

# Strategic Policy Choices: Sustainability Appraisal



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## Non-technical summary

# Non-technical summary

### What is the Local Plan?

A local plan sets out planning policies in a local authority area. These are very important when deciding planning applications. Independent planning inspectors must look at all local plan documents that local authorities in England prepare for an examination. The examination is the last stage of the process for producing a local plan. The process should have fully involved everyone who has an interest in the document and they should have had the chance to comment.

Local plans must be positively prepared, justified, effective and consistent with national policy in accordance with section 20 of the Planning and Compulsory Purchase Act 2004 and the National Planning Policy Framework. This SA relates to The Plan for Stafford Borough which is the first local plan document. A second document setting out allocations will be produced once the plan is adopted

### What is Sustainability Appraisal?

Sustainability Appraisal (SA) is a process of making decisions which balance economic, social and environmental factors for positive benefit. Sustainability doesn't have to be difficult to understand. It is about treating the earth as if we intended to stay and making sure that future generations inherit the earth in a good state.

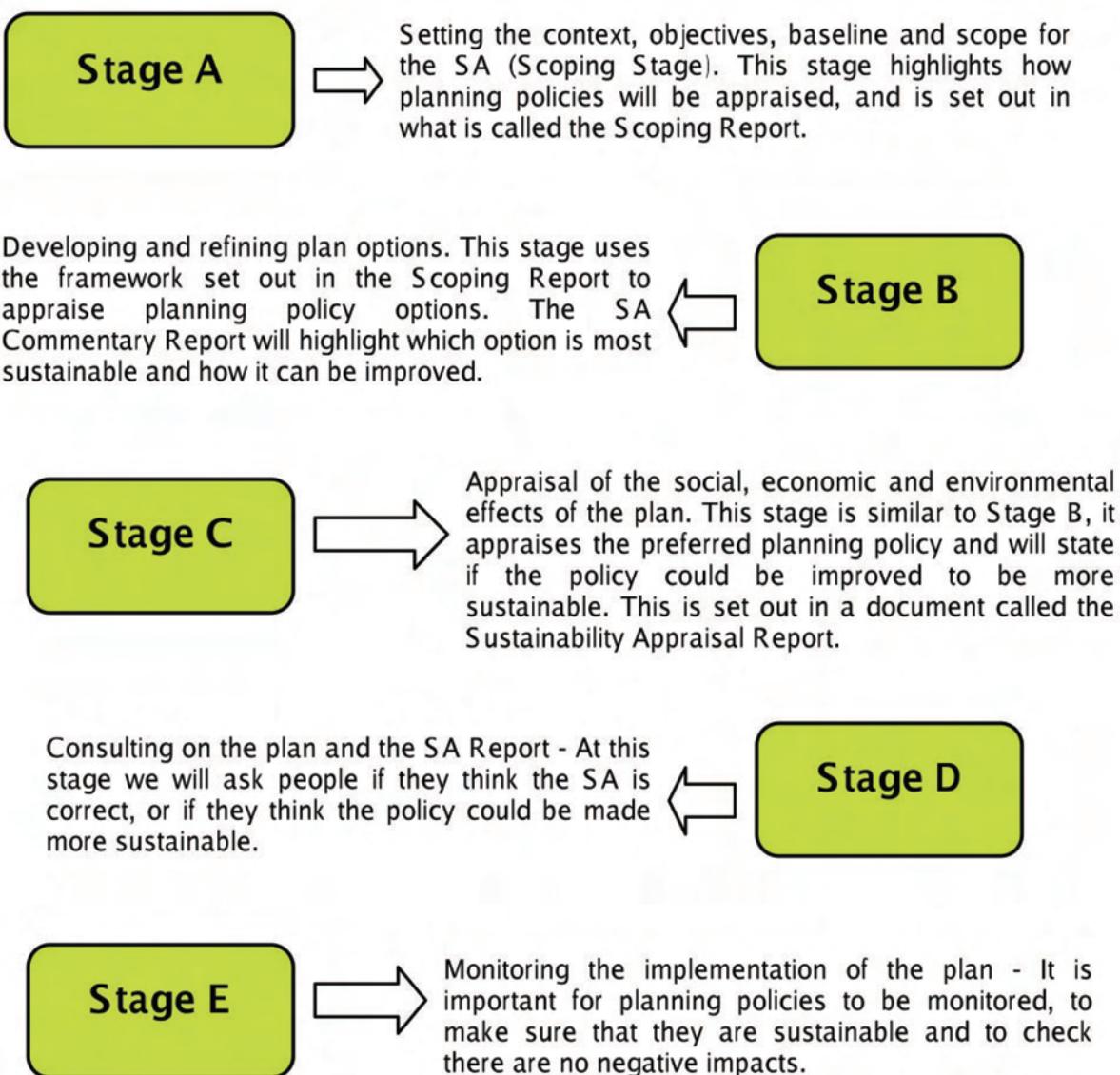
### What is the Sustainability Appraisal Framework?

The Sustainability Appraisal framework is what will be used to appraise planning policies and strategies. The framework is made up of objectives, indicators and targets tailored to the key sustainability issues for Stafford Borough. Planning policies are looked at under these targets and indicators in order to understand how they will contribute towards the sustainable development of the Borough.

### What are the main stages of Sustainability Appraisal?

There are 5 stages to the SA process. This report covers Stage B.

## Non-technical summary



### Summary of findings

This SA of the Strategic Policy Choices appraises the following 10 policy choices:

1. Provision at 500 new houses and 8 hectares of employment land per year
2. Reducing provision, for example to 250 new houses and 4 hectares of new employment land per year
3. Increasing provision, for example to 750 new houses and 12 hectares of employment per year
4. New development focused on the County Town of Stafford only
5. New development focused on the County Town of Stafford, the market town of Stone and either one or more of the key service villages
6. 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
7. A policy of 30% across all areas of the Borough for affordable housing
8. Area specific affordable housing targets based on the evidence contained in the affordable housing viability assessment
9. Establishing a criteria based policy to guide where new development could take place
10. 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

## Non-technical summary

Potential positive impacts can be seen across all sustainability objectives, including delivery of housing, employment land and meeting community needs. There are several uncertain and negative effects in most options due to pressure on the environment and infrastructure and increased contributions to climate change from increased development. It should be recognised that the appraisal in this document does not look at detailed policies and so many of the negative or uncertain effects can be overcome through appropriate wording such as considering landscape, biodiversity impacts or requiring a certain standard of development within a policy which would be used to assess planning applications.

The SA considers that the identified settlements of Stafford, Stone and key service villages and other identified settlements are appropriate as part of the development strategy along with the level of development of 500 dwellings per year and 8 hectares per year. The SA concludes, for the delivery of affordable housing, a flexible approach which applies different thresholds is more appropriate as this would allow for a higher level of delivery in those areas which are more viable. The SA recommends that a basis of 30% is used unless independent studies show a higher proportion is viable in which case this should be required in those areas.

The SA considers that a combination of a criteria based policy as well as establishing development boundaries would be the most appropriate option.

### **How has SA influenced the plan?**

Sustainability Appraisal has played an integral role in shaping the Plan for Stafford Borough. SA has assisted with the identification of sustainable options, taking into account the likely social, environmental and economic effects of implementing the different strategic alternatives. The process has helped to illustrate how policies and objectives could be made more sustainable and flagged up issues relating to specific locations early in the planning process. Below is a summary of how SA has shaped the Plan:

Sustainability Appraisal Scoping Report	Set out how policies will be appraised, set out baseline data and drew out key economic, social and environmental issues for the Borough
Sustainability Appraisal Commentary Volume 1	Appraised 6 broad development strategies providing recommendations and comparing the options to a 'business as usual' approach.
Sustainability Appraisal Commentary Volume 2	This document appraised the plan objectives and specific location options for future development.
Sustainability Appraisal Report	This report appraised the draft core policies, draft development management policies, locations for strategic allocations and the development strategy

### **How can I get involved?**

You can get involved in the Sustainability Appraisal stages. In particular we are seeking comments on the following:

- Key Sustainability Issues
- Sustainability Appraisal Framework
- Sustainability Appraisal Objectives
- Appraisal of development strategy options and suggesting any other development options that should be considered
- Recommendations for policy

If you would like to make any comments, view any of the SA documents or require any further information please contact [nperry@staffordbc.gov.uk](mailto:nperry@staffordbc.gov.uk) or call 01785 619591

### **Next Steps**

The results of this report along with the results from public consultation, will be fed back into production of 'The Plan for Stafford Borough Publication'. The Publication stage of the plan will set out the final approach to the core policies, the development strategy, development management policies and the strategic locations for growth. The Publication document will be appraised before being submitted to the Secretary of State and considered in an examination.

# 1 Introduction

## 1 Introduction

**1.1** The purpose of a Sustainability Appraisal (SA) is to promote sustainable development by embedding principles of sustainable development within policies and plans. Sustainable development is generally considered as development which meets the needs of the present without compromising the ability of future generations to meet their own needs.

**1.2** To be effective, Sustainability Appraisal must be fully integrated into the plan-making process. The SA appraises each stage of the development plan's production and audits key policy decisions. Sustainability Appraisal will monitor the effectiveness of the plan during its implementation in order to inform future revisions.

**1.3** The requirement to undertake a sustainability appraisal, which in this instance also incorporates the Strategic Environmental Assessment, arises from both Government guidance and from a European Union Directive.

**1.4** This document accompanies The Plan for Stafford Borough - Strategic Policy Choices for consultation and demonstrates how the requirements of the Government guidance and the European Union Directive have been taken into consideration. Whilst a Strategic Environmental Assessment and a Sustainability Appraisal are two separate requirements, they are referred to as SA for the remainder of this document.

**1.5** The objective of the Strategic Environmental Assessment (SEA) Directive is:

"to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans . . . with a view to promoting sustainable development".<sup>(1)</sup>

**1.6** The full title of the European Community Directive is 'Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effect of certain plans and programmes on the environment'. However for the sake of brevity, this SA report will refer to the Directive as the SEA Directive.

**1.7** The objectives of the Strategic Environmental Assessment (SEA) Directive are:

- Identifying strategic alternatives;
- Collecting baseline environmental information;
- More thorough prediction of significant environmental effects;
- Greater consultation with the public and statutory environmental agencies;
- Addressing and monitoring the significant environmental effects of the plan.

**1.8** The SEA Directive defines environmental assessment as a procedure comprising of:

- Preparing an environmental report on likely significant effects;
- Preparing an environmental report on the likely significant effects of the draft plan;
- Carrying out consultation on the draft plan and the accompanying environmental report;
- Taking into account the environmental report and the results of consultation in decision making; and
- Providing information when the plan is adopted and showing how the results of the SEA have been taken into account.

