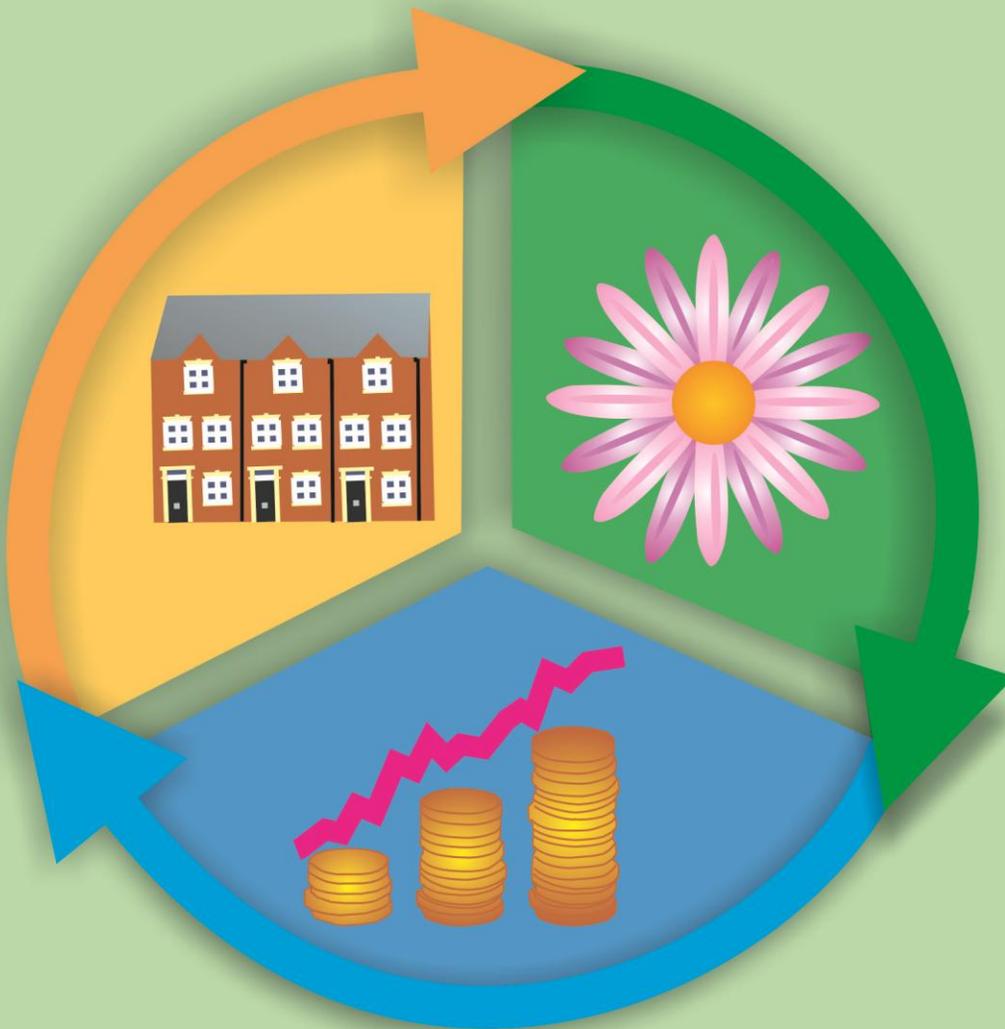


# Local Plan (Examination) Revised Sustainability Appraisal Report: Addendum



**JULY 2015**



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# Chapter 1

## Non Technical Summary

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### Introduction

**1.1** The following non-technical summary forms part of the Sustainability Report (SA) and also as a standalone document. It informs consultees and the general public about the process of Sustainability Appraisal in Plain English, avoiding the use of technical terms. The production of a non-technical summary is a requirement of the EU Directive known as the 'SEA Directive'.

**1.2** This non-technical summary relates to the **Revised Sustainability Appraisal (SA) Report: Addendum** which has been prepared by East Staffordshire Borough Council to support the examination of the Local Plan.

**1.3** East Staffordshire Borough Council has prepared a Local Plan as part of the Council's statutory duty to prepare, monitor and review a Development Plan for the Borough<sup>1</sup>. The Plan is being prepared in accordance with the Localism Act 2011, the National Planning Policy Framework (March 2012) and associated Development Plan Regulations (2012).

**1.4** This Addendum describes how the Main and Minor Modifications to the Plan alter the previous conclusions of the submission SA Report. The report focuses predominantly on the Main Modifications to the Plan as they are proposed to address issues of soundness. Whilst the Minor Modifications do not affect the soundness of the Plan, they are also considered in the context of this report for completeness.

### Sustainable Development

**1.5** At the heart of sustainable development is the idea of ensuring a better quality of life for everyone, now and in the future. The most widely used definition was drawn up by the World Commission on Environment and Development in 1987:

*'development that meets the needs of the present without compromising the ability of future generations to meet their own needs'*

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<sup>1</sup> Section 15 of the Planning and Compulsory Purchase Act 2004, as amended by Section 111 of the Localism Act 2011

**1.6** In 1999 the Government set four main aims for sustainable development in its strategy 'A Better Quality of Life: A Strategy for Sustainable Development in the UK'. These were:

- Social progress which recognises the needs of everyone;
- Effective protection of the environment;
- Prudent use of natural resources; and
- Maintenance of high and stable levels of economic growth and employment.

**1.7** No one of these objectives is more important than any other. Whilst there will be tensions between them, in the long term, success is dependent upon simultaneous delivery of all four objectives.

### **Role of the Local Plan in the delivery of Sustainable Development**

**1.8** The purpose of the planning system is to contribute to the achievement of sustainable development. Policies in Local Plans can help the achievement of sustainable development by guiding development to the most sustainable locations and setting out standards in policies that development must meet to ensure sure there will be no social, economic or environmental impacts.

### **Sustainability Appraisal and Strategic Environmental Assessment**

**1.9** The purpose of SA is to promote sustainable development through better integration of sustainability considerations into the preparation and adoption of plans. SA is an integral and important part of good plan making and should not be seen as a separate activity. It is an iterative process which means that the SA informs the plan and as the Local Plan evolves it informs the SA. This process continues through the preparation of the plan until it is adopted.

**1.10** The SA process identifies and reports on the likely significant effects of the plan and the extent to which the delivery of the plan will achieve the social, environmental and economic objectives in accordance with sustainable development principles.

**1.11** The Local Plan sets out the overall approach which the Council, working with its partners, will use to guide and control the future use and development of land and to improve and protect the borough's environment.

**1.12** Throughout the development of the Local Plan, the Council has undertaken a process of Sustainability Appraisal (SA) incorporating the requirements of Strategic Environmental Assessment (SEA).

**1.13** The Sustainability Appraisal attempts to predict the likely effects, both positive and negative, that the delivery of the Local Plan will have on people and the environment. The report makes recommendations to improve the Local Plan so that negative effects can be lessened or eliminated altogether, and positive effects created or enhanced. It also proposes monitoring that could be undertaken in order to measure how the Local Plan affects people and the environment in reality. The Sustainability Appraisal is an important tool to aid the selection of options and is not the actual decision-making mechanism

## **Addendum**

**1.14** This addendum is principally concerned with the appraisal of the proposed modifications to the plan. The aim is to present an appraisal of the proposed Main Modifications (MM) and Additional Modifications (AM) 'as a whole', i.e. the proposed modifications acting in combination. There are 99 Main Modifications and 133 Additional Modifications in total, most which focus on policy wording (and/or supporting text). It is also appropriate to give a refreshed consideration to the 'cumulative effects' of implementing the plan including the proposed modifications.

**1.15** For a complete understanding of the entire SA process of the Local Plan, it is important that this Addendum is read in conjunction with the following documents:

- Pre-Submission Local Plan Sustainability Appraisal (October 2013 Doc B9);
- Revised Sustainability Appraisal March 2014 (Doc A6);
- Local Plan Examination Revised Sustainability Appraisal December 2014 (F41);
- Schedule of Main Modifications (F76); and
- Schedule of Additional Modifications (F77)

**1.16** The Local Plan Examination Revised Sustainability Appraisal Report (Doc F41) provides a full description of the SA process, from the initial Scoping Report, through to the Submission Sustainability Appraisal Report including appraisal of strategy options, site options as well as proposals for monitoring.

