

Responses and Officer Comments to Sustainability Appraisal Commentary Volume 1

General Comments	
<p>Miss A Smith, English Heritage</p>	<p>SA objective disappointing that still landscape and historic environment</p> <p>All options will also need to consider impacts on the historic environment. This underlines our original recommendations for a discrete SA objective on the historic environment.</p> <p>Further to our comments on the Draft Sustainability Appraisal Report in December 2007, we wish to reiterate the following:</p> <p>It is disappointing that objective 15 still uses a combined approach for landscape and cultural heritage. It is our position that a specific objective for the preservation and enhancement of the historic environment will always be necessary. The current objective is unclear and we again direct you to our recommendations for changes in our letter dated 7 December 2007.</p> <p>In future iterations of the SA it would be helpful if the format of the appraisal tables can be reviewed to make it easier to identify the objectives and options under consideration, and the inclusion of a commentary on the main basis for the assessment score.</p>
<p>Change made to Sustainability Appraisal documents</p>	<p>Detailed decision making criteria have been introduced into the Sustainability Appraisal Commentary Vol2 as a way to better illustrate the appraisal process. Under objective 15, the following questions have been included:</p> <ul style="list-style-type: none"> • Will it protect and enhance sites features and areas of historical, archaeological and cultural value in both urban and rural areas? • Will it improve the quality and character of landscapes and townscapes? • Will it help to conserve historic buildings through sensitive adaptation and re-use? • Will it lead to the retention and enhancement of listed buildings and/or conservation areas? • Will it lead to reduced pressure on the cultural heritage (e.g. archaeology)? • Will it contribute to a quality built environment? <p>It is anticipated that this will draw out specific impacts relating to the preservation and enhancement of the historic</p>

	environment and provided greater depth to the commentary of the basis for the assessment score.
<p>Mrs Sarah Hunt, Government Office for the West Midlands</p>	<p>STAFFORD LDF: STRATEGIC ISSUES & SUSTAINABILITY APPRAISAL</p> <p><u>Rural and biodiversity issues</u> Stafford is classed as "significantly rural". We would therefore expect rural issues to be reflected, and the LDF to be rural proofed.</p> <p>There's recognition of several issues:</p> <ul style="list-style-type: none"> • Housing • Employment • Farm diversification • Economy & communities • Facilities in rural centres – but there could be more about access to services – relevant to sustainable communities, and as an environmental issue. This is possibly covered in the recommendations at ii:10, under "development infrastructure"; but it may need to be spelt out more. • Use of vacant land for employment (sustainability aspects of this would need to be considered) • Staffordshire Biodiversity Action Plan • SSSIs <p><u>Environmental issues</u></p> <ul style="list-style-type: none"> • Climate change is acknowledged as a key sustainability issue, with several issues listed as objectives, indicators and targets • Why is biodiversity given as the SEA topic? • Not very much about reducing carbon dioxide emissions – just the one reference to low-carbon energy • The Sustainability Appraisal makes no mention of waste. Stafford's output of household waste per person is comparatively high. <p><u>The six development options</u></p> <ul style="list-style-type: none"> • The document does not profess to talk about these in more than general terms at this stage, and we expect there to

