis of implications for the plan (the three DPDs forming the LDF?), whilst the analysis of implications for the sustainability appraisal relies on general statements rather than any specific consideration of the implications of the respective document for the SEA/SA objectives.

Of particular concern is the analysis of historic environment aspects (under objective 15) which is poor and inadequate. The outline of PPG15 under the first two columns is confused, implications for the plan and sustainability appraisal are not drawn out (i.e the primary issue should be protecting and enhancing the historic environment), and no consideration is given to other key documents such as PPG16, Force for our Future etc, and other local documents listed in Section 4 (e.g. Draft Heritage Strategy, Historic Landscape Characterisation). Moreover, the review of the Stafford Economic Development Strategy focuses on nature conservation “ why is this here and not under objective 12? This latter issue reinforces our later comments on the scope and content of objective 15. In addition to the plans/programmes/policies highlighted above that directly relate to the historic environment we also wish to highlight the following links to the historic environment in other relevant PPS/PPGs. This is relevant in terms of the derivation of sustainability objectives and the recommended improvements to the analysis:

PPS 1: Delivering Sustainable Development - reference to protecting and enhancing the historic environment and the quality and character of the countryside, [Paragraph 5; ensuring high quality design [Paragraph 5]; a high level of

	<p>protection to the most valued townscapes and landscapes [Paragraph 17]; enhance as well as protect the historic environment and landscape and townscape character [Paragraph 27(ix)]; promotion of design which is appropriate for its context [Paragraph 34-5]; reinforcement of local distinctiveness [Paragraph 38]</p> <p>PPS 3 Housing: the importance of respecting local character (paras. 48-49).</p> <p>PPS 7: Sustainable Development in Rural Areas - paragraphs 12, 15, 16, 17 and 34 are of particular relevance to the historic environment. PPS7 recognises that many country towns and villages are of considerable historic and architectural value. The document seeks a commitment to good design that makes an important contribution to local identity and regional diversity. It supports the re-use of existing buildings in the countryside where this would meet sustainable development objectives and the need to preserve buildings of historic or architectural importance. It identifies that the historic environment has a role in the economics of the region through tourism and leisure.</p> <p>PPS 22: Renewable Energy [Paragraph. 9 (World Heritage Sites); Paragraph 11 (other nationally-designated areas)]</p>
<p>Change made to Sustainability Appraisal documents</p>	<p>Documents added and looked at as part of assessing ppp's for the technical appendices.</p>
<p>English Heritage</p>	<p>We recommend that there is a clear commitment to keep under review the data sources during subsequent stages of the appraisal. We also recommend that the reporting process clearly identifies gaps in the baseline data and includes a commitment to consider how these can be addressed as part of the appraisal process for current and future Local Development Documents. Other general advice includes the use of both quantitative and qualitative information as part of the baseline description, and ensuring that information is tailored to the scale, type and topic of the LDD under consideration. Our detailed comments below principally relate to Appendix B. As a general comment we welcome the use of a narrative approach rather than endless streams of numeric data. Notwithstanding the useful format of the Appendix, we have a number of concerns regarding the adequacy of the scope and content of the data included for the historic environment.</p> <p>As underlined in our general comments, in establishing the baseline the historic environment should be broadly interpreted encompassing: all designated historic assets; non designated features of local historic interest; the character of the wider landscape and townscape; and the potential for as yet unrecorded archaeological interest.</p>

In Appendix B, paragraphs 20.4 and 20.5 only provide a very simplistic overview of the Boroughs historic resource and fail to draw on and interpret the tabulated data. We recommend that the scope and content of the text is reviewed with input from the Boroughs conservation officer and County Council archaeologist. We also offer the following recommendations on the scope of the data that must be taken into account and collated to help ensure a robust consideration of the Boroughs historic environment resource. As a general and overarching comment, we strongly recommend that the historic environment is dealt with as a separate and distinct topic to landscape. This was a key point made in our comments on the first LDF round, and it is disappointing and of concern that cultural heritage and landscape are again being treated together. It is our view, based on practical experience, that this approach will not provide a robust consideration of either topic and hence the Council is at risk of failing to meeting the requirements of the SEA Directive and indeed reflect a growing body of practice that has developed in recent years. Overall, the preferred terminology of English Heritage is the historic environment and historic assets since these more accurately reflect the broad scope of the historic environment. The data in Appendix B (p82/3) focuses primarily on a limited range of designated historic assets. This fails to adequately reflect the historic environment resource of the Borough and adjoining Districts. For up-to-date information on designated historic assets the 2007 Heritage Counts Report (www.heritagecounts.org.uk) includes a web-based summary of core data sets by local authority area for the West Midlands.

The broad category of archaeological sites is used, but lacks any descriptive interpretation can the list of 1166 entries be broken down into any broad themes. Is it correct that there are no Scheduled Monuments located in the Borough? [*Note also that consideration must be given other nationally important archaeological remains - since not all are scheduled.] Important historic gardens are referenced are these Registered Parks and Gardens (i.e. on the national register)? If so they should be referred to as such, and details given including Grade. Any parks and gardens of local historic interest (e.g. on a local list) should also be noted. For all designated assets, setting issues are also relevant to the baseline.

The designated site data in Heritage Counts must be supplemented by further information on the non-designated historic resource. This is a major omission in the data presented in the draft Scoping Report. We strongly recommend that this is addressed and relevant data given on, for example, local list buildings and other features, local list parks and gardens.

