

# Local Plan Pre-Submission Sustainability Appraisal Report



OCTOBER  
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## Table of Contents

	<b>Page Number</b>
<b>Chapter 1</b> Non Technical Summary	<b>1</b>
<b>Chapter 2</b> Background and Introduction to the Sustainability Appraisal	<b>22</b>
<b>Chapter 3</b> Sustainability Appraisal Methodology	<b>33</b>
<b>Chapter 4</b> Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope	<b>49</b>
<b>Chapter 5</b> Stage B: Testing Plan Objectives (Task B1), Developing and refining Spatial options (Task B2), and Assessing potential effects of the Strategic options (Task B3)	<b>61</b>
<b>Chapter 6</b> Stage B: Testing Plan Objectives (Task B1), Developing and refining Spatial options (Task B2), and Assessing potential effects of the Strategic options (Task B3)	<b>113</b>
<b>Chapter 7</b> Task B5: Cumulative Effects Assessment	<b>153</b>
<b>Chapter 8</b> Task B6: Proposed Monitoring	<b>174</b>
<b>Chapter 9</b> Conclusions and Next Steps	<b>190</b>
Glossary	<b>18</b>

## Appendices

	Page Number
Appendix A <b>Task A: SA Framework</b>	1
Appendix B <b>Task A: Setting the baseline</b>	11
Appendix C <b>Task A: Key Sustainability Issues for East Staffordshire Borough</b>	24
Appendix D <b>Task B: Sustainability Appraisal of the Pre-Submission Local Plan Strategic</b>	28

	<b>Objectives</b>	
Appendix E	<b>Task B: Sustainability Appraisal of the Spatial Options</b>	34
Appendix F	<b>Sustainability Appraisal of Strategy Options 2a-d</b>	50
Appendix G		73
Appendix H	<b>Task B: Strategic Sites Appraisal Pre-Submission Local Plan Policies Appraisal</b>	169
Appendix I	<b>Flood Risk Assessment and Water Framework Directive</b>	241
Appendix J	<b>Evidence Base used in Sustainability Appraisal</b>	244
Appendix K	<b>Comments on Sustainability Scoping Report 2007</b>	245
Appendix L	<b>Comments on Sustainability Appraisal Scoping Report 2012</b>	266
Appendix M	<b>Comments on Interim Sustainability Appraisal October 2012</b>	318

## Figures

	<b>Page Number</b>
<b>Figure 1.1</b> Burton upon Trent, Barton under Needwood, Tutbury and Rolleston Strategic Site Allocations	<b>11</b>
<b>Figure 1.2</b> Uttoxeter and Rocester Strategic Site Allocations	<b>12</b>
<b>Figure 2.1</b> Burton upon Trent, Barton under Needwood, Tutbury and Rolleston Strategic Site Allocations	<b>24</b>
<b>Figure 2.2</b> Uttoxeter and Rocester Strategic Site Allocations	<b>25</b>
<b>Figure 2.3</b> Process Diagram	<b>28</b>
<b>Figure 3.1</b> The Spatial Options	<b>37</b>
<b>Figure 3.2</b> Refinement of options	<b>38</b>
<b>Figure 3.3</b> 2a Concentrating growth on two sites in Burton and some growth in Uttoxeter and strategic villages	<b>39</b>
<b>Figure 3.4</b> 2b concentrating most growth in the Outwoods and Stretton areas of Burton and some development in Uttoxeter and the strategic villages	<b>39</b>
<b>Figure 3.5</b> 2c more dispersed growth surrounding Burton and some development in Uttoxeter and the strategic villages	<b>40</b>
<b>Figure 3.6</b> 2d concentrating growth in the South of Burton and some development in Uttoxeter and the strategic villages	<b>40</b>
<b>Figure 3.7</b> Geographic Location of Strategic Sites	<b>41</b>
<b>Figure 5.1</b> Refinement of Options	<b>84</b>
<b>Figure 5.2</b> 2a Concentrating growth on two sites in Burton and some growth in Uttoxeter and strategic villages	<b>84</b>
<b>Figure 5.3</b> 2b concentrating most growth in the Outwoods and Stretton areas of Burton and some development in Uttoxeter and the strategic villages	<b>85</b>
<b>Figure 5.4</b> 2c more dispersed growth surrounding Burton and some development in Uttoxeter and the strategic villages	<b>85</b>
<b>Figure 5.5</b> 2d concentrating growth in the South of Burton and some development in Uttoxeter and the strategic villages	<b>86</b>

## Tables

		<b>Page Number</b>
<b>Table 1.1</b>	SA objectives	<b>3</b>
<b>Table 1.2</b>	Spatial Options	<b>8</b>
<b>Table 1.3</b>	Strategic Options	<b>9</b>
<b>Table 1.4</b>	Glossary	<b>18</b>
<b>Table 2.1</b>	Process Diagram	<b>28</b>
<b>Table 2.2</b>	Environmental Report Requirements	<b>31</b>
<b>Table 3.1</b>	Burton Strategic Sites	<b>42</b>
<b>Table 3.2</b>	Uttoxeter Strategic Sites	<b>42</b>
<b>Table 3.3</b>	Strategic Villages - Strategic Sites	<b>42</b>
<b>Table 3.4</b>	Sites Sustainability Appraisal Framework	<b>43</b>
<b>Table 4.1</b>	Plans and programmes Reviewed	<b>50</b>
<b>Table 4.2</b>	Sustainability Appraisal Framework Objectives	<b>56</b>
<b>Table 4.3</b>	Objective Compatibility	<b>57</b>
<b>Table 5.1</b>	Local Plan Strategic Objectives	<b>63</b>
<b>Table 5.2</b>	Sustainability Appraisal Objectives	<b>65</b>
<b>Table 5.3</b>	Spatial Options	<b>72</b>
<b>Table 5.4</b>	Sustainability Appraisal of Spatial Options	<b>73</b>
<b>Table 5.5</b>	Sustainability Appraisal of Strategic Options	<b>87</b>
<b>Table 5.6</b>	Significant negative effects associated with the Council's Preferred Strategic Option	<b>97</b>
<b>Table 6.1</b>	Options Appraisal key	<b>114</b>
<b>Table 6.2</b>	Appraisal of 4 growth scenarios	<b>114</b>

<b>Table 6.3</b>	Appraisal of alternative strategies	<b>116</b>
<b>Table 6.4</b>	Appraisal of alternative sites	<b>118</b>
<b>Table 6.5</b>	Appraisal of alternative sites	<b>120</b>
<b>Table 6.6</b>	Pre-Submission Plan Objectives	<b>128</b>
<b>Table 6.7</b>	Key for sustainability appraisal	<b>130</b>
<b>Table 6.8</b>	Appraisal of Plan Objectives	<b>130</b>
<b>Table 6.9</b>	Strategic Site Allocations	<b>132</b>
<b>Table 6.10</b>	Strategic Site Allocations Appraisal – Burton upon Trent	<b>134</b>
<b>Table 6.11</b>	Strategic Site Allocations Appraisal – Uttoxeter and Strategic Villages	<b>135</b>
<b>Table 6.12</b>	Policy Appraisal Key	<b>143</b>
<b>Table 6.13</b>	Strategic Policy Appraisal	<b>144</b>
<b>Table 6.14</b>	Strategic Policy Appraisal	<b>145</b>
<b>Table 6.15</b>	Strategic Policy Appraisal	<b>148</b>
<b>Table 6.16</b>	Detailed Policy Appraisal	<b>150</b>
<b>Table 7.1</b>	Cumulative Effects Assessments	<b>153</b>
<b>Table 7.2</b>	Mitigation Measures	<b>171</b>
<b>Table 8.1</b>	Proposed monitoring of significant effects table	<b>175</b>

## **How to Comment**

This document is submitted for consultation in conjunction with the Local Plan Pre-Submission Development Plan Document. Comments on this Sustainability Appraisal Report are welcomed, and will be taken into account as the Local Plan is examined. Comments can be submitted on-line via the Council's website (<http://eaststaffsbc-consult.limehouse.co.uk/portal>), or written comments can be made. Comments should be received by 12:00pm on 29<sup>th</sup> November 2013.

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## **What we will do with your comments**

Following consultation, all representations received will be acknowledged and made available for examination. Therefore, all representations received on the Local Plan and SA Report become public documents and cannot be kept confidential.



# 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. A glossary of terms is provided in Table 1.5 below. 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 Sustainability Appraisal (SA) Report which has been prepared by East Staffordshire Borough Council to support the Pre-Submission Local Plan in line with the relevant legislation and guidance.

**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).

### Sustainable Development

**1.4** 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'*.

**1.5** 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;

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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

- Prudent use of natural resources; and
- Maintenance of high and stable levels of economic growth and employment.

**1.6** 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 Plan in the delivery of Sustainable Development**

**1.7** 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 there will be no social, economic or environmental impacts.

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

**1.8** 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.

**1.9** 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.

**1.10** The Local Plan Pre-Submission document 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.

**1.11** Throughout the development of the Pre-Submission, the Council has undertaken a process of Sustainability Appraisal (SA) incorporating the requirements of Strategic Environmental Assessment (SEA).

**1.12** 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.

### **Methodology**

**1.13** 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. For example, under the housing objective the following questions have been included in the methodology:

- Will it encourage more access to affordable housing?
- Will it encourage access to decent housing?
- Will it provide an appropriate mix of housing to meet residents' needs and aspiration and create balanced communities?
- Will it reduce the number of unfit and empty homes?
- Will it reduce the level of homelessness in the Borough?

**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)

The following SA documents have been produced:

<b>Scoping Report (June 2007)</b>	A Scoping Stage is required as part of the SA which involves setting the context for the appraisal by considering environmental, social and economic baseline information, and relevant plans and programmes. This includes identifying key sustainability issues and characteristics, and outlining the SA framework which will be used to carry out the appraisal. The SA framework consists of 16 objectives which cover a number of topics including a range of social, environmental and economic issues. The SA objectives are listed below.
<b>Revised Scoping Report (February 2012 – March 2013)</b>	It was necessary to refresh the Scoping Report in 2012 due to the time elapsed between 2007 and 2012, to take into account plans, programmes, strategies and initiatives published and updated since 2007 as well as those identified by stakeholders during consultation on the draft Scoping Report. It was also felt that additional/up-to-date baseline information need to be included to take into account comments on the baseline received during consultation on the draft Scoping Report and the emerging Local Plan evidence base.
<b>Interim Sustainability Appraisal (July - September 2012)</b>	This document used the SA framework to appraise the spatial objectives, strategic and detailed planning policies as well as development strategy and detailed site options

## The character of East Staffordshire Borough

**1.14** East Staffordshire covers 150 square miles located in strategic position on the edge of the West Midlands. The Borough is characterised by a mix of urban, semi-rural and rural areas with Burton upon Trent being the area's commercial and economic centre, dominating employment and housing provision and Uttoxeter the Borough's second town, a traditional market town with links to the Staffordshire Moorlands and Stafford Borough. The large rural area is supported by a number of villages and hamlets with 25% of the borough's population classified as living in a rural area.

**1.15** As at 2011 the population of the Borough is 113,600, an increase of 9.5% from 2001, higher than the county wide figure of 5.2% and national figure of 7.9%. Population has grown for all age groups over the age of 40 but reduced for the 5-14 age groups. The under 4 age group has increased by 10% over last 10 years, creating an additional need for primary school places. A total of 8% of the population come from an ethnic minority background, a figure that has increased since 2001. There has also been an increase in economic migrants (Polish / Eastern European), particularly in parts of Burton upon Trent. Projections show that East Staffs population will grow by 22% up to 2035 compared with 19% for England, with an increase in the numbers of children aged under 16 and an increase in working age people aged 16-64. In addition there will be significant growth in people aged 65 and over particularly elderly residents over 80.

**1.16** A total 54,000 residents are economically active, equivalent to 77.5% of the working age population. A higher proportion of workers employed are semi-skilled with a lower proportion of workers (not residents) employed as managers/professionals. Unemployment rates in the Borough are lower than the rates for West Midlands and England. Unemployed residents predominantly live in 'Inner Burton wards'. Earnings are in line with regional rates of pay.

**1.17** Levels of new build have been low with poor viability limiting new affordable housing. There is a large private rented sector - estimated to be 16% compared to 13% social rented. There are poor housing conditions in some private rented sector and significant numbers of owner-occupiers living in unsuitable housing. Fuel poverty an on-going issue for some households

**1.18** Relatively high proportion of short work trips in Burton and high proportion of commuter trips by car from surrounding towns & villages. Only 4% of work journeys in the Borough are by bus and less than 1% are by train. Walking and cycling rates are above the national average. Traffic congestion has contributed to the declaration of two Air Quality Management Areas in Burton along the A5121/ A511 and A444 St. Peter's Bridge.

**1.19** Overall Life Expectancy for men in East Staffordshire is 77.1 years, below the national average of 78.3 and is lower in 13 of the 21 wards in the

Borough. Alcohol admission rates are increasing and obesity levels have risen to 20%, higher in inner Burton. Only 12% of the adult population achieve 5 x 30 minutes of physical activity per week and 51% of the adult population are inactive.

**1.20** The Borough contains, perhaps, the most varied landscape character in Staffordshire, bounded by the Rivers Dove and Trent, the landscape rises to the Needwood Plateau in the central part of the Borough and to the north, the landscape begins to resemble the English uplands. The Borough boasts wildlife sites of national and local value with 6 Sites of Special Scientific Interest, 3 Local Nature Reserves, 161 Sites of Biological Importance and at least 2500 hectares of priority habitats

### **Key Sustainability Issues**

**1.21** The following sustainability issues were first identified in the Scoping Report and were the basis for the criteria in the Sustainability Appraisal Framework:

- The Borough has a growing, but ageing population.
- Population projections predict an increase of some 16,000 people between 2008 and 2033. Migration accounts for a significant proportion of this population change.
- The Borough has a shortage of affordable housing. House prices have increased by 143% since 2001.
- With regards to housing mix, East Staffordshire has a higher proportion of detached properties than the national and regional average.
- In East Staffordshire the number of households is expected to increase by 11,778 (26%) between 2008 and 2033. The largest increase is expected to be in one person households.
- Deprivation in the Borough is concentrated in Burton on Trent. Since 2007 there has been a significant increase in the number of neighbourhoods that fall within the most deprived 10% from two to four.
- Economic activity in the Borough is increasing.
- The Borough has a varied economic base, which has undergone a substantial period of change, driven by industrial re-structuring, globalisation, reforms to agricultural policy and development of the growth of the service led economy.
- Despite the steady decline of the manufacturing industry over the last decade, the sector still is a dominant employer in the Borough.
- Demand for sport facilities
- Poor physical and mental health in many communities in Burton Upon Trent
- Flood risk is a key consideration in the allocation of land for development especially with the current concerns over climate change. A large part of the Burton area is within Flood Zone 2 and 3, which will have to be taken into account.

## **State of the environment without a plan in place**

**1.22** The baseline review indicated that the following trends may be likely to continue if the Local Plan was not implemented:

- Lack of housing choice – not being able to provide the right mix of housing for the Borough’s growing population
- Increasing shortage of affordable housing both in actual numbers and in the range of types available, linked to continuing high house prices
- Increased use of energy i.e. the domestic consumption of gas and electricity
- Growth in economic activity – continued growth in businesses but not necessarily in the right sector, providing the right jobs for local people
- Loss of employment land for new business development
- Continued low skills base level in the Borough
- More incidence of deprivation in Burton – particularly around health deprivation.
- Continued issues and problems with flooding in the Borough.
- Greater contribution towards climate change
- School provision would not meet needs of Borough
- Deterioration in air quality

## **What is the added value of having the Local Plan in place?**

- Ensuring a coordinated approach to development – no piecemeal development
- Ensuring new development is of high quality meeting most up to date sustainability standards
- Clear standards for housing mix, open space, national forest planting
- Development will take place alongside essential infrastructure delivery which is known early in development process
- Coordinated response to drainage and flooding encouraging partnership working and opportunities for the creation of multifunctional spaces
- Opportunities for green infrastructure are maximised
- Assisting Neighbourhood Plans by setting the strategic policy framework
- Enables detailed guidance in Supplementary Planning Guidance to hang off policy



## What options have been considered?

**1.23** During the preparation of the Local Plan, a variety of options has been considered and tested using the SA framework. The rationale for selecting options came from the availability of sites for development and possible constraints to their delivery. The results of the options appraisal are presented in the SA Report and have informed the development of the Preferred Strategic Option and the development of policies for inclusion in the Local Plan. The sustainability of the different options was considered in choosing which options to take forward.

**1.24** The following five Spatial Options have been considered by the Council and tested through the SA process to determine if they should form the Council's preferred spatial option.

**Table 1.2: Spatial Options**

Option 1	Urban extensions	Development in just Burton and Uttoxeter, no village development
Option 2	Urban extensions plus villages	Development in Burton and Uttoxeter plus two or more strategic villages
Option 3	Equal distribution	Development distributed equally across villages and towns
Option 4	Single urban focus	All development to be in just Burton upon Trent or Uttoxeter
Option 5	New Settlement	Create a brand new settlement in the rural areas

**1.25** The SA identified Option 2 as the most sustainable option. Option 2 provides a more balanced approach to growth, addressing some rural needs whilst placing the majority of growth in the main urban centres providing opportunities to enhance the role and quality of the two main towns. This relates positively to economic objectives in the rural and urban areas. Some negative effects are associated with this option in relation to greenfield development and the potential impact on the countryside, landscape and biodiversity. It is acknowledged that all Options would have these impacts. It is also important to acknowledge that mitigation would be required to meet the demands of some sustainability measures.

**1.26** Having identified Option 2 as the most sustainable option a further four strategic options were considered which looked in more detail at how growth would be distributed around Burton upon Trent, Uttoxeter and the villages.



**Table 1.3: Strategic Options**

Options	Description
2a	Concentrating growth to the West and North in Burton and some growth to the West of Uttoxeter and the strategic villages
2b	Concentrating most growth in the Outwoods and Stretton areas of Burton and some development to the South of Uttoxeter and the strategic villages
2c	More dispersed growth surrounding Burton and some development to the South of Uttoxeter and the strategic villages
2d	Concentrating growth in the South of Burton and some development to the West of Uttoxeter and in strategic villages.

**1.27** The SA identifies Strategic Option 2d as the most sustainable Strategic Option, although Option 2c also scored well. Option 2d represents the most sustainable Strategic Option by providing larger sustainable mixed-use urban extensions in both Burton and Uttoxeter, which as well as providing a broad range of housing type and mix, would also provide additional services and facilities for the towns, and more employment land. In addition, this option proposes more development on brownfield sites in the towns which would increase the vitality and viability of the town centres. Development is also directed to the re-use of brownfield sites in the urban areas. Some negative effects are associated with this option in relation to greenfield development and the potential impact on the countryside, landscape and biodiversity. It is acknowledged that all Options would have these impacts, however the delivery of a growth strategy based upon the development of sustainable urban extensions is thought to mitigate the impacts the most. It is also important to acknowledge that mitigation would be required to meet the demands of some sustainability measures. Option 2d forms the basis of the Council's Preferred Strategic Option

**1.28** Having decided on the broad distribution of development the Council appraised strategic development sites, those capable of delivering over 100 residential units, to determine which sites were the most sustainable, and could therefore form part of the Preferred Strategic Option delivery strategy. A threshold of 100 was decided because this would allow for strategic sites in both urban and rural areas.


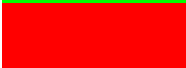


## East Staffordshire Local Plan – Pre Submission

**1.29** The Local Plan Pre-Submission document is intended to set out and support East Staffordshire Borough Council's spatial vision and strategic objectives through:

- A spatial strategy setting out the Council's Strategy for growth;
- Strategic policies;
- Detailed policies;
- A monitoring and implementation framework (indicators and targets for assessing the Local Plans performance); and
- Providing sufficient evidence to support the strategy and policies. A list of the evidence can be found in **Appendix J**

**1.30** A diagram illustrating the spatial strategy and strategic sites at Burton and Uttoxeter is set out below:

Key

	Greenfield housing or employment allocation
	Brownfield housing allocation
	Greenfield mixed use allocation
	Borough Boundary

**Figure 1.1 Burton upon Trent, Barton under Needwood, Tutbury and Rolleston Strategic Site Allocations**

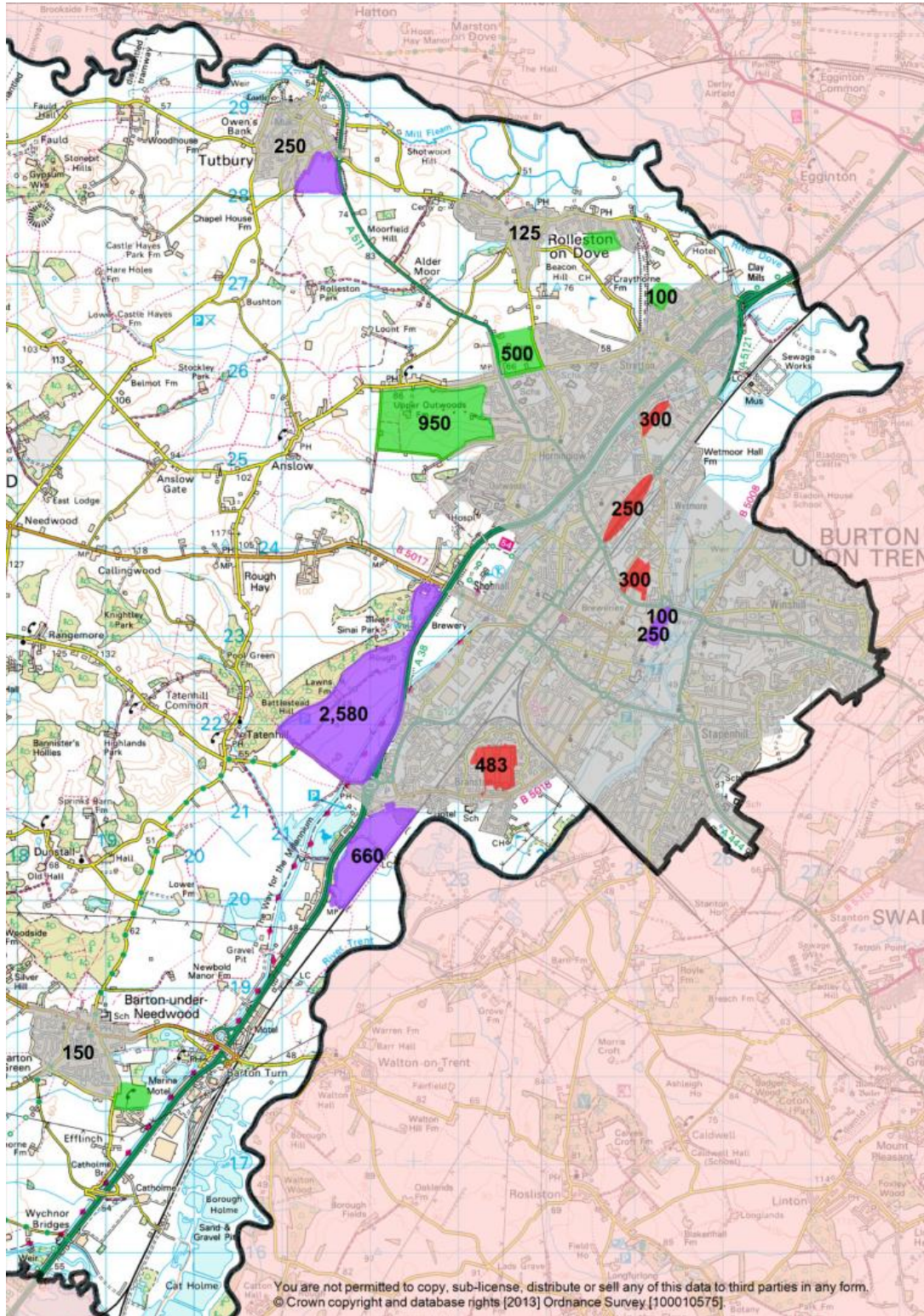
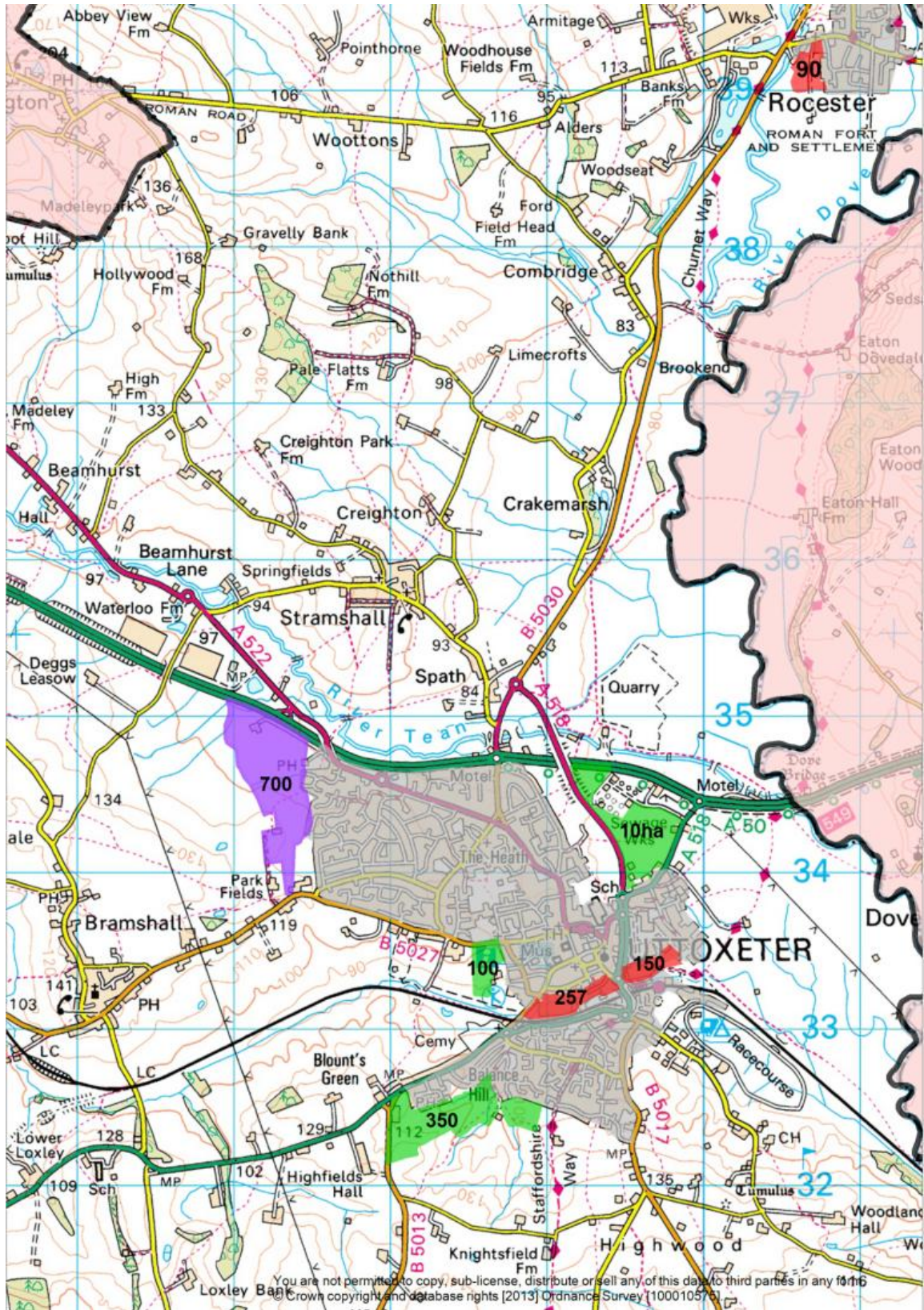




Figure 1.2 Uttoxeter and Rocester Strategic Site Allocations



**1.31** The Pre-submission document includes the following policies:

### **Strategic Policies**

Principle 1: Presumption in favour of sustainable development

1. East Staffordshire approach to sustainable development
2. A strong network of settlements
3. Provision of Homes and Jobs
4. Distribution of Housing Growth
5. Distribution of Employment growth
6. Managing the Release of Housing and Employment land
7. Sustainable urban extensions
8. Development outside development boundaries
9. Infrastructure Delivery and Implementation
10. Education Bargates/Molson Coors site
11. Derby Road Regeneration Area
12. Burton and Uttoxeter Employment Policy
13. Rural Economy
14. Tourism, culture and leisure development
15. Meeting Housing Needs
16. Affordable housing
17. Housing Development on Exception sites
18. Gypsy, travellers and travelling Show people pitches
19. Town and Local Centres
20. Managing Town and Local Centres
21. Supporting Local Communities
22. High quality design
23. Green Infrastructure
24. Historic Environment
25. National forest
26. Climate change, water management and flooding
27. Renewable and low carbon energy generation
28. Biodiversity and geodiversity
29. Locally significant landscape and views
30. Green Belt and Strategic Green Gaps
31. Open Space and outdoor sports
32. Indoor sports
33. Health and Wellbeing
34. Accessibility and sustainable transport

### **Detailed Policies**

1. Design of new development
2. Designing in sustainable construction
3. Design of new residential development, extensions and curtilage buildings
4. Replacement dwellings in the countryside

5. Protecting the historic environment – All heritage Assets, Listed Buildings and Conservation Areas
6. Protecting the historic environment – Other Heritage Assets
7. Pollution
8. Tree Protection
9. Advertisements
10. Water recreation and blue infrastructure
11. European Sites
12. St Georges

**1.32** The Pre-Submission Local Plan is based on the Preferred Option consultation document. The overall strategy has remained the same but has been amended to include strategic sites that now have planning permission, to increase housing sites due to an increase in the housing requirement and amendments to policy wording as a result of the consultation responses. There are additional policies dealing specifically with health, infrastructure, delivery, water based recreation and the historic environment.

### **Evaluation of Effects – Pre Submission**

**1.33** Having tested the Local Plan objectives for compatibility against the SA framework, the strategy, strategic sites, and planning policies were assessed in order to conclude the effects of the policies of the Local Plan.

**1.34** Policies were assessed individually and also in combination with each other.

**1.35** The main likely significant effects of the Local Plan overall and responding to the key sustainability issues identified in the Borough, which are outlined in the Scoping Report and Appendix B of the SA Report, 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)

**1.36** 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.

**1.37** 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.

**1.38** 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.

**1.39** 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.

## **Uncertainties**

**1.40** 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 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**

**1.41** 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.

## **The Difference made by this Appraisal**

**1.42** The SA has contributed to plan development by providing an independent assessment of the sustainability of:



Stage		Difference made by Sustainability Process
Scoping Report 2007		Set out baseline data, key sustainability issues and the methodology which would be used to assess the new Local Plan
Revised Scoping Report 2012		Updated the baseline data, key sustainability issues and methodology which would be used to assess the new Local Plan
Interim SA 2012		This document appraised the various strategy options, individual sites and draft policies. The SA made recommendations on how objectives and policies could be improved and highlighted which strategy option would be the most sustainable.

## How has the Assessment Improved the Policies?

**1.43** Policy development and appraisal has been an iterative process. The SA assessment has highlighted to the Council where there are individual or groups of policies that do not pick up the issues expressed in the SA objectives.

**1.44** It was also apparent that in appraising policies certain outcomes were assumed and not explicit in the policy text. As a consequence amendments have been made which would result in a more sustainable policy appraisal. Policy delivery and implementation was assumed rather explicit and the SA process has tested this.

**1.45** The process has therefore provided an initial check on the sustainability of the Local Plan Pre-Submission as envisaged by government guidance. The assessment identifies likely effects, which will require further investigation in response to planning applications (i.e. on a site-by-site basis) and regular monitoring of likely significant effects

**1.46** An additional benefit of the process is that lessons learned during the SA of the Local Plan Pre-Submission can inform the SA of other planning documents such as Supplementary Planning Documents and Neighbourhood Plans.

**1.47** The ultimate effectiveness of the Local Plan from the point of view of sustainable development will depend on an effective partnership between East Staffordshire Borough Council, prospective developers, stakeholders and infrastructure delivery partners and the community at large.

## Recommended Monitoring

**1.48** A monitoring framework is set out in Chapter 8 of the SA Report. Monitoring indicators will be reported in East Staffordshire Borough Council's 'Local Authority Monitoring Report'. It is important that monitoring takes place in order to check there is no deterioration of the environment.

Table 1.4: Glossary

<b>Biodiversity</b>	The variety of life on earth embracing all species, communities, habitats and ecosystems associated with the terrestrial, aquatic and marine environments. Usually the term refers to the variety of species within a specified area.
<b>Brownfield land</b>	Previously developed land, including garden land (for a more detailed definition see annex 2 of the National Planning Policy Framework).
<b>Conservation Area</b>	An area of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance, designated under section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990.
<b>Countryside</b>	Anywhere in East Staffordshire Borough Council outside a settlement boundary (a line that defines the urban area of a settlement both urban and rural locations).
<b>Cumulative effects</b>	The state in which a series of repeated actions have an effect greater than the sum of their individual effects, for instance, where several developments each have insignificant effects but together have a significant effect.
<b>Density</b>	The intensity of development within a given area, usually measured for housing in terms of the number of dwellings per hectare.
<b>Development Plan</b>	A development plan sets out the policies and proposals for the development, conservation and use of land and buildings in a particular Local Planning authority area. The development plan is the most important consideration for Local Planning authorities when they decide on a planning application.
<b>Environmental Appraisal</b>	A procedure and management technique which ensures that the likely effects of a new development on the environment are fully appraised and taken into account before the determination of development proposals.
<b>Evidence Base</b>	The information gathered by a planning authority to support the preparation of development documents. It includes quantitative (numerical values) and qualitative (feelings and opinions) data
<b>Flood plain</b>	All land adjacent to a watercourse over which water flows in times of flood or would flow but for the presence of flood defences where they exist. The limits of the flood plain are defined by the peak level of a 1 in 100 year return period flood or the highest known water level, whichever is greater.
<b>Geodiversity</b>	Geodiversity is the variety of rocks, minerals, fossils, soils, landforms and natural processes.
<b>Green Infrastructure</b>	Green infrastructure is strategically planned and managed networks of natural lands, working landscapes and other open spaces that conserve ecosystem values and functions and provide associated benefits to human populations.

<b>Greenfield land</b>	A general term to describe all sites that have not previously been developed.
<b>Habitats Regulations Assessment</b>	A Habitats Regulations Assessment is the assessment of the impacts of implementing a plan or policy on international protected sites for nature conservation. These sites are Special Protection Areas (SPAs) for birds identified under the Birds Directive and Special Areas of Conservation (SACs) for habitats and species under the Habitats Directive. Ramsar sites (wetlands of international importance designated under the Ramsar Convention) are also considered under the assessment, as are candidate SACs and proposed SPAs.
<b>Highway</b>	Road and/or footway (usually adopted by the County Council for the purpose of maintenance).
<b>Infrastructure</b>	The network of communications and utility services such as roads, drains, electricity, water, gas and telecommunication, required to enable the development of land. The term is also used in relation to community or social services such as schools, shops, libraries and public transport.
<b>Listed Building</b>	A building of special architectural or historic interest. The planning (Listed Buildings and Conservation Areas) Act 1990 gives the Department of Culture, Media and Sport on advice from English Heritage, powers to list buildings of special architectural and historic interest. Listed buildings are graded according to their importance (Grades I, II* and II).
<b>Local Distinctiveness</b>	That which sets a locality apart from anywhere else.
<b>Local Plan</b>	A portfolio or folder of documents setting out the planning strategy for a Local Planning authority area.
<b>Masterplan</b>	Comprehensive plans for an area of renewal or development, where particular attention must be paid to site specific variables, in consultation with the local community.
<b>Monitoring</b>	The regular and systematic collection and analysis of information to measure policy implementation. Planning authorities are required by law to produce a Local Authorities Monitoring Report covering the monitoring of policies in the Local Plan that they are responsible for preparing.
<b>Nature Conservation</b>	Conservation of natural features, including geographical and geomorphological features, flora and fauna.
<b>Planning Permission</b>	Needed before carrying out most types of development. To obtain planning permission it is necessary to make a planning application to the local planning authority.
<b>Regional Spatial Strategy</b>	Regional Spatial Strategies (or Regional Strategies) were introduced by the Planning and Compulsory Purchase Act 2004, and set out planning policies for each of the English regions outside of London. The Localism Act 2011

	introduced powers that allowed the Secretary of State to abolish Regional Spatial Strategies. The West Midlands Regional Spatial Strategy was formally revoked in May 2013.
<b>Renewable Energy</b>	The term renewable energy covers those resources that occur and reoccur naturally in the environment. Sources include solar, wind, biomass and wave/ hydroelectric power.
<b>SA</b>	Sustainability Appraisal.
<b>SEA</b>	Strategic Environmental Assessment.
<b>Secondary Effects</b>	Effects that are not direct but occur away from the original effect or as a result of a complex pathway. An example of secondary effects is a development that changes a water table and thus affects the ecology of a nearby wetland.
<b>Site of Special Scientific Interest</b>	A site of special scientific interest is identified by English Nature under section 28 of the Wildlife & Countryside Act 1981 as requiring protection from damaging development on account of its flora, fauna, geological and/or physiological features.
<b>Strategic Sites</b>	Sites with a threshold of 100 or more units.
<b>Statutory</b>	A requirement by law.
<b>Sustainability Appraisal</b>	A systematic review of the Borough Council's Local Plan policies, in order to evaluate their impacts on achieving sustainable development. The appraisal is an integral part of the plan making and review process, which allows for the valuation of alternatives and is based on a quantifiable baseline of environmental, social and economic aspects of achieving sustainable development.
<b>Sustainable Development</b>	The Bruntland Report provides the accepted definition of sustainable development as 'Development that meets the needs of the present without compromising the ability of future generations to meet their own needs' (WCED, 1987). The principle of sustainable development may be broadly described as encompassing social, environmental and economic issues, and also entailing concern with intra-generational and inter-generational themes.
<b>Synergistic Effects</b>	The effects interact to produce a total effect greater than the sum of the individual effects, so that the nature of the final impact is different to the nature of the individual impacts. An example is the combination of SO <sub>x</sub> and NO <sub>x</sub> to produce smog.
<b>Town Centre</b>	A town or traditional suburban centre, which provides a broad range of facilities and services, and which fulfils a function as a focus for both the community and for public transport.