	<p>be a more detailed assessment in due course</p> <ul style="list-style-type: none"> • This should include fuller justification for identifying options 3 and 4 as the most sustainable, including which aspects of sustainability are covered by that statement.
<p>Change made to Sustainability Appraisal documents</p>	<p>The following are SEA Topics; biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage and landscape. Objective 5 now falls under the SEA Topics Population, Human Health and Material Assets and 11 falls under SEA Topics Air, Population, Human Health and Climatic Factors.</p> <p>It is anticipated that with the addition of detailed decision making criteria, there will be more specific reference to access to services, reduction of carbon dioxide emissions and waste. It is also anticipated that using the detailed decision making criteria, a more detailed assessment and commentary can be made, including which aspects of sustainability are covered in the assessment.</p> <p>Data has been collected from Local Authority Municipal Waste Statistics 2006 / 07 which illustrates the following</p> <ul style="list-style-type: none"> • Stafford Borough has the second highest amount of household waste in Staffordshire and the third highest in terms of household waste per head. • In terms of recycling, whilst 'dry recycling' is the highest in Staffordshire, 'green recycling' is much lower, meaning Stafford Borough has the third lowest rate of recycling and composting in Staffordshire. <p>This information will be carried forward in subsequent SA reports and flagged up as a sustainability issue.</p>
<p>Rachel Bell, Centro-WMPTA</p>	<p>Thank you for consulting Centro-WMPTA on the Stafford Borough Local Development Framework: Sustainability Appraisal Commentary, which we received on 7th January 2008.</p> <p>Centro-WMPTA have not sought to answer specific questions, but provided comments on the general issues raised by this document. Although outside the metropolitan area, Centro-WMPTA are happy to assist in the continued development of this document and provide information and guidance where necessary, particularly as Stafford is within the 'travel to work' area for the West Midlands region. In respect of Centro-WMPTA's interest it is encouraging that the Stafford Borough LDF: Sustainability Appraisal Commentary identifies realistic and achievable areas of actions for partners and clearly acknowledges the contribution that public transport can make. Centro-WMPTA is committed to improving sustainability by encouraging modal shift to public transport as the preferred mode of travel for</p>

business, leisure and pleasure.

Centro-WMPTA would also like to emphasise that it is important that there is strong correlation between the objectives of this document and the principles set out in the West Midlands Regional Spatial Strategy (WMRSS) as outlined through Policies T1-T12, the Regional Transport Strategy (RTS). This is especially important in relation to land use planning and reducing the need to travel. The presence of a high quality public transport network provides an attractive alternative to the private car and can therefore contribute to a reduction in road traffic congestion. A high quality public transport network can assist in economic growth and regeneration as well as support housing growth, help tackle congestion, and assist in increasing social inclusion, whilst also ensuring that the West Midlands transport sector contributes to the wider challenges including reducing climate changing emissions. Intense development should therefore be focused in places that are well served by public transport as outlined by the Regional Spatial Strategy Policy T2. Additionally a high quality public transport network can help to ensure that all people, especially those without access to a private car, can access key services such as employment or educational opportunities.

Centro-WMPTA would be supportive of actions that clearly promote the role of public transport in achieving sustainability aims. For example, promotion of the following messages: -

- Cross boundary journeys for employment, socially necessary or leisure purposes by public transport.
- A coherent package supporting 'smarter choices' to encourage behavioural change in peoples travel patterns complemented by a high quality public transport system which allows people to make informed choices about which mode they use to travel where and when they need to. Also encouraging developments that generate significant demand on travel to be located near public transport.
- Promoting greater use of and additional spaces at park and ride facilities (including cycle racks)
- Promotion of rail routes to provide better and wider coverage
- Working with bus operators for better fuel-efficient vehicle standards.
- Promotion of public transport and sustainable communities to enable environmental change.

More generally, Centro-WMPTA seeks to continually improve its own environmental performance and contribution to sustainable development from all of its activities, infrastructure, products and services, such as influencing operators in using better fuel efficient vehicles and working with a range of national, regional and local organisations to support and encourage behavioural and cultural change to increase in the number of people who use public transport for their journeys.