Listed Buildings and proportion at Risk at“ this entry should be updated and reflect the latest position. The 2007

national Buildings at Risk Register was published in the summer with updated figures for Grade I and II* listed buildings (and structural Scheduled Monuments). Grade II listed buildings are not currently monitored under the national register.

However, Grade II buildings form the vast majority of the listed resource, and an up-to-date at risk register for them may be an information gap and should hence be highlighted as part of the baseline (i.e. as a problem/constraint). Any available at risk data for unlisted buildings of local historic / architectural interest should also be used. Comparisons to all previous years BAR Registers (national or local) should be undertaken to inform the trend review. In Table 5.1 in the main report, the limitations of this indicator should be noted i.e. the national register only covers Grade I and II* buildings not the vast majority of the Borough Grade II listed buildings. We comment further on the adequacy of Buildings at Risk as an indicator for the appraisal framework under Section 7. The year English Heritage completed a Scheduled Monuments at Risk survey for the region, the results of which have been made available to the County Councils Historic Environment Record. Preliminary results of the survey are available via the Heritage Counts website (2006 data sheet), but more detailed results for Staffordshire are available and should be highlighted in the baseline.

The potential for as yet unrecorded archaeological interest should also be highlighted. Again this should be highlighted as a problem/constraint under the Conservation areas as with the more detailed approach taken for biodiversity the conservation areas should be listed with an accompanying information on the preparation of appraisals (how up to date) and published management plans (as per the former BVPI). In conjunction with the quantified data on conservation areas and management plans, consideration should also be given to including qualitative data on the condition and or pressures for change that these areas are typically subject to. Discussions with the Boroughs conservation officer should inform this.

The baseline data given in the Appendix issue is predominantly site specific and consideration should also be given to the historic character of landscapes and townscapes beyond the conservation areas already mentioned. It is not easy to represent the historic environment spatially in a holistic way. Point data alone from individual designations do not provide an adequate overview [again this is a relevant problem/constraint which should be highlighted in the baseline summary]. Historic landscape characterisation and urban characterisation can supplement individual site designations, broadening the understanding of the historic environment by describing the evolution of the present day landscape / townscape and identifying its surviving historic character. Through this process, an understanding about what gives a place its distinctive character and sense of place can be gained and provide the basis for

evaluating the sensitivity of the landscape and its capacity for accommodating development and change.

Data is available from the county/unitary Historic Landscape Characterisation projects, Extensive Urban Surveys (about to be commissioned for Staffordshire by the County Council) and other urban characterisation projects. In the case of Staffordshire, the County Council has completed a county wide historic landscape characterisation (HLC) (contact: Debbie Langley) and should be contacted for further information on the availability of data for the Borough area. [This information set has been previously highlighted in our comments on the first LDF Scoping Report, and indeed at our subsequent meeting regarding the recommencement of the LDF process].

Further to the above comment we wish to draw your attention to a piece of work Shropshire County Council is undertaking, part funded by English Heritage, in using the county HLC to determine the sensitivity and capacity of the urban-rural fringe area surrounding Shrewsbury (another growth point local authority) to accommodate new development and identify green infrastructure opportunities. It is envisaged that this project will provide an approach that can be replicated elsewhere to help inform decisions as to the location, scale and planning of development and indeed its appraisal. The project report is due to be completed this year and will be disseminated to all the County leads on HLC.

For monitoring the character of the Boroughs rural landscapes there is the national initiative Countryside Quality Counts, which also provides some measure of the degree of safeguarding or erosion of historic landscape features.

For the Boroughs urban areas and smaller settlements, conservation area appraisals will describe the historic character of these defined areas. Consideration, however, should also be given to the need for further urban characterisation data for townscape areas outside of conservation areas but under potential development pressure (e.g. suburban areas) or likely to be subject to major change. There are a range of approaches to urban characterisation studies as for example extensive and intensive surveys of historical significance developed in the context of areas of low demand housing (a) and rapid assessments for suburban areas (b). [Information on both approaches is available at www.helm.org.uk]. We would be happy to discuss further the application of characterisation approaches in the context of the Boroughs position as an area of significant development under the emerging Phase 2 Regional Spatial Strategy.

Other relevant baseline data sources include - Parkland loss. As part of the national Heritage Counts report in 2005, data is presented on the loss of historic parkland over the period 1918-1995 the results of which are now available by local authority area in the national and regional summaries for the 2006 edition of heritage counts (on the website).