<b>Vitality and Viability</b>	The term relates to the economic health of town centres.
<b>Watercourse</b>	Includes all rivers, streams, ditches, drains, cuts, dykes, sewers (excluding public sewers) and passages through which water flows.
<b>Wildlife Corridor</b>	Areas of natural/semi-natural habitat protected from development in order to maintain the movement of wildlife through the urban area.

# Chapter 2

## Background and Introduction to the Sustainability Appraisal

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### Introduction

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

**2.2** 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>2</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).

**2.3** 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.

**2.4** 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.

**2.5** 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>3</sup>. This document is the Sustainability Appraisal Report for the East Staffordshire Local Plan Pre-Submission Report.

**2.6** 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.

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<sup>2</sup> Section 15 of the Planning and Compulsory Purchase Act 2004, as amended by Section 111 of the Localism Act 2011

<sup>3</sup> European Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the SEA Directive)

**2.7** This SA Report identifies and appraises the likely significant effects of the strategy, sites and policy proposals contained within the emerging Local Plan. It also appraises the extent to which implementation of the plan will achieve the social, environment and economic objectives of sustainable development.

### **Summary of the Local Plan**

**2.8** The Local Plan will set out the long term strategy for growth across the Borough for the period 2012 – 2031 and provide strategic policies and proposals supplemented by a suite of policies that seek to manage change at the local level.

**2.9** Over the plan period the Local Plan will make provision for development to meet the needs of the Borough by ensuring that there is suitable residential and employment land available for growth, along with opportunities for retail and leisure development, supported by appropriate infrastructure.

**2.10** The Local Plan will provide a mechanism for supporting the delivery of the East Staffordshire Borough Council Sustainable Community Strategy and help to meet spatial objectives set out by the Local Strategic Partnership.

**2.11** The Plan includes the following spatial strategy and strategic sites:



Figure 2.1: Burton Upon Trent, Rolleston, Barton Under Needwood and Tutbury Strategic Allocations

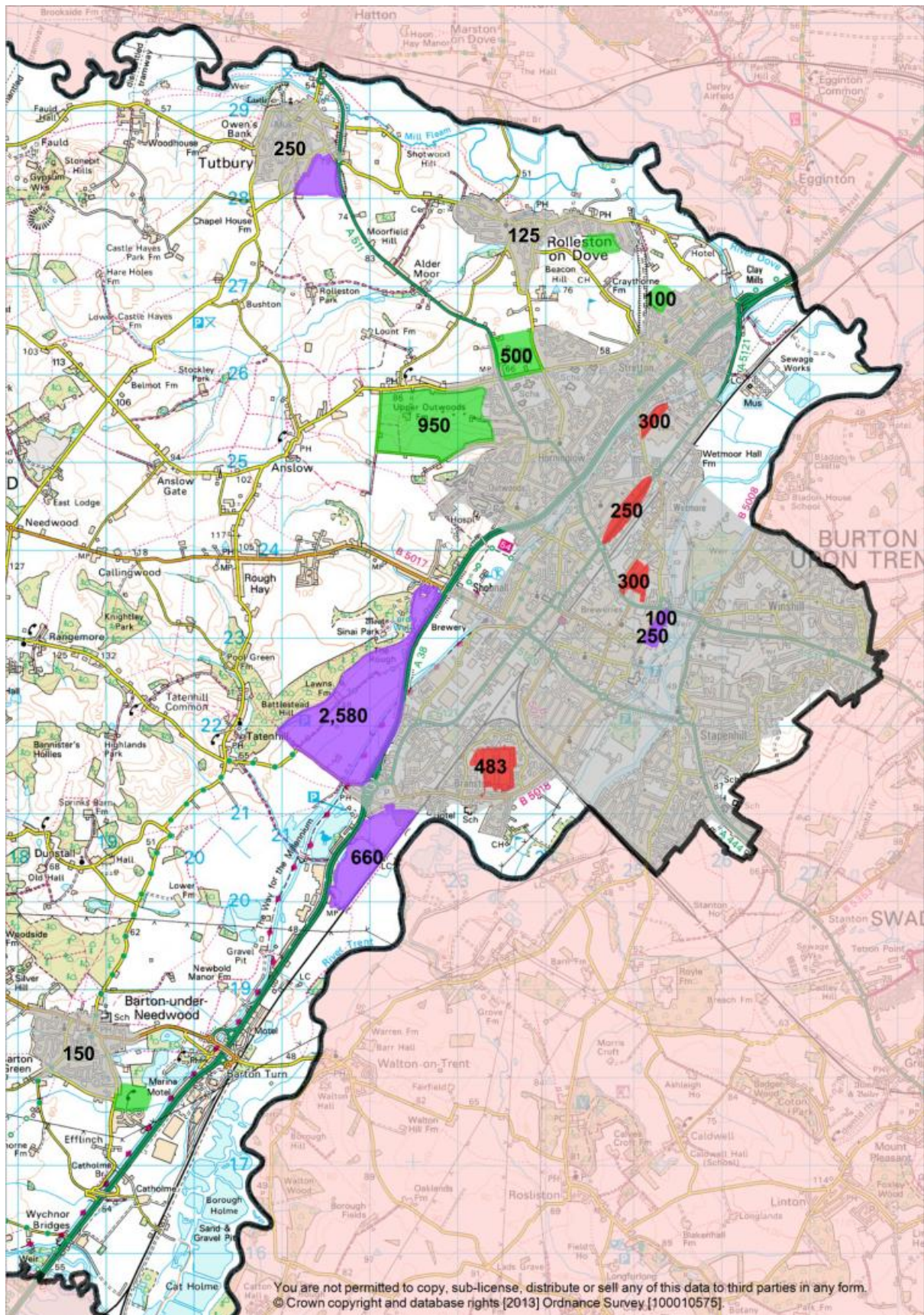
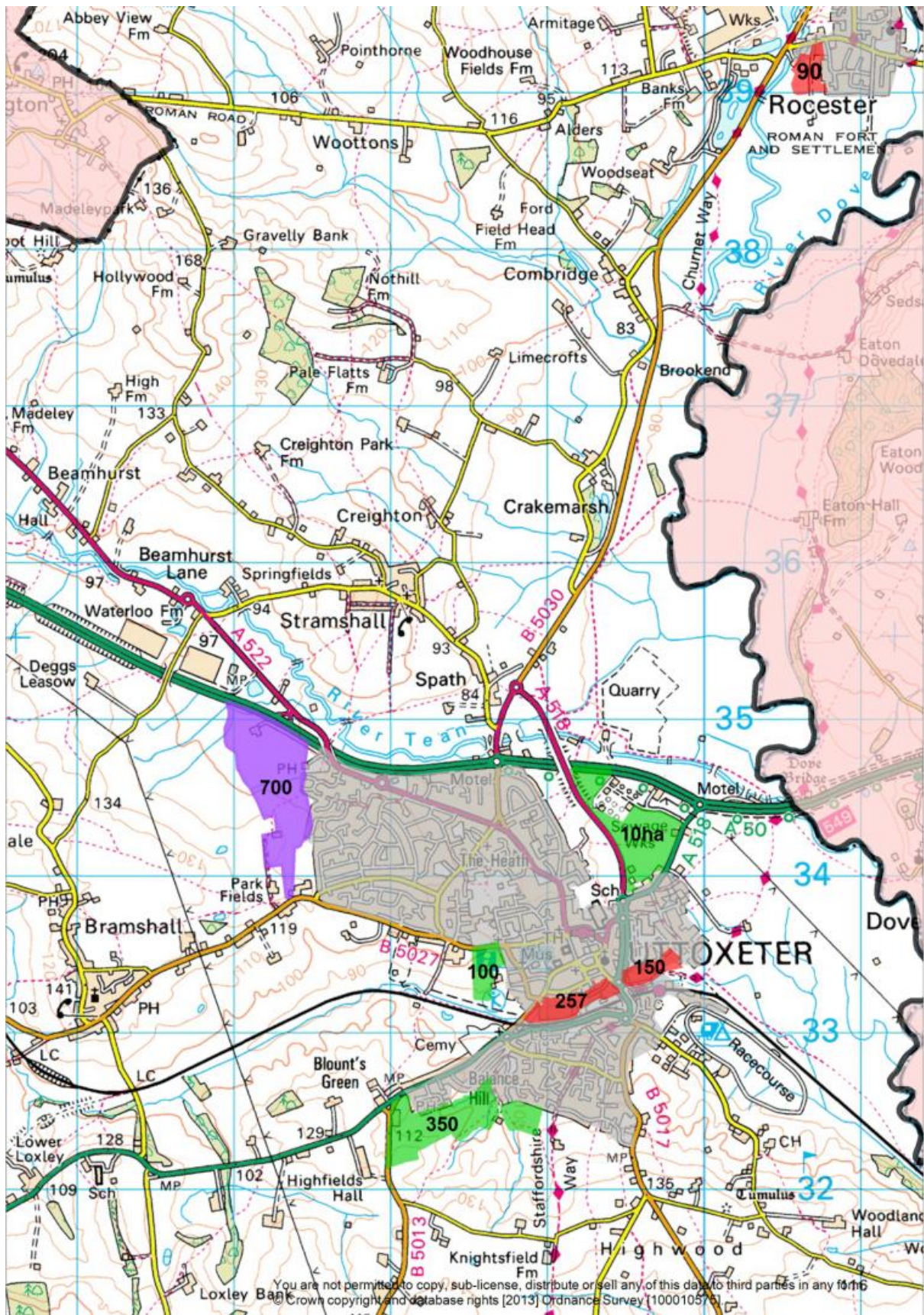




Figure 2.2 Uttoxeter and Rocester Strategic Site Allocations



The Local Plan Pre-Submission includes the following policies:

### **Strategic Policies**

Principle 1: Presumption in favour of sustainable development

1. East Staffordshire approach to sustainable development
2. A strong network of settlements
3. Provision of Homes and Jobs
4. Distribution of Housing Growth
5. Distribution of Employment growth
6. Managing the Release of Housing and Employment land
7. Sustainable urban extensions
8. Development outside development boundaries
9. Infrastructure Delivery and Implementation
10. Education Bargates/Molson Coors site
11. Derby Road Regeneration Area
12. Burton and Uttoxeter Employment Policy
13. Rural Economy
14. Tourism, culture and leisure development
15. Meeting Housing Needs
16. Affordable housing
17. Housing Development on Exception sites
18. Gypsy, travellers and travelling Show people pitches
19. Town and Local Centres
20. Managing Town and Local Centres
21. Supporting Local Communities
22. High quality design
23. Green Infrastructure
24. Historic Environment
25. National forest
26. Climate change, water management and flooding
27. Renewable and low carbon energy generation
28. Biodiversity and geodiversity
29. Locally significant landscape and views
30. Green Belt and Strategic Green Gaps
31. Open Space and outdoor sports
32. Indoor sports
33. Health and wellbeing
34. Accessibility and sustainable transport

### **Detailed Policies**

1. Design of new development
2. Designing in sustainable construction
3. Design of new residential development, extensions and curtilage buildings
4. Replacement dwellings in the countryside
5. Protecting the historic environment – All heritage Assets, Listed Buildings and Conservation Areas
6. Protecting the historic environment – Other Heritage Assets

7. Pollution
8. Tree Protection
9. Advertisements
10. Water recreation and blue infrastructure
11. European Sites
12. St Georges

## Sustainability Appraisal

**2.19** 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).*

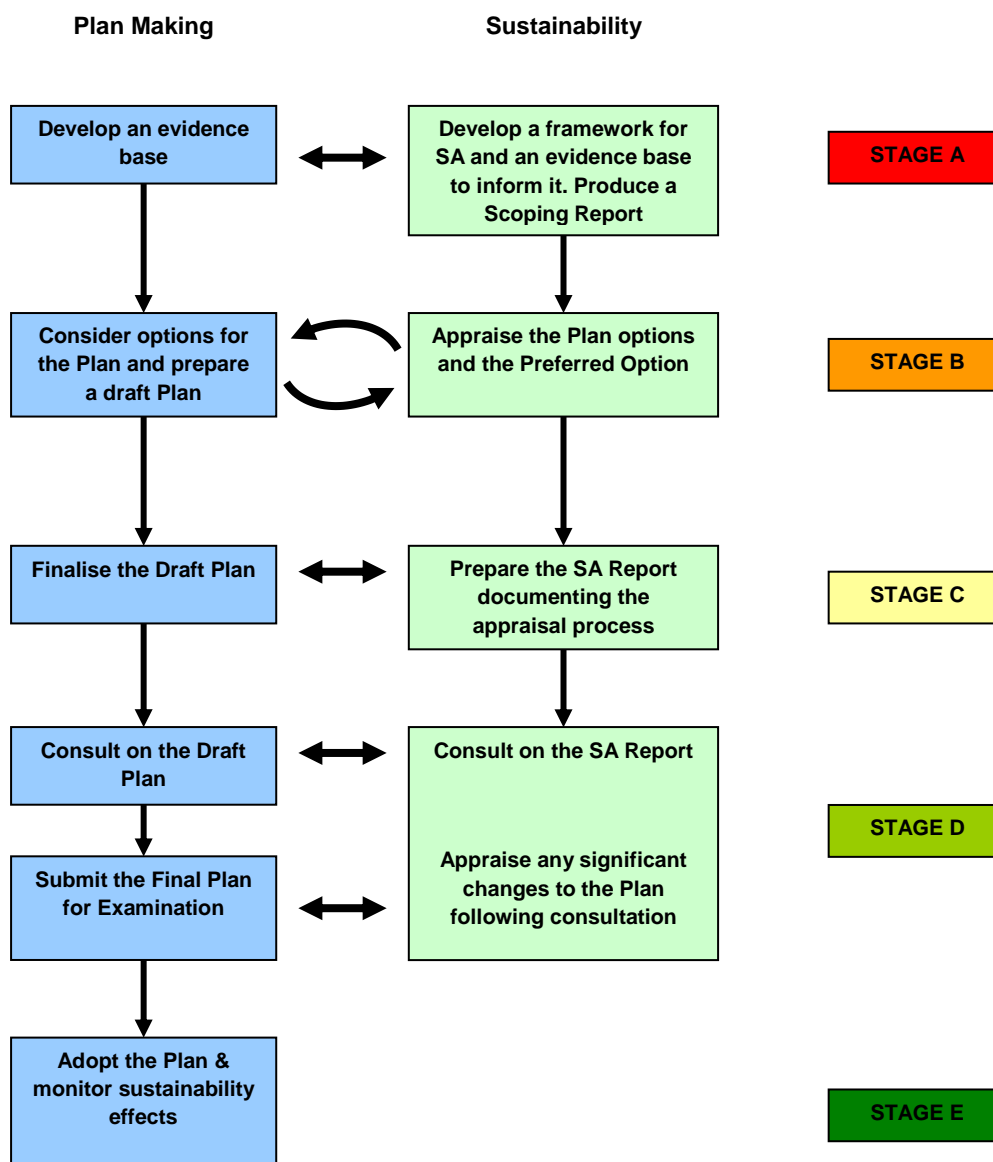
**2.20** Paragraph 165 of the National Planning Policy Framework requires the preparation of a Sustainability Appraisal which meets the requirements of the European Directive on Strategic Environmental Assessment and be an integral part of the plan preparation process considering all the likely significant 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.

**2.21** 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.

**2.22** The relationship between the plan-making process and Sustainability Appraisal is illustrated Figure 2.1 below.



Figure 2.3: Process Diagram



## Sustainability Appraisal Scoping

**2.23** The first stage of the SA of the emerging Local Plan was a Scoping Report. This stage involves setting the context of the SA, establishing the baseline position, identifying sustainability issues across the Borough and developing Sustainability Objectives. Two Scoping Reports have been prepared by the Council; the most recent reflecting up to date information was consulted upon in February 2012 for a 5 week period ending 21<sup>st</sup> March 2012. The full document can be found on the Council's website at <http://eaststaffsbc-consult.limehouse.co.uk/portal>. This SA Report should be read in conjunction with the Scoping Report, however for clarity some of the information is reproduced in the appendices of this Report.

## Habitats Regulations Assessment

**2.24** The Habitats Regulations<sup>4</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’.*

**2.25** Habitats Regulations Assessments (HRA) require a different methodology to sustainability appraisal but the two work in tandem. A separate HRA has been prepared and is available on the Council’s website. An updated HRA reported will be published alongside this SA Report.

## Structure of this Report

**2.26** This report is structured in the following way:

<b>Chapter 1: Non-technical Summary</b>	This chapter summarises the sustainability appraisal and the key findings of the report
<b>Chapter 2: Introduction</b>	This section introduces the Sustainability Appraisal – what it is and why it is required
<b>Chapter 3: Methodology</b>	Sets out the methodology to be used at each stage of the SA process
<b>Chapter 4: Context setting</b>	Sets out the sustainability issues for the Borough
<b>Chapter 5: Refining options, predicting and evaluating effects of the Spatial Options and Strategic Options</b>	This section sets out which strategy and site options have been appraised and how this has resulted in the final strategy
<b>Chapter 6: Predicting and evaluating the significance of the effects of the Local Plan</b>	This chapter sets out the conclusion of sustainability appraisal of the strategy, site allocations and policies from the Pre-Submission Local Plan
<b>Chapter 7: Cumulative effects assessment</b>	This chapter looks at the cumulative effect of implementing the Local Plan as a whole document

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<sup>4</sup> The Conservation of Species and Habitats Regulations 2010

## Chapter 8: Proposed Monitoring

It is important that monitoring takes place when the Local Plan is adopted to ensure that there will be no significant environmental effects. This chapter sets out how the Local Plan will be monitored and also sets out the actions that will be considered should there be negative effects identified in the future

## Chapter 9: Conclusions and Next Steps

This chapter sets out clearly the positive and negative effects which are predicted from implementing the Local Plan. Information on the next steps for the Sustainability Appraisal, Local Plan and how to make comments is also set out.

The Sustainability Appraisal Report Appendices includes the following:

<b>Appendix A</b>	Sustainability Appraisal Framework
<b>Appendix B</b>	Baseline Data
<b>Appendix C</b>	Key Sustainability Issues
<b>Appendix D</b>	Appraisal of Local Plan Objectives
<b>Appendix E</b>	Appraisal of Strategy Options
<b>Appendix F</b>	Appraisal of Strategy Options 2a-2d
<b>Appendix G</b>	Strategic Sites Appraisal
<b>Appendix H</b>	Appraisal of Pre-Submission Local Plan Policies
<b>Appendix I</b>	Strategic Flood Risk Assessment and Water Framework Directive
<b>Appendix J</b>	List of Evidence Base
<b>Appendix K</b>	Comments on Scoping Report 2007
<b>Appendix L</b>	Comments on Scoping Report 2012
<b>Appendix M</b>	Comments on Interim SA Report 2012

## SEA Regulations Requirements Checklist

2.27 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 2.2: Environmental Report Requirements**

<b>Environmental Report Requirements</b>	<b>Section(s) of this report</b>
<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
12-(3) The report shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents 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 6
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 2 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 2 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,	Chapters 6 and 7

landscape and the interrelationship between these factors.	
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 7
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 5 and 6
A description of measures envisaged concerning monitoring in accordance with Article 10.	Chapter 8
A non-technical summary of the information provided under the above headings.	Chapter 1



# Chapter 3

## Sustainability Appraisal Methodology

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**3.1** This Section provides an overview of the approach and methodology underpinning the sustainability appraisal. The conclusions of each stage can be found in chapter 5.

### Approach

**3.2** An SA is required for Development Plan Documents (DPDs) under the regulations implementing the provisions of the Planning and Compulsory Purchase Act 2004. The Regulations stipulate that SAs of DPDs should meet the requirements of the EU Directive 2001/42/EC on assessment of effects of certain programmes on the environment. As such the approach taken to the SA process and format informed by this report is heavily informed by the:

- EU Directive 2001/42/EC
- Environmental Assessment of Plans and Programmes Regulations 2004
- Practical Guide to the Strategic Environmental Assessment Directive (Sept 2005)
- Plan Making Manual (Provided by the Planning Advisory Service)

**3.3** It is important to note that whilst the SA is required to meet the requirements of Strategic Environmental Assessment (SEA), there is an important difference between the SA and SEA methodologies. SEA is primarily focused on environmental effects, and the methodology addresses a number of topic areas namely biodiversity, population, human health, flora and fauna, soil, water, air, climatic factors, material assets, cultural heritage and landscape and the interrelationship between these topics. On the other hand, SA widens the scope of the appraisal to include the social and economic topics as well as environmental impacts.

**3.4** 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 and described here.

**3.5** SA Guidance broadly sets out a five staged approach to the SA, which has been followed with more tailored and specific tasks to ensure a suitable appraisal of the Pre-Submission Local Plan. This section sets out the methodology in line with the

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

five stages and makes reference to the relevant legislative framework, to demonstrate compliance and best practice.

**3.6** The five stages are:

<b>STAGE</b>	<b>DESCRIPTION</b>
<b>Stage A</b>	<b>Setting the context and objectives, establishing the baseline and deciding on the scope</b>
<b>Stage B</b>	<b>Developing and refining options and assessing potential effects</b>
<b>Stage C</b>	<b>Preparing the Interim Sustainability Appraisal Report</b>
<b>Stage D</b>	<b>Consulting on the Draft Local Plan and the Interim Sustainability Appraisal Report</b>
<b>Stage E</b>	<b>Monitoring the significant effects of implementing the East Staffordshire Local Plan on the environment and sustainability objectives.</b>

### **Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope**

**Tasks:**

- A1.** Identifying other relevant plans, programmes and environmental protection objectives
- A2.** Collecting baseline information
- A3.** Identifying environmental problems
- A4.** Developing Sustainability Appraisal objectives and framework
- A5.** Consulting on the scope of the Sustainability Appraisal

**3.7** Stage A as set out above was completed at the Scoping stage and has been undertaken twice by the Council. The first time was the preparation, consultation and publication of the East Staffordshire Sustainability Appraisal Scoping Report 2007. The Scoping Report set out the following:

- Other plans, programmes and sustainability objectives relevant to the Local Plan;
- Baseline information, either collected or still needed, with notes on sources and any problems encountered;
- Key sustainability issues;

- The SA Framework including SA objectives and indicators. The SA framework is defined on the basis of the analyses in tasks 1, 2 and 3 above and can be found in Appendix A;
- Methodologies for predicting and assessing to what extent the proposed plan meets the stated sustainability objectives; and
- Proposals for the structure and level of detail of the Sustainability Appraisal Report.

**3.8** It was necessary to refresh the Scoping Report in 2012 due to the time elapsed between 2007 and 2012, to take into account plans, programmes, strategies and initiatives published and updated since 2007 as well as those identified by stakeholders during consultation on the draft Scoping Report. It was also felt that additional/up-to-date baseline information need to be included to take into account comments on the baseline received during consultation on the draft Scoping Report and the emerging Local Plan evidence base.

**3.9** The Scoping Report was refreshed and consulted upon in February 2012 and the feedback of this consultation has been taken into account in taking the SA and Local Plan forward to this stage.

**3.10** The baseline information, set out in the Scoping Report has been drawn upon to inform the appraisal of the Pre-Submission Local Plan. In addition, an overview of this baseline is contained in chapter 4 and in Appendix B.

## **Stage B: Developing and refining options and assessing potential effects**

**3.11** Stage B was completed at the Interim SA Report stage which was consulted alongside the Local Plan Preferred Options in October 2012. The Interim SA Report set out the following:

### **Tasks:**

**B1.** Testing the plan objectives and vision against the sustainability framework objectives to identify potential synergies or inconsistencies and help in improving the Local Plan objectives

**B2.** Develop and refining the Spatial Options

**B3.** Testing and predicting the potential effects of the Local Plan Strategic Options,

**B4.** Evaluating the potential significance of effects of the Local Plan Preferred Strategic Options, Strategic sites and policies for delivery

**B5.** Mitigating adverse effects, to ensure that potential adverse effects are identified and potential mitigation measures are considered

**B6.** Proposing measures to monitor the environmental effects of the plan by detailing the means by which the environmental performance of the plan or programme can be assessed.

## Task B1: Testing the Plan Objectives and Vision

**3.12** The draft Local Plan Strategic Objectives and vision were tested against the Sustainability Appraisal Objectives as set out in the Framework to identify both potential synergies and inconsistencies. The Interim SA helped to refine the draft Local Plan Objectives to form those included in the Pre-Submission Local Plan. Each of the 13 Local Plan objectives was assessed against each sustainability objective and scored against the following criteria.

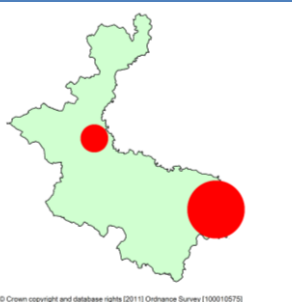
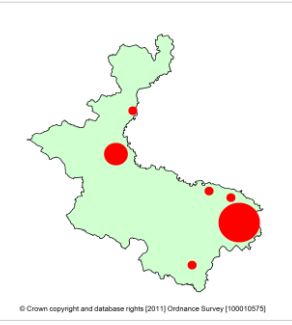
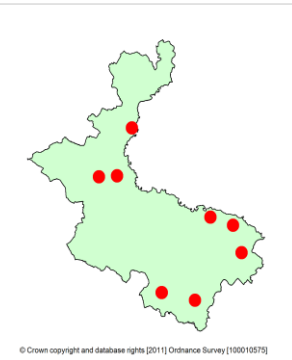
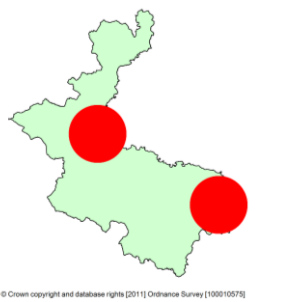
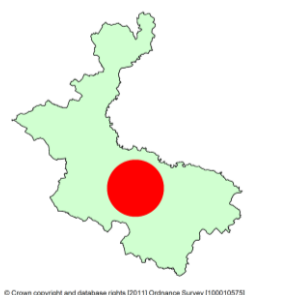
Symbol	Description
✓	<b>Broadly Compatible</b> – pursuing the Local Plan objective is likely to help achieve the sustainability objective
*	<b>Potential Conflict</b> – pursuing the Local Plan objective may work against or prevent the sustainability objective being achieved
~	<b>No clear link</b> – the Local Plan objective is unlikely to have any direct influence on this sustainability objective
?	<b>Depends on Implementation</b> – by pursuing the Local Plan objective there may be mixed implications for the sustainability objective, depending on how it is pursued

**3.13** This appraisal resulted in recommended amendments to the 13 Local Plan objectives and to the Vision. The amended Objectives and Vision were then documented and re-appraised against the SA Framework. The outcome of the appraisal is summarised in Chapter 5 and further detail is provided in Appendix C and D.

## Tasks B2 and B3: An overview of the Spatial Options, Strategic Options and Strategic Sites

**3.14** A requirement of the SA is to assess a reasonable number of alternative options identified in the preparation of the Local Plan. The preparation of the Local Plan has included consideration of a number of alternatives, referred to as “Spatial Options”, as published in the previous Draft Pre Publication Strategic Options Plan. Figure 3.1 sets out the alternative Spatial Options:

Figure 3.1: The Spatial Options

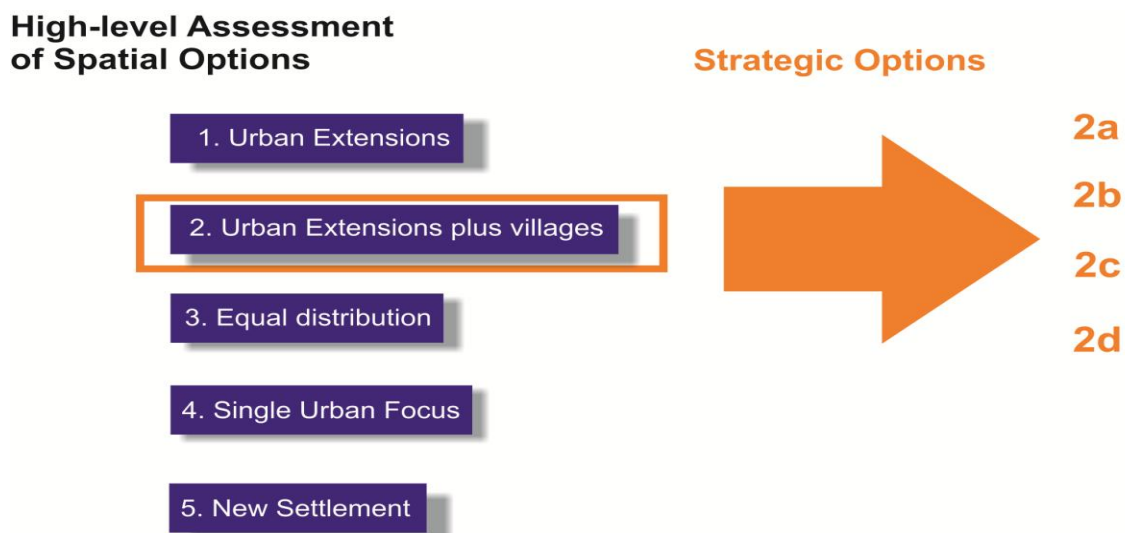
<b>Option 1</b>	Urban extensions	Development in Burton and Uttoxeter, no village development	 <p>A map of the region showing development in Burton and Uttoxeter. Two red circles of different sizes are placed on the map, representing development in these two locations. The rest of the region is light green.</p> <p><small>© Crown copyright and database rights [2011] Ordnance Survey [100010575]</small></p>
<b>Option 2</b>	Urban extensions plus villages	Development in Burton and Uttoxeter plus two or more strategic villages	 <p>A map of the region showing development in Burton and Uttoxeter, plus two or more strategic villages. Three red circles of different sizes are placed on the map, representing development in these locations. The rest of the region is light green.</p> <p><small>© Crown copyright and database rights [2011] Ordnance Survey [100010575]</small></p>
<b>Option 3</b>	Equal distribution	Development distributed equally across villages and towns	 <p>A map of the region showing development distributed across multiple locations. Several red circles of different sizes are placed on the map, representing development in various locations. The rest of the region is light green.</p> <p><small>© Crown copyright and database rights [2011] Ordnance Survey [100010575]</small></p>
<b>Option 4</b>	Single urban focus	All development to be in just Uttoxeter or Burton	 <p>A map of the region showing development in either Burton or Uttoxeter. Two red circles of different sizes are placed on the map, representing development in these two locations. The rest of the region is light green.</p> <p><small>© Crown copyright and database rights [2011] Ordnance Survey [100010575]</small></p>
<b>Option 5</b>	New Settlement	Create a brand new settlement on green field land in a more rural location	 <p>A map of the region showing a new settlement in a rural location. A single red circle is placed on the map, representing development in a rural location. The rest of the region is light green.</p> <p><small>© Crown copyright and database rights [2011] Ordnance Survey [100010575]</small></p>

**3.15** Each Spatial Option was tested against the Sustainability Appraisal Framework, as documented in Chapter 5 and detailed in Appendix E. Each option was scored individually against each sustainability objective and given a score in accordance with the framework criteria set out below:

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 or 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

**3.16** The SA of the five Spatial Options aided the identification of a Preferred Spatial Option to deliver the preferred approach of “urban extensions plus villages” (Option 2). This further refinement led to the development of four Strategic Options which required testing through the SA against the same criteria as above. Figure 3.2 demonstrates the way in which the five Spatial Options were refined to form the assessment of four more detailed Strategic Options.

