

STAFFORDSHIRE MOORLANDS CORE STRATEGY
SUSTAINABILITY APPRAISAL UPDATE
(INCORPORATING HABITAT REGULATIONS
ASSESSMENT)

MAIN MODIFICATIONS

JUNE 2013

Sustainability Appraisal of Main Modifications June 2013

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1. Introduction

- 1.1 The Revised Submission Core Strategy was submitted to the Secretary of State for examination in September 2012. The formal hearing part of the examination took place from 5th to 8th February 2013. The Inspector issued his interim conclusions on 5th March 2013 which identified some key areas which he considered needed to be modified before the plan could be adopted. The Inspector invited the Council to consider what form these modifications should take. Subsequently the Council requested clarification and the Inspector issued further comments. The inspector's interim conclusions, the officer's comments and the Inspector's response are all available on the Council's website.
- 1.2 A report will be considered by the LDF Working Party on the 22nd May 2013 and will be considered by the Council Assembly on the 4th June 2013. Following agreement by the Council the proposed modifications will need to be published for 6 weeks of consultation. The inspector will consider the proposed modifications and the results of the consultation before preparing his final report.
- 1.3 The Inspector has indicated that, if or where it is considered necessary, the Sustainability Appraisal should be reviewed. The Council considers it appropriate to undertake a review at this stage to understand the potential impacts of these changes on sustainability. Habitat Regulations Assessment has also been undertaken (refer to Section 8) in order to assess any impact of the main modifications on European Sites. This assessment relates only to the main modifications proposed to the Revised Submission Version Core Strategy 2011 and should be read in conjunction with the Staffordshire Moorlands Core Strategy Sustainability Appraisal of the Revised Submission Version Update August 2012 (Examination Document I11).
- 1.4 Following the Inspector's final report a Final Core Strategy SA Report will be produced alongside the adopted Core Strategy Development Plan Document.

2. Summary of Main Modifications

2.1 A summary of the changes is included below.

Policy SS1a: Presumption in Favour of Sustainable Development (New Policy)

This new policy reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework (NPPF). Planning applications that accord with policies in the Core Strategy will be approved without delay, unless material considerations indicate otherwise. Where there are no relevant policies, or policies are out of date the Council will also approve applications unless material considerations indicate otherwise.

Policy SS2: Future Provision of Development

The changes to this policy include:

- An increase in housing provision from 5500 to 6000 additional dwellings to be completed in the Staffordshire Moorlands during the period 2006 to 2026.
- Reference to the affordable housing target as part of the overall housing provision has been removed.
- A commitment to an early review of the Core Strategy which will be rolled into a single Local Plan combined with the Site Allocations DPD.
- Changes to the development rates post 2016.

Policy SS4: Managing the Release of Housing Land

New paragraph added to confirm that the Strategic Housing Land Availability Assessment (SHLAA) will identify specific deliverable sites sufficient for 5 years supply of housing and an additional buffer of 5% or 20% where appropriate.

Policy SS5: Towns

The increase in the housing requirement in Policy SS2: Future Provision of Development is reflected in the figures for the three towns.

Policy SS5a: Leek Area Strategy

Amendment to reflect changes to Policy SS7: Churnet Valley Area Strategy.

Policy SS5b: Biddulph Area Strategy

An amendment has been made to this policy to clarify that the small urban extensions in the green belt will be identified as part of a review of the green belt boundary through the Site Allocations DPD and the review of the Core Strategy.

Policy SS5c: Cheadle Area Strategy

The extension to the urban area to the north east of Cheadle (Area 2) has been deleted. The policy states that the Council will assess the need for other broad locations through the review of the Core Strategy. References to the need for a bypass and other infrastructure improvements have been moved to the supporting text.

Policy SS6: Rural Areas

The increase in the housing requirement in Policy SS2: Future Provision of Development is reflected in the figures for the rural area.

Policy SS6a: Larger Villages Area Strategy

Minor change to the text to refer to 'built-up' rather than 'urban' to provide a clearer description.

Policy SS6b: Smaller Villages Area Strategy

An amendment has been made to this policy so that new housing in smaller villages no longer have to meet an 'essential local need' as required in the countryside, but need to meet a 'local need'.

Policy SS6c: Other Rural Areas Area Strategy

Amendments to this policy include:

- clarification to include the types of housing development that would be acceptable in the countryside and green belt.
- deletion of the reference to Blythe Business Park as expansion and redevelopment of existing businesses are covered by general guidance under Policy E1: New Employment Development.
- amendment to text in part 5 relating to the Churnet Valley which reflects changes to Policy SS7: Churnet Valley Area Strategy.
- amendment to clarify the process for undertaking a review of the green belt boundaries.

Policy SS7: Churnet Valley Area Strategy

Amendments include:

- changes to clarify the aims of the strategic policy for the Churnet Valley;
- guidance on the principles of development which the Council would support; and
- stronger emphasis on the considerations regarding impact on the natural environment etc.

Policy SD1: Sustainable Use of Resources

This policy has been amended so that:

- previously developed land targets have been deleted;
- it has clarified circumstances for development on previously developed land and greenfield sites;
- only major-scale planning applications will need to provide a Sustainability/Energy Statement (originally most applications needed this);
- it is no longer required that the 'Building for Life' tool standards are applied to new developments, although the benefits will be incorporated into the supporting text.
- the target of 25% of minerals used from recycled / reused content in new-build schemes has been deleted and replaced with the need for developers to investigate the potential;
- the reference to site waste management plans has been removed as these are covered by separate legislation;
- there is no longer a requirement that all new development achieves the highest viably possible water conservation standards; however the Council's support for elevated water conservation standards remains. Also reference to how all new development should consider Sustainable Drainage Systems has been removed.

Policy SD2: Renewable and Low-Carbon Energy

In order to improve clarity the previous Policy SD2 has been sub-divided into two separate policies: the first Policy 'Renewable and Low-Carbon Energy' is the new SD2 Policy – this carries forward the Policy about stand-alone renewables from Part (1) of the original Policy which is unchanged apart from the removal of the requirement for considering brownfield sites first. The second Policy (new "SD3") 'Carbon-Saving Measures in New Development' is set out below.

Policy SD3: Carbon-Saving Measures in Development (New Policy)

This Policy consolidates Parts (2-5) of original Policy SD2; but the original requirements from these Parts have been substantially reworded to remove certain requirements/expectations upon developers and more clearly give an indication of those measures that the Council will support.

Policy E1: New Employment Development

Amendment to include general guidance for the redevelopment, intensification or improvement of existing employment sites.

Policy E3: Tourism and Cultural Development

Policy amended to provide greater clarity on those forms of tourism and cultural development which are appropriate and to reflect modifications to policy SS7 (Churnet Valley).

