



Staffordshire Moorlands Local Plan

Sustainability Appraisal

Post Adoption Statement
September 2020

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Introduction

1 Introduction

1.1 Staffordshire Moorlands District Council adopted the Staffordshire Moorlands Local Plan on the 9th September 2020. This statement is the final output of the Sustainability Appraisal (SA) and its incorporated Strategic Environmental Assessment (SEA) process.

1.2 Under Section 19 of the Planning and Compulsory Purchase Act 2004, the Council is required to undertake a SA of the Local Plan. This process involves examining the likely effects of the plan and considering how they contribute to the environmental, social and economic well-being of the plan area. The SA must also satisfy the requirements for a SEA arising from the Council's obligations under the European Directive on SEA⁽¹⁾ and the implementing Regulations⁽²⁾. This process commenced in 2014 and has been carried out as an iterative and ongoing process undertaken alongside, and informing, the preparation of the Local Plan.

1.3 The SEA and SA processes are undertaken together as a combined process, one which is advocated in National Planning Practice Guidance. It recommends SA and SEA be undertaken as a combined process to assess social, economic and environmental effects and accords with the following legislative requirements:

- Planning and Compulsory Purchase Act 2004;
- Town and Country Planning (Local Planning) (England) Regulations 2012;
- EU Directive 2001/42/EC (SEA Directive);
- The Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations); and
- National Planning Policy Framework 2019 (Paragraph 32).

1.4 As the Local Plan evolved, it was accompanied by an iteration of the SA Report. The list of documents that comprise the final SA statement are:

- SA Scoping Report, August 2014
- Initial Sustainability Report Local Plan Options Sites and Boundaries, April 2016
- Draft SA Report Preferred Options Local Plan, July 2017
- SA Report Submission Version Local Plan published for receipt of representations, February 2018
- SA Report Submission Version Local Plan, June 2018
- SA Report Biddulph Options, June 2019
- SA of SMDC Local Plan proposed Main Modifications, September 2019

The Post Adoption Statement

1.5 Regulation 16 (4) of the SEA Regulations identifies that on adoption of the plan a statement must be produced summarising:

- How environmental considerations have been integrated into the plan or programme; (see section 2)
- How the environmental report has been taken into account; (see section 3)
- How opinions expressed in response to:

1 Directive 2001/42/EC on the Assessment of the Effects of Certain Plans and Programmes on the Environment
2 The Environmental Assessment of Plans and Programmes Regulations 2004

- The invitation referred to in Regulation 13(2)(d);
- Action taken by the responsible authority in accordance with Regulation 13(4), have been taken into account; (see section 4)

- How the results of any consultations entered into under Regulation 14(4) have been taken into account; (see section 4)
- The reasons for choosing the plan or programme as adopted, in light of the other reasonable alternatives dealt with; (see section 5) and
- The measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme (see section 6).

How environmental considerations have been integrated into the Local Plan

2 How environmental considerations have been integrated into the Local Plan

2.1 The purpose of the SA was to assist the Council in preparing the Local Plan by identifying the key sustainability/environmental issues facing the plan area, to predict what would be the likely effects of the Local Plan on these issues, and to put forward recommendations to improve the Local Plan.

2.2 The SA was undertaken iteratively, such that at each stage of the Local Plan's preparation an assessment of the sustainability and environmental effects of the options for the Local Plan and subsequently its policies were made. SA reports were produced to describe the approach taken, identify the likely effects, and put forward recommendations to avoid or minimise negative effects identified or to enhance potential positive effects. In this way, environmental and sustainability considerations were integrated into the Local Plan as it was developed. The table below sets out the key stages of the SA and links to the Local Plan preparation process.

Stage	Date	Link to Plan Preparation	Integration of Environmental Considerations
SA Scoping Report	August 2014	Prepared alongside preparation and review of the evidence base. Published for consultation between 13 August 2014 & 26 September 2014.	Relevant plans and programmes identified. Baseline established. Sustainability issues identified. Sustainability Framework set out: including deciding on the scope of the appraisal, defining objectives and indicators.
Initial Sustainability Appraisal Report	April 2016	Prepared alongside the Local Plan: Preferred Options Sites and Boundaries. Published for consultation between 28 April & 13 June 2016.	Provision of background and context for the consultation. Assisted the selection of preferred options. Recommended how options could be improved, including through mitigation measures.

Stage	Date	Link to Plan Preparation	Integration of Environmental Considerations
Draft SA Report	July 2017	Prepared alongside the Preferred Options Local Plan July 2017. Consultation on both documents took place at the same time between 31 July & 22 September 2017.	<p>Effects (economic, social & environmental) of alternative development requirements, policies and site allocations were appraised against the Sustainability Framework.</p> <p>Significant changes to the plan arising from consultation undertaken at Preferred Options Sites and Boundaries Stage were appraised.</p> <p>Recommended how the options could be improved, including through mitigation measures.</p> <p>Proposals for monitoring the plan were developed.</p>
SA Report Submission Version Local Plan	February 2018	Prepared alongside the Local Plan Submission Version February 2018. Consultation on both documents took place at the same time between 27 February & 11 April 2018.	<p>Significant changes to the plan arising out of latest evidence and consultation undertaken at Preferred Options Stage were appraised.</p> <p>Changes were made to the plan as a result of the SA.</p> <p>Key elements of the Scoping Report were integrated.</p>

Stage	Date	Link to Plan Preparation	Integration of Environmental Considerations
			Non-technical summary was prepared.
Final Sustainability Appraisal report.	June 2018	Submitted alongside the Staffordshire Moorlands Local Plan for Examination.	The SA was used as part of determining the robustness of the Plan.
Initial SA Addendum Report Biddulph Options	June 2019	Prepared alongside modifications to the plan. Consultation took place at the same time as the proposed Main Modifications (see below).	The likely significant effects associated with alternative development approaches were appraised. This was used to inform continuing plan preparation.
SA of Local Plan Main Modifications	September 2019	Prepared alongside the proposed Main Modifications. Consultation took place at the same time as the proposed Main Modifications between 18th September and 31st October 2019.	The potential social, environmental and economic effects of main modifications to the Local Plan were fully assessed for significant sustainability impacts and reported on as part of the plan making process.