**Figure 3.2: Refinement of options**



**3.16** The detailed assessment of the Strategic Options (Figures 3.30-3.6) is included in Appendix E and F.



## The Strategic Options

Figure 3.3: 2a Concentrating growth on two sites in Burton and some growth in Uttoxeter and strategic villages

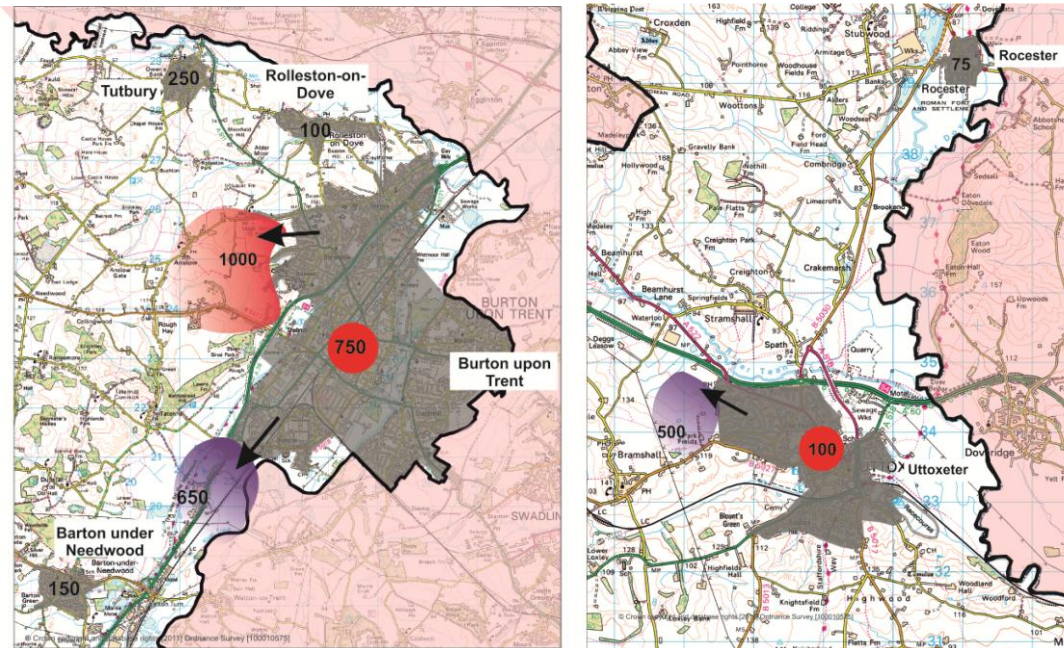


Figure 3.4: 2b concentrating most growth in the Outwoods and Stretton areas of Burton and some development in Uttoxeter and the strategic villages

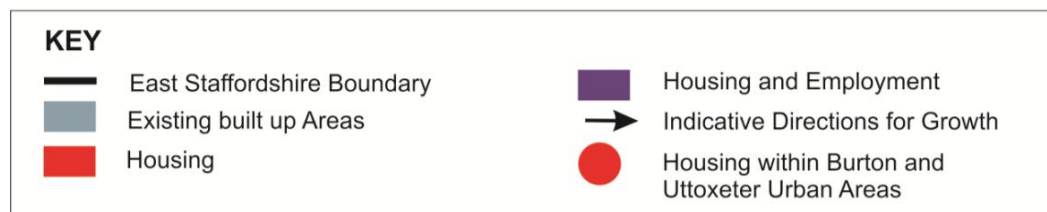
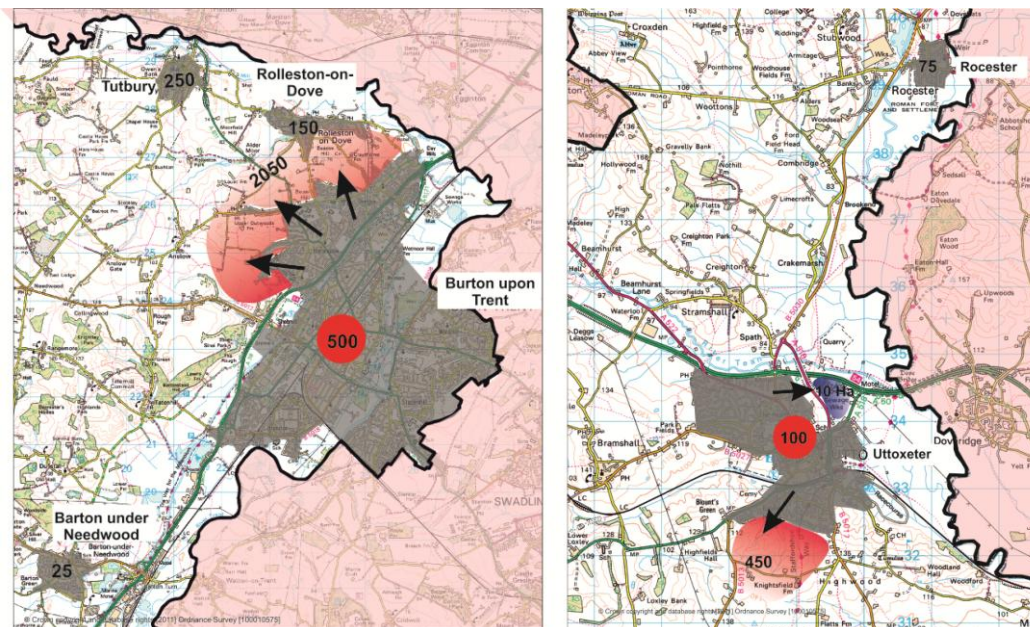




Figure 3.5: 2c more dispersed growth surrounding Burton and some development in Uttoxeter and the strategic villages

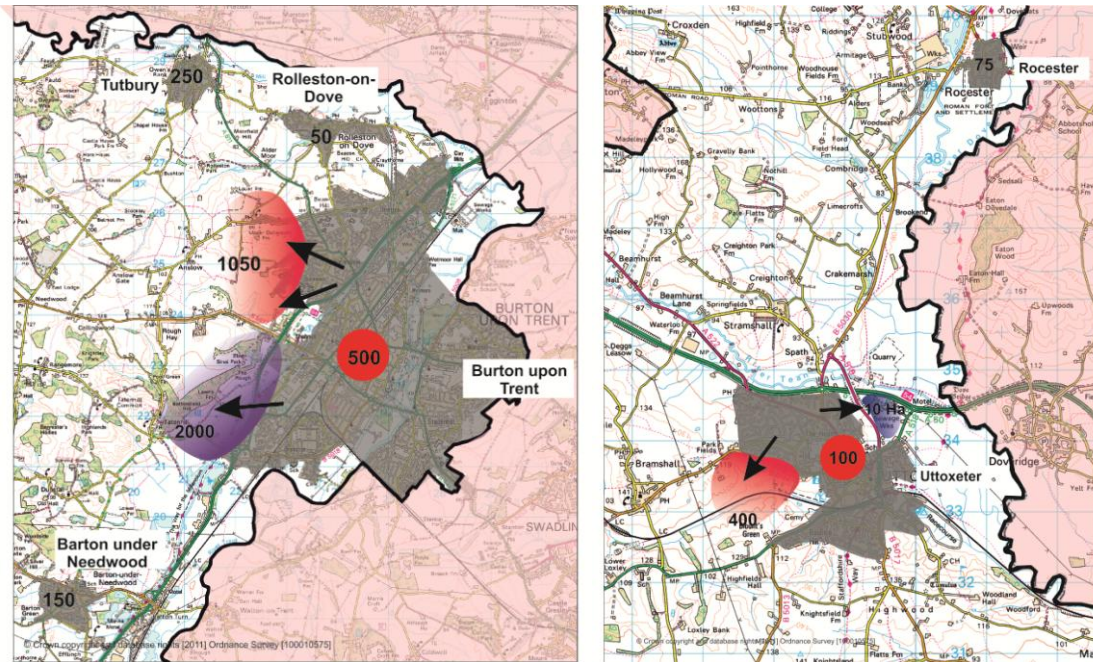
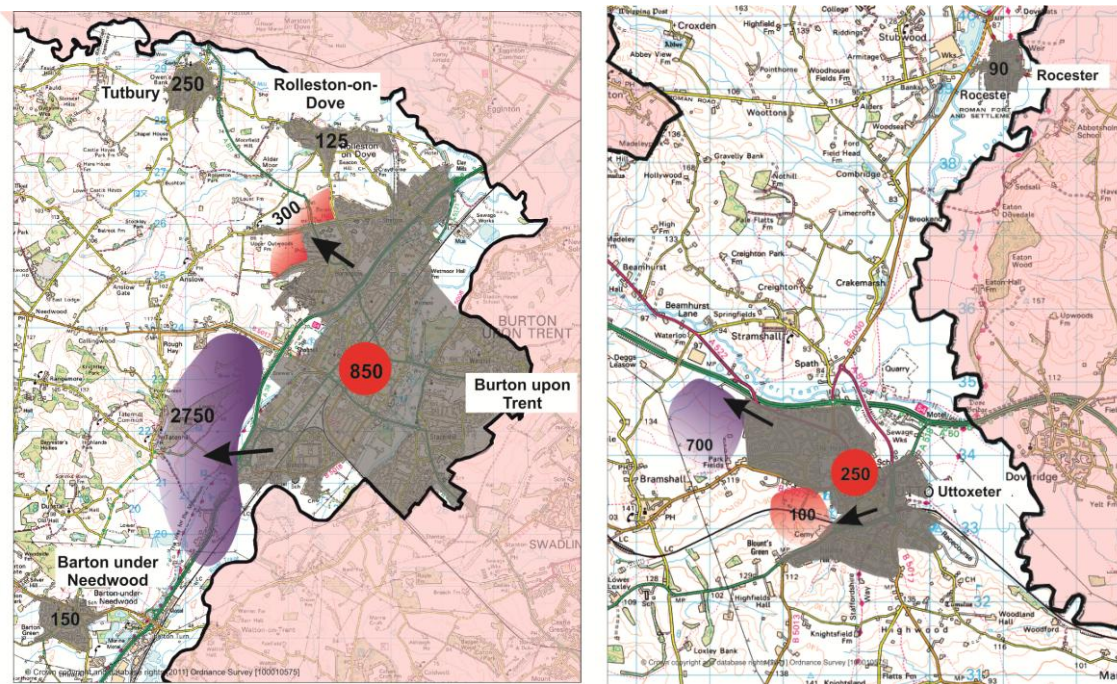








Figure 3.6: 2d concentrating growth in the South of Burton and some development in Uttoxeter and the strategic villages



KEY	
	East Staffordshire Boundary
	Existing built up Areas
	Housing
	Housing and Employment
	Indicative Directions for Growth
	Housing within Burton and Uttoxeter Urban Areas



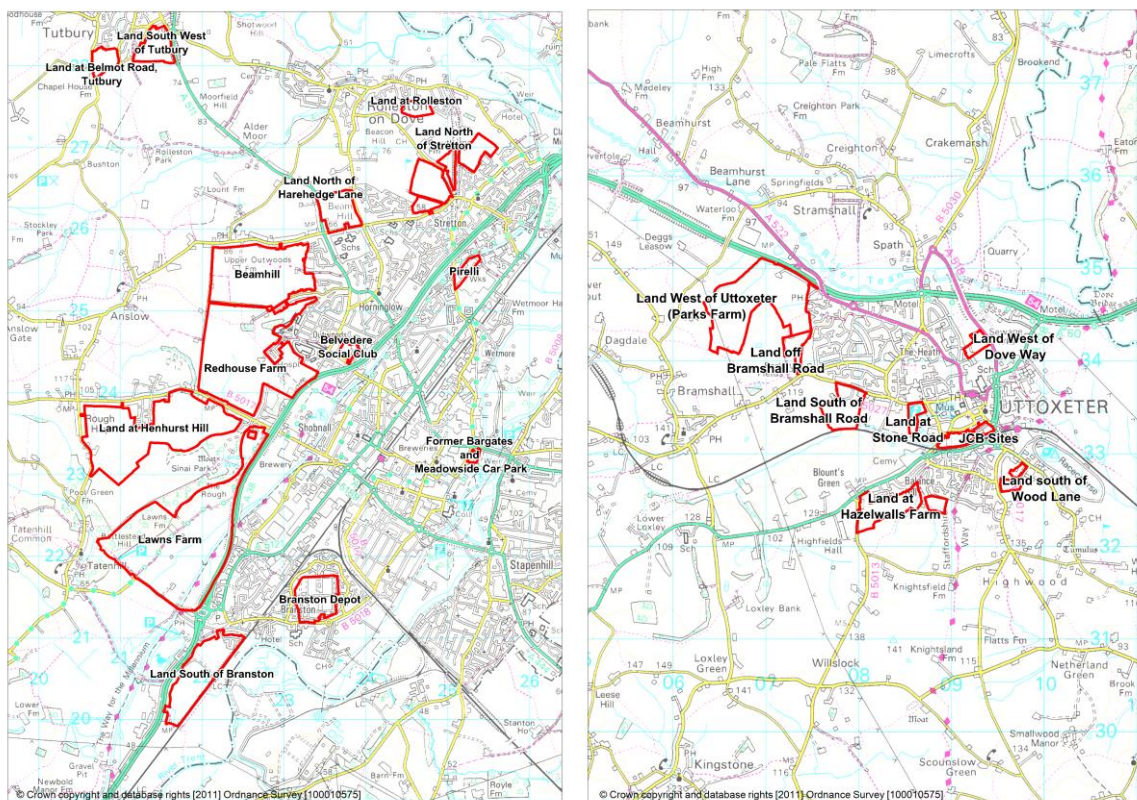
## The Strategic Sites

**3.17** A threshold of 100 units was established for residential development. It was felt that this threshold would capture sites that were greenfield and brownfield in both urban and rural locations. Figure 3.7 sets out the geographic location of the sites that met the threshold and were therefore appraised through the SA.

**3.18** The Councils 2012 Strategic Housing Land Availability Assessment was the starting point for determining the scope of the strategic sites assessment. In order to identify strategic sites, a screening exercise was undertaken to discount those sites that are fundamentally unsuitable for development (i.e. they do not constitute 'reasonable alternatives'). The screening process used the following criteria to discount unsuitable sites:

- **Availability** – only those sites that we know are available as identified in the SHLAA
- **Developable** sites as identified in the SHLAA – Suitable location for development, reasonable prospect that it will be available, could be developed at a point in time.
- **Location** – Located within (or adjacent to) Burton, Uttoxeter or a Strategic Village
- **Site Size** – Minimum potential yield of 100 units as identified in the SHLAA

**Figure 3.7: Geographic Location of Strategic Sites**



**3.19** The numbers in the tables against each site is the Strategic Housing Land Availability Assessment reference number unique to each site.

### Burton

21 Branston Depot (Brownfield)	40 Land Nth of Harehedge Lane	125 Land at Henhurst Hill
89 Pirelli, Beech Lane (Brownfield)	44 Land West of the A38 (Lawns Farm)	178 Land North of Stretton
113 Belvedere Social Club, (Brownfield)	68 Land South of Beamhill Road	186 Land South of Main Street Branston
Bargates, High Street (Brownfield)	107 Land North of Forest Road, South of Field Land and East of Outwoods Lane	346 Land at Bitham Lane, Stretton

**Table 3.1: Burton Strategic Sites**

### Uttoxeter

32 JCB Sites	53 Land at Hazelwalls Farm, (off B5013)	179 Land West of Dove Way
42 Land West of Uttoxeter (Parks Fm)	95 Land South of Bramshall Road, inc Ryecroft Farm	334 Land at Stone Road
48 Land off Bramshall Road	97 Land south of Wood Lane	Dove Way, Employment allocation

**Table 3.2: Uttoxeter Strategic Sites**

### Strategic Villages

47 Land at Belmont Road, Tutbury	58 Land South West of Tutbury	51 Land to the North West of Barton under Needwood
59 Land at Efflinch Lane, Barton under Needwood	344 Barton Park Farm, Barton under Needwood	66 Sports Field, Rolleston

**Table 3.3: Strategic Villages - Strategic Sites**

**3.20** In the case of the individual Strategic Sites, a more detailed assessment could be undertaken to enable likely environmental effects to be predicted. The techniques used to undertake this assessment process included:

- Professional judgement – the approach adopted for the SA was iterative and involved a high degree of interaction between those individuals responsible for the SA and those responsible for the development of the Local Plan.
- Geographical Information Systems – providing information on archaeological sites, ecological designations, flood zones and agricultural land classifications.
- Project specific information – consultation activities, masterplanning documents and information supporting planning applications.
- Survey information – field notes from the Strategic Housing Land Availability Assessment.

- Secondary research – baseline data as set out in the Scoping Report and other technical evidence work.<sup>6</sup>
- The full results of the Strategic Sites appraisal process are set out in Appendix G and a summary is provided in Chapter 5.

**3.21** The SA objectives were used as a framework for assessing the sites. However, several of the objectives were not suitable for using to assess sites, or would not help to differentiate between sites, therefore were not used. The sites assessment was based on the following criteria:

**Table 3.4: Sites Sustainability Appraisal Framework**

	<b>Topic</b>	<b>Criteria</b>
1	<b>Housing</b> To provide a suitable mix of decent housing available and affordable to everyone.	- <b>Size of site:</b> the larger the site the more opportunities available to deliver different housing choices.
2	<b>Economic Opportunities</b> To provide access to economic opportunities for local residents	- Provision of employment on site - Access to existing employment sites
3	<b>Transportation</b> To reduce the need to travel, encourage more sustainable modes of transport and make best use of existing transport infrastructure	- Location of site - Proximity to key routes - Connectivity to town centre
4	<b>Flood risk</b> To reduce and manage the risk of flooding which would be detrimental to the public well-being, the economy and the environment	- Flood zone location (2 and 3 score negatively)
5	<b>Use of land</b> To deliver more sustainable use of land in more sustainable locations, utilising brownfield land.	- Brownfield (positive) - Greenfield (negative)
6	<b>Countryside and Landscape quality</b> To protect, maintain and enhance the character and appearance of the landscape and townscape quality, maintaining and strengthening local distinctiveness and sense of place.	- Landscape character - Location
7	<b>Biodiversity and Geodiversity</b> To promote biodiversity and geodiversity through protection, enhancement and management of species and habitats	- Identification of BAP species on site - Biodiversity Opportunities on site
8	<b>Historic Environment and Heritage Assets</b> To protect and enhance designated and undesignated heritage assets and their settings. To protect and enhance historic buildings, archaeological sites and cultural features of importance to the community. And to protect and maintain all vulnerable assets (including built and historic).	- HER records on site - Historic Environment characterisation assessment and associated sensitivity
9	<b>Accessibility to services</b> To provide access to services and facilities	- Location and size - Distance to existing services and facilities

<sup>6</sup> Green Infrastructure Study, Strategic Flood Risk Assessment, PPG 17 Open Space and Playing Pitch Assessment, Water Cycle Study

		<ul style="list-style-type: none"> <li>- Provision on site</li> <li>- Settlement hierarchy</li> </ul>
10	<b>Local Distinctiveness</b> Creating a sense of place, incorporating high quality design and quality of life, contributing to existing settlement character	<ul style="list-style-type: none"> <li>- Site specific judgement</li> <li>- Location</li> <li>- Size</li> </ul>
11	<b>Existing Settlements</b> To sustain the vitality and viability of existing settlements	<ul style="list-style-type: none"> <li>- Site specific judgement</li> <li>- Size</li> <li>- Provision of other community benefits</li> <li>- Settlement hierarchy</li> </ul>

**3.22** The following table sets out the scoring framework for the sites assessment.

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 or 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

**3.23** Information has been used such as masterplan documents, planning application documentation and consultation activities. Therefore, some of this information forms assumptions to the prediction of effects and evaluation of significance. Each site was appraised in light of its potential yield (housing capacity) and redline boundary as defined in the SHLAA.

#### **Task B4. The approach to evaluating the significance of the effects of Spatial Options, Strategic Options, Strategic Sites and Policies for delivery**

**3.24** The significance of the effects of the Options, sites and policies is based on the evaluation and allocation of scores which includes a consideration of the potential characteristics of the effects and the area likely to be affected, having regard in particular to<sup>7</sup>:

- (a) The probability, duration, frequency and reversibility of the effects;
- (b) The cumulative nature of the effects;

<sup>7</sup> As set out in Regulation 2 Schedule 1 of The Environmental Assessment of Plans and Programmes Regulations 2004



- (c) The transboundary nature of the effects;
- (d) The risks to human health or the environment;
- (e) The magnitude and spatial extent of the effects (geographical area/size of population likely to be effected)
- (f) The value and vulnerability of the area likely to be affected due to
  - a. Special natural characteristics or cultural heritage
  - b. Exceeded environmental quality standards; or
  - c. Intensive land use; and
- (g) The effects on areas or landscapes which have a recognised national, community or international protection status

**3.25** Scores were allocated to each Option and Site in relation to each Sustainability Objective. This was informed by both quantitative and qualitative data, depending on the availability of information. The score allocated included an assumption of potential mitigation<sup>8</sup>, as documented in the assessment process. The scores included a judgement on whether or not a predicted effect would be environmentally significant.

**3.26** The prediction of effects and evaluation of significance (scoring) was an iterative process, enabling a consideration of different combinations of Spatial and Strategic Options and Strategic Sites taking into account the SA findings.

### SA of Preferred Option Local Plan Policies

**3.27** 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.

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

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 or 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

<sup>8</sup> Regulation 7 of Schedule 2 of The Environmental Assessment of Plans and Programmes Regulations 2004 requires the following “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.

--	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

### **Task B5. Mitigating adverse effects, to ensure that potential adverse effects are identified and potential mitigation measures are considered.**

**3.29** Annex 1 of the Directive requires the SA to include measures to prevent, reduce or offset any significant adverse effects on the environment of implementing the Local Plan, which are referred to in this report as ‘mitigation measures.’ The need for mitigation measures to improve a potential negative effect or increase the benefit of potential positive effects were set out against each strategic site assessment as shown. The mitigation suggested included a range of measures such as:

- Changes to the option concerned;
- Recommendations for Local Plan policy relating to key issues identified;
- Technical measures to be applied during the implementation stage and application of design principles; and
- Identifying issues to be addressed in project specific environmental assessments.

**3.30** Mitigation measures were suggested in the Interim SA Report and are also provided in the appraisal of the Pre-Submission Local Plan in the SA Report.

### **Task B6. Proposing measures to monitor the environmental effects of the plan by detailing the means by which the environmental performance of the plan or programme can be assessed.**

**3.31** It is required that the SA Report outlines arrangements to be set up for monitoring the significant effects of implementing the adopted Local Plan. Monitoring is intended to provide important feedback on the success of the plan and progress towards its objectives. Indicators and targets are proposed to help monitor the sustainability effects of the Local Plan. Targets and/or indicators for each sustainability objective were identified in the Interim SA Report and have been amended in this SA Report.

**3.32** Government requires Local Planning authorities to produce Local Authority Monitoring Reports, and the Plan Making Guide advises this is used to monitor likely significant effects identified in sustainability monitoring. Accordingly, the monitoring strategy for the SA will be integrated into the Local Authority Monitoring Report.

Proposals for monitoring the Local Plan will take into account the proposals for SA monitoring.

## Stage C Preparing the Interim Sustainability Appraisal Report

### Tasks:

C1: To present the predicted environmental and sustainability effects of the Local Plan Preferred Option, including other options considered, in a form suitable for public consultation and use by decision makers.

**3.33** The Interim SA Report was produced and included the sustainability appraisal of the following: Vision and Objectives; Spatial Options; Strategic Options; Strategic Sites and Pre-Submission Policies.

## Stage D: Consulting on the Preferred Option Local Plan and the Interim Sustainability Appraisal Report

### Tasks:

D1: Consulting the public and consultation bodies on the Preferred Option Local Plan and the Interim Sustainability Appraisal Report to provide an opportunity to express opinions on the findings of the sustainability appraisal and to use it as a reference point in commenting on the Local Plan Preferred Option. To gather more information through the opinions and concerns of the public.

D2: Assessing significant changes to ensure that the environmental and sustainability implications of any changes in the progression of the Local Plan at this stage are taken into account.

D3: Making decisions and providing information on the consideration of consultation responses. To provide information on how the sustainability appraisal and consultees opinions are taken into account in deciding on the Submission version of the Local Plan.

**3.34** The Interim Sustainability Appraisal Report was consulted on during October – December 2012. A schedule of the comments and explanation of how these have been considered can be found in Appendix M.

## Sustainability Appraisal Report

**3.35** This section includes the appraisal of the Pre-Submission Local Plan. Following consultation on the Preferred Options and associated Interim SA Report there is a need to repeat several stages of the Sustainability Appraisal process. This is due to alterations to the Vision and Objectives, Spatial Strategy, Strategic Sites and Policies. In addition there have been a number of alternative strategies and site options put forward through the consultation responses and so it is necessary to ensure these have been appraised as reasonable alternatives. This SA Report therefore includes the following tasks:

### Tasks:

**B1.** Testing the plan objectives and vision against the sustainability framework objectives to identify potential synergies or inconsistencies and help in improving the Local Plan objectives

**B3.** Testing and predicting the potential effects of all reasonable alternatives

**B4.** Evaluating the potential significance of effects of the Pre-Submission Local Plan Spatial Strategy, Strategic sites and policies for delivery

**B5.** Mitigating adverse effects, to ensure that potential adverse effects are identified and potential mitigation measures are considered

**B6.** Proposing measures to monitor the environmental effects of the plan by detailing the means by which the environmental performance of the plan or programme can be assessed.

## Stage E: Monitoring the significant effects of implementing the East Staffordshire Local Plan on the environment and sustainability objectives.

**3.36** This stage will be carried out once the Local Plan is adopted.

### Tasks:

E1: Developing aims and methods for monitoring to track the environmental and sustainability outcomes of the Local Plan and to show whether they are as predicted; to help identify adverse effects.

E2: Responding to adverse effects by preparing appropriate responses where adverse effects are identified.

# Chapter 4

## Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope

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**4.1** This Section provides an overview of the sustainability and environmental characteristics of the Borough, the wider context in respect of other relevant plans and programmes and the Sustainability Framework that forms the basis of the Sustainability Appraisal process.

### **Task A1: Identifying other relevant plans, programmes and environment protection objectives**

**4.2** As required by the SEA Directive<sup>9</sup>, the SA provides a review of the relationship between the Local Plan and:

*“the environmental protection objectives, established at international, [European] Community or [national] level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation” (Annex I (e)).*

**4.3** Analysing the objectives of relevant plans and programmes helped to identify ways in which the Local Plan could align with these aspirations. The relationships with other relevant documents also highlighted potential synergies, inconsistencies and constraints which require addressing. The analysis of these plans provided the context on which the Sustainability Objectives set out in the Sustainability Framework were formed and used in the appraisal of the each stage of the appraisal process.

**4.4** A comprehensive review of relevant plans and programmes was undertaken as part of the Local Plan Sustainability Appraisal Scoping Report, updated in February 2012. The review considered the inter-plan effects of the East Staffordshire Sustainability Framework Objectives and the objectives of each plan other plan and programme identified. Table 4.1 sets out the international, national, regional and Local Plans and programmes reviewed, with a detailed assessment provided in the scoping report. Since the list was originally drawn up in 2007 there have been a number of new strategies, aswell as the deletion of others. This list has been amended and represents the most up to date relevant strategies for the SA process.

---

<sup>9</sup> European Directive 2001/42/EC Annex I (a)

**Table 4.1: Plans and programmes Reviewed**

<b>International</b>
<ul style="list-style-type: none"> <li>• Bathing Water Quality Directive (Council Directive 76/160/EEC)</li> <li>• Drinking Water Directive (98/83/EC)</li> <li>• EU Air Quality Directive (2008/50/EC) and previous directives (96/62/EC; 99/30/EC; 2000/69/EC &amp; 2002/3/EC)</li> <li>• EU Biodiversity Strategy (1998)</li> <li>• EU Directive 2002/91/EC (2002) Directive 2002/91/EC on the Energy Performance of Buildings</li> <li>• EU Directive on the Conservation of Natural Habitats and of Wild Fauna and Flora (92/43/EEC) &amp; Subsequent Amendments</li> <li>• EU Directive on the Conservation of Wild Birds (79/409/EEC)</li> <li>• EU Directive on the landfill of waste (99/31/EC)</li> <li>• EU Directive on Waste (Directive 75/442/EEC, 2006/12/EC 2008/98/EC as amended)</li> <li>• EU Nitrates Directive (91/676/EEC)</li> <li>• EU Packaging and Packaging Waste Directive (94/62/EC)</li> <li>• EU Water Framework Directive (2000/60/EC)</li> <li>• European Directive 2001/42/EC on the Assessment of the Effects of Certain Plans and</li> <li>• European Landscape Convention 2000 (became binding March 2007)</li> <li>• European Spatial Development Perspective</li> <li>• Programmes on the Environment (SEA Directive)</li> <li>• Renewed EU Sustainable Development Strategy (2006)</li> <li>• The UNESCO Convention concerning the Protection of the World Cultural and Natural Heritage (1972)</li> <li>• UN Convention of Biological Diversity (1992)</li> <li>• UNFCCC (1997) The Kyoto Protocol to the UNFCCC</li> <li>• World Commission on Environment and Development (1987) Our Common Future (The Brundtland Report)</li> </ul>
<b>National</b>
<ul style="list-style-type: none"> <li>• "Working with the grain of nature – a Biodiversity Strategy for England" (Defra, 2002)</li> <li>• DCLG (2006) Code for Sustainable Homes - A step-change in sustainable home building practice</li> <li>• DCMS (2002) Game plan: A strategy for delivering government's sport and physical activity objectives</li> <li>• DCMS (2007) Heritage Protection for the 21st Century - White Paper</li> <li>• Defra (2007) Air Quality Strategy for England, Scotland, Wales and Northern Ireland</li> <li>• Energy and Climate Change, July 2009)</li> <li>• Energy White Paper - Meeting the Energy Challenge (2007)</li> <li>• Environment Agency (2009) 'Water for people and the environment' - Water Resources Strategy for England and Wales</li> <li>• Government/Department for Transport - 10 Year Transport Plan 2000 (2000)</li> <li>• HM Government (2003) Sustainable Energy</li> <li>• HM Government (2004) Housing Act</li> <li>• National Planning Policy Framework (2012)</li> <li>• Natural Environment and Rural Communities Act (2006)</li> <li>• Play Strategy for England (DCMS, 2008)</li> <li>• Rural Strategy (Defra, 2004)</li> <li>• Securing the Future – the UK Sustainable Development Strategy (2005)</li> <li>• Strategy for England's Trees, Woods and Forests (ETWFs) (DEFRA 2007)</li> <li>• Sustainable Communities Plan: Building for the Future (2003)</li> <li>• The Climate Change Act 2008</li> <li>• The Historic Environment: A Force for our Future (DCMS, 2001)</li> <li>• The Planning Act 2008</li> <li>• The UK Low Carbon Transition Plan: National Strategy for Climate and Energy (Department for</li> </ul>



- The UK Renewable Energy Strategy (HM Government, 2009)
- Water White Paper – ‘Water for Life’ (2011)

### **Regional**

- A Regional Sustainable Development Framework, 2005
- Derbyshire Dales Council Local Plan
- East Staffs Flexicare suitability Map 2012
- Humber River Basin Management Plan
- Lichfield District Council Local Plan
- National Forest Strategy
- Regional Biodiversity Strategy for the West Midlands. West Midlands Biodiversity Partnership, 2005
- Shaping the Future of Staffordshire 2006–2021: The Sustainable Strategy for the County
- South Derbyshire District Local Plan
- Stafford Borough Council Local Plan
- Staffordshire and Stoke on Trent Structure Plan 1996-2011
- Staffordshire Climate Change Declaration
- Staffordshire County Council Climate Change Strategy
- Staffordshire County Council Rural Declaration
- Staffordshire Flexicare Housing Strategy 2010-2015
- Staffordshire Housing Support and Independence Strategy 2010- 2015
- Staffordshire Local Area Agreements
- Staffordshire Local Transport Strategy 2011 and East Staffs Draft Transport Strategy 2011 - 2026
- Staffordshire Moorlands District Local Plan
- Stoke-on-Trent and Staffordshire Strategic partnership, 2005
- The West Midlands Economic Strategy and Action Plan 2004 – 2010
- Trent Catchment Flood Management Plan
- West Midlands Energy Strategy
- West Midlands Green Infrastructure Prospectus

### **Local**

- East Staffordshire Sustainable Community Strategy 2008-2020
- East Staffordshire Rural Strategy, 2005
- East Staffordshire Housing Strategy, 2009-2014
- Economic Regeneration Strategy 2007 – 2012
- Carbon Management Strategy and Implementation Plan
- PPPG17 Open Space & Playing Pitch Strategy
- Admaston Conservation Area Appraisal
- Barton under Needwood Conservation Area Appraisal
- Burton upon Trent Conservation Area Appraisal
- Burton upon Trent No. 2 & 3 Conservation Area Appraisal
- Church Mayfield Conservation Area Appraisal
- Clarence/Street Anglesey Road Conservation Area Appraisal
- Ellastone Conservation Area Appraisal
- George Street Conservation Area Appraisal
- Hoar Cross Conservation Area Appraisal
- Horninglow Street/Guild Street Conservation Area Appraisal
- King Edward Place Conservation Area Appraisal
- Marchington Conservation Area Appraisal
- Middle Mayfield Conservation Area Appraisal
- Newborough Conservation Area Appraisal
- Rangemore Conservation Area Appraisal
- Rocester Conservation Area Appraisal
- Rolleston on Dove Conservation Area Appraisal
- Stanton Conservation Area Appraisal
- Station Street/Borough Road Conservation Area Appraisal
- Tatenhill Conservation Area Appraisal

- Trent and Mersey Canal Conservation Area
- Tutbury Conservation Area Appraisal
- Uttoxeter Conservation Area Appraisal
- Wootton Conservation Area Appraisal
- Yoxall Conservation Area Appraisal

## Task A2: Collecting baseline information

Schedule 2 Regulations 3 and 4 of the Environmental Regulations 2004 list the following to be included in Environmental Reports:

3: The environmental characteristics of areas likely to be significantly affected [and]

4: Any existing environmental problems which are relevant to the plan or programme including in particular, those relating to any areas of particular environmental importance.

**4.5** Baseline evidence was gathered to illustrate the current environmental, social and economic conditions in East Staffordshire. Alongside the Sustainability Objectives, this baseline information helped to identify sustainability issues and opportunities in the plan area, and inform the development of the Sustainability Appraisal Framework. The data aided the prediction and evaluation of potential effects of each stage of the plan, and will also be used at later stages during the appraisal process to monitor these predicted effects. The baseline data is contained in Appendix B.

**4.6** Guidance<sup>10</sup> recommends that the evidence collated should enable the following questions to be answered for each indicator:

- What is the current situation, including trends over time?
- How far is the current situation from thresholds, objectives or targets?
- Are the problems of a large or small scale, reversible or irreversible, permanent or temporary, direct or indirect?
- Are particularly sensitive or important elements of the environment, economy or society affected?
- How difficult would it be to prevent, reduce or compensate for any negative effect?
- Have there been / will there be any significant cumulative or synergistic effects over time?

<sup>10</sup> A Practical Guide to the Strategic Environmental Assessment Directive, 2005

**4.7** In line with the SEA Directive<sup>11</sup>, baseline evidence was collated as part of the SA Scoping Report, which responded to these checklist questions. The key issues identified by the baseline information are as follows:

- The Borough has a growing, but ageing population.
- Population projections predict an increase of some 16,000 people between 2008 and 2033. Migration accounts for a significant proportion of this population change.
- The Borough has a shortage of affordable housing. House prices have increased by 143% since 2001.
- With regards to housing mix, East Staffordshire has a higher proportion of detached properties than the national and regional average.
- In East Staffordshire the number of households is expected to increase by 11,778 (26%) between 2008 and 2033. The largest increase is expected to be in one person households.
- Deprivation in the Borough is concentrated in Burton on Trent. Since 2007 there has been a significant increase in the number of neighbourhoods that fall within the most deprived 10% from two to four.
- Economic activity in the Borough is increasing.
- The Borough has a varied economic base, which has undergone a substantial period of change, driven by industrial re-structuring, globalisation, reforms to agricultural policy and development of the growth of the service led economy.
- Despite the steady decline of the manufacturing industry over the last decade, the sector still is a dominant employer in the Borough.
- Flood risk is a key consideration in the allocation of land for development especially with the current concerns over climate change. A large part of the Burton area is within Flood Zone 2 and 3, which will have to be taken into account.

### **The Sustainability Issues for East Staffordshire**

**4.8** The baseline information and sustainability characteristics have informed the development of the key sustainability issues that relate to the Borough. The Key sustainability issues are set out in detail in Appendix C but are listed in the table below:

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<sup>11</sup> European Directive 2001/42/EC Annex I (e)

<b>Environmental</b>	<ul style="list-style-type: none"> <li>• Conserving and Enhancing Biodiversity</li> <li>• Flood Risk</li> <li>• Water quality and water demand</li> <li>• Air Quality</li> <li>• Greenhouse Gas Emissions</li> <li>• Cultural Heritage</li> <li>• Reduction in Waste sent to Landfill</li> <li>• Landscape and Countryside Character</li> </ul>
<b>Social</b>	<ul style="list-style-type: none"> <li>• Health Inequalities</li> <li>• Access to Open Space and sport facilities</li> <li>• Safer Communities</li> <li>• Multiple Deprivation</li> <li>• Ethnic Minorities</li> <li>• Poor Accessibility in Rural Areas</li> <li>• Housing Affordability in Rural Areas</li> <li>• Poor physical and mental health</li> </ul>
<b>Economic</b>	<ul style="list-style-type: none"> <li>• Unemployment Trends and Economic Activity</li> <li>• Town Centre Viability and Vitality</li> </ul>

**4.9** The SEA Directive requires a plan or programme proponents to identify “*the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme*” (Annex I (b), (c)). The baseline review identifies, using available data, the current state of the East Staffordshire area (in economic, social and environmental terms) and can provide clues as to the likely evolution of the Borough in the absence of the Local Plan and the vision and policies it will include.

**4.10** Predicting the nature of future trends is difficult as they will be influenced by a wide range of factors such as the global and national economic climate and decisions made at national and regional level. The baseline review indicated that the following trends may be likely to continue if the Local Plan was not implemented:

- Lack of housing choice – not being able to provide the right mix of housing for the Borough’s growing population
- Increasing shortage of affordable housing both in actual numbers and in the range of types available, linked to continuing high house prices
- Increased use of energy i.e. the domestic consumption of gas and electricity
- Growth in economic activity – continued growth in businesses but not necessarily in the right sector, providing the right jobs for local people
- Loss of employment land for new business development
- Continued low skills base level in the Borough
- More incidence of deprivation in Burton – particularly around health deprivation.
- Continued issues and problems with flooding in the Borough.
- Climate change

- School provision
- Air quality

**4.11** The details of the SA provided in this report provide a further insight in to the potential aspects of the current environment and their evolution without implementation of the Local Plan.

### **Task A3: Identifying environmental problems**

**4.12** Arising from the Borough's specific characteristics is a series of key priorities for sustainability. The identification of key sustainability issues (including environmental problems as required by the SEA directive) in East Staffordshire has been based on the review of plans and programmes, the evidence base, workshops and a consideration of the types of measures likely to be incorporated in the Local Plan. This has helped to indicate opportunities where the Local Plan could assist in addressing these issues. These opportunities were documented within the Scoping Report and can be found in Appendix B to this report.

### **Task A4: Developing sustainability appraisal objectives and framework**

**4.13** The Sustainability Appraisal Framework was developed at the Scoping stage and is the culmination of Tasks A1-A3. The SA Framework provides a methodological tool against which to assess the effects of the Local Plan. The SA Framework sets out the SA objectives, detailed guidance on the criteria for assessing effects and baseline indicators. The indicators provide a way in which the achievement of the objectives can be measured, and are used to predict:

- the likely trends in the baseline position, if each option were to be implemented, allowing for interactions between different options
- the likely success of each option in meeting the chosen objectives.

**4.14** Indicators provide an initial impression of how each option in the Local Plan will affect the current situation of the Borough, and the expected future situation.

#### **SA objectives**

**4.15** The Local Plan Sustainability Appraisal Scoping Report (February 2012) set out 16 sustainability objectives, details of which are set out below. Although aligned with the broad objectives set out by the government, these sustainability objectives are tailored to East Staffordshire's unique character profile, as well as the sustainability issues and opportunities currently facing the Borough. These objectives have been determined and revised through consultation with stakeholders.



4.16 The sustainability objectives are separate from the Local Plan strategic objectives. They act as targets, which enable the Local Plan strategic objectives and options to be tested in terms of their environmental, economic and social sustainability, as described in the Methodology. The achievement of these sustainability objectives is measurable by the indicators (see Appendix A).

**Table 4.2: Sustainability Appraisal Framework 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)

### Compatibility of SA objectives

4.17 As part of the process in drafting SA objectives, their compatibility is important. The matrix in Table 4.3 was used to demonstrate any tensions between objectives.