	<p>Traditional farm buildings are typically under represented in statutory listings, but represent a fundamental part of an areas rural heritage and equally subject to a range of development pressures. General baseline data on traditional farm buildings is also available in the 2005 national Heritage Count report relating to their condition and levels of conversion (reported by joint character area). Available via the HELM website http://www.helm.org.uk/server/show/nav.9495</p> <p>a more detailed summary is given for each region by joint character area of their characteristic traditional farm building stock in a series of preliminary regional character statements. Staffordshire County Council, with support from English Heritage, is undertaking a county wide survey of traditional farm buildings which will be completed early in the New Year (contact: Steve Dean, Staffordshire County Council). It is envisaged that this information will be used to help inform the future sustainable management of Countys historic farmsteads.</p> <p>Consideration should also be given to using more qualitative data, as for example resident satisfaction surveys. With respect to the historic environment one of the key indicators of the national Heritage Counts Report is participation in the historic environment, as for example visits to historic sites. In the context of these substantive comments on the baseline data, we strongly recommend that the analysis of the historic environment is reviewed and considered more thoroughly than set out in the draft Report. The recommendations in the following section may help with this in conjunction with discussions with the Councils and County Councils conservation staff.</p>
Change made to Sustainability Appraisal documents	Noted. Documents added to the list of ppp's and looked at as part of the assessment of ppp's in the technical appendices.
Question SA3 - Do you know of any data that is missing or misrepresented in these tables?	
Mr Tim Midgley	Affordable housing; clearly in Stafford is not affordable, according to the Courts the 'so called' affordable housing in the Borough is not as indicated given the numbers of actions against 1st time buyers for repossessions that has increase this year by some 65%. Affordable homes should only be deemed to be so; if the main income multiplied by 3 is the sum that is borrowed, in Stafford no home over £100,000 can be called affordable. Most so called low cost homes are not affordable as several lenders have given 8 to 10 multiples of earnings allowing people to obtain mortgages that they can not sustain the cost of the mortgage with even the smallest rise in interest rates.

Change made to Sustainability Appraisal documents	Noted – no change proposed.
Mr Tim Midgley	Special needs housing; the number of homes required is greater than that stated.
Change made to Sustainability Appraisal documents	Added to list of sustainability issues, previously only referred to affordable housing
Mr Tim Midgley	<p>Homelessness From data gathered over 4 x 3 nights in January 07 and 4 x 3 nights in March 07 4 x 3 nights in June 07 4x 3 nights in Sept 07 and 4 x 3 night in Oct 07 it is our belief that the number of homeless families in Stafford exceeds the number stated.</p> <p>Our research showed that the average homeless families were 410 within the borough in each of the months however Sept and October showed an increase above that for the same period in 2006.</p>
Change made to Sustainability Appraisal documents	Noted. Information put into evidence base folder.
LA21	Could add hectare LNR / population used in the LAA
Change made to Sustainability Appraisal documents	Agreed to add target – awaiting correct figure to put in SA documents from LAA process
The Environment Agency	Around 5 million people, in 2 million properties, live in flood risk areas in England and Wales. The Environment Agency has an important role in warning people about the risk of flooding, and in reducing the likelihood of flooding from rivers and the sea. As such, there should be some baseline information relating to flood risk in the borough to assess current flood risk, and to allow targets to be set.

	<p>The SFRA should be able to supply data which may be able to be used in this table. DEFRA's High Level Target 5 report can also provide information on instances where despite an Environment Agency flood risk objection, planning permission has been granted. This information is broken down into each LPA area, and is already being collated by your Authority. The target for planning permissions where this has occurred should be zero. Data could also indicate the number of developments which incorporate sustainable drainage techniques into the drainage schemes. This may be undertaken as part of your Annual Monitoring Report. Ambitious targets should be set for this, as the use of SuDS in new developments / redevelopments is a proactive way of managing flood risk within the district, and will reduce the risk of both surface water flooding (from the sewer capacity being breached) and flooding from increased flows in rivers.</p> <p>If designed well, SuDS can also have great amenity and biodiversity gains, and do not necessarily have to tie up large areas of sections of land, as can be utilised in the form of green roofs. SuDS are particularly important for your borough, as the catchment is particularly prone to flooding problems, and it is highly likely that new large-scale development within the borough will be focused on greenfield sites (which currently have the lowest run-off rate). The majority of your borough is also of permeable geology, and is of an uncontaminated nature, which is prime for the use of infiltration drainage systems. It is understood that you are considering preparing a Water Cycle Study. It is strongly recommended that such a study forms part of the baseline data for your LDF process, in order to ensure there are sufficient water and sewerage resources and infrastructure for the projected growth over the lifespan of the plan.</p>
Change made to Sustainability Appraisal documents	Information referred to in 2006 – 2007 AMR. Will be taken and put in the baseline presented in the SA Report. Reference to setting ambitious targets for SuDS noted, target is for all new developments to incorporate SuDS.
<p>Question SA4 - Do you think there are any other sustainability issues or opportunities that need to be considered in the development of the plan?</p>	
<p>Advantage West Midlands</p>	<p>AWM welcome the inclusion of the West Midlands Economic Strategy (WMES) in list of relevant plans along and the cross reference to relevant WMES plans & objectives. The WMES 'Connecting to Success' will be launched 10th December along with the Draft Delivery Framework - the Scoping Report should consider relevant provision of the updated WMES. WMRA has produced a sustainability checklist covering regional specific sustainability and planning issues, emphasising those of higher priority and can also be adapted to reflect locally significant concerns.</p>