	<p>I would appreciate you keeping me informed on the progress of this document and if you have any further queries, would like any further information, please do not hesitate to contact me.</p>
<p>Change made to Sustainability Appraisal documents</p>	<p>Comments noted. Relevant policies in the RSS and Regional Transport Strategy have been carried forward into the relevant sections in the technical appendices.</p> <p>In addition the following decision making criteria have been included alongside the sustainability objectives.</p> <p>Will it lead to a net reduction in the number of people commuting to work outside the borough? Will it support existing services and facilities? Will it result in new developments being located in areas served by public transport? Will it improve accessibility to key local services? Will it make access easier for those without a car?</p> <p>It is anticipated that this will give a more detailed assessment and commentary on transport and travel to work information.</p>
<p>Jane Field, The Environment Agency</p>	<p>Thank you for referring the above sustainability appraisal in support of your Development Strategy document. This was received via the Limehouse Portal on 4th January 2008, and in hard copy format on 7th January 2008. We welcome the addition of various plans, programmes and policies, and rewording of targets and indicators as requested in our previous letter of 7th December 2007.</p> <p>We recommend however, that the final two indicators and targets relating to Objective 14 are amended in subsequent SAs as they appear to duplicate each other. It is advised that the indicators would better read: <i>Indicator:- the number of developments given planning permission contrary to Environment Agency advice based on an unacceptable risk of contamination to 'Controlled Waters'</i> <i>Target:- None</i></p> <p>Section 104 of the 1991 Water Resources Act defines 'Controlled Waters' as "territorial waters which extend seawards for three miles, coastal waters, inland freshwaters, that is to say, the waters in any relevant lake or pond or of so much of any relevant river or watercourse as is above the freshwater limit, and ground waters, that is to say, any waters</p>

	contained in underground strata". This therefore encapsulates all the water quality issues for concern.
Change made to Sustainability Appraisal documents	<p>The following 2 indicators and targets have been removed.</p> <p>The number of development given planning permission contrary to EA advice Target: None</p> <p>Number of developments given planning permission contrary to EA advice Target: No planning permission to be granted contrary to the Environment Agency's advice based on the risk of contamination to underlying groundwater</p> <p>The following has been included</p> <p><i>Indicator:- the number of developments given planning permission contrary to Environment Agency advice based on an unacceptable risk of contamination to 'Controlled Waters'</i> <i>Target:- None</i></p>
Sustainability Appraisal Objectives	
Mr James Eld	Ensure the maintenance of a viable and productive agricultural system in the borough by minimising the amount of productive agricultural land taken for housing and employment development.
Change made to Sustainability Appraisal documents	<p>In is anticipated that the inclusion of the following detailed decision making criteria will address the issue of loss of productive agricultural land.</p> <ul style="list-style-type: none"> • Will it result in the protection/retention of the Best and Most Versatile agricultural land (Grades 1-3a)?
Mr Roderic Hammerton, CAMRA	<p>In terms of sustainability Objective 4 - To support the needs of the local rural economy and community - rural public houses are crucial both to economic and social well-being. This is recognised by many rural planning authorities. Should there be any opportunity to revise the indicators, therefore, an additional indicator - number of community public houses and target - no reduction should be incorporated.</p> <p>In terms of the key sustainability issues given at the end of the section, under social issues - we would argue that</p>

	'decline in local community pubs' should be added to the bullet points. As you will be aware, numbers of both urban and rural pubs are now falling. (CAMRA has a database to evidence this should you be interested)
Change made to Sustainability Appraisal documents	<p>Comments noted. Loss of public houses to housing is an issue across the country and there are several cases of this in the Borough. It is anticipated that the inclusion of the following detailed decision making criteria will address the issue of loss of local services, including public houses.</p> <ul style="list-style-type: none"> • Will it improve accessibility to key local services? • Will it protect existing key services and facilities? <p>Loss of local services and facilities has also been flagged up as a key sustainability issue.</p>
Key Question 1 - Do you think broad options and alternatives identified in the table are correct?	
Miss A Smith, English Heritage	The identified options and alternatives are wide ranging, but tend to be based on directly contrasting options rather than more subtle variations. An additional option is building reuse, conversion over new build.
Change made to Sustainability Appraisal documents	Comments notes. Building reuse, conversion over new build has been added as an option in the Mode / Process section of the options table.
Jane Field, The Environment Agency	The Environment Agency considers there are no broad options or alternatives omitted from the SA.
Change made to Sustainability Appraisal documents	Comment noted. No change proposed.
Paragraph 4.4	
Mr James Eld	I consider that the Stafford, Stone and Principal Settlements is the likely choice while recognising that Growth Distribution Widely is likely to occur naturally unless blocked.
Change made to	