SAO 1																
SAO 2	✓															
SAO 3	✓	✓														
SAO 4	~	~	✓													
SAO 5	✓	✓	✓	✓												
SAO 6	?	*	~	✓	~											
SAO 7	✓	✓	✓	~	✓	*										
SAO 8	✓	✓	✓	~	✓	?	?									
SAO 9	?	?	~	✓	~	~	?	?								
SAO 10	✓	✓	✓	✓	✓	✓	✓	*	✓							
SAO 11	~	~	✓	✓	✓	~	~	~	~	~						
SAO 12	✓	✓	✓	~	✓	✓	✓	✓	~	~	~					
SAO 13	*	~	~	✓	✓	✓	~	*	~	✓	~	~				
SAO 14	*	*	~	✓	~	✓	~	*	~	✓	~	~	✓			
SAO 15	?	?	✓	✓	✓	✓	?	?	✓	✓	~	✓	~	~		
SAO 16	?	~	~	~	✓	✓	~	?	~	✓	~	~	✓	~	~	
	SAO 1	SAO 2	SAO 3	SAO 4	SAO 5	SAO 6	SAO 7	SAO 8	SAO 9	SAO 10	SAO 11	SAO 12	SAO 13	SAO 14	SAO 15	SAO 16

Table 4.3: Objective Compatibility

✓	Compatible objectives
*	Potential conflict
?	Unknown impact
~	No link

## Unknown impacts

### SAO 1 (Housing) and SAO 6 (Green Infrastructure and Open Space)

**4.18** Increasing the quantity of housing in the Borough is likely to reduce the quantity of green spaces, although new development will be encouraged to include new provisions or improvement to existing provisions.

### SAO 1 (Housing) and SAO 9 (Flood Risk)

**4.19** An increase in housing is likely to lead to a higher coverage of impermeable surfaces, which could be mitigated through the use of sustainable drainage systems and the development of brownfield sites in sustainable locations.

### SAO 1 (Housing) and SAO 15 (Water Quality)

**4.20** Impact of new development is unknown, but could be mitigated through developer contributions.

### SAO 1 (Housing) and SAO 16 (Countryside and Historic Environment)

**4.21** New housing, particularly in rural areas, has the potential to impact on built and natural historic environment assets. The use of sensitive, high quality design could lessen this impact.

### SAO 2 (Economy) and SAO 9 (Flood Risk)

**4.22** Diversification and intensification of employment uses could lead to a higher coverage of impermeable surfaces, which could be mitigated through the use of sustainable drainage systems and the development of brownfield sites in sustainable locations.

### SAO 2 (Economy) and SAO 15 (Water Quality)

**4.23** Impact of new development is unknown, but could be mitigated through developer contributions.

### SAO 6 (Green Infrastructure and Open Space) and SAO 8 (Rural Communities)

**4.24** Development in rural communities is likely to affect green infrastructure and open spaces, although could include new provisions or improvement to existing provisions.

### SAO 7 (Town Centre) and SAO 8 (Rural Communities)

**4.25** The conflict of interest between location of new development and growth could be mitigated through a balanced approach.

SAO 7 (Town Centre) and SAO 9 (Flood Risk)

**4.26** Increasing activity and residence levels in the town centre could lead to a higher coverage of impermeable surfaces, which could be mitigated through the use of sustainable drainage systems and the development of brownfield sites in sustainable locations.

SAO 7 (Town Centre) and SAO 15 (Water Quality)

**4.27** Impact of new development is unknown, but could be mitigated through developer contributions.

SAO 8 (Rural Communities) and SAO 9 (Flood Risk)

**4.28** Development in rural communities could lead to a higher coverage of impermeable surfaces, which could be mitigated through the use of sustainable drainage systems.

SAO 8 (Rural Communities) and SAO 15 (Water Quality)

**4.29** Impact of new development is unknown, but could be mitigated through developer contributions.

SAO 8 (Rural Communities) and SAO 16 (Countryside and Historic Environment)

**4.30** Development in rural areas has the potential to impact on built and natural historic environment assets. The use of sensitive, high quality design could lessen this impact.

**Potential conflicts**

SAO 1 (Housing) and SAO 13 (Landscape Quality)

**4.31** The development of new housing could have a detrimental impact on the surrounding landscape quality.

SAO 1 (Housing) and SAO 14 (Biodiversity and Geodiversity)

**4.32** Potential damage to biodiversity and geodiversity levels through construction of new housing.

SAO 2 (Economy) and SAO 6 (Green Infrastructure and Open Space)

**4.33** Diversification and intensification of employment uses could present a threat to green infrastructure and open spaces.

SAO 2 (Economy) and SAO 14 (Biodiversity and Geodiversity)

**4.34** Potential damage to biodiversity and geodiversity levels through diversification and intensification of employment uses.

SAO 6 (Green Infrastructure and Open Space) and SAO 7 (Town Centre)

**4.35** Increasing activity and residence levels in the town centre is likely to reduce the quality or quantity of green spaces.

SAO 8 (Rural Communities) and SAO 10 (Use of Land)

**4.36** Development in rural communities is likely to result in greenfield development and the loss of agricultural land.

SAO 8 (Rural Communities) and SAO 13 (Landscape Quality)

**4.37** Development in rural communities could have a detrimental impact on the surrounding landscape quality.

SAO 8 (Rural Communities) and SAO 14 (Biodiversity and Geodiversity)

**4.38** Potential damage to biodiversity and geodiversity levels through new development.

## **Task A5: Consulting on the scope of the sustainability appraisal**

**4.39** In compliance with the SEA Directive and UK consultation on the scoping report (Stage A) was held in June/July 2007 over a 5-week period. A refresh of the scoping report was undertaken in February/March 2012 over a 5-week period.

**4.40** Everyone on the Council's consultation database was contacted during the consultation phase of the scoping report and invited to comment. The SEA Statutory Consultees (Environment Agency, Natural England and English Heritage) were also consulted. The document was electronically available on the Council's website during the consultation period. A total of 23 responses were received and any changes decided upon as a result of comments and recommendations from the 5-week consultation period were incorporated into the relevant sections of the scoping report (final version published and available on the Council's website in July 2012). Responses to both Scoping Reports can be found in Appendices I and J.

# Chapter 5

## Stage B: Testing Plan Objectives (Task B1), Developing and refining Spatial Options (Task B2), and Assessing potential effects of the Strategic Options (Task B3) (Interim SA)

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**5.1** This section sets out the sustainability appraisal of the Local Plan objectives and vision, Spatial Options and Strategic Options contained in Preferred Options. The equivalent testing of the final strategy and policies set out in the Pre-Submission Local Plan is contained in chapter 6.

### **Task B1: Testing the plan objectives and vision against the sustainability framework objectives**

**5.2** In order to help improve the sustainability performance of the Local Plan, the SA process requires a commentary on the Plan's Vision as well as the testing of its options for compatibility with the Sustainability Objectives. Where potential conflicts are identified this may help improve the Local Plan objectives.

#### **The Local Plan Vision Appraisal**

**5.3** ESBC previously published a Vision for the Borough which provides the context for the Strategic Objectives, and the policies, which are now forming the basis of the new Local Plan. The Vision has featured in earlier Issues & Options documents, and has remained largely unchanged to date. In progressing the Plan towards submission and adoption, the Vision was assessed against the wider Sustainability Objectives, and overall it was clear that there is a good degree of alignment between them with no obvious or direct conflicts.

**5.4** Comments received through earlier consultation exercises indicate a good level of understanding and agreement with the Vision by many of our residents and other partners.

**5.5** The Council's Vision for the Borough focused on several core elements, with a strong emphasis on delivering a high quality of life, and ensuring choice and opportunity for residents. The SA concluded that the vision had direct implications and relevance to the physical characteristics and quality of the Borough, but also for the development of the local economy. Therefore, the Vision set out an appropriate context for the Local Plan in seeking to deliver economic growth in such a way that the quality of life and the quality of the Borough's environment is enhanced or



protected. The Vision therefore contained a range of elements which related directly to the economic, social, and environmental components of 'sustainable development'.

**5.9** Notwithstanding the strong degree of general compatibility between the existing Vision and the Sustainability Appraisal Objectives, the process of assessing the Vision through the SA process identified some minor modifications and clarifications which would further improve the strength of the relationships and consistency between them.

**5.10** These improvements were incorporated into the vision in the Preferred Options Local Plan. They included:

- a more explicit reference to the local efforts to address the challenge of climate change could be added to the Vision, building on the already strong references to environmental issues in general.

"The Council considers that sensitive management of housing growth, associated infrastructure and amenity improvements and commercial growth at an incremental rate will secure a transformation that will make the town an even more attractive place to live and to work, *while ensuring development reflects the need to adapt to, and mitigate against, the impacts of climate change.*"

"New development and Green Infrastructure must be fully integrated if the Borough is to realise the quality of development it expects in the future, *and this integration along with high design standards represent part of the Borough's response to climate change.*"

- references to the importance of encouraging and enabling more sustainable patterns of transport could also be added, specifically in the context of reducing the impacts of transport on Burton town centre, but also reducing car-dependency generally.

"Burton upon Trent will be recognised nationally as the "Capital" of the National Forest, with a high quality and diverse green infrastructure network *providing environmental, biodiversity, health, and sustainable transport opportunities.*"

- more could be made of the opportunities for health improvement through development of the Borough's Green Infrastructure network, and particularly the Borough's relationship with the National Forest.

"Incorporate significant green space into new developments to provide enhanced amenities, *and health related benefits.*"

## The Local Plan Strategic Objectives Appraisal

**5.11** A compatibility analysis of the Local Plan Strategic Objectives was undertaken using the Sustainability Appraisal Framework. Overall, the Local Plan Strategic Objectives performed well against the majority of Sustainability Objectives, although the appraisal did identify some recommendations for improvement of the Local Plan

Objectives. These recommendations have been taken forward to provide a strengthened set of Strategic Objectives that better align with the sustainability framework.

**5.12** Table 5.3 summarises the compatibility between the Local Plan Strategic Objectives and the Sustainability Appraisal Objective using the following scoring criteria:

✓	<b>Broadly Compatible</b> – pursuing the Local Plan objective is likely to help achieve the sustainability objective
*	<b>Potential Conflict</b> – pursuing the Local Plan objective may work against or prevent the sustainability objective being achieved
~	<b>No clear link</b> – the Local Plan objective is unlikely to have any direct influence on this sustainability objective
?	<b>Depends on Implementation</b> – by pursuing the Local Plan objective there may be mixed implications for the sustainability objective, depending on how it is pursued

**5.13** The Local Plan Strategic Objectives as set out in the Local Plan Preferred Options document are listed the tables 5.1.

**Table 5.1: Local Plan Strategic Objectives**

<b>Local Plan Strategic Objectives</b>	
<b>Objective 1:</b> <b>Cohesive communities</b>	To develop green infrastructure-led strategic housing growth leading to the creation of well designed communities that relate to existing urban forms, provide accessible green space, services and facilities and present opportunities to create individuality, community cohesion and well-being, whilst protecting and enhancing sensitive environments.
<b>Objective 2:</b> <b>Inner Burton Regeneration</b>	To regenerate Inner Burton upon Trent focused on pockets of physical and social deprivation by improving residential amenity, access to greenspace and quality of the environment.
<b>Objective 3:</b> <b>Housing choice</b>	To provide a mix of well designed, sustainable market, specialist and affordable homes that meet the needs of existing and future residents and responds to the ongoing and expected population change in the Borough.
<b>Objective 4:</b> <b>Accessibility and transport Infrastructure</b>	To ensure that new development will be supported by high quality transport infrastructure and designed in a way that reduces the need and desire to travel by car through encouraging the use of public transport, walking and cycling.
<b>Objective 5:</b> <b>Neighbourhood Planning</b>	To ensure local communities have opportunities to help plan their own neighbourhoods and positively and sustainably shape where development is located.
<b>Objective 6:</b>	To promote opportunities within Burton upon Trent to create a diverse town centre which supports an inclusive evening economy and also responds to

<b>Burton upon Trent Town Centre</b>	the needs of a growing population by enhancing town centre facilities, the retail offer, Green Infrastructure, public realm, and image, while ensuring development is of high quality and sustainable design.
<b>Objective 7: Uttoxeter Town Centre</b>	To support the thriving and attractive market town of Uttoxeter through new sustainable development to reinforce its multi-functional role as a key service and employment centre with a range of high quality and designed facilities that will serve and attract residents and businesses, including the provision of Green Infrastructure and public realm works.
<b>Objective 8: Economic Diversification</b>	To foster and diversify the employment base of Burton upon Trent to support higher growth and higher quality jobs, and the employment base of Uttoxeter to reduce the reliance on a limited number of employers, by allocating high quality sustainable employment sites and improving the environmental quality and image of these key economic centres by utilising Green Infrastructure.
<b>Objective 9: Rural Economy</b>	To sustain and enhance employment opportunities in the rural part of the Borough by promoting local distinctiveness and in particular make the most of employment and business opportunities associated with the National Forest.
<b>Objective 10: Heritage</b>	To create high quality places that capitalise on the role heritage has in promoting local distinctiveness, place making and supporting regeneration, in particular through the heritage assets of Burton upon Trent and the attractive historic qualities of Uttoxeter and the rural villages.
<b>Objective 11: Flood Risk</b>	To plan for and reduce the impacts of climate change including ensuring that new development in settlements along our river corridors in particular are not exposed to unnecessarily to the risk of flooding or increases the risk of flooding elsewhere.
<b>Objective 12: Prudent use of Resources</b>	To promote the prudent use of finite resources and the positive use of renewable resources, through the design, location and layout of development and by optimising the use of existing infrastructure.
<b>Objective 13: Countryside</b>	To protect, conserve and enhance the local countryside, character and quality of the landscape and the diversity of wildlife and habitats.

Table 5.2 sets out the appraisal of the compatibility of the Local Plan Strategic Objectives and the Sustainability Objectives.

**Table 5.2: Compatibility Matrix of the Local Plan Strategic Objectives and the Sustainability Objectives**

Local Plan Strategic Objective	Cohesive communities	Inner Burton Regeneration	Housing choice	Accessibility and transport Infrastructure	Neighbourhood Planning	Burton upon Trent Town Centre	Uttoxeter Town Centre	Economic Diversification	Rural Economy	Heritage	Flood Risk	Prudent use of Resources	Countryside
Housing	✓	✓	✓	✓	✓	✓	✓	✓	✓	~	✗	✗	✗
Economy	✓	✓	~	✓	✓	✓	✓	✓	✓	~	~	✗	✗
Transportation	✓	✓	~	✓	✓	✓	✓	✓	✗	~	~	✗	~
Climate change, energy and air quality	✓	✓	✓	✓	✓	✓	✓	✓	✗	~	✓	✓	~
High quality design and sustainability	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	~	~
Green Infrastructure and Open Space	✓	✓	~	✓	✓	✓	✓	✓	~	~	✓	~	✓
Town centre	✓	✓	✓	✓	~	✓	✓	✓	~	✓	✗	~	~
Rural Communities	✓	~	✓	✓	✓	~	~	~	✓	✓	~	~	✓
Flood risk	~	?	~	~	~	✗	~	~	~	~	✓	✓	~
Use of land	✗	✓	~	✓	~	✓	✓	~	~	~	✓	✓	~
Natural Resources	~	~	~	~	~	~	~	~	~	~	~	✓	✓
Quality of Life	✓	✓	✓	✓	✓	✓	✓	✓	✓	~	✓	~	✓
Countryside and Landscape quality	✓	✓	~	~	~	✓	✓	✗	✓	✓	~	✓	✓
Biodiversity and Geodiversity	✓	✓	~	~	~	~	~	~	?	~	✓	~	✓
Water Quality	✓	?	~	~	~	?	?	?	?	~	✓	✓	~
Historic Environment and Heritage Assets	✓	✓	~	~	~	✓	✓	?	?	✓	✓	~	?

## Commentary on the Compatibility between the Local Plan Strategic Objectives and the Sustainability Objectives as set out in the Interim SA Report

### Objective 1: Cohesive Communities

*To develop green infrastructure led strategic housing growth leading to the creation of well designed communities that relate to existing urban forms, provide accessible green space, services and facilities and present opportunities to create individuality, community cohesion and well-being, whilst protecting and enhancing sensitive environments.*

**5.14** The Sustainability Appraisal demonstrates that this is an effective objective that provides an overarching drive for the development of sustainable housing growth with a particular focus on the role of green infrastructure. The Objective acknowledges the importance of accessibility to existing urban areas and services and thereby aligns with the need to reduce travel and create cohesive communities. The Objective promotes the creation of high quality design, supported by Sustainability Objective 5.

**5.15** Through protecting and enhancing the natural environment, this objective supports the environmentally focused sustainability objectives.

### Objective 2: Inner Burton Regeneration

*To regenerate Inner Burton upon Trent focused on pockets of physical and social deprivation by improving residential amenity, access to greenspace and quality of the environment.*

**5.16** This Objective is generally compatible with the SA objectives, whilst with some aspects of the objective there are no clear links to the Sustainability Objectives. In particular, the regeneration of inner Burton should generate improvements in the housing mix, the local economy and bring transportation benefits. Development should be focused in sustainable brownfield locations, therefore reducing the need to travel and reducing the overall environmental impact of development. In addition, the Objective is aiming to increase access to greenspace, and hence there is the potential to enhance and provide new green infrastructure assets in areas with existing deficiencies. This Objective seeks to improve the quality of life of residents of inner Burton, as well as improving the vitality and viability of the Town Centre.

### Objective 3: Housing Choice

*To provide a mix of well designed, sustainable market, specialist and affordable houses that meet the needs of existing and future residents and responds to the ongoing and expected population change in the Borough.*

**5.17** This is a specific objective focused on the need to ensure that new housing respects the socio-economic profile of the Borough and the aim of creating balanced communities through access to affordable and specialist housing. The objective is considered compatible with the Sustainability Objectives, although several have no link to this Objective.

#### **Objective 4: Accessibility and Transport Infrastructure**

*To ensure that new development will be supported by high quality transport infrastructure and designed in a way that reduces the need and desire to travel by car through encouraging the use of public transport, walking and cycling.*

**5.18** The Objective encourages long term positive impacts in relation to access to facilities and achieving a modal shift to more sustainable modes of transport. This in turn supports Sustainability Objectives relating to climate change and pollution. Indirect benefits of the Objective may also support Sustainability Objectives concerning economic development and health and wellbeing.

**5.19** There are a number of areas where the Local Plan objective has no link with the sustainability objective.

#### **Objective 5: Neighbourhood Planning**

*To ensure local communities have opportunities to help plan their own neighbourhoods and positively and sustainably shape where development is located.*

**5.20** This Objective reflects the growing emphasis on the role of communities in shaping Local Planning and the wider Localism agenda (under the Localism Act and the National Planning Policy Framework). The Objective is specific and therefore has no relationship with several of the Sustainability Objectives. It is however broadly compatible with those linked to cohesive communities and quality of life.

#### **Objective 6: Burton upon Trent Town Centre**

*To promote opportunities within Burton upon Trent to create a diverse town centre which supports an inclusive evening economy and also responds to the needs of a growing population by enhancing town centre facilities, the retail offer, green infrastructure, public realm, and image, whilst ensuring development is of high quality and sustainable design.*

**5.21** This Objective is broadly compatible with the Sustainability Objectives, whilst there is potential for conflict with those concerning flood risk and water resources. A large area of Burton upon Trent town centre is designated as within a Flood Zone 3 area, with the remainder identified as being with Flood Zone 2 area. As such, there are issues concerned with development in the flood plain. However, it is considered that these could be adequately dealt with at the implementation and design stage



and regulated by the relevant flood risk policy framework. In addition, the River Trent runs adjacent to the town centre and serves the town's water resource requirements. Development in this area would place an increased pressure of water related infrastructure, although this would be regulated by the utilities industry, therefore the impact would depend on implementation.

**5.22** The enhancement of green infrastructure and design of the public realm would help to adapt to the impacts of climate change.

#### **Objective 7: Uttoxeter Town Centre**

**To support the thriving and attractive market town of Uttoxeter through new sustainable development to reinforce its multi-functional role as a key service and employment centre with a range of high quality and designed facilities that will serve and attract residents and businesses, including the provision of green infrastructure and public realm works.**

**5.23** This Objective is broadly compatible with the Sustainability Objectives. Many of the issues are similar to those identified with the Burton upon Trent town centre objective. The enhancement of green infrastructure and design of the public realm would help to adapt to the impacts of climate change. Development in this area would place an increased pressure of water related infrastructure, although this would be regulated by the utilities industry, therefore the impact would depend on implementation.

#### **Objective 8: Economic Diversification**

***To foster and diversify the employment base of Burton upon Trent to support higher growth and higher quality jobs, and the employment base of Uttoxeter to reduce the reliance on a limited number of employers, by allocating high quality sustainable employment sites and improving the environmental quality and image of these key economic centres by utilising Green Infrastructure.***

**5.24** This strategic objective is broadly compatible with the sustainability objective, particularly in relation to housing, economy, high design quality and sustainability, town centre, flood risk and quality of life. There is clearly a strong link between the economic diversification objective and housing and economy Sustainability Objectives. In addition the objective seeks to ensure high quality design and therefore improve people's quality of life.

**5.25** There is potential for conflict in relation to the Countryside and Landscape quality sustainability objective, which is related purely to the nature of economic development.

### **Objective 9: Rural Economy**

**To sustain and enhance employment opportunities in the rural part of the Borough by promoting local distinctiveness and in particular make the most of employment and business opportunities associated with the National Forest.**

**5.26** This objective is broadly compatible with the sustainability objective, particularly in relation to housing, economy, high quality design, rural communities and quality of life. However, there are conflicts with regards transportation and climate change. More economic development in rural areas will lead to increased traffic in rural areas, and hence impact upon climate change by increasing emissions. Ensuring that employment is provided close to existing settlements and that there are sufficient public transport links will help to minimise these conflicts.

### **Objective 10: Heritage**

**To create high quality places that capitalise on the role heritage has in promoting local distinctiveness, place making and supporting regeneration, in particular through the heritage assets of Burton upon Trent and the attractive historic qualities of Uttoxeter and the rural villages.**

**5.27** The Objective successfully promotes a positive aim for the conservation and enjoyment of the historic environment and the recognition of the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring. It more specifically reflects the sustainability issue identified in the Scoping Report, concerning the need to protect and enhance heritage assets at risk. The Objective is broadly compatible with relevant Sustainability Objectives.

### **Objective 11: Flood Risk**

**To plan for and reduce the impacts of climate change including ensuring that new development in settlements along our river corridors in particular are not exposed to unnecessarily to the risk of flooding or increases the risk of flooding elsewhere, recognising the benefit of Green Infrastructure.**

**5.28** This Objective is broadly compatible with the Sustainability Objectives with the exception of housing and the town centre. Planning for and reducing flood risk provides key opportunities to provide multi-functional green infrastructure links and assets, contributing to improved use of land, biodiversity and geodiversity and improved water quality.

**5.29** There are strong links with reducing flood risk and climate change, green infrastructure and potential for improving design and sustainability of development. There is potential conflict around the delivery of housing, although this would depend on implementation and mitigation measures e.g. SUDs and flood zone development. There is also potential conflict in relation to town centre development which may

increase flood risk – this could be mitigated against through robust wording in the policy.

### **Objective 12: Prudent uses of Resources**

**To promote the prudent use of finite resources and the positive use of renewable resources, through the design, location and layout of development and by optimising the use of existing infrastructure.**

**5.30** The Objective supports the wider environmental agenda of protecting the natural environment and is therefore compatible with a range of Sustainability Objectives, in particular climate change, energy, use of land, natural resources, flood risk and water quality. The Objective advocates the use of renewable resources through the design, location and layout of development.

**5.31** There is potential for this Objective to conflict with Sustainability Objectives promoting the delivery of housing and the achievement of a prosperous and competitive economy. However, this can be mitigated by an effective local policy framework that draws on national planning policy and best practice guidance supporting the reuse of existing resources and the use of renewable resources. In addition the optimisation and use of existing infrastructure will require effective policy to ensure new development makes an appropriate contribution to the maintenance and capacity of existing infrastructure.

**5.32** The Objective is broadly compatible with the Sustainability Objectives, although there will be recurring competing concerns around the need to balance the priorities of conserving natural resources and supporting an increasing population and economic growth, which can be managed through appropriate policy.

### **Objective 13: Countryside**

**To protect, conserve and enhance the local countryside, character and quality of the landscape and the diversity of wildlife and habitats.**

**5.33** This objective is broadly compatible with the sustainability objectives, particularly in relation to the protection of the environment, natural resources and countryside and landscape quality. This objective will also help to conserve and enhance biodiversity and geodiversity in the Borough. There are potential conflicts around the provision of housing and economic diversification. This reflects the need to balance the priorities of conserving the countryside and supporting an increasing population and economic growth, which can be managed through appropriate policy.

### **Summary of Local Plan Strategic Objectives**

**5.34** Whilst overall the plan objectives are compatible with the sustainability objectives and are likely to contribute to achieving sustainable development, there are some areas of potential conflict. This is inevitable considering the need to

balance social, economic and environmental objectives and to accommodate development growth whilst protecting the high quality of the Boroughs environment. These conflicts can be managed through appropriate policy.

**5.35** In a number of cases it is difficult to judge the degree of compatibility between sustainability and plan objectives given the broad level of detail the plan objectives contain. For example, economic development within the Borough has the potential to adversely affect the landscape of the Borough and historic and heritage assets if delivered in an inappropriate way, however other objectives seek to conserve and enhance the landscape of the Borough and protect and enhance heritage.

**5.36** This analysis assists in considering the effects of the Local Plan and potential areas where mitigation measures or amendments to the plan may be required.

## **Task B2: Develop and refine the Spatial Options and Task B3: Test and predict the potential effects of the Strategic Options**

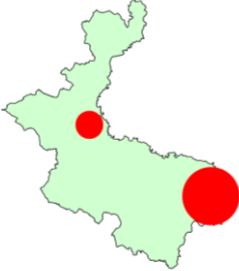
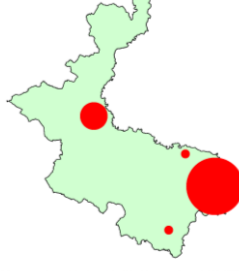
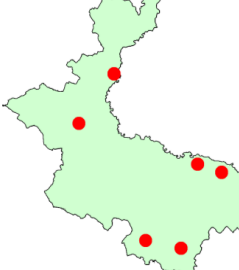
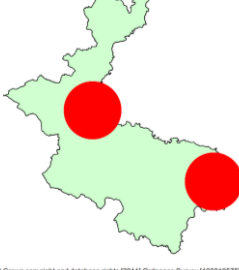

**5.37** In preparing the Local Plan a number of options for the distribution of growth have been considered and tested through the Sustainability Appraisal process. This process has helped to determine if an option should form part of the Spatial Strategy in full, in part, or in combination. Initial considerations were derived through strategic thinking about the distribution of growth across the Borough and the deliverability of development in accordance with the sites identified in the Strategic Housing Land Availability Assessment.

### **Spatial Options**

**5.38** Previous options presented in consultations were based on the emerging West Midlands Regional Spatial Strategy (RSS) planning framework prepared by the Regional Assembly which sought to direct 85% of growth to Burton to support its status as a sub regional location for growth. The RSS is still a planning consideration although was revoked in March 2013. The Preferred Option was based on a bottom-up evidence base approach rather than the previous top down approach of regional planning. The following options were been considered by the Council and tested through this SA process to determine if they should form part of the Local Plan in full, in part or in combination. Initial considerations were aimed at strategic thinking about the distribution of growth more generally across the Borough.

The Spatial Options identified are set out in Table 5.3:

**Table 5.3 Spatial Options**

<b>Option 1</b>	Urban extensions	Development in Burton and Uttoxeter, no village development	 <p><small>© Crown copyright and database rights [2011] Ordnance Survey [100010575]</small></p>
<b>Option 2</b>	Urban extensions plus villages	Development in Burton and Uttoxeter plus two or more strategic villages	 <p><small>© Crown copyright and database rights [2011] Ordnance Survey [100010575]</small></p>
<b>Option 3</b>	Equal distribution	Development distributed equally across villages and towns	 <p><small>© Crown copyright and database rights [2011] Ordnance Survey [100010575]</small></p>
<b>Option 4</b>	Single urban focus	All development to be in just Uttoxeter or Burton	 <p><small>© Crown copyright and database rights [2011] Ordnance Survey [100010575]</small></p>
<b>Option 5</b>	New Settlement	Create a brand new settlement on green field land in a more rural location	 <p><small>© Crown copyright and database rights [2011] Ordnance Survey [100010575]</small></p>

**5.39** A sustainability appraisal of each Spatial Option was undertaken which assessed the broad principles of each development scenario against the sustainability appraisal framework. Table 5.4 provides a summary of the outcome of

this process, whilst a more detailed narrative to the appraisal is provided in Appendix E. The following scoring criteria was used:

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

Table 5.4: Sustainability Appraisal of Spatial Options

Local Plan Options	Option 1 Urban Extensions	Option 2 Urban Extensions plus villages	Option 3 Equal Distribution	Option 4 Single Urban Focus		Option 5 New Settlement	Commentary
				Burton	Uttoxeter		
SA Objective							
Housing	✓	✓✓	✓	✓	✓	✓	<ul style="list-style-type: none"> <li>All options are able to provide a decent housing mix</li> <li>Option 2 scores higher because it meets urban and rural need in appropriate proportions.</li> </ul>
Economy	✓	✓✓	✓	✓	✓	✓	<ul style="list-style-type: none"> <li>All options will provide employment land and help to achieve a prosperous and diverse economy</li> <li>Option 2 scores higher because some employment could be delivered in strategic villages.</li> </ul>
Transportation	✓✓	✓	✓	✓✓	✓✓	-	<ul style="list-style-type: none"> <li>Option 1 and 4 concentrate development in the urban areas and hence provide the most opportunity for using sustainable modes of transport and making the best use of existing infrastructure.</li> <li>Options 2 and 3 would require a small amount of development in rural areas which presents less opportunity</li> <li>Option 5 would require a significant level of new transport infrastructure resulting in a negative score.</li> </ul>
Climate change, energy and air quality	-	-	-	-	-	-	<ul style="list-style-type: none"> <li>All options have potential to contribute to the causes of climate change; however mitigation measures are achievable to reduce the likelihood of a negative impact.</li> <li>However, this could be mitigated against to ensure development is the most</li> </ul>



Local Plan Options	Option 1 Urban Extensions	Option 2 Urban Extensions plus villages	Option 3 Equal Distribution	Option 4 Single Urban Focus		Option 5 New Settlement	Commentary
				Burton	Uttoxeter		
SA Objective							sustainable type and location
High quality design and sustainability	✓✓	✓✓	✓	✓	✓	✓✓	<ul style="list-style-type: none"> <li>All options are likely to have a positive impact on achieving high quality design and sustainable buildings if relevant policy requirements are delivered. Options containing SUE's have the ability to masterplan sites from the outset.</li> <li>Option 4 directs growth to Burton upon Trent or Uttoxeter only and would therefore limit significant effects Borough wide.</li> </ul>
Green Infrastructure and Open Space	✓✓	✓✓	-	✓✓	✓✓	✓✓	<ul style="list-style-type: none"> <li>Options 1, 2, 4 and 5 will deliver significant green infrastructure due to the scale of the SUE's required.</li> <li>Option 3 scores a negative because this option presents less opportunity to provide green infrastructure due to smaller quantum associated with a strategy which distributes growth equally.</li> </ul>
Town centre	✓✓	✓✓	✓	✓	✓	—	<ul style="list-style-type: none"> <li>Option 3 limits benefits to the town centres by distributing growth across the rural areas.</li> <li>Option 4 - whilst benefits will be channelled to the town centres this option does not meet need across the Borough – only one town centre benefits.</li> <li>Option 5 scores a double negative because a new settlement would not support existing Burton and Uttoxeter town centres.</li> </ul>
Rural Communities	-	✓✓	✓	-	-	-	<ul style="list-style-type: none"> <li>Options 1, 4 and 5 lack opportunities to support rural communities, whereas Option 2 seeks to meet rural need.</li> <li>Option 3 directs significant growth to rural areas but there is a mismatch between location of development and need.</li> </ul>
Flood risk	-	-	-	-	-	-	<ul style="list-style-type: none"> <li>Flood risk is a significant issue in large areas of the Borough. Appropriate mitigation would be required to ensure that the risk of flooding is not increased to new and existing communities. Appropriate sustainable drainage strategies would also be required. Mitigation measures would be required to respond to site specific flood risk issues.</li> </ul>

Local Plan Options	Option 1 Urban Extensions	Option 2 Urban Extensions plus villages	Option 3 Equal Distribution	Option 4 Single Urban Focus		Option 5 New Settlement	Commentary
				Burton	Uttoxeter		
SA Objective							
Use of land	✓	✓	-	✓	-	--	<ul style="list-style-type: none"> <li>Option 1-4 will deliver brownfield development however the quantum associated with each option are not strategically distinctive.</li> <li>Uttoxeter Option 4 where the focus of development is solely on the town scores less well due to the proportion of brownfield development in comparison with the large amount of greenfield land that would be required.</li> <li>Option 3 scores negatively because significant levels of rural growth exclude brownfield development.</li> <li>Option 5 would not deliver any brownfield land.</li> </ul>
Natural Resources	✓	✓✓	-	✓	✓	✓✓	<ul style="list-style-type: none"> <li>Option 2 scores very positively because it delivers development to meet needs across the Borough.</li> <li>The strategy for delivering growth to meet Option 3 does not score well because the distribution of growth across the Borough presents less opportunities to use resources prudently.</li> <li>All options delivering large SUE's – 1,2 and 4 scores positively because the scale of development proposed provides opportunities to use resources efficiently.</li> <li>Option 5 scores very positively due to the potential for the new settlement to deliver exemplar eco-credentials.</li> </ul>
Quality of Life	✓	✓✓	-	✓	✓	✓	<ul style="list-style-type: none"> <li>Options 1, 2, 4 and 5 deliver SUE development which has the potential to design out crime, create safe communities and deliver communities benefits owing to the size of the developments. Option 2 scores higher because there is potential to deliver a sustainable communities in both urban and rural areas.</li> <li>Option 3 does not distribute growth in a way that meets the needs of the Borough and due to the smaller nature of the sites does not present opportunities to design and masterplan.</li> </ul>
Countryside and Landscape quality	✓	✓	-	✓	--	--	<ul style="list-style-type: none"> <li>Options 3, 4 for Uttoxeter and Option 5 will have significant impacts, Options 4 and 5 particularly due to the setting of a new settlement in the countryside.</li> <li>Options 1, 2 and 4 for Burton have the potential to incorporate the landscape setting into proposals.</li> </ul>

Local Plan Options	Option 1 Urban Extensions	Option 2 Urban Extensions plus villages	Option 3 Equal Distribution	Option 4 Single Urban Focus		Option 5 New Settlement	Commentary
				Burton	Uttoxeter		
SA Objective							
Biodiversity and Geodiversity	-	-	-	-	-	-	<ul style="list-style-type: none"> <li>All options are likely to have a negative impact on biodiversity and geodiversity, which can be reduced or avoided with appropriate mitigation, due to the substantial development of greenfield land.</li> </ul>
Water Quality	0	0	0	0	0	0	<ul style="list-style-type: none"> <li>All options will require an increase in water supply, which may require the enhancement of water related infrastructure to meet quality requirements. This is regulated by relevant legislation and the options are therefore unlikely to have a significant impact.</li> </ul>
Historic Environment and Heritage Assets	?	?	?	?	?	?	<ul style="list-style-type: none"> <li>The potential for an impact on heritage assets will be ascertained by site specific heritage assessments to determine the location and presence of heritage assets and the likelihood of effect in relation to the proposed development.</li> </ul>

The following commentary sets out the conclusion of the appraisal of each option taken from the Interim Sustainability Appraisal Report.

### Spatial Option 1 Urban Extensions, no village development

#### Broad Principles

**5.40** This option assumes that in addition to brownfield sites, greenfield extensions are required to deliver growth in Burton upon Trent and Uttoxeter only. Growth would not be directed to any of the villages in the rural areas. By directing growth to the urban areas only this option has the potential to meet the needs of the majority of the people living in the Borough and as such would meet many of the Local Plan Strategic Objectives, in particular those relating to the development of housing, employment, the town centres and more generally urban regeneration. Directing growth to the urban areas has the potential for investment in infrastructure and the creation of sustainable communities.

#### Conclusion

**5.41** The Sustainability Appraisal identifies a positive contribution to a range of Sustainability Objectives. The option provides an opportunity for a focus on sustainable urban extensions in the Borough's urban areas; with the provision of housing, employment, economic growth and public transport infrastructure to support the majority of the Borough's population.

**5.42** The option would achieve the delivery of housing in the areas of greatest need, Burton-upon-Trent and Uttoxeter. However, it would fail to ease housing needs in rural areas, and in particular would not address issues of affordability in rural areas.

**5.43** Large scale development offers real opportunities for 'place making' by achieving significant new settlements, with high quality design, green infrastructure and open space, and a good mix of housing and employment land.