**1.9** The main difference between Strategic Environmental Assessment (SEA) and Sustainability Appraisal (SA) is that SEA is focused primarily on environmental effects, whilst SA incorporates the requirements of the SEA Directive and goes further by examining the social and economic impacts of the plan. Therefore the SA process fully complies with the European Parliament's SEA Directive and the SEA Regulations prepared by the British Government.

**1.10** Quality assurance is an important element of the appraisal process. Quality assurance helps to ensure that the SEA requirements are met, it highlights any issues whilst carrying out the Sustainability Appraisal, and it shows how effectively the appraisal has integrated sustainability considerations into The Plan for Stafford Borough Development Plan process.

**1.11** The Environmental Report is a key requirement of the SEA Directive. The Environmental Report documents the whole SEA process and provides a record of how environmental considerations are incorporated into production of the Plan. The following table will be completed in the revised SA Report which will accompany The Plan for Stafford Borough-Publication.

# Introduction 1

## Environmental Report: Compliance with the requirements of the SEA Directive

Requirements of the SEA Directive	Where met in the Sustainability Report
Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated. The information to be given is (Art. 5 and Annex 1):	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes.	
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	
c) The environmental characteristics of areas likely to be significantly affected.	
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.	
e) The environmental protection objectives established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation.	
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects).	
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.	
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.	
i) A description of measures envisaged concerning monitoring in accordance with Art. 10.	
j) A non-technical summary of the information provided under the above headings.	
The report shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (Art. 5.2).	
Consultation:	
authorities with environmental responsibility, when deciding on the scope and level of detail of the information which must be included in the environmental/sustainability appraisal report (Art. 5.4)	
authorities with environmental, social or economic responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental / sustainability appraisal report before the adoption of the plan or programme (Art. 6.1, 6.2)	
other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Art. 7).	
Taking the environmental/ sustainability appraisal report and the results of the consultations into account in decision-making (Art. 8)	
When the plan or programme is adopted, the public and any countries consulted under Art.7 must be informed and the following made available to those so informed:	
<ul style="list-style-type: none"> <li>• the plan or programme as adopted</li> <li>• a statement summarising how environmental, social and economic considerations have been integrated into the plan or programme and how the environmental/sustainability appraisal report of Article 5, the opinions expressed pursuant to Article 6 and the results of consultations entered into pursuant to Art. 7 have been taken into account in accordance with Art. 8, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and</li> </ul>	

## 1 Introduction

Requirements of the SEA Directive	Where met in the Sustainability Report
• the measures decided concerning monitoring (Art. 9)	
Monitoring of the significant environmental, social and economic effects of the plan's or programme's implementation (Art. 10)	
Quality assurance: environmental/sustainability appraisal reports should be of a sufficient standard to meet the requirements of the SEA Directive	

## Sustainability Appraisal and the Local Plan process 2

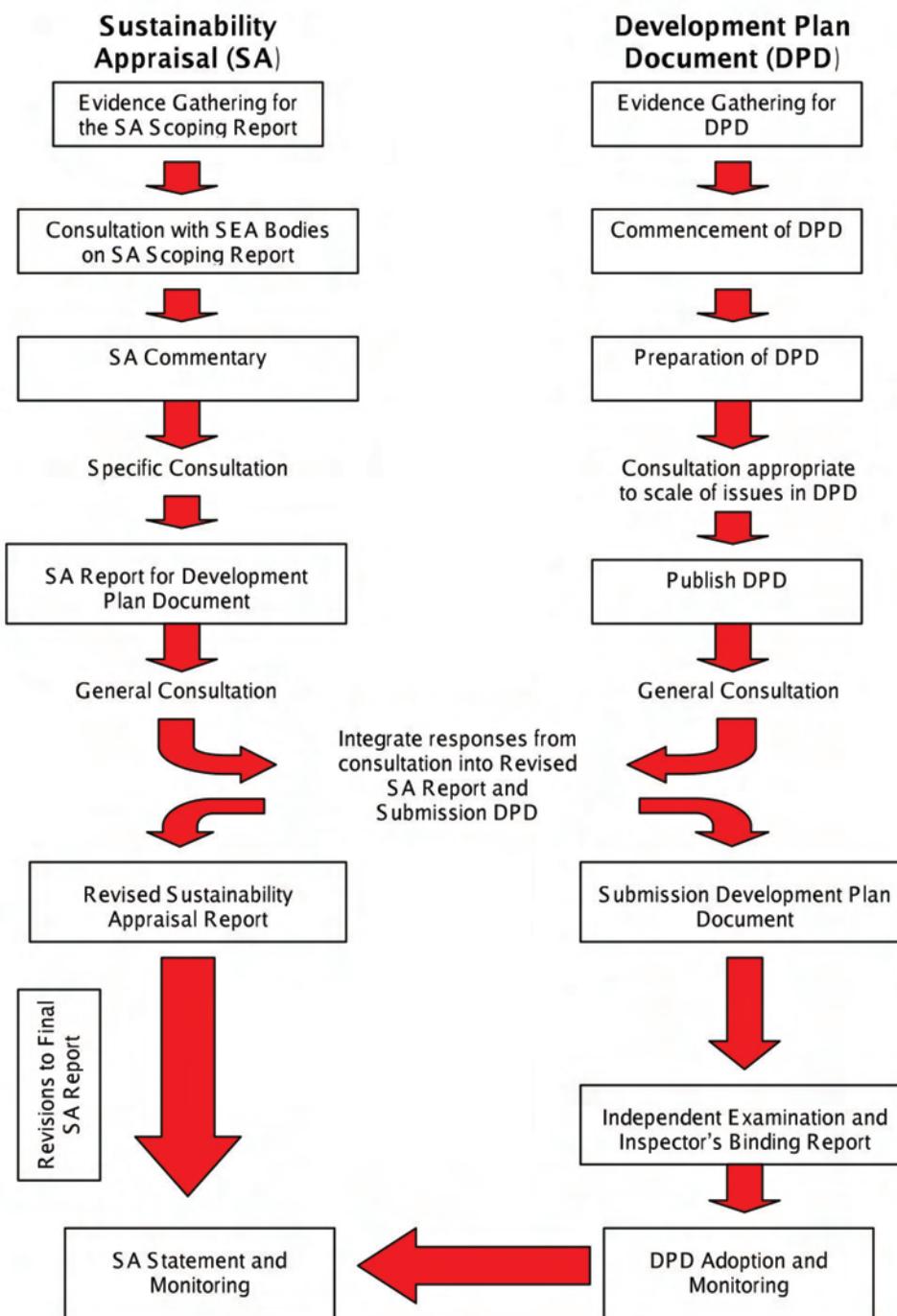
### **2 Sustainability Appraisal and the Local Plan process**

**2.1** It has been normal practice for those preparing and commenting on development plans to consider their likely environmental effects. Therefore the principle of assessing the environmental consequences of plans is not new. However what the SEA Directive and SA process require is the use of an explicit and systematic method to comprehensively and impartially identify and assess the environmental consequences of the development plan.

**2.2** The method for completing a SA on a Development Plan Document (DPD) involves the process outlined below. Although the approach is presented as a sequence relevant objectives, policies and proposals may be re-examined in light of the information gathered through the SA process and in associated consultations. The consultation and submission of both the Revised Sustainability Appraisal Report and The Plan for Stafford Borough Publication will take place at the same time.

## 2 Sustainability Appraisal and the Local Plan process

### Sustainability Appraisal and the Development Plan process



# Sustainability Appraisal and the Local Plan process 2

**2.3** The Government has designated the Environment Agency, Natural England and English Heritage as 'authorities with environmental responsibilities' through the Environmental Assessment of Plans and Programmes Regulations 2004. These agencies must be consulted by plan making authorities in England on the content of each Sustainability Appraisal stage setting out the process undertaken and SEA requirements. Other agencies will also be consulted to provide feedback on aspects of the SA Report.

## **2.1 Scoping Report**

**2.4** The Sustainability Appraisal Scoping Report was published for consultation in October 2007.

**2.5** The document explained the purpose of SA, set out the stages of SA, established the baseline data and outlined the SA framework that will be used to inform the SA of Development Plan Documents.

**2.6** Some minor amendments were made to the content of the SA process in light of comments submitted. In particular the following changes were made:

- Additional baseline data
- Rewording of sustainability indicators and targets
- Considering additional plans, policies and programmes

## **2.2 Developing the Plan Options**

### **2.2.1 SA Commentary Volume 1**

**2.7** The SA Commentary Volume 1 appraised the following 6 broad development strategy options:

- 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

**2.8** In addition a 'business as usual' approach was also appraised. Overall options 3 and 4 were identified as being the most sustainable choices for the development strategy, due to the sustainability of Stafford, Stone and the Principal Settlements.

**2.9** Recommendations included considering other settlements that were deemed as being sustainable in terms of services and facilities as part of the development strategy and the following policy recommendations:

- Housing type and tenure, including affordable housing and sustainable housing design
- Environmental protection and enhancement, including mitigation measures and green infrastructure
- Renewable Energy
- Employment provision
- Infrastructure including transport, water resources and community services and facilities

**2.10** Consultation took place on the SA Commentary Volume 1 in January and February 2008 with a total of 8 comments received. These comments made reference to the appraisal of the broad development strategy options, in particular the SA framework. As a result of these comments the following changes were then incorporated into the sustainability appraisal process:

- Introduction of detailed decision making criteria alongside sustainability objectives, indicators and targets, in order to better illustrate how options are appraised and to provide a more detailed appraisal of each plan or policy option
- Updated baseline information and the addition of waste and recycling information to the technical appendices
- New and amended indicators and targets
- Inclusion of other plans and policies to be considered in the SA framework

## 2 Sustainability Appraisal and the Local Plan process

### 2.2.2 SA Commentary Volume 2

**2.11** The Sustainability Appraisal Commentary Volume 2 appraised broad location options set out in 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
- Haughton
- Woodseaves
- Tittensor
- Yarnfield
- Ladfordfields Industrial Estate
- Raleigh Hall Industrial Estate
- Hixon Airfield Industrial Estate

**2.12** The SA Commentary Volume 2 suggested the following amended plan objectives:

#### Stafford

1. An additional 7,000 new high quality homes will be provided by 2026 to create new communities supported by district centres, three new health centres including GP surgeries, new primary schools in housing developments of more than 1,000 homes and mitigation against any adverse impacts

