

Responses and Officer Comments to Sustainability Appraisal Scoping Report

General Comments	
Natural England	<p>Natural England have been consulted on the Sustainability Appraisal for the Plan for Stafford previously and would refer you to our previous comments. In addition we note that comments in the Appraisal of Strategic Policy Choices table regarding indicator 12 state that “There are sufficient sites outside of designated areas for this level of development”. We would like to remind you of the potential for impacts from outside of designated sites, including indirect impacts such as those referred to above concerning recreational pressures on Cannock Chase SAC.</p>
Change made to Sustainability Appraisal	<p>Comments noted and agreed. Revised Sustainability Appraisal to include commentary on the potential indirect impacts on designated sites. The analysis of the Visitor Survey for Cannock Chase is near completion and this will be used to assist with this.</p>
Environment Agency	<p>Having reviewed the document <i>Strategic Policy Choices: Sustainability Appraisal</i> we are pleased to see that this view on level of growth is reflected within the assessment, and it is acknowledged that having adequate policies in place is key to ensuring there are no detrimental impacts on the water environment, and that flood risk will pose no risk to development (Policy Choices 1-3 on scale of growth, SA Objs 5 &14).</p> <p>The impacts of SA Objectives 5 &14 are also correctly assessed under each of the locational Policy Choices 4-6. The Environment Agency has no comments to make on the Policy Choices 7-10.</p> <p>With regards to the indicators and targets, we question whether the indicators for Sustainability Objective 12 should be reworded to clarify that only <i>detrimental</i> impacts on biodiversity conservation should be minimised. Is it possible that some impacts from development could be beneficial, given that this objective is to protect and enhance biodiversity value?</p> <p>Sustainability Objective 14, the first indicator is to minimise the number of developments that “<i>increase water consumption or pollution</i>”. How do you define an increase in water consumption - does this refer to the amount of water used per dwelling on average across the borough? Because if new development is built unless it relies solely on harvested rainwater it will increase the use of water.</p> <p>We welcome the inclusion of Water Framework Directive targets as part of this objective, however, recommend as previously that this is also reflected in Sustainability Objective 12, as the ecology of waterbodies is a key factor when determining success under the WFD, as ecological value is closely linked to the water quantity and quality of a river.</p>
Change made to	<p>Comments noted. Indicators under Sustainability Objective 12 reworded to include word ‘detrimental’. Agree that</p>

Sustainability Appraisal	<p>some impacts from development could lead to an improvement in terms of biodiversity, habitat creation and green infrastructure links.</p> <p>Comment regarding water consumption noted. Intended that this related to efforts made to reduce water consumption along with energy efficiency compared with developments where no reductions have been incorporated. This to be made clearer in the indicator</p> <p>Comments agreed – Water Framework Target also incorporated under Sustainability Objective 12.</p>
Non-technical Summary	
Councillor George Meddings	<p>I understand we have to treat our earth with respect for the good of all of us and most important future generations to follow but i cannot understand why you keep refusing planning apps for small villages as you are killing off village life as we once knew it, they are becoming retirement areas or as one observative person described our village Stowe by Chartley (gods waiting room)</p> <p>No we do not want a housing estate in these villages but small growth is vital for us to stay active and sustainable as over the years we have lost our school, post office and shop leaving one pub the church and village hall, all three are having to work extremely hard to exist and without a small increase in population all three will be history in the future.</p> <p>I have had an active roll with the village for the last twenty years now as a parish Councillor and village hall committee member, the comments i have made are supported by the majority of Stowe by Chartley Parish Council and the residents.</p>