Policy H2: Affordable and Local Needs Housing

This policy has been amended to reflect a reduced scale of 33% affordable housing obligations to 2016 to be consistent with the current evidence of viability. This was previously 40% in the towns and 50% in the larger villages. This target will be reviewed from 2016. Removed requirement for all housing in rest of rural areas to be either affordable to be either affordable or meet a local need which cannot be met elsewhere.

Policy H3: Gypsy and Traveller Sites

The requirement for applicants to first prove a 'need' when determining planning applications for gypsy and traveller sites has been deleted.

Policy R2: Rural Housing

Removal of the requirement for conversions to be affordable or meet an identified local need.

3. Sustainability Appraisal Objectives

| SA OBJECTIVES | | |
|---------------|-------|--|
| SOCIAL | SA 1 | To improve the quality of where people work and live, and minimise risks and nuisances |
| | SA 2 | To eliminate social exclusion by promoting, maintaining and improving facilities, services and opportunities for all and access to them |
| | SA 3 | To minimise opportunities for crime and reduce the fear of crime |
| | SA 4 | To ensure adequate quality and provision of a range of house types to meet local needs in appropriate locations, and maintain and improve the local housing stock and provision of affordable/social housing |
| | SA 5 | To direct development to more sustainable locations and reduce the need to travel |
| | SA 6 | To strengthen transport links between rural areas and towns, and improve conditions for walking, cycling and travel by public transport |
| ENVIRONMENT | SA 7 | To identify, conserve and enhance biodiversity sites and to maximise opportunities for achieving Biodiversity Action Plan targets |
| | SA 8 | To protect and enhance key habitats and species |
| | SA 9 | To reduce contamination, regenerate degraded environments and maintain soil resources and quality |
| | SA 10 | To promote efficient use of resources |

| | | |
|-----------------|-------|---|
| | SA 11 | To reduce energy consumption and waste production, and facilitate renewable energy |
| | SA 12 | To reduce flood risk, protect and enhance water sources and environmental assets, and reduce contributions and vulnerability to climate change |
| | SA 13 | To protect and enhance the character of the landscape and townscape, historic assets, and maintain and strengthen local distinctiveness and sense of place |
| | SA 14 | To encourage further development of tourism and culture |
| ECONOMIC | SA 15 | To safeguard the vitality and viability of the District's towns and villages, and create and sustain a vibrant rural economy |
| | SA 16 | To strengthen, modernise and diversify the District economy, and promote sustainable economic growth |
| | SA 17 | To encourage and support a high and stable level of employment and variety of jobs to meet local employment needs |

- 4.1 The table above assesses the compatibility between the modified and new policies and the other policies in the plan. Policies that have not been amended can be viewed in the Staffordshire Moorlands Core Strategy Sustainability Appraisal of the Revised Submission Version Update August 2012 (Examination Document I11).
- 4.2 The table indicates that no conflicts have arisen between the policies and that there are many positive relationships.

5. Assessment of the Components of the Main Modifications of the Core Strategy against SA objectives

+ = Positive ++ = Significantly Positive -- = Significantly Negative - = Negative
 0 = Neutral (no significant positive or negative effects) ? = Impact Unknown
 I = Impact dependent on how implemented

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

| SA Objective | | Component/Policy | | | | | | |
|--------------|--|--|--|--|-----------|---|-------------------------------|---|
| | | SS1a Presumption in Favour of Sustainable Development (New Policy) | SS2 Future Provision | SS4 Managing the Release of Housing Land | SS5 Towns | SS5a Leek Area Strategy | SS5b Biddulph Area Strategy | SS5c Cheadle Area Strategy |
| SOCIAL | 1. To improve the quality of where people work and live, and minimise risks and nuisances | + | ++ increasing the number of dwellings in the District therefore more choice | 0 | ++ | ++ | ++ | ++ |
| | 2. To eliminate social exclusions by promoting, maintaining and improving facilities and services and opportunities for and access to them | + | ++ increase in employment land, more choice, greater opportunity to work locally | 0 | ++ | ++ | ++ | ++ Potential support for primary school and recreation area remains |
| | 3. To minimise opportunities for crime and reduce fear of crime | + | 0 | 0 | 0 | + environmental enhancement, promotion of the evening/ night- | + regeneratin g and improving | + regenerating and improving |

| SA Objective | Component/Policy | | | | | | |
|--|--|---|--|---|---|---|---|
| | SS1a Presumption in Favour of Sustainable Development (New Policy) | SS2 Future Provision | SS4 Managing the Release of Housing Land | SS5 Towns | SS5a Leek Area Strategy | SS5b Biddulph Area Strategy | SS5c Cheadle Area Strategy |
| | | | | | time economy | the streetscape , improving image and identity of Biddulph | the streetscape |
| 4. To ensure adequate quality and provision of a range of house types to meet local needs in appropriate locations, and maintain and improve the local housing stock and provision of affordable/ social housing | + | ++ Reduced target for affordable housing will be offset by increased overall housing provision. | ++ | ++ Reduced target for affordable housing will be offset by increased overall housing provision. | ++ Reduced target for affordable housing will be offset by increased overall housing provision. | ++ Reduced target for affordable housing will be offset by increased overall housing provision. | ++ Reduced target for affordable housing will be offset by increased overall housing provision. |
| 5. To direct development to more sustainable locations and reduce the need to travel | ++ | ++ | ++ | ++ | ++ | ++ | ++ |
| 6. To strengthen transport links between rural areas and towns, and improve conditions for walking, cycling and travel by public | + | + | + | 0 | ++ | ++ | ++ |

| SA Objective | | Component/Policy | | | | | | |
|--------------|---|--|----------------------|--|-----------|--|--|---|
| | | SS1a Presumption in Favour of Sustainable Development (New Policy) | SS2 Future Provision | SS4 Managing the Release of Housing Land | SS5 Towns | SS5a Leek Area Strategy | SS5b Biddulph Area Strategy | SS5c Cheadle Area Strategy |
| | transport | | | | | | | |
| ENVIRONMENT | 7. Identify. Conserve and enhance biodiversity sites and to maximise opportunities for achieving Biodiversity Action Plan targets | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | 8. To protect and enhance key habitats and species | 0 | 0 | 0 | 0 | ? Presence of key habitats and species unknown for small urban extension sites | + Habitat survey findings do not indicate Area 4 as being unsuitable for development other than protecting habitats along the disused railway line, watercours | + Habitat survey findings do not indicate Area 1 as being unsuitable for development . Suggest protecting the watercourse, and marshy grassland. ? Presence of key habitats and |