Change made to Sustainability Appraisal documents	Added to the list of PPP's and examined for technical appendices.
LA21	Add reference to sustainable transport, resource conservation, green belt land (in relation to use of PDL)
Change made to Sustainability Appraisal documents	Noted
Natural England	Climate change and adaptation for it, should be added to the list of sustainability issues and opportunities. As the greatest global, and local environmental issue being faced it needs high and explicit coverage in our view.
Change made to Sustainability Appraisal documents	Added to list of Key Sustainability Issues – Environmental issues
The Environment Agency	<p>In light of the above comments, flood risk in the borough (particularly in Stafford town centre) is a prime environmental issue for your authority. In line with PPS25, the SA should help guide clear policies against developing in the floodplain, and particularly the Functional Floodplain. The Functional Floodplain (i.e. the land with 1 in 20 year probability of flooding) is the land which is required to flood in order to store flood water. Development of land such as this is an increasing problem for your authority, with current developments and redevelopment proposals in the town centre.</p> <p>Please note:- car parking is not considered an appropriate use of Functional Floodplain. Continued development of land such would result in an increase in flood risk to other areas of the town, which are potentially more vulnerable to the effects of flooding. The choice to develop in this land therefore has serious economic impacts, which should not be underestimated. A prime opportunity for Stafford would be the re-naturalisation of areas such as these, by both moving existing development out of this zone, and not granting permission for new development within this zone. These areas should be allowed to flood frequently (as is their natural regime), and can provide many benefits as such areas of land naturally have great biodiversity potential in the form of wetland or semi-wetland habitats. This further links to recreational, amenity and health benefits for the borough, in addition to flood risk and ecological gain.</p>

Change made to Sustainability Appraisal documents	Flood Risk in the Borough (particularly in Stafford town centre) now added as a key social sustainability issue. The results of the SFRA will be referenced in the SA process, when completed.
Stafford Gospel Hall Trust	<p>We support the Sustainability Objectives, including social and community objectives and are surprised that these are not fully reflected in the key social Sustainability Issues and Opportunities. Having due regard to the RSS Phase 2 Preferred Option Policy SR2 we suggest the following additional social Issues and Opportunities:</p> <ul style="list-style-type: none"> • Need to ensure that the spatial requirements of the voluntary sector including faith communities are met in order to support health, education and skills, spiritual, sport and recreation and cultural objectives.
Change made to Sustainability Appraisal documents	Noted
English Heritage	<p>Given that the Scoping Report (Table 6.3) fails to identify any key issues for the historic environment we offer the following advice. Analysis of the baseline information for the historic environment and early consultation with local authority conservation officers and archaeologists who understand local issues and opportunities, and with other key stakeholders and local communities will help identify sustainability issues relating to the historic environment. This underlines the importance of a comprehensive baseline for the historic environment together with LDF community consultation as an effective means of identifying environmental issues and opportunities.</p> <p>Key issues should address opportunities as well as problems in relation to the historic environment. There is a need to understand the wider contribution of the historic environment to sustainable development and not simply view it as a narrow issue focused on preservation. An option that might be considered may be opportunities offered by heritage-led regeneration, heritage based sustainable tourism, place-making, design of new development to fit with the existing, functional layout of the town etc.</p> <p>Environmental problems, issues and opportunities affecting the historic environment, and to be addressed in the SEA/SA process may include:</p> <p><u>Problems</u></p> <p>Heritage assets under threat or at risk from neglect or decay</p> <ul style="list-style-type: none"> • Areas of significantly degraded landscape / townscape • Areas where, on current trends, there is likely to be further significant loss or erosion of landscape/

	<p>townscape character or quality</p> <ul style="list-style-type: none"> • Areas where development has had or is likely to have significant impact (direct and or indirect) upon the historic environment and or peoples enjoyment of it • Areas where landscape character or quality is being eroded because of changing farming or other land management practices • Traffic congestion, air quality, noise pollution and other problems affecting the historic environment • Areas where quality of life, including economic and social well being, is significantly affected by the above environmental problems. Issues • Environmental capacity issues • Preserving and enhancing the designated and non-designated historic environment resource - Conserving the industrial/commercial heritage of the area Opportunities • Using the area's historic environment resource (archaeology, built and industrial heritage) to contribute to local distinctiveness and sense of place and community engagement • Promoting the innovative reuse of the existing building stock. Improving awareness, involvement, and understanding of, and access to, the areas historic environment • Heritage-led regeneration opportunities, heritage based tourism, traditional building skills and the wider environmental economy, • Using the historic environment as an educational resource
Change made to Sustainability Appraisal documents	Noted
Question SA5 - Do you think any of the sustainability issues and opportunities require further explanation?	
English Heritage	<p>Our comments above on the identification of issues and the baseline should also be taken into account given that the headline objectives and any supporting decision-making questions should have been derived in part from these stage. With regard to the proposed sustainability objectives and draft framework we have the following comments: Objectives As already mentioned, we do not support the combined approach for cultural heritage and landscape adopted under objective 15. It is our position that a specific objective for the preservation and enhancement of the historic environment will be always be necessary. We also recognise that it may also be appropriate to address historic environment matters under other objectives such as those covering regeneration, tourism, access to services, quality of life, landscape and townscape. A sustainable outcome is better achieved by integration of this issue at all points of discussion. This position is due to be publicly endorsed as part of a web-based set of advice</p>

and guidance to be launched early next year, but used to inform this response. With regard to the headline objective for the historic environment, the list below presents a selection of objectives which can be tailored to local authority circumstances and the level and subject of the plan under consideration. These are broad objectives, where a plan or document deals with a particular topic the objectives should be more specific. The list is divided into environmental, social and economic groups and includes objectives which may be applicable to other themes such as landscape and townscape.