Change made to Sustainability Appraisal documents	<p>Comments noted. The criteria based option in the Strategic Policy Choices document would allow small scale growth in villages such as Stowe by Chartley. The final policy will be assessed in the Revised Sustainability Appraisal. The Sustainability process has acknowledged that development only in larger settlements would not been local need in small rural communities.</p>
Mrs Vanessa Darlington	<p>In relation to the siting of new development in Stone I have read with interest the WYG Planning and Design options appraisal that suggests the need for a new supermarket in Stone to meet supposed over capacity of Morrisons by 2015. I am dismayed that the options appraisal exercise has only put one site forward this being Westbridge Park that would require the demolition and re-siting of Westbridge Gym, the Scout hut and childrens play area. There is no mention of the football pitches or fact that this green open space is the ONLY area in the Town suitable for hosting large community events. The option appraisal makes no mention that this site hosts Stone Carnival, Stone Bonfire, the annual raft race, dog show and car boot, Westbridge 5k Race, the Steeplechase, annual Scout parade</p>

	<p>etc - the potential allocation of this site for retail/ foodstore is not just about being able to relocate existing 'buildings' on the site! it's re-allocation would rip the heart out of Stone.</p> <p>I disagree that Westbridge Park is the only opportunity available in close proximity to the Town that could accommodate a new supermarket (Tesco) post 2015. It is a known fact that most people travelling to the supermarket travel by car therefore sites slightly further afield should have been looked at. The deciding criteria for any new supermarket should not be that it is within walking distance of Stone High Street as this need is already met through Morrisons, the Co-operative and various independent retailers in Stone High Street including bakers and the fruit & vegetable store.</p> <p>Other sites that should be fully investigate for a potential supermarket should include:</p> <ol style="list-style-type: none"> 1/ Green field land off the A34 before entering the roundabout to the Whitebridge Estate between the canal and A34 2/ Land adjacent to Aston Marina 3/ Newcastle Street the Council Area Highways Office & Depot combined with the Tennis Courts (these could be located to Westbridge Park as part of a S106 deal) 4/ Green field Land on the Eccleshall Road past Walton 5/ Land next the cricket club on Uttoxeter Road <p>The majority of these sites would be greenfield development but I believe far more acceptable to the people of Stone than the loss of the open land at Westbridge Park that is used for so many community events attracting audiences up to 10,000 people. Westbridge Park is the centre of Stone for Community events.</p>
Change made to Sustainability Appraisal documents	Comments noted. The Strategic Policy Choices does not contain information relating to retail development in the Borough. Various town centre options had been considered previously in the Issues and Options document and the town centre boundary considered in the Draft Publication. Should a site be allocated in the plan, this will be appraised in the Revised Sustainability Appraisal Report.
1.1 Paragraph	
Mr Francis Biard	mention of NPPF. Ministerial Foreword & paras; 6 - 10. might help as well.
Change made to Sustainability Appraisal documents	Agreed. Definition of Sustainable Development from the NPPF to be included in these opening sentences.
2.12 paragraph	
MR DAVID TURNER	IN STONE, CHRISTCHURCH WAY IS ALREADY A PROBLEM AREA FOR BOTH PREDESTRIANS AND

	<p>TRAFFIC.YOUR PROPOSALS ON ADDITIONAL HOUSING AND INDUSTRIAL DEVELOPMENT WILL ONLY ENCOURAGE MORE THROUGHPUT IN THE TOWN CENTRE. WHERE IS THE SUSTAINABILITY OF LEAVING STONE AS IT IS ,WHEN 500 NEW HOUSES ARE PROPOSED AT WALTON ON THE HILL?</p> <p>STONE IS A COMMUTOR MARKET TOWN AS EMPLOYMENT IS CURRENTLY SPARSE, WITH TOO MANY HOUSES AT PRESENT. THEREFORE, THE DEVELOPMENT OF STONE BUSINESS PARK TOGETHER WITH NEW HOMES IS LEAVING STONE IN A STATUS QUO POSITION.</p> <p>A DOWNGRADED HOSPITAL IN STAFFORD IS A PROBLEM FOR PATIENTS IN ITS SURROUNDING CONURBATION , A SITUATION THAT NEEDS SORTING OUT WITH THE PRESENT HOUSING AND INDUSTRIAL STOCK WITHOUT ADDING MORE EXPONENTIAL PROBLEMS. ENTRY ON BEHALF OF THREE DISGRUNTLED STAFFORD AND STONE RESIDENTS.</p>
Change made to Sustainability Appraisal documents	Comments noted, no change to the Sustainability Appraisal process.