| SA Objective | Component/Policy | | | | | | |
|--|--|----------------------|--|---|---|--|---|
| | SS1a Presumption in Favour of Sustainable Development (New Policy) | SS2 Future Provision | SS4 Managing the Release of Housing Land | SS5 Towns | SS5a Leek Area Strategy | SS5b Biddulph Area Strategy | SS5c Cheadle Area Strategy |
| | | | | | | e and the bypass ? Presence of key habitats and species unknown for small urban extension sites | species unknown for small urban extension sites |
| 9. To reduce contamination, regenerate degraded environments and maintain soil resources and quality | + | + | 0 | ++ gives more policy direction than SS1 - loss of soil resources | ++ use of more previously developed sites - loss of soil due to use of greenfield land | + use of previously developed sites - loss of soil due to use of greenfield land | + use of previously developed sites - loss of soil due to use of greenfield land |
| 10. To promote efficient use of resources | 0 | 0 | 0 | I set out in Policy SD1 | I set out in Policy SD1 | I set out in Policy SD1 | I set out in Policy SD1 |

| SA Objective | | Component/Policy | | | | | |
|----------------------------------|----------|--|----------------------|--|--|--|--|
| | | SS1a Presumption in Favour of Sustainable Development (New Policy) | SS2 Future Provision | SS4 Managing the Release of Housing Land | SS5 Towns | SS5a Leek Area Strategy | SS5b Biddulph Area Strategy |
| 11. To reduce energy consumption | 0 | 0 | 0 | - Energy consumption of new development + opportunities for renewable energy & energy efficient buildings | - Energy consumption of new development (including the allocation of small urban extensions rather than a single broad area which could result in increased energy usage) + opportunities for renewable energy & energy efficient buildings | - Energy consumption of new development (including the allocation of small urban extensions rather than a single broad area which could result in increased energy usage) + opportunities for renewable energy & energy efficient buildings | - Energy consumption of new development (including the allocation of small urban extensions rather than a single broad area which could result in increased energy usage) + opportunities for renewable energy & energy efficient buildings |

| SA Objective | Component/Policy | | | | | | |
|--|--|----------------------|--|----------------------------------|--------------------------------------|-----------------------------|---|
| | SS1a Presumption in Favour of Sustainable Development (New Policy) | SS2 Future Provision | SS4 Managing the Release of Housing Land | SS5 Towns | SS5a Leek Area Strategy | SS5b Biddulph Area Strategy | SS5c Cheadle Area Strategy |
| | | | | | | buildings | |
| 12. To reduce flood risk, protect and enhance water sources and environmental assets, and reduce contributions and vulnerability to climate change | 0 | 0 | 0 | 0 | 0 | 0 | - flood risk, small areas affected along watercourses in all of the broad locations + opportunities for inclusion within amenity space |
| 13. To protect and enhance the character of the landscape and townscape, | 0 | 0 | 0 | - new development will impact on | - new development will impact on the | - new development will | - new development will impact |

| SA Objective | | Component/Policy | | | | | | |
|--------------|--|--|---|--|---|--|--|--|
| | | SS1a Presumption in Favour of Sustainable Development (New Policy) | SS2 Future Provision | SS4 Managing the Release of Housing Land | SS5 Towns | SS5a Leek Area Strategy | SS5b Biddulph Area Strategy | SS5c Cheadle Area Strategy |
| | historic assets, and maintain and strengthen local distinctiveness and sense of place | | | | the landscape + opportunities for enhancing the character of the towns | landscape + opportunities for enhancing the character of Leek | impact on the landscape + opportunities for enhancing the character of Biddulph | on the landscape + opportunities for enhancing the character of Cheadle |
| | 14. To encourage further development of tourism and culture | + | ++ | 0 | 0 | ++ | ++ | ++ |
| ECONOMIC | 15. To safeguard the vitality and viability of the District's towns and villages, and create and sustain a vibrant rural economy | + | ++ | 0 | ++ | ++ | ++ | ++ |
| | 16. To strengthen, modernise and diversify the District economy, and sustainable economic growth | + | ++ identifies employment need and amount of provision | 0 | ++ | ++ | ++ | ++ |

| SA Objective | | Component/Policy | | | | | | |
|---|--|--|----------------------|--|-----------|-------------------------|-----------------------------|----------------------------|
| | | SS1a Presumption in Favour of Sustainable Development (New Policy) | SS2 Future Provision | SS4 Managing the Release of Housing Land | SS5 Towns | SS5a Leek Area Strategy | SS5b Biddulph Area Strategy | SS5c Cheadle Area Strategy |
| 17. To encourage and support a high and stable level of employment and variety of jobs to meet local employment needs | | + | ++ | 0 | ++ | ++ | ++ | ++ |

| SA Objective | | Component/Policy | | | | | | |
|--------------|---|---|---|--|--------------------------------------|---|---|-------------------------------------|
| | | SS6 Rural Areas | SS6a Larger Villages Area Strategy | SS6b Smaller Villages Area Strategy | SS6c Other Rural Areas Area Strategy | SS7 Churnet Valley Tourism Corridor | SD1 Sustainable Use of Resources | SD2 Renewable and Low-Carbon Energy |
| SOCIAL | 1. To improve the quality of where people work and live, and minimise risks and nuisances | ++ | ++ | + issue of scale, it is positive for the local economy in terms of supporting facilities and local needs housing | 0 | 0 | + Reduced positive impact to reflect modified requirements of the Policy. | + |
| | 2. To eliminate social exclusion by promoting, maintaining and improving facilities, services and opportunities for all and access to them | + | ++ | 0 due to scale | 0 | + Measures to improve connectivity and accessibility to & within Churnet Valley | + | 0 |
| | 3. To minimise opportunities for crime and reduce the fear of crime | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | 4. To ensure adequate quality and provision of a range of house types to meet local needs in appropriate locations, and maintain and improve the +local housing stock and provision of affordable/ social housing | ++ Less affordable housing will be achieved than previously, however, increased general housing | ++ Less affordable housing will be achieved than previously, however, increased general | ++ meets local need in terms of their size, type and tenure | + meets exceptional local need | 0 | 0 | 0 |

| SA Objective | Component/Policy | | | | | | |
|--|--|------------------------------------|-------------------------------------|---|--|----------------------------------|-------------------------------------|
| | SS6 Rural Areas | SS6a Larger Villages Area Strategy | SS6b Smaller Villages Area Strategy | SS6c Other Rural Areas Area Strategy | SS7 Churnet Valley Tourism Corridor | SD1 Sustainable Use of Resources | SD2 Renewable and Low-Carbon Energy |
| | provision. | housing provision. | | | | | |
| 5. To direct development to more sustainable locations and reduce the need to travel | 0 Proportion of development in the rural areas could slightly increase the need to travel + Most of the development in the rural areas to be directed to the more sustainable larger villages | + | 0 | - due to location of major developed sites | + development required to demonstrate strong sustainable development principles | ++ | 0 |
| 6. To strengthen transport links between rural areas and towns, and improve conditions for walking, cycling and travel by public transport | 0 | 0 | 0 | 0 | + support for links to strategic footpath/ cycle routes. Support for alternative means of access. | 0 | 0 |