## Methodology

**1.17** Sustainability Appraisal looks at each objective, site option and policy against the SA framework which sets out criteria for each sustainability objective as set out in Table 1.1 below. Under each objective there are a series of questions, targets and indicators which have been developed to help appraise policies and sites. The same methodology used throughout the Sustainability Appraisal process is used to appraise the modifications.

**Table 1.1: SA objectives**

<b>Objective</b>	<b>Description</b>
Housing	To provide a suitable mix of decent housing available and affordable to everyone
Economy	To achieve a prosperous and diverse economy, encourage high and stable levels of employment and sustain economic competitiveness
Transportation	To reduce the need to travel, encourage more sustainable modes of transport and make best use of existing transport infrastructure
Climate change, energy and air quality	To reduce the causes and impacts of climate change, improve air quality, promote energy efficiency and encourage the use of renewable energy
High quality design and sustainability	To encourage sustainable design and practice and create a high quality built environment
Green Infrastructure and Open Space	To protect, enhance and provide new Green Infrastructure assets
Town centre	To sustain the vitality and viability of Burton and Uttoxeter town centres
Rural Communities	To sustain vibrant rural communities
Flood risk	To reduce and manage the risk of flooding which would be detrimental to the public well-being, the economy and the environment
Use of land	To deliver more sustainable use of land in more sustainable locations
Natural Resources	To ensure the prudent use of natural resources and the sustainable management of existing resources
Quality of Life	To improve the quality of life, including the health, safety and well being of those living and working in the borough
Landscape quality	To protect, maintain and enhance the character and appearance of the landscape and townscape quality, maintaining and strengthening local distinctiveness and sense of place

Biodiversity and Geodiversity	To promote biodiversity and geodiversity through protection, enhancement and management of species and habitats
Water Quality	To protect and enhance water quality of the Borough's rivers whilst maximising their carrying capacity through achieving sustainable water resource management
Countryside and Historic Environment	To protect and enhance landscape character, historic buildings, archaeological sites and cultural features of importance to the community. And to protect and maintain all vulnerable assets (including built and historic)

1.18 The proposed modifications amend the following policies:

<u>Policy</u>	<u>Policy Title</u>
<b>Principle 1</b>	Presumption in Favour of Sustainable Development
<b>SP1</b>	East Staffordshire Approach to Sustainable Development
<b>SP2</b>	A Strong Network of Settlements (proposed modification to rename policy to <b><u>Settlement Hierarchy</u></b> )
<b><u>SPX</u></b>	<b><u>Role of Neighbourhood Plans (new policy)</u></b>
<b>SP3</b>	Provision of Homes and Jobs 2012 – 2031
<b>SP4</b>	Distribution of Housing Growth 2012 – 2031
<b>SP5</b>	Distribution of Employment Growth 2012 – 2031 (allocations)
<b>SP6</b>	Managing the Release of Housing and Employment Land
<b>SP7</b>	Sustainable Urban Extensions
<b>SP8</b>	Development Outside Settlement Boundaries
<b>SP9</b>	Infrastructure Delivery and Implementation
<b>SP10</b>	Education Infrastructure
<b>SP11</b>	Bargates/Molson Coors Strategic Allocation
<b>SP12</b>	Derby Road, Burton upon Trent, Regeneration Corridor
<b>SP13</b>	Burton and Uttoxeter Existing Employment Land Policy
<b>SP14</b>	Rural Economy

<b>SP15</b>	Tourism, culture and leisure development
<b>SP16</b>	Meeting Housing Needs
<b>SP17</b>	Affordable Housing
<b>SP18</b>	Residential Development on Exception Sites
<b>SP19</b>	Sites for Gypsies, Travellers and Travelling Showpeople
<b>SP20</b>	Town and Local Centres Hierarchy
<b>SP21</b>	Managing Town and Local Centres
<b>SP22</b>	Supporting Local Communities
<b>SP23</b>	Green Infrastructure
<b>SP24</b>	High Quality Design
<b>SP25</b>	Historic Environment
<b>SP26</b>	National Forest
<b>SP27</b>	Climate Change, Water Body Management and Flooding
<b>SP28</b>	Renewable and Low Carbon Energy Generation
<b>SP29</b>	Biodiversity and Geodiversity
<b>SP30</b>	Locally Significant Landscape
<b>SP31</b>	Green Belt and Strategic Green Gaps
<b>SP32</b>	Outdoor Sports and Open Space Policy
<b>SP33</b>	Indoor sports policy
<b>SP34</b>	Health and Wellbeing
<b>SP35</b>	Accessibility and Sustainable Transport

**Policy**

**Policy Title**

<b>DP1</b>	Design of New Development
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<b>DP2</b>	Designing in Sustainable Construction
<b>DP3</b>	Design of New Residential Development, Extensions and Curtilage Buildings
<b>DP4</b>	Replacement Dwellings in the Countryside
<b>DP5</b>	Protecting the Historic Environment: All Heritage Assets, Listed Buildings and Conservation Areas <b><u>and archaeology</u></b>
<b>DP6</b>	Protecting the Historic Environment: Other Heritage Assets
<b>DP7</b>	Pollution <b><u>and contamination</u></b>
<b>DP8</b>	Tree Protection
<b>DP9</b>	Advertisements
<b>DP10</b>	Water Recreation and Blue infrastructure
<b>DP11</b>	European Sites
<b>DP12</b>	St George's Park

## Evaluation of Effects – Modifications

**1.19** Overall, as described in more detail in the appendices, there are no likely significant effects of the Modifications on their own. The main likely significant effects of the Local Plan with the modifications overall are thought to be:

### Adverse (negative) effects

- The irreversible loss of greenfield land and the consequent impact upon landscapes
- Potential for the increase in the amount of waste produced by the Borough as a result of construction processes
- Increases in the amount of energy consumed by the Borough as a result of an increased population

- Short term negative effect in relation to the impact of construction processes on air quality
- Longer term impact more generally associated with traffic generation is uncertain
- Short-term increases in greenhouse gas emissions as a result of construction traffic

### **Beneficial (positive) effects**

- Significant long-term benefits of Green Infrastructure, National Forest planting and high quality accessible open space and greenspaces including the health and well-being of communities and the benefits to wildlife through habitat creation, management and enhancement
- Increases in employment opportunities in the Borough, and improved accessibility to those opportunities
- A greatly improved mix of good-quality housing in the Borough, including more affordable housing and housing to meet the needs of a changing population
- Quality design leading to a better sense of community identity, and more reasons for residents to be proud of their communities
- Re-use of brownfield land in the Borough, particularly in Burton and Uttoxeter Town Centre, reducing the amount of greenfield land developed and improving the quality of the existing built environment
- Potential increases in the proportion of waste reused and recycled and
- Significantly reduced reliance upon the car coupled with strong promotion of sustainable transport modes (e.g. walking, cycling and public transport)

**1.20** Overall the impact of the policies is a mix of positive and negative effects and some effects are both positive and negative at the same time. Many of the impacts relate to the way in which the policies are implemented and it is difficult

to assess how this will be achieved. The aim is that the policy framework as it is currently written will through mitigation and a robust set of policies, which when applied in combination, deliver significant positive benefits in the delivery of development.

**1.21** There will be some negative effects on the environment (for example soil conservation, biodiversity, geodiversity and water) as a result of development being proposed on significant greenfield sites on the edge of the existing settlements, in both urban and rural locations. With the exception of loss of countryside other negative impacts are more closely associated with short-term construction impacts which will be reduced over time as infrastructure is delivered and established.

**1.22** Mitigation forms part of the policy framework which will in part reduce the impact of development in the countryside, such as the provision of green infrastructure, open space and well designed communities that fit into their surroundings. However mitigation cannot avoid impacts entirely therefore leading the Council to approach greenfield development through the development of sustainable urban extensions as much as possible.