Sustainability Appraisal documents	Comment noted. No change proposed.
Key Question 2 - Should any other strategy options be appraised?	
Miss A Smith, English Heritage	See comments above on issue 6.
Change made to Sustainability Appraisal documents	See proposed change to previous comment.
Jane Field, The Environment Agency	The Environment Agency are of the opinion that there is no need to appraise any additional strategic options.
Change made to Sustainability Appraisal documents	Comment noted. No change proposed.
Mr James Eld	The current strategies are sufficient if the size of the required development is really justified. I question where the additional residents predicted will come from.
Change made to Sustainability Appraisal documents	Comment noted. No change proposed.
Key Question 3 - Do you think the comments for each strategy option are correct?	
Miss A Smith, English Heritage	All could benefit from greater explanation of potential environmental implications beyond Greenfield land take, for example implications of potential intensification and loss of townscape character, pressure on water resources, traffic congestion and air pollution.
Change made to Sustainability	Comments noted. It is anticipated that with the introduction of detailed decision making criteria a more detailed assessment and commentary can be provided, drawing on more detailed issues from each objective, including water

Appraisal documents	resources, traffic congestion and air pollution.
<p>Jane Field, The Environment Agency</p>	<p>The Environment Agency has reviewed the options appraisal matrix with specific attention on environmental issues and generally concurs with the conclusions drawn.</p> <p>However it is not clear how the appraisal of each site in relation to Objective 14 has been undertaken. The breadth of the objective i.e. from water quality (both in rivers and groundwater) to flood risk makes it difficult to give a generalized positive or negative outcome for each option.</p> <p>For instance, the higher percentage of brownfield development in Stafford could potentially improve water quality if contaminated land was remediated prior to development. In addition foul drainage would be more likely to go to mains, therefore reducing the risk of water pollution. However, Stafford has a significant expanse of floodplain, and historically contaminated industrial land is located close the river, therefore development is more likely to be located in this zone creating more opportunities for the reduction of floodplain capacity.</p> <p>Development in rural areas will be less prone to groundwater contamination as it is assumed there will be a higher percentage of Greenfield development (however this does not allow for improvement of the existing situation). To balance this, if adequate foul drainage infrastructure is not provided by STW Ltd there remains a higher probability of pollution occurring from a foul drainage source.</p> <p>The Environment Agency looks forward to the consultation on <i>Delivering the Development Strategy</i> in the spring, and anticipate making more detailed comments on the suitability of each option based on the SFRA, as stated in para 5.3.</p>
Change made to Sustainability Appraisal documents	<p>Comments noted. Previous appraisal of options in terms water resources have focused on the broad pressure additional development would put on the water system. The comments provided by the Environment Agency will be of use in the next stage of the appraisal process, where more specific locations will be appraised. Issues highlighted in the response have also been incorporated in the detailed decision making process highlighted below:</p> <ul style="list-style-type: none"> • Will it minimise and seek to reclaim derelict and contaminated land? • Will it protect floodplain capacity? • Will it reduce direct or indirect pollution of the water environment? Including reference to Is there adequate foul drainage infrastructure?

Technical Appendix – Appraisal of Options	
Jane Field, The Environment Agency	<p>It is drawn to your attention that PPS23 may be an appropriate policy document to reference under Objective 14, as it deals with water pollution in addition to contaminated land.</p> <p>Also DETR Circular 3/99 <i>Planning Requirement in respect of the Use of Non-Mains Sewerage incorporating Septic Tanks in New Development</i> has significant implications on water quality, particularly in rural areas where there may not be a public mains sewer available. A potential indicator of water quality could be the number of development proposals which are to dispose of foul waters via a non-mains technique. It is granted that this may be unavoidable in certain situations, for example to the provision of a farm-worker's dwelling, but this should not occur for larger developments (potentially a Site Allocation) where the public mains system should be extended in order to serve such a development.</p>
Change made to Sustainability Appraisal documents	<p>Relevant information from PPS23 and the DETR Circular 3/99 has been included in the technical appendix under Objective 14.</p> <p>In addition the following indicator and target has been included into the sustainability appraisal framework Number of development proposals which are to dispose of foul waters via a non-mains technique Target: All large developments to dispose foul water via mains</p>