2. An additional 90 hectares of premium employment land that mitigates against any adverse impacts, will be made available for new research and development facilities as well as growth opportunities to provide new businesses for graduates

#### Stone

1. Provide additional new high quality homes that mitigate against any adverse impacts and support the sustainable community without undermining urban regeneration initiatives in the North Staffordshire conurbation. Provide an additional 20 hectares of new high quality employment land which mitigates against any adverse impacts to provide further support and opportunities for expansion to new and existing employers at Stone Business Park

#### Selected rural settlements

1. Provide for high quality new housing development in selected settlements that considers the local character and is supported by new infrastructure provision and

2. Deliver sensitive additional facilities in settlements selected for growth to provide an improved level of local services appropriate to the settlement in keeping with the local character

**2.13** The SA Commentary Volume 2 identified that should all the development options in this document take place:

Total land area of all housing options	730.7 hectares
Total land area of all employment options	245.2 hectares
Total land area of all retail / office options	9.84 hectares
Number of sites using brownfield land	22

# Sustainability Appraisal and the Local Plan process 2

Number of sites using greenfield land	77
Number of sites within flood zone 3	8
Number of sites adjacent to flood zone 3	2
Number of sites within a Conservation Area	11

## Recommendations

**2.14** The SA Commentary Volume 2 made the following recommendations / development principles for all options:

- Specify materials to be used in the production of the development, with particular emphasis on waste re-use and recycling
- Specify waste arrangements after completion of development
- Specify on-site and where appropriate off-site supply of renewable energy / low carbon contributions
- Green Infrastructure / biodiversity protection and enhancement to be in place before development begins
- Flood risk assessments to be produced for the relevant options
- Improvements in infrastructure where issues have been identified
- Mix of housing types and tenures for housing options
- Mix of employment uses where appropriate for employment options
- Design principles to ensure all development is in keeping with local character
- Transport assessment / evaluation of green travel plans for those options identified to increase transport

**2.15** Consultation took place on the SA Commentary Volume 2 in February - April 2009 with a total of 35 comments being received. These comments made reference to the appraisal of the broad locations options, the plan objectives and the SA framework. As a result of these comments the following changes have been incorporated into the SA process:

- Amendments to the decision making criteria
- Inclusion of other plans for consideration in the SA Framework
- Plan Objective recommendations

## 2.3 SA Report

**2.16** The SA Report assessed 'The Plan for Stafford Borough - Draft Publication'. The document set out the development strategy, strategic locations and draft policies.

**2.17** The SA Report identified positive impacts across all sustainability objectives due to sustained economic prosperity and, where required, regeneration, at Stafford town, which is a Growth Point and County Town. Through the provision of affordable and specialist housing, there should be greater access to a home for local people and for an ageing population. The appraisal also considered that the environmental and cultural character of the Borough will be protected and enhanced through the delivery of Green Infrastructure, landscape and historic environment policies. There will be other benefits as a result of providing mitigation for the Cannock Chase Special Area of Conservation.

**2.18** Uncertain effects identified included economic viability and the impact this may have on the delivery of employment opportunities, economic competitiveness, housing and associated infrastructure. Other uncertain effects were the contributions and effects of climate change, which are difficult to assess. However, these effects are likely to be played out over the long term, giving the opportunity for monitoring and mitigation, such as working with service providers to offset the worst effects of change and reviewing policies. The SA Report also provided details for monitoring.

**2.19** The assessment made recommended changes to the wording of the following policies:

- Guiding Principles
- Spatial Strategy
- Stafford Town
- Stone Town
- West and South of Stone
- Areas outside Stafford and Stone
- New development in the countryside
- Planning Obligations

## 2 Sustainability Appraisal and the Local Plan process

- Replacement Dwellings
- Extensions to the curtilage of dwellings
- Development within and outside Recognised Industrial Estates
- Primary and Secondary Retail Frontages
- Vacant and Upper Floors
- New retail & leisure development outside the defined town centres
- Tourism

**2.20** Consultation took place on the SA Report during September - October 2011 with a total of 2 comments being received. These comments made reference to the appraisal of the some policies, the assessment of policies against sustainability objective 12, incorporating data from assessments on strategic transport schemes, reflecting objectives from the Water Framework Directive and including detail on sites in terms of a sequential test analysis, broad locations options, the plan objectives and the SA framework. As a result of these comments the following changes have been incorporated into the SA process:

- To appraise policies against each other to ensure they are consistent
- Appendix to include Water Framework Directive, Sequential Test and Habitats Regulations Assessment
- Ensure appraisal considers wider habitat and biodiversity impacts, not only potential impacts on Sites of Special Scientific Interest (SSSI).
- The appraisal to take into account assessments of possible biodiversity habitats present on previously developed land and the social benefits from green infrastructure and Suitable Accessible Natural Greenspace (SANGS)

## Baseline data and sustainability issues 3

### **3 Baseline data and sustainability issues**

**3.1** Baseline data and sustainability issues were first presented in the Scoping Report. Below is an update to the sustainability issues and a description of Stafford Borough, drawing on key elements of the evidence base and baseline data. Baseline data can be viewed in full in the technical appendices which accompany this report.

#### **General description**

**3.2** Stafford Borough covers an area of over 230 square miles and is centrally placed within Staffordshire County. Staffordshire is a large County between the conurbations of Manchester, 50 miles to the north, and Birmingham, 30 miles to the south. The Borough shares boundaries with Newcastle-under-Lyme, Stoke-on-Trent, Staffordshire Moorlands, East Staffordshire, Lichfield, Cannock Chase, South Staffordshire, Telford and Wrekin and North Shropshire. Stafford Borough is well located within the West Midlands region and nationally in terms of the transport network.

**3.3** The Stafford Borough area is locally distinctive in terms of character, landscape and natural resources. The area is home to over 120,000 people. 60% of the population live in Stafford and Stone whilst the remainder live in the rural area where there are a number of larger villages such as Eccleshall, Gnosall, Hixon, Barlaston, Great Haywood and Little Haywood as well as smaller villages and hamlets. To the north of the Borough are parts of the suburban fringe of Newcastle-under-Lyme and Stoke-on-Trent at Clayton, Blythe Bridge, Trentham and Meir Heath. There are more than 50 villages and hamlets, which vary in size, from a population of over 3,500 at Gnosall to under 200 people at Adbaston.

#### **Issues - Economic**

**3.4** Stafford Borough is strategically placed in the centre of Staffordshire with access to the M6 motorway and the West Coast mainline railway. Historically the Borough's economy has centred on traditional manufacturing industry, but in recent years such industries have undergone dramatic restructuring leading to job losses, de-industrialisation and considerable scaling back in levels of production, particularly in Stafford. This has had a significant impact on the local economy changing from predominantly manufacturing to more service based industries, with forecasts anticipating that this trend will continue in subsequent years. A result of these changes has also lead to a loss of employment areas to housing development. Despite this Stafford has seen a slight increase in business growth in the last few years.

**3.5** There are concerns due to the lack of diversity in certain types of employment, with the majority of the workforce employed in public administration, health and education, and 20.6% of people employed in the distribution, hotel and restaurant sectors. Therefore one issue is to diversify and adapt the employment base to encourage emerging high technology and creative industries, using strengths such as the higher education and renewable energy sectors.

**3.6** Stafford Borough has a low unemployment rate and the mean household income is above both the national and the West Midlands average.

**3.7** Much of the Borough is still agricultural and there are challenges in terms of alternative crops for renewable energy, changes in agricultural practises and development in the countryside.

**3.8** The tourism sector in the Borough offers many opportunities for the local economy through visits to Shugborough, the Ancient High House, Isaac Walton Cottage, Cannock Chase Country Park, Stafford Castle and the canal network.

**3.9** Stafford is the Borough's strategic town centre and a principal shopping destination. In recent years Stafford has begun to fall behind other competing centres across the region in terms of its retailing offer. The recent Town Centre Capacity Study showed that the number of vacant units (shops and offices) in the town centre are above the national average. The study also found that convenience shops and leisure opportunities are below the national average but comparison and retail service were above the national average.

#### **Social Issues**

**3.10** Evidence highlights that Stafford Borough has a number of areas with deficiencies in quality and quantity of open space, sport and recreation provision, particularly in Stafford town and certain rural areas. This type of provision can significantly improve the quality of life for local communities through associated health, well-being and productivity benefits.

**3.11** The current demand for housing in Stafford Borough is high, caused by a combination of natural demographic change, an increased growth in single person households and inward migration from adjoining areas. Pressure on the local housing market has increased in recent years due to a rise in prices, with the average house price in Stafford, at 2007, being £187,000 having steadily increased year on year since 2003. In addition there is a lack of 2 and 3 bedroomed houses within the existing housing stock within Stafford Borough, particularly in Stone.

### 3 Baseline data and sustainability issues

**3.12** Many groups are excluded from the housing market, in particular groups such as young people, single parent families and those on average local wages, due to the high cost of housing. The rural areas of Stafford Borough have experienced the most significant increase in house prices over recent years, creating pressure on rural communities with younger people being unable to afford the increased house prices. Whilst affordable housing has been provided over the years, this has not been consistent and is below identified needs.

**3.13** There is also a lack of provision to meet the identified needs of Gypsies and Travellers across the Borough, as identified in the Northern Housing Market Area Gypsy and Traveller Accommodation Needs Assessment (GTAA).

**3.14** In line with national trends the population demographic of Stafford Borough is ageing and by 2025 the projected numbers of people over 64 years of age is expected to increase by 49.4% to 34,800 people whilst the number of people aged over 85 years will almost double by to 95%. This raises issues for housing need and specialist housing including specially designed housing across Stafford Borough.

**3.15** Smaller settlements across the Borough such as Eccleshall, Gnosall, Great and Little Haywood provide more localised services and facilities for their communities. However in recent years a number of these centres have experienced a reduction in the range of services and facilities leading to greater car travel to other larger centres.

**3.16** Stafford Borough has a lower than average crime rate. However the general public continue to have a perceived fear of crime including anti-social behaviour, youth crime as well as drug and alcohol related problems. Design and layout of development can minimise opportunities for crime thereby ensuring that people feel safe.

**3.17** Previous consultations on the SA have reiterated the individual character of the towns and villages across the Borough, which has been identified as a sustainability issue.

**3.18** Stafford is not considered to be a deprived Borough in comparison with some parts of the country. However, there are significant levels of poverty and isolation in some parts of Stafford Borough, and some wards in Stafford Town are among the poorest in Staffordshire.

#### Environmental Issues

**3.19** Climate change is now considered to be the greatest threat to our social well-being and economic future. The effects of Climate change such as extreme weather and greater risk of flooding are a real issue for the UK. Severe flood events caused extensive damage to Stafford town and extensive tracts of farmland in recent years.