**1.23** The aim of the policy framework is to deliver sustainable communities which offset the impact of developing on greenfield sites. For example such communities will be designed to ensure that travel is minimised through the provision of walking and cycling networks that link together important facilities and services such as schools, local shops, employment areas, bus stops, and amenity and play areas. In particular the delivery of employment sites within a couple of the sustainable urban extensions further underpins a strategy which seeks to co-locate growth as much as possible to make it easier to commute to work using non-car based travel. It is considered that the benefit of delivering growth across the Borough outweighs the negative impacts which are confined to the development of greenfield sites. There is no other way to deliver growth to meet the Borough's needs.

## **Assumptions and Uncertainties**

**1.24** Throughout the development of the Local Plan and the Sustainability Appraisal process, data gaps and uncertainties were uncovered. It is not always possible to accurately predict sustainability effects when considering plans at such a strategic scale. Impacts on biodiversity and cultural heritage, for example, will depend on more detailed information and specific studies at a site-level. And whilst climate change science is becoming more accurate, it is difficult to predict impacts likely to result from climate change, including synergistic effects. These

uncertainties have been acknowledged in the appraisal matrices, where applicable. It will be important to monitor the effects plan to address any uncertainties in the future.

### Mitigation and enhancement recommendations

**1.25** Overall, when appraised as a whole, it is considered that many of the policies will act as mitigation for other policies with a possibly negative impact. Such effects are mainly linked to impacts on countryside and landscape, biodiversity, flood risk, the historic environment and impacts on transport. The implementation of all policies will be important to ensure that mitigation is provided alongside development. Recommendations from the appraisal of previous policies, objectives and strategic sites have been incorporated into the plan along with changes which respond directly to the updated evidence base.

## Chapter 2: SEA Regulations Requirements Checklist

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**2.1** Table 2.1 indicates where the specific requirements of the SEA Regulations are addressed within the SA report. The report itself fulfils the requirement of Regulation 12(1), which states: “Where an environmental assessment is required by any provision of Part 2 of these Regulations, the responsible authority shall prepare, or secure the preparation of, an environmental report in accordance with paragraphs (2) and (3) of this regulation.” Paragraphs (2) and (3) of Regulation 12 are in the table below.

**Table 2.1: Environmental Report Requirement**

Environmental Report Requirements	Section(s) of report <sup>2</sup>
<b>Relevant Regulations</b>	
12-(2) 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.	Full Report and Addendum
12-(3) The report shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents	

<sup>2</sup> The Local Plan Examination Sustainability Appraisal and this Addendum

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).	
<b>Information referred to in Schedule 2, as required through Regulation 12-(3)</b>	
An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes.	Chapter 9
The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme and the environmental characteristics of areas likely to be significantly affected.	Chapter 6 and Appendix B
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.	Chapter 6 and Appendix B
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 consideration have been taken into account during its preparation.	Appendix B
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 these factors.	Chapters 9 and 10 and Addendum
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.	Chapters 10
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.	Chapters 7, 8 and 9
A description of measures envisaged concerning monitoring in accordance with Article 10.	Chapter 12
A non-technical summary of the information provided under the above headings.	Chapter 1 and Addendum

## Next Steps

**1.27** Depending upon the scope and extent of the modifications, further Sustainability Appraisal work may also be required.

# Chapter 3

## Background and Context

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**3.1** This Revised Sustainability Appraisal follows the examination hearings and preparation of a schedule of proposed modifications.

A schedule of proposed Main Modifications has been prepared by the Council, and is published for consultation at the current time.

### Sustainability Appraisal

**3.2** The purpose of Sustainability Appraisal (SA) is to promote sustainable development through the integration of social, environmental and economic considerations into the preparation of Development Plan Documents. It is mandatory under Section 39(2) of the Planning and Compulsory Purchase Act 2004 (The Act) as amended. The Act requires that all Development Plan Documents, which the Local Plan is, to be prepared with a view to *'contributing to the achievement of sustainable development'* (S.39(2)). The Act states that:

*'The Local Planning authority must also:-*

- 1) Carry out an appraisal of the sustainability of the proposals in each development plan document;*
- 2) Prepare a report of the finding of the appraisal'. (Section 19(5) as amended by the Planning Act 2008).*

**3.3** Paragraph 165 of the National Planning Policy Framework requires the preparation of a Sustainability Appraisal which meets the requirements of the European Directive on Strategic Environmental Assessment and be an integral part of the plan preparation process considering all the likely significant effects on the environment, economic and social factors. The SA considers how the principles of sustainable development have been taken into account in the development of the Local Plan.

**3.4** SA and SEA are required by separate legislation, however, due to commonalities between the two processes, SEA and SA can be undertaken together. Therefore where SA is referred to in this document, this incorporates the requirements of SEA.

**3.5** The relationship between the plan-making process and Sustainability Appraisal is illustrated Figure 3.3 below.

## **Local Plan**

**3.6** This Revised Sustainability Appraisal (SA) Report has been prepared by East Staffordshire Borough Council, and represents the Sustainability Appraisal Report to support the Submission Local Plan in line with the relevant legislation and guidance.

**3.7** East Staffordshire Borough Council has prepared the Local Plan as part of the Council's statutory duty to prepare, monitor and review a Development Plan for the Borough<sup>3</sup>. The Plan has been prepared in accordance with the Localism Act 2011 and the National Planning Policy Framework (March 2012) and associated Development Plan Regulations (2012).

**3.8** The Local Plan will replace the policies saved from the previous adopted Local Plan (2006), which was approved on 20 July 2009 by a Direction from the Secretary of State, as adopted planning policies and part of the Development Plan.

**3.9** The Local Plan is the principal document which will set the spatial strategy for growth, strategic allocations and policies for managing change across the Borough. It will be supported by a second Development Plan Document which will address non-strategic allocations once the Local Plan has been adopted. The Local Plan will also set the context for Neighbourhood Plans which are currently being prepared for twelve communities across the Borough.

**3.10** As part of the process for preparing the Local Plan, the Council has a statutory obligation to undertake Strategic Environmental Assessment (SEA) and Sustainability Appraisal (SA)<sup>4</sup>. This document is the Sustainability Appraisal Report for the East Staffordshire Local Plan Pre-Submission Report.

**3.11** Integral to Local Plan preparation this appraisal informs and shapes policies and proposals in an iterative and transparent way, ensuring that decisions are made that contribute to achieving sustainable development and contribute to our understanding of reasonable alternatives.

**3.12** This SA Report identifies and appraises the likely significant effects of the strategy, sites and policy proposals contained within the emerging Local Plan. It

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<sup>3</sup> Section 15 of the Planning and Compulsory Purchase Act 2004, as amended by Section 111 of the Localism Act 2011

<sup>4</sup> European Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the SEA Directive)

also appraises the extent to which implementation of the plan will achieve the social, environment and economic objectives of sustainable development.

### Sustainability Appraisal Methodology

**3.13** The Sustainability Appraisal Scoping Report, published in February 2012, provides an overview<sup>5</sup> of the ongoing approach of the appraisal process, which underpins the more detailed methodology undertaken.

**3.14** The Local Plan Preferred Option contained strategic and detailed policies. These policies help to guide the appropriateness of development over the plan period, including in relation to the strategic allocations. In a number of cases, evidence base documents have helped inform the identification of appropriate policies.

