

wardell-armstrong.com

ENERGY AND CLIMATE CHANGE
ENVIRONMENT AND SUSTAINABILITY
INFRASTRUCTURE AND UTILITIES
LAND AND PROPERTY
MINING, QUARRYING AND MINERAL ESTATES
WASTE RESOURCE MANAGEMENT



DAVID WILSON HOMES (MERCIA)

THE PLAN FOR STAFFORD BOROUGH: PART 2 PROPOSALS

HEARING STATEMENT – ISSUE 2

JUNE 2016

your earth our world



1 ISSUE 2: SUSTAINABILITY APPRAISAL (SA) AND HABITATS REGULATION ASSESSMENT (HRA)

1.1 Is PSB2 supported by the SA and HRA?

1.1.1 The PSB2 is supported by an SA, however it is not supported with a HRA.

1.1.2 Correspondence from Stafford Borough Council to Natural England (P2-A25) indicates that the SBC consider that a HRA is not required and can be screened out because the adopted Plan for Stafford Borough 2011-2031 (June 2014) was subject to the Habitat Regulations Assessment process. In addition, SBC consider as a result of recent planning approvals in these areas and progress on a number of Neighbourhood Plans, which have individually addressed Habitat Regulations Assessment requirement, no significant new development is proposed within these boundaries.

1.1.3 This is not considered appropriate for the following reasons:

- The level of potential housing and employment growth being proposed within each settlement has not been clarified or confirmed by SBC. The settlement boundaries includes areas which are draft proposals within emerging Neighbourhood Plans;
- There is no confirmation that all draft or adopted Neighbourhood Plans were subject to HRA;
- It is unlikely that all planning permissions for housing and employment growth have been subject to a HRA;
- In light of the above the cumulative impact of the potential level of development within each settlement and the effect of this proposed growth on the designated interest features of European Sites has not been considered.

1.2 Do any adverse effects identified in the SA require significant mitigation, and how does PSB2 address these issues?

1.2.1 The SA (Paragraph 32) does not identify any adverse effects associated with the proposed plan. The SA indicates that:

“No recommendations were made as a result of the SA, as although the potential for minor negative effects were identified for some of the proposed policies, it is

considered that sufficient mitigation is provided by the existing policies in Part 1 of the Plan for Stafford Borough.”

1.2.2 However, the findings of the SA are considered to be flawed. One example of this is a consideration of the impact of the Plan on the delivery of affordable housing. Objective 6 of the SA seeks *“to ensure that everyone has the opportunity of a decent and affordable home”*. In relation to this SA objective the assessment does not consider the following.

- What is the level of need for Affordable Housing within the Borough including Stafford Town and within Stone Town?
- To what extent has affordable housing been delivered within Stafford Borough and within Stafford Town and Stone Town?
- Are existing commitments likely to meet future requirements in full for affordable housing within these locations?
- In light of all of the above does the proposed plan adequately address this matters?

1.2.3 The SA simply does not consider these matter and therefore it cannot confirm if significant adverse effects will occur in the PSB2.

STOKE-ON-TRENT
Sir Henry Doulton House
Forge Lane
Etruria
Stoke-on-Trent
ST1 5BD
Tel: +44 (0)845 111 7777

CARDIFF
22 Windsor Place
Cardiff
CF10 3BY
Tel: +44 (0)29 2072 9191

EDINBURGH
Suite 2/3, Great Michael House
14 Links Place
Edinburgh
EH6 7EZ
Tel: +44 (0)131 555 3311

GREATER MANCHESTER
2 The Avenue
Leigh
Greater Manchester
WN7 1ES
Tel: +44 (0)1942 260101

LONDON
Third Floor
46 Chancery Lane
London
WC2A 1JE
Tel: +44 (0)20 7242 3243

NEWCASTLE UPON TYNE
City Quadrant
11 Waterloo Square
Newcastle upon Tyne
NE1 4DP
Tel: +44 (0)191 232 0943

PENRYN
Tremough Innovation Centre
Tremough Campus
Penryn
Cornwall
TR10 9TA
Tel: +44 (0)1872 560738

SHEFFIELD
Unit 5
Newton Business Centre
Newton Chambers Road
Thorncliffe Park
Chapelton
Sheffield
S35 2PH
Tel: +44 (0)114 245 6244

TRURO
Wheal Jane
Baldhu
Truro
Cornwall
TR3 6EH
Tel: +44 (0)1872 560738

WEST BROMWICH
Thynne Court
Thynne Street
West Bromwich
West Midlands
B70 6PH
Tel: +44 (0)121 580 0909

International offices:

ALMATY
29/6 Satpaev Avenue
Rakhat Palace Hotel
Office Tower, 7th Floor
Almaty
050040
Kazakhstan
Tel : +7-727-3341310

MOSCOW
Suite 2, Block 10,
Letnikovskaya St.
Moscow, Russia
115114
Tel: +7(495) 980 07 67

Wardell Armstrong Archaeology:

CUMBRIA
Cocklakes Yard
Carlisle
Cumbria
CA4 0BQ
Tel: +44 (0)1228 564820