**5.44** Focussing development in the main towns of Burton and Uttoxeter creates the opportunity for the provision of well designed greenfield urban extensions that will meet the needs of the urban areas. This option provides an opportunity for self sufficient new housing and employment growth where local impacts are minimised through the provision of existing facilities, infrastructure and leisure opportunities and new provisions where required. An urban focus would also tackle wider regeneration issues and in particular support an improved and enhanced town centre. It will not however meet rural housing needs and will require substantial environmental and transport mitigation, for these reasons this option has been rejected

## **Spatial Option 2 Urban Extensions plus Villages**

### **Broad Principles**

**5.45** This Option assumes that in addition to brownfield sites, greenfield urban extensions are required to deliver growth in Burton upon Trent and Uttoxeter with some limited growth in the rural areas. This option has the potential to meet the needs of all residents in the Borough and therefore the strategic objectives of the Local Plan. Rural housing can support rural employment and enterprise and create opportunities to reduce car travel.

### **Conclusion**

**5.46** The conclusion to Option 2 is the same as Option 1 but with the following additional benefits which leads to a stronger sustainability performance. The distinct difference and the reason why Option 2 scores very positively in relation to housing and employment objectives when compared with Option 1 is because growth is directed to rural areas to provide Borough-wide housing and employment choice and variety. Development in the rural areas supports communities and provides opportunities to live and work in the same place without the need to travel. This has the potential to off-set increased car travel associated with rural areas and in particular supports public transport through potential increased patronage.

**5.47** Option 2 scores less well in relation transport, because rural areas are inherently less sustainable because they do not have the same level, nor could they ever sustain, significant levels of services and facilities. As previously mentioned some sustainable travel would be supported in rural areas and the provision of limited growth assists with reducing some journeys. The strategic villages in particular provide services and facilities which support daily needs for a wider rural

hinterland, reducing the need for residents to travel to main urban centres. Growth in these settlements will ensure that these services and facilities are supported.

**5.48** In the strategic villages development would have to be sympathetic and appropriate to their needs and strong policies would be needed to ensure any housing growth is supported by an increase in the capacity of existing (or provision of new) services and facilities to enhance the vitality and viability of the village centres. The provision of development in rural areas will improve the quality of life of village residents particularly the young and old who require housing options to meet their needs.

**5.49** Burton and Uttoxeter would remain the main service centres and the focus of economic activity. Growth in the main urban areas would increase demand for existing facilities and services, providing an opportunity to enhance the town's service offer.

**5.50** The appraisal of this option therefore arrives at a positive sustainability performance over and above that of Options 3, 4 and 5 and in particular Option 1 which it is almost identical to except that Option 2 delivers rural housing to meet local needs. The rural areas need some housing choice to allow communities the opportunity to grow and to ensure that facilities and services such as shops and schools continue to be supported thereby reducing unnecessary travel to Burton and Uttoxeter. The option provides a more balanced approach to growth, addressing rural needs whilst placing the majority of growth in the main urban centres to meet the majority of the Borough's need. This is therefore the preferred option.

### **Spatial Option 3 Equal Distribution across towns and villages**

#### **Broad Principles**

**5.51** This Option assumes that there will be more greenfield development across the Borough due to the lack of brownfield opportunities in the rural areas.

**5.52** Equal distribution will result in Burton upon Trent not receiving significant levels of growth which has the potential to outstrip development needs. Given that the greatest development needs are in Burton there is potential for the Local Plan strategic objectives to not be met. However, there will be some benefits to rural areas such as the provision of affordable housing.

#### **Conclusion**

**5.53** The key distinction of this Option is that like Option 2 it would include development across both the towns and villages, but this would be an equal distribution. This would therefore distribute the housing need and employment land across Burton, Uttoxeter and the strategic villages, thereby not reflecting the concentration of need in the towns.



**5.54** The Option would have significant implications for infrastructure capacity, requiring substantial upgrades to physical (i.e. transport), green and social infrastructure to serve growth in the rural areas and provide connections to the main towns.

**5.55** This Option is likely to have a negative effect on the town centre Objective, with the potential for detracting growth and regeneration from the urban areas. However, the Option would bring an opportunity to enhance connectivity to the rural areas, with transport improvements, and distribution employment opportunities to the wider Borough. However, as the scale of development is not likely to be significant in one location it is unlikely to achieve significant economies of scale and therefore bring the range of benefits that a large scale development could offer.

**5.56** The Option could bring adverse environmental impacts to a wider area in reflection of dispersing development across settlements. For example, this is likely to result in local air quality being compromised across a wider geographic area, due to anticipated increase in vehicle movement and economic activities. There is also an increased likelihood of impact on high quality landscapes, biodiversity and the use of natural resources across the Borough. A particular concern will be the ability of rural areas to accommodate development on previously developed land, and thereby place an increase pressure on greenfield land.

**5.57** The Option would have the advantage of delivering affordable housing to rural areas experiencing a lack of housing choice.

**5.58** Equal distribution whilst meeting some need across the Borough, will result in significant additional growth in rural areas and Uttoxeter and not enough growth in Burton. As a consequence there will be environmental harm in the rural areas particularly in terms of landscape impact, greenfield development and the ability of existing settlements to grow and accommodate change in terms of infrastructure capacity. Burton on the other hand would have regeneration initiatives undermined, in particular improvements to the town centre offer and development need would not be met. This option would not respond to existing need, infrastructure capacity and regeneration initiatives and it therefore has therefore been rejected.

## **Spatial Option 4 Single Urban Focus**

### **Broad Principles**

**5.59** This option would result in brownfield and greenfield development in Burton-upon-Trent or Uttoxeter only. Whilst this approach might have benefits in delivering sustainable communities with associated infrastructure, the lack of development elsewhere would create the need to travel to access employment and service opportunities. The Strategic Objectives are met in part, in relation to a single focus of growth in Burton upon Trent where the majority of the Borough's residents live, however this is not the same if all development is focused on Uttoxeter.

## Conclusion

**5.60** In contrast to Option 3, Option 4 would concentrate growth within and surrounding Burton-upon-Trent or Uttoxeter only with the development of brownfield and greenfield land.

**5.61** The Option aligns well with Sustainability Objectives concerning town centre, use of land, transportation and economic development. The option would bring a real opportunity for urban regeneration of Burton-upon-Trent and its most deprived areas. The option would offer a more efficient use of land, concentrating growth within and extending from the main urban areas. In doing so, the Option would decrease the need to travel with an increase in people living and working within the central area and its transport network.

**5.62** Concentrating all development in Uttoxeter would have a much bigger impact on the current community as the town is much smaller, and so could not cope with as much growth. There is also less brownfield land available in Uttoxeter and so this option would require significantly more Greenfield land development. In addition, significant areas of brownfield land in Burton would not be developed, which would result in an inefficient use of land in the town.

**5.63** However, the option would not address needs in the wider Borough in respect of housing choice, services and local employment opportunities, and as such could result in a negative effect on quality of life for the wider Borough in the longer term.

**5.64** This approach could help protect sensitive landscape and countryside from development, however due to the lack of available brownfield sites; greenfield extensions would also be required. With regard to the urban area, it would be important to ensure that brownfield development compliments the existing built environment and respects heritage in terms of conservation areas and listed buildings.

**5.65** As the main town in the Borough the appraisal suggested that Burton would benefit from being the single urban focus for growth. Significant growth would underpin regeneration, brownfield development and town centre renewal providing infrastructure is in place to support it, particularly transport. Significant greenfield sites would also be needed and could be delivered in a sustainable way. However, development needs across the Borough would not be met and employment opportunities and services generated in Burton would be accessed by travelling from other parts of the Borough which would have a significant impact on the environment.

**5.66** If Uttoxeter was the single urban focus for growth, the benefits would not be as significant because the town is much smaller and all growth in this area would swamp the current town, and not provided housing in the area of need. In addition there is less brownfield land available in Uttoxeter and so this option would require significantly more Greenfield land development on the edge of the town.

**5.67** Similarly to option 1, but with an increased sole urban focus, this option would not address wider employment and housing needs across the Borough and has therefore been rejected.

## **Spatial Option 5 New Settlement**

### **Broad Principles**

**5.68** This Option directs all growth to a single new settlement. Development would be on a rural greenfield site and masterplanned from the outset to deliver a sustainable community. It is important to emphasise that no sites have been identified that would be large enough to accommodate a new settlement that would deliver the Borough's housing need. As no sites have been identified for this option, only a high level Sustainability Appraisal can be undertaken that is based on the sustainability of a new settlement as a 'concept' to deliver the Borough's housing requirement with no spatial reference.

**5.69** The option of a new settlement was identified in the previous Strategic Options Consultation document, and since then it has been concluded that the Option does not present a reasonable alternative as it does not meet the Strategic Objectives of the Local Plan and no sites have come forward to deliver the Option.

### **Conclusion**

**5.70** A new settlement would provide an opportunity to achieve 'flagship' high quality sustainable homes and employment uses, such as those promoted by 'ecotown' developments, necessary to offset the environmental impacts of a new settlement.

**5.71** The concept of a new settlement would require the revaluation of the Borough's settlement hierarchy, with the potential of introducing a new town to the existing settlement hierarchy. A new settlement would have the benefit of sustaining a range of local services, community facilities and jobs that could be provided alongside the provision of housing offering a high quality of life for potential residents.

**5.72** A new settlement would require a substantial area of greenfield land that could have significant environmental impacts on biodiversity, heritage assets, landscape quality, natural resources, flood risk and air quality. Substantial mitigation measures would be required to reduce its impact on the environment.

**5.73** Due to the contained nature and size of a new settlement there would be significant requirements for new infrastructure, with little possibility of relying on upgrades to existing infrastructure provisions. In particular transport infrastructure, including the public transport and highways network to help mitigate a significant generation of car based trips and congestion to the wider area.

**5.74** Appraising this option required balancing the ability of a new settlement to have significant excellent sustainability credentials to minimise the immediate impact of the settlement upon the environment, against the environmental harm of delivering a

new settlement in the open countryside in a very rural area. It is acknowledged that this option would generate car trips within the wider rural area and would require significant new infrastructure provision. No sites have come forward that could accommodate the development necessary to meet the housing and employment target, as such only the concept of a new settlement has been assessed. The option would fail to accord with many of the sustainability and Local Plan objectives and is therefore not been taken forward.

## **Overall Conclusions from the appraisal of development strategy options (stage B?)**

**5.75** In conclusion, Option 2 (Urban Extensions plus villages) is identified as the most sustainable option because the majority of growth is concentrated in the urban areas of Burton and Uttoxeter, with a smaller allocation to the strategic villages. This option provides a more balanced approach to growth, addressing rural needs whilst placing the majority of growth in the main urban centres and areas of need.

**5.76** Concentrating development in urban extensions around Burton and Uttoxeter would encourage growth in areas surrounding the towns. Major new developments, extending from the two towns would increase demand for existing facilities and services, providing an opportunity to enhance the town's service offer. The extensions could provide a mix of uses providing employment and community facilities accessible to the towns.

**5.77** Development in the strategic villages will provide some housing choice to allow communities the opportunity to grow and to ensure that facilities and services such as shops and schools continue to be supported thereby reducing unnecessary travel to Burton and Uttoxeter.

**5.78** Whilst Option 1 (Urban Extensions) would provide similar benefits to Option 2, the lack of development in villages would not provide and meet the need for rural housing, and therefore benefits would be reduced for the rural areas.

**5.79** In Option 3 (Equal Distribution) the benefits are reduced as development is spread across the Borough and therefore the economies of scale and increased benefits will not be felt through large scale development in the urban area. In addition, development spread will be inappropriate to all settlements as not all can cope with the amount of development proposed.

**5.80** Option 4 (single urban focus) is not taken forward as the Preferred Option as development would be concentrated in just one urban area and therefore development needs across the Borough would not be met and employment opportunities and services generated in Burton or Uttoxeter would be accessed by travelling from other parts of the Borough which would have a significant impact on the environment.

**5.81** Whilst Option 5 (New Settlement) would create the opportunity to deliver a high quality sustainable town, this would significantly impact on the existing settlements in the Borough, not to mention the impact upon the environment in terms of delivering a new settlement in the open countryside in a very rural area.

**5.82** The Sustainability Appraisal demonstrates the superior sustainability performance of Option 2: Urban Extensions plus villages, whilst acknowledging that mitigation would be required to meet the demands of some sustainability measures. Such mitigation is common to all the Options tested, although in the case of the new settlement option, these measures would need to be of a significant degree and in some instances unlikely to fully mitigate a potential negative impact resulting in an adverse effect.

**Following the Sustainability Appraisal Option 2 was taken forward as the Preferred Spatial Strategy**

**5.83** Once Option 2 was determined as the Preferred Spatial Option, strategic site options that could deliver the option were selected. The following paragraphs provide an appraisal of the more detailed sub-options, known as Option 2a, 2b, 2c and 2d.

**Task B3: Identifying and Refining the Preferred Strategic Option**

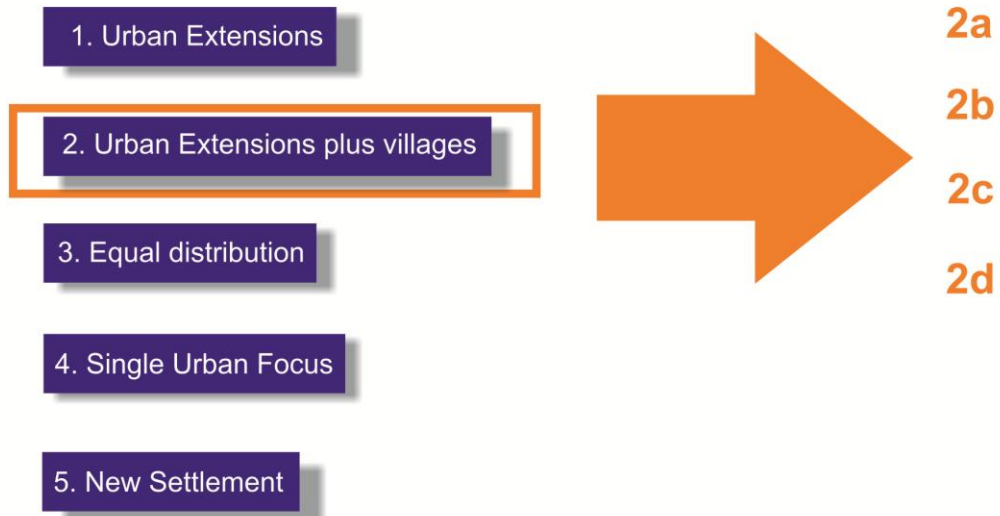
**5.84** The next stage of the preparation of the Local Plan was to select and assess the strategic locations available to deliver the preferred distribution of growth. Four options, illustrated in figures 5.2 – 5.5, that each offer broad strategic locations which might comprise the ‘urban extensions plus village development’ approach were identified. These options each include a combination of extensions to Burton-upon-Trent and Uttoxeter and an allocation of development to the strategic villages. The approach therefore concentrated on the performance of Burton and Uttoxeter as the focus of development and the strategic sites likely to be associated with the delivery of the sub-option.



Figure 5.1: Refinement of Options

### High-level Assessment of Spatial Options

### Strategic Options



KEY			
	East Staffordshire Boundary		Housing and Employment
	Existing built up Areas		Indicative Directions for Growth
	Housing		Housing within Burton and Uttoxeter Urban Areas

Figure 5.2: 2a Concentrating growth on two sites in Burton and some growth in Uttoxeter and strategic villages

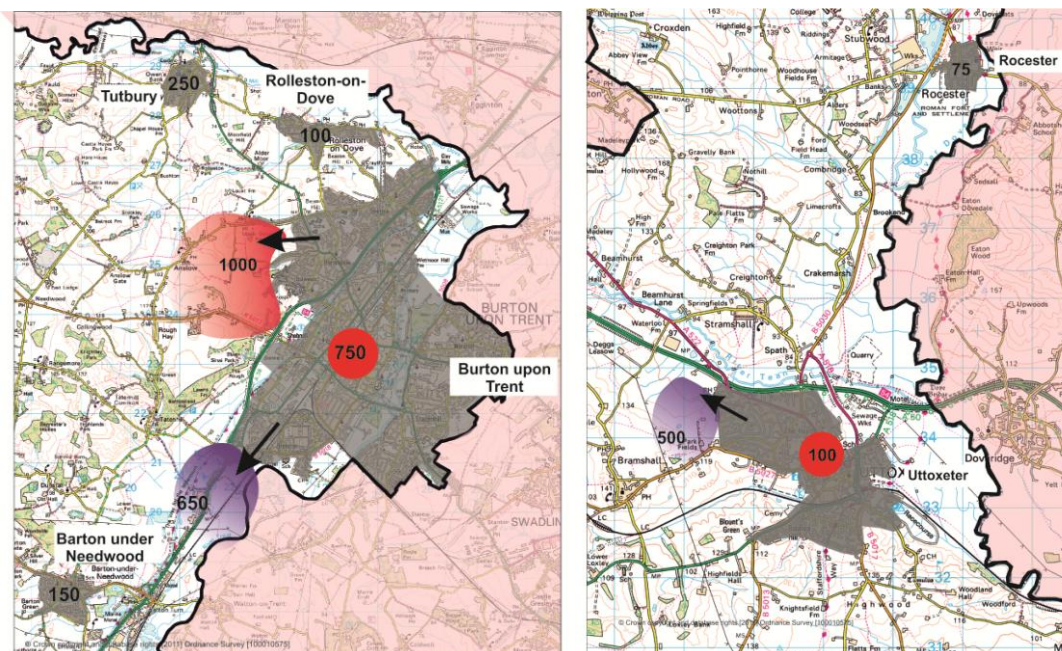




Figure 5.3: 2b concentrating most growth in the Outwoods and Stretton areas of Burton and some development in Uttoxeter and the strategic villages

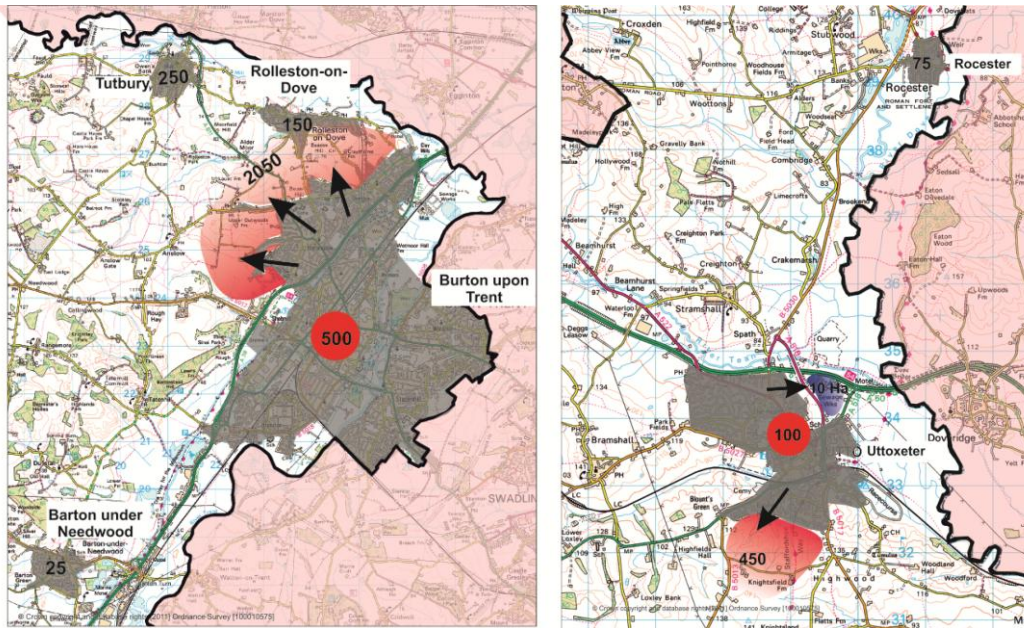


Figure 5.4: 2c more dispersed growth surrounding Burton and some development in Uttoxeter and the strategic villages

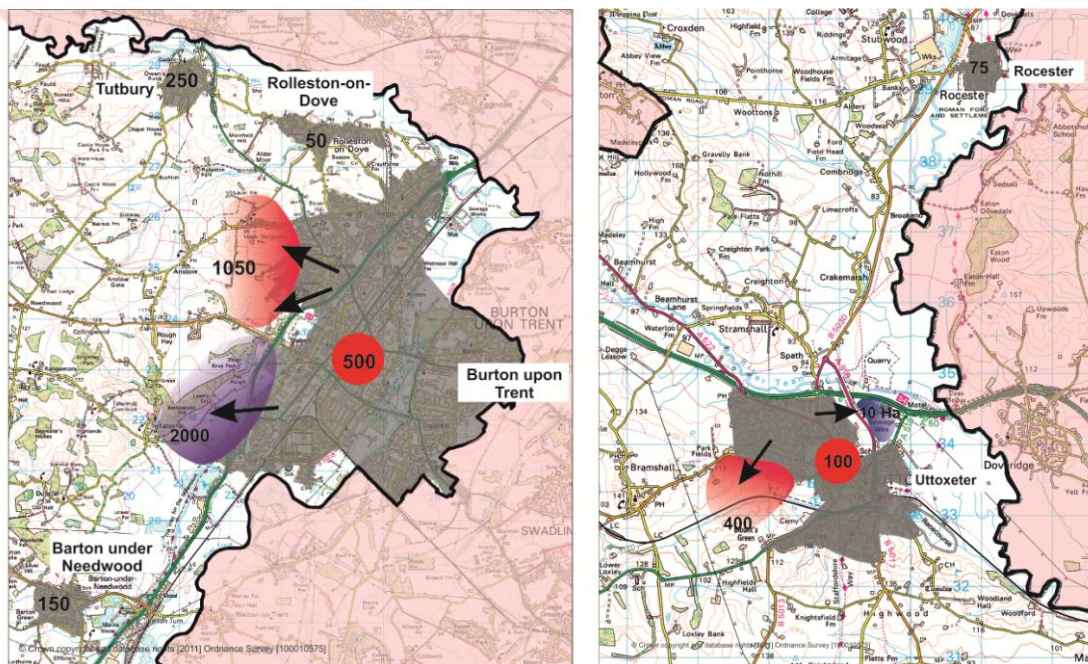
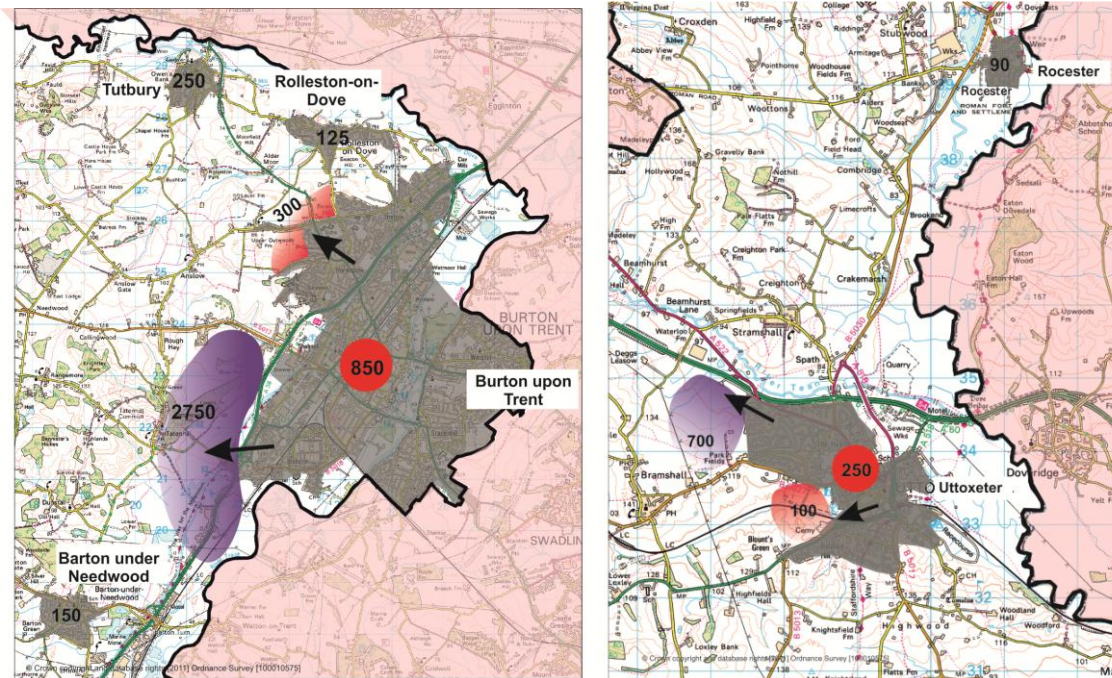




Figure 5.5: 2d concentrating growth in the South of Burton and some development in Uttoxeter and the strategic villages



5.85 The results of the sustainability appraisal of alternative options for the strategic locations are provided in the assessment matrix below, Table 5.6. The appraisal consists of a matrix testing the compatibility of each Strategic Option with each Sustainability Objective. The scoring criteria used are as follows:

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 or 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

Table 5.5: Appraisal of Strategic Options

Local Plan Options SA Objective	Option 2a		Option 2b		Option 2c		Option 2d		Strategic Villages	Commentary
	Burton	Uttoxeter	Burton	Uttoxeter	Burton	Uttoxeter	Burton	Uttoxeter		
Housing	✓	✓	✓	✓	✓✓	✓	✓✓	✓✓	✓	<ul style="list-style-type: none"> <li>All options have the opportunity to provide a suitable mix of decent and affordable housing. Higher scoring options deliver greenfield extensions which provide choice and flexibility and option 2d particularly also delivers more housing on brownfield sites which will address empty and unfit properties. Housing choice and flexibility will be delivered through the strategic villages but it is limited in some cases due to the size of the development. The villages also have fewer opportunities to deliver housing on brownfield sites.</li> </ul>
Economy	✓	✓✓	0	✓	✓✓	✓	✓✓	✓✓	✓	<ul style="list-style-type: none"> <li>All options will deliver employment land. Options scoring the highest are those where sustainable urban extensions will deliver a mix of uses where residential and employment opportunities can be coordinated. Strategic employment allocations are not made strategic villages however growth in these locations will support services and facilities which has the potential to employ local people.</li> </ul>
Transportation	-	✓	-	-	✓	-	✓✓	✓	✓	<ul style="list-style-type: none"> <li>Transportation issues vary across the options. Options scoring the highest are those where sustainable urban extensions will deliver a mix of uses, services and facilities thereby minimising adverse traffic impacts elsewhere. Option 2d scores very significantly due to the scale of development in the SW SUE. Option 2c Burton scores only one tick due to the western growth resulting in cross town traffic, poor access to the A38 and employment areas.</li> <li>Development on the western side of Burton, Options 2a and 2b include areas further away from local employment centres and less well connected to the existing transport network and the town centre. Options 2b and 2c in Uttoxeter don't deliver mixed use sites thereby increasing potential journeys to existing employment areas.</li> </ul>
Climate change, energy and air quality	-	-	-	-	-	-	-	-	-	<ul style="list-style-type: none"> <li>All options would contribute to the causes of climate change and appropriate mitigation to the causes and adaptation to the effects of climate change would be required.</li> </ul>
High quality design and sustainability	✓	✓✓	✓	✓	✓✓	✓	✓✓	✓✓	✓	<ul style="list-style-type: none"> <li>All of the options propose urban extensions, brownfield development and development within and/or surrounding the strategic villages. All options provide an opportunity to deliver high quality designed and sustainable buildings. Large sustainable urban extensions have more opportunities to deliver planned developments.</li> </ul>

Local Plan Options	Option 2a		Option 2b		Option 2c		Option 2d		Strategic Villages	Commentary
	Burton	Uttoxeter	Burton	Uttoxeter	Burton	Uttoxeter	Burton	Uttoxeter		
SA Objective										
Green Infrastructure and Open Space	✓	✓✓	✓	✓	✓✓	✓	✓✓	✓✓	✓	<ul style="list-style-type: none"> <li>All of the options propose urban extensions which provide opportunities for the incorporation of GI into proposals. The larger the development site/SUE the greater the opportunities to deliver on-site benefits through master planning. There is also potential through the development of SUE's to the south west of Burton and West of Uttoxeter to incorporate existing landscape features.</li> </ul>
Town centre	✓	✓	✓	✓	✓✓	✓	✓✓	✓	-	<ul style="list-style-type: none"> <li>All options would have a positive effect in sustaining the vitality and viability of the town centres because development is directed towards the urban areas.</li> <li>Whilst greenfield development is located on the periphery of all options, Options 2c and 2d in Burton score very positively because the development of the SW SUE has a well connected and direct road network to the town centre unlike locations to the west and north, although both options do contain some development in this location. Uttoxeter is a much smaller town therefore there is less to differentiate between options. Growth in the strategic villages does not contribute to the town centres.</li> </ul>
Rural Communities	✓	✓	-	✓	✓	✓	✓	✓	✓✓	<ul style="list-style-type: none"> <li>All options propose development in the strategic villages and hence have a likely positive impact on rural communities.</li> <li>Option 2b includes a substantial north western extension to Burton, extending outwards towards Rolleston-on-Dove and thereby likely to have an impact on the distinctiveness of this rural community.</li> </ul>
Flood risk	-	0	0	0	-	-	-	-	0	<ul style="list-style-type: none"> <li>Option 2a includes land south of Burton upon Trent that is largely within a flood zone 3 area.</li> <li>Options 2a and 2d propose development to the west of Uttoxeter, which is within a flood zone 1 area.</li> <li>Options 2c and 2d include land located in the south west of Burton which is significantly constrained by flood risk and would require appropriate mitigation to avoid increasing the risk of flooding.</li> <li>Whereas Option 2b steers development away from the flood plain in both Burton upon Trent and Uttoxeter.</li> </ul>
Use of land	✓	0	-	0	-	0	✓	✓	-	<ul style="list-style-type: none"> <li>Options scoring positively reflect the opportunities presented by brownfield development.</li> <li>Appropriate mitigation has the potential to mitigate likely negative impacts.</li> <li>Strategic allocations in villages will be greenfield.</li> <li>Uttoxeter scores 0 because due to the potential for urban renaissance but there is not much brownfield within the town to utilise with the</li> </ul>

Local Plan Options	Option 2a		Option 2b		Option 2c		Option 2d		Strategic Villages	Commentary
	Burton	Uttoxeter	Burton	Uttoxeter	Burton	Uttoxeter	Burton	Uttoxeter		
SA Objective										exception of Option 2d.
Natural Resources	✓	✓✓	✓	✓	✓✓	✓	✓✓	✓✓	0	<ul style="list-style-type: none"> <li>Large development sites have the potential to design sustainability into proposals and consider the prudent use of materials and resources.</li> </ul>
Quality of Life	✓	✓✓	✓	✓	✓✓	✓	✓✓	✓✓	✓	<ul style="list-style-type: none"> <li>All options provide a likelihood of positive impact with the provision of decent homes, additional services, improvements to green infrastructure and employment uses. In particular options with SUE's which propose larger mixed use developments in Burton-upon-Trent and Uttoxeter score highly.</li> <li>All options propose growth in rural areas thereby meeting local rural needs.</li> </ul>
Countryside and Landscape quality	-	-	--	-	-	-	-	-	-	<ul style="list-style-type: none"> <li>Option 2b includes extension of growth towards Rolleston-on-Dove. In combination the sites on the urban edge north west and west of Burton would impact on the boundary of the settlement and the open countryside, which buffers the village between the urban area.</li> </ul>
Biodiversity and Geodiversity	-	-	-	-	-	-	-	-	-	<ul style="list-style-type: none"> <li>The south western extension to Burton upon Trent included in options 2c and 2d includes a large site of biological interest, which would require appropriate mitigation to avoid a significant negative impact on biodiversity.</li> <li>The south western extension to Uttoxeter illustrated in option 2c includes a number of Biodiversity Action Plan points around the River.</li> </ul>
Water Quality	0	0	0	0	0	0	0	0	0	<ul style="list-style-type: none"> <li>All options include large scale development that would require additional water supply, thereby placing pressure on water quality related infrastructure. However this is regulated within the water industry to comply with relevant legislation.</li> </ul>
Historic Environment and Heritage Assets	-	-	-	-	-	-	-	-	-	<ul style="list-style-type: none"> <li>A number of options include areas identified as archaeological sites within the local Historic Environmental Record. A site specific heritage assessment would be require to determine the nature of potential heritage assets and recommend appropriate mitigation measures to avoid an adverse negative impact.</li> </ul>



The conclusion of the appraisal of each strategic option, taken from the Interim SA Report is below:

### **Strategic Option 2a: Concentrating growth on two sites in Burton and some growth in Uttoxeter and the strategic villages**

**5.86** In Burton development is focused on two sites, one to the west of the town and the other smaller site to the south of the town. In Uttoxeter development is focused on a mixed use site to the west of the town. In total the strategic villages are allocated 575 houses, with an additional 400 allocated to other villages.

**5.87** This option proposes residential development to the west of the town, and a mixed use site to the south of the town. Therefore this option provides significant benefits in relation to housing and employment mix and choice in the Borough. However, sites to the west of Burton are less well connected in terms of transport links and accessibility and therefore may cause adverse traffic impacts. These sites are also further away from local employment centres. The development in Burton would have significant positive effects in relation to the town centre, rural communities, and use of land.

**5.88** This option proposes 750 houses on brownfield land in Burton town centre and therefore would have a positive effect in sustaining the vitality and viability of the town centre, and represents one of the most efficient uses of land of all the options. Whilst the west of Burton is not in Flood Zones 2 and 3, the mixed use site to the south of Burton would be within both Flood Zones 2 and 3, therefore appropriate mitigation would be required to avoid increasing the risk of flooding elsewhere.

**5.89** In Uttoxeter, development is focused on a mixed use site to the West of the town, with some brownfield development in the town centre. A sustainable urban extension to the west of Uttoxeter would bring a range of benefits in relation to housing mix, quality of life, transport links, green infrastructure and economy.

**5.90** Spreading development to the west and south of Burton town would mean any positive and negative impacts would be distributed across the town, and not concentrated in one area. However, this reduces the potential for cumulative impacts and economies of scale that could be achieved through bringing forward large sustainable urban extensions. The Sustainable Urban Extension in Uttoxeter would bring significant benefits however, focusing development in Uttoxeter on one site means that there is lack of choice and over-reliance on this site to bring housing forward. Therefore this option would not achieve the plans objectives and is not being carried forward.

## **Strategic Option 2b: Concentrating most growth in the Outwoods and Stretton areas of Burton and some development in Uttoxeter and the strategic villages**

**5.91** In Burton development is focused around the north and west of the town. In Uttoxeter development is focused to the south of the town. In total the strategic villages are allocated 500 houses, with an additional 200 allocated to other villages.

**5.92** The sites in this option are purely residential, with employment being provided on brownfield sites in Burton and a 10 hectare Greenfield employment site to the west of Uttoxeter. In Burton this places increasing pressure on brownfield sites to deliver employment development and could result in lack of choice and flexibility in employment sites in the town.

**5.93** Focusing development to the north and west of Burton would exacerbate traffic problems in these areas and would require significant investment in transport infrastructure. In addition as none of the sites are mixed use this would increase the need to travel to employment opportunities and other services and facilities. There is a lack of significant GI assets and corridors to the north and west of Burton, and while new development would provide new GI assets, there is limited opportunity to link with and enhance existing assets. This area is however outside of Flood Zones 2 and 3, and therefore is not increasing development in the flood plain.

**5.94** In Uttoxeter residential development is focused to the south of the town, and employment in a 10 ha site to the north west of the town. The residential development would bring a suitable mix of type and tenure of housing to Uttoxeter, however this is likely to have negative effects in terms of transportation as the site is less well connected to the town centre and employment sites. Overall, the site would not bring the benefits that a mixed use sustainable urban extension would bring. Providing employment to the West of the town would link to the existing employment sites and hence provide economies of scale.

**5.95** This option includes extension of growth from Burton towards Rolleston-on-Dove, which would impact on the boundary of the settlement and the open countryside which buffers the village between the urban area. This increases the risk of coalescence between the village and the town and would have an impact on landscape character and the distinctiveness of this rural community.

**5.96** Overall, spreading residential development to the north and north west of Burton would be less well connected to employment, services and facilities of the

town, and hence would be likely to lead to increased traffic congestion problems and reduced air quality. These sites would not achieve the benefits of a mixed use development and therefore would not be as sustainable. This is also the case for a purely residential site to the south of Uttoxeter. This area is again less well connected to the town centre and employment sites and hence is less sustainable. Therefore this option would not achieve the plans objectives and is not being carried forward.

### **Strategic Option 2c: More dispersed growth surrounding Burton-upon-Trent and some development in Uttoxeter and the strategic villages**

**5.97** This option proposes a large scale mixed use urban extension to the south west of Burton as well as a significant amount of residential development to the west of Burton. In Uttoxeter residential development is proposed to the south west of the town with a 10 hectare employment site to the north-east.

**5.98** For Burton this option would provide a suitable mix of type and tenure of housing in broadly sustainable locations. The mixed use site to the south west of Burton represents a sustainable urban extension (SUE), providing employment land with direct access to the A38 as well as a range of services and facilities. This site would be well connected and would provide additional public transport linkages. The development of a major mixed use extension would bring opportunities to further enhance accessibility and connectivity with the town, with the potential to increase the positive impact on the transportation objective. In addition, an SUE in this location provides the opportunity to link with and enhance current green infrastructure as well as providing GI on site.