Environmental Objectives

- To preserve and enhance sites, features, areas and settings of archaeological, historical and cultural heritage importance.
- To protect, enhance and manage the rich diversity of cultural and built environment and archaeological assets.
- To protect, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening local distinctiveness and sense of place.
- To achieve high quality and sustainable design for buildings, spaces and the public realm sensitive to the locality.
- To minimise waste by reducing demolition activities. Given the format of the current set of proposed objectives under the environment theme an appropriate approach for a headline objective for the historic environment could be: to preserve and enhance the historic environment or alternatively either of the first two suggestions. For a landscape / townscape headline objective the third suggestion would be suitable. Other relevant social and economic objectives relating to the historic environment area:

Social Objectives

- To improve and broaden access to, and understanding of, local heritage, historic sites, areas and buildings
 - To provide better opportunities for people to access and understand local heritage and to participate in cultural and leisure activities
 - To identify, assess and incorporate the physical, social, economic and environmental value of the historic environment in the regeneration of (authority/area).
 - To optimise the use of previously developed land, buildings and existing infrastructure
 - To promote heritage based sustainable tourism
- Decision-Making Criteria

The headline objectives proposed in the sustainability appraisal framework are not supported by any more detailed decision-making criteria. In view of the broad nature of the approach used to define the headline objectives, we feel

that this is an omission and it would be useful in later stages of the appraisal process to work up accompanying decision-making criteria. The Government advises that planning authorities may also choose to include more detailed decision-making criteria and related indicators in their SA framework. These detailed decision-making criteria can help to ensure that all the key issues to be considered in the SA are incorporated in the appraisal framework. It is important to include separate decision-making criteria for the historic environment, in order that the identification of likely effects upon the historic environment is not masked.

Government guidance, Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents (ODPM 2005) provides one overarching decision-making criterion that relates to the historic environment. Will it protect and enhance sites, features and areas of historical, archaeological and cultural value in both urban and rural areas? To aid the derivation of more appropriate decision-making criteria we offer the following menu of questions to support environmental, social and economic objectives.

We suggest these are reviewed and tailored to expand on the headline objective and reflect the historic environment resource of the Borough.

Environmental Objectives

- Will it preserve and/or enhance the historic environment or will it protect World Heritage Sites and their setting o will it preserve archaeological remains and their setting
- will it preserve listed buildings and structures and their setting
- will it preserve or enhance the character or appearance of conservation areas and their setting o will it protect Registered Parks and Gardens, Registered Battlefields and their setting o will it conserve locally important buildings and townscapes
- will it conserve distinctive historic landscapes o will it contribute to the better management of heritage assets
- Will it improve the quality of the historic environment
- Will it lead to the improved management and or restoration of a historic asset
- Will it respect, maintain and strengthen local distinctiveness and sense of place
- Will it promote high quality urban design
- Will it provide for increased access to the historic environment Social Objectives
- Will it increase the social benefit (e.g. education, participation, citizenship, health and well-being) derived from the historic environment
- Will it improve the satisfaction of people with their neighbourhoods as places to live
- Will it engage communities in identifying culturally important features and areas

- Will it provide for increased understanding of the historic environment Economic Objectives - Will it increase the economic benefit (e.g. heritage led regeneration, tourism, environmental economy, cultural economy) derived from the historic environment
- Will it promote the environmental economy
- Will it promote heritage-led regeneration
- Will it lead to the repair and restoration of an historic asset
- Will it make the best use of existing buildings and physical infrastructure
- Will it promote heritage based sustainable tourism
- Will it ensure that restoration and repair and maintenance is sympathetic towards the local environment
- Will it support the repair and reuse of historic buildings
- Will the initiative help to reduce the number of vacant buildings through adaptive re-use.

Indicators

The selection of indicators for the historic environment may vary at different stages of the appraisal process and in relation to the particular LDD. State of the environment or contextual indicators can inform the baseline analysis, such as looking at the comparative range, quality and condition of historic assets and identifying possible targets. However, state of the environment indicators may not always be suitable for the appraisal or monitoring the significant effects of a plan. At these stages the priority should be devising indicators which will clearly demonstrate the impact(s) of the plan on the historic environment. Selecting indicators which are directly linked to SEA/SA objectives is a complex process and with respect to the historic environment further exacerbated by the relative lack of consistently monitored data when compared to other topic areas.

Notwithstanding this a robust monitoring framework for the historic environment must be included to meet the requirements of SEA/SA in terms of:

- Identifying any unforeseen adverse effects of implementing the plan and enabling appropriate remedial action to be taken.
- Testing the accuracy of predictions made in the SA and improving future practice.
- Checking the delivery and performance of mitigation measures.
- Determining whether the plan is contributing to the achievement of the objectives and targets for the historic environment.

Collecting information for future LDDs.

In devising historic environment indicators for the appraisal or monitoring of the significant effects of a LDD English Heritage recommends that:

- the indicators relate to the accompanying objectives/sub-objectives (decision-making criteria); · the indicators are appropriate and relevant to the level and subject of the plan under consideration;
- the indicators address positive and negative effects;
- use is made of both qualitative and quantitative data;
- the indicators are kept under review as new data sets become available and or new issues are identified;
- accompanying targets are included. In the proposed sustainability appraisal framework two indicators (with accompanying targets) are identified.

The general thrust of the first (number of developments that adversely affect historic character) is welcomed, but we have concerns over how this is to be monitored in a robust way in view of the potential subjectivity involved in determining the adverse impact and the affect on historic character.