Table 2.1 Integration of the Sustainability Appraisal with Local Plan preparation

SA Framework, Objectives and Indicators

2.3 The way in which the environmental and sustainability effects of the Local Plan were described, analysed and compared was through the use of a set of SA objectives. The SA objectives and indicators in the table below were developed at the Scoping Stage of the appraisal and were revised in the light of consultation responses received during the period of public consultation. The table below sets out the SA Framework used in the appraisals. This SA Framework was the main tool used at each stage of the SA for assessing the likely effects of the options and policies for the Local Plan.

Objective	SEA Topic	Decision making criteria	Indicator
SOCIAL			
Population, Human Health and Social Inclusiveness			
1. To improve community cohesion and the quality of where people work and live.	Population and Human Health	<ul style="list-style-type: none"> ● Will it make a positive contribution towards community cohesion? ● Will it improve neighbourhood quality? ● Will it ensure that there is adequate open space and support Green infrastructure? ● Will it minimise light and noise pollution? ● Will it ensure that occupiers of buildings and spaces have sufficient natural light and appropriate levels of privacy? 	<ul style="list-style-type: none"> ● Area of open space. (SMDC, Annual Monitoring Report)
2. To advance equality of opportunity between all persons and eliminate social exclusion by improving access to jobs, services and facilities.	Population and Human Health	<ul style="list-style-type: none"> ● Will it remove or minimise any disadvantages suffered by people due to their age, disability, gender reassignment, marriage / civil partnership, pregnancy / maternity, race, religion / belief, sex and sexual orientation? ● Will it help to minimise the distance people need to travel to access education, employment, shopping and other key services and facilities. 	<ul style="list-style-type: none"> ● Job Seekers Allowance Claimant Count Aged 18 – 24 (nomisweb) ● Incidents of crime per 1,000 Population ● Fear of Crime (Office for National Statistics) ● Number of affordable houses completed ● % of new residential development completed within Towns / Large Villages/ Small Villages/ Other Rural Areas (SMDC) ● Number of school places created (School Organisation Team, SCC)
3. To improve health and reduce health inequalities.	Population and Human Health	<ul style="list-style-type: none"> ● Will it improve health or access to health facilities? ● Will it promote healthy lifestyles? ● Will it reduce health inequalities? ● Will it provide opportunities to participate in leisure and recreational activities including access to the countryside? 	<ul style="list-style-type: none"> ● Life expectancy (Public Health England) ● Adult Obesity (Public Health England) ● Adult participation in sport (Sport England Active People Data)
4. To minimise opportunities for crime and reduce the fear of crime.	Population and Human Health	<ul style="list-style-type: none"> ● Will it reduce actual levels of crime? ● Will it reduce fear of crime? 	<ul style="list-style-type: none"> ● Incidents of crime per 1,000 Population ● Fear of Crime (Office for National Statistics)
5. To ensure adequate quality and provision of a range of house types to meet	Population and Human Health	<ul style="list-style-type: none"> ● Will it provide an appropriate mix of housing to enable all needs to be met? 	<ul style="list-style-type: none"> ● Number of affordable houses completed

Objective	SEA Topic	Decision making criteria	Indicator
local needs in appropriate locations and including affordable / social /extra care housing.		<ul style="list-style-type: none"> Will it enable people to meet their needs within their existing communities? Will it ensure that people can afford their housing? 	<ul style="list-style-type: none"> No of years supply of deliverable housing sites (SMDC, Annual Monitoring Report) No of extra care units delivered (SCC)
6. To strengthen links between rural areas and towns by sustainable forms of transport and reduce the number of journeys made by car.	Population and Human Health	<ul style="list-style-type: none"> Will it minimise impacts on existing traffic congestion? Will it support the use of public transport? Will it support safe walking and cycling? Will it protect and improve access to the natural environment and support Green Infrastructure? 	<ul style="list-style-type: none"> Frequency of bus service (by settlement) (Staffordshire County Council) % of new residential development completed within Towns / Large Villages/ Small Villages/ Other Rural Areas (SMDC)
ENVIRONMENTAL			
Climate Change, Air and Water			
7. To minimise contributions to climate change and consider climate change adaptation.	Air and Climatic Factors	<ul style="list-style-type: none"> Will it reduce emissions of greenhouse gases particularly CO₂? Will it increase energy efficiency? Will it increase the use of renewable energy? Will it ensure new development is in accessible locations in order to reduce the need for car use and / or encourage sustainable forms of transport? 	<ul style="list-style-type: none"> % of new residential development completed within Towns / Large Villages/ Small Villages/ Other Rural Areas (SMDC) CO₂ total emissions (National Atmospheric Emissions Inventory) Amount of renewable energy generation by installed capacity and type (SMDC, Annual Monitoring Report)
8. To improve air quality.	Air	<ul style="list-style-type: none"> Will it minimise emissions of airborne pollutants? Will it maximise the removal of air pollutants (e.g. by trees)? 	<ul style="list-style-type: none"> CO₂ total emissions (National Atmospheric Emissions Inventory)
9. To reduce flood risk, protect and enhance water sources.	Water	<ul style="list-style-type: none"> Is new development directed towards areas of least flood risk? Will it reduce risk of flooding eg by encouraging the integration of mitigation measures such as SuDs into new development? Will it protect, maintain and improve the quality of water resources and help contribute to the objectives of the Water Framework Directive? Will it encourage water efficiency and demand management? 	<ul style="list-style-type: none"> Number of planning applications granted contrary to the advice of the EA in respect of flood risk. Number of planning applications granted contrary to the advice of the EA in respect of water quality. (Environment Agency)
Biodiversity, Flora and Fauna			