**3.15** Each policy was scored individually against each sustainability objective and given a score in accordance with the framework criteria set out below:

**Table 3.1: Sustainability Appraisal Key**

Symbol	Likely effect on the SA Objective
✓✓	The option is likely to have a <b>very positive</b> impact on the achievement of sustainability objectives
✓	The option is likely to have a <b>positive</b> impact on the achievement of sustainability objectives
0	No significant effect/ neutral
?	<b>Uncertain</b> or <b>insufficient information</b> on which to determine impact
-	The option is likely to have a <b>negative</b> impact on <b>potential</b> sustainability issues; mitigation and/or negotiation possible
--	The option is likely to have a <b>very negative</b> impact on <b>known</b> sustainability issues; mitigation or negotiation <b>difficult and/or expensive</b>
~	No clear link

<sup>5</sup> Chapter 7 of the Scoping Report

# Chapter 4:

## Sustainability Appraisal of Modifications - Conclusions

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### Policies

**4.1** Overall there is no significant change to the appraisal of the policies as a result of the modifications. The appraisal is different for the following policies:

- SP21 (from positive to very positive effect against sustainability objective 8)
- SP28 (from neutral to positive effect against sustainability objective 2)
- SP33 (from neutral to positive effect against sustainability objective 10)
- DP1 (from neutral to positive effect against sustainability objective 6)
- DP2 (from neutral to positive effect against sustainability objective 14)
- DP10 (from neutral to positive effect against sustainability objective 10)

**4.2** The Sustainability Appraisal of the Strategic and Detailed Policies contained in the Revised Sustainability Appraisal remains the conclusion on the significant effects of the plan when taking into account the modifications.

### *Summary of Assessment/Significant Effects*

**4.3** Those policies which relate to place shaping policies, setting out the level and location of growth are intended to create and deliver sustainable communities. The policies are largely concerned with the strategic delivery of growth both in terms of quantum and distribution across the Borough to a range of different settlements. The sustainability appraisal highlights that the policies perform well against the housing objectives because they seek to deliver housing to meet local needs through housing choice. Policies also perform against the employment objective due to the delivery of strategic employment sites and mixed use sites. Underpinning the creation of sustainable communities (Policy SP4) is the need to deliver accessible and sustainable places and as such objectives including transport, quality of life and green infrastructure score positively. Taken as a group these policies have a positive score against the objectives, but Policy SP4 scores negatively against the use of land, countryside and landscape objectives due to the large greenfield land take required to deliver the sites and the irreversibility of the impact when land has been developed.

### ***Short/medium/long term impacts***

**4.4** In the short term construction sites will have a negative impact on the environment. Impacts will increase over time as more development sites come forward for delivery but at the same time the mitigation measures such as green infrastructure will also mature and become well established. The modification to amend the housing trajectory further reiterates the conclusion that the impact will continue over the plan period.

### ***Summary of mitigation measures***

**4.5** The delivery of development is offset by policies which seek to mitigate impacts. In particular Policy SP24 ensures high quality design which is integral to delivering well planned, safe and locally distinct development which considers the existing context and seeks to promote accessibility. Policy SP23 aims to ensure the delivery of green infrastructure, a key principle driving forward the growth strategy for the Borough. The benefits to the development scheme and individuals quality of life is enhanced by the provision of green infrastructure however its purpose is also as a way of introducing wildlife corridors and green walking and cycling routes in addition to the more obvious amenity provision. The delivery of Sustainable Urban Extensions also provides a coherent approach to delivering growth and at the same time reducing its impact.

### ***Secondary, cumulative or synergistic effects***

**4.6** Synergistic effects include the interaction of the place shaping policies that reduce the impact of development proposals including the consideration of sustainable drainage, biodiversity, design and energy efficiency. Cumulatively, the more development that comes forward the greater the potential for negative impact.

**4.7** The prosperity policies are those which support and promote economic well being across the Borough. The policies are concerned with a range of economic issues all of which contribute to prosperity by delivering jobs, growth opportunities and which support the Borough's housing aspirations. The policies include economic development, tourism, community facilities, the rural economy, Burton and Uttoxeter town centres. The retail policies in particular seek to deliver growth and opportunities that support a growing population and which will reduce travel to other centres.

### ***Short/medium/long term impacts***

**4.8** In the short term construction sites will have a negative impact on the environment. Impacts will increase over time as more development sites come forward for delivery but at the same time the mitigation measures such as green infrastructure will also mature and flourish. In the long term the recycling of

brownfield land particularly at Bargates/Molson Coors in Burton upon Trent and JCB in Uttoxeter will attract inward investment and assist with the regeneration of town centres. Overall the policies aim to improve the diversification of the Borough's employment base which will contribute towards improving people's quality of life.

### ***Summary of mitigation measures***

**4.9** The prosperity policies perform well against the economic objectives and the transport objectives. Delivering new and protecting existing employment areas are supported and underpinned by the need to deliver sustainable development by making employment, town and local centres accessible by a range of transport modes. The commitment to protecting existing employment sites is further supported by modification to SP5. Employment development is also encouraged in rural areas. Taken as a whole this suite of prosperity policies seeks to deliver growth whilst respecting and protecting the environment.

### ***Secondary, cumulative or synergistic effects***

**4.10** Synergistic effects include the interaction of other Local Plan policies that reduce the impact of development proposals. Overall, the more development that takes place, the greater potential for negative impacts. However the implementation of some policies, particularly those relating to design, biodiversity, Conservation Areas, community facilities, for example, should enable greater benefits to be achieved.

**4.11** This suite of policies will ensure that environmental considerations are fully taken into account in decision making. Whilst specific policies within the place shaping and prosperity policies also contain references to the environment, this group of policies will contribute to decision making on every application. The environment policies include National Forest, climate change, water management and flooding, renewable and low carbon energy generation, biodiversity and geodiversity, local significant landscapes and Green Belt.

**4.12** This group of policies performs particularly well against the environment objectives such as climate change, green infrastructure and open space, flood risk, countryside and landscape quality and biodiversity. Fewer impacts are recorded against those objectives that relate to development including housing and employment, however the policies as a suite ensure that environmental protection and enhancement is considered for all applications.

### ***Short/medium/long term impacts***

**4.13** In the short term any development sites coming forward will have the potential to negatively impact upon environmental and historic assets but over

time impacts will be mitigated by the inclusion of environmental features in development proposals.

#### ***Summary of mitigation measures***

**4.14** These policies seeks to protect and enhance the built and natural environment of the borough, and should therefore bring a range of environmental benefits, plus social benefits relating to the provision of accessible greenspace and wildlife areas, and recreational opportunities. Protecting the environment could also bring economic benefits, with new businesses attracted to a high quality and attractive area.

#### ***Secondary, cumulative or synergistic effects***

**4.15** The delivery of green infrastructure has the potential to improve development site drainage, provision of wildlife corridors and lessen the impact of development on the countryside.

#### **Detailed Policies**

**4.16** The detailed policies are a collection of policies that provide further amplification and guidance on the strategic policies. Issues covered include design, pollution, the historic environment, trees, advertisements, blue infrastructure and European Sites. Very specific issues are covered that relate to particular development pressures within the Borough.

**4.17** The specific nature of the policies is reflected in the scoring. Individual policies score well against the specific objective that the policy is seeking to promote, protect or resolve. Climate change and design score particularly well against policies DP1 and DP2. A number of objectives have no specific relationship with the policy including green infrastructure, town centre, use of land and biodiversity, all of which are strategic issues and relevant to each and every application and so would be picked up anyway in decision making.

#### ***Short/medium/long term impacts***

**4.18** It is very difficult to appraise the impact of these policies when they have evolved to address key specific issues within the Borough. Impacts will very much depend on the proposals that come forward and the location of those proposals.

#### ***Summary of mitigation measures***

**4.19** These policies provide some of the mitigation measures for the strategic policies by providing further guidance on key policy areas such as sustainability in construction.