**3.20** The renewable energy study identified renewable energy and low carbon opportunities across the Borough. In addition the Green Infrastructure study identified a network of green infrastructure and opportunities that can help combat the effects of climate change.

**3.21** Water quality, in terms of biological and chemical quality, is improving in rivers within the Borough but could improve further.

**3.22** The Borough has a rich and varied natural environment composed of a diverse range of wildlife sites and habitats, including seventeen Sites of Special Scientific Interest (SSSI), three Ramsar sites, four Special Areas of Conservation (SAC) and three National Nature Reserves. In addition there are more than a hundred sites identified locally as Sites of Biological Interest (SBIs). There has been decline in certain species and habitats across the Borough, along with the quality of some protected areas. The protection, enhancement, improvement and proper management of these sites is a key issue for the Stafford Borough. The Staffordshire Biodiversity Action Plan identifies land to the south east as the Cannock Chase Ecosystem Action Plan with priority habitats being Lowland Heathland. Land to the west of the Borough is categorised as central farmland with priority habitats being hedgerows, arable field margins, lowland meadows and rivers

**3.23** Stafford town has the Cannock Chase Area of Outstanding Natural Beauty, a Special Area of Conservation and Green Belt to the south east, which will need to be considered when appraising site allocations and the development strategy. In the last few years a high percentage of development has taken place on brownfield land. This results in less greenfield land being used for development.

**3.24** There are a number of European designated sites within the Borough, which require a separate assessment. More information can be found in Appendix 2.

**3.25** The historic environment offers many opportunities for the Borough, through increased visitor use and sense of character. It will be important that such environments are also protected and where possible enhanced.

## Baseline data and sustainability issues 3

### Summary of the Sustainability Issues

Economic issues
<ul style="list-style-type: none"> <li>• High levels of deprivation in some areas of the Borough</li> <li>• High number of empty homes scattered across the Borough, the majority of which are empty for more than 6 months</li> <li>• Slight increase in number of homeless households in recent years</li> <li>• Low level of provision of affordable housing compared with rising house prices</li> <li>• Lack of access to services and facilities in some parts of the Borough</li> <li>• The level of outdoor space provision is much lower than the national target</li> </ul>

Social Issues
<ul style="list-style-type: none"> <li>• Decline in manufacturing industry resulting in job losses</li> <li>• Opportunities for tourist related economy</li> <li>• Slight increase in VAT business start ups in Stafford Borough</li> <li>• Decline in agricultural industries</li> <li>• Vacant units within the town centres</li> <li>• Loss of Individual character for Stafford Borough's settlements</li> </ul>

Environmental Issues
<ul style="list-style-type: none"> <li>• Loss of biodiversity habitats</li> <li>• Quality of SSSI's is important, but still below the national target</li> <li>• Whilst river biology and chemistry have improved over the last decade, both are still below the national average</li> <li>• High percentage of new homes have been delivered on previously developed land in last 10 years</li> <li>• Stafford Borough's Biomass energy project will provide renewable energy and opportunities for further renewable energy development in the future</li> </ul>

## 4 Sustainability Appraisal Framework

### 4 Sustainability Appraisal Framework

**4.1** The Sustainability Appraisal Framework is the framework that will be used to appraise the development strategy, strategic sites and planning policies. The framework is made up of sustainability objectives, indicators and targets tailored to the key sustainability issues for Stafford Borough.

**4.2** The principle of the SA Framework was outlined in the Scoping Report, in particular the methodology used for assessing each planning policy or plan option. The table below shows the sustainability appraisal objectives that will be used to appraise the 10 policy choices in this Report. Following consultation on the two SA Commentary documents and the SA Report, additional questions have been included to illustrate how policies are appraised against the SA objectives.

#### 4.1 Sustainability Appraisal Objectives

**4.3** The following objectives have been used to appraise the development strategy and planning policies. Under each objective there are a number of indicators and targets. Following consultation on the SA Scoping Report, SA Commentary Volume 1 and Volume 2, additional questions have been included. The questions illustrate how each the strategy and policy have been appraised.

Sustainability Objective SEA Topic	Indicator and Target	Detailed Decision Making Criteria
1. To create high, stable and equitable levels of employment	N/A  <b>Target:</b> Maintain good performance of employment	Will it reduce unemployment levels?  Will it provide job opportunities for those most in need of employment?
	Unemployment Rate  <b>Target:</b> Maintain good performance	Will it help to improve earnings?
	Gross Value Added  <b>Target:</b> Increase in line with figure for South Staffordshire	Will it increase access to employment opportunities in, or accessible to, rural areas?
	Number of jobs created across all sectors of the economy  <b>Target:</b> Increase	Will it lead to a net reduction in the number of people commuting to work outside the Borough?
	Number of new jobs created in rural areas  <b>Target:</b> Increase	
2. To ensure high and stable level of economic diversity and competitiveness that recognises social and environmental issues	N/A  <b>Target:</b> Increase share of FDI	Will it promote growth in key sectors?  Will it encourage inward investment?

# Sustainability Appraisal Framework 4

Sustainability Objective SEA Topic	Indicator and Target	Detailed Decision Making Criteria	
		Will it encourage graduates to return and help to retain skilled employees in the area?	Will it provide or contribute to the availability of a balanced portfolio of employment sites?
	The number of people reaching NVQ4+ qualifications  <b>Target:</b> Increase		
	Employment land take up rates on previously developed land  <b>Target:</b> Increase take up rates		
	Number of planning permissions for business premises linked to farm diversification in rural areas  <b>Target:</b> Increase		
	Employment land take up rates  <b>Target:</b> Increase take up to meet the requirement		
	Adaptability and proximity of new developments to services  <b>Target:</b> No new development beyond 5 km of the Borough's towns	Will it make Stafford Borough more attractive to potential visitors and businesses?	
	Number of Vacant Units  <b>Target:</b> Reduce	Will it support existing services and facilities?	
	Rank of centres: Stafford ranked at 147 nationally in 2010  <b>Target:</b> Increase rank	Will it contribute to a quality built environment?	
	Housing densities in town centres  <b>Target:</b> 40-50 dwellings per hectare in town centres		
	Retail land take up rates  <b>Target:</b> Increase		
	Number of planning permissions for business premises linked to farm diversification in rural areas.  <b>Target:</b> Increase	Will it increase access to employment opportunities in, or accessible to, rural areas?	
	Availability of affordable homes to accommodate local needs in rural areas  <b>Target:</b> Increase according to identified need	Will it contribute to the provision of affordable housing which meets identified local need?	
3. To sustain the vitality and viability of Stafford Borough's towns and villages, and their communities	N/A		
4. To support the needs of the local rural economy and communities.	N/A		

## 4 Sustainability Appraisal Framework

Sustainability Objective SEA Topic	Indicator and Target	Detailed Decision Making Criteria
	Amount of employment land on previously developed land that could be used to expand existing business located within the Green Belt  <b>Target:</b> Increase according to identified need	Re-use vacant land and buildings for employment purposes in the rural area  <b>Target:</b> Increase according to identified need
	Number of facilities located within rural centres  <b>Target:</b> Increase according to identified need	Number of sites identified for affordable housing through rural exception sites  <b>Target:</b> Increase according to identified need
5. To reduce vulnerability to the effects of climate change such as the risk of flooding, on public wellbeing, the economy and the environment.	Population, material assets The number of developments given planning permission contrary to Environment Agency advice  <b>Target:</b> All new developments to incorporate water saving measures and sustainable drainage techniques  The number of developments given planning permission contrary to Environment Agency advice the environment  <b>Target:</b> None	Will it reduce the proportion of development within the floodplain?  Will it minimise the risk of flooding from rivers and watercourses to people and property?  Will it result in development that is able to withstand the effects of climate change?
6. To ensure that everyone has the opportunity of a decent and affordable home	Population and Human Health  <b>Target:</b> All / Increase  Number of affordable / special needs housing  <b>Target:</b> In line with local need  Number of unfit dwellings  <b>Target:</b> Meet Government's decent homes standards  Homelessness  <b>Target:</b> To provide sufficient short / medium term accommodation	Will it contribute to the provision of affordable housing which meets identified local needs?  Will it contribute to a mix of housing types?  Will it reduce homelessness?  Will it increase the range and affordability of housing for all social groups?

# Sustainability Appraisal Framework 4

Sustainability Objective SEA Topic	Indicator and Target	Detailed Decision Making Criteria
	Number of new residential developments that provide for the accessibility of all users  <b>Target:</b> All / Increase	Will it reduce the number of vacant properties?
	Number of new residential developments in the rural area providing for identified affordable / local needs housing  <b>Target:</b> Increase according to identified need	
	Number of new residential developments incorporating high quality layouts and landscaping  <b>Target:</b> All	
	Number of homes meeting Code for Sustainable Homes  <b>Target:</b> Increase / in line with Government targets	
7 To improve opportunities for access for all to work, education, health and local services	Population and Human Health  <b>Target:</b> All Disabled access  <b>Target:</b> All new build to comply with Disability Discrimination Act % of development within walking distance (350 metres) of a frequent service  <b>Target:</b> 100% of all new developments in urban areas Number of mixed use developments  <b>Target:</b> Increase	Will it result in new developments being located in areas served by public transport? Will it make access more affordable? Will it improve accessibility to key local services? Will it make access easier for those without access to a car? Will it protect existing key services and facilities?
8 To reduce and prevent crime and reduce fear of crime	Population and Human Health  <b>Target:</b> Increase Recorded crime per 1,000 population  <b>Target:</b> Maintain good results relative to other districts Fear of crime surveys  <b>Target:</b> Reduce fear of crime	Will it reduce actual levels of crime? Will it reduce the fear of crime? Will it promote design that discourages crime? Will it reduce social disorder?