Objective	SEA Topic	Decision making criteria	Indicator
10. To identify, conserve and enhance biodiversity resources and to test the plan's policies and proposals on European Sites and SSSIs	Biodiversity, Flora and Fauna	<ul style="list-style-type: none"> Will it protect and promote effective management of the district's sites of ecological and nature conservation importance? Will it help contribute to Staffordshire Biodiversity Action Plan objectives? Will it help deliver networks of biodiversity and green infrastructure? 	<ul style="list-style-type: none"> Area (ha) of UK priority habitats by type. (Staffordshire Ecological Record) % of designated sites brought into favourable condition (DEFRA) % of new developments incorporating ecological enhancement measures per year
Soil and Material Assets			
11. To safeguard the best and most versatile agricultural land; improve soil and land resources; and protect and enhance geological resources.	Soil	<ul style="list-style-type: none"> Will it safeguard the best and most versatile agricultural land? Will it minimise the loss of greenfield land? Will it reduce land contamination / instability? Will it reduce the amount of derelict land? Will it protect notable geological and geomorphological features? 	<ul style="list-style-type: none"> % of development built on brownfield sites (SMDC, Annual Monitoring Report) Area of Regionally Important Geological Sites (RIGS) (Staffordshire Ecological Record)
12. To minimise the use of non-renewable resources.	Material Assets	<ul style="list-style-type: none"> Will it reduce waste generation? Will it maximise the re-use of existing buildings? Will it increase the use of building materials from sustainable sources? 	<ul style="list-style-type: none"> Residual household Waste (kg/hh) % of household waste reused, recycled or composted (recycle for Staffordshire.org)
Built and Cultural Heritage, Landscape and Local Distinctiveness			
13. To protect and enhance the character of towns / villages and other heritage and archaeological assets along with their settings.	Cultural Heritage	<ul style="list-style-type: none"> Will it ensure the continued protection and enhancement of cultural and historic heritage assets (designated and non-designated assets) along with their settings? Will it protect and reinforce the character and appearance of the district's towns and villages and maintain and strengthen local distinctiveness and sense of place? 	<ul style="list-style-type: none"> Number of major development projects that affect the significance of heritage assets or historic landscape character whether in an adverse or beneficial way (SMDC, Annual Monitoring Report)

Objective	SEA Topic	Decision making criteria	Indicator
14. To protect and enhance the character and appearance of the landscape including historic landscape and other natural assets and resources.	Cultural Heritage and Landscape	<ul style="list-style-type: none"> Will it protect and enhance the character of the landscape and maintain and strengthen local distinctiveness? Will it promote development on brownfield land? Will it safeguard protected sites and provide opportunities for the enhancement of the natural environment identified in the NCA profiles? 	<ul style="list-style-type: none"> % of new dwellings on previously developed land (SMDC, Annual Monitoring Report) % of new employment on previously developed land (SMDC, Annual Monitoring Report)
15. To encourage further development of sustainable tourism, cultural heritage and local distinctiveness.	Cultural Heritage	<ul style="list-style-type: none"> Will it support the development of a vibrant cultural economy and local distinctiveness? Does it help support tourism and the visitor economy? 	<ul style="list-style-type: none"> Percentage of visitors staying overnight (STEAM report)
ECONOMIC			
Employment, Economic Development and Regeneration			
16. To safeguard the vitality and viability of the District's towns and villages, and create and sustain a vibrant rural economy	N/A	<ul style="list-style-type: none"> Will it safeguard shops and services in existing centres? Will it safeguard and improve the retail, leisure and service provision? 	<ul style="list-style-type: none"> Retail vacancy rates (%) Retail A1 completions (m²) (SMDC, Annual Monitoring Report)
17. To strengthen, modernise and diversify the District economy, and promote sustainable economic growth	N/A	<ul style="list-style-type: none"> Will it provide a balanced portfolio of employment land in sustainable locations? Will it provide opportunities for the creation of new businesses and/or minimise the loss or displacement of existing businesses? 	<ul style="list-style-type: none"> Employment land supply SMDC, Annual Monitoring Report Enterprise births and deaths (Business Demography, ONS)
18. To encourage and support a high and stable level of employment	N/A	<ul style="list-style-type: none"> Will it meet the employment needs of local people? Will it increase economic activity levels? Will it improve physical accessibility to jobs? Will it support higher income levels for local residents? 	<ul style="list-style-type: none"> Unemployment rates % of population economically active Earnings by residence and workplace (Nomisweb)

Table 2.2 SA Objectives and Indicators

Habitats Regulations Assessment

2.4 The Local Plan was also required to be subject to a Habitats Regulations Assessment (HRA) under the Conservation of Habitats and Species (Amendment) Regulations 2012. The purpose of the HRA was to assess the impacts of a land-use plan against the conservation objectives of a European designated site for nature conservation and to ascertain whether it would adversely affect the integrity of that site. The HRA process for the Staffordshire Moorlands Local Plan was undertaken separately from the SA but the findings of the HRA Reports informed the SA process where possible.