*Secondary, cumulative or synergistic effects*

4.20 None identified.

# Chapter 5: Cumulative Effects Assessment

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Table 5.1: Cumulative Effects Assessments

Sustainability Appraisal Objective		Performance	Comments
1	Housing	✓	The housing requirement for the Borough has been derived using the latest sub national population projections and existing housing and employment market. It is considered the strategy meets the current and future housing requirements across the Borough. Policies seek to deliver the housing requirement including ensuring that an appropriate mix is delivered to meet specific local need. Specific policies relate to mix, provision of affordable housing and the needs of gypsies and travellers.
2	Economy	✓	The Local Plan policies support the principle of employment related development in both urban and rural areas. The needs of new and existing businesses are supported along with other opportunities such as tourism and water based recreation within the Borough. Policies seek to deliver new employment within sustainable urban extensions on greenfield sites and protect existing employment land from alternative development. Tourism and town centre policies also support new employment opportunities and growth in these

				employment sectors. The Local Plan does not specifically encourage more high skilled jobs because this will relate directly to the implementation of employment policies and the type of proposals that come forward, however the provision of high quality business parks within the Sustainable Urban Extensions and encouragement of rural diversification will, it is hoped, bring in higher paid jobs and with it higher paid professionals. The creation of employment opportunities within the Borough which can be taken up by residents will reduce the impact of congestion and in-commuting.
<b>3</b>	<b>Transportation</b>	✓	?	In the longer term traffic generation will increase but the impact is uncertain as a number of policies seek to minimise the impact and implement mitigation. Policies seek to deliver growth which is accessible and sustainable. Many of the policies seek to address the impact of proposals particularly in terms of reducing the need to travel and the availability of alternative modes of transport. A proposed modification includes specific reference to the consideration and implementation of the Integrated Transport Strategy.
<b>4</b>	<b>Climate change, energy and air quality</b>	?	-	Transport policies seek to minimise travel and encourage alternative and sustainable modes of transport, however it is accepted that there could be a residual impact on the air quality of the Borough, particularly in Burton upon Trent where there are Air Quality Management Zones, without mitigation.
<b>5</b>	<b>High quality</b>	✓		There are specific policies relating to high

	<b>design and sustainability</b>			quality design and construction. The policy framework is robust in ensuring that design principles are incorporated into development proposals, taking into account the context of the development and surrounding character.
<b>6</b>	<b>Green Infrastructure and Open Space</b>		✓	Green Infrastructure is a key component to the plan with policies in plan to deliver a network of green and open space. Both are considered integral to the delivery of sustainable development, especially for the larger sustainable urban extensions.
<b>7</b>	<b>Town centre</b>		✓	The retail hierarchy policy aims to protect and enhance the role of town and rural centres, whilst also allowing smaller settlements to meet local need.
<b>8</b>	<b>Rural Communities</b>		✓	There are four policies in the plan which will help shape the scale and type of development in the rural area. Whilst the plan focuses most new development to the urban areas, the policies allow for some growth, particularly that which meets existing and future housing, employment and other needs in the rural area such as leisure, retail and community facilities.
<b>9</b>	<b>Flood risk</b>	✓	?	The Local Plan contains a specific policy on flood risk, water management and climate change. Flood risk is a significant issue within the Borough due to the proximity of existing settlements to rivers, Burton upon Trent in particular which has the river Trent run through the centre of the town. A number of the strategic sites are located within various flood risk zones, particularly those within Burton urban area. Schemes will need to be designed to mitigate against the effects of

				flood risk and policies require the use of sustainable urban drainage, reducing the demand for water and need to store water on or off site. The implementation of several policies and mitigation will also help improve water quality, provide areas for recreation and contribute towards the Water Framework Directive.
10	<b>Use of land</b>	✓	-	Overall the plan aims to encourage the best use of land, identifying brownfield sites where they are suitable. Due to the scale of development required, greenfield land will be required which lead to the unavoidable loss of soil and some agricultural land.
11	<b>Natural Resources</b>	✓		Policies address resource use, particularly reusing waste, conserving water, energy efficient design and restoring land
12	<b>Quality of Life</b>	✓		Many policies underpin the quality of life agenda. The delivery of sustainable communities which are supported by facilities and services and provides homes and employment to residents is set out in the policy framework. Policies perform well against this objective.
13	<b>Countryside and Landscape quality</b>	✓	-	Whilst there are specific policies and proposals that seek to integrate good design and local distinctiveness into proposals, including green infrastructure, however the development of greenfield sites, particularly the sustainable urban extensions, will have a negative impact on the surrounding countryside.
14	<b>Biodiversity and Geodiversity</b>	✓	-	The Local Plan contains a specific policy on the conservation and enhancement of biodiversity and geodiversity. There is

				also a specific policy relating to European sites including the Cannock Chase Special Area of Conservation which is located outside the Borough. Many other policies within the policy framework make reference to biodiversity and geodiversity and also encourage design which will optimise enhancement opportunities where they exist. Mitigation measures are incorporated into the policies. Therefore the impact of the plan on this objective will depend on the location and type of proposals submitted to the Council.
15	<b>Water Quality</b>		✓	Policies are considered to perform reasonably well against this objective with water quality being dealt with more explicitly in the current iteration of the plan than previous stages.
16	<b>Historic Environment and Heritage Assets</b>		✓	Policies are considered to perform reasonably well. An additional policy was included following the Preferred Option document which has resulted in the plan assessing well against this objective. Monitoring will be important to make sure there is no deterioration of heritage assets and sensitive historic landscapes.

**5.1** In many cases there is either a positive or mixed effect expected in relation to the sustainability objectives. However, in a number of cases this is likely to depend on the implementation of policies within the Local Plan and the nature of development that comes forward.

**5.2** Taking account of the above, a discussion of the effects of the Local Plan incorporating the modifications is provided which addresses each of the key sustainability issues for the Borough identified in the Scoping Report. The key sustainability issues cover all of the SEA Directive Topics with the exception of soil. For completeness the SEA Topic `soil' is also addressed below to ensure

that the Local Plan takes into account any effects of the plan on this environmental resource.

## **Effects on the Environment**

### ***Conserving and Enhancing Biodiversity***

#### **SEA Topic: Biodiversity and Flora and Fauna**

**5.3** Based on the location of the proposed strategic sites and the proposed requirements for the sites coming forward, it is considered unlikely that the Local Plan will result in a significant adverse direct effect on sites of ecological value or importance. Indeed the spatial strategy as a whole is unlikely to impact upon any European designated sites, as detailed in the Council's Habitats Regulations Screening report and update below.

**5.4** The majority of development will be delivered on greenfield agricultural land on the urban periphery. If any of the strategic sites contain nationally important species the policy framework set out in the Local Plan will mitigate the impact of development and enhancement would be required. The policy framework also ensures that green infrastructure is incorporated into proposals which will assist with creating wildlife habitats and also the linkage between habitats, which is important due to changing climate and migrations patterns of some species. The National Forest policy will also lead to habitat creation and will be delivered alongside planning applications through planning contributions.

**5.5** Greater risk will come from indirect impacts upon species and habitats as a result of an increase in population and within it activities placing pressure on the environment.

**5.6** The planned increase in population over the plan period as a result of new residential development within the Borough and in combination with an increasing population within adjacent districts has the potential to increase recreational pressures on designated sites. This is a particular issue for the Cannock Chase Special Area of Conservation, where the evidence base report has indicated that impacts are, at least in part, related to the volume of people and the footfall from high numbers of visitors. It is important that within 15km of the Cannock Chase SAC boundary applications consider impacts and provide mitigation. The policy reflects the evidence base and therefore when implemented will reduce impacts on Cannock Chase SAC with mitigation. This remains the case with the proposed modification.

**5.7** Other indirect impacts may be the result of air or water quality as a consequence of both development and the increase in traffic associated with it. A further factor that could influence both directly and indirectly biodiversity within the Borough is climate change. The protection, conservation and enhancement of habitats, protected or otherwise, will be important to ensure that habitats and species can adapt and move as the climate changes. The introduction of green infrastructure and the creation of new woodland will contribute to this process. The policy framework in the plan also provides the mechanisms to deliver national Forest which will combat climate change.

### ***Flood Risk***

#### **SEA Topic: Water**

**5.8** Flood risk is a major issue within the Borough, particularly in Burton Upon Trent and Uttoxeter. The vast majority of proposed new development within East Staffordshire is located within the towns of Burton upon Trent and, to Uttoxeter. The rest of the development sites are scattered around the rural areas of the Borough. There can be direct flooding events which will impact upon new and existing communities and premises. There is also the potential to increase flood risk within the Borough due to additional run off associated with new development. Burton in particular has smaller watercourses within its urban areas which pose a threat from run-off, as opposed to flooding events directly. This is also the case in Uttoxeter where some of the smaller unmodelled water courses may pose a risk of flooding to any development sites along their banks. A number of the strategic sites will require mitigation to reduce the impact of flood risk.