**5.99** Spreading development across the two areas in Burton would however, reduce the benefits provided by the mixed use site as it may not deliver enough housing to be able to deliver sufficient additional facilities and services.

**5.100** Residential development in Uttoxeter would be focused around the south west of the town. This is a broadly sustainable location as it is close to the town centre and within walking distance of a number of services and facilities. This would have a significant positive effect on the vitality and viability of the town centre. However there are flood risk issues to the south of the site due to Picknall Brook running along the southern boundary. In addition the railway line runs along the southern boundary as well. The site would not bring the benefits that a mixed use sustainable urban extension would bring. Providing employment to the West of the town would link to the existing employment sites and hence provide economies of scale.

**5.101** Overall this option for Burton represents a broadly sustainable option, with a large SUE to the south of the town, and further residential development to the west. This would provide a broad mix of housing and new employment land, as well as new services and facilities including schools and a local centre. However, development is spread across the town and by providing just 2000 houses in the SUE this may mean that not enough additional benefits are provided in this area. Therefore, this option does not provide the most benefits and is not the most sustainable option.

**5.102** Overall for Uttoxeter, this option is not the most sustainable as residential development is split from employment land and sites. While the land is located close to the town centre, the site is not of a sufficient size to deliver any additional services and facilities and the land is affected by flood risk and landscape character issues. Therefore, this option does not provide the most benefits and is not the most sustainable option.

### **Strategic Option 2d: Concentrating growth in the south of Burton-upon-Trent with development to the west of Uttoxeter and the strategic villages**

**5.103** The option includes a major mixed use extension to the South West of Burton-upon Trent with some residential development to the north west of the town, and additional development in the town centre. With comparison to the previous option (option 2c), the option proposes an increased amount of growth to Uttoxeter and includes land to the west of the town, for a mixed use extension, as well as a smaller residential area to the south.

**5.104** For Burton this option would provide a suitable mix of type and tenure of housing in broadly sustainable locations. The mixed use site to the south west of Burton represents a sustainable urban extension (SUE), providing employment land with direct access to the A38 as well as a range of services and facilities. This site would be well connected and would provide additional public transport linkages. The development of a major mixed use extension would bring opportunities to further enhance accessibility and connectivity with the town, with the potential to increase the positive impact on the transportation objective.

**5.105** In addition, an SUE in this location provides the opportunity to link with and enhance current green infrastructure as well as providing GI on site. Compared to Option 2c, providing additional residential development in the urban extension enhances the sustainability of the site as it would be more viable to deliver services and facilities on site. The addition of allocating a small residential site to the north west of the Borough, and more housing on brownfield sites in the town

centre allows for flexibility in terms of deliverability and means providing a wider housing choice for current and future residents.

**5.106** In Uttoxeter development is focused on a mixed use site to the West of the town, and a small Greenfield site in the south west, with some additional brownfield development in the town centre. A sustainable urban extension to the west of Uttoxeter would bring a range of benefits in relation to housing choice, quality of life, transport links, green infrastructure and economy. Providing additional residential development close to the town centre, and on brownfield sites provides a wider housing choice for current and future residents, and allows for flexibility in deliverability.

**5.107** This option represents the most sustainable option by providing large sustainable mixed-use urban extensions in both Burton and Uttoxeter, which as well as providing a broad range of housing type and mix, would also provide additional services and facilities for the towns, and more employment land. In addition, this option proposes more development on brownfield sites in the towns which would increase the vitality and viability of the town centres. As well as SUEs, the allocation of small sites in both towns would allow for flexibility in terms of choice of housing and deliverability of housing sites. Therefore, this is the most sustainable option as it provides a more balanced approach to growth, and achieves the plan objectives and therefore it is the preferred option.

### **Summary of Strategic Options 2a – 2d**

**5.108** The four Strategic Options are based on broad locations for development and are focused on Burton upon Trent and Uttoxeter as the two principal towns in the Borough.

**5.109** The assessment of these options is based upon a high level assessment of broad locations and not on the assessment of specific sites; therefore individual sites may perform more favourably than the area as a whole.

**5.110** The performance of the four different options is mixed in relation to a number of criteria. Specifically the larger the quantum of development in one place, the better performing the broad location of growth is. This is because larger sustainable urban extensions are capable of delivering communities that can deliver services and facilities necessary to support them. For example a larger site has the potential to deliver green infrastructure, a community hub with basic daily amenities and also a well designed site, all of which contributes to the quality of life of new residents. Whilst larger new communities also have the potential to impact upon existing communities and the environment, a larger

quantum of development has the potential to mitigate impacts including highway improvements, drainage and flood risk.

**Overall taking into account the sustainability appraisal, Option 2d was taken forward as the Preferred Option**

## Task B4: Evaluating the effects of the Preferred Strategic Option, Strategic Sites and Policies for Delivery; and Task B5: Considering ways of mitigating adverse effects and maximising beneficial effects.

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**5.111** This section evaluates the potential significance of effects of the Local Plan Preferred Strategic Option, Strategic Sites and policies for delivery as set out in the Interim SA Report.

### **Summary of the Preferred Strategic Option**

**5.112** The Preferred Strategic Option is Option 2d. This Option represents the most sustainable approach to growth by providing large mixed use urban extensions in both Burton and Uttoxeter, which as well as providing a broad range of housing type and mix, would also provide additional services and facilities for the towns, and more employment land.

**5.113** In addition, this Strategic Option proposes more development on brownfield sites in the towns which would increase the vitality and viability of the town centres. As well as Sustainable Urban Extensions, the allocation of small sites in both towns would allow for flexibility in terms of choice of housing and deliverability of housing sites. Development is also directed to the re-use of brownfield sites in the urban areas. In the rural areas growth is directed to strategic villages to allow for these settlements to grow and meet its own needs and those of the surrounding hinterland, by supporting rural services.

**5.114** Therefore, this is the most sustainable Strategic Option as it provides a more balanced approach to growth, and achieves the plan objectives.

**5.115** It is recognised that Strategic Option 2d delivers significant positive effects on the Borough but also has some significant negative effects. A number of significant negative effects associated with Strategic Option 2d are summarised in Table 6.1 with a commentary on the mitigation necessary through the delivery



of the Strategic Option, Strategic Sites and policy framework provided. It is accepted that negative effects in the form of loss of countryside cannot be reversed but that the policy framework can reduce the impact.

**Table 5.6: Significant negative effects associated with the Council's Preferred Strategic Option**

	Burton	Uttoxeter	Strategic Villages	Commentary	Mitigation/Policy approach
<b>Climate change, energy and air quality</b>	-	-	-	Option 2d will contribute to the causes of climate change due development creating additional energy use and travel within the Borough.	Policies will provide a framework that seeks appropriate mitigation to the causes and adaptation to the effects of climate change. The spatial strategy delivers allocations that co-locate uses to minimise the need to travel. Transport policies will need to promote the use of alternative modes to the car. Green Infrastructure, National Forest and biodiversity policies will need to protect, conserve, enhance, and create habitats to offset climate change.
<b>Town centre</b>	✓✓	✓	-	Growth in the strategic villages does not contribute to town centre vitality and viability.	Policies will ensure that village growth contributes to village life, which was an important principle underpinning the selection of Spatial Option 2 initially. If village growth did contribute more fully to town centre vitality and viability there would be a corresponding increase in car traffic resulting in significant negative impacts. The amount of development directed to villages is small in comparison to that directed to towns and the appraisal of the Option brings about very significant positive effects upon Burton and positive effects in relation to Uttoxeter.
<b>Flood Risk</b>	-	-	<b>0</b>	This Option proposes development to the west of Uttoxeter, which is within flood zone 1. Development is also directed to	The Local Plan will have specific policies which deal with water management and flooding for example encouraging the use of Sustainable Urban Drainage schemes and grey water recycling. The provision of Green Infrastructure and National Forest planting will act as natural soakaways and reduce the potential impact of surface water run-off and will be encouraged in policies.

	Burton	Uttoxeter	Strategic Villages	Commentary	Mitigation/Policy approach
				the South/South West of Burton which is significantly constrained by flood risk.	
<b>Use of Land</b>	✓	✓	-	Strategic allocations in villages will be greenfield due to the lack of brownfield site opportunities.	Green Infrastructure policies will have the potential to enhance greenfield sites and introduce habitat creation and amenity space to underpin health and well being. Village development is important to support village life, services and facilities. The majority of growth is directed to the urban areas.
<b>Countryside and Landscape</b>	-	-	-	This option will lead to the loss of countryside and consequently have an impact on landscape.	Greenfield sites are necessary to deliver growth in the Borough due to the lack of brownfield sites. Loss of the countryside is therefore inevitable and irreversible. Policies will mitigate the impact through good design and location of development.
<b>Biodiversity and Geodiversity</b>	-	-	-	Greenfield development has the potential to impact upon biodiversity and geodiversity.	There are no European or national designations in proximity to the proposed development sites in this Option. Policies will provide a framework that seeks to protect, conserve and enhance habitats and species. The provision of Green Infrastructure and in particular National Forest planting will create habitats.
<b>Historic Environment and Heritage Assets</b>	-	-	-	Development sites have the potential to contain historic assets.	Policies will ensure that listed buildings, conservation areas and other heritage assets have appropriate protection.

## **Sustainability Appraisal of Strategic Sites**

**5.116** Having decided on the broad distribution of development, the next step was to decide what sites should be allocated in the Local Plan. The Preferred Strategic Option will be delivered through a range of strategic sites suitable for development. The Local Plan would not allocate every potential development site, only ones which are fundamental to the delivery of the Local Plan. A Strategic site threshold of 100 units was established as it was felt that this threshold was low enough to include sites on brownfield land and in the rural areas. Smaller sites that fall below the strategic sites threshold will be delivered as windfalls and where appropriate neighbourhood plans will allocate sites, subject to their own sustainability appraisal.

**5.117** Following the screening process, outlined in the methodology, 27 sites were considered to be suitable to undertake a sustainability appraisal. The full assessment and analysis of the sites can be found in Appendix G, but a summary of the assessment.

**5.118** It is important to note that the results and recommendations of the assessment are not based on a mathematical analysis of the assessment e.g. by adding up the number of ticks versus the number of crosses.

## Summary of the appraisal of Strategic Site taken from the Interim SA Report

### The Strategic Sites: Burton upon Trent

#### Branston Depot

**5.119** Branston Depot is a brownfield site located within the Burton urban area. It is a large site with the potential to deliver a mixed community with some on site facilities which can deliver daily needs. The site scores positively in terms of housing, transport, use of land and access to local services. It also scores positively in terms of countryside and landscape quality because the redevelopment of the site would improve the existing townscape through the removal of employment land, inclusion of green spaces and provision of links with adjacent residential areas which will improve permeability for the existing community. However, development of this site would lead to loss of some employment land, but there is the potential for the tenant to relocate within the Borough. In addition, there is a Grade II listed, office block, canteen and pump house on site, which whilst this has been classed as a negative impact, redevelopment actually provides the opportunity to restore these premises and reverse the current pattern of disrepair. The office block is considered to be the most architecturally elaborate complex built under the National Factories scheme.

#### Pirelli, Beech Lane, Burton

**5.120** Pirelli is a brownfield site located within the Burton urban area. This former manufacturing site, offers the potential to deliver up to 300 houses on a mixed use development scheme comprising residential, Class B1, B2 and B8 industrial units, hotel, public house and restaurant. This site offers significant benefits in terms of housing, economic opportunities, transportation due to its location on a transport corridor, use of land, countryside and landscape quality, access to services, local distinctiveness and existing settlements. The development of this site will lead to the positive development of unutilised land and the 'rebirth' of the canal corridor which is considered to be a key feature of the town's heritage. The site scores negatively due to its location within Flood Zone 2 and 3a/b. A site specific flood risk assessment and a sequential test have been undertaken to direct residential development to least vulnerable areas.

#### Belvedere Social Club, Burton on Trent

**5.121** Belvedere Social Club is a brownfield site located in the Burton urban area. The site is located on a transport route into the town centre and in close proximity



to a major employer, Queens Hospital. The site is smaller than the other brownfield sites assessed which provides fewer opportunities to deliver a mix of housing and it is unclear if the delivery of this site would provide a positive or negative impact on the surrounding neighbourhoods because it would result in the loss of some green space.

## **Bargates**

**5.122** Bargates is a brownfield site located centrally within the Burton urban area and on the edge of the town centre. It's a small 100 unit site which due to its location in a prominent gateway position has the potential to improve the character, townscape and local distinctiveness of the area and the town. Flood risk is an issue due to the proximity of the Washlands however the flood defences along the Meadowside car park have been improved and reinforced. There is also a question mark in relation to the historic assets. Development has the potential to have a significantly positive impact on the location providing development is both sensitive and sympathetic to ensure that historic assets are enhanced. There is potential for the development of this site to impact upon the Air Quality Management Area which extends along Horninglow Street to the Derby Turn roundabout but it will depend on the format of the development that comes forward. The transport objective scores positive as the site is in a sustainable location but with uncertainty because the impact of air quality is not only unknown but also in part mitigated by the ability to reach the site by non-vehicular modes of transport.

## **Land North of Stretton, Burton upon Trent**

**5.123** This is a greenfield site located on the edge of Burton urban area. It has the potential to deliver a mix of house types and is located close to Burton's existing employment areas. However, whilst the site is within walking distance to some local services the town centre is only accessible by bus. It is likely that the location will increase the volume of cross-town traffic and is likely to cause congestion on the minor local roads. Development at this location would also significantly encroach on the open countryside which divides Burton and Rolleston on Dove, the impact of which would be difficult to mitigate. There are also a number of environmental and historic features in close proximity to the site.

## **Land at Bitham Lane, Stretton**

**5.124** This is a greenfield site located on the edge of Burton urban area. It has the potential to deliver a mix of house types and is located close to Burton's existing employment areas. However, whilst the site is within walking distance to

some local services, the town centre is only accessible by bus. It is likely that the location will increase the volume of cross-town traffic and is likely to cause congestion on the minor local roads without suitable mitigation in place. Development at this location would also significantly encroach on the open countryside which divides Burton and Rolleston on Dove, the impact of which would be difficult to mitigate. There are also a number of historic features in close proximity to the site which will need consideration but which are unlikely to be a significant barrier to development.

### **Land North of Harehedge Lane, Burton**

**5.125** Harehedge Lane is greenfield site located on the edge of Burton upon Trent. The site has the potential to deliver a mix of house types and is located close to Burton's existing employment areas. The site is within walking distance to some local services but not to the town centres. Education facilities are well catered for within the area and the site itself has already received permission for a primary school. This greenfield site scores positively in terms of local distinctiveness and there is no impact in relation to countryside and landscape character because the site is contained by residential development on three sides, and sits within the topography providing an opportunity for the development to contribute to the existing sense of place.

### **Land South of Beamhill Road, Burton**

**5.126** Land south of Beamhill is a greenfield site located on the edge of Burton. It is a large site which would be capable of delivering a mix of housing and local facilities to support the new population. The sites location close to the A511 provides it with good access and the site would be well served by public transport. There would be a significant negative impact on the Countryside and landscape quality owing to the size of the development site and its elevated position within the landscape. Whilst the site is bounded around almost three sides this existing urban form does not translate well in terms of containment for the site due to a rural and open countryside characteristic.

### **Redhouse Farm**

**5.127** Redhouse Farm is a greenfield site located on the edge of the Burton urban area. It has the potential to deliver a mix of housing and is located close to existing employment including a major Burton employer, Queens Hospital. Local services are within easy reach of this site however the site is likely to increase cross-town traffic due to poor access and the lack of a direct route. The topography of the site results in a significant negative impact on countryside and

landscape owing to the visual impact across parts of Burton. There are potential environmental and historical constraints which would have sustainability effects.

#### **Land at Henhurst Hill, Burton**

**5.128** This is a greenfield site located on the edge of the Burton urban area. This large site has the potential to bring forward a housing mix and is in close proximity to Centrum 100 and the employment opportunities that it offers. However the peripheral location of the site within a rural location will place pressure on the local road network. This site has a very negative impact on countryside and landscape due to the sensitive topography and prominent hillsides including Shobnall Dingle, Sandyford Dingle and areas of parkland and woodland. The large size of the site and its location in a rural area would result the potential negative impact in relation to local distinctiveness.

#### **Land West of the A38 (Lawns Farm)**

**5.129** This is a large mixed use development site comprising housing and employment. The size of the site provides opportunities to deliver a range and mix of house and employment types. The capacity of this site has the potential to create a sustainable community which will provide services and facilities to meet the needs of the new population. The site is accessible to the Strategic Road Network and the Wellington Road transport corridor into Burton giving direct access to the town centre. The delivery of a community will provide opportunities to deliver a well designed and distinctive development. Given its location there is opportunity to be original in this location. There is partial location within flood zones and there is unknown potential for environmental and historic assets. The Trent and Mersey canal run through the site which is a designated Conservation Area.

#### **Land South of Main Street Branston**

**5.130** This is a large greenfield site on the edge of Burton which can bring forward a range and mix of house types. The site also provides employment land and the site is in close proximity to existing employment areas such as Centrum 100. Local services could be provided to meet local needs. The site has good access to the Strategic Road Network, local services, out of town retail and the town centre by public transport. The site has the potential to link in with the existing built form and character of Branston. The site is located within Flood Zone 2 which will require mitigation.

## The Strategic Sites: Uttoxeter

### JCB Sites

**5.131** The JCB site is a brownfield mixed use site located centrally within Uttoxeter. The site will deliver housing, employment, retail, community facilities and a town park. Its central location results in the site scoring positively in terms of transport and access to services. The site will contribute to the regeneration of the town by bringing back into use a derelict site and improving the townscape of the current area. In doing so there is an opportunity to deliver a well designed and distinctive development. There is an unknown impact on the historic environment due to the proximity of the Conservation Area and various listed buildings.

### Land West of Uttoxeter (Parks Fm)

**5.132** This site represents a large greenfield site on the western urban edge of Uttoxeter. The site has the potential to deliver both housing and employment uses and would be required to deliver services and facilities to meet the local needs of the new community. The site is contained within the landscape and has the potential for a high quality development that provides a natural infill between existing residential areas to the east of the site and the employment areas to the north. Access to the Strategic Road Network and from there to the town centre is good. There is an unknown impact on biodiversity owing to the proximity of two BAP sites recording Lapwings and the Brown Hare. There is also a stand of Japanese knotweed.

### Land off Bramshall Road, Uttoxeter

**5.133** Land off Bramshall Road is a greenfield site on the western urban edge of Uttoxeter and within walking/public transport distance to the town centre. The site represents a small scale extension which is buffered from the existing urban edge.

### Land at Hazelwalls Farm, (off B5013), Uttoxeter

**5.134** This is a large greenfield site located on the southern urban edge of Uttoxeter capable of delivering a mix of housing types. There are concerns over the capacity of the local road network in accommodating proposals. There is an impact on the countryside due to the large size of the site and the way in which it extends into the countryside. The prominent position that the site occupies is

likely to detract from the sense of place in this part of Uttoxeter. There is a significant impact on biodiversity due to a number of habitats and species on the site. There is an unknown impact on historic assets.

#### **Land South of Bramshall Road, including Ryecroft Farm, Uttoxeter**

**5.135** This is a large greenfield site south of Bramshall Road and north of the railway line. The site has the potential to deliver a mix of housing types and is also within close proximity to employment opportunities available within Uttoxeter including the town centre and its facilities and services. The site scores negatively in relation to flood risk as part of the site falls within Flood Zones 2 and 3. A negative impact is also recorded in relation to the countryside due to the extent the development site extends into the countryside and the rural feel of the surrounding character. It is unknown if there would be any biodiversity or historic environment impacts.

#### **Land south of Wood Lane, Uttoxeter**

**5.136** This is a greenfield site capable of delivering residential development, however it is small in scale and so has less opportunity to deliver a mix of housing types. The site is accessible to the town's employment areas and is within walking distance to the town centre. There are negative impacts in relation to the countryside because although the site is well contained within the existing built urban area with residential development on three sides, it is in a very distinct character area, with large detached houses on large plots which has the potential to impact upon the existing built form.

#### **Land West of Dove Way, Uttoxeter**

**5.137** This is a small site capable of delivering housing but it wouldn't have the opportunity to deliver a huge amount of housing mix and type. The site is close to existing employment areas and the location of the site is sustainable with residents able to walk to the town centre and other services and facilities. The site has a negative impact because it is situated within Flood Zones 2 and 3. It is unknown if there is an impact on the historic environment.

#### **Land at Stone Road, Uttoxeter**

**5.138** This is a small greenfield site close to the centre of Uttoxeter. Opportunities for delivering housing mix and type are more limited however the proximity of the site to employment opportunities and the town centre services and facilities is very good. The site fits in with the existing settlement pattern and has the potential to integrate with surrounding facilities.

### **Dove Way, Uttoxeter, employment**

**5.139** This site is considered as a greenfield employment only site. It is located close to existing facilities and services, the town centre and housing. The location of the site between two roads reduces the potential impact of this site on the landscape and countryside. It is unlikely that development on this site can create a distinctive sense of place because the area currently has little distinctiveness.

## **The Strategic Sites: Strategic Villages**

### **Land at Belmot Road, Tutbury**

**5.140** This site is greenfield and located on the edge of existing residential development. The development provides housing of a suitable scale and mix in a rural village which offers a range of facilities. The village centre with its range of services, facilities and employment opportunities is within walking distance. The railway station at Hatton is located 1 mile from Tutbury with regular services to Stoke on Trent and Derby. There is potential for this site to sit within the landscape and to address the distinctive character of the village. The impact upon biodiversity is unknown, in particular the potential impact on BAP species present which includes Barn Owls.

### **Land South West of Tutbury**

**5.141** This site is greenfield and located on the edge of existing residential development. The development seeks to diversify the housing offer within Tutbury with a range of sizes and tenures, including bungalows suitable for the elderly, affordable housing and self build. Employment forms part of proposals. The village centre with its range of services, facilities and employment opportunities is within walking distance. The railway station at Hatton is located 1 mile from Tutbury with regular services to Stoke on Trent and Derby. There is potential for this site to sit within the landscape and to address the distinctive character of the village.

### **Land to the North West of the Green, Barton under Needwood**

**5.142** Located off The Green, this is a greenfield site bounded on two sides by existing residential development. There is potential to deliver infill development which builds upon the character of the surroundings. The site scores negatively because the location of the site will result in traffic crossing the village which already experiences congestion at certain times, and access to the site which is a



minor road and rural in character could result in traffic congestion. The village centre and its services and facilities can be walked to.

#### **Land at Efflinch Lane, Barton under Needwood**

**5.143** A greenfield site located on the edge of the village, there is potential to deliver a mix of housing types and tenures. The site is within walking distance to services and facilities including the village centre. The site scores positively due to the significant levels of open space provided on site which will support biodiversity, and contribute to the character and local distinctiveness of the development. In particular the planting and mounding associated with screening the A38 will have a positive impact on the village as a whole. The impact on historic assets as the site is adjacent to the conservation areas along the canal and in close proximity to Mill Bridge which is a listed building is unknown.

#### **Barton Park Farm, Barton under Needwood**

**5.144** This is a greenfield site located on the western residential edge of Barton under Needwood. The site has the potential to deliver a range and mix of housing types and tenures. The site is accessible to services and facilities within the village including the village centre. The site is contained within the landscape and there is potential to deliver a distinctive place particularly using the features such as the water course and public right of way. There is potential for a negative impact in relation to transport due to the minor road that would access the site and also because of the congestion in the village at certain times. The site is also within Flood Zone 2. There is an unknown impact on the historic environment.

#### **Sports Field, Rolleston**

**5.145** Representing a greenfield site on the southern edge of the village the site is capable for delivering a mix of housing types. The village is located just beyond the Burton upon Trent urban area which provides opportunities for villages to access employment opportunities, services and facilities in Burton town centre, by bus, as well as those in the village itself. Burton opportunities however are not on the doorstep unlike those in the village. There is considered to be no impact on the countryside owing to the enclosure experienced by the site due to existing residential development to the north and east, existing trees and the flatness of the topography.

Following the completion of the Interim SA, consultation on the document alongside the Preferred Options document, submitted planning applications and the suggestion of alternative sites, the following sites were taken forward into the final spatial strategy:

- Land south of Branston, Burton-upon-Trent\*
- Lawns Farm, Burton-upon-Trent\*
- Land north of Harehedge Lane, Burton-upon-Trent\*
- Land south of Beamhill, Burton-upon-Trent\*
- Land at Guinevere, Stretton, Burton-upon-Trent\*
- Land at Efflinch Lane, Barton Under Needwood\*
- Branston Depot, Burton-upon-Trent\*
- Bargates, Burton-upon-Trent
- Middle Yard, Burton, Burton-upon-Trent
- Molson Coors, High Street, Burton-upon-Trent
- Derby Road, Burton-upon-Trent
- Land west of Uttoxeter\*
- Stone Road, Uttoxeter
- Hazelwalls, Uttoxeter
- Brookside Industrial Estate, Uttoxeter
- JCB sites, Uttoxeter\*
- Dove Way employment site, Uttoxeter
- College Fields, Rolleston\*
- Land south of Rocester\*

\* Indicates site subject to planning applications

## Sustainability Appraisal of Policies

**5.136** The Sustainability Appraisal of the Strategic and Detailed Policies contained in the Preferred Options document concluded the following:

### Place Shaping Policies

#### *Summary of Assessment/Significant Effects*

**5.137** The place shaping policies 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 place shaping 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. 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***

**5.138** 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.

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

**5.139** The delivery of development is offset by policies which seek to mitigate impacts. In particular Policy SP3 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 SP6 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.

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

**5.140** 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 potential for negative impact.

#### ***Prosperity Policies***

**5.141** The prosperity policies 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 town centre policies in particular seek to deliver

growth and opportunities that support a growing population and which will reduce travel to other nearby shopping centres, which in the case of Burton includes Derby or Lichfield. Uttoxeter however needs to diversify its town centre to provide a cross section of town centre activities to support a more rural hinterland.

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

**5.142** 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 to attract inward investment, the regeneration of town centres and the diversification of the Borough's employment base will be beneficial by increasing people's quality of life.

#### *Summary of mitigation measures*

**5.143** 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. Such development is also encouraged in rural areas to support the limited amount of development assigned to it, particularly in the strategic villages. Taken as a whole this suite of prosperity policies seeks to deliver growth whilst respecting and protecting the environment.

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

**5.144** 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.

#### *Protection and Enhancement of the Environment Policies*

**5.145** 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, Green Belt and Special Areas of Conservation.

**5.146** 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 environmental protection and enhancement is contained within the policies anyway.

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

**5.147** 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***

**5.148** 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***

**5.149** 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***

**5.150** 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 and advertisements. Very specific issues are covered that relate to particular development pressures within the Borough including the sub-division and multiple occupation of dwellings and the change of use/extension of residential institutions.

**5.151** 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***

**5.152** 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***

**5.153** 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***

**5.154** None identified.



## Chapter 6

### Stage B: Testing Revised Plan Objectives (Task B1), Assessing potential effects of additional the Strategic Options (Task B3), Evaluating the potential significance of effects of the Pre-Submission Local Plan Spatial Strategy, Strategic sites and policies (Task B4) – (SA Report)

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**6.1** This section includes the sustainability appraisal of the revised plan objectives, spatial strategy, strategic sites and detailed policies. Where there are differences between those set out in the Preferred Options document, these will be highlighted in the appraisal.

#### Reasonable Alternatives

**6.2** As a result of the consultation on the Preferred Options and Interim SA Report the following additional options are appraised below:

#### Growth Scenarios

**6.3** As set out in the evidence base report, the Strategic Housing Market Assessment, there are four possible growth scenarios for the Borough. These are:

- Scenario 1a: Re-based SNPP 2010 – 2008-based changes in Headship
- Scenario 1b: Rebased SNPP 2010 - Fixed Headship
- Scenario 2a: Employment-led (ELR) – 2008-based changes in Headship
- Scenario 2b: Employment-led (ELR)- Fixed Headship

These growth scenarios will lead to the following housing figures:

- Scenario 1a = 11,935 (average 601 dwellings per year)
- Scenario 1b = 11,369 (average 571 dwellings per year)
- Scenario 2a = 12,500 (average 630 dwellings per year)

- Scenario 2b = 11,844 (average 596 dwellings per year)

6.4 The appraisal for each option is set out in table 6.2, with the criteria for the appraisal set out below:

**Table 6.1: Options appraisal key**

Symbol	Likely effect on the SA Objective
✓✓	The option is likely to have a <b>very positive</b> impact
✓	The option is likely to have a <b>positive</b> impact
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
--	The option is likely to have a <b>very negative</b> impact
~	No clear link

**Table 6.2: Appraisal of 4 growth scenarios**

	Growth Scenario Option	1a	1b	2a	2b	Comments
1	Housing	✓✓	✓	✓✓	✓✓	Overall Options 2a and 2b will address the existing and future housing needs of the Borough in light of employment needs
2	Economy	0	0	0	0	No option will lead to the creation of jobs but options 2a and 2b will be meet the housing needs of employees in the Borough who currently live elsewhere
3	Transportation	?	?	?	?	Depends on delivery of growth and associated infrastructure
4	Climate change, energy and air quality	-	-	-	-	Development of all scales without sufficient policies and infrastructure in place could have an impact on climate change without mitigation
5	High quality design and sustainability	?	?	?	?	Depends on implementation
6	Green Infrastructure and Open Space	0	0	0	0	Unlikely to have an impact on objective
7	Town centre	0	0	0	0	Unlikely to have an impact on objective

8	Rural Communities	0	0	0	0	Unlikely to have an impact on objective
9	Flood risk	0	✓	0	0	Unlikely to have an impact on objective
10	Use of land	-	-	-	-	All options would require greenfield development
11	Natural Resources	-	-	-	-	All options would have an impact on resource use
12	Quality of Life	✓	✓	✓	✓	Meeting housing needs would have a positive impact on residents quality of life
13	Countryside and Landscape quality	-	-	-	-	All options will have impacts on landscape without mitigation
14	Biodiversity and Geodiversity	?	?	?	?	Depends on implementation and location of growth
15	Water Quality	?	?	?	?	Depends on implementation
16	Historic Environment and Heritage Assets	?	?	?	?	Uncertain

**6.5** Overall the 4 scenarios for growth have similar impacts when appraised against the Sustainability Objectives. It is acknowledged that higher levels of growth could have increased negative impacts in terms of pressure on infrastructure and the environment. However, due to the preferred development strategy and distribution of housing it is considered that no option over the plan period would lead to additional significant environmental impact compared to other options. Options 2a and 2b better reflect the current and future housing needs of the Borough and would be better aligned with the economic situation of the Borough. A better balance of housing and employment is important in achieving sustainable development, with housing to meet employment needs, it is hoped, not leading to a net increase in commuting.

#### *Alternative development strategies*

**6.6** Following consultation on the Interim SA report, two alternative strategies were put forward. These were to only use brownfield land and to only use land within existing settlements. In order to assess the sustainability of these options, information from the Strategic Land Availability Assessment (SHLAA) has been used to determine if the alternative strategies put forward represent reasonable alternatives.

Table 6.3: Appraisal of alternative strategies

SA Objective/Alternative strategy		Only using brownfield land	Only using land within existing settlement boundaries	Comments
1	Housing	✓	✓	Whilst there is some capacity within settlement boundaries and on brownfield land neither option would meet the required housing needs of the Borough. This would be particularly noticeable in the medium to longer term as sites become less available
2	Economy	-	-	Likely that the demand for land in both options would result in the potential loss of employment as housing land may be more viable and profitable for developers in the shorter term
3	Transportation	0	0	Whilst both options will lead to development in sustainable locations, both options could lead to congestion and put greater pressure on the exiting road network.
4	Climate change, energy and air quality	✓	✓✓	Both options will have a positive impact on this objective due to opportunities for district heating networks, reusing resources and sustainable travel to services and facilities
5	High quality design and sustainability	✓✓	0	Overall reusing brownfield land has the potential to improve the appearance, design and sustainability of many buildings.
6	Green Infrastructure and Open Space	0	0	Unlikely that either option would have an impact on this objective
7	Town centre	0	0	Unlikely that either option would have an impact on this objective as both options are broadly a continuation of what has taken place in recent years.
8	Rural Communities	0	-	There is greater opportunity to re-use brownfield land in the countryside, however this might not necessarily be in sustainable locations. The majority of settlement boundaries are now at capacity and in the longer term this strategy would not meet local rural housing or development needs.
9	Flood risk	0	✓	There is uncertainty over whether brownfield sites would be in areas

				outside the flood zone. Appraisal assumes that locations within settlement boundaries are not within flood zones.
10	Use of land	✓	✓	Both options will result in efficient use of land however in the longer term it is likely that neither option would meet development needs
11	Natural Resources	✓	✓	Both options will result in efficient use of land
12	Quality of Life	✓	0	Development of derelict brownfield land or change from uses which have an environmental impact could have a positive impact on quality of life
13	Countryside and Landscape quality	?	?	Impact is dependent on location of brownfield site and ability of settlements to develop further. There could be a potential impact on character of settlements due to higher density development
14	Biodiversity and Geodiversity	0	0	Unlikely neither option would lead to positive or negative impact
15	Water Quality	✓	✓	Positive impact assuming water resources are in place. Investment in existing infrastructure may be required.
16	Historic Environment and Heritage Assets	0	0	Unlikely either option would have an impact on this objective although both could put pressure on historic buildings.

**6.7** Overall there would be many positive effects from implementing either alternative strategy in the short to medium term. In the longer term it is likely that neither option will allow the housing and employment requirement to be met, putting pressure on existing development. Using information in the Strategic Housing Land Availability Assessment there is capacity for 4,476 dwellings within settlement boundaries. Using information in the Strategic Housing Land Availability Assessment there capacity for 4,326 on brownfield land. Neither of these options is therefore considered a reasonable alternative as they would not meet the housing requirement for the Borough. Even if enough land were available there is added uncertainty over the deliverability of sites, making a strategy which is wholly within the settlement boundary and/or brownfield sites difficult to justify.

#### *Alternative Strategic Sites*

**6.8** Since consultation on the Interim SA and Preferred Options, additional sites have been suggested for inclusion within the development strategy or within the Strategic Housing Land Availability Assessment. Where these sites meet the

criteria set out table 3.4 in the methodology they have been appraised. An appraisal of these sites is contained in tables 6.4 and 6.5.

### **Burton sites**

- Crown Industrial Estate (SHLAA site 31)
- Land North of Beamhill Road, West of Tutbury Road (SHLAA site 69, 83)
- Reservoir Road (SHLAA sites 75 and 373)
- Hopley Road (SHLAA sites 76 and 114)
- Tutbury Road - Extended allocation (SHLAA site 376)
- Middle Yard, Hawkins Lane (SHLAA site 378)
- Land North of Beamhill Road (SHLAA site 380)
- Derby Road (SHLAA site 381)
- Burton Hospital (SHLAA site 283)

### **Uttoxeter**

- Brookside Rd Uttoxeter (SHLAA site 33)
- Land South of Demontfort Way (SHLAA site 67)
- Blounts Green Farm, Stafford Road, Uttoxeter (site 349)
- Derby Road, Uttoxeter (known as SHLAA site 382) – for employment

### **Strategic Service Villages**

- Land at Craythorne Road/ Beacon Road, Rolleston on Dove (site 122)
- Land South of Walford Road, Rolleston on Dove (site 159)
- Knowles Hill, Rolleston (site 375)
- Rocester (planning application for 90 dwellings)<sup>12</sup> – considered even though less than 90)

### **Outside of settlements**

- Twin Rivers

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<sup>12</sup> Site has been considered even though below the threshold of 100 due to size of Rocester, site is considered strategic



**Table 6.4: Appraisal of alternative sites**

SA Objective/Local Plan Policy	Burton sites								
	Crown Industrial Estate	Land North of Beam hill Road, West of Tutbury Road	Reservoir Road	Hopley Road	Tutbury Road - Extended allocation	Middle Yard, Hawkins Lane	Land North of Beam hill Road	Derby Road (collection of sites)	Burton Hospital site
Housing	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓
Economic Opportunities	-	✓	✓	✓	✓	✓	✓	✓	0
Transportation	✓	?	✓	✓	✓	✓	-	✓	✓
Flood Risk	0	?	0	0	0	-	✓	-	0
Use of Land	0	-	-	-	-	✓✓	-	✓✓	✓✓
Countryside and Landscape quality	0	-	-	-	0	0	?	0	0
Biodiversity and Geodiversity	?	?	?	?	0	?	?	?	0
Historic Environment and Heritage Assets	0	-	?	?	0	?	?	0	0
Accessibility to Services	✓✓	✓	✓	-	✓	✓✓	?	✓✓	✓✓
Local Distinctiveness	✓	-	?	✓	✓	✓	0	✓	✓
Existing settlements	✓	✓	0	✓	✓	✓	0	✓	✓

**Table 6.5: Appraisal of Alternative sites**

SA Objective/Local Plan Policy	Uttoxeter				Rolleston			Rocester	Outside of settlements
	Brookside Rd Uttoxeter	Land South of Demontfort Way	Blounts Green Farm, Stafford Road, Uttoxeter	Derby Road, Uttoxeter	Land at Craythorne Road/Beacon Road, Rolleston on Dove	Land South of Walford Road, Rolleston on Dove	Knowles Hill, Rolleston	Land south of Rocester	Twin Rivers
<b>Housing</b>	✓✓	✓✓	✓✓	0	✓✓	✓✓	✓✓	✓✓	✓✓
<b>Economic Opportunities</b>	0	✓	-	✓✓	0	✓	✓	?	✓✓
<b>Transportation</b>	✓	✓	-	✓	✓	✓	✓	✓	--
<b>Flood Risk</b>	-	0	?	?	0	0	?	?	?
<b>Use of Land</b>	✓	-	-	-	-	-	-	✓	--
<b>Countryside and Landscape quality</b>	0	0	-	0	0	-	-	?	--
<b>Biodiversity and Geodiversity</b>	?	?	?	?	?	?	-	?	-
<b>Historic Environment and Heritage Assets</b>	0	-	-	?	0	?	-	?	?
<b>Accessibility to Services</b>	✓✓	✓✓	-	✓✓	✓✓	✓✓	✓	✓	✓✓
<b>Local Distinctiveness</b>	✓	?	-	✓	?	?	-	✓	✓
<b>Existing settlements</b>	✓	✓	✓	✓	✓	✓	✓	✓	?