| SA Objective | | Component/Policy | | | | | | |
|--------------|--|------------------|--|-------------------------------------|--------------------------------------|---|---|---|
| | | SS6 Rural Areas | SS6a Larger Villages Area Strategy | SS6b Smaller Villages Area Strategy | SS6c Other Rural Areas Area Strategy | SS7 Churnet Valley Tourism Corridor | SD1 Sustainable Use of Resources | SD2 Renewable and Low-Carbon Energy |
| ENVIRONMENT | 7. To identify, conserve and enhance biodiversity sites and to maximise opportunities for achieving Biodiversity Action Plan targets | 0 | 0 | 0 | 0 | ++ support for actions to protect and enhance the biodiversity of the valley, including the maintenance, buffering and connection of designated sites & actions to mitigate climate change. | I Subject to specific requirements in Policy NE1 being met. | 0 Has to comply with Policy NE1 in terms of impact on designated sites of European, national and local biodiversity and geological importance |
| | 8. To protect and enhance key habitats and species | 0 | ? Presence of key habitats and species unknown | 0 | 0 | ++ support for actions to protect and enhance the biodiversity of the valley, including the maintenance, buffering and connection of designated sites & actions to mitigate climate | I Subject to specific requirements in Policy NE1 being met. | 0 |

| SA Objective | Component/Policy | | | | | | |
|--|--|--|-------------------------------------|--|--|---|--|
| | SS6 Rural Areas | SS6a Larger Villages Area Strategy | SS6b Smaller Villages Area Strategy | SS6c Other Rural Areas Area Strategy | SS7 Churnet Valley Tourism Corridor | SD1 Sustainable Use of Resources | SD2 Renewable and Low-Carbon Energy |
| | | | | | change. | | |
| 9. To reduce contamination, regenerate degraded environments and maintain soil resources and quality | - loss of soil resources due to use of green field sites | + use of previously developed sites - loss of soil due to use of greenfield sites | 0 | ++ regenerate underused major developed sites and re-use of rural buildings | + potential for re-use of existing buildings / previously developed sites | ++ still considered to have a significant positive impact despite modifications relaxing standards | 0 |
| 10. To promote efficient use of resources | ! set out in Policy SD1 + re-use of rural buildings | ! depends on details contained in Policy SD1 | 0 | + re-use of rural buildings | ! set out in Policy SD1 | ++ | ++ Emphasis on renewable/low carbon energy which utilises less raw materials and has lower carbon emissions during operation than traditional |

| SA Objective | Component/Policy | | | | | | |
|--|--|--|-------------------------------------|---|--|---|--|
| | SS6 Rural Areas | SS6a Larger Villages Area Strategy | SS6b Smaller Villages Area Strategy | SS6c Other Rural Areas Area Strategy | SS7 Churnet Valley Tourism Corridor | SD1 Sustainable Use of Resources | SD2 Renewable and Low-Carbon Energy |
| | | | | | | | energy sources. |
| 11. To reduce energy consumption and waste production. And facilitate renewable energy | - Energy consumption of new development + opportunities for renewable energy & energy efficient buildings | - Energy consumption of new development + opportunities for renewable energy & energy efficient buildings | 0 due to scale of development | + opportunities for renewable energy & energy efficient buildings on brownfield sites | - Energy consumption of new development + opportunities for renewable energy & energy efficient buildings | + Modified Policy considered to have reduced positive impact. | + + Emphasis on renewable/low carbon energy which utilises less raw materials and has lower carbon emissions during operation than traditional energy sources. |
| 12. To reduce flood risk, protect and enhance water sources and environmental assets, and reduce contributions and vulnerability to climate change | 0 | 0 | 0 | 0 | ! depends on advice from Environment Agency | + Modified Policy considered to have reduced positive impact. | + + Lower-carbon forms of energy reduce vulnerability to/better mitigate |

| SA Objective | Component/Policy | | | | | | |
|--|--|---|-------------------------------------|---|--|----------------------------------|---|
| | SS6 Rural Areas | SS6a Larger Villages Area Strategy | SS6b Smaller Villages Area Strategy | SS6c Other Rural Areas Area Strategy | SS7 Churnet Valley Tourism Corridor | SD1 Sustainable Use of Resources | SD2 Renewable and Low-Carbon Energy |
| | | | | | | | climate change |
| 13. To protect and enhance the character of the landscape and townscape, historic assets, and maintain and strengthen local distinctiveness and sense of place | - new development will impact on the landscape + opportunities for enhancing the character of settlements | - increased level of housing could have greater impact on the green belt and landscape surrounding villages + opportunities for enhancing the character of settlements | + | ++ limits scale of development, protects character of landscape | ++ promotes development that is sensitive to the heritage, landscape and biodiversity. Importance attached to landscape character. | 0 | I Depends on the proposed location/appearance/noise outputs/landscaping etc of proposals; and whether there are cumulative impacts. |
| 14. To encourage further development of tourism and culture | ++ | ++ | 0 | ++ enhanced tourist facilities and rural diversification | ++ promotes sustainable tourism development in the Churnet Valley area | 0 | 0 |

| SA Objective | | Component/Policy | | | | | | |
|--------------|--|------------------|------------------------------------|-------------------------------------|--------------------------------------|-------------------------------------|----------------------------------|--|
| | | SS6 Rural Areas | SS6a Larger Villages Area Strategy | SS6b Smaller Villages Area Strategy | SS6c Other Rural Areas Area Strategy | SS7 Churnet Valley Tourism Corridor | SD1 Sustainable Use of Resources | SD2 Renewable and Low-Carbon Energy |
| ECONOMIC | 15. To safeguard the vitality and viability of the District's towns and villages, and create and sustain a vibrant rural economy | ++ | ++ | + | + | + | 0 | 0 |
| | 16. To strengthen, modernise and diversify the District economy, and promote sustainable economic growth | ++ | ++ | 0 due to scale | + | + | 0 | + Economic benefits associated with renewables in terms of lower energy bills; potential for savings to be re-invested and potential stimulation of renewables manufacturer /installation sector |
| | 17. To encourage and support a high and stable level of employment and variety of jobs to meet local employment needs | ++ | ++ | 0 due to scale | + | + | 0 | + Economic benefits associated with |

| SA Objective | Component/Policy | | | | | | |
|--------------|------------------|------------------------------------|-------------------------------------|--------------------------------------|-------------------------------------|----------------------------------|--|
| | SS6 Rural Areas | SS6a Larger Villages Area Strategy | SS6b Smaller Villages Area Strategy | SS6c Other Rural Areas Area Strategy | SS7 Churnet Valley Tourism Corridor | SD1 Sustainable Use of Resources | SD2 Renewable and Low-Carbon Energy |
| | | | | | | | renewables in terms of lower energy bills; potential for savings to be re-invested and potential stimulation of renewables manufacturer /installation sector |