2.5 In March 2016 the District Council commissioned an initial HRA screening exercise for the Local Plan. An updated HRA screening of the preferred option policies (to take account of changes since November 2016) and the proposed preferred option development site allocations were screened between 15th and 27th June 2017. Consultation on the 2017 HRA Report took place alongside consultation on the draft SA Report and the Staffordshire Moorlands Local Plan - preferred options July 2017.

2.6 Further HRA work was undertaken between December 2017 and January 2018 to provide an In Combination Effects assessment in relation to traffic and air quality. In addition changes to Preferred Option Policies were screened in order to identify any likely significant effects. As a result of this additional work, an updated HRA Report was published alongside the publication of the Submission version of the Staffordshire Moorlands Local Plan in February 2018. An addendum was prepared in June 2018 to acknowledge the support of Natural England for the conclusions of the February 2018 HRA report and to confirm the Council's view that the HRA is legally compliant in the light of the judgement issued by the Court of Justice of the European Union on 12th April 2018 (People over wind).

How the environmental report has been taken into account

3 How the environmental report has been taken into account

3.1 As previously stated Sustainability Appraisal is an iterative and on-going process that was undertaken at each stage of the Local Plan, helping to influence its development. SA findings and recommendations were taken into account to inform the evolution of the emerging Plan and policies.

3.2 With respect to the SA of site options, the SA findings were included in site proformas, so that the information could be taken into account as the Council considered which sites to take forward into the Submission Version of the Plan. These were included within the Site Allocations Topic Papers for Leek, Biddulph, Cheadle and the Rural Areas (Examination Documents 13.1 to 13.4)

Changes made to the Local Plan as a result of the SA

3.3 Specific changes were made to the Local Plan as a result of recommendations from the SA. These were to help reduce or avoid potential adverse effects and maximise the beneficial effects of the plan. The changes were:

- SS1 Development principles: Policy amended to support development which secures high quality sustainable environments, efficient and effective use of resources and contributes effectively to tackling climate change and reduced carbon emissions.
- SS5 Leek Area Strategy: Policy amended to include a reference to the District's GI Strategy.
- SS6 Biddulph Area Strategy: Policy amended to include a reference to the District's GI Strategy.
- SS7 Cheadle Area Strategy: Policy amended to include a reference to the District's GI Strategy.
- SS8 Larger Villages Areas Strategy: Inclusion of a new bullet point at Point 4 to support the implementation of the GI Strategy and Local Green Spaces.
- SS9 Smaller Villages Areas Strategy: Inclusion of a new bullet point at Point 1 to support the implementation of the GI Strategy and Local Green Spaces.
- SD5 Flood Risk: Policy amended to clarify that where a watercourse is present on a development site, it should be retained or restored into a natural state and enhanced where possible.
- DC1 Design Considerations: Additional bullet point (8) added to include a requirement for developments to be well integrated for car, pedestrian and cycle use as well as other sustainable transport links.
- DC3 Landscape and Settlement Setting: Additional bullet point (3) added to include support for development which maintains the biodiversity qualities of any natural or man-made features within the landscape, such as trees, woodlands, hedgerows, walls, watercourses or ponds.
- NE2 Trees, Woodland and Hedgerows: This is a new policy included in the Plan as a result of feedback from the SA.

- DSC1 Cheadle North Strategic Development Area: Inclusion of the bullet point requiring a master plan to consider how to manage the impact of growth on the Cecilly Brook Local Nature Reserve and Green Infrastructure Network to ensure that Local Plan policy requirements can be met for minimising impacts on biodiversity (and providing net gains in biodiversity where possible); and establishing coherent ecological networks that are more resilient to current and future pressures; as well as enabling water quality improvements in line with the Water Framework Directive objectives.
- DSC2 Cecilly Brook Strategic Development Area: Inclusion of the bullet point requiring a master plan to consider how to manage the impact of growth on the Cecilly Brook Local Nature Reserve and Green Infrastructure Network to ensure that Local Plan policy requirements can be met for minimising impacts on biodiversity (and providing net gains in biodiversity where possible); and establishing coherent ecological networks that are more resilient to current and future pressures; as well as enabling water quality improvements in line with the Water Framework Directive objectives.
- Table 10.1 Monitoring Indicators: To ensure monitoring covered the significant environmental, economic and social effects of implementing the Local Plan, an additional indicator was added: Net additional dwellings for each year over plan period.

Changes made to the Plan as a result of the HRA

3.4 The Appropriate Assessment stage of the HRA was undertaken to evaluate the potential for the 'screened in' Local Plan policies to result in adverse effects on the European sites (see Section 2 of this report for more details) . The following mitigation measures were also included within the Local Plan in order to avoid potential adverse effects in relation to:

- the proposed allocation at Waterhouses (WA004). In order to avoid adverse effects on European sites from occurring as a result of the proposed allocation, it was recommended that the following text should be added to the first bullet of Local Plan Policy NE1 Biodiversity and Geological Resources: "*Any development with a potential to adversely affect a European site/s through construction activities should ensure that Ciria construction guidelines are followed including environmental good practice on control of dust and water pollution.*"
- Policies SS8 Larger Villages Area Strategy and SS9 Smaller Villages Area Strategy. In order to avoid adverse effects on European sites from occurring as a result of Policies SS8 and SS9, it was recommended that wording similar to that included in Local Plan Policy SS10 Other Rural Areas Strategy was added to both policies SS8 and SS9, as follows:

"Any development proposal that might have the potential to affect a European or Ramsar Site must itself be subject to appropriate assessment."