**5.9** There is a specific policy within the Local Plan which deals with water management and flooding. The policy states that all development will need to include Sustainable Urban Drainage systems to minimise the impact of surface water run-off. The provision of green infrastructure and National Forest planting is also a benefit in that it provides land within development sites that can act as a natural soakaway and reduce the potential impact of surface water run-off. The policy also refers to water quality, contributing towards meeting the Water Framework Directive.

**5.10** The Water Cycle Strategy identifies that the flood risk associated with sewer, groundwater and overland flooding is of minor risk within the Borough.

**5.11** Climate change is also anticipated to increase the areas at risk of flooding within the Borough in the longer term. The Environment Agency's River

Catchment Management Plan for the Trent indicates that Burton has received flood alleviation schemes in the form of raised flood banks along the river and major flood protection schemes within the town itself. The Management Plan recognises that Burton is at risk of flooding and that the level of risk is set to increase into the future. Further investment will be necessary to maintain and improve the flood defences on the River Trent and its tributaries to ensure that overtopping does not occur in the future. National guidance indicates that climate change needs to be taken into account when preparing evidence to support planning applications.

### ***Water Demand***

#### **SEA Topic: Water**

**5.12** In the medium to long term it is anticipated that the demand for water will increase as a result of the population rising and also from any new requirements from businesses locating within the Borough. This needs to be considered in conjunction with the potential implications of a changing climate, which could act as a driver for increased water demand, particularly if new weather patterns result in a drier or hotter climate. Hosepipe bans, although not in force across the West Midlands, were instigated across much of the UK in 2012 due to a drier winter than usual resulting in lower reservoir levels. This could have indirect adverse effects on the biodiversity of the Borough if insufficient water is available to support the environment.

**5.13** Water demand will also increase not just because the population is growing as a consequence of new development but also because both new and existing households consume more water in their appliances. All of which, will place pressure on existing supplies and water infrastructure in the Borough.

**5.14** South Staffordshire Water is responsible for drinking (potable) water supply and distribution network. The SSW network is robust with the five strategic service reservoir supply areas; however the infrastructure may restrict water supply within and around Burton upon Trent and Uttoxeter in the longer term. As a stakeholder in the planning process and because SSW have a duty to maintain the security of their supplies any development coming forward in the Local Plan will need to contribute to any necessary water infrastructure.

**5.15** Policies within the plan, particularly those relating to energy efficiency and low carbon development emphasise the importance of water efficiency.

## **Air Quality**

### **SEA Topic: Air**

**5.16** The impacts on air quality can be both short and long term. In the short term there is potential for airborne dust/soil associated with the construction phase of development. Lorry movements can carry dust/soil out of the site and into adjacent neighbourhoods. With the redevelopment of brownfield sites particularly there is potential for the excavation and disposal of existing built structures, concrete plinths, building foundations and car parking areas. It is likely that this building material will be broken down and crushed on site and either used as foundations for the new development or moved from the site and used elsewhere. The crushing process will lead to a reduction in air quality in the immediate locality for neighbouring properties. National guidelines in the form of the Site Waste Management Plans Regulations (2008) will ensure that a developer mitigates the impact of re-using, recycling recovery and disposal of all waste types generate by the development of a site. Detailed Policy 2 expects that developments will include the use of local and sustainable sources of materials, and where appropriate Site Waste management Plans prepared.

**5.17** In the longer term it is uncertain whether traffic generation will increase. The plan aims to allocate development in greenfield edge of town locations which may increase the need to travel in the short term but as infrastructure is delivered, particularly public transport, green infrastructure and cycle routes there is the potential for this to reduce car travel in the longer term. As a consequence there is potential for air quality to reduce over time. As cars become cleaner in their emissions there is also the potential that emissions will be reduced, as evidenced in national monitoring. The Borough already has air quality issues with two air quality management areas (AQMA's) declared in Burton upon Trent due to exceedences in nitrogen dioxide levels. Road traffic is identified as the most significant nitrogen dioxide contributor. The first large AQMA is located at the Derby Turn roundabout and the roads that lead away from it and the second smaller AQMA is located to the St Peter Bridge roundabout and part of St Peter Street in Stapenhill. The location of the first AQMA is at one of Burton's major intersections on the edge of the town and within Inner Burton where several key transport corridors meet.

**5.18** A number of mitigation measures have been included in the Local Plan to try and reduce the potential impact. A proportion of development is directed to the North West urban edge of the town, with one site a change of use which could reduce contributions to emissions. The plan policies also seek to minimise the impact of traffic by ensuring that sites are accessible by a variety of modes of sustainable transport. The Sustainable Urban Extensions will meet the needs of

its residents and business thus avoiding unnecessary travel. To mitigate the impact of additional traffic at the Branston A38 junction which will service the majority of development assigned to the strategic crescent to the south of the town, the developers will need to ensure that the appropriate highways infrastructure is in place that will allow the free flow of traffic. It is not possible to predict the significance of this impact, however it is recognised that there could be a residual negative impact.

### ***Greenhouse Gas Emissions*** **SEA Topic: Climatic Factors**

**5.19** Additional energy use and travel within the Borough are likely to result in increased greenhouse gas emissions. It is difficult to predict with accuracy the specific impact associated with climate change because so many factors contribute to it, many outside the planning system, and it is difficult to disassociate the impact within the Borough from a national or global trend.

**5.20** The policy framework in the Local Plan seeks to reduce the significance of any increases in emissions as a result of new development through a number of mitigation measures. The settlement hierarchy approach is based on access to facilities and services, with an aim to try and focus new development in the most sustainable locations. The policy framework also seeks to retain existing services and facilities.

**5.21** The plan as a whole seeks to minimise the impact of transport by co locating growth in the sustainable urban extensions, supported by well designed communities which incorporate opportunities for alternative modes of transport. The sustainable urban extensions will also deliver services and facilities which support growing communities such as local shops, play equipment, open spaces and education establishments. Employment opportunities are also provided for in some sustainable urban extensions allowing residents to have access to opportunities.

**5.22** Sustainable Urban Extensions will be expected to incorporate renewable or low carbon energy supply on a district-wide or decentralised basis and design in sustainable construction including energy efficiency measures, low carbon energy supply, environmental best practice. These policies in combination with the policies which minimise travel will off-set the impact of development on the climate.

## ***Cultural Heritage***

### **SEA Topic: Cultural Heritage, including archaeological and architectural heritage**

**5.23** The emerging policy framework is considered to perform reasonably well, however a specific impact is likely to depend on the nature of development that comes forward over the plan period.

**5.24** The Branston Depot strategic site in Burton had a positive impact on this indicator because it would bring back into use a vacant and dilapidated listed building. In general a number of strategic sites are located close to conservation areas, particularly in the rural areas due to the smaller nature of the settlements. The additional growth assigned to Burton and Uttoxeter places additional pressures on the conservation areas in these two urban areas. It is important to conserve and enhance those buildings that are special and define these settlements through character and local distinctiveness.

**5.26** The proximity of strategic sites to heritage assets (conservation areas/listed buildings) or the archaeological potential of these sites may have a potential negative impact - but it will depend on the proposals that come forward and early site investigations. The policy framework of the Local Plan will ensure that the heritage assets are appropriately considered.

**5.27** To ensure that the Council balances the need to grow with the need to protect its historic assets a review of conservation areas across the Borough is underway.

## ***Reduction in Waste sent to Landfill***

### **SEA Topic: Waste**

**5.28** Additional development within the Borough is likely to result in the generation of additional waste, ranging from materials associated with the development of new sites to additional waste generated by the occupants of new properties and premises.

**5.29** The redevelopment of brownfield sites may lead to the clearance of existing built structures including concrete hardstanding and foundations prior to construction of new premises. Site clearance will generate waste some of which may require off-site disposal. Site clearance will generate an increase in traffic through lorry movements to take waste to landfill which in combination could further impact upon air quality. This is a short term impact associated with the construction phase of development. The majority of development is on greenfield

land in large sustainable urban extensions, which will avoid large quantum of waste being generated from the redevelopment of brownfield sites.