3.25 Paragraph	
Mr Francis Biard	<p>Given Objective 15; " To protect, enhance and, where necessary, restore designated landscape areas and town character, scenic beauty, local distinctiveness, historic and cultural character. " This paragraph would benefit from being expanded to cover the historic built environment, Conservation Areas, Listed Buildings, Archeological sites and features as well as general and historic landscape character of the whole of the Borough. All of these features are documented. They provide the Borough with its unique and local character which needs to adapt to future changes and pressures and be protected and enhanced.</p> <p>A specific environmental issue of the protection, adaptation and exploitation of this resource could then be identified in the summary box below.</p>
Change made to Sustainability Appraisal documents	Comments agreed. Further explanation on the different heritage assets, which are considered part of the historic environment, included along with adding the protection and adaptation as a key environmental issue.
4.1 Paragraph	
Mr Michael Smith	4. This is to be supported with the express exception of wind turbine projects. Energy companies are actively and aggressively seeking to recruit farmers to host wind turbines with lucrative financial packages (subsidised by the tax payer). These projects are based upon farms becoming "power stations". In doing so they ruin a beautiful landscape which is a real asset to Staffordshire.

	<p>11. This is to be supported with the express exception of wind turbine projects. There is a variety of alternative means of generating renewable energy, including solar panels and biomass, etc.</p> <p>12. Wind turbines are a danger to the biodiversity of an area causing danger to nesting birds, bats etc. Wind turbines change the features of the entire landscape for the worse.</p> <p>15. Wind turbines ruin the "scenic beauty" of the Staffordshire countryside which is an asset to the County and Stafford Borough. Given that the area already suffers from the environmental impact of the M6 Motorway any further infrastructure blight on the landscape of this nature should be resisted. Wind turbines are not harmonious with the openness of our beautiful countryside.</p> <p>18. A borough wide policy against wind turbines would create certainty and comfort for residents of the Borough. At the moment, there are several proposals for turbines, arising out of the aggressive marketing efforts of the energy companies. This is creating widespread upset and concern across the borough as small groups of local residents with little or no experience of the planning system try to counteract the steamroller approach of businesses with expert planning lawyers who have successfully obtained permission for turbines elsewhere. The balance is wrong, and we understand that the Localism Bill was brought in to assist local residents to protect their environment from such unwanted developments.</p> <p>20. The prospect of a wind turbine in your back yard has a serious negative impact on well-being. There are numerous concerns of health, the environment, the impact on property values. In addition the prospect of a lengthy, difficult and stressful period of fighting a planning application puts a lot of stress and strain on local residents who have to quickly get to grips with a very difficult situation. Overall, within the framework of these objectives, Stafford Borough Council should seek to support its many rural residents and protect its future as a tourist destination by considering a borough wide strategic policy ban on wind turbine projects, whilst encouraging other forms of renewable energy which do not have a negative effect on the borough's Precious skyline.</p>
<p>Change made to Sustainability Appraisal documents</p>	<p>Comments noted, no change proposed to the Sustainability Appraisal process. The Strategic Policy Choices document does not specifically mention location or scale of wind turbines. The policy that will be used to assess such impacts will be appraised in the Revised Sustainability Appraisal, which will consider whether it adequately addresses potential environmental and social impacts of renewable energy schemes.</p>

<p>Angela Murphy</p>	<p>4. This is to be supported with the express exception of wind turbine projects. Energy companies are actively and aggressively seeking to recruit farmers to host wind turbines with lucrative financial packages (subsidised by the tax payer). These projects are based upon farms becoming "power stations". In doing so they ruin a beautiful landscape which is a real asset to Staffordshire.</p> <p>11. This is to be supported with the express exception of wind turbine projects. There is a variety of alternative means of generating renewable energy, including solar panels and biomass, etc.</p> <p>12. Wind turbines are a danger to the biodiversity of an area causing danger to nesting birds, bats etc. Wind turbines change the features of the entire landscape for the worse.</p> <p>15. Wind turbines ruin the "scenic beauty" of the Staffordshire countryside which is an asset to the County and Stafford Borough. Given that the area already suffers from the environmental impact of the M6 Motorway any further infrastructure blight on the landscape of this nature should be resisted. Wind turbines are not harmonious with the openness of our beautiful countryside.