| | | SD3 Carbon-Saving Measures (New Policy) | E1 New Employment Development | E3 Tourism and Cultural Facilities | H2 Affordable and Local Needs Housing | Policy H3 Gypsy and Traveller Sites | Policy R2 Rural Housing | |
|--------|---|--|-------------------------------|------------------------------------|---------------------------------------|---|-------------------------|---|
| SOCIAL | 1. To improve the quality of where people work and live, and minimise risks and nuisances | + social benefits associated with implementation of such schemes e.g. reduced heating bills and reduction of fuel poverty in rural areas | ++ | + | ++ | ++ | + | |
| | 2. To eliminate social exclusion by promoting, maintaining and improving facilities, services and opportunities for all and access to them | 0 | ++ | + | ++ | ++ | 0 | |
| | 3. To minimise opportunities for crime and reduce the fear of crime | 0 | depends on design | 0 | depends on design | 0 | 0 | |
| | 4. To ensure adequate quality and provision of a range of house types to meet local needs in appropriate locations, and maintain and improve the +local housing stock and provision of affordable/ social housing | + opportunities to improve housing stock with energy saving – supportive of retrofitting | 0 | 0 | 0 | + affordable housing will be achieved although the amount will be reduced compared to previous target | ++ | ++ still considered to have a significant positive impact although this will be slightly less than before |
| | 5. To direct development to more sustainable locations and reduce the need to travel | 0 | ++ | + | 0 | 0 | 0 | |

| | | SD3 Carbon-Saving Measures (New Policy) | E1 New Employment Development | E3 Tourism and Cultural Facilities | H2 Affordable and Local Needs Housing | Policy H3 Gypsy and Traveller Sites | Policy R2 Rural Housing |
|-------------|--|--|--|------------------------------------|---------------------------------------|--|-------------------------|
| | 6. To strengthen transport links between rural areas and towns, and improve conditions for walking, cycling and travel by public transport | 0 | 0 | + | 0 | 0 | 0 |
| ENVIRONMENT | 7. To identify, conserve and enhance biodiversity sites and to maximise opportunities for achieving Biodiversity Action Plan targets | 0 | 0 | 0 | 0 | 0 | 0 |
| | 8. To protect and enhance key habitats and species | 0 | ? Presence of key habitats and species unknown | 0 | 0 | 0 Site proposals would have to conform to wider Policies, including NE1 | 0 |
| | 9. To reduce contamination, regenerate degraded environments and maintain soil resources and quality | 0 | + use of previously developed sites - loss of soil due to use of greenfield sites | 0 | 0 | 0 | 0 |
| | 10. To promote efficient use of resources | ++ Emphasis on renewable or low carbon energy / energy efficiency | ! set out in Policy SD1 | 0 | 0 | 0 Although Policy SD1 would still apply | 0 |
| | 11. To reduce energy | + Supports micro- | - energy | 0 | 0 | 0 Although | 0 |

| | | SD3 Carbon-Saving Measures (New Policy) | E1 New Employment Development | E3 Tourism and Cultural Facilities | H2 Affordable and Local Needs Housing | Policy H3 Gypsy and Traveller Sites | Policy R2 Rural Housing |
|--|--|---|--|------------------------------------|---------------------------------------|-------------------------------------|-------------------------|
| | consumption and waste production. And facilitate renewable energy | renewables, and lower-carbon forms of energy to serve development, ie lower resource/waste impacts | consumption of new development + opportunities for renewable energy and energy efficient buildings | | | Policy SD1 would still apply | |
| | 12. To reduce flood risk, protect and enhance water sources and environmental assets, and reduce contributions and vulnerability to climate change | ++ Reduces vulnerability to climate change | 0 | 0 | 0 | 0 | 0 |
| | 13. To protect and enhance the character of the landscape and townscape, historic assets, and maintain and strengthen local distinctiveness and sense of place | 0 although measures are only promoted subject to acceptability against wider Policies, including design/character policies. | + precludes detrimental impact on local amenity, character and appearance of area in existing employment areas | ++ | 0 | 0 | 0 |
| | 14. To encourage further development of tourism and culture | 0 | 0 | ++ | 0 | 0 | 0 |

| | | SD3 Carbon-Saving Measures (New Policy) | E1 New Employment Development | E3 Tourism and Cultural Facilities | H2 Affordable and Local Needs Housing | Policy H3 Gypsy and Traveller Sites | Policy R2 Rural Housing |
|----------|--|--|---|------------------------------------|---------------------------------------|-------------------------------------|-------------------------|
| ECONOMIC | 15. To safeguard the vitality and viability of the District's towns and villages, and create and sustain a vibrant rural economy | 0 | ++ | + | 0 | 0 | 0 |
| | 16. To strengthen, modernise and diversify the District economy, and promote sustainable economic growth | + Economic benefits associated with energy efficiency in terms of lower bills and stimulation of local micro-renewables suppliers etc | ++ Support for redevelopment, intensification & improvement of existing employment areas | + | 0 | 0 | 0 |
| | 17. To encourage and support a high and stable level of employment and variety of jobs to meet local employment needs | 0 although could stimulate local micro-renewables suppliers etc | ++ | + | 0 | 0 | 0 |

6. Summary of Impacts

- 6.1 The following section summarises the impact of the new policies and where there are proposed changes to previous policies identified in Section 5 on sustainability.

New Policy SS1a (Presumption in Favour of Sustainable Development (New Policy))

- 6.2 This new policy is likely to have a positive effect particularly across the social and economic objectives. No negative impacts have been identified.

Policies SS5 (Towns), SS5a (Leek Area Strategy), SS5b (Biddulph Area Strategy), SS5c (Cheadle Area Strategy), SS6 (Rural Areas), SS6a (Larger Villages Area Strategy)

- 6.3 The increase to the overall housing provision has had a slightly increased positive effect on SA Objective 4 in terms of providing a choice and range of housing and supporting existing services and facilities. However this is counterbalanced by a reduction of affordable housing targets although this may be offset by the overall increase in housing. Overall there is not considered to be a change to the overall impact compared to the previous assessment which is still considered to be significantly positive. See Policy H2 below.

Policy SS6 (Rural Areas)

- 6.4 The increase in housing provision could slightly increase the need to travel however the larger villages have a good range of facilities and services and bus services. Overall there is not considered to be a change to the overall impact compared to the previous assessment.

Policies SS5b (Biddulph Area Strategy) and SS6a (Larger Villages Area Strategy)

- 6.5 The increase in housing provision in the rural area could slightly increase the impact on surrounding green belt and landscape surrounding the larger villages however this is not seen to be significantly negative. It will be particularly important to maximise opportunities within existing settlement boundaries and draw on evidence contained within the Landscape and Settlement Character Assessment.