## 4 Sustainability Appraisal Framework

Sustainability Objective SEA Topic	Indicator and Target	Detailed Decision Making Criteria
9. To reduce the impact of noise and light pollution	<p>Population and Human Health</p> <p><b>Target:</b> Increase</p> <p>Number of new developments incorporating secured by design certification</p> <p>Number of developments incorporating landscaping as a way of reducing potential noise or light impacts</p> <p><b>Targets:</b> Increase</p> <p>Public concern over noise</p> <p><b>Target:</b> Low % of residents surveyed who are concerned with different types of noise</p> <p>Proximity of land uses that create noise and / or anti-social behaviour at night</p> <p><b>Target:</b> Low number of breaches of Integrated Pollution Prevention and Control permits on permitted noise level</p> <p>Public concern over light pollution from residential developments</p> <p><b>Target:</b> Low % of residents surveyed who are concerned about light pollution</p>	<p>Will it reduce direct pollution?</p> <p>Will it reduce indirect pollution (e.g. increased traffic)?</p>
10. To improve health, safety and well-being across the whole community	<p>Population and Human Health</p> <p><b>Target:</b> Reduce</p> <p>Number of Listed Buildings 'at Risk' across the Borough</p> <p>Number of development sites that lead to the creation and enhancement of open spaces</p> <p><b>Target:</b> Increase in line with Green Infrastructure Strategy</p> <p>Number of waterside developments which improve accessibility and quality of the water environment</p> <p><b>Target:</b> All</p> <p>% of residents within 500m (15 minutes walk) of public open space</p> <p><b>Target:</b> Increase</p> <p>Modal Split</p>	<p>Will it ensure that all people have access to public open space within a reasonable distance from where they live?</p> <p>Will it improve access to natural greenspace?</p> <p>Will it improve access to high quality health facilities?</p> <p>Will it encourage healthy lifestyles?</p> <p>Will potential trips on foot, quadruple levels of cycling trips by 2012 compared to 1996 (Dept. For Transport, Transport 10 year Plan, 2000)</p>

# Sustainability Appraisal Framework 4

Sustainability Objective SEA Topic	Indicator and Target	Detailed Decision Making Criteria
	Air Quality Management Area  <b>Target:</b> No air quality management area  Number of buildings and vacant land reused  <b>Target:</b> Increase	Number of developments within town centres incorporating quality landscaping and linkages with the surrounding urban fabric  <b>Target:</b> All  Hectares of public open space per 1,000 population  <b>Target:</b> Increase in line with local standards and Green Infrastructure Strategy
11. To reduce societal contributions to climate change	Air, Population, Human Health and climatic factors  <b>Target:</b> All  Length of cycleways  <b>Target:</b> Increase Number of new development incorporating water efficiency techniques  <b>Targets:</b> Increase  % of new developments encompassing energy efficient design / layout / features  <b>Target:</b> 30% improvement in energy efficiency over 15 years from 1996 (11.1% achieved so far)  Woodlands lost to new development  <b>Target:</b> None Proportion of energy supply to be secured from decentralised and renewable or low-carbon energy sources  <b>Target:</b> 10% or higher	Will it minimise greenhouse gas emissions?  Will it reduce carbon dioxide emissions?  Will it utilise existing infrastructure?  Will it lead to reduced consumption of materials and resources?  Will it reduce waste generation?  Will it increase waste recovery and recycling?  Will it lead to an increased proportion of energy needs being met from renewable sources?  Will it increase energy efficiency?  Will it make use of new and clean technologies?

## 4 Sustainability Appraisal Framework

Sustainability Objective SEA Topic	Indicator and Target	Detailed Decision Making Criteria
12. To protect and enhance biodiversity	Biodiversity, Flora and Fauna  Target: Reduce to minimum  Number of developments that may affect biodiversity conservation value  Quality of historic parks and gardens  Target: Maintain / Conserve  Quality of Sites of Special Scientific Interest (SSSI)  Target: 95% of SSSIs to be in 'favourable or 'recovering' condition  Sites achieving Biodiversity Action Plan  Target: To achieve 100% of targets as set out in Staffordshire Biodiversity Action Plan  Number of planning permissions given affecting SSSI designated sites  Target: No planning permissions to be given that affect SSSI sites  Number of developments that protect and enhance sites and spaces important for biodiversity as set out in the Staffordshire Biodiversity Action Plan  Target: Increase	Will it lead to the protection of designated sites?  Will it lead to the enhancement of designated sites?  Will it result in habitat creation at all scales/Will it conserve and enhance natural/ seminatural habitats?  Will it conserve and enhance nationally significant species and habitats?  Will it improve biodiversity within urban areas?  Will it enhance the wider ecological network and seek to minimise the fragmentation of nature corridors and networks?
13. To protect and conserve soil	Soil  Target: Maximise use where possible  Area of statutory contaminated land remedied  Target: Await Environment Agency Soil Strategy Implementation Plan  Area of land converted to organic / agricultural environment schemes  Target: Increase  Soil degradation  Target: Minimise the degradation or loss of soils to new developments  Number of developments given planning permission contrary to EA advice	Will it result in the protection/retention of the Best and Most Versatile agricultural land (Grades 1-3a)?  Will it minimise and seek to reclaim derelict and contaminated land?

# Sustainability Appraisal Framework 4

Sustainability Objective SEA Topic	Indicator and Target	Detailed Decision Making Criteria
14. To protect and enhance water quality of the Borough's rivers whilst maximising their carrying capacity through achieving sustainable water resource management	<p>Water</p> <p><b>Target:</b> No planning permission to be granted contrary to the Environment Agency's advice based on the risk of contamination to underlying groundwater</p> <p>Number of developments that increase water consumption or pollution</p> <p><b>Target:</b> None / Minimise Quality of rivers, canals and freshwater bodies within the Borough</p> <p><b>Target:</b> Achieve standards set out by the Water Framework Directive</p> <p>Number of new developments incorporating sustainable drainage systems and other water saving techniques</p> <p><b>Target:</b> All new development to incorporate water saving measures</p> <p>Number of developments given planning permission contrary to Environment Agency advice based on an unacceptable risk of contamination to 'Controlled Waters'</p> <p><b>Target:</b> None</p> <p>Number of development proposals which are to dispose of foul waters via a non-mains technique</p> <p><b>Target:</b> All large developments to dispose via mains</p>	<p>Will it improve the quality of controlled waters?</p> <p>Will it increase the quality and quantity of the water environment?</p> <p>Will it reduce direct or indirect pollution of the water environment?</p> <p>Is there adequate foul drainage infrastructure?</p> <p>Will it protect floodplain capacity?</p> <p>Is there clear opportunity for future maintenance of Sustainable Drainage Systems?</p>
15. To protect, enhance and, where necessary, restore designated landscape areas and townland	<p>Cultural Heritage</p> <p>Landscape</p> <p>character, scenic beauty, local distinctiveness, historic and cultural character</p>	<p>Change in areas of highly sensitive historic and landscape character</p> <p><b>Target:</b> None</p> <p>Number and % of Listed Buildings and Scheduled Monuments 'at risk'</p> <p><b>Target:</b> Reduce the number of sites and buildings 'at risk'</p> <p>Number of historic buildings restored and brought back into use</p> <p><b>Target:</b> Increase</p> <p>% of Borough covered by historic landscape / urban characterisation studies</p> <p><b>Target:</b> Increase</p> <p>Number of planning permissions adversely affecting the Cannock Chase Area of Outstanding Natural Beauty (AONB)</p>

## 4 Sustainability Appraisal Framework

Sustainability Objective SEA Topic	Indicator and Target	Detailed Decision Making Criteria
	<p><b>Target:</b> None</p> <p>Provision of accessible natural greenspace</p> <p><b>Target:</b> A greenspace of at least 2ha &lt; 300m from home; a Local Nature Reserve at a minimum of 1ha per thousand population; at least one greenspace site within 5km of home and one 500ha site within 10km of home</p> <p>Number of developments and re-use of existing buildings in the Green Belt area that do not maintain its openness</p> <p><b>Target:</b> None</p> <p>Number of people living close to accessible woodland, accessible recreational routes and spaces</p> <p><b>Target:</b> Increase</p>	Will it lead to reduced pressure on the cultural heritage (e.g. archaeology)?
16. To create a sense of community identity and belonging	<p>Population</p> <p><b>Projected household change</b></p> <p><b>Target:</b> Maintain number of households</p>	Will it encourage engagement in community activities?
17. To ensure tolerance, respect and engagement with people from different cultures, backgrounds and beliefs recognising their rights and responsibilities	<p>Population and Human Health</p> <p>% of residents who think that people being attacked because of their skin colour, ethnic origin or religion is a very big or fairly big problem in their local area</p> <p><b>Target:</b> Reduce</p>	Will it lead to a net reduction in the number of people commuting to work outside the borough?
18. To ensure that all individuals and groups in society have the opportunity to effectively engage in issues relating to their community	<p>Population and Human Health</p> <p>E-enabled interactions as a proportion of all interactions</p> <p><b>Target:</b> Increase E-enabled interactions for the new Local Plan</p> <p>Number of DPD's compliant with the Statement of Community Involvement (SCI)</p> <p><b>Target:</b> All DPD's to be compliant with the SCI</p>	Will it increase the ability of people to influence decisions?

## Sustainability Appraisal Framework 4

Sustainability Objective SEA Topic	Indicator and Target	Detailed Decision Making Criteria
19. To encourage a strong, inclusive, community and voluntary sector	Population and Human Health <b>Target:</b> Maintain % of voluntary / community organisations performing well	Will it encourage increased voluntary levels?
20. To engender a sense of civic and neighbourhood values, responsibility and pride	Population and Human Health <b>Target:</b> Increase well-being score across the neighbourhoods in the Borough	Will it encourage engagement in community activities?

## 5 Summary and Recommendations

### 5 Summary and Recommendations

**5.1** This document appraises the Strategic Policy Choices which includes three options for the level of development, three options for the settlement hierarchy, two options for an affordable housing policy and two options for delivery of the strategy.

**5.2** Potential positive impacts can be seen across several sustainability objectives, including delivery of housing, employment land and meeting community needs. There are several uncertain and negative effects identified due to pressure on the environment and infrastructure from increased development along with additional contributions to factors affecting climate change. It should be recognised that the appraisal in this document does not look at detailed policy wording and so many of the uncertain or negative effects can be overcome through appropriate wording, such as considering landscape, biodiversity impacts or requiring a certain standard of development within a policy which would be used to assess planning applications.

**5.3** The SA acknowledges that the identified settlement strategy preferred in the Strategic Policy Choices is appropriate in that it would provide development across a variety of settlements which would meet both urban and rural needs. The preferred level of development of 500 dwellings per year and 8 hectares per year is considered appropriate against a higher or lower level as this would meet local needs as well as some migration needs. There is concern that there could be an over provision of employment land over the lifetime of the plan, however this could be addressed through policy wording. The SA also recognises that the level of development, whilst a continuation of the average which has been delivered over the last 10 years, would still have contributions to factors affecting climate change.

**5.4** The SA concludes for the delivery of affordable housing a flexible approach which considers different thresholds is more appropriate as this would allow for a higher delivery in those areas which are more viable. The SA recommends that a basis of 30% is used unless independent studies show a higher proportion is viable in which case this should be required in those areas..