The indicator is not detailed in Appendix 3 and should be with further explanation of its monitoring requirements. A possible alternative approach could be Area of highly sensitive historic landscape characterisation type which has been altered and their character eroded this based on the use of the HLC, but dependent on a sensitivity/capacity type study. The second indicator relies on the number and area (? this is not relevant) of buildings at Risk (although the Appendix refers to Number/% of Listed Buildings and Scheduled Ancient Monuments at Risk). The discrepancies between the main report and Appendix should be clarified. As already mentioned, the National Register collated by English Heritage only covers Grade I and II* listed buildings (and structural Scheduled Monuments). If an at risk indicator is to be used, it should cover all the listed building resource (i.e. also Grade II) and ideally also include local list buildings at risk (this potentially a data gap requiring the setting up of a local list and accompanying at risk survey).

The existing survey data for Scheduled Monuments at Risk should also be included to reflect the national launch next year of the heritage at risk programme (encompassing a broader range of designated historic assets listed buildings, schedule monuments, designed landscapes, marine wrecks, places of worship). We also note that no positive effect indicators are proposed.

Further to the above comments outlined below is a selection of indicators which could be tailored to the headline objective and decision-making criteria.

	<ul style="list-style-type: none"> • Number and % of Listed Buildings at Risk (all grades) • Number and % of Scheduled Monuments at Risk • Change in the character or appearance of conservation areas • Number and % of locally listed buildings at risk · Number of historic buildings restored and brought back into use • % of local authority area covered by historic landscape / urban characterisation studies · Improvements in the management of historic and archaeological sites and features • % of Joint Character Areas showing no change or showing change consistent with character area descriptions • % of planning applications for which archaeological investigations were required prior to approval
Change made to Sustainability Appraisal documents	<p>Stronger reference made in the technical appendices to the historic environment, in particular work done by Staffordshire County Council; historic landscape characterisation and landscape assessment.</p> <p>'and area' taken out of the indicator referring to number of listed buildings at risk and reference to scheduled ancient monuments at risk also added (so that the indicator in the document and technical appendices is consistent).</p> <p>The suggested indicators 'Number of historic buildings restored and brought back into use' and '% of Borough covered by historic landscape / urban characterisation studies' added.</p>
Question SA6 - Do you agree with the targets and indicators?	
LA21	Targets 'to reduce' or 'to increase' seem a bit vague
Change made to Sustainability Appraisal documents	Agreed. Targets and indicators amended as a result of other comments and recommendations from Natural England.

<p>Natural England</p>	<p>We support Sustainability Objective 12 and welcome in general the suggested indicators and targets. However the first indicator is too general in our view as every development will in some way or other affect species or habitats. The key consideration having regard for PPS 9 is 'The Number of Developments that may affect features of biodiversity conservation value (includes not exclusively habitats and species of importance in the borough, BAP Species and habitats, legally protected species, veteran trees, ancient woodland, Sites of Biological Importance) Recommended target: Reduce to minimum. Consideration should be given to the inclusion of an indicator relating to sites of geological conservation value in line with the guidance in PPS 9. The last indicator i.e. Number of the developments that protect and enhance sites and spaces important for biodiversity etc has no associated target included. We suggest the target should be to: 'increase'. We welcome and support SO 15 and the inclusion of accessible natural greenspace targets.</p>
<p>Change made to Sustainability Appraisal documents</p>	<p>The following indicator and target have been added</p> <p><i>Number of developments that may affect biodiversity conservation value</i> Target: Reduce to minimum.</p> <p><i>Number of developments that may affect features of geological conservation value</i> Target: Reduce to minimum</p>
<p>Environment Agency</p>	<p>Sustainability Objective 5: It should be noted that water-saving techniques and sustainable drainage systems are linked, but are also two different subjects and perhaps should be treated as such. The use of water-saving techniques within the development does not negate the need for sustainable drainage systems to deal with rainwater on site, as water-saving techniques largely deal with the issue of managed water resources and sustainable drainage deals with the issue of minimising flood risk. As such, the target should be for both requirements to be incorporated into new developments, and should read as follows:</p> <p><i>Target: All new developments to incorporate water saving measures and sustainable drainage techniques.</i> It is considered that the second target under this objective should only refer to flood risk and not to risk of</p>

groundwater pollution.

Flood risk and groundwater pollution are two separate issues and only flood risk is mentioned in the wording of the objective. Groundwater contamination is also not linked to climate change, so may be more appropriate under another objective.

It should also be noted that this target is highly unlikely to be achieved given the existing development that lies within areas liable to flooding and major aquifers within the borough. In addition to separating out the issues within this target, you may wish to reword this to allow for a certain amount of such development, in the spirit of PPS25 (sequential test etc). An alternative target may read as follows: *Target: No planning permissions in the floodplain to be granted contrary to Environment Agency advice. We do however recognise the value in setting ambitious targets which can act as an incentive throughout the plans lifespan, and would support you if you wished to push for tougher standards on flood risk within your borough than the existing national policy. With regards to the number of potentially contaminative developments located on major aquifers vulnerable to contamination, we suggest a variation on the above target which puts the onus on the Environment Agency to assess the relative risk of the development to groundwater quality, as it may require scientific assessment to ascertain if the risk is acceptable or not.*

In light of this, the following wording may be appropriate: *Target: No planning permissions to be granted contrary to the Environment Agency's advice based on the risk of contamination to underlying groundwater.*

This target could be included in either Objective 13 and/or Objective 14 if either were amended to refer to the protection of groundwater quality or Controlled waters (Controlled Waters are defined as: relevant territorial waters, coastal waters, inland waters, and ground waters controlled by the Environment Agency as described in the Water Resources Act 1991).