</p> <p>18. A borough wide policy against wind turbines would create certainty and comfort for residents of the Borough. At the moment, there are several proposals for turbines, arising out of the aggressive marketing efforts of the energy companies. This is creating widespread upset and concern across the borough as small groups of local residents with little of no experience of the planning system try to counteract the steamroller approach of businesses with expert planning lawyers who have successfully obtained permission for turbines elsewhere. The balance is wrong, and we understand that the Localism Bill was brought in to assist local residents to protect their environment from such unwanted developments.</p> <p>20. The prospect of a wind turbine in your back yard has a serious negative impact on well-being. There are numerous concerns of health, the environment, the impact on property values. In addition the prospect of a lengthy, difficult and stressful period of fighting a planning application puts a lot of stress and strain on local residents who have to quickly get to grips with a very difficult situation.</p> <p>Overall, within the framework of these objectives, Stafford Borough Council should seek to support its many rural residents and protect its future as a tourist destination by considering a borough wide strategic policy ban on wind turbine projects, whilst encouraging other forms of renewable energy which do not have a negative effect on the borough's Precious skyline.</p>
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<p>Mr Francis Biard</p>	<p>The Sustainability Objectives are the key to assessing the strategy and policies of the plan. While the sustainability issues have been identified in section three, there is little in this document to explain why the 20 Sustainability Objectives in the table have been selected and whether there are differences in their importance. The Sustainability Objectives are critical in the plan process yet seem to have little justification set out.</p>

<p>Change made to Sustainability Appraisal documents</p>	<p>Comments noted. The Sustainability Objectives were first set out in the Scoping Report September 2007. There have been amendments to the indicators and decision-making criteria as a result of consultations on Sustainability appraisal documents since then.</p>
<p>Mr C J Leather</p>	<p>4. This is to be supported with the exception development that are overpowering to the rural community and surrounds such as wind turbine projects. Energy companies are actively and aggressively seeking to recruit farmers to host wind turbines with lucrative financial packages (subsidised by the tax payer). These projects are based upon farms becoming "industrial units" and in doing so contravene the use of land for agriculture. They do not represent rural diversification but outright commercial development. They ruin a beautiful landscape which is a real asset to Staffordshire. The local rural economy includes tourism and uses such as Farmhouse Bed and Breakfast which will all be adversely effected by industrial sized development in the countryside.</p> <p>11. This is to be supported but taking into account the carbon footprint for wind energy being greater than the saving it should be with the express exception of wind turbine projects. There is a variety of alternative means of generating renewable energy, including solar panels and biomass, etc.</p> <p>12. Wind turbines are a danger to the biodiversity of an area causing danger to nesting birds, bats and some mammals etc. Wind turbines change the features of the entire landscape for the worse.</p> <p>15. Wind turbines ruin the "scenic beauty" of the Staffordshire countryside which is an asset to the County and the Stafford Borough. Given that the area already suffers from the environmental impact of the M6 Motorway any further infrastructure blight on the landscape of this nature should be resisted. The heritage of the area must be protected and any form of development that will physically or visually effect grade 1 and grade 2* listed buildings and their historic settings should be rejected. Wind turbines are not harmonious with the openness of our beautiful countryside.</p> <p>18. A borough wide policy against wind turbines would create certainty and comfort for residents of the Borough. At the moment, there are several proposals for turbines, arising out of the aggressive marketing efforts of the energy companies. This is creating widespread upset and concern across the borough as small groups of local residents with little of no experience of the planning system try to counteract the steamroller approach of businesses with expert planning lawyers who have successfully obtained permission for turbines elsewhere. The balance is wrong, and we understand that the Localism Bill was brought in to assist local residents to protect their environment from such unwanted developments.</p> <p>20. The prospect of a wind turbine in your back yard has a serious negative impact on well-being. There are numerous concerns of health, the environment, the impact on property values. In addition the prospect of a lengthy, difficult and stressful period of fighting a planning application puts a lot of stress and strain on local residents who have to quickly get to grips with a very difficult situation. Overall, within the framework of these objectives, Stafford Borough Council should seek to support its many rural residents and protect its future as a tourist destination by considering a borough wide strategic policy ban on wind turbine projects, whilst encouraging other forms of renewable energy which do not have a negative effect on the borough's precious, and at present, unspoilt landscape and skyline.</p>