**5.5** The SA concludes that the criteria for the policy to guide delivery of new development that is not strategic, i.e not identified as an allocation in The Plan for Stafford Borough to have many positive effects in that it considers a number of factors. However it is recognised that it could be improved to include a requirement for local consultation, not just with neighbouring properties, a requirement for sites to be on previously developed sites, consideration of green networks and green infrastructure and opportunities for a low carbon network.

**5.6** The same criteria was used to appraise the approach for identifying development boundaries. The SA concludes that using this option alone could delay development in the short term due to time taken to produce a subsequent allocation document or neighbourhood development plan which could have an impact on meeting housing needs in settlements outside Stafford and Stone in particular. It is considered this approach would not have a negative impact on employment sites as there would be strategic site allocations on employment sites and there would continue to be boundaries around existing employment sites. The SA recommends that both a criteria based policy is adopted with additional criteria along with the opportunity to introduce residential development boundaries where considered necessary is the most appropriate option as it would allow for development to take place in advance of an allocation document being adopted. A criteria based policy alone, without the recommended additions would not provide certainty to local communities or focus on previously developed land. Establishing residential development boundaries without criteria could also lead to many uncertain effects.

**5.7** More detail on the specific appraisal can be found in Appendix 1.

#### 5.1 Next Steps

**5.8** The results of this Sustainability Appraisal document along with the results from public consultation, will be fed back into the production of 'The Plan for Stafford Borough - Publication Document'. This stage will finalise the core policies, development strategy, strategic locations for growth and development management policies. These will be appraised in a document called 'Revised Sustainability Appraisal Report' before being submitted to the Secretary of State and considered at the Examination.

# Appraisal of Strategic Policy Choices

## Appraisal of Strategic Policy Choices

### Key of Sustainability Appraisal

Major positive ✓ ✓	Major Negative ✗ ✗
Minor Positive ✓	Minor Negative ✗
Neutral Effect 0	Uncertain / depends on implementation ?

### Sustainability Appraisal time frames

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

### Policy Choice 1: Remaining at 500 new houses & 8 hectares of employment land per year

SA Obj	Indicators	Effects over time			Comments
		Short	Medium	Long term	
1	Employment rate	✓	✓	✓	Continues to provide employment land
2	Employment land	✓	✓	✓	Continues to provide employment land
3	Vacant units	0	?	✗	Level of employment land is above that potentially needed and there is a risk that it would lead to an increase of vacant units towards the end of the plan period
4	Farm diversification, affordable housing	✓	✓	✓	Assuming development is not concentrated in one settlement
5	Developments contrary to EA advice, flood zone	✓	✓	✓	There are sufficient sites outside of areas of flood risk for this level of development
6	Affordable housing	✓	✓	✓	Providing for 500 new homes will allow for a proportion to be affordable and local need
7	Public transport access, services	?	?	?	Depends on the location of new development in relation to existing services and facilities
8	Crime	?	?	?	Depends on implementation
9	Noise and light impacts	0	0	✗	Depends on implementation and location of development
10	Natural greenspace	0	0	0	Depends on location and accessibility to natural and recreation areas
11	Renewable & low carbon development	✗	✗	✗	Without suitable policies and strategies in place development of this scale will lead to increase in greenhouse gas emissions, carbon dioxide and an increase in consumption of materials
12	SSSI quality, impact on species, networks	?	?	?	There are sufficient sites outside of designated areas for this level of development, however, would still depends on implementation, design and location of development

# Appraisal of Strategic Policy Choices

<b>Policy Choice 1: Remaining at 500 new houses &amp; 8 hectares of employment land per year</b>						
SA Obj	Indicators	Effects over time			Comments	
		Short	Medium	Long term		
13	PDL	0	x	x	There is not sufficient previously developed land in the key settlements to provide for all development need and so greenfield land will be required which without a pdl requirement policy in place could have negative impacts.	
14	River quality, run off	0	x	x	Without suitable policies in place to deal with water resource use, disposal and run-off, increased development could have a negative impact	
15	Buildings at risk	?	?	?	The level of development set out in this option are broadly in line with what has been developed historically and so there will continue to be an element of change to the character of settlements within the Borough. The specific design, scale and location will be important to ensure any changes do not have a negative impact on the character of settlements and landscape. There are sufficient sites outside of designated areas	
16	Household change	✓	✓	✓	The option aims to meet local and in migration needs which should reduce need for people to work or move outside of the Borough	
17	Attitude to area	0	0	0		
18	Compliance with SCL, public engagement	0	0	0	Depends on implementation of strategy and community involvement	
19	Voluntary organisations	0	0	0		
20	Wellbeing	✓	✓	✓	Consider providing level of development to meet local needs and in migration will assist with wellbeing needs relating to housing and employment	

Overall this option is continuing with the average provision of employment and housing development over the last 10 years. There is the risk that as the option is providing development above that projected for employment need it could lead to vacant units along with the development of greenfield land. Continuing with this level of growth without other policies in place would lead to a change in the character of the Borough's towns and villages, contribute towards climate change and put pressure on infrastructure.

<b>Policy Choice 2: Reducing provision, for example to 250 new houses &amp; 4 hectares of new employment land per year</b>						
SA Obj	Indicators	Effects over time			Comments	
		Short	Medium	Long term		
1	Employment rate	✓	✓	?	Option would still provide employment land which would assist with employment. The level may impact the economy later in the plan period	
2	Employment land	✓	✓	?	Option would still provide employment land – in line with need	
3	Vacant units	✓	✓	✓	Option would provide the level of employment land in line with need which would not result in oversupply in any one area or vacant units	
4	Farm diversification, affordable housing	✓	✓	✓	Assuming development is not concentrated in one settlement	
5	Developments contrary to EA advice, flood zone	✓	✓	✓	Would not result in land being developed within flood plain as there are sufficient sites outside floodplain	
6	Affordable housing	x	x	x	A strategy based on this level would not provide as much affordable housing	
7	Public transport access, services	0	0	0	Depends on the location of new development in relation to existing services and facilities	
8	Crime	?	?	?		

# Appraisal of Strategic Policy Choices

<b>Policy Choice 2: Reducing provision, for example to 250 new houses &amp; 4 hectares of new employment land per year</b>				
SA Obj	Indicators	Effects over time	Comments	
		Short	Medium	Long term
9	Noise and light impacts	✓	✓	✓
10	Natural greenspace	?	?	?
11	Renewable & low carbon development	x	x	x
12	SSSI quality, impact on species, networks	0	0	0
13	PDL	✓	✓	x
14	River quality, run off	?	?	?
15	Buildings at risk	?	?	?
		The level of development set out in this option is below what has been developed on average over the last 10 years and is more in line with what has been built in most recent years, so there will continue to be an element of change to the character of settlements within the Borough. Design, scale and location will be important to ensure any changes do not have a negative impact on the character of settlements and landscape. There are sufficient sites outside of designated areas for this level of development		
16	Household change	✓	✓	✓
17	Attitude to area	0	0	0
18	Compliance with SCI, public engagement	?	?	?
19	Voluntary organisations	0	0	0
20	Wellbeing	✓	✓	?
		Consider providing level of development to meet local needs and smaller element of in migration would assist with wellbeing needs relating to housing and employment		
		This option would reduce the potential for vacant units, allow a higher proportion of development to come from previously developed land and not result in significant change to the character of the Boroughs settlements. However there are risks that this option would not result in as much affordable housing being built or allow for competition within the local economy. As with all strategy options, without policies in place there could be negative impacts in terms of contribution to climate change, infrastructure and loss of biodiversity and green links.		
<b>Policy Choice 3: Increasing provision, for example to 750 new houses &amp; 12 hectares of employment land per year</b>				
SA Obj	Indicators	Effects over time	Comments	
		Short	Medium	Long term
1	Employment rate	✓	✓	✓
2	Employment land	✓✓	✓✓	✓✓
3	Vacant units	0	x	x
4	Farm diversification, affordable housing	✓	✓	✓
		Delivery of employment land Significant delivery of employment land This option would lead to an increase of vacant units Higher level of development to rural area		

# Appraisal of Strategic Policy Choices

<b>Policy Choice 3: Increasing provision, for example to 750 new houses &amp; 12 hectares of employment land per year</b>						
SA Obj	Indicators	Effects over time	Short	Medium	Long term	Comments
5	Developments contrary to EA advice, flood zone	0	x	x	x	Depending on location of development, the level of development in this option could result in development in the floodplain
6	Affordable housing	\V	\V	\V	\V	Higher level of affordable housing delivered
7	Public transport access, services	?	?	?	?	Depends on location of development and implementation development
8	Crime	?	?	?	?	
9	Noise and light impacts	0	x	xx	xx	This level of development is much higher than the average level of development over the last 10 years and would lead to significant noise and light impacts as well as possible impact on sensitive areas
10	Natural greenspace	?	?	?	?	Depends on implementation and location of development
11	Renewable & low carbon development	xx	xx	xx	xx	Development of this scale will lead to an increase in greenhouse gas emissions, carbon dioxide and an increase in consumption of materials without suitable policies and strategies in place.
12	SSSI quality, impact on species, networks	?/x	?/x	?/x	?/x	Depends on implementation. However a greater level of development could impact on ecological networks
13	PDL	?	xx	xx	xx	As PDL is used up there will be significant loss of greenfield land for this level of development
14	River quality, run off	x	x	x	x	Without suitable policies in place to deal with water resource use, disposal and run-off, increased development could have a negative impact
15	Buildings at risk	x	x	x	xx	Development at this scale does not have a precedent in the Borough and would lead to significant change of the character of towns, villages and landscape
16	Household change	\V	\V	\V	\V	Would lead to less people moving or working outside the Borough
17	Attitude to area	x	x	x	x	This level of development could have an impact on attitude to the area due to loss of natural greenspace, increase in construction activity and potential infrastructure pressures
18	Compliance with SCI, public engagement	?	?	?	?	Depends on implementation of strategy and community involvement
19	Voluntary organisations	0	0	0	0	
20	Wellbeing	?	?	?	?	Uncertain whether increased development would lead to increased or decreased well being
This option would provide a significant amount of development over the lifetime of the plan, which could have negative impacts in terms of noise and light, change in character of towns, villages and surrounding landscape, impact on infrastructure, contributions to climate change. There is also a risk that development at this scale would lead to vacant units which would impact well being, vitality of the area.						
<b>Policy Choice 4: New development focused on the County Town of Stafford only</b>						
SA Obj	Indicators	Effects over time	Short	Medium	Long term	Comments
1	Employment rate	\V	\V	\V	\V	Will lead to increased employment opportunities in Stafford which could serve population of the Borough and beyond
2	Employment land	\V	\V	\V	\V	Will lead to a portfolio of employment sites in Stafford
3	Vacant units	x	x	x	x	Delivering all employment development in one location could lead to over supply and result in vacant units
4	Farm diversification, affordable housing	x	x	x	x	Whilst employment in Stafford could serve some rural communities it would not meet rural needs within the villages such as community facilities or housing