Policy SS7 (Churnet Valley Area Strategy)

- 6.6 Modifications to the policy have resulted in a positive impact for SA Objective 2 as the policy supports measures to improve accessibility and connectivity and also to developing links to strategic footpaths, cycle and horse riding routes. Modifications have also had a greater positive impact on SA 7 and 8 as the policy has strengthened support for protection and enhancement of biodiversity and designated sites. SA Objective 13, the consideration of landscape character is

also strengthened, however this impact was already considered to be significantly positive and therefore cannot be scored any higher.

Policy SD1 (Sustainable Use of Resources)

- 6.7 The amended Policy has removed certain requirements (brownfield targets; recycled building materials target; meeting 'Building for Life' requirements; exceeding normal water conservation standards); and has introduced a threshold for the submission of Sustainability Statements. However it is still considered that this policy has an overall positive impact despite modifications because it clearly sets out the Council's expectations regarding brownfield prioritisation, and site orientation to minimise energy needs; whilst also supporting contaminated land remediation, water conservation, and waste materials recycling.

Policy SD2 (Renewable and Low-Carbon Energy)

- 6.8 Previous policy SD2 has been split into revised policy SD2 and new policy SD3 and therefore the scoring has changed to reflect this. Stand alone renewables can have both negative and positive impacts. Negative impacts include their impact on landscape and townscape, heritage and conservation assets etc (which depends on location, scale/external appearance and whether there would be 'cumulative' impacts etc); and impacts upon neighbour amenity (noise, shadowing etc). But these are counterbalanced by a number of positive impacts. Firstly stand alone renewables provide greater climate change mitigation because of reduced carbon emissions. They can also have local(wider) economic benefits associated with reducing energy costs of enterprises (for example by freeing up more disposable income; or because savings can be financially re-invested, such as farm diversification). In the longer term greater supply of installations also stimulates the renewables manufacturing sector. The policy also takes landscape sensitivity into account and directs that decisions be made on a case by case basis by balancing positive impacts against (minimised) negative impacts.

New Policy SD3 (Carbon-Saving Measures in Development (New Policy))

- 6.9 This policy is considered to have positive impacts particularly relating to promoting efficient use of resources, reducing energy consumption and improving the energy efficiency of both new and existing buildings. It also clearly expresses the Council's general support for introducing/expanding district heating networks.

Policy E1 (New Employment Development)

- 6.10 It is considered that the modification to this policy will protect the local amenity, character and appearance of areas.

Policy H2 (Affordable Housing and Local Needs Housing)

- 6.11 The change to the affordable housing target means that the significantly positive impact that this policy previously scored has been reduced to a positive impact.

The policy does however acknowledge that targets will be reviewed for the period after 2016.

Policy H3 (Gypsy and Traveller Sites)

- 6.12 Although the modified Policy has removed the requirement for applicants' 'need' for accommodation to first be demonstrated; the Policy is still considered to have a significant positive impact because it is founded upon sustainability principles; and that harm to natural, historic assets etc be avoided when providing traveller sites. It also sets out to satisfy the distinct accommodation needs of travellers required by law; and combat social exclusion experienced by these groups in terms of accessibility to facilities, health, education services etc.

Policies SS2 (Future Provision of Development), SS4 (Managing the Release of Housing Land), SS6b (Smaller Villages Area Strategy), SS6c (Other Rural Areas Area Strategy), E3 (Tourism and Cultural Development), H3 (Gypsy and Traveller Sites) and R2 (Rural Housing)

- 6.12 Although modifications to these policies are proposed the impacts of the changes are not considered to be significant enough to change the scoring from the previous version of the policy.

7. Cumulative Impact of Plan including Modifications

7.1 This table should be read in conjunction with Section Q – ‘Assessment of the Components of the Revised Submission Version of the Core Strategy – Cumulative Effects’ which can be found in the Staffordshire Moorlands Core Strategy Sustainability Appraisal of the Revised Submission Version Update August 2012 (Examination Document I11).

- + = Positive + + = Significantly Positive - - = Significantly Negative
 - = Negative
 0 = Neutral (no significant positive or negative effects)
 ? = Impact Unknown
 I = Impact dependent on how implemented

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

| SA Objectives | Short Term (less than 1 year) | Medium Term (1-5 years) | Long Term (5 years or more) | Summary of Appraisal |
|---------------|-------------------------------|-------------------------|-----------------------------|--|
| Social | - / + | + | ++ | Positive effect over time as growth is focused in the towns and larger villages resulting in improved services/facilities and strengthening the retail offer in the towns. Provision of additional dwellings including affordable housing will provide more choice and meet the needs of local residents - although the amount of affordable housing achieved is likely to be less due to reduced target. Increase in employment land will provide locations for new and expanding businesses and greater opportunity to work locally. All of these positive effects generally direct development to more sustainable locations and reduce the need to travel. Car use in the District remains high and improvements to the public transport network should be sought wherever possible. |

| | | | | |
|--------------------|--------|--------|--------|--|
| Environment | -- / + | - / ++ | - / ++ | The cumulative effect on the environmental objectives are varied. This is mainly due to the effect of new development in terms of energy consumption, use of building materials, use of greenfield sites and impact on the character of the landscape and townscape. There are however some positive effects such as encouraging further development of tourism and culture and opportunities for renewable energy and energy efficient buildings. The increased level of housing could have a greater impact on the green belt and landscape, particularly surrounding Biddulph and the larger villages. This may become less significant in the medium to long term. |
| Economic | ++ | ++ | ++ | The assessment shows the document has a significantly positive effect on the economic objectives. Provision of a range of sites across the District combined with the protection of suitable employment sites will safeguard the vitality and viability of the towns and larger settlements. The increase in the range of units will attract new employers and allow existing businesses to expand. There is an on-going need to ensure that the District's workforce skills match local employment opportunities. |

8. Habitat Regulations Assessment

- 8.1 In line with European Union Legislation, Appropriate Assessment of the Staffordshire Moorlands Core Strategy has previously taken place. In May 2008, assessment of the Draft Preferred Options was published. Updates to the Appropriate Assessment to reflect changes made in the addendum to the Core Strategy Submission Version and the Revised Submission Version of the Core Strategy have since taken place. This current update has been produced to look at any impacts of the main modifications on European sites. This report should be read alongside all previously published reports (Documents I(2), I(3), I(5) and I(8) in the Examination Library) as these explain the methodology used in detail.
- 8.2 Table 1 (below) reviews the main modifications to the Core Strategy in relation to European protected sites using the same screening system as the previous assessments:

| | |
|-----------|---|
| √√ | Clear strong positive effects |
| √ | Broadly Supportive |
| 0 | Neutral or no discernible effect |
| X | Likely negative effect |
| ?x | Uncertain possible negative effect |

- 8.3 This table takes the same form as it did in the previous update so comparisons can be easily made. The table excludes Core Strategy policies that are not part of the main modifications. Refer to the previous document for assessment of these (Document I(8)). Please note that the assessment has been undertaken on the main modification alone and not the policy as a whole so refer back to the previous document for the whole policy assessment.

