

THE PLAN FOR STAFFORD BOROUGH

EXAMINATION STATEMENT - ISSUE 9: ENVIRONMENT (POLICIES N1-N9)

I write in response to the publication of Schedule of the Inspector's Matters and Issues on 09 September 2013, and can provide clarity on the following issues relating to Policies N1-N9 on the Environment.

9.1 DESIGN, CLIMATE CHANGE AND LOW CARBON SOURCES & RENEWABLE ENERGY (POLICIES N1-N3)

b. How will the criteria and requirements set out in Policy N2 effectively facilitate reduction in the consumption of natural resources, improve environmental quality and mitigate the impact of climate change?

The section on Sustainable Drainage and the proposed Minor Modifications M82-84 will ensure that water discharging from a development site, either via infiltration into the underlying aquifer, into a watercourse or into the mains system will not pose a risk of contamination to the water environment through the introduction of pollutants. It shall also discharge in a manner which will not make flooding worse than existing, as a minimum providing a 20% reduction in runoff rates to allow for the impacts of climate change. Where the Level 2 SWMP identifies specific areas where runoff rates should be reduced further than identified within this policy, this is specified within the policy criteria for the associated SDLs.

These requirements are in line with the recommendations of the local evidence base documents and should help to manage flood risk and move towards compliance with RBMP objectives. It sits alongside Policies N4 and N5 in integrating RBMP implementation into the core policies and decision-making in order that the water environment is improved wherever possible through growth.

9.2 NATURAL ENVIRONMENT & GREEN INFRASTRUCTURE (Policy N4)

a. How will the measures set out in Policy N4 effectively protect, enhance and improve the Borough's natural environment, green infrastructure, biodiversity and landscape, reflecting the views of Natural England and the Environment Agency, and in line with national policy?

Point J ensures that the objectives of the EU Water Framework Directive) will be ensured through the protection and improvement of all aspects of the natural water environment. This is further strengthened through wording improvements under Minor Modification M90 which provide a more local justification by linking to the Severn and Humber River Basin Management Plan, the local WFD delivery vehicles for this area.

Point B and J(ii) ensures that the policy is in keeping with the wider push from national policy and the local flood risk evidence base to ensure SuDS are incorporated into new developments wherever possible. This is supported by the Trent Catchment Flood Management Plan which includes the borough in *Policy Unit 7 – West Staffs*, flagging up that development opportunities provide opportunities to manage increasing flood risk through pulling back from the river and creating a bankside green corridor, particularly through urban areas. Point J(iii) further builds upon this point in ensuring an adequate

development easement is maintained from all watercourses in order to allow for habitat protection and creation and to support the function of the rivers as blue corridors for flood risk management and water-based ecology. The setting back of development from the banks of rivers also allows for essential maintenance works to be undertaken and operational machinery to gain access to the watercourse for flood risk management purposes.

The renaturalisation of waterbodies that may have suffered historically from man-made interference (Point (iv)) is important to the improvement and protection of the water environment and the habitat it supports. Ensuring all waterbodies are as natural as possible and have the ability to support a wide variety of habitats and ecology is essential in meeting the objectives of the RBMPs covering this area. Not only does opening up culverted watercourse allow banks and beds to soften and be exposed to light, it also means pollution is easier to detect and remedy. The proposed modification to point G(ii) also supports this aim.

Main Modification M90 adds a further point (v) that requires evidence to be submitted to ensure that the foul drainage system is adequate to accept the proposed increase in flow without posing a risk to the water environment. This links to Policy requirements in N2 and is based upon the findings of the Water Cycle Study (updated by Severn Trent Water's recommendations for Main Modifications) that identify that additional assessment and improvement of the foul drainage system will be required to support the proposed level of growth within the plan. These works will not hinder the implementation of the plan, however development may need to be delayed in some circumstances to allow for improvement works to take place so the infrastructure is adequate.

An additional point (vi) requires that weirs and other barriers within the river channel are removed, or if not possible fish passes constructed to support migration of fish along the river. Walk-over surveys undertaken by the Environment Agency as part of our investigations into WFD failure have identified this a reason that waterbodies are failing. It is therefore essential that fish passage is improved in order for objectives identified as part of the Severn and Humber RBMPs are able to be met and redevelopment offers this as an opportunity.

9.3 SITES OF EUROPEAN, NATIONAL & LOCAL NATURE CONSERVATION IMPORTANCE (Policy N5)

a. Is the approach to protecting the integrity of sites of nature conservation importance appropriate, effective, justified, reflecting the views of Natural England and consistent with national policy, including the approach to European sites, air and water quality and development mitigation?

Requirements of this policy include and reflect the objectives of the Severn and Humber RBMPs and therefore are mindful of Stafford Borough Council's responsibilities as co-deliverer of the EU Water Framework Directive.

Yours sincerely

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