**Summary of appraisal of alternative sites**

**Crown Industrial Estate (SHLAA site 31)**

**6.9** Crown Industrial Estate is a brownfield site located within the Burton urban area. It is a medium sized site with the potential to deliver up to 200 houses. The site scores positively in terms of housing, transport, use of land and access to local services. It also scores positively in terms of countryside and landscape quality because the redevelopment of the site would improve the existing

townscape through the removal of employment land, landscaping and provision of links to the town centre. The site could be subject to contamination which could add a cost to redevelopment; however redevelopment would offer the opportunity to improve the condition of the site. Whilst the redevelopment would lead to the loss of employment land there is the potential for the tenant to relocate within the town, to more efficient buildings in more suitable locations.

### **Land North of Beamhill Road, West of Tutbury Road (SHLAA site 69, 83)**

**6.10** Sites in this location are greenfield agricultural land. Large scale development in this location would have a negative impact on land use and impact on the countryside character. The location as edge of town has limited access to nearby services and facilities and access to the town centre or employment areas. There are many uncertain impacts in terms of landscape impact.

### **Reservoir Road (SHLAA sites 75 and 373)**

**6.11** This medium sized site is positive in terms of access to public transport. The site topography would mean development would have a negative impact on the landscape and edge of settlement character. The site is also adjacent to site of Biological Interest - Oaks Wood. There are barriers to development due to possible land contamination, the presence of an underground reservoir and phone mast to the north of the site.

### **Hopley Road (SHLAA sites 76 and 114)**

**6.12** This large greenfield site would have a negative impact on landscape and countryside character. Impact on the transport network also scores negatively due to the rural character of roads in this area. The site is more isolated compared to other greenfield locations on the edge of Burton and therefore scores negatively against access to services, facilities, employment and public transport.

### **Tutbury Road - Extended allocation (SHLAA site 376)**

**6.14** This site would involve additional greenfield development, north of the current planning application and proposed strategic site allocation. Whilst the site could be linked to the current application, including facilities, access there would be an impact on the surrounding countryside and character.

### **Middle Yard, Hawkins Lane (SHLAA site 378)**

**6.15** This is a town centre brownfield site which has the potential to deliver a high number of dwellings in a sustainable location. There is good access to service, facilities, bus transport and employment. In terms of character, mitigation in terms

of sensitive design may be required but overall it is considered that development would not have a negative impact on the townscape. There could be an issue of noise impacts due to surrounding employment uses and mitigation measures could be required. Development would have to be considerate to the setting of the adjacent conservation areas.

### **Land North of Beamhill Road (SHLAA site 380)**

**6.16** Sites in this location are greenfield agricultural land. Large scale development in this location would have a negative impact on land use and impact on the countryside character. The edge of town location has limited access to nearby services and facilities and access to the town centre or employment areas.

### **Derby Road (SHLAA site 381)**

**6.17** This is an edge of town centre brownfield site which has the potential to deliver a high number of dwellings in a sustainable location. There is good access to service, facilities, bus transport and employment. In terms of mitigation sensitive design may be required but overall it is considered that development would not have a negative impact on the townscape. There could be an issue of noise impacts due to surrounding employment uses and mitigation measures could be required. Currently the mix of uses creates a disjointed feeling to the area and residential development would enhance the area by creating better continuity assisting in regenerating this part of Burton.

### **Burton Hospital (site 382)**

**6.18** This is a brownfield site of 3.79 hectares. The surrounding areas are residential and so it is considered there would be limited impact in terms of character and appearance and impact on the road network. There would be positive impacts in terms of access to nearby facilities and services and use of land.

## **Uttoxeter**

### **Brookside Rd Uttoxeter (SHLAA site 33)**

**6.19** This site was not previous allocated as it was considered too small to be classed as strategic. However due to the location of the site, in the centre of Uttoxeter close to the town and train station it is considered that a higher density on site would be suitable and therefore the site has been appraised for this stage. Redeveloping the site would involve some loss of employment land however it is

considered, and shown by the Employment Land Review, sufficient employment sites with capacity to meet the needs of Uttoxeter. Redevelopment would have positive impacts in terms of access, character and appearance, use of land and impact on infrastructure.

#### **Land South of Demontfort Way (SHLAA site 67)**

**6.20** This is an edge of town greenfield site. There are positive impacts in terms of access to employment and services but several negative or uncertain impacts in terms of impact on the countryside, loss of greenfield land, biodiversity and the historic environment.

#### **Blounts Green Farm, Stafford Road, Uttoxeter (site 349)**

**6.21** This is a large greenfield development. Overall the appraisal concludes many negative impacts from developing this site in terms of landscape, historic environment and access. The area is of high landscape quality with evidence of high archaeological value.

#### **Derby Road, Uttoxeter (known as SHLAA site 382)**

**6.22** This large greenfield site was a previous employment allocation in the Local Plan 2006. The site has good access to the transport network and Uttoxeter town. Part of the site is within the flood zone and so mitigation would be required and careful design to ensure sensitive uses are not located in this area. Overall it is important to the development strategy that the balance of housing and employment is appropriate to ensure that there is no need to travel elsewhere to access the right jobs or housing. Developing the whole of this site for residential purposes would conflict with this balance and so it has been appraised as an employment site, in line with the evidence set out in the Employment Land Review which advises protecting the site for employment.

#### **Land at Craythorne Road/ Beacon Road, Rolleston on Dove (site 122)**

**6.23** This site could deliver the housing requirement for Rolleston on Dove, a strategic village in the strategy. The site has many positive impacts against sustainability appraisal objectives with negative or uncertain impacts in terms of landscape impact and ability to be incorporated with the existing settlement character.

#### **Land South of Walford Road, Rolleston on Dove (site 159)**

**6.24** This site could deliver the housing requirement for Rolleston on Dove, a strategic village in the strategy. The site has many positive impacts against sustainability appraisal objectives with negative or uncertain impacts in terms of

landscape, historic environment and impact and ability to be incorporated with the existing settlement character. Access to the site is also an issue.

### **Knowles Hill, Rolleston (site 375)**

**6.25** This large site would merge Burton and Rolleston, affecting the character of the existing green gap between the settlements. The site would incorporate a large greenfield with relatively good access to the transport network. Negative or uncertain impacts include landscape, biodiversity and distinctiveness of the Boroughs settlements and edge of Burton character.

### **Land South of Rocester (Planning application)**

**6.26** This site has been considered strategic due to the size of Rocester. Development here would meet the needs of the settlement and surrounding hamlets and villages. Development would also support the viability of local services and facilities. There is uncertainty over flooding and drainage of the site which is acknowledged in the appraisal.

### **Twin Rivers (Rep 1693 from Preferred Options Pre-Submission)**

**6.27** The Brookhay Villages and Twin Rivers Park proposal has a number of uncertain impacts, particularly on biodiversity, historic assets and natural resources. The area is rich in biodiversity and historic assets, and there is insufficient information in the representation to be certain about likely impacts. The impact on air and water quality is also uncertain. The proposal promotes renewable energy, flood risk reduction and protection of mineral resources, and landscape is likely to be improved.

**6.28** The proposal envisages the creation of 8,000 jobs, but this could potentially undermine the vitality of other employment areas in both Burton Upon Trent and neighbouring Lichfield District. There will be significant improvements to transport infrastructure with improved choice and accessibility, but the proposal is likely to increase demand for road space on the A38 and promote commuting to/from other settlements.

**6.29** Housing development would be provided in neighbouring Lichfield District, with associated facilities and services. The proposal will encourage increased participation in sport, as well as increased walking and cycling, however these may not be noticed until the longer term.



## Alternative Sites subject to Sustainability Appraisal

**6.30** The following list concludes all the alternative sites which have been subject to sustainability appraisal as part of the Interim Sustainability Appraisal or this Sustainability Appraisal Report:

### **Burton sites**

- Crown Industrial Estate (SHLAA site 31)
- Land North of Beamhill Road, West of Tutbury Road (SHLAA site 69, 83)
- Reservoir Road (SHLAA sites 75 and 373)
- Hopley Road (SHLAA sites 76 and 114)
- Tutbury Road - Extended allocation (SHLAA site 376)
- Land North of Beamhill Road (SHLAA site 380)
- Burton Hospital (SHLAA site 283)
- Belvedere Social Club (SHLAA site 113)
- Land north of Stretton (SHLAA site 178)
- Land at Bitham Lane, Stretton (SHLAA site 346)
- Redhouse Farm (SHLAA site 107)
- Land at Henhurst Hill (SHLAA site 125)

### **Uttoxeter**

- Land South of Demontfort Way (SHLAA site 67)
- Blounts Green Farm, Stafford Road, Uttoxeter (SHLAA site 349)
- Land off Bramshall Road (SHLAA site 48)
- Land south of Bramshall Road, including Ryecroft Farm (SHLAA site 95)
- Land south of Wood Lane (SHLAA site 97)

### **Strategic Service Villages**

- Land at Belmont Road, Tutbury (SHLAA site 47)
- Land to the North West of Barton under Needwood (SHLAA site 51)
- Barton Park Farm, Barton under Needwood (SHLAA site 344)
- Land at Craythorne Road/ Beacon Road, Rolleston on Dove (SHLAA site 122)
- Land South of Walford Road, Rolleston on Dove (SHLAA site 159)
- Knowles Hill, Rolleston (SHLAA site 375)

### **Outside of settlements**

- Twin Rivers

## Appraisal of the Pre-Submission Local Plan

### The amended Vision

**6.31** The following Vision is drawn from the responses received from public consultations and working with stakeholders, Parish Councils, Members and officers of the Borough Council. The appraisal of the amended vision has been incorporated into the appraisal of the objectives in table 6.8, due to the relationship between the vision and the objectives. The vision is as follows:

*In the future East Staffordshire's communities will be well planned, vibrant, safe and inclusive. New developments will be designed to a high standard and will celebrate the rich diversity in the borough and its distinct settlements.*

*Quality housing will be available with a variety that meets the needs of all sectors of the community and the aspirations of a growing population. New landscaping and the existing environment will allow for improved leisure activities on peoples doorsteps, increasing opportunities for following healthier lifestyles and sustainable travel.*

*The council will lead a place-shaping agenda which over the next 19 years will sensitively enhance the quality and extent of the commercial, business and housing offer that is currently available, whilst respecting the context and identities of detached settlements and the wider environment, taking into consideration climate change and sustainability.*

**Burton upon Trent:** *will be a positive and ambitious town, which has developed its sub regional status as an economic, retail, and cultural centre. The anticipated growth in employment opportunities over the next twenty years will have realised the potential to generate prosperity across communities in the borough and this will be supported by housing to ensure that development is sustainable and reduces overall levels of commuting, especially by car.*

*Burton upon Trent will be recognised nationally as the "Capital" of the National Forest, with a high quality and diverse green infrastructure network providing environmental, biodiversity, health, and sustainable transport opportunities.*

*The town will embrace its heritage and look to the future and capitalise on its enviable transportation links, using available brown field sites to increase the number of people living in the town and improve the retail experience.*

*Inner Burton will have an improved housing stock, through private sector investment and the development of brownfield sites. Environmental and infrastructure improvements will be delivered by both public and private funds.*

**Uttoxeter:** *will have a multi-functional, attractive Town Centre that incorporates a wide-ranging mix of activities set within a high quality network of pleasant streets and spaces, which create a strong identity and a place where people want to live, work and visit. The town will build upon its strategic location, its unique historic environment and its shops and markets, to attract and retain new investment for the benefit of local business and residential communities.*

*Significant growth and change will be welcomed through the implementation of sustainable urban extensions. There will be associated environmental benefits to the growth with improvements to community and health facilities and better access to improved open spaces.*

**The Rural Areas:** *The boroughs' rural areas are extensive and diverse and will be celebrated. Opportunities for sustainable rural economic growth and jobs will be actively encouraged and will be supported by access to high quality broadband to help improve the prosperity of the borough as a whole.*

*Larger strategic villages will build upon their role as rural centres for residents in the local area with services, facilities and jobs enabling people in the wider area to live and work locally. Smaller village communities will also continue to thrive and will have distinctive and appropriate levels of growth, shaped by the people who live and work in the area.*

*Well managed, sustainable tourism will be a major driver in regenerating the rural areas and enhancing their character and quality. In the east of the borough, the National Forest will continue to be a major driver in enhancing the rural environment and creating employment opportunities. There will be environmental, economic and social benefits from river corridor opportunities which will also link between existing attractions. Embracing new technologies which meet the future needs of the population will facilitate the rural economy.*

*Major redundant sites and remaining underutilised parts of the former military camps in the countryside will have been brought into suitable new*

*uses to improve the environment and/or diversify the rural economy where appropriate, or restored to open landscaped countryside.*

*In the countryside, the richness of the Borough's landscape and its biodiversity will continue to be valued and protected in a way which sensitively accommodates the needs of farmers, rural businesses, visitors and residents. Landscape character and quality will be conserved and enhanced and biodiversity fostered with appropriate new landscaping encouraged. Public access to the countryside will be extended with new walking, cycling and horse riding routes developed.*

## Revised Strategic Objectives

**6.32** The Sustainability Appraisal previously concluded that the Strategic Objectives were broadly in line with the sustainability framework however it was recommended that a number of amendments would benefit the overall sustainability of the Strategic Objectives. The Revised Strategic Objectives and associated appraisal is set out below.

**6.33** The Pre-Submission Local Plan contains the following Plan Objectives:

**Table 6.6: Pre-Submission Plan Objectives**

<b>Objective 1: Well designed communities</b>	To develop green infrastructure-led strategic housing growth providing well designed communities that provide accessible green space, services and facilities, promote distinctiveness, wellbeing, whilst protecting and enhancing sensitive environments
<b>Objective 2: Housing choice</b>	To provide a mix of well designed, sustainable market, specialist and affordable homes that meet the needs of existing and future residents and respond to the ongoing and expected population change in the Borough.
<b>Objective 3: Accessibility and transport Infrastructure</b>	To ensure that new development will be supported by high quality transport infrastructure and designed in a way that reduces the need and desire to travel by car through encouraging the use of public transport, walking, cycling and rail travel.
<b>Objective 4: Neighbourhood Planning</b>	To ensure local communities have opportunities to help plan their own neighbourhoods and positively and sustainably shape where development is located

<p><b>Objective 5: Economic Diversification</b></p>	<p>To foster and diversify the employment base of Burton upon Trent to support higher growth and higher quality jobs, and the employment base of Uttoxeter to reduce the reliance on a limited number of employers, by allocating high quality sustainable employment sites and improving the environmental quality and image of these key economic centres by utilising Green Infrastructure.</p>
<p><b>Objective 6: Rural Economy</b></p>	<p>To sustain and enhance employment opportunities in the rural part of the Borough by promoting local distinctiveness and in particular make the most of employment and business opportunities associated with the National Forest.</p>
<p><b>Objective 7: Centres</b></p>	<p>Maintain and enhance Burton upon Trent and Uttoxeter town centres and other local centres as thriving, attractive and accessible places to be for residents, visitors and people working in them, ensuring that our centres are vibrant places with a range of retail, culture and leisure options to meet all needs.</p>
<p><b>Objective 8: Education infrastructure</b></p>	<p>To plan for and deliver new education infrastructure to meet the growing need of Borough residents and particularly in Burton upon Trent where school place demand exceeds supply</p>
<p><b>Objective 9: Historic Environment</b></p>	<p>To create high quality places that capitalise on the role the historic environment has in promoting local distinctiveness, place making, significance and supporting heritage-led regeneration, in particular through heritage assets of Burton upon Trent and the attractive historic qualities of Uttoxeter and the rural villages.</p>
<p><b>Objective 10: Flood Risk</b></p>	<p>To plan for and reduce the impacts of climate change including ensuring that new development in settlements along our river corridors in particular are not exposed unnecessarily to the risk of flooding or increases the risk of flooding elsewhere, recognising the benefit of Green Infrastructure.</p>
<p><b>Objective 11: Prudent use of Resources</b></p>	<p>To promote the prudent use of finite resources and the positive use of renewable resources, through the design, location and layout of development and by optimising the</p>

	use of existing infrastructure.
<b>Objective 12: Countryside</b>	To protect, conserve and enhance the local countryside, character, distinctiveness and quality of the landscape and the diversity of wildlife and habitats.

## B1 – Appraisal of amended objectives

Table 6.7: Key for sustainability appraisal

✓	<b>Broadly Compatible</b> – pursuing the Local Plan objective is likely to help achieve the sustainability objective
*	<b>Potential Conflict</b> – pursuing the Local Plan objective may work against or prevent the sustainability objective being achieved
~	<b>No clear link</b> – the Local Plan objective is unlikely to have any direct influence on this sustainability objective
?	<b>Depends on Implementation</b> – by pursuing the Local Plan objective there may be mixed implications for the sustainability objective, depending on how it is pursued

Table 6.8 Appraisal of Plan Objectives

Local Plan Strategic Objective	Vision	Well designed communities	Housing choice	Accessibility and transport	Neighbourhood Planning	Economic Diversification	Rural Economy	Centres	Education Infrastructure	Historic Environment	Flood Risk	Prudent use of Resources	Countryside
Housing	✓✓	✓	✓	✓	✓	✓	✓	✓	~	~	*	*	*
Economy	✓✓	✓	~	✓	✓	✓	✓	✓	~	~	~	*	*
Transportation	✓	✓	~	✓	✓	✓	*	✓	✓	~	~	*	~
Climate change, energy and air quality	✓	✓	✓	✓	✓	✓	*	✓	~	~	✓	✓	~
High quality design and sustainability	✓	✓	✓	✓	✓	✓	✓	✓	~	✓	✓	~	~
Green Infrastructure and Open Space	✓	✓	~	✓	✓	✓	~	✓	✓	~	✓	~	✓
Town centre	✓	✓	✓	✓	~	✓	~	✓	~	✓	*	~	~
Rural Communities	✓	✓	✓	✓	✓	~	✓	~	~	✓	~	~	✓



Flood risk	✓	~	~	~	~	~	~	~	x	?	~	✓	✓	~
Use of land	?	x	~	✓	~	~	~	~	✓	?	~	✓	✓	~
Natural Resources	?	~	~	~	~	~	~	~	~	~	~	~	✓	✓
Quality of Life	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	~	✓	~	✓
Countryside and Landscape quality	✓	✓	~	~	~	~	x	✓	✓	~	✓	~	✓	✓
Biodiversity and Geodiversity	✓	✓	~	~	~	~	~	?	~	~	~	✓	~	✓
Water Quality	✓	✓	~	~	~	~	?	?	?	~	~	✓	✓	~
Historic Environment and Heritage Assets	✓	✓	~	~	~	~	?	?	✓	~	✓	✓	~	?

**6.34** There has been some amendment to the strategic plan objectives which include the deletion of the inner Burton regeneration objective, Burton and Uttoxeter Town Centre objectives and the inclusion of an education infrastructure policy and a general centres objective. There have been slight word amendments to some objectives which have included the recommendations set out in the Interim SA Report. Overall it is considered that when appraised against the sustainability objectives, there are still many consistencies with all objectives as both are aiming towards achieving sustainable development.

#### Appraisal of strategic site allocations

**6.35** Based on the outcomes of the sustainability appraisal of all sites, including alternatives, consultation responses, submitted planning applications and updated evidence, the Local Plan Pre-Submission includes the following proposed strategic site allocations:

Table 6.9 Strategic Site Allocations

<b><u>Housing</u></b>			
<b><i>Burton upon Trent</i></b>	Branston Depot	483	
<b><i>Brownfield</i></b>	Bargates/Molson Coors High Street	350	
	Molson Coors Middle Yard, Hawkins Lane	300	
	Derby Road	250	
	Pirelli	300	
	Pirelli	660	
	<b><i>Greenfield</i></b>	Land South Of Branston	2580
		Branston Locks	500
		Tutbury Road/Harehedge Lane	950
		Beamhill/Outwoods	100
		Guinevere Avenue	
<b><i>Uttoxeter</i></b>			
<b><i>Brownfield</i></b>	Brookside Industrial Estate	150	
	JCB, Pinfold Road	257	
<b><i>Greenfield</i></b>	Uttoxeter West	700	
	Stone Road	100	
	Hazelwalls	350	
<b>Tier 1: Strategic Villages:</b>			
Barton under Needwood	<b>Efflinch lane</b>	130	
<b>Rolleston on Dove</b>	<b>College Fields Site</b>	100	

<b>Rocester</b>	<b>Land South of Rocester</b>	<i>90</i>
<b>Tutbury</b>	<b>Land off Burton Road</b>	<i>224</i>
<b><u>Employment</u></b>		
<b>Burton upon Trent</b>	Branston Locks	20 ha
<b>Uttoxeter</b>	Uttoxeter West	10 ha
	Derby Road	10 ha

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

Table 6.10 Strategic Site Allocations Appraisal – Burton Upon Trent

SA Objective/Local Plan Policy	LSOB	Brans ton Locks	Harehe dge	Beam hill	Guine vere	Brans ton Depot	Derby Road	Pirelli	Bargates and Molson Coors High Street	Middle Yard
Housing	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓✓	✓	✓✓
Economic Opportunities	✓✓	✓✓	✓	✓	✓	?	✓	✓✓	✓✓	✓
Transportation	✓	✓✓	✓	✓	✓	✓✓	✓	✓✓	✓/!	✓
Flood Risk	-	-	0	0	0	-	-	-	0	-
Use of Land	-	--	-	--	-	✓	✓✓	✓	✓	✓✓
Countryside and Landscape quality	0	0	--	-	0	✓✓	0	✓✓	✓✓	0

Biodiversity and Geodiversity	0	?	?	0	0	0	?	0	0	?
Historic Environment and Heritage Assets	0	?	?	0	0	-	0	?	?	0
Accessibility to Services	✓✓	✓✓	✓	✓	✓	✓✓	✓✓	✓✓	✓✓	✓✓
Local Distinctiveness	✓✓	✓✓	-	0	✓	✓✓	✓	✓	✓✓	✓
Existing settlements	✓	✓	✓	✓	✓	✓	✓	✓	✓✓	✓

Table 6.11 Strategic Site Allocations Appraisal – Uttoxeter and Strategic Villages

SA Objective/Local Plan Policy	Uttoxeter						Rolleston	Barton	Tutbury	Rocester
	Uttoxeter West	Stone Road	Hazelwalls	Brookside	JCB	Dove Way/Derby Road Employment site	College Fields Rolleston	Efflinch Lane Barton	Land south west of Tutbury	Land south of Rocester
Housing	✓✓	✓	✓✓	✓✓	✓✓	0	✓✓	✓✓	✓✓	✓
Economic Opportunities	✓✓	✓✓	✓	0	✓✓	✓✓	0	✓	✓	?
Transportation	✓✓	✓	-	✓	✓✓	✓	0	✓	✓	✓
Flood Risk	0	0	0	-	-	0	0	0	?	?
Use of Land	✓	-	-	✓	✓	-	-	-	-	✓
Countryside and	0	0	-	0	✓✓	0	0	✓	0	?

Landscape quality										
Biodiversity and Geodiversity	?	0	-	?	✓	0	0	✓	0	?
Historic Environment and Heritage Assets	0	0	?	0	?	0	✓	?	0	?
Accessibility to Services	✓✓	✓✓	0	✓✓	✓✓	✓	?	✓	✓✓	✓
Local Distinctiveness	✓✓	✓	-	✓	✓✓	0	?	✓	✓	✓
Existing settlements	✓✓	✓	✓✓	✓	✓✓	✓	?	✓	✓	✓

## Summary of the Appraisal of the Strategic Sites:

### Burton upon Trent

#### Branston Depot

**6.36** Branston Depot is a brownfield site located within the Burton urban area. It is a large site with the potential to deliver a mixed community with some on site facilities which can deliver daily needs. The site scores positively in terms of housing, transport, use of land and access to local services. It also scores positively in terms of countryside and landscape quality because the redevelopment of the site would improve the existing townscape through the removal of employment land, inclusion of green spaces and provision of links with adjacent residential areas which will improve permeability for the existing community. However, development of this site would lead to loss of some employment land,



but there is the potential for the tenant to relocate within the Borough. In addition, there is a Grade II listed, office block, canteen and pump house on site, which whilst this has been classed as a negative impact, redevelopment actually provides the opportunity to restore these premises and reverse the current pattern of disrepair. The office block is considered to be the most architecturally elaborate complex built under the National Factories scheme.

### **Pirelli, Beech Lane, Burton**

**6.37** Pirelli is a brownfield site located within the Burton urban area. This former manufacturing site, offers the potential to deliver up to 300 houses on a mixed use development scheme comprising residential, Class B1, B2 and B8 industrial units, hotel, public house and restaurant. This site offers significant benefits in terms of housing, economic opportunities, transportation due to its location on a transport corridor, use of land, countryside and landscape quality, access to services, local distinctiveness and existing settlements. The development of this site will lead to the positive development of unutilised land and the `rebirth` of the canal corridor which is considered to be a key feature of the town's heritage. The site scores negatively due to its location within Flood Zone 2 and 3a/b. A site specific flood risk assessment and a sequential test have been undertaken to direct residential development to least vulnerable areas.

### **Land North of Stretton, Burton upon Trent**

**6.38** This is a greenfield site located on the edge of Burton urban area. It has the potential to deliver a mix of house types and is located close to Burton's existing employment areas. However, whilst the site is within walking distance to some local services the town centre is only accessible by bus. It is likely that the location will increase the volume of cross-town traffic and is likely to cause congestion on the minor local roads. Development at this location would also significantly encroach on the open countryside which divides Burton and Rolleston on Dove, the impact of which would be difficult to mitigate. There are also a number of environmental and historic features in close proximity to the site.

### **Land Nth of Harehedge Lane, Burton**

**6.39** Harehedge Lane is greenfield site located on the edge of Burton upon Trent. The site has the potential to deliver a mix of house types and is located close to Burton's existing employment areas. The site is within walking distance to some local services but not to the town centres. Education facilities are well catered for within the area and the site itself has already received permission for a primary school. This greenfield site scores positively in terms of local distinctiveness and there is no impact in relation to countryside and landscape character because the site is contained by residential development on three sides, and sits within the topography providing an opportunity for the development to contribute to the existing sense of place.

### **Land South of Beamhill Road, Burton**

**6.40** Land south of Beamhill is a greenfield site located on the edge of Burton. It is a large site which would be capable of delivering a mix of housing and local facilities to support the new population. The sites location close to the A511 provides it with good access and the site would be well served by public transport. There would be a significant negative impact on the Countryside and landscape quality owing to the size of the development site and its elevated position within the landscape. Whilst the site is bounded around almost three sides this existing urban form does not translate well in terms of containment for the site due to a rural and open countryside characteristic.

### **Land West of the A38 (Lawns Farm)**

**6.41** This is a large mixed use development site comprising housing and employment. The size of the site provides opportunities to deliver a range and mix of house and employment types. The capacity of this site has the potential to create a sustainable community which will provide services and facilities to meet the needs of the new population. The site is accessible to the Strategic Road Network and the Wellington Road transport corridor into Burton giving direct access to the town centre. The delivery of a community will provide opportunities to deliver a well designed and distinctive development. Given its location there is opportunity to be original in this location. There is partial location within flood zones and there is unknown potential for environmental and historic assets. The Trent and Mersey canal run through the site which is a designated Conservation Area.

### **Land South of Main Street Branston**

**6.42** This is a large greenfield site on the edge of Burton which can bring forward a range and mix of house types. The site also provides employment land and the site is in close proximity to existing employment areas such as Centrum 100. Local services could be provided to meet local needs. The site has good access to the Strategic Road Network, local services, out of town retail and the town centre by public transport. The site has the potential to link in with the existing built form and character of Branston. The site is located within Flood Zone 2 which will require mitigation.

### **Middle Yard, Burton**

**6.43** This town centre brownfield site would result in the loss of some employment land. However it is considered there is good access to employment from the site. There are many positive impacts in terms of access, viability and vitality with uncertain impacts on biodiversity, historic environment, noise impacts for future residents and flood risk. These impacts could be addressed through the planning application process and careful design of the site.

### **Molson Coors, High Street and Bargates**

**6.44** This location consists of two sites. Overall development represents good use of brownfield land in a sustainable location, close to the town centre. There are many uncertain impacts such as flooding and impact on the historic environment and heritage assets due to the location and existing buildings on the site. Overall development in the town centre would contribute to its viability and vitality by creating more day time/night time uses and redevelopment would make use of potential empty or derelict buildings. In addition the sites are in a prominent gateway position with the potential to improve the character, townscape and local distinctiveness of the area and the town. Whilst flood risk is an issue, flood defences along the Meadowside car park have been improved and reinforced. There is potential for the development in this location to impact upon the Air Quality Management Area which extends along Horninglow Street to the Derby Turn roundabout but it will depend on the format of the development that comes forward. The transport objective scores positive as the site is in a sustainable location but with uncertainty because the impact of air quality is not only unknown but also in part mitigated by the ability to reach the site by non-vehicular modes of transport.

## Derby Road

**6.45** This is an edge of town centre brownfield site which has the potential to deliver a high number of dwellings in a sustainable location. There is good access to service, facilities, bus transport and employment. In terms of mitigation sensitive design may be required but overall it is considered that development would not have a negative impact on the townscape. There could be an issue of noise impacts due to surrounding employment uses and mitigation measures could be required. Currently the mix of uses creates a disjointed feeling to the area and residential development would enhance the area by creating better continuity assisting in regenerating this part of Burton.

## The Strategic Sites: Uttoxeter

### JCB Sites

**6.46** The JCB site is a brownfield mixed use site located centrally within Uttoxeter. The site will deliver housing, employment, retail, community facilities and a town park. Its central location results in the site scoring positively in terms of transport and access to services. The site will contribute to the regeneration of the town by bringing back into use a derelict site and improving the townscape of the current area. In doing so there is an opportunity to deliver a well designed and distinctive development. There is an unknown impact on the historic environment due to the proximity of the Conservation Area and various listed buildings.

### Land West of Uttoxeter (Parks Fm)

**6.47** This site represents a large greenfield site on the western urban edge of Uttoxeter. The site has the potential to deliver both housing and employment uses and would be required to deliver services and facilities to meet the local needs of the new community. The site is contained within the landscape and has the potential for a high quality development that provides a natural infill between existing residential areas to the east of the site and the employment areas to the north. Access to the Strategic Road Network and from there to the town centre is good. There is an unknown impact on

biodiversity owing to the proximity of two BAP sites recording Lapwings and the Brown Hare. There is also a stand of Japanese knotweed.

#### **Land at Hazelwalls Farm, (off B5013), Uttoxeter**

**6.48** This is a large greenfield site located on the southern urban edge of Uttoxeter capable of delivering a mix of housing types. There are concerns over the capacity of the local road network in accommodating proposals. There is an impact on the countryside due to the large size of the site and the way in which it extends into the countryside. The prominent position that the site occupies is likely to detract from the sense of place in this part of Uttoxeter. There is a significant impact on biodiversity due to a number of habitats and species on the site. There is an unknown impact on historic assets.

#### **Land at Stone Road, Uttoxeter**

**6.49** This is a small greenfield site close to the centre of Uttoxeter. Opportunities for delivering housing mix and type are more limited however the proximity of the site to employment opportunities and the town centre services and facilities is very good. The site fits in with the existing settlement pattern and has the potential to integrate with surrounding facilities.

#### **Brookside Rd Uttoxeter (SHLAA site 33)**

**6.50** This site was not previously allocated as it was considered too small to be classed as strategic. However due to the location of the site, in the centre of Uttoxeter close to the town and train station it is considered that a higher density on site would be suitable and therefore the site has been appraised for this stage. Redeveloping the site would involve some loss of employment land however it is considered, and shown by the Employment Land Review sufficient employment sites with capacity to meet the needs of Uttoxeter. Redevelopment would have positive impacts in terms of access, character and appearance, use of land and impact on infrastructure.

#### **Derby Road Employment allocation**

**6.51** This large greenfield site was a previous employment allocation in the Local Plan 2006. The site has good access to the transport network and Uttoxeter town. Part of the site is within the flood zone and so mitigation would be required and

Careful design to ensure sensitive uses are not located in this area. Overall it is important to the development strategy that the balance of housing and employment is appropriate to ensure that there is no need to travel elsewhere to access the right jobs or housing. Developing the whole of this site for residential purposes would conflict with this balance and so it has been appraised as an employment site, in line with the evidence set out in the Employment Land Review which advises protecting the site for employment.

## **The Strategic Sites: Strategic Villages**

### **Land at Efflinch Lane, Barton under Needwood**

**6.52** A greenfield site located on the edge of the village, there is potential to deliver a mix of housing types and tenures. The site is within walking distance to services and facilities including the village centre. The site scores positively due to the significant levels of open space provided on site which will support biodiversity, and contribute to the character and local distinctiveness of the development. In particular the planting and mounding associated with screening the A38 will have a positive impact on the village as a whole. The impact on historic assets as the site is adjacent to the conservation areas along the canal and in close proximity to Mill Bridge which is a listed building is unknown.

### **Sports Field, Rolleston**

**6.53** Representing a greenfield site on the southern edge of the village the site is capable for delivering a mix of housing types. The village is located just beyond the Burton upon Trent urban area which provides opportunities for villages to access employment opportunities, services and facilities in Burton town centre, by bus, as well as those in the village itself. Burton opportunities however are not on the doorstep unlike those in the village. There is considered to be no impact on the countryside owing to the enclosure experienced by the site due to existing residential development to the north and east, existing trees and the flatness of the topography.



## Land South of Rocester

**6.54** This site has been included in the development strategy due to the size of Rocester and the site being considered strategic. Development here would meet the needs of the settlement and surrounding hamlets and villages. Development would also support the viability of local services and facilities. The site involves some development of brownfield land. There is uncertainty over flooding and drainage of the site which is acknowledged in the appraisal.

## Land South West of Tutbury

**6.55** This site is a greenfield site located on the edge of existing residential development. The development seeks to diversify the housing offer in Tutbury with a range of sizes and tenures, including bungalows suitable for the elderly, affordable housing and self build. The village centre, which has a good range of services and facilities, is in walking distance with a railway station at Hatton 1 mile away.