Table 1 Review of Core Strategy Main Modifications in Relation to European Protected Sites

| Core Strategy Policy | Policy alterations that have the potential to adversely impact on European Sites | Summary impact of the change on SPA and SAC Sites | | | |
|--|--|---|-------------------------|---|-------------------|
| | | South Pennine Moors SAC | Peak District Dales SAC | Peak District Moors (South Pennine Moors Phase 1) SPA | Cannock Chase SAC |
| SS1a Presumption in Favour of Sustainable Development | New policy reflecting presumption in favour of sustainable development set out in the NPPF. This policy will have an overall positive influence on protecting European Sites. | √ | √ | √ | √ |
| SS2 Future Provision of Development | <p>The changes to this policy include:</p> <ul style="list-style-type: none"> An increase in housing provision from 5500 to 6000 additional dwellings to be completed in the Staffordshire Moorlands during the period 2006 to 2026. Reference to the affordable housing target as part of the overall housing provision has been removed. A commitment to an early review of the Core Strategy which will be rolled into a single Local Plan combined with the Site Allocations DPD. Changes to the development rates post 2016 (supported by additional evidence). <p>A potential impact could arise if these additional dwellings are inappropriately situated.</p> | ?x | ?x | ?x | 0 |
| SS4 Managing the Release of Housing Land | New paragraph added to confirm that the Strategic Housing Land Availability Assessment (SHLAA) will identify specific deliverable sites sufficient for 5 years supply of housing and an additional | 0 | 0 | 0 | 0 |

| | | Summary impact of the change on SPA and SAC Sites | | | |
|-----------------------------|---|---|-------------------------|---|-------------------|
| Core Strategy Policy | Policy alterations that have the potential to adversely impact on European Sites | South Pennine Moors SAC | Peak District Dales SAC | Peak District Moors (South Pennine Moors Phase 1) SPA | Cannock Chase SAC |
| | buffer of 5% or 20% where appropriate. | | | | |
| SS5 Towns | The increase in the housing requirement in Policy SS2: Future Provision of Development is reflected in increased figures for the three towns. A potential impact could arise if these additional dwellings are inappropriately situated, particularly around Leek. | ?x | ?x | ?x | 0 |
| SS5a Leek Area Strategy | Minor amendment to reflect changes to Policy SS7: Churnet Valley Area Strategy. | 0 | 0 | 0 | 0 |
| SS5b Biddulph Area Strategy | An amendment has been made to this policy to clarify that the small urban extensions in the green belt will be identified as part of a review of the green belt boundary through the Site Allocations DPD and the review of the Core Strategy. This is just a point of clarification. | 0 | 0 | 0 | 0 |
| SS5c Cheadle Area Strategy | The extension to the urban area to the north east of Cheadle (Area 2) has been deleted. The policy states that the Council will assess the need for other broad locations through the review of the Core Strategy. References to the need for a bypass and other infrastructure improvements have been moved to the supporting text. This change has not been classified as having a positive effect as it does not change the original situation i.e. that new housing sites need to be identified in Cheadle. | 0 | 0 | 0 | 0 |
| SS6 Rural Areas | The increase in the housing requirement in Policy SS2: Future Provision of Development is reflected in increased figures for the rural area. A potential impact could arise if these additional | ?x | ?x | ?x | 0 |

| | | Summary impact of the change on SPA and SAC Sites | | | |
|--------------------------------------|---|---|-------------------------|---|-------------------|
| Core Strategy Policy | Policy alterations that have the potential to adversely impact on European Sites | South Pennine Moors SAC | Peak District Dales SAC | Peak District Moors (South Pennine Moors Phase 1) SPA | Cannock Chase SAC |
| | dwellings are inappropriately situated. | | | | |
| SS6a Larger Villages | A minor change has been made to the text to refer to 'built-up' area rather than 'urban' area to provide a clearer description. | 0 | 0 | 0 | 0 |
| SS6b Smaller Villages | An amendment has been made to this policy so that new housing in smaller villages no longer has to meet an 'essential local need' as required in the countryside, but there is still a need to meet a 'local need'. | 0 | 0 | 0 | 0 |
| SS6c Other Rural Areas Area Strategy | Amendments to this policy include: <ul style="list-style-type: none"> Clarification to include the types of housing development that would be acceptable in the countryside and green belt. Deletion of the reference to Blythe Business Park as expansion and redevelopment of existing businesses are covered by general guidance under Policy E1: New Employment Development. Amendment to text in part 5 relating to the Churnet Valley which reflects changes to Policy SS7: Churnet Valley Area Strategy. Amendment to clarify the process for undertaking a review of the green belt boundaries. | 0 | 0 | 0 | 0 |
| | Amendments include: <ul style="list-style-type: none"> Changing the title of the policy to exclude the term 'tourism corridor'; Changes to clarify the aims of the strategic policy for the | √ | √ | √ | √ |

| | | Summary impact of the change on SPA and SAC Sites | | | |
|----------------------------------|--|---|-------------------------|---|-------------------|
| Core Strategy Policy | Policy alterations that have the potential to adversely impact on European Sites | South Pennine Moors SAC | Peak District Dales SAC | Peak District Moors (South Pennine Moors Phase 1) SPA | Cannock Chase SAC |
| SS7 Churnet Valley Area Strategy | <p>Churnet Valley;</p> <ul style="list-style-type: none"> Guidance on the broad principles of development which the Council would support; and Stronger emphasis on the considerations regarding impact on the natural environment etc. | | | | |
| SD1 Sustainable Use of Resources | <p>This policy has been amended so that:</p> <ul style="list-style-type: none"> Previously developed land targets have been deleted; It has clarified circumstances for development on previously developed land and greenfield sites; Only major-scale planning applications will need to provide a Sustainability/Energy Statement (originally most applications needed this); It is no longer required that the 'Building for Life' tool standards are applied to new developments, although the benefits will be incorporated into the supporting text. The target of 25% of minerals used from recycled / reused content in new-build schemes has been deleted and replaced with the need for developers to investigate the potential; The reference to site waste management plans has been removed as these are covered by separate legislation; There is no longer a requirement that all new development achieves the highest viably possible water conservation | 0 | 0 | 0 | 0 |