It is welcomed that the dual aspects of climate change are addressed within separate objectives both to reduce developments vulnerability to impacts of climate change (Objective 5) and to reduce societal contributions to climate change (Objective 11). The inclusion of flood risk and climate change issues within the economic objectives is welcomed, as the link between environmental factors and economics are not always readily acknowledged and catered for. Sustainability Objective 9: The Environment Agency welcomes the inclusion of targets relating the reduction of noise and light pollution, as this can have detrimental impacts on the ecology of the area. Sustainability Objective 10: The Environment Agency is promoting the opening up of watercourses for recreation

purposes, and encourages developments which face onto watercourses, making them a shared public space which will therefore be appreciated and cared for by the community. This will link with the reduction of pollution, improvement in water quality, enhancement of biodiversity in addition to social factors such as safety and health benefits. All new development adjacent to watercourses or open water bodies should encourage accessibility through the development to the watercourse, in order to encourage its use. It is therefore suggested a relevant target is incorporated under this objective regarding the number of waterside developments which improve accessibility and quality of the water environment. This is similar to the target relating to the creation and enhancement of open space, but it is noted that it may not be covered under the Open Space Strategy.

Sustainability

Objective 11: The Environment Agency welcomes this objective, as it focuses clearly on climate change and what the borough can do to minimise it. Although this partly falls within our remit, however, we are unable to provide baseline data relating to the targets. We recommend that based on current figures, ambitious quantitative targets are set in order to achieve a significant improvement.

Sustainability Target 12: We welcome the inclusion of the protect and enhance theme, as promoted within PPS1 and PP9, and particularly welcome the target relating to Staffordshire BAP, as it should cover all issues within our water-based remit.

Sustainability Target 13: You may wish to incorporate the pollution aspect of Objective 5 into this objective.

Sustainability Objective 14: This objective requires clarification:- To protect and enhance water quality of the Boroughs rivers, whilst maximising their carrying capacity and achieving sustainable water resource management It should be noted that any objectives, policies or proposals that encourage maximising of rivers carrying capacity through the process or dredging would be strongly opposed on ecological grounds, as it causes severe detrimental effects on water-based habitats and its associated species (and is also in direct conflict with Objective 12). It is assumed however that this objective is just mis-worded, and does not allude to dredging, but to the reduction of surface run-off rates through the use of SuDS, as detailed on page 32.

This Objective should therefore be amended to reflect this. With regards to the targets the Environment Agency's comments are as follows:

Please note the Environment Agency is unable to provide information relating to the water consumption of any

	<p>individual development, so unless this data is available from an alternative source this target may not be viable. It may also be difficult to attribute specific pollution events with a particular development; however the Environment Agency will have information regarding successful pollution prosecutions and enforcement action that may be able to be fed into your SA monitoring framework, although it will not be specifically related to new developments. Chemical and biological water quality data is available from the Environment Agency, and in line with the EU Water Framework Directives (WFD) requirements, should always show an improvement in quality. Historic changes in water quality would provide an indication of ambitious but achievable targets for improvement which could be used throughout the plans lifespan.</p> <p>For the final two targets under this objective, please see comments relating to Sustainability Objective 5.</p> <p>With regards to the Monitoring Table in Technical Appendix 3, it is commented that targets set should be ambitious, and calculated as a result of any historic monitoring information which may be available. If no information is available, targets should be set higher rather than lower in order to encourage improvement. It is noted that a number of targets within this appendix only consider action to be taken if there is a severe decline, or only if no developments exhibit the features required. This should be amended to ensure that reasonable improvements are achieved during each monitoring period, and if they are not, corrective action is taken. It is noted that this approach has also been taken with the % of river with good biological/chemical records, which states that action will only be taken if there is a significant decline in water quality. This is particularly unacceptable given the requirements of the WFD as addressed above. Finally, it is acknowledged that the SFRA for this borough is not yet complete, however the next draft of the SA should include clear reference to the completed SFRA undertaken for the borough, and demonstrate how the SFRA's conclusions have been taken into account when considering the Core Strategy, Development Control Policies and Site Allocations (in addition to other relevant SPDs). The SA should provide a transparency to the thought-process behind the DPD or SPD, and clearly show how the SFRA has influenced the LDF documents it is appraising, particularly in terms of the sequential test as required by PPS25.</p>
<p>Change made to Sustainability Appraisal documents</p>	<p>The following target added to the objectives, indicators and targets table</p> <p>Target: All new developments to incorporate water saving measures and sustainable drainage techniques.</p> <p>Contaminated land target moved to SO14 set of indicators.</p> <p><i>Target: No planning permissions to be granted contrary to the Environment Agency's advice based on the risk of contamination to underlying groundwater.</i> Added to SO13 and SO14 set of targets and indicators</p>

	<p>The monitoring of SO14 as listed in the monitoring table also amended to read 'no reasonable improvements achieved in plan period'.</p> <p>The results of the SFRA will be referenced in the SA process, when completed, and will be used when appraising more detailed site / location options.</p>
Stafford Gospel Hall Trust	<p>Yes, we especially support indicator 19 but suggest that the target should be 'Increase'. Social cohesion is difficult to measure, but participation in voluntary/community organisations is often taken as a proxy indicator for social cohesion as well as general 'well-being' of the community. We also support objectives/indicators 6, 7, 8, 10, 16 and 17. We submit that these are closely linked. The Home Office Strategic Plan highlights the linkages to the voluntary, community and faith sectors in order to support objectives 8 and 17. These indicators and positive outcomes are hall-marks of a truly sustainable community.</p>
Change made to Sustainability Appraisal documents	Noted. Target amended to 'increase'
Question SA7 - Do you think any other targets and indicators should be included?	
LA21	Local Nature Reserve's could go in.
Change made to Sustainability Appraisal documents	Indicator from Staffordshire Local Area Agreement included under Objective 12
Natural England	<p>SO 11, regarding climate change - given the overwhelming scientific evidence regarding climate change and its predicted effects, consideration should be given to much more challenging targets and indicators. These should be quantitative to be meaningful. Vague aspirations to reduce the % of people travelling to work by private car are unlikely to be effective.</p>