## Appraisal of Pre-Submission Policies

Table 6.12 Policy 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 or 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

## Strategic Policies

Principle 1: Presumption in favour of sustainable development

1. East Staffordshire approach to sustainable development
2. A strong network of settlements
3. Provision of Homes and Jobs
4. Distribution of Housing Growth
5. Distribution of Employment growth
6. Managing the Release of Housing and Employment land
7. Sustainable urban extensions
8. Development outside development boundaries
9. Infrastructure Delivery and Implementation
10. Education
11. Bargates/Molson Coors site

**Table 6.13 Strategic Policy Appraisal**

	SA Objective/Local Plan Policy	1	2	3	4	5	6	7	8	9	10	11	Comments
1	Housing	✓	✓	✓	✓	0	✓	✓	✓	0	0	✓	Many of the policies support the delivery of new homes and in some cases would not restrict development of homes coming forward
2	Economy	✓	✓	✓	0	✓	✓	✓	✓	0	0	0	These policies aim to meet employment needs and create the right balance of homes and jobs
3	Transportation	✓	✓	?	✓	✓	0	✓	0	✓	✓	✓	Overall, the strategy aims to provide development in sustainable locations with networks that would encourage walking, cycling, public transport

4	Climate change, energy and air quality	✓	?	?	?	?	0	✓	0	?	0	?	There are many uncertain effects in terms of climate change which are associated with resource use and unknown impacts
5	High quality design and sustainability	✓✓	0	0	0	0	0	✓	✓	0	0	✓	Design is a key component running through policies
6	Green Infrastructure and Open Space	✓	0	0	0	0	0	✓	0	✓	✓	✓	Green Infrastructure is a key thread through many policies, ensuring there is a network of a range of open spaces that will have multiple benefits
7	Town centre	✓	✓	0	✓	✓	0	0	0	✓	0	✓✓	Whilst the strategy includes greenfield development, there will be many positive impacts in terms of town centre regeneration
8	Rural Communities	✓	✓	0	✓	0	0	0	✓	?	0	0	The strategy includes development in a range of rural communities
9	Flood risk	✓	0	0	0	0	0	?	0	?	0	✓	Flood risk is referred to in several policies but it is acknowledged, there is some risk at greenfield locations
10	Use of land	✓	?	--	?	?	0	--	0	0	?	✓	There are negative effects across some policies due to large greenfield developments
11	Natural Resources	✓	0	--	0	0	0	✓	0	0	0	✓	There will be a negative effect against policy 3 due to large developments taking place and associated resource use.
12	Quality of Life	✓	✓	✓	✓	✓	0	✓	✓	✓	✓	✓	Many policies will improve health and well being through meeting housing, employment and leisure/recreation needs alongside the delivery of appropriate infrastructure
13	Countryside and Landscape quality	✓	✓	?	✓	✓	0	-	✓	0	0	✓	Protecting the landscape and countryside features in many policies but there will be a impact due to large greenfield urban extensions
14	Biodiversity and Geodiversity	✓	0	0	0	0	0	?	0	0	0	✓	Environmental considerations feature in many policies, however when appraising some policies there is no direct impact
15	Water Quality	✓	0	0	0	0	0	0	0	?	0	?	
16	Historic Environment and Heritage Assets	✓	0	0	0	0	0	0	0	0	0	✓	

- 12. Derby Road Regeneration Area
- 13. Burton and Uttoxeter Employment Policy
- 14. Rural Economy
- 15. Tourism, culture and leisure development
- 16. Meeting Housing Needs
- 17. Affordable housing
- 18. Housing Development on Exception sites
- 19. Gypsy, travellers and travelling Show people pitches
- 20. Town and Local Centres
- 21. Managing Town and Local Centres
- 22. Supporting Local Communities

**Table 6.14 Strategic Policy Appraisal**

	SA Objective/Local Plan Policy	12	13	14	15	16	17	18	19	20	21	22	Comments
1	Housing	✓	0	✓	0	✓✓	✓	✓	✓	✓	✓	0	Many policies would result in the delivery of high quality housing or alterations to existing housing
2	Economy	0	✓✓	✓✓	✓	0	0	0	0	✓	✓	0	Overall there would be many positive effects from implementing this batch of policies
3	Transportation	✓	0	0	✓	0	0	0	0	✓	✓	✓	Overall, the strategy aims to provide development in sustainable locations with networks that would encourage walking, cycling, public transport
4	Climate change, energy and air quality	?	0	0	✓	0	0	0	0	0	0	0	There is no direct effect in relation to most of these policies
5	High quality design and sustainability	0	0	0	✓	0	0	0	0	✓	✓	0	Several policies reference design

6	Green Infrastructure and Open Space	✓	0	0	0	0	0	0	0	0	✓	✓	0	Several policies reference green infrastructure
7	Town centre	✓	0	0	0	0	0	0	0	0	✓✓	✓✓	0	There will be positive effects against several policies
8	Rural Communities	?	0	✓✓	✓	✓	✓	✓	0	0	✓	0	✓	Several of these policies relate to the rural area specific which will result in many positive effects in terms of meeting the needs of rural communities
9	Flood risk	?	0	0	0	0	0	0	0	0	0	0	0	There is no direct effect in relation to most of these policies
10	Use of land	✓	0	0	0	0	0	0	0	0	0	0	0	There is no direct effect in relation to most of these policies
11	Natural Resources	✓	0	0	0	0	0	0	0	0	0	0	0	There is no direct effect in relation to most of these policies
12	Quality of Life	✓	0	0	0	✓	✓	✓	0	0	0	0	✓	Several policies, particularly the housing policies will contribute towards quality of life
13	Countryside and Landscape quality	✓	0	0	✓	0	0	0	0	0	✓	✓	0	Several policies make specific reference to landscape and townscape
14	Biodiversity and Geodiversity	?	0	0	✓	0	0	0	0	0	0	0	0	Environmental considerations feature in many policies, however when appraising some policies there is no direct impact
15	Water Quality	✓	✓	0	0	0	0	0	0	0	0	0	0	
16	Historic Environment and Heritage Assets	✓	0	0	✓	0	0	0	0	0	0	0	0	

- 23. High quality design
- 24. Green Infrastructure
- 25. Historic Environment
- 26. National forest
- 27. Climate change, water management and flooding
- 28. Renewable and low carbon energy generation
- 29. Biodiversity and geodiversity

- 30. Locally significant landscape and views
- 31. Green Belt and Strategic Green Gaps
- 32. Open Space and outdoor sports
- 33. Indoor sports
- 34. Health and wellbeing
- 35. Accessibility and sustainable transport

**Table 6.15: Strategic Policies Appraisal**

	SA Objective/Local Plan Policy	23	24	25	26	27	28	29	30	31	32	33	34	35	Comments
1	Housing	0	0	0	0	0	0	0	0	0	0	0	0	0	The majority of these policies are topic specific and not directed to the delivery of housing or employment
2	Economy	0	0	0	0	0	0	0	0	0	0	0	0	✓	
3	Transportation	✓	✓	0	0	0	0	0	0	0	0	0	✓	✓✓	Several policies specifically mention impacts on the transport network and provision of a range of transport modes
4	Climate change, energy and air quality	✓	0	0	✓	✓	✓✓	0	0	0	0	0	✓	✓	There will be positive effects through provision of green infrastructure, high quality design, tree planting and effective transport networks
5	High quality design and sustainability	✓✓	0	✓	0	0	0	0	0	0	0	0	✓	0	



6	Green Infrastructure and Open Space	✓	✓✓	0	✓✓	0	0	0	0	0	0	0	0	0	0	Positive effect through standards for GI and Open space
7	Town centre	✓	0	0	0	0	0	0	0	0	0	0	0	✓	✓	Minor positive effect through delivery of high quality design in urban and rural areas
8	Rural Communities	0	0	0	✓	0	0	0	0	0	0	0	0	0	0	
9	Flood risk	0	✓	0	0	✓✓	0	0	0	0	0	0	0	0	0	Flood risk is referenced in several policies which link to GI, SuDS and associated benefits
10	Use of land	0	0	0	0	0	0	✓	0	0	0	0	0	0	0	Limited relationship between policies and this objective
11	Natural Resources	✓	0	0	0	0	0	✓	0	0	0	0	0	0	0	There will be positive effects through provision of high quality, efficient design and delivery of renewable energy
12	Quality of Life	✓	✓	0	0	0	0	0	0	0	✓✓	✓✓	✓✓	0	0	Delivery of many of these policies will have a positive effect on health, wellbeing and quality of life
13	Countryside and Landscape quality	✓	✓	0	✓	0	✓	0	✓✓	✓✓	0	0	✓	0	0	Positive effect on landscapes, natural resources and habitats
14	Biodiversity and Geodiversity	✓	✓	0	0	✓	✓	✓✓	0	0	0	0	0	0	0	
15	Water Quality	0	0	0	0	✓	0	0	0	0	0	0	0	0	0	

16	Historic Environment and Heritage Assets	✓	0	✓✓	0	0	✓	0	0	0	0	0	0	0	0
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**Detailed Policies**

1. Design of new development
2. Designing in sustainable construction
3. Design of new residential development, extensions and curtilage buildings
4. Replacement dwellings in the countryside
5. Protecting the historic environment – All heritage Assets, Listed Buildings and Conservation Areas
6. Protecting the historic environment – Other Heritage Assets
7. Pollution
8. Tree Protection
9. Advertisements
10. Water recreation and blue infrastructure
11. European Sites
12. St Georges

**Table 6.16: Detailed Policies Appraisal**

	SA Objective/Local Plan Policy	1	2	3	4	5	6	7	8	9	10	11	12	Comments
1	Housing	0	0	0	✓	0	0	0	0	0	0	0	0	Many of these policies do not relate to the delivery of new homes
2	Economy	0	0	0	0	0	0	0	0	0	✓	0	✓	Two detailed policies are consistent with economic opportunities
3	Transportation	0	0	0	0	0	0	0	0	0	0	0	✓	Many policies do not have a direct relationship to this objective
4	Climate change,	✓	✓✓	0	0	0	0	✓	0	0	0	0	✓	Overall, several detailed

	energy and air quality													policies encourage low carbon, efficient design
5	High quality design and sustainability	✓✓	0	✓	✓✓	✓	✓	0	0	✓	0	0	✓✓	
6	Green Infrastructure and Open Space	0	0	0	0	0	0	0	0	0	✓✓	0	✓	Two policies promote blue and green infrastructure and open space
7	Town centre	0	0	0	0	0	0	0	0	0	✓	0	✓	Two policies would allow for town and rural centre regeneration through increased visitors to nearby areas
8	Rural Communities	0	0	0	✓	0	0	0	0	0	?	0	✓	
9	Flood risk	0	✓	0	0	0	0	0	0	0	✓	0	0	No direct link between many of the detailed policies
10	Use of land	0	0	0	✓	0	0	0	0	0	✓	0	-	Overall policies encourage the re-use of land and buildings
11	Natural Resources	0	✓	0	✓	0	0	✓	0	0	0	0	?	Overall policies encourage the re-use of land and buildings and efficient use of resources
12	Quality of Life	✓	0	0	✓	0	0	✓	0	✓	✓	0	✓	There will be quality of life improvements from the implementation of many of these policies
13	Countryside and Landscape quality	0	0	✓	✓	0	0	0	✓	0	✓	0	?	There will be many positive effects from the implementation of these detailed policies which aim to protect the natural and historic environment
14	Biodiversity and Geodiversity	0	0	0	0	0	0	0	✓	0	✓	✓	?	
15	Water Quality	0	✓	0	0	0	0	0	0	0	✓✓	0	✓	
16	Historic Environment and Heritage Assets	0	0	0	0	✓	✓	0	0	0	0	0	✓	

### ***Summary of Assessment/Significant Effects***

**6.56** The planning policies are intended to create and deliver sustainable communities. The policies are concerned with the strategic delivery of housing and employment growth both in terms of quantum and distribution across the Borough to a range of different settlements and the infrastructure required alongside the development. The sustainability appraisal highlights that the policies perform well against the many objectives because as a collective they seek to deliver required development, meeting current and future needs, maintain a balance of housing and employment whilst delivering infrastructure, considering environmental impact and ensuring that development contributes towards and protects elements of the environment that make the Borough unique and distinctive. There are negative impacts due to the level of growth required and associated loss of greenfield land.

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

**6.57** 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, transport infrastructure and energy efficiency will become established.

# Chapter 7

## Task B5: Cumulative Effects Assessment

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**7.1** This section of the appraisal focuses on the prediction and evaluation of the effects of the Pre-Submission Local Plan and the identification of mitigation measures. This section intends to provide an account of the predicted effects of the Local Plan as a whole, when taking into account other relevant plans, policies and programmes (identified in the Scoping Report). Table 7.1 identifies the cumulative effects of the plan in relation to the sustainability objectives and a summary of the effects.

**Table 7.1: Cumulative Effects Assessments**

		<b>Performance</b>	<b>Comments</b>
<b>1</b>	<b>Housing</b>	✓	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.
<b>2</b>	<b>Economy</b>	✓	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 will, it is hoped, bring in higher paid jobs and within 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. 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.
<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 without mitigation.



5	<b>High quality design and sustainability</b>	✓		There are specific policies relating to high 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.
6	<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.
7	<b>Town centre</b>	✓		The retail hierarchy policy aims to protect and enhance the role of town centres, whilst also allowing smaller settlements meet local need.
8	<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.
9	<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</b>	✓	-	The Local Plan contains a specific policy on the conservation and enhancement of

	<b>Geodiversity</b>			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 Pre-Submission policy compared to that of the Preferred Options document.
16	<b>Historic Environment and Heritage Assets</b>		✓	Policies are considered to perform reasonably well. An additional policy has been 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.

**7.2** Based on Table 7.1 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.

**7.3** Taking account of the above, a discussion of the effects of the Pre-Submission Local Plan 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 (set out in the non technical section of the report) 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**

**7.4** 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.

**7.5** The majority to 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.

**7.6** 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.

**7.7** 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 also

providing many other local benefits such as increases in green infrastructure and open space.

7.8 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**

7.9 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.

7.10 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.

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

7.12 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**

7.13 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.

7.14 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.

7.15 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.



**7.16** 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**

**7.17** 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.

**7.18** 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.

**7.19** 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**

**7.20** 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 Borough from a national or global trend.

**7.21** 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.

**7.22** 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 the some sustainable urban extensions allowing residents to have access to opportunities.

**7.23** 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**

**7.24** 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.

**7.25** 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.

**7.26** 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.

**7.27** 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**

**7.28** 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.

**7.29** 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.

**7.30** 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.

**7.31** 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.

**7.32** 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**

**7.33** 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.

**7.34** 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.

**7.35** 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**

**7.36** 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**

7.37 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.

7.38 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.

7.39 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**

**7.40** 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.

**7.41** 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**

**7.42** 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.

**7.43** 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**

**7.44** 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.

**7.45** 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**

**7.46** 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.



**7.47** 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**

**7.48** 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**

7.49 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.

**7.50** 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**

**7.51** 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.

7.52 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.

7.53 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**

**7.54** 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.

**7.55** 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.

**7.56** 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.

## B5 associated mitigation

### *Summary of mitigation measures*

**7.57** 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.

7.58 Previous sustainability appraisal work, recommended several changes which would act as mitigation measures to potential negative impacts. There 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

These recommendations are still contained in the Pre-Submission 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 7.2 Mitigation measures

Policy	Possible negative or uncertain effect	Mitigation	Comments
A strong network of sustainable settlements	<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>	East Staffs approach to Sustainable Development	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.
Provision of Homes and Jobs, distribution of housing and employment growth, sue	<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>Integrated Transport Plan for Burton and Uttoxeter</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 the development is completed and adopting most up to date</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>Infrastructure Development 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>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>
Sustainable Urban Extensions	<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</li> </ul>	<p>Flood risk, climate change and water management policy and SFRA</p> <p>Landscape Policy and Planning for</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</p>

	<p>greenfield development</p> <ul style="list-style-type: none"> <li>• Negative effects on landscape due to development taking place on currently undeveloped land</li> <li>• Possible negative effects on biodiversity on SUE's</li> </ul>	<p>Landscape Change SPD</p> <p>East Staffordshire approach to sustainable development Policy</p> <p>Biodiversity and geodiversity Policies</p> <p>Green Infrastructure Policy</p>	<p>uses are not located in flood risk areas. The policy also advocates the deculverting of watercourses which will contribute to 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 8

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**Task B6: Proposing measures to monitor the environmental effects of the plan by detailing the means by which the environmental performance of the plan or programme can be assessed.**

**8.1** Monitoring of the Plan allows the actual significant effects of implementation to be tested against those predicted as part of the sustainability appraisal process and can aid in the future identification of sustainability problems and issues, as well as enabling more accurate predictions of likely effects. Monitoring can also be used to inform the baseline information for future plans.

**8.2** A monitoring plan cannot be finalised until the Local Plan has been adopted. Table 8.1 sets out potential prospective indicators which may help to detect and respond to the significant effects identified in this SA Report. This monitoring framework is revised from that set out in the Interim SA, taking into account responses received and monitoring information from the Local Plan.

**8.3** Upon adoption of the Local Plan indicators will be reported in the Local Authorities Monitoring Report and monitoring will be undertaken regularly. The list of indicators will be reviewed regularly to ensure that the most appropriate indicators are used to measure the effects of the Local Plan. Any changes will be reported and explained through the monitoring report.

**8.4** We would expect the SA and Local Plan monitoring to be complimentary, and where possible similar to ensure robust and focused gathering of information, although, it is acknowledged that the SA monitoring programme contains more environmental indicators

**Table 8.1: Proposed monitoring of significant effects table**

SA Objective	Indicator and target	When will the information be monitored	When action will be taken?	What action will be taken
<p>To provide a suitable mix of decent housing available and affordable to everyone.</p>	<ul style="list-style-type: none"> <li>Number of new homes built, providing an appropriate housing mix (Target: In line with housing trajectory and housing choice SPD)</li> </ul>	<p>Annually by East Staffordshire Borough Council</p>	<p>Significant decrease in number of dwellings being completed</p> <p>Lack of mix of dwellings in applications</p>	<p>Produce sites and allocations document allocating range of smaller sites for residential development.</p> <p>Produce SPD specifying the appropriate mix of housing</p>
	<ul style="list-style-type: none"> <li>Number of new residential developments incorporating high quality layouts and landscaping (target - All)</li> </ul>	<p>Annually by East Staffordshire Borough Council</p>	<p>Applications not meeting most up to date design codes and standards</p>	<p>Produce SPD on high quality design</p>
	<ul style="list-style-type: none"> <li>% of homes meeting Code for Sustainable Homes (target – 100%)</li> </ul>	<p>Annually by East Staffordshire Borough Council</p>	<p>Developments not meeting national sustainability codes</p>	<p>Arrange design workshop for local developers and applicants</p>
	<ul style="list-style-type: none"> <li>% of new housing that is affordable (target *% of new housing that is affordable (target - 30%))</li> </ul>	<p>Annually by East Staffordshire Borough Council</p>	<p>No affordable housing being delivered</p>	<p>Produce SPD specifying the appropriate mix of housing</p> <p>Work in partnership with registered social landlords looking at ways to deliver</p>

SA Objective	Indicator and target	When will the information be monitored	When action will be taken?	What action will be taken
				affordable housing across the housing market
To achieve a prosperous and diverse economy, encourage high and stable levels of employment and sustain economic competitiveness	* Skills base of resident population (target - % of population qualified to degree level and above in line with national average (currently 22%))	Annually – through national monitoring	Loss of employment land or no delivery of new employment land	Investigate ways to boost economic growth across the Borough in Partnership with other departments within the Local Planning Authority  Carry out an employment land review looking at why uses have changed
	*Employment land available (target – in line with Local Plan and Employment Land Review)	Annually – through East Staffordshire Borough Council monitoring	Loss of employment land or no delivery of new employment land	Carry out an employment land review looking at why uses have changed
	* Net additional floorspace provided (target – in line with Local Plan)			
	*Economic activity rate (target – to maintain current level of 65%)	Annually – through national monitoring	Significant decline in economic activity rate and rise in unemployment	Investigate ways to boost economic growth across the Borough in Partnership with other departments within the
	*Unemployment rate (target – to remain below national and regional averages)			

SA Objective	Indicator and target	When will the information be monitored	When action will be taken?	What action will be taken
	*Number of VAT registrations per 1,000 populations			Local Planning Authority
To reduce the need to travel, encourage more sustainable modes of transport and make best use of existing transport infrastructure	* Number of developments in sustainable locations, reducing the need to travel (Target – all)	Annually through East Staffordshire Borough Council annual monitoring	Applications being approved contrary to the development strategy	Consider moratorium on development outside sustainable locations
	* Improved bus service – providing more services to a wider area	Staffordshire County Council monitoring	Reduced bus service in East Staffordshire	Consider reviewing CIL to obtain funds for bus services
To reduce the causes and impacts of climate change, improve air quality, promote energy efficiency and encourage the use of renewable energy	* CO2 emissions per capita (target – continuing decline to national levels)	Annually through DECC	Increased CO2 emissions	Produce climate change SPD
	* Energy consumption (target – in-line with national levels)	Annually through DECC	Increased energy consumption	Produce climate change SPD
	% of electricity produced from renewable sources (target – in-line with national target)	Annually by East Staffordshire Borough Council	No applications for renewable energy sources	Produce climate change SPD Investigate national funding schemes
	% of developments incorporating grey water recycling and rain water harvesting devices (target – in-line with target in Local Plan)	Annually by East Staffordshire Borough Council and SuDs approval board when in	SuDs not being incorporated into developments	Produce climate change SPD

SA Objective	Indicator and target	When will the information be monitored	When action will be taken?	What action will be taken
		place		
	Number and extent of air quality management areas	Annually by East Staffordshire Borough Council	More air quality management areas	Produce Pollution SPD
	NO2 exceedences (target – reduce)	Annually by East Staffordshire Borough Council	Increase in No2 exceedences	Produce Pollution SPD
	Household waste collected per person per year (kg) and % household waste collected which is recycled	Annually by Staffordshire County Council	Increase in waste collection and reduction in waste that is recycled	Produce householder guide on energy efficiency and resource use
	* % of new developments encompassing energy efficient design/layout/features (Target – all new developments)	Annually by East Staffordshire Borough Council – Planning and Building Control records	Developments not incorporating energy efficient design	Produce SPD on high quality design  Arrange design workshop for local developers and applicants
To encourage sustainable design and practice and create a high quality built environment	*Number of developments which include design measures to reduce crime/increase natural surveillance (target – all)	Annually through monitoring of planning and building regulations applications	Applications not meeting national targets	Update design guide to include crime prevention measures and up to date design information on noise mitigation

SA Objective	Indicator and target	When will the information be monitored	When action will be taken?	What action will be taken
	*Number of developments incorporating landscape as a way of reducing potential noise or light impacts (target – all if required)	Through individual planning applications and liaison with environmental enforcement	Schemes not incorporating advice from environmental enforcement	Produce pollution SPD
	*Public concern over noise (target - no increase)	Through East Staffordshire residents surveys	Increase in concerns over noise and light pollution	
	* Public concern over light pollution from residential developments (target - no increase)			
	* Number of developments within town centres incorporating quality landscaping and linkages with the surrounding urban fabric	Through planning application process	No greening schemes being delivered	Project working with NFC and other departments within the Local Planning Authority to identify and deliver schemes
To protect, enhance and provide new Green Infrastructure assets.	* Number of development sites that lead to the creation and enhancement of open spaces (target – all)	Annually – by East Staffs Borough Council and The National Forest Company	No woodland planting or green infrastructure projects delivered	Produce annual action plan to deliver smaller projects or investigate barriers to delivery
	% Green Infrastructure delivered on strategic development sites	Through planning applications	No deliver of green infrastructure	Produce green infrastructure SPD
	Open space lost and not replaced in accordance with policy	Through planning	Open space lost without creation or	Identify areas of open space to be protected in

SA Objective	Indicator and target	When will the information be monitored	When action will be taken?	What action will be taken
		applications	improvement elsewhere	sites and allocations DPD
	Amount of eligible open space managed to 'green flag' award standard.	Annually through East Staffordshire monitoring	Reduction in parks managed to standard	Consider spending CIL funds to improve existing open spaces
	*National forest plantations or contributions as part of development requirements (target – ensure appropriate developments meet target)	Annually by National Forest Company	No plantations delivered or contributions gathered	Review standards and contributions
	* hedgerows, trees and water recreation of natural watercourses through deculverting in new developments (target- optimise where possible)	Through Environment Agency monitoring	No deculverting	Identify areas where deculverting would result in benefits
	*% of residents within 500m (15 minute walk) of public open space (improvements with each development)	Through planning application process	Decline in standard	Review standards and contributions
	Change in priority habitats and species	Staffordshire Wildlife Trust	Decline in species	Consider using CIL to create habitat areas
To sustain the vitality and viability of Burton and Uttoxeter town	* Number of vacant units in town centre (target – reduce current levels)	National monitoring of town centres	Slip in rank of centres	Partnership working to improve opportunities within the town centre



SA Objective	Indicator and target	When will the information be monitored	When action will be taken?	What action will be taken
centres	* Rank of town centres in comparison to others (target - maintain and ultimately improve position in retail ranking)	National monitoring of town centres	Slip in rank of centres	Partnership working to improve opportunities within the town centres
	*Housing development in town centres	Annual monitoring of town centre applications	Sites not being developed for housing	
	*Retail land take up rates (target – to improve current rates)	Annual monitoring of planning applications	Sites not being developed	
	% of completed retail, office and leisure development in town centres	Annually by East Staffordshire Borough Council	No completions	
To sustain vibrant rural communities	*Number of planning permissions for business premises linked to farm diversification in rural areas (target – improve current position)	Annual monitoring of planning applications	No or decrease in applications for affordable housing, rural diversification  Loss community facilities	Work with partners to identify projects which could be funded by CIL
	*re-use of vacant land and buildings for employment purposes in the rural area (target – improve on current position)	Annual monitoring of planning applications	Vacant buildings not being re-used	Review reuse of rural buildings document

SA Objective	Indicator and target	When will the information be monitored	When action will be taken?	What action will be taken
	*Housing delivery for local needs (target – in-line with Local Plan target)	Annual monitoring of planning applications	No housing being delivered	Investigate reasons for non delivery and consider producing sites and allocations document
	* Number of local services and facilities lost to other uses' (Target – No further deterioration)	Annual monitoring of planning applications	Significant loss of facilities	Work with parish councils to identify appropriate uses
To reduce and manage the risk of flooding which would be detrimental to the public well-being, the economy and the environment	*number and types of flooding incidents resulting in damage to property (target – keep to a minimum)	Annually by Environment Agency	No SuDs as part of applications	Update SFRA SuDs guidance
	*number of residential units granted permission contrary to an EA objection (target – zero)	Annually by Environment Agency	Increase in number of applications granted contrary to EA advice	Investigate reasons for permission
	*% of development with Sustainable Urban Drainage Systems (SUDS) (target – all)	Annually by East Staffordshire Borough Council and the SuDs approval board	No SuDs being delivered	Produce Climate Change strategy  Workshop and training for planning officers and agents
	*number of developments within the	Annually by East Staffordshire Borough	Increase in number of applications granted	Investigate reasons for

SA Objective	Indicator and target	When will the information be monitored	When action will be taken?	What action will be taken
	floodplain (target – none)	Council	contrary to EA advice	permission
To deliver more sustainable use of land in more sustainable locations	*Employment land take up rates (target in line with Local Plan target)	Annually by East Staffs Borough Council.	No SuDs as part of applications  Increase in number of applications granted subject to EA advice	Update SFRA  SuDs guidance
	*Percentage of development on previously developed land (target in line with Local Plan)	Annually by East Staffordshire Borough Council	Windfall developments not taking place on brownfield land	Produce sites and allocations DPD  Produce Masterplans for key brownfield sites
	* Area of statutory contaminated land remedied (Where opportunities arise)	As and when applications arise	Land is not contaminated	Work in partnership with other departments of the Council, EA, developers and landowners
	*Number of developments given planning permission contrary to EA advice on the risk of contamination to underlying groundwater (target in line with Local Plan target)	Annually	Increase in developments given permission contrary to advice from EA	Investigate reasons for permission. Work in partnership with EA
To ensure the prudent use of natural resources and the sustainable	*Origins of sand and gravel used in development (target – majority of locally sourced materials used)	Annually by Staffordshire County Council	No locally sourced materials being used	Work in partnership with Staffordshire County Council

SA Objective	Indicator and target	When will the information be monitored	When action will be taken?	What action will be taken
management of existing resources	*Crushed rock used in development (target – in line with Detailed Policy 2)	Annually by Staffordshire County Council	No locally sourced materials being used	Work in partnership with Staffordshire County Council
	*Increase in % of municipal waste recycled (target in line with Waste Local Plan target)	Annually by Staffordshire County Council	No waste being recycled	Work in partnership with Staffordshire County Council
	*Use of 'Forestry Stewardship Council' approved timber in new developments	Annually through planning applications	No locally supplied timber used in development	Work in partnership with The National Forest Company
	Number of developments incorporating water minimisation techniques' (target: In line with Code for Sustainable Homes standards)	Annually through planning applications and building control records	New developments not incorporating water minimisations techniques	Produce Climate Change SPD
	Household water use	Annually by Defra	No reduction in household water use	Produce Climate Change SPD
To improve the quality of life, including the health, safety and well being of those living and working in the Borough.	*Reduction in health inequalities (target – to reduce the number of SOAs deprived in the IMD)	National monitoring	No reduction in health inequalities	Work with partners to identify projects related to health which could be delivered through CIL
	*Life expectancy (target – for life expectancy to continue increasing on a par with national and regional	National monitoring	Life expectancy not in line with regional and national average	Work with partners to identify projects related to health which could be

SA Objective	Indicator and target	When will the information be monitored	When action will be taken?	What action will be taken
	averages)			delivered through CIL
	* Reduction in overall British Crime Survey comparator recorded crime	National monitoring	Increase in crime	Update design SPD
	* % of residents who say they feel safe in the Borough	In line with East Staffordshire Joint Strategic Needs surveys	Reduction in residents who say they feel safe	Update design SPD. Partnership working with other departments in the authority
	*Number of new developments incorporating crime prevention design measures (target – all)	Annually through planning applications	Developments not incorporating crime prevention measures	Update design SPD
	* Number of residences exposed to noise above 55dBA (target – none)	Annually through environmental health department monitoring	Increase in number of residences exposed to noise above recommended level	Update design SPD
To protect, maintain and enhance the character and appearance of the landscape and townscape quality, maintaining and strengthening local distinctiveness and sense of place.	*Landscape character and townscape quality of the borough (target - to maintain and enhance a high standard)	In line with Staffordshire County Council landscape work	Loss of historic environment features	Review Design SPD
	*Loss of historic landscape features, erosion of character and distinctiveness (target – minimise loss)	Annually through planning application process		Training of officers
	*Improvements in the quality of the townscape (target – improvements	In line with design reviews		Design workshops for applicants

SA Objective	Indicator and target	When will the information be monitored	When action will be taken?	What action will be taken
	made year on year)			
To promote biodiversity and geodiversity through protection, enhancement and management of species and habitats	*Number of hectares of Local Nature Reserves (target – maintain current levels)	Annually by East Staffs in partnership with Staffordshire Wildlife Trust and Natural England	No habitats created Loss of habitats Loss of BAP species No improvement in terms of water quality No Suds as part of applications	Produce SPD Review planning application criteria
	*Number and type of internationally/nationally designated sites (target – maintain current levels)	In line with Natural England monitoring	No increase in sites within 5 years of the plan	Consider investigating potential sites in partnership with NFC, Natural England and Staffordshire Wildlife Trust
	*number of species relevant to the Borough which have achieved SBAP targets (target – in-line with current SBAP targets)	In line with Staffordshire Wildlife Trust monitoring	Targets not being achieved	Consider producing standing advice for applicants and land owners in partnership with Staffordshire Wildlife Trust
	*Number of developments that may affect biodiversity conservation value (Target – none)	Annually as part of planning application process	Developments affecting biodiversity conservation value	

SA Objective	Indicator and target	When will the information be monitored	When action will be taken?	What action will be taken
	*Number of developments that may affect features of geological conservation value (Target – none)		sites without mitigation or enhancement measures	
	*Number of development sites that lead to the creation and enhancement of open spaces (target – all)	Annually as part of planning application process	No creation or enhancement measures being provided	Produce Green Infrastructure and open space SPD
	* Number of Waterbodies meeting WFD target' (Target: All in Borough)	Environment Agency monitoring of river quality	No improvements in the quality of waterbodies	Produce guidance note in partnership with EA and SCC
To protect and enhance water quality of the Borough's rivers whilst maximising their carrying capacity through achieving sustainable water resource management.	*number of developments that increase water consumption or pollution (target – none)	In line with building control records monitoring	No water saving measures incorporated into developments	Produce climate change SPD
	*Quality of rivers, canals and freshwater bodies within the Borough (target – maintain and improve current levels)	Environment Agency monitoring of river quality	No improvements in the quality of waterbodies	Produce guidance note in partnership with EA and SCC
	*Number of new developments incorporating SuDS and other water saving techniques (target – all)	Annually through planning application and building control process	No SuDS or water saving measures incorporated into developments	Produce climate change SPD including section on SuDS in partnership with EA and SCC
	*Number of developments given planning permission contrary to EA advice based on an unacceptable risk	Annually by EA	Planning permissions granted contrary to	Investigate reasons for permission.



SA Objective	Indicator and target	When will the information be monitored	When action will be taken?	What action will be taken
	of contamination to 'Controlled Waters' (target – none)		advice from EA	Partnership working with EA
	*Number of developer contributions targeting improvements to education, interpretation and access to waterways	Annually through planning applications	Appropriate developments not contributing to schemes	Partnership working and CIL 123 list to be amended to ensure appropriate delivery of such schemes
	* Number of Waterbodies meeting WFD target' (Target: All in Borough)	Environment Agency monitoring of river quality	No improvements in the quality of waterbodies	Produce guidance note in partnership with EA and SCC
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).	*Number of conservation areas with an up to date character appraisal	Annually by East Staffordshire Borough Council	No up to date appraisals	Produce action plan for conservation area appraisals
	*Number of listed buildings on the 'Historic Buildings at Risk' register (target – reduce current levels)	Annually by English Heritage	Increase in assets at risk	Partnership working with land owners and English heritage to improve condition
	*Number of historic and archaeological sites, features and areas with improved management	Annually by East Staffordshire Council through planning application process	No areas with improved management	Produce Historic environment SPD and guidance.  Partnership working with SCC and English Heritage

SA Objective	Indicator and target	When will the information be monitored	When action will be taken?	What action will be taken
	*Number of historic assets providing greater understanding, enjoyment and access (target – increase year on year)	In line with relevant planning applications and English heritage and National Trust monitoring	No new schemes	Partnership working with land owners and English heritage
	*Number or % of area of historic buildings, sites and areas and their settings (both designated and non designated) damaged (target – none)	In line with English Heritage monitoring	Increase in damaged areas	Partnership working with land owners and English heritage to improve condition
	Number and extent of Conservation Areas	Annually	No increase in Conservation Areas over the plan period	Investigate additional conservation areas

# Chapter 9

## Conclusions and Next Steps

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**9.1** The Sustainability Appraisal Report attempts to predict the likely effects, both positive and negative, that the delivery of the Local Plan will have on the social, environmental and economic character of the Borough.

**9.2** The Sustainability Appraisal Report has appraised the Plan Objectives, Development Strategy, Strategic Sites and Planning Policies set out in the Pre-Submission Local Plan. The SA Report also includes an appraisal of alternative strategies and alternative strategic sites.

**9.3** Overall it is considered that the Local Plan is based on the most sustainable strategy with many positive effects.

**9.4** There are several negative effects associated with growth, however the implementation of many of the planning policies will mitigate against possible negative effects.

**9.5** The main likely significant effects of the Local Plan overall and responding to the key sustainability issues identified in the Borough, which are outlined in the Scoping Report and Appendix B, 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 open space, greenspaces and growing spaces including the health of communities and the benefits to wildlife through habitat creation, management and enhancement
- Substantial 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, reducing the amount of greenfield land developed where possible and improving the quality of the existing built environment
- Potential increases in the proportion of waste reused and recycled
- Significantly reduced reliance upon the car coupled with strong promotion of sustainable transport modes (e.g. walking, cycling and public transport)

**9.6** When considered as a whole the policy framework in the Local Plan meets each of the SA objectives. When considering the cumulative impact of the policy framework there are policy objectives that will pull against each other.

**9.7** Overall the cumulative impact of the policies working in combination 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.

**9.8** There will be some negative effects on the environment (for example countryside, soil conservation, biodiversity and geodiversity, water) as a result of development being proposed on greenfield sites on the edge of the existing settlements, in both urban and rural locations. A large proportion of the spatial strategy will require greenfield development due to the limited supply of deliverable brownfield sites available. As such, greenfield sites will result in development in the countryside. 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, optimising brownfield sites where opportunities exist and well designed communities that fit into their surroundings. 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, bus stops and amenity and play areas. In particular the delivery of employment sites within 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.

**9.9** Following consultation on the Local Plan Preferred Option document and its associated Interim Sustainability Appraisal (July –September 2012), the Council considered the comments received on both documents to inform this stage of plan production.

### The Difference made by this Appraisal

**9.10** The SA has contributed to plan development by providing an independent assessment of the sustainability of:

- Plan Objectives
- Various spatial options;
- The Council's Preferred Strategy;
- Strategic sites; and
- Policy implementation.

**9.11** The process has therefore provided an initial check on the sustainability of the Local Plan Pre-Submission as envisaged by government guidance. The assessment identifies likely effects, which will require further investigation in response to planning applications (i.e. on a site-by-site basis).

**9.12** An additional benefit of the process is that lessons learned during the SA of the Local Plan Pre-Submission can inform the SA of other planning documents such as Supplementary Planning Documents.

**9.13** The ultimate effectiveness of the Local Plan from the point of view of sustainable development will depend on an effective partnership between East Staffordshire Borough Council, prospective developers and the community at large.

## **How to Comment**

**9.14** This document is out for consultation in conjunction with the Local Plan Pre-Submission Development Plan Document. Comments on this Sustainability Appraisal Report are welcomed, and will be taken into account as part of the Local Plan examination. Comments can be submitted on-line via the Council's website [East Staffordshire Borough Council - Consultation Home](#), or written comments can be made. Comments should be received by 12:00pm on Friday 29<sup>th</sup> November 2013. If you have any questions or queries on this report, please contact:

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## **What we will do with your comments**

**9.15** Following consultation, all representations received will be acknowledged and made available for examination. Therefore, all representations received on the Local Plan and SA Report become public documents and cannot be kept confidential. All information collected will be used only to inform our decisions in the progression of the Local Plan. A statement will be prepared outlining the main issues raised in the representations received, which will be available for public viewing.