How opinions expressed during consultation on the SA reports have been taken into account

4 How opinions expressed during consultation on the SA reports have been taken into account

4.1 Consultation with the public, stakeholders and the SEA bodies on the SA Scoping, Initial and Draft SA reports, SA Report Submission Version Local Plan, Initial Addendum SA Report Biddulph Options and SA of the Main Modifications was carried out alongside consultation on the emerging Local Plan as described in Section 2.

4.2 The decision making process has taken account of consultees' opinions on the Local Plan and the accompanying environmental (sustainability appraisal) report throughout the plan making process.

SA Scoping Report August 2014

4.3 The SA Scoping Report was consulted on for six weeks between 13th August 2014 and 26th September 2014. Details of the consultation responses received and the Council's actions in the light of responses are detailed in Section 14 of the Final SA Report (June 2018). Representations were received from:

- Environment Agency
- Natural England
- English Heritage
- Staffordshire County Council
- Staffordshire Police
- United Utilities

4.4 Responses to the consultation were incorporated into further iterations of the SA report or were used to amend the approach taken to the appraisal as appropriate and wherever possible.

Initial SA Report April 2016

4.5 The Initial SA Report was consulted on alongside the Staffordshire Moorlands Local Plan Preferred Options Sites and Boundaries April 2016.

4.6 Consultation arrangements included:

- Direct correspondence with SEA bodies.
- Over 5,000 e-mails and 8,000 postcards sent to consultees on the Staffordshire Moorlands consultation database.
- A dedicated web-page on the Staffordshire Moorlands web-site.
- Promotion of the Local Plan consultation and drop in sessions through social media.
- Press notices and releases in local papers.
- Postcards delivered to all residents within SMDC – 48,000 and all Businesses in SMDC – 3,000.
- Site notice at each proposed site allocation within the Local Plan.
- Consultation material available in key public locations.
- Public meetings and drop-in sessions.

4.7 A total of 45 representations were received from 16 respondents. A summary of the representations received and the Council's actions in the light of responses are detailed in Section 14 of the Final SA Report (June 2018). Representations were received from:

- Natural England
- Historic England
- Environment Agency
- JMW Planning Limited
- Draycott Parish Council
- Individuals

4.8 Responses received to the April 2016 consultation were incorporated into the SA report, or used to amend the approach taken to the appraisal wherever possible.

Draft SA Report July 2017

4.9 A draft SA report was consulted on alongside the Staffordshire Moorlands Preferred Options Local Plan (July 2017) for an eight week period between Monday 31st July and Friday 22nd September.

4.10 Consultation arrangements included:

- Direct correspondence with SEA bodies.
- Approximately 5,000 e-mails and 8,000 postcards sent to consultees on the Staffordshire Moorlands consultation database.
- A dedicated web-page on the Staffordshire Moorlands web-site.
- Promotion of the Local Plan consultation and drop in sessions through social media.
- Press notices and releases in local papers.
- Postcards delivered to all residents within SMDC – 48,000 and all Businesses in SMDC – 3,000.
- Site notice at each proposed site allocation within the Local Plan.
- Consultation material available in key public locations.
- Public meetings and drop-in sessions.

4.11 A total of 65 representations were received from 23 respondents. A summary of the representations received and the Council's actions in the light of responses are detailed in Section 14 of the Final SA Report (June 2018). Representations were received from:

- Historic England
- Natural England
- Environment Agency
- Staffordshire County Council
- Derbyshire County Council
- Knights LLP
- Hill Dickinson for Fradley Estates
- Harlequin Development Strategies Ltd
- Individuals

4.12 Responses to the consultation were incorporated into further iterations of the SA report or were used to amend the approach taken to the appraisal as appropriate and wherever possible.

SA Report Submission Version February 2018

4.13 A SA report (February 2018) was consulted on alongside the Staffordshire Moorlands Submission version Local Plan published for a six week period between 27th February and 11th April 2018.

4.14 The Council invited 12,894 contacts on the consultation database to submit representations (8,997 letters and 3,897 emails).

4.15 Publicity arrangements also included:

- Direct correspondence with SEA bodies.
- Paper copies of the consultation materials made available at all libraries and Council offices in the District.
- A dedicated web-page on the Staffordshire Moorlands web-site.
- Press notices and releases in local papers, as well as promotion through social media.

4.16 A total of 70 representations to the SA report were received from 22 respondents. Details of the consultation responses received and the Council's actions in the light of responses are detailed in Section 14 of the Final SA Report (June 2018). Representations were received from:

- Historic England
- Derbyshire County Council
- RPS Planning and Development
- Renew Land Development Ltd
- Fradley Estates
- Seabridge Developments
- Harlequin Development Strategies
- Knights LLP
- JMW Planning
- Ken Wainman Associates
- Individuals

4.17 The Council noted all representations received to the SA Report and welcomed the support for the process where appropriate. The following actions were taken in response to the specific issues raised on the SA report during the period of publication of the Local Plan:

- To ensure monitoring covered the significant environmental, economic and social effects of implementing the Local Plan, an additional indicator was added to Local Plan Table 10.1: Net additional dwellings for each year over plan period.
- To ensure the Council's latest evidence was reflected in the summaries of the appraisals of development site options (within SA section 5.3), the report was updated to include findings from the Council's evidence base report: Landscape, Local Green Space and Heritage Impact Study: Assessment of additional sites; October 2017. This additional

evidence was added to the site summary sections for LE102 (Bank Farm), BD104 (Land Between Meadows Way and Tunstall Road) and BDNEW (West of Biddulph Valley Way / East of Woodside Farm).

- To ensure the Council's latest evidence was reflected in the summaries of the appraisals of development site options (within SA section 5.3), the report was updated to include findings from the Council's ecological evidence base: SMDC Additional Sites – LWS Assessments; November 2017. This additional evidence was added to the site summary sections for BDNEW, BD104, LE102, LE128b and EN128.
- To ensure the Council's latest evidence was reflected in the summaries of the appraisals of development site options (within SA section 5.3), the report was updated to include findings from the Council's Wardell Armstrong report: Landscape, Local Green Space and Heritage Impact Study: Review of Representations; May 2018. This additional evidence was added to the site summary section for WE042 / WE043.
- Appraisals were carried out of development site options proposed in representations that had not been previously appraised as follows: Land at Foker Grange, Leek (LPS19); Land off Park Lane Close, Cheadle (LPS306); Land at junction Town Head and Back Lane, Alton (LPS13); Land between Portland Drive and Forsbrook Cemetery, Blythe Bridge (LPS49/68); BE037, Brown Edge (LPS323); UT024 expanded to south and east, Upper Tean (LPS447).
- To correct an error, the site summaries for CH085a, b, c and d were relocated within section 5.3 from the section headed "sites outside the current development boundary" to within the section headed "sites within the current development boundary".

Final SA Report June 2018

4.18 The Final SA Report was published to accompany the Staffordshire Moorlands Local Plan submitted to the Secretary of State for consideration by the Inspector appointed to to conduct the Examination in Public.

SA of the Main Modifications to the Submission Version Local Plan and Biddulph Options

4.19 The Council consulted on a SA of the Main Modifications and an SA of Biddulph Options alongside consultation on the Main Modifications proposed to the Submission Version Local Plan for a six week period from 18th September until 31st October 2019.

4.20 The Council consulted all the contacts on the Council's consultation database. Publicity arrangements also included:

- The Council invited (by either letter or email) all contacts on the planning policy consultation database to submit representations .
- Direct correspondence with SEA bodies.
- Paper copies of the consultation materials made available at all libraries and Council offices in the District.
- A dedicated web-page on the Staffordshire Moorlands web-site.

4.21 In terms of representations received from the SEA bodies relating to the SA of the Main Modifications and an SA of Biddulph Options:

- The Environment Agency confirmed that they had no objections to the SA undertaken for both the Main Modifications and the Biddulph Options, submitted in support of the Main Modifications consultation.
- Natural England confirmed that it had no further comments to make on the Main Modifications of the Staffordshire Moorlands Local Plan.
- Historic England made no specific comments relating to the SA undertaken for the Main Modifications or the SA of Biddulph Options.

4.22 No other representations at this stage specifically related to the content of the SA undertaken for the Main Modifications or the SA of Biddulph Options.

Regulation 14(4) Consultations

4.23 Consultation with other EU Member States was not required during the preparation of the Staffordshire Moorlands Local Plan since the nature of the proposals set out in the Plan was not expected to give rise to transboundary environmental effects.

4.24 The requirement to provide an explanation of how the results of any consultations entered into with other EU Member States on trans-boundary impacts have been taken into account in the Plan is thus not appropriate in this case.

The reasons for choosing the plan as adopted, in the light of the other reasonable alternatives considered

5 The reasons for choosing the plan as adopted, in the light of the other reasonable alternatives considered

5.1 The appraisal of reasonable alternatives is a fundamental part of the SA process. The Final SA Report (June 2018) explains in detail how plan making has been informed by the appraisal of various options and approaches. Details of the options or reasonable alternatives considered during the development of the Local Plan, the reasons for the selection or rejection of alternatives and a "do nothing" alternative are provided in Section 5 of the Final SA Report. The later SA of Biddulph Options (June 2019) also considered alternative approaches.

5.2 The Staffordshire Moorlands Local Plan establishes the extent of land that will be required for new homes and employment and sets out both development principles and development management policies. The Plan also identifies specific sites for the location of growth. The role of the SA has been to help review the implications of taking forward alternative possible options for each of the above and in each case to make recommendations about the most sustainable approach for the Local Plan to take. The SA also suggests ways to mitigate any negative effects identified or to maximise any positive effects. A summary of the alternatives considered are outlined below.

Housing Requirement Options

5.3 Nathaniel Lichfield & Partners (NLP) prepared a Strategic Housing Market Assessment (SHMA) on behalf of the Council which was updated in 2017. The identification of Objectively Assessed Need (OAN) for housing was at the heart of the study, based on a range of housing, economic and demographic factors, trends and forecasts. At the Council Assembly meeting on 8th March 2017 it was resolved to take forward an annual housing requirement of 320 homes per year.

5.4 To help inform this decision, the following options were appraised in February 2017:

- Option 1: 235 new homes each year (2014 - 2031)
- Option 2: 260 new homes each year (2014 - 2031)
- Option 3: 330 new homes each year (2014 - 2031)
- Option 4: 450 new homes each year (2014 - 2031)

Employment Land Requirements

5.5 NLP also prepared an Employment Land Review for the District which was updated in 2017 to align with the SHMA and also to reflect the changing economic context post British exit from the European Union. The report considered a number of potential future scenarios in order to help identify requirements for B-class employment space.

5.6 At the Council Assembly meeting on 8th March 2017 it was resolved to take forward an employment land requirement of approximately 27 hectares up to the year 2031.

5.7 To help inform this decision, the following options were appraised in February 2017:

- Option 1: 13ha (2014 - 2031)
- Option 2: 16ha (2014 - 2031)
- Option 3: 25ha (2014 - 2031)
- Option 4: 27ha (2014 - 2031)

Development Site Options

5.8 To help inform the Council's choice of site allocations, a wide range of sites with development potential for housing, employment and other uses had been identified and consulted on. Some of these sites had been proposed by the Council and others were identified through consultation responses. A detailed appraisal of each of the site options was made against a set of sustainability objectives and this is documented in detailed matrices forming Section 15 of the June 2018 SA report. Summaries of the findings are provided in Section 5.3 of the same SA report.

5.9 In some cases the Initial SA report accompanying the April 2016 Preferred Options Sites and Boundaries document recommended that further information should be sought concerning the sustainability effects of a proposed site allocation. In some cases the additional evidence has contributed to the justification for the selection or rejection of a site as a preferred option. In all cases SA evidence and the rationale for site selection or dismissal as a preferred option was provided in the June 2018 SA Report.

Alternative development approaches for Cheadle

5.10 In identifying sites for inclusion in the Local Plan: Preferred Options Sites and Boundaries (April 2016), a number of alternative development approaches were considered for Cheadle. In the first instance these were:

- Option 1: Northern Focus
- Option 2: South western focus
- Option 3: Scattered approach

5.11 Following dismissal of these options, further work was undertaken to help inform preparation of the Preferred Options Plan (July 2017). A fourth development approach was then identified and considered, designed to build on the strengths of the three options previously proposed, whilst minimising the cumulative impacts of development identified in each case. The July 2017 preferred option was:

- Option 4: North-South clusters with small sites scattered through the town.

Alternative development approaches for the Rural Areas

5.12 Policy SS3 of the adopted Core Strategy set out the broad spatial distribution of housing and employment development across the District. The approach focused development on the three market towns of Leek, Cheadle and Biddulph and the larger villages but allowed for limited development of other settlements to meet local needs.

5.13 However there are a number of constraints to development in the rural areas. A third of the district lies inside the Peak National Park, where the Peak District National Park Authority represents the special interests of the National Park. Of the remainder of the Moorlands, around 30% is designated as Green Belt. Consequently, and in line with the agreed development approach, the Local Plan Preferred Options Sites and Boundaries (2016) proposed to amend the Green Belt boundary in some locations, including in the rural areas, in order to facilitate development.

5.14 The Housing White Paper (February 2017) included a proposed requirement for authorities to examine fully all other reasonable options before amending Green Belt boundaries. The preferred option at April 2016 was re-examined in the light of this and it was considered that options other than Green Belt release may be available to the Council in order to meet housing need.

5.15 In December 2017 alternative development approaches for the rural areas were appraised as follows:

- Option 1: (Preferred Option 2016) Green Belt release
- Option 2: Countryside release
- Option 3: Growth redirected to towns
- Option 4: Strategic site release

5.16 Following the appraisal, elements of options 3 and 4 were identified as offering sustainable development benefits. However a fifth option - a hybrid of options 3 and 4 was identified as a preferable option. This option 5 - was the option put forward as the preferred option in July 2017:

- Option 5: Preferred Option July 2017: Growth redirected to towns accompanied by strategic site release in the rural areas.

Alternative development approaches for Biddulph

5.17 In addressing the Inspector's post hearing advice in relation to the future development needs of Biddulph, a number of reasonable alternative approaches were considered. The likely significant effects associated with alternative development approaches were appraised in the SA Report Biddulph Options (June 2019). These were:

- Option 1: Do nothing.
- Option 2: Allow targeted Green Belt release around the town to enable additional site allocations where considered deliverable.
- Option 3: Allow strategic Green Belt release around the town to enable identification of safeguarded land.
- Option 4: Allow both targeted and strategic Green Belt release around the town to enable additional site allocations where considered deliverable and identification of further land for safeguarding.
- Option 5: Increase densities at Wharf Road and Tunstall Road to limit the need for Green Belt release as well as limited safeguarding for a future plan period.

5.18 Following the appraisal Option 5 was the option recommended to take forward. It should be noted that the final Inspector's Report (June 2020) concluded that the safeguarding of additional land in Biddulph should not be included in this version of the Local Plan and should be considered as part of a plan review.

Local Plan Policies

5.19 The Staffordshire Moorlands Core Strategy was adopted in March 2014. The Core Strategy contained a suite of existing policies consistent with the National Planning Policy Framework.

5.20 Existing core strategy policies were reviewed as part of the Local Plan preparation process and updated where the evidence base or national planning policy context required it. For this reason, alternative approaches to delivering policy objectives were not appraised, the Core Strategy policy taken as the most appropriate policy option in the first instance. However the policies, updated as required, have been appraised to identify likely significant effects. The appraisal also identified measures for the Local Plan to help address negative effects or to maximise positive ones.

Main Modifications to the Local Plan

5.21 The Main Modifications put forward for consultation in September / October 2019 were not developed following an SA of reasonable alternatives. Instead, it was deemed appropriate and reasonable to consider that the alternatives to the modifications are represented by the existing text or policy in the submitted Local Plan. The existing approach in the submitted Local Plan has been subject to on-going sustainability appraisal as part of the plan making process.

5.22 It should be noted that where a proposed Main Modification related to an amendment or insertion to the text of a policy or its supporting text, the appraisal focussed on the outcomes in terms of the proposed modification itself, and not the original policy or text, which was already subject to sustainability appraisal during earlier stages of the plan making process. The potential social, environmental and economic effects of main modifications to the Local Plan were fully assessed for significant sustainability impacts and reported in the SA of the SMDC Local Plan proposed Main Modifications (Sept 2019).

The measures that are to be taken to monitor the significant effects of the implementation of the Local Plan

6 The measures that are to be taken to monitor the significant effects of the implementation of the Local Plan

6.1 The SEA Directive requires monitoring of the significant environmental effects of implementing the plan. SA monitoring will cover the significant economic and social effects as well as the environmental ones.

6.2 The table below sets out the measures for monitoring the likely significant effects of implementing the adopted Local Plan. The monitoring measures proposed are linked to the SA process, including the objectives, targets and indicators developed for the SA Framework, the baseline information and key sustainability issues, the likely significant effects expected, and the mitigation measures proposed.

6.3 The monitoring measures focus on the significant sustainability effects that may give rise to irreversible damage (with a view to identifying trends before such damage is caused) and the significant effects where there is uncertainty in the SA and where monitoring would enable preventative or mitigation measures to be taken.

6.4 The policies and objectives of the Local Plan will be delivered in the context of the Development Plan as a whole, and the wider policy framework which sits alongside the planning system. For this reason, monitoring the sustainability effects of implementing the Local Plan will be conducted as part of the overall approach to monitoring the sustainability effects of implementing this and other Planning Documents. Progress will be reported through the Annual Monitoring Report.

6.5 Wherever possible, existing monitoring arrangements, including information collected by outside bodies, have been suggested as a source of indicators.

6.6 The statutory environmental consultees and other stakeholders have made an important contribution to this part of the SA, particularly in terms of developing the baseline information and SA Framework. They have also contributed to the monitoring proposals for the sustainability effects of implementing the Local Plan and in particular agreed the sustainability effects to be monitored and the information to be collected, including by whom and when.

What needs to be monitored?	What sort of information is required?	Indicators	Source of information
Effects on the economy	Success of small businesses. Vitality of town centres.	<ul style="list-style-type: none"> • Employment land supply. • Retail vacancy rates. 	Local Planning Authority. Inter Departmental Business Register, available from ONS at local authority level.
Effects on diversity and abundance of flora and fauna and geological interests	Trends relating to the management and condition of SSSIs and Local Wildlife Sites. Protection of priority habitats and species and geological interests on undesignated sites, both brownfield and greenfield.	<ul style="list-style-type: none"> • Area (ha) of SSSIs and Local Wildlife Sites lost to development requiring planning permission. 	Staffordshire Wildlife Trust. Local Planning Authority.
Effects on climate change	Location of housing and employment development. Amount of renewable energy produced in area. Carbon dioxide emissions. Incorporation of sustainable design features in new development.	<ul style="list-style-type: none"> • Total carbon dioxide emissions. • Amount of renewable energy generation by installed capacity and type. 	Defra publication of local CO ₂ emissions every Autumn. http://www.defra.gov.uk/environment/statistics/globalatmos/galocalghg.htm Local Planning Authority. Staffordshire County Council
Effects on landscape and townscape quality	Impact of development of landscape and townscape character.	<ul style="list-style-type: none"> • % or areas of historic buildings, sites and areas including locally listed 	Historic England. Local Planning Authority.

What needs to be monitored?	What sort of information is required?	Indicators	Source of information
	Development on greenfield sites.	<ul style="list-style-type: none"> assets affected, whether in an adverse or beneficial way. % of new and converted dwellings built on previously developed land. 	
Control of flood risk	Location of new development in relation to flood zones.	<ul style="list-style-type: none"> Number of planning applications granted contrary to the advice of the Environment Agency in respect of flood risk. 	Environment Agency
Accessibility of jobs, services and facilities	Access to services for all, including young and older people and those living in rural or remote settlements.	<ul style="list-style-type: none"> New indicator to be developed in consultation with Staffordshire County Council 	Staffordshire County Council
Effects on deprived areas and disadvantaged groups	Local concerns relating to anti-social behaviour. Health inequalities. Community cohesion.	<ul style="list-style-type: none"> Premature (persons under 75 years) all cause standardised mortality ratios. Domestic burglaries per 1,000 households 	ONS Crime Survey for England and Wales

What needs to be monitored?	What sort of information is required?	Indicators	Source of information
Housing which meets local needs	Availability of affordable housing. Housing types, tenures and sizes that meet housing need.	<ul style="list-style-type: none"> ● Number of affordable housing completions. ● Net additional dwellings for each year over plan period. 	Strategic housing team

Table 6.1 Proposals for monitoring the significant effects of implementing the Staffordshire Moorlands Local Plan

Further Information

7 Further Information

7.1 The Final Sustainability Appraisal (incorporating SEA) (June 2018) can be found as document SD6.5 along with all other Examination library documents, including the SA of the Main Modifications to the Staffordshire Moorlands Local Plan at:

https://www.staffsmoorlands.gov.uk/examination_library

7.2 For further information please contact the Planning Policy team at:

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