| | | Summary impact of the change on SPA and SAC Sites | | | |
|--|---|---|-------------------------|---|-------------------|
| Core Strategy Policy | Policy alterations that have the potential to adversely impact on European Sites | South Pennine Moors SAC | Peak District Dales SAC | Peak District Moors (South Pennine Moors Phase 1) SPA | Cannock Chase SAC |
| | <p>standards; however the Council's support for elevated water conservation standards remains.</p> <ul style="list-style-type: none"> Reference to how all new development should consider Sustainable Drainage Systems has been removed. <p>Although this policy has been diluted by these amendments, it is not considered that their impact is likely to have a negative impact on habitats.</p> | | | | |
| SD2 Renewable & Low Carbon Energy | <p>In order to improve clarity, the previous Policy SD2 has been subdivided into two separate policies: the first Policy 'Renewable and Low-Carbon Energy' is the new SD2 Policy – this carries forward the Policy about stand-alone renewables from Part (1) of the original Policy. This is unchanged apart from the removal of the requirement for considering brownfield sites first by demonstrating that there are no viable brownfield sites where renewables (e.g. wind turbines) could be located. In reality such development tends to be located on greenfield sites where the natural resource (e.g. wind) is available rather than on brownfield sites so the impact of this amendment is considered to be negligible. The second Policy (new "SD3") 'Carbon-Saving Measures in New Development' is set out below.</p> | 0 | 0 | 0 | 0 |
| SD3 Carbon-Saving Measures in | <p>This Policy consolidates Parts (2-5) of original Policy SD2; but the original requirements from these Parts have been substantially reworded to:</p> | 0 | 0 | 0 | 0 |

| | | Summary impact of the change on SPA and SAC Sites | | | |
|--|---|---|-------------------------|---|-------------------|
| Core Strategy Policy | Policy alterations that have the potential to adversely impact on European Sites | South Pennine Moors SAC | Peak District Dales SAC | Peak District Moors (South Pennine Moors Phase 1) SPA | Cannock Chase SAC |
| New Development | <ul style="list-style-type: none"> Remove requirements/expectations upon developers that were considered over-onerous, not justified by evidence, unclear/imprecise, or not required because of other legislation (i.e.: the elevating of thermal efficiency standards in new development; elevating sustainability standards even further upon major-scale sites; and the investigation of District Heating opportunities off-site for major-scale sites;); and More clearly give an indication of those measures that the Council will support. | | | | |
| E1 New Employment Development | Policy amended to include general guidance for the redevelopment, intensification or improvement of existing employment sites. | 0 | 0 | 0 | 0 |
| E3 Tourism & Cultural Development | Policy amended to provide greater clarity on those forms of tourism and cultural development which are appropriate and to reflect modifications to Policy SS7 (Churnet Valley). | 0 | 0 | 0 | 0 |
| H2 Affordable Housing & Local Needs Housing | This policy has been amended to reflect a reduced scale of 33% affordable housing obligations to 2016 to be consistent with the current evidence of viability. This was previously 40% in the towns and 50% in the larger villages. This target will be reviewed from 2016. Removed requirement for all housing in rest of rural areas to be either affordable or meet a local need which cannot be met elsewhere. | 0 | 0 | 0 | 0 |

| | | Summary impact of the change on SPA and SAC Sites | | | |
|----------------------------|---|---|-------------------------|---|-------------------|
| Core Strategy Policy | Policy alterations that have the potential to adversely impact on European Sites | South Pennine Moors SAC | Peak District Dales SAC | Peak District Moors (South Pennine Moors Phase 1) SPA | Cannock Chase SAC |
| H3 Gypsy & Traveller Sites | The requirement for applicants to first prove a 'need' when determining planning applications for gypsy and traveller sites has been deleted. | 0 | 0 | 0 | 0 |
| R2 Rural Housing | The removal of the requirement for conversions to be affordable or meet an identified local need. | 0 | 0 | 0 | 0 |

Appraisal of Core Strategy Changes raising Possible Negative Impacts

- 8.4 The main modifications have resulted in a number of policy changes to the Core Strategy (detailed above), most of which have been deemed to have no impact on European sites. The policy areas which have raised issues in terms of 'uncertain possible negative effects' and therefore require further assessment are:

Policy SS2 Future Provision of Development

- 8.5 A possible negative impact has been identified as a result of the increased amount of housing development proposed in this policy as a result of the main modifications. A potential impact could arise if these additional dwellings are inappropriately situated in relation to the European sites.

Policy SS5 - Towns

- 8.6 The increase in the housing requirement in Policy SS2: Future Provision of Development is reflected in higher housing figures for the three towns. A potential impact could arise if these additional dwellings are inappropriately situated in relation to the European sites, particularly around Leek.

Policy SS6 – Rural Areas

- 8.7 A possible negative impact has been identified as a result of the increased amount of housing allocated to the rural areas depending on where additional developments in the rural areas are situated in relation to the European sites.
- 8.8 Table 2 (which follows) appraises potential mitigation measures within Core Strategy policy and demonstrates that the risk to European sites is neutralised through these policy measures.

Table 2: Summary of the Appraisal of the Core Strategy Changes

| Core Strategy Policy | Potential Impact of Policy on Integrity of European Sites | | | | Mitigation | Residual Effect on Site Integrity |
|---|---|-------------------------|---|-------------------|---|---|
| | South Pennine Moors SAC | Peak District Dales SAC | Peak District Moors (South Pennine Moors Phase 1) SPA | Cannock Chase SAC | | |
| <p>SS2 – Future Provision of Development</p> | <p>Increasing the housing provision for the District from 5500 to 6000 may result in a negative impact depending on where additional developments in the District are situated in relation to the European sites.</p> <p>As the precise location of these additional dwellings will not be identified in the Core Strategy, this uncertainty will remain until the Site Allocations DPD is progressed. At that point, further assessment will be undertaken to determine whether there are any adverse impacts on European sites.</p> | | | | <p>The application of core strategy policy NE1 will neutralise the potentially negative impacts stated, in particular:</p> <p>point 1: <i>“any proposed development that could have an adverse effect on the integrity of a European site [will be resisted]”</i></p> <p>point 5: <i>“ensuring development promotes the appropriate maintenance, enhancement, restoration and/recreation of biodiversity”</i> and point 7: <i>“recognising</i></p> | <p>None – the application of these policies should remove the risk.</p> |

| Core Strategy Policy | Potential Impact of Policy on Integrity of European Sites | | | | Mitigation | Residual Effect on Site Integrity |
|----------------------|--|---|---|--|--|-----------------------------------|
| | South Pennine Moors SAC | Peak District Dales SAC | Peak District Moors (South Pennine Moors Phase 1) SPA | Cannock Chase SAC | | |
| | | | | | <p><i>the value of the natural environment for sport and leisure activities and the need to manage such activities to ensure there is no conflict"</i></p> <p>In addition to this policy SS1 provides overarching mitigation by requiring: <i>"development to be undