

SUSTAINABILITY APPRAISAL & CONSULTATION STATEMENT FOR THE BIDDULPH TOWN CENTRE AREA ACTION PLAN

PART 1 – SUSTAINABILITY APPRAISAL STATEMENT

Introduction

- 1.1 Sustainability Appraisal (SA) is a process to ensure that the social, economic and environmental impact of emerging plans is considered as an integral part of the plan-making process. Under the Planning & Compulsory Purchase Act 2004 and European Strategic Environmental Assessment (SEA) Directive 2001/42/EC on the 'assessment of the effects of certain plans and programmes on sustainability' local authorities are required to assess and take into account sustainability issues when developing LDF documents.
- 1.2 The Sustainability Appraisal of the Biddulph Town Centre Area Action Plan (AAP) has been undertaken in 4 distinct parts in parallel with the plan production process. These are:
 - Evidence Gathering / Scoping Stage;
 - Issues & Options Stage;
 - Preferred Options Stage; and
 - Submission Stage.
- 1.3 Each part of the AAP process has been informed by findings of the sustainability appraisal. The process of sustainability appraisal for the plan has been conducted using Government guidance called 'Applying Sustainability Appraisal to Regional Spatial Strategies and Local Development Frameworks'.
- 1.4 This statement summarises the results of the sustainability appraisal at each stage in the plan production process and explanations are given as to how these findings have been taken into account in producing the AAP. This includes information about how the AAP changed or why no changes were made as a result of SA and why options were rejected. There is also a section detailing how sustainability issues have been taken into account generally in the process. Full details about the SA process can be found in the Sustainability Appraisal of the adopted AAP, which is a separate document available on the District Council's website or at the offices in Biddulph, Leek and Cheadle.

Evidence Gathering / Scoping Stage

1.5 At the pre-production stage, the Sustainability Appraisal Scoping Report has supplied information to support the evidence base of the AAP through the collection of baseline data relating to social, economic and environmental issues specific to the AAP area (refer to Table 1 below).

l able 1 – Sustainability Issues Identified							
	Sustainability Issue	Source					
Social	 Biddulph East has a high proportion of population under the age of 16. Poor health is notably higher in Biddulph East than the rest of the District The AAP area contains some of the most deprived areas in the UK with Biddulph's 'Central Area' and 'Town Centre' Super Output Areas falling within the top 15% and 34% respectively, nationally The AAP area lacks a vibrant housing market and housing choice 	 ONS, Census 2001 ONS, Census 2001 Indices of Deprivation, 2004 ONS, Census 2001 					
Environment	 There is a shortfall in play areas and playing pitches in the Biddulph area 	 2003/2004 Survey of Open Spaces 					
Economic	 Biddulph has few local job opportunities – There is a high dependency on work outside of the District Concentration of unemployment persists in the Biddulph East ward Proximity of nearby centres draw retailers and shoppers away from Biddulph 	 Census 1991 Labour Market trends, October 2004 					
Cumulative effects	Further work needs to be done to identify whether or not any of the above issues are so critical that other, secondary, sustainability problems would become apparent if further deterioration in the situations above would ensue. As more residential and other development takes place in and around the town centre, if the town centre is unable to provide for the retail and other needs of these residents, this will lead to increased out- commuting, primarily by car, leading to increased emissions/environmental effects						

1.6 This information has helped to develop the objectives of the AAP and will be instrumental in the prediction and future assessment and monitoring of the effects of the Plan's strategies and programmes on sustainability. It was added to all the other data gathered at baseline stage and integrated into a baseline report. In order to keep the information as up to date as possible, the contents of the Scoping Report were revised throughout the plan production process.

Issues & Options Stage

1.7 Four distinct options were developed from the baseline information at the 'issues & options' stage of the plan production process to stimulate debate amongst the public and other interested parties. The options were led by the identification of potential key development sites and consideration of how these could be linked together to meet the Plan's spatial objectives. A summary of each option and how it performed in sustainability terms including reasons why it was or was not taken forward as the preferred option is detailed below.

Option 1: Environmental and Highway Improvements to Wider High Street Area

- 1.8 **Option 1** proposes least change to the town centre. Environmental and highway improvements are proposed on a much-reduced scale and development is clearly focused towards the High Street. This option stems from a report produced by Nicol, Jones & Lomax in 2000.
- 1.9 In sustainability terms, this option performs relatively well in the short and medium term, with negative impacts largely related to the proposed employment and/or food retail development on greenfield land west of the bypass. However, this option does not offer a holistic approach towards development of the town centre. Its positive impacts are more restricted in the long-term as minimal economic and physical growth is catered for and there are limited improvements to attract locals, businesses and visitors alike. The disadvantages of this option identified in the sustainability appraisal were echoed by those who took part in the issues and options consultation. The majority felt that elements of this option was not taken forward as the preferred option is because it did not meet all the aims of the plan.
- 1.10 It was recognised that for a major change in shopping patterns, a key catalyst was required. This led to a new supermarket being included in options 2, 3, and 4.

Option 2: New Supermarket on Bypass and Consolidate the Town Centre

- 1.11 **Option 2** proposes a new large supermarket away from the town centre area. Improvements to the highway and environment, and development of more town centre uses are also proposed. Option 2 was drawn up in the light of the existing Local Plan allocation for employment and retail uses on land at the west side of the bypass, as well as known developer interest in retail development on this site.
- 1.12 This option does not perform as well as the other options in terms of sustainability appraisal, with a key focus towards development on a greenfield site. Although the site is located close to the town centre and will help to direct

some of the additional traffic that this high-user development may generate away from the centre, new uses may subsequently begin to focus on this site and attract retailers and users away from the town's core. A larger supermarket in the town centre may draw back local residents who currently travel out to neighbouring centres. The disadvantages of this option identified in the sustainability appraisal were echoed by those who took part in the issues and options consultation, particularly trade being removed from the town centre. The primary reason this option was rejected was because of the potential threat of an edge of centre supermarket to town centre. Government guidance promoting town centre development wherever possible was taken into account, as were the aims of the plan and how these could best be achieved.

1.13 Options 3 and 4 were derived in response to the need to consider alternative sites for a supermarket that would be located within rather than on the edge of the town centre in line with Government policy.

Option 3: New Supermarket on Somerfield Site and Consolidate Centre

- 1.14 **Option 3** proposes a new medium-sized supermarket within a newly identified town centre core. Significant change will be brought about by proposed redevelopment of land to the north of Wharf Road, highway and environmental improvements and new town centre uses.
- 1.15 Although this option creates relatively high negative impacts in the short-term, largely brought about by the demolition of existing uses, redevelopment will allow significant improvements to the quality of the town centre environment. This will open up the centre to include the Wharf Road area and allow more efficient use of land. A larger supermarket in the town centre should attract more linked trips and also draw back local residents who currently travel out to neighbouring centres. A medium-sized supermarket will, however, take up a large area of land, which may otherwise be used for other town centre uses. A supermarket of this size could also dominate the townscape and have a negative impact on the character and distinctiveness of the area.

Option 4: Consolidated Centre, Supermarket on Somerfield Site, New Road Through Somerfield Site and Pedestrianisation of High Street Between Wharf Road and Station Road

1.16 **Option 4** proposes a new medium-sized (smaller than Option 3) supermarket within a newly identified town centre core including partial pedestrianisation. Significant change will be brought about by proposed redevelopment of land to the north of Wharf Road, highway and environmental improvements and new town centre uses.

1.17 As with Option 3, this Option creates relatively high negative impacts in the shortterm, largely brought about by the demolition of existing uses. However, redevelopment will allow significant improvements to the quality of the town centre environment. This will open up the centre to include the Wharf Road area and allow more efficient use of land. A medium-sized (smaller than Option 3) supermarket will enable a number of other types of development to also locate on this site, improving the balance of the town centre. This will enhance local distinctiveness and attract other retailers and businesses to locate in the town centre area. The proposed link road through the site may also help to improve traffic flow.

Option 5: Suggested by a Consultation Respondent

- 1.18 In addition to the 4 options detailed above, as a result of the initial options consultation on the AAP, a fifth option was suggested by a respondent. **Option 5** proposed an area of major redevelopment of land to the north of Wharf Road, including proposals for a new supermarket, market and residential, retail, employment and live/work units. Significant change was suggested by proposed redevelopment within the centre, highway and environmental improvements and new town centre uses. Additional cultural facilities were also proposed, including a new learning resource and heritage centre along with an urban forest.
- 1.19 As with Options 3 and 4, Option 5 creates relatively high negative impacts in the short-term, largely brought about by the demolition of existing uses. However, redevelopment will allow significant improvements to the quality of the town centre environment. This will open up the centre to include the Wharf Road area and allow more efficient use of land. The size of the supermarket is likely to have varying impact on traffic and the viability of other uses proposed for the site. The supermarket, together with the proposed mix of uses and new facilities, including leisure and open space, will improve the balance of the town centre. This will help to enhance local distinctiveness and attract other retailers, businesses and visitors to the area.
- 1.20 The sustainability appraisal concluded that the proposals will inevitably generate more traffic into the town centre. Although the bypass may help to alleviate some of the pressures, traffic routing and car parking issues were not considered to have been adequately addressed in this option.
- 1.21 Elements of this option such as the supermarket, transport interchange, environmental improvements and gateways are very similar to option 4. Although new features such as a learning resource centre, a heritage centre and an urban forest suggested in this option would all enhance the local distinctiveness of the town in line with the aims of the plan, implementation is also a key factor to consider in the plan production process. There is no indication that these elements would be financially feasible within the life span of the AAP, particularly as the sites suggested are in private ownership. Therefore it was not considered appropriate to include them as part of the preferred option.

Overall Finding:

- 1.22 Option 4 performs better overall in sustainability appraisal terms. Whilst it is accepted that there are negative impacts in the short to medium-term, the cumulative impact of its key components allow more positive social, economic and environmental effects to be sustained in the medium to long-term.
- 1.23 The sustainability appraisal results along with, results of the consultation and compliance with the aims of the plan and Government guidance meant that elements within option 4 were chosen as the 'preferred option'. Although the elements of options 3 and 4 were very similar, the pedestrianisation element of option 4 proved very popular with the general public during the consultation process. There were no significant changes required resulting from the SA of this option.

Preferred Options Stage

- 1.24 In response to comments received at the initial options stage, including representations received in response to option 4 and further analysis into the feasibility of various elements of the scheme, a number of changes were made to option 4 to form the Preferred Option.
- 1.25 The link road through the Wharf Road site, splitting it into two was removed for feasibility reasons. The extent of the employment / residential area around Walley Street was reduced as once detailed feasibility work was completed, it was concluded that the greenfield land between Walley Street and the bypass was surplus to requirements. Indicative layouts were shown for the two major development sites, the Wharf Road site and land to the west of the bypass. Amendments were also made to the traffic flows shown in Option 4 due to further feasibility work having been undertaken.
- 1.26 The elements of the preferred option were assessed and the results are detailed in Table 2.

Table 2 - Summary of Sustainability Impact of the	he Preferred Option
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SA Objectives	Short Term (less than 1 year)	Med Term (1-5 years)	Long Term (5 years or more)	Summary of Appraisal
Social	+/-	+/-	+	Development of the Preferred Option will generate additional services and facilities, reduce the need to travel and significantly improve the physical environment bringing permanent positive social impacts on sustainability in Biddulph and neighbouring areas in the short, medium and in particular - over long term. Negative impacts are largely generated through proposed development west of the bypass, though effects of this is likely to be less significant in the long term.
Environment	+/-	+/-	+	Considerable permanent positive impacts will be gained - including enhancement of the character of the townscape of Biddulph town centre and strengthening of local distinctiveness will be generated in the medium to long term. Negative impacts largely result from loss of soil quality/greenfield land through development west of the bypass.
Economic	+	+	+	There are overall permanent positive economic impacts on sustainability in the short, medium and long term. Development of the Preferred Option will bring greater retail trade, businesses and associated jobs to Biddulph. These will be maintained and strengthened through additional demand created by users to the improved town centre.

+ = Positive - = Negative

N.B. Different components within an Option may generate varying impacts. This is indicated by \mathscr{P}

Conclusions of the SA of the Preferred Option

1.27 Overall - in the medium to long term - there are significant permanent positive benefits to be gained from development of the Preferred Option in relation to social, environmental and economic impacts on sustainability. Although there are negative impacts - largely associated with new development west of the bypass and redevelopment of land to the north of Wharf Road - many of these effects can be minimised through the drafting of policies and supporting text, or

represent only temporary disruptions whilst mitigation measures are enforced and/or other proposals take shape to help balance these.

1.28 An important contribution the SA made at this stage was to inform policy creation at the submission stage. The SA concluded that policies needed to be developed to assist implementation of proposals, reduce negative impacts and promote positive effects of the Preferred Option. It was also concluded that appraisals needed to be undertaken as an iterative process - in drawing up these policies and also once they have been defined - to determine the impact they will have on sustainability.

Submission Stage

- 1.29 Issues raised through the SA were carefully considered. During policy creation, for instance, at the preferred option stage in the SA process it was identified that residential developments in the Walley Street area could be affected by disturbance from neighbouring employment uses. Policy wording and supporting text was specifically drafted in order to address this issue.
- 1.30 Another issue, identified by the SA, concerned the site to the west of the bypass. Potential loss of views out to the countryside as a result of proposed development was identified as a negative impact. This resulted in a requirement for landscaping to mitigate the impact of the development on surrounding rural areas to be included in the policy wording.
- 1.31 Each policy was then assessed against social, environmental and economic SA objectives. The results of this exercise are detailed in Table 3.

Conclusions of the SA at Submission Stage

- 1.32 New proposals delivered through the Plan will contribute permanent positive social, economic and environmental impacts, and allow for further growth and enhancement of Biddulph Town Centre. Introduction of a wider range of uses and general improvements, including transport, public realm and site specific enhancements and developments, are likely to provide additional jobs for local people and attract an increased number of visitors to help sustain and add to the vibrancy of the town centre economy.
- 1.33 Negative impacts, largely resulting from development of the Bypass site and demolitions of and disruption to existing businesses on the Wharf Road site, will be offset to a certain extent by social and economic gains and overall improvement of the quality of the town centre environment.
- 1.34 It must be ensured that new developments are compatible with other new and existing uses and complementary in design and layout to the town centre

environment. Strict attention to detail is required to ensure that potentially harming effects are prevented/minimised and positive effects enhanced.

1.35 Sustainable construction techniques and maximisation of energy efficiency, in particular through greater attention to building layout and design, should be incorporated into all new developments.

Overall Conclusions

- 1.36 The SA process has played a key part in informing and influencing the AAP production process.
- 1.37 The SA was most influential at the evidence gathering and issues and options stages. No big issues came out of the SA process at preferred options or submission stage, which resulted in any major changes to the AAP being necessary. However, issues such as potential noise disturbance and loss of views identified by the SA could be mitigated by the inclusion of appropriate policies and supporting text in the Submission Version document. As the plan objectives were tied in with the SA process at an early stage, they contained broadly sustainable principles from the start. For instance, encouraging local people back to the town centre for shopping is a key sustainability issue. It was considered that the allocation of a supermarket in a town centre location was crucial for accessibility reasons and also to encourage linked trips. Similarly, the location of the non-food retail scheme was carefully selected in order to provide suitable linkages to the town centre.

Final SA Report

1.38 The independent Examination of the Biddulph Town Centre Area Action Plan took place in October / November 2006. In her report, the Inspector found the Area Action Plan to be sound and makes the following statement about the SA process:

^{'I} consider that the process, baseline information used and the outcomes are properly identified and that the options tested represent real rather than notional differences in policy, also that the AAP complies with the requirement of section 19(5) of the 2004 Act.'

As no fundamental changes to the AAP were recommended, no further SA work is required and consequently no major amendments to the SA report have been made.

Monitoring

- 1.39 Monitoring of the SA allows the actual effects of implementation of the Plan to be identified. It will be included as part of the District Council's Local Development Framework Annual Monitoring Report.
- 1.40 The indicators derived to measure the effectiveness of the Area Action Plan policies are included in Section 9 of the adopted Area Action Plan (Monitoring Framework).

SA Objectives	Short Term	Med Term		Summary of Appraisal
Social	/++	-/++	0/++	Significant improvements to the quality of the physical environment; range of services and facilities; and access to these by both public and private means. Positive impacts are sustained over time as further investments are delivered and help contribute towards strengthening of the town centre and reducing the need to travel. Loss of views resulting from development of the Bypass site may become less significant in the medium to long term, as the town centre itself takes shape to form a high quality place for people to work and live.
Environment	/++	-/++	0/++	Progressive enhancement of the character of the townscape as developments come together to form a more compact and consolidated town centre. Focus of key developments within a defined primary shopping area and investments into transport, public realm and gateway improvements, strengthen local distinctiveness and sense of place. Impact of development on greenfield land at the Bypass site and demolitions at the Wharf Road site, may reduce over time, as the sites develop to become a more integral part of the wider town centre area. There may also be opportunities to further enhance the Town Centre environment, to the north, through designation of land as Visual Open Space.
Economic	-/++	0/++	++	Considerable investments made through new and refurbished developments in the short, medium and long term. Diversification enabled through expansion in the range of services and facilities offered in the town centre. Existing uses are sustained and strengthened through further growth and modernisation of the local economy, and additional jobs created. Assistance provided to support relocation and business continuity for those directly affected by demolition proposals and help to minimise negative impacts.

Table 3 - Summary of Sustainability Impact of the Submission Version of the Plan

++ = Major positive impact + = Minor positive impact -- = Major negative impact - = Minor negative impact 0 = Neutral

*N.B. Different components within an Option may generate varying impacts. This is indicated by '/'

PART 2 – CONSULTATION STATEMENT

- 2.1 The draft Biddulph Town Centre Area Action Plan was prepared in accordance with the Town and Country Planning (Local Development) (England) Regulations 2004 ("the Regulations") and the guidance set out in PPS12. Consultation took place with the community and key stakeholders at the beginning of the process in early 2005 to collect evidence about the town centre to inform the issues and options stage. This consultation took the form of meetings with organisations such as Advantage West Midlands, Staffordshire Moorlands Primary Care Trust, the Local Strategic Partnership and Staffordshire County Council, along with surveys of existing town centre retailers and users.
- 2.2 This was followed by the Issues and Options stage, which took place in March and April 2005. All those involved at the evidence gathering stage were invited to participate along with appropriate specific consultation bodies such as utilities and telecommunications operators, the Environment Agency and neighbouring authorities. Those who were directly affected by any of the initial options were consulted along with locally and nationally based interested parties. A local high school were also consulted by using the initial options material in their geography classes and completing feedback forms with their views. Potential options were presented in a technical document and a summary leaflet. A public workshop was held in March 2005 and the exhibition boards used at this event were then displayed in locations throughout the town along with the summary leaflets and feedback forms.
- Consultation on Preferred Options took place between 25th July and 5th 2.3 September 2005. A wide variety of individuals and organisations were consulted at this stage including the Government Office for the West Midlands, Highways Agency, Environment Agency, English Nature, neighbouring authorities, utilities and telecommunications operators. Government departments, voluntary bodies, and bodies representing different racial / ethnic / national / religious / disabled interests. All those previously involved at issues and options and the evidence gathering stage were invited to take part in consultation. Businesses and residents directly affected by proposals in the preferred option were personally consulted and invited to private meetings to discuss their circumstances. Information about the preferred options was made available and advertised in line with Regulation 26. Additionally, a consultation event was held in Biddulph in July and an exhibition displayed in various locations throughout the town along with summary leaflets detailing the proposals and comments forms. Several meetings were held with interested parties such as the local business community, local residents living adjacent to one of the main proposed development sites and a local design panel.
- 2.4 Summaries of the representations received at the Preferred Options stage were made available on the District Council's website. A detailed statement of

consultation has also been prepared and is a separate document available to view at the District Council's main offices in Leek.

- 2.5 At Submission Stage, held between 30th January and 13th March 2006, all individuals and organisations previously consulted were invited to comment on the 'soundness' of the plan. The requirements set out in the regulations were all carried out. In addition to detailed documentation a summary leaflet and comments form was made available in a variety of locations in order to invite public comment. The representations received at this stage were all taken through to the independent Examination, which took place in October / November 2006.
- 2.6 The District Council received the Inspector's report in January 2007, which concluded that the AAP is 'sound' subject to a number of minor changes. The Council resolved to adopt the AAP including the Inspector's recommendations on **22nd February 2007**. In line with the regulations, the Adoption Statement and Sustainability Appraisal Report have now been made available for inspection at the District Council's offices and on the website. Notice of adoption has also been given in local newspapers and by letter to those who have asked to be notified.

Sustainability Appraisal Consultation

- 2.7 Consultation on the SA process has been undertaken in parallel with AAP consultation. Consultation on the Scoping Report took place between 12th January and 3rd February 2005. The purpose of this was to ensure that the objectives were appropriate and the scope and level of detail proposed for subsequent stages of the AAP are comprehensive and robust enough to support decisions made on strategies and proposals of the Plan with regard to sustainability. The four key SEA consultation bodies, The Countryside Agency, English Heritage, English Nature and the Environment Agency were consulted along with other key stakeholders and interests. A number of minor comments were received which were carefully considered and incorporated into the document where appropriate.
- 2.8 At Issues and Options stage, the SA of options document formed part of the AAP consultation, which took place between 19th March and 22nd April 2005. A small number of minor comments were received which were carefully considered and incorporated into the document where appropriate.
- 2.9 At Preferred Options stage, the SA of the preferred options document formed part of the AAP consultation, which took place between 25th July and 5th September 2005. A number of comments relating to the SA were received as a result of this consultation, most stating that they were in agreement with the

results. Each comment was carefully considered and amendments made to the document where necessary.

- 2.10 At Submission Stage, the SA of the AAP document formed part of the submission to the Secretary of State and formal consultation on both the AAP and SA took place over a six-week period between 30th January and 13th March 2006. No specific comments were received about the content or methodology of the SA at this stage.
- 2.11 In line with the regulations, the SA report is available to view free of charge at the District Council's offices and on the website.