**5.30** National guidelines in the form of the Site Waste Management Plans Regulations (2008) will ensure that a developer mitigates the impact of re-using, recycling recovery and disposal of all waste types generate by the development of a site. Site Waste management Plans will reduce the waste streams to landfill.

**5.31** The Local Plan expects that developments will include the use of local and sustainable sources of materials, and where appropriate Site Waste Management Plans should be prepared to ensure that at least 25% of the total minerals used derive from recycled and reused content. This policy will also divert waste from landfill by providing a legitimate destination for materials. This target is considered realistic due to the existing and current quarrying in the Borough and availability of minerals.

**5.32** The specific policy relating to sustainable urban extensions expects proposals to incorporate local waste management facilities and neighbourhood waste management facilities for the separation, storage and collection of waste to increase the efficiency of its subsequent re-use, recycling and treatment. The provision of facilities will reduce the need for trips to municipal waste facilities in the long term.

### ***Landscape and Countryside Character***

#### **SEA Topic: Landscape**

**5.33** The biggest changes to landscape and countryside character over the plan period results from National Forest planting and new development in edge of town greenfield locations.

**5.34** Nearly 8 million trees have already been planted (as at August 2011) with woodland cover across the Forest area increasing from around 6% to over 18%. Thousands of hectares of farmlands have been converted to woods and many former derelict coalfield land and mineral workings have been transformed. The impact of National Forest planting on landscape and countryside character is long-term because it will evolve and develop over time as habitats grow and mature. In changing the landscape there are other benefits which will emerge such as access to the countryside, the health and well being of residents and the creation of new habitats.

**5.35** The other area of greatest change will be on the urban periphery in response to the development of strategic sites, in particular the large sustainable

urban extensions. The SA has taken into account landscape issues in the identification of the sites and associated landscape sensitivity. One of the overriding factors was the ability of sites to integrate Green Infrastructure into proposals which would include National Forest planting. Whilst development will inevitably lead to a loss of landscape and countryside character, development proposals will mitigate this impact.

## **Soil**

**5.36** Soil conservation is not a key sustainability issue identified within the Borough and the SA process captures this issue under the Use of Land criteria. To ensure that the SA Directive is complied with this section is necessary to ensure that all SEA topics are covered. Soil conservation is not a key issue because the majority of soils are either Grade 3 or Grade 4 and less important in terms of the Agricultural Land Classification system. However, the development of large greenfield sites will lead to the loss of soils that cannot be replaced. This loss is not avoidable but the need to deliver growth outweighs this.

## **Social**

### ***Health inequalities***

#### **SEA Topic: Human Health**

**5.37** There are significant issues in East Staffordshire include long-term illness, mental health, particularly among the unemployed, and, in some rural communities, coronary heart disease and diabetes.

**5.38** There is a specific policy which seeks to address health inequalities by encouraging green infrastructure, limiting certain uses which are associated with poor health and considerations of joined up working with delivery partners. This alongside the implementation of other policies in the plan, particularly those relating to green and blue infrastructure, open space, sport and recreation and tree planting will contribute towards improving the health of the Boroughs population. Much of this will depend on the implementation of the policy and partnership working with organisations.

**5.39** The Plan seeks to deliver employment opportunities across the Borough through the provision of a portfolio of employment sites which will deliver a range of jobs in accessible places. The ability to transform unemployment into employment will help to raise the aspirations of Borough residents and it is hoped address in part health inequalities. In combination the policies in the plan provide opportunities for health to be raised.

### ***Access to Open Space***

#### **SEA Topic: Population and Landscape**

**5.40** There are significant shortfalls in the provision of public open space in some of the older housing areas of the Borough, particularly Burton on Trent.

**5.41** There are a number of policies that will deliver open space provision in new developments and contribute to open space elsewhere. The policies are supported by the Council's Supplementary Planning Document 'Open Space' which provides robust open space standards and it is important that this document is kept up to date throughout the plan period.

### ***Safer Communities***

#### **SEA Topic: Population**

**5.42** East Staffordshire has slightly higher levels of recorded crimes than Staffordshire County Council for burglary, vehicle and violent crimes. Vehicle crime and violent crime tend to be concentrated in Burton Town Centre.

**5.43** The design policy makes reference to secure by design and aims to contribute towards reducing crime. The Local Plan also aims to revitalise town centres to ensure they are used throughout the day. This will contribute towards natural surveillance and overall appearance of the town centre, with more areas being used and less anti social areas.

### ***Multiple Deprivation***

#### **SEA Topic: Human Health and Population**

**5.44** East Staffordshire experiences a number of socio-economic problems, within the Borough there are four lower super output areas that are within the top 10% most deprived in England. These are within Eton Park, Stapenhill, Shobnall and Winshill.

**5.45** Brownfield sites are encouraged to come forward in the Borough's urban areas to underpin the regeneration of areas and improve the environment. The Council's Design Supplementary Planning Document in combination with the design policies in the Local Plan will support the quality of proposals that gain approval.

## ***Ethnic Minorities***

### **SEA Topic: Population**

**5.46** Around 8% of the population of East Staffordshire are from Black or Minority Ethnic (BME) background. Burton has the most concentrated BME population in the County with a strong representation from Pakistani backgrounds.

**5.47** There isn't a specific policy which responds to the needs of BME communities. In many respects the plan seeks to treat communities and populations of people equitable. The housing policies aim to meet the needs of the community, which will include those of our ethnic population, by ensuring sites deliver a mix of types and tenures.

## ***Poor Accessibility in Rural Areas***

### **SEA Topic: Population**

**5.48** Those living in rural areas who do not own cars or are poorly served by public transport inevitably suffer from a degree of social exclusion from larger strategic facilities that are only provided in a small number of locations. Strategic facilities need to be delivered where there is the most need and in sustainable locations where the majority of people can access them. For this reason small rural settlements will never be able to provide strategic facilities. However, the spatial strategy seeks to deliver growth across the Borough and in all settlements to ensure that services and facilities are supported in rural areas. Such facilities will allow daily needs to be met to a walk-in catchment. The settlement hierarchy includes an assessment bus travel as a way of identifying which settlements should receive more growth.

## ***Housing Affordability in Rural Areas***

### **SEA Topic: Population and Landscape**

**5.49** East Staffordshire has substantial rural areas where pressure exists to provide homes affordable to local people who wish to remain living in the area. The Local Plan will deliver additional housing over the lifetime of the plan, increasing stock and opportunities for people to live within the Borough.

**5.50** Affordable housing need in rural areas is a difficult issue for the Council to tackle because it is not just simply about delivering growth to our rural communities in the hope that some of it will be taken up by local people. Affordable housing in a settlement requires a parish survey which results in very specific needs being identified which present a snap shot of needs at one particularly time. Needs change and evolve overtime reflecting the community as it grows and as the population changes. The spatial strategy and policies relating

to rural exception sites will allow flexibility over the plan period and permit developments that meet a need.

## **Economic**

### ***Unemployment Trend and Economic Activity***

#### **SEA Topic: Population and Material Assets**

**5.51** The current financial situation is impacting on the economy of the Borough as well as the national economy. There is uncertainty about the timescales over which there will be changes to the national trends, which impacts on the certainty of changes to the local economy. Despite this unemployment in the Borough is below the County, Regional and National averages, with some pockets of the Borough around Shobnall, Winshill, Stapenhill and Horninglow having low economic activity rates. The Council's Housing Requirements and SHMA Update identifies that East Staffordshire had more jobs (employment) within the authority than people in employment, resulting in East Staffordshire being a net importer of labour and as a consequence increasing commuter congestion. Additionally, youth unemployment is relatively high at 31.4%, which is similar to the national level. The Strategy aims to increase housing to rebalance the relationship.

**5.52** The creation of well designed, high quality business parks associated with the sustainable urban extensions will bring in businesses that attract higher paid professionals, which will have benefits for the town as a whole, particularly with the delivery of mixed housing sites to accommodate a range of housing needs.

**5.53** To ensure that job opportunities are available for take-up by residents in the Borough there will be a portfolio of sites available which will deliver a range of employment opportunities which, it is hoped, will appeal to as many residents as possible thereby reducing the pockets of low economic activity rates. By providing opportunities for employment growth within the Borough that can be taken up by residents will contribute to reducing traffic congestion and in-commuting.

### ***Town Centre Viability and Vitality***

#### **SEA Topic: Population and Material Assets**

**5.54** Burton upon Trent and Uttoxeter town centres face a number of challenges over the plan period including competition from neighbouring centres and the diversity of the town centre offer. The retail hierarchy policy relate to addressing specific challenges relevant to Burton and Uttoxeter town centres.

**5.55** Delivering new development in the town centres will have a positive impact on the ability of town centres to cater for the needs of the Borough without residents needing to travel to Lichfield or Derby. Reducing travel into and out of the Borough will have a positive impact on the main transport corridors particularly the A38 and A50. Delivering more development will however have a transport impact in the town centre, which already suffers from congestion at peak times and poor air quality. The town centres are sustainable locations, well served by public transport, cycling and walking routes. Town centres also co-locate land uses making it easier to combine the need to travel with the ability to do several things e.g., shopping, leisure, education - which will positively address the potential for extra car journeys.

**5.56** Development in the town centre has the potential to bring back into use listed buildings or develop conservation areas. The impact of development on the town centre historic assets will depend on the proposals coming forward and implementation of policy. However the design and historic policies in the Local Plan will safeguard against inappropriate design or development. Town centre development will contribute to the quality of the town centre environment, and make East Staffordshire a desirable place to live. As part of town centre proposals the Council will need to secure highway improvements to ensure the free flow of traffic through the town. Adequate parking will also be a consideration. The strategy aims to improve the position of Burton and Uttoxeter in relation to national retail standings, both of which have slipped in recent years.

### ***Summary of mitigation measures***

**5.57** The delivery of development is offset by individual policies which seek to mitigate impacts. In particular Strategic Policy 24 ensures high quality design which is integral to delivering well planned, safe and locally distinct development which considers the existing context and promotes accessibility. Strategic Policy 24 delivers green infrastructure which is a key principle driving forward the growth strategy for the Borough. The benefits to the development scheme and individuals quality of life is enhanced by the provision of green infrastructure however its purpose is also as a way of introducing wildlife corridors and green walking and cycling routes in addition to the more obvious amenity provision. The delivery of Sustainable Urban Extensions also provides a coherent approach to delivering growth and at the same time reducing its impact.

**5.58** Previous sustainability appraisal work, recommended several changes which would act as mitigation measures to potential negative impacts. These included:

- Amending plan objectives to include a mix of dwellings, protecting sensitive environments mitigation measures, sustainable design, green infrastructure, flood risk, local distinctiveness
- Amending the Sustainable Urban Extensions Policy to include Sustainable Drainage Systems
- Amending the Green Infrastructure Policy to include the creation, protection and enhancement of biodiversity habitats
- Amending the Open space policy to make reference to amenity space for non residential developments
- Amending employment policies to make reference to highway and environmental impacts from new employment development in urban areas
- Greater reference to European Sites in the hierarchy of designated sites and including a specific European Sites policy

**2.93** These recommendations are still contained in the Local Plan policies and contribute towards the mitigation of possible negative effects aswell as ensuring the plan is more sustainable. Where there are outstanding potential negative effects, further discussion on mitigation measures is set out below.

Table 2.2 Mitigation measures

Policy	Possible negative or uncertain effect	Mitigation	Comments
<p><b>SP2: A strong network of sustainable settlements</b></p>	<ul style="list-style-type: none"> <li>• Climate change effects through increased need to travel elsewhere.</li> <li>• Negative effect in terms of loss use of land due to increased greenfield sites being required and extension of settlement boundaries</li> </ul>	<p>East Staffs approach to Sustainable Development</p>	<p>Whilst climate change effects have been identified, it is considered that having a specific policy on what East Staffordshire Borough Council consider sustainable development will reduce these impacts by ensuring development is in the right location, is of the highest quality and provides necessary infrastructure.</p>
<p><b>SP3: Provision of Homes and Jobs and SP4 and SP5: Distribution of housing and employment growth</b></p>	<ul style="list-style-type: none"> <li>• Climate change effects through significant development over the plan period.</li> <li>• Potential negative effects on the transport network</li> <li>• Increased resource use through increased population and development</li> </ul>	<p>Low Carbon and Renewable energy policies</p> <p>Designing in Sustainable Construction Policies</p> <p>East Staffordshire District Integrated Transport Strategy</p> <p>Infrastructure Development</p>	<p>Climate change effects will be reduced through the delivery of green infrastructure and tree planting which will contribute to the reduction in carbon emissions, encourage more sustainable modes of transport and enable species to move between habitats.</p> <p>Designing in sustainable construction encourages reusing materials where possible, incorporating recycling facilities once</p>

	<ul style="list-style-type: none"> <li>• Impacts on landscape as a result of large greenfield extensions</li> <li>• Negative effects on use of land due to large greenfield development</li> </ul>	<p>Plan</p> <p>Landscape policy and Planning for Landscape Change SPD</p> <p>Sustainable Transport and Accessibility Policy</p> <p>Green Infrastructure Policies</p> <p>East Staffs approach to Sustainable Development</p>	<p>the development is completed and adopting most up to date environmental standards which will reduce resource use.</p> <p>The landscape policy and future SPD will enable the design of developments to consider most up to date information and sensitivities on landscape</p> <p>Whilst the plan will result in the loss of greenfield land, the policy setting out the approach to sustainable development also encourages the use of brownfield land.</p>
<p><b>SP7: Sustainable Urban Extensions</b></p>	<ul style="list-style-type: none"> <li>• Flood risk effects on some sites through increased run off</li> <li>• Negative effects on use of land due to large greenfield development</li> <li>• Negative effects on landscape due to development</li> </ul>	<p>Flood risk, climate change and water management policy and SFRA</p> <p>Landscape Policy and Planning for Landscape Change SPD</p> <p>East Staffordshire approach to sustainable development</p>	<p>The flood risk policy sets clear guidance on addressing flood risk as part of developments. In addition, the SFRA includes up to date flood modelling and data which will assist the correct location of developments within flood areas so that vulnerable uses are not located in flood risk areas. The policy also advocates the deculverting of watercourses which will contribute to</p>

	<p>taking place on currently undeveloped land</p> <ul style="list-style-type: none"> <li>• Possible negative effects on biodiversity on SUE's</li> </ul>	<p>Policy</p> <p>Biodiversity and geodiversity Policies</p> <p>Green Infrastructure Policy</p>	<p>reducing flood risk on sites and nearby areas.</p> <p>The landscape policy and future SPD will enable the design of developments to consider most up to date information and sensitivities on landscape</p> <p>The biodiversity and geodiversity policy encourages biodiversity protection and enhancement. In addition, the creation of green infrastructure on SUE's provide the opportunity for biodiversity enhancement and where appropriate diversification.</p>
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# Chapter 6:

## Habitats Regulations Assessment Update

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**6.1** The Habitats Regulations<sup>6</sup> transpose the requirements of the Habitats Directive into domestic legislation. The Habitats Directive states that:

*'Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives of the sites'.*

**6.2** Habitats Regulations Assessments (HRA) require a different methodology to sustainability appraisal but the two work in tandem. A separate HRA has been prepared to support the Local Plan. The modifications to the plan do not alter the Habitat Regulations Assessment as they do not lead to increased significant effects on European Sites. A Modification alters Detailed Policy 11: European Sites, mainly the text relating to Cannock Chase SAC. This modification reflects the progress made by the Cannock Chase Partnership since the plan was prepared with regards to mitigating the effects of development within a zone of where the majority of visitors to Cannock Chase SAC live. The modification enables the delivery of detailed mitigation of the development set out in the plan. Overall it is not considered that the modifications proposed result in a refreshed Habitat Regulations Assessment being required with the conclusions set out in Doc. C23 still relevant.

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<sup>6</sup> The Conservation of Species and Habitats Regulations 2010