# Appraisal of Strategic Policy Choices

<b>Policy Choice 4: New development focused on the County Town of Stafford only</b>					
5	Developments contrary to EA advice, flood zone	0	x	x	x
6	Affordable housing	x	x	x	x
7	Public transport access, services	√	√	√	
8	Crime	?	?	?	
9	Noise and light impacts	0	x	x	
10	Natural greenspace	√	√	√	
11	Renewable & low carbon development	?	?	?	
12	SSSI quality, impact on species, networks	?	?	x	
13	PDL	0	x	x	
14	River quality, run off	0	x	x	
15	Buildings at risk	0	x	x	
16	Household change	√	√	√	
17	Attitude to area	x	x	x	
18	Compliance with SCI, public engagement	0	0	0	
19	Voluntary organisations	0	0	0	
20	Wellbeing	0	0	0	
<b>Policy Option 5: New development focused on County Town of Stafford, the market town of Stone and either one or more of the principal settlements</b>					
SA Obj	Indicators	Effects over time			
		Short	Medium	Long term	Comments
1	Employment rate	√	√	√	Would provide employment opportunities across the Borough
2	Employment land	√	√	√	Would provide a portfolio of employment sites across the Borough

# Appraisal of Strategic Policy Choices

Policy Option 5: New development focused on County Town of Stone and either one or more of the principal settlements		Market town of Stafford, the market town of Stone and either one or more of the principal settlements	
3	Vacant units	✓	✓
4	Farm diversification, affordable housing	✓	✓
5	Developments contrary to EA advice, flood zone	✓	✓
6	Affordable housing	✓	✓
7	Public transport access, services	✓	✓
8	Crime	?	?
9	Noise and light impacts	✓	✓
10	Natural greenspace	✓	✓
11	Renewable & low carbon development	?	?
12	SSSI quality, impact on species, networks	✓	✓
13	PDL	✓	✓
14	River quality, run off	0	0
15	Buildings at risk	✓	✓
16	Household change	✓	✓
17	Attitude to area	?	?
18	Compliance with SCI, public engagement	?	?
19	Voluntary organisations	0	0
20	Wellbeing	?	?

# Appraisal of Strategic Policy Choices

**Policy Option 5: New development focused on County Town of Stafford, the market town of Stone and either one or more of the principal settlements**

line with what has been developed historically across the Borough only that it limits the development to one or more principal settlements. There will continue to be an element of change to the character of settlements within the Borough which may be more significant in the identified settlements. Design, scale and location will be important to ensure any changes do not have a negative impact on the character of settlements and landscape. There are sufficient sites outside of designated areas

**Policy Choice 6: New Development distributed widely across the Borough to each of the principal settlements, cross border settlements and other identified settlements across the Borough as well as at Stafford and Stone**

SA Obj	Indicators	Effects over time			Comments
		Short	Medium	Long term	
1	Employment rate	✓	✓	✓	Would provide employment opportunities across the Borough
2	Employment land	✓	✓	✓	Would provide a portfolio of employment sites across the Borough
3	Vacant units	✓	✓	✓	Wouldn't lead to an oversupply of employment in one location which would assist with level of vacant units
4	Farm diversification, affordable housing	✓✓	✓✓	✓✓	Consider principal and identified settlements would meet a higher proportion of rural housing and employment needs
5	Developments contrary to EA advice, flood zone	✓	✓	✓	This option would mean that there is no pressure to develop sites in the flood plain as there would be a greater number of sites available across the Borough
6	Affordable housing	✓	✓	✓	Whilst the distribution of sites may result in smaller sites and less contribution of affordable housing there would be opportunity to meet local needs in more settlements
7	Public transport access, services	✓	✓	✓	It is considered that Stafford, Stone & principal settlements, cross border settlements are well served by transport, services and facilities
8	Crime	?	?	?	
9	Noise and light impacts	✓	✓	✓	Distributing development across towns and villages would mean smaller sites which would have less impact in terms of noise and light
10	Natural greenspace	✓	✓	✓	Consider Stafford, Stone and the principal settlements are adequately served by green networks, public footpaths and open space
11	Renewable & low carbon development	?	?	?	Whilst some settlements may lend themselves better to the development of a low carbon network, development at existing settlements would still provide opportunities
12	SSSI quality, impact on species, networks	?	?	?	Depends on specific location and design of development but considered there are sufficient sites at the settlements which would not impact on designated sites with the exception of some cross border settlements which are in the Green Belt. Detailed site layout and opportunities for enhancement would still need to be considered
13	PDL	✓	✓	x	Development in a variety of locations would be able to come from previously developed land
14	River quality, run off	✓	✓	✓	Development in a variety of locations should reduce the pressure on water supply, limit surface water run off and not have a negative impact on the functional flood plain
15	Buildings at risk	✓?	✓?	✓?	The strategy set out in this option is broadly in line with what has been developed in historically across the Borough, so there will continue to be an element of change to the character of settlements within the Borough. Design, scale and location will be important to ensure any changes do not have a negative impact on the character of settlements and landscape. There are sufficient sites outside of designated areas with the exception of cross border settlements where development could impact on the openness of the Green Belt

# Appraisal of Strategic Policy Choices

<b>Policy Choice 6: New Development distributed widely across the Borough to each of the principal settlements, cross border settlements and other identified settlements across the Borough as well as at Stafford and Stone</b>						
SA Obj	Indicators	Effects over time	Short	Medium	Long term	Comments
1	Employment rate		0	0	0	
2	Employment land		0	0	0	
3	Vacant units		0	0	0	
4	Farm diversification, affordable housing		✓	✓	✓	30% of rural sites for affordable housing but needs may be higher than this level
5	Developments contrary to EA advice, flood zone		0	0	0	
6	Affordable housing		✓✓	✓✓	✓✓	Delivery of affordable housing through requirement
7	Public transport access, services		0	0	0	
8	Crime		0	0	0	
9	Noise and light impacts		0	0	0	
10	Natural greenspace		0	0	0	
11	Renewable & low carbon development		0	0	0	
12	SSSI quality, impact on species, networks		0	0	0	
13	PDL		0	0	0	
14	River quality, run off		0	0	0	
15	Buildings at risk		0	0	0	

The SA considers this approach to be more sustainable than concentrating all development in one settlement and limiting development to Stafford, Stone and one or more principal settlements. There are several uncertain or negative effects however these could be addressed through policy wording. It is recognised that this option would help meet more needs of the rural area. Development to cross border settlements will need to make sure the openness of the Green Belt is not affected.

## Policy Choice 7: A blanket 30% affordable housing policy approach

# Appraisal of Strategic Policy Choices

<b>Policy Choice 7: A blanket 30% affordable housing policy approach</b>	
16	Household change
17	Attitude to area
18	Compliance with SCI, public engagement
19	Voluntary organisations
20	Wellbeing

**Policy Choice 8: Affordable housing requirement based on area specific targets based on the evidence contained in the affordable housing viability assessment**

SA Obj	Indicators	Effects over time			Comments
		Short	Medium	Long term	
1	Employment rate	0	0	0	
2	Employment land	0	0	0	
3	Vacant units	0	0	0	
4	Farm diversification, affordable housing	√	√	√	Delivery of affordable housing in line with viability which is higher in rural areas
5	Developments contrary to EA advice, flood zone	0	0	0	
6	Affordable housing	√√	√√	√√	Delivery of affordable housing through requirement
7	Public transport access, services	0	0	0	
8	Crime	?	?	?	
9	Noise and light impacts	0	0	0	
10	Natural greenspace	0	0	0	
11	Renewable & low carbon development	0	0	0	
12	SSSI quality, impact on species, networks	0	0	0	
13	PDL	0	0	0	
14	River quality, run off	0	0	0	
15	Buildings at risk	0	0	0	

# Appraisal of Strategic Policy Choices

<b>Policy Choice 8: Affordable housing requirement based on area specific targets based on the evidence contained in the affordable housing viability assessment</b>	
16	Household change
17	Attitude to area
18	Compliance with SCI, public engagement
19	Voluntary organisations
20	Wellbeing

The SA highlights there will be many neutral effects from implementing an affordable housing policy. Whilst the SA shows similar results for both policy choices it is considered that the option of using viability of different areas would be more sustainable as this could lead to a higher delivery of affordable housing, particularly in areas which are more viable which according to the evidence base are the rural settlements. It would be appropriate for any policy to state at least 30% of developments to be affordable but where an independent viability assessment shows otherwise - either increased or decreased viability the threshold is negotiated.

## **Policy Choice 9: A criteria based policy to guide where new development could take place using criteria**

SA Obj	Indicators	Effects over time			Comments
		Short	Medium	Long term	
1	Employment rate	✓	✓	✓	Policy would also apply to employment development applications
2	Employment land	✓	✓	✓	Policy would allow employment land but would limit the size which may impact on employment in the rural area
3	Vacant units	✓	✓	✓	The policy will allow development which would assist with the viability and vitality of settlements. It could be made stronger by specifically referencing vacant land or pdl
4	Farm diversification, affordable housing	✓	✓	✓	Policy could be used to assess schemes for farm diversification and local housing
5	Developments contrary to EA advice, flood zone	✓	✓	✓	Policy adequately addresses flooding and impact on flooding
6	Affordable housing	✓	✓	✓	Policy would allow development across all settlements which meet the criteria. However there may be local housing needs in other locations which would not meet all criteria
7	Public transport access, services	✓	✓	✓	Policy adequately addresses access to services, facilities and public transport
8	Crime	?	?	?	Depends on design
9	Noise and light impacts	✓	✓	✓	Consider that the policy through criteria relating to landscape, characterisation would help assist with noise and light impacts

# Appraisal of Strategic Policy Choices

<b>Policy Choice 9: A criteria based policy to guide where new development could take place using criteria</b>						
10	Natural greenspace	✓	✓	✓	✓	✓
11	Renewable & low carbon development	✓	✓	✓	✓	✓
12	SSSI quality, impact on species, networks	✓	✓	✓	✓	The policy aims to provide development in sustainable locations and reduce travel. There may be opportunities for low carbon networks which should be encouraged through the policy
13	PDL	x	x	x	x	The policy could be improved to contain a criteria favouring sites which are vacant or previously developed
14	River quality, run off	✓	✓	✓	✓	Consider the policy addresses issue under infrastructure consideration
15	Buildings at risk	✓	✓	✓	✓	The policy places importance on landscape character and local historic character along with open space and nature conservation. Also the policy specifies a proportionate criteria which would stop large developments, and could have a negative impact on a settlement character
16	Household change	✓	✓	✓	✓	Policy would allow development of a proportionate scale for all settlements – this could assist with meeting local housing and employment needs
17	Attitude to area	?	?	?	?	
18	Compliance with SCI, public engagement	?	?	?	?	The policy should consider consultation or discussion with local community
19	Voluntary organisations	?	?	?	?	
20	Wellbeing	✓	✓	✓	✓	The policy aims to allow development of suitable scale that has considered and been designed to reduce impact – this should assist wellbeing but will depend on how and when applications come forward
Overall this policy addresses a range of factors with many positive effects being identified within the SA. However it is considered the criteria could be amended to reflect the assessment with particular include a preference for previously developed or vacant land, consultation with the local community, enhancement of green network and green links and maximises opportunities for a low carbon network where there are opportunities.						

## **Policy Choice 10: Establish the principle of Residential Development Boundaries to identify where new development can take place**

SA Obj	Indicators	Effects over time			Comments
		Short	Medium	Long term	
1	Employment rate	?	✓	✓	Policy would also apply to employment development applications
2	Employment land	?	✓	✓	Policy would allow employment land but would limit the size which may impact on employment in the rural area
3	Vacant units	✓	✓	✓	The policy will allow development which would assist with the viability and vitality of settlements. It could be made stronger by specifically referencing vacant land or pdl
4	Farm diversification, affordable housing	?	✓	✓	Policy could be used to assess schemes for farm diversification and local housing
5	Developments contrary to EA advice, flood zone	✓	✓	✓	Policy adequately addresses flooding and impact on flooding

# Appraisal of Strategic Policy Choices

<b>Policy Choice 10: Establish the principle of Residential Development Boundaries to identify where new development can take place</b>					
6	Affordable housing	?	✓	✓	✓
7	Public transport access, services	✓	✓	✓	✓
8	Crime	?	?	?	Depends on design
9	Noise and light impacts	✓	✓	✓	Consider that the policy through criteria relating to landscape, characterisation would help assist with noise and light impacts
10	Natural greenspace	✓	✓	✓	Policy aims to protect important local open space. There may be other local space that is used which is not designated
11	Renewable & low carbon development	✓	✓	✓	The policy aims to provide development in sustainable locations and reduce travel. There may be opportunities for low carbon networks which should be encouraged through the policy
12	SSSI quality, impact on species, networks	✓	✓	✓	Policy aims to protect open space, protected sites and nature conservation and biodiversity sites. This policy could result in a number of developments on the edge of settlements and so green networks and links should also be protected and enhanced
13	PDL	x	x	x	The policy could be improved to contain a criteria favouring sites which are vacant or previously developed
14	River quality, run off	✓	✓	✓	Consider the policy addresses issue under infrastructure consideration
15	Buildings at risk	✓	✓	✓	The policy places importance on landscape character and local historic character along with open space and nature conservation. Also the policy specifies a proportionate criteria which would stop large developments, and could have a negative impact on a settlement character
16	Household change	✓	✓	✓	Policy would allow development of a proportionate scale for all settlements – this could assist with meeting local housing and employment needs
17	Attitude to area	?	?	?	
18	Compliance with SCI, public engagement	?	?	?	The policy should consider consultation or discussion with local community
19	Voluntary organisations	?	?	?	
20	Wellbeing	✓	✓	✓	The policy aims to allow development of suitable scale that has considered and been designed to reduce impact – this should assist wellbeing but will depend on how and when applications come forward
Whilst this option would provide certainty in the medium and long term to local residents, developers and businesses within the Borough regarding where development is more suitable, it could take time for boundaries to be redrawn, which could have some negative effects to delivery in the short term. It is assumed that the criteria used for the previous policy option is used however it is recommended that the following criteria is incorporated:					
<ul style="list-style-type: none"> <li>• Vacant sites or previously developed sites</li> <li>• Be drawn in a way which continues to allow infill where appropriate</li> <li>• The boundary does not include any nature conservation site, or area identified as most sensitive in landscape work and also considers habitat features such as woodland, pools and ponds, hedgerows, green network, open space</li> <li>• Any amendments are in line with the strategy and proportionate to the settlement or employment area</li> </ul>					

# Appraisal of Strategic Policy Choices

**Policy Choice 10: Establish the principle of Residential Development Boundaries to identify where new development can take place**

- Is redrawn to included any development which has occurred since the boundary was originally adopted in 1998 in order to ensure consistent use of development management policies
- The boundary does not include any area within the flood plain or area of known drainage or surface water issues
- Is on the edge of the existing settlement or area – i.e does not create large gaps in built up area
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## Habitat Regulations Assessment

### Habitat Regulations Assessment

All policy choices will need to consider impacts on European Sites under the Habitat Regulations Assessment.

Stafford Borough Council, in partnership with Cannock Chase District Council, South Staffordshire District Council and Lichfield District Council have carried out the first stage of the Habitat Regulations Assessment process, the screening report, in relation to possible impacts on Cannock Chase Special Area of Conservation (SAC). The report stated that it is not certain at this stage to confirm that the individual authorities plans, in combination with other plans and projects will not have a negative impact on the Cannock Chase SAC. In particular, the following possible negative impacts were identified:

- Air quality
- Recreational pressure
- Water quality

A more detailed assessment, looking at these possible impacts and potential mitigation measures is currently being progressed and the outcome will be reported in revised SA report, expected alongside The Plan for Stafford Borough - Publication document later in 2012.

A separate screening report to investigate possible impacts on the following Natura 2000 sites is currently being progressed and the outcome will also be reported in the revised SA report:

- Chartley Moss SAC
- Pasturefields Salt Marsh SAC
- Cop Mere Ramsar
- Aqualate Mere Ramsar
- Mottey Meadows SAC

### Strategic Flood Risk Assessment

Previous national planning policy in Planning Policy Statement 25 (PPS25) Development and Flood Risk, stated that the Sustainability Appraisal of Local Development Documents should incorporate or reflect the planning authority's Strategic Flood Risk Assessment (SFRA), to ensure that the planning strategies for the area support the Government's objectives for development and flood risk. In March 2012 the Government published the National Planning Policy Framework and specific guidance on flood risk maintains this approach.

Stafford Borough appointed consultants to carry out a joint SFRA with several authorities within Staffordshire. Whilst the results of the assessment have been reported in a separate document. This information has been used when assessing policy and strategic location development options through the Sustainability Appraisal process. The revised Sustainability Appraisal Report will contain information regarding the sequential test in respect of strategic site allocations.

## Evidence Base

Where appropriate information from the Plan for Stafford Borough evidence base has been drawn on to assist with the appraisal process:

- **Housing**

- [The Housing Monitor: Land for New Homes](#)
- [North Housing Market Area Gypsy and Traveller Accommodation Needs Assessment](#)
- [Strategic Housing Land Availability Assessment \(SHLAA\)](#)
- [Housing Market Areas Assessment](#)
- [5 Year Housing Land Supply Statement](#)

### Employment and the Economy

- [Employment Land Review](#)
- [National Land Use Database \(Homes and Communities Agency website\)](#)

### Retail and Town Centres

- [Town Centre Capacity Assessment \(Retail, Office and Leisure\) and appendices](#)
- [Stafford Town Centre Study 2000](#)

### Community

- [Settlement Assessment of Services and Facilities](#)
- [Key Stakeholder Discussions: Parish Meetings](#)

### Transport

- [Local Transport Plan 2006 - 2011](#)

### Climate Change

- [The Strategic flood-risk assessment \(SFRA\) Prepared jointly alongside Lichfield District Council, Staffordshire Moorlands District Council and Tamworth Borough Council](#)
- [Water Cycle Study and Surface Water Management Plan](#)
- [Renewable Energy Study](#)

### Tourism, leisure & recreation

- [Planning Policy Guidance Note 17 \(PPG17\) 'Planning for Open Space, Sport and Recreation' Assessment](#)

### Environment & landscape

- [Green Infrastructure Strategy](#)
- [Landscape and Countryside Character Assessment](#)
- [Habitats Regulations Assessment \(Appropriate Assessment\)](#)
- [Stafford Borough Local Development Framework Ecological Desk Study 2008](#)
- [Cannock Chase AONB Management Plan](#)
- [Staffordshire Biodiversity Action Plan](#)

### Historic Environment

- [Historic Environment Character Assessment for Stafford Town \(April 2009\)](#)
- [Historic Environment Character Assessment for Stone \(July 2009\)](#)
- [Historic Environment Character Assessment for Haywoods \(July 2009\)](#)
- [Historic Environment Character Assessment for Eccleshall \(August 2009\)](#)
- [Historic Environment Character Assessment for Gnosall \(August 2009\)](#)
- [Stafford Town Centre Conservation Area Appraisal](#)
- [Stone Conservation Area Appraisal](#)

## Evidence Base

### Infrastructure

- [Stafford Borough Infrastructure Strategy: Stage 1 Final Report \(July 2009\)](#)
- [Key Stakeholder Discussions: Statutory Agencies & Utilities](#)
- [Water Cycle Study and Surface Water Management Plan](#)

### Other

- [Annual Monitoring Report](#)
- [Census Information](#) - Local information and data on Stafford Borough from the 2001 Census

## List of consultees

### List of consultees

The following organisations and individuals responded to the Sustainability Appraisal Scoping Report:

- Sport Across Staffordshire and Stoke-on-Trent
- Mr T Midgeley
- Advantage West Midlands
- Local Agenda 21, Stafford Borough Council
- Natural England
- Environment Agency
- Stafford Gospel Hall Trust
- English Heritage

The following organisations and individuals responded to the Sustainability Appraisal Commentary Volume 1:

- English Heritage
- Mr J Eld
- Centro
- Government Office for the West Midlands
- CAMRA
- The Environment Agency

The following organisations and individuals responded to the Sustainability Appraisal Commentary Volume 2:

- Environment Agency
- Mrs L von Elbing
- Mr S Mellenchip
- Eccleshall Parish Council
- Mrs A Vaughan
- Evans, Stott & Boote Families, c/o First City Ltd
- Mr B B Apps
- Ms A Margetson

The following organisations and individuals responded to the Sustainability Appraisal Report:

- Environment Agency
- Natural England

Details of the responses to SA documents can be found on the consultation homepage