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Mr Mike Tweed	<p>4. This is to be supported with the express exception of wind turbine projects. Energy companies are actively and aggressively seeking to recruit farmers to host wind turbines with lucrative financial packages (subsidised by the tax payer). These projects are based upon farms becoming "power stations". In doing so they ruin a beautiful landscape which is a real asset to Staffordshire.</p> <p>11. This is to be supported with the express exception of wind turbine projects. There is a variety of alternative means of generating renewable energy, including solar panels and biomass, etc.</p> <p>12. Wind turbines are a danger to the biodiversity of an area causing danger to nesting birds, bats etc. Wind turbines change the features of the entire landscape for the worse.</p> <p>15. Wind turbines ruin the "scenic beauty" of the Staffordshire countryside which is an asset to the County and Stafford Borough. Given that the area already suffers from the environmental impact of the M6 Motorway any further infrastructure blight on the landscape of this nature should be resisted. Wind turbines are not harmonious with the openness of our beautiful countryside.</p> <p>18. A borough wide policy against wind turbines would create certainty and comfort for residents of the Borough. At the moment, there are several proposals for turbines, arising out of the aggressive marketing efforts of the energy companies. This is creating widespread upset and concern across the borough as small groups of local residents with little of no experience of the planning system try to counteract the steamroller approach of businesses with expert planning lawyers who have successfully obtained permission for turbines elsewhere. The balance is wrong, and we understand that the Localism Bill was brought in to assist local residents to protect their environment from such unwanted developments.</p> <p>20. The prospect of a wind turbine in your back yard has a serious negative impact on well-being. There are numerous concerns of health, the environment, the impact on property values. In addition the prospect of a lengthy, difficult and stressful period of fighting a planning application puts a lot of stress and strain on local residents who have to quickly get to grips with a very difficult situation. Overall, within the framework of these objectives, Stafford Borough Council should seek to support its many rural residents and protect its future as a tourist destination by considering a borough wide strategic policy ban on wind turbine projects, whilst encouraging other forms of renewable energy which do not have a negative effect on the borough's Precious skyline.</p>
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Mr and Mrs Bramall	<p>4. This is to be supported with the express exception of wind turbine projects. Energy companies are actively and aggressively seeking to recruit farmers to host wind turbines with lucrative financial packages (subsidised by the tax payer). These projects are based upon farms becoming "power stations". In doing so they ruin a beautiful landscape which is a real asset to Staffordshire.</p> <p>11. This is to be supported with the express exception of wind turbine projects. There is a variety of alternative means of generating renewable energy, including solar panels and biomass, etc.</p> <p>12. Wind turbines are a danger to the biodiversity of an area causing danger to nesting birds, bats etc. Wind turbines change the features of the entire landscape for the worse.</p> <p>15. Wind turbines ruin the "scenic beauty" of the Staffordshire countryside which is an asset to the County and Stafford Borough. Given that the area already suffers from the environmental impact of the M6 Motorway any further infrastructure blight on the landscape of this nature should be resisted. Wind turbines are not harmonious with the openness of our beautiful countryside.</p> <p>18. A borough wide policy against wind turbines would create certainty and comfort for residents of the Borough. At the moment, there are several proposals for turbines, arising out of the aggressive marketing efforts of the energy companies. This is creating widespread upset and concern across the borough as small groups of local residents with little of no experience of the planning system try to counteract the steamroller approach of businesses with expert planning lawyers who have successfully obtained permission for turbines elsewhere. The balance is wrong, and we understand that the Localism Bill was brought in to assist local residents to protect their environment from such unwanted developments.</p> <p>20. The prospect of a wind turbine in your back yard has a serious negative impact on well-being. There are numerous concerns of health, the environment, the impact on property values. In addition the prospect of a lengthy, difficult and stressful period of fighting a planning application puts a lot of stress and strain on local residents who have to quickly get to grips with a very difficult situation.</p> <p>Overall, within the framework of these objectives, Stafford Borough Council should seek to support its many rural residents and protect its future as a tourist destination by considering a borough wide strategic policy ban on wind turbine projects, whilst encouraging other forms of renewable energy which do not have a negative effect on the borough's Precious skyline.</p>