Change made to Sustainability Appraisal documents	Target to reduce % of people travelling to work by private car taken out and replaced with indicator relating to proportion of energy supply secured from renewable sources – this is often referred to as ‘The Merton Rule’ and the Core Strategy should include relevant policy.
Section 11	
English Heritage	<p>For the next stage of the appraisal process we strongly urge the Council to avoid the over use of tabulated data without any textual analysis and supporting comments. Clear and understandable referencing to the respective sustainability appraisal objective and options should also be ensured (not simply numbering or lettering). We also offer the following general advice on impact identification and predication, significance, evaluation, and mitigation.</p> <p>Potential significant effects Identification and prediction of potential significant effects (positive and negative) on the historic environment can involve the following general categories:</p> <ul style="list-style-type: none"> • Loss or damage to any historic asset and/or its setting; • Conservation and enhancement/ management of any historic asset; • Loss of or erosion of the historic character of the landscape/townscape; • Impact on at risk status of assets, as well as wider level of risk to the historic environment; - Impacts in the wider area, such as trans-boundary effects (e.g. traffic generation, setting issues); • Cumulative impacts on historic assets and places. Cumulative impacts can occur in three different ways, although these are not mutually exclusive: Spatial - accumulation of impacts in different places; Temporal - accumulation of impacts at one location over time; o Simultaneous - accumulation of impacts at one location simultaneously. Significance of impacts When assessing the significance of impacts on the historic environment (and the monitoring of significant effects), including within this architectural and historic townscape and landscape quality, the factors below should be considered. <p>Given the strategic nature of SEA/SA these are suggested to stimulate discussion rather than setting requirements for rigorous assessment.</p> <ul style="list-style-type: none"> • The rarity of historic assets and identified baseline trends; • The historic environment is an irreplaceable and finite resource and hence, impacts are unlikely to be reversible. • The critical importance of a thorough understanding of the historic environment and a robust baseline so that significant adverse impacts can be avoided or reduced and potential benefits maximised; • The inextricable link between the historic and natural environment and the character of the landscape;

- The potential for cumulative impacts: When considering impacts on the historic environment, care must be taken before concluding that impacts on individual heritage sites are not strategically significant. This is because: individual sites can have regional or national significance through scarcity or associations with similar assets, e.g. a particular building type or earthwork, ridge and furrow;
- cumulative minor impacts on a range of individual sites can become significant; o the effect of small impacts, or loss of features, which are not significant individually may become significant, e.g. loss of character of a conservation area. The accumulation of effects on different environmental assets also need to be considered e.g. the impact on historic assets and on related natural and landscape assets.
- Evaluation The planning process frequently involves complex decisions when evaluating the implications of significant effects. The following principles which are of relevance to the historic environment, as well as other aspects of the environment, are useful when evaluating the impact of different options:
- Choices between conflicting environmental objectives must be justified with priority given to highest quality environmental resource. The precautionary principle may be needed;
- While reconciling socio-economic and environmental objectives is key to plan-making, it should be evident that the best environmental option has been selected unless a clear and well justified reason is provided. Balancing should be restricted to slight or exceptionally moderate impacts;
- Where a chosen option could have significant environmental effects, it should be rigorously tested in comparison with less environmentally harmful options.

Recommendations and Mitigation Based on the assessment of significant effects and evaluation of options, the Environmental Report should include recommendations where necessary for modifications to the plan and explain the choice of options. Where the avoidance of harm is not possible, mitigation measures should be identified, appropriate to the level and type of plan being appraised. The primary objective should be the avoidance of harm, with the highest level of protection being afforded to internationally and nationally important historic assets. Damage to other historic assets should be avoided wherever possible, in recognition that such assets are irreplaceable.

Unavoidable damage should be minimised and mitigation measures identified for implementation when development proposals come forward. Compensation measures are not usually appropriate, as historic assets cannot be re-created. Consideration should also be given to including mitigation measures for improving beneficial effects for the historic environment. When presenting the results of the assessment in the Environmental Report, seek to avoid generalised statements such as this option could have adverse impacts on historic assets, although it is recognised that it may not be possible to be too specific at the higher strategic level, e.g. RSS. However, even at this level, we

	expect the report to identify the nature and extent of direct or indirect adverse impacts, e.g. with respect to specific geographical locations/ sub-areas; the asset type or time-related effects.
Change made to Sustainability Appraisal documents	Noted - information will be used when appraising more detailed locations and sites against the SA framework.
Section 13	
LA21	Nice photos, but why are they here, and if they are to stay, why exclude other images / nice pictures?
Change made to Sustainability Appraisal documents	Noted. The photos relate to Natura 2000 sites in the Borough (section related to Habitats Regulations Assessment) Other images will be used where necessary.