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<p>Tina Thatcher</p>	<p>4. This is to be supported with the express exception of wind turbine projects. Energy companies are actively and aggressively seeking to recruit farmers to host wind turbines with lucrative financial packages (subsidised by the tax payer). These projects are based upon farms becoming "power stations". In doing so they ruin a beautiful landscape which is a real asset to Staffordshire.</p> <p>11. This is to be supported with the express exception of wind turbine projects. There is a variety of alternative means of generating renewable energy, including solar panels and biomass, etc.</p> <p>12. Wind turbines are a danger to the biodiversity of an area causing danger to nesting birds, bats etc. Wind turbines change the features of the entire landscape for the worse.</p> <p>15. Wind turbines ruin the "scenic beauty" of the Staffordshire countryside which is an asset to the County and Stafford Borough. Given that the area already suffers from the environmental impact of the M6 Motorway any further infrastructure blight on the landscape of this nature should be resisted. Wind turbines are not harmonious with the openness of our beautiful countryside.</p> <p>18. A borough wide policy against wind turbines would create certainty and comfort for residents of the Borough. At the moment, there are several proposals for turbines, arising out of the aggressive marketing efforts of the energy companies. This is creating widespread upset and concern across the borough as small groups of local residents with little of no experience of the planning system try to counteract the steamroller approach of businesses with expert planning lawyers who have successfully obtained permission for turbines elsewhere. The balance is wrong, and we understand that the Localism Bill was brought in to assist local residents to protect their environment from such unwanted developments.</p> <p>20. The prospect of a wind turbine in your back yard has a serious negative impact on well-being. There are numerous concerns of health, the environment, the impact on property values. In addition the prospect of a lengthy, difficult and stressful period of fighting a planning application puts a lot of stress and strain on local residents who have to quickly get to grips with a very difficult situation.</p> <p>Overall, within the framework of these objectives, Stafford Borough Council should seek to support its many rural residents and protect its future as a tourist destination by considering a borough wide strategic policy ban on wind turbine projects, whilst encouraging other forms of renewable energy which do not have a negative effect on the borough's Precious skyline.</p>
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<p>5.4 Paragraph</p>	

Mr Francis Biard	<p>The summary of this appraisal begins " Whilst the SA shows similar results for both policy choices..." What then follows is a justification for the choice of approach taken. That choice is not predicated by the appraisal, it is a subsequent value judgement and that is not made clear.</p> <p>The danger is that the argument that the course taken is because the appraisal showed it was more sustainable is actually not true. Sustainability is open to much interpretation and a lot of the words in section 5 in particular do not seem to acknowledge this. It came out top in the test so its the way to go is the simplistic way the process could be abused.</p>
Change made to Sustainability Appraisal documents	<p>There were two options for the delivery of affordable housing. The first requiring all developments to provide 30% of developments as affordable housing. The second is to provide area specific target based on viability of that area. The information provided in the evidence shows that some areas viability would allow a higher level of affordable housing to be delivered without a negative impact on profitability of the development. The Sustainability Appraisal, as set out in the table in the appendices, whilst showing a similar appraisal of both options considers that more affordable housing would be delivered with the second option.</p>
Habitat Regulations Assessment	
Natural England	<p>Natural England advise that the Local Plan will need to be compliant with The Conservation of Habitats & Species Regulations 2010 (the "Habitats Regulations") and therefore an updated Habitats Regulations Assessment ("HRA") will be required with respect to any policy changes. Natural England must be consulted regarding any revisions to the HRA.</p> <p>Natural England retains its statutory discretion to modify its present advice or opinion in view of any and all such additional matters or any additional information related to this consultation that may come to our attention.</p>
Change made to Sustainability Appraisal documents	<p>Agreed. The Habitats Regulations Assessment is currently being prepared and will be made available alongside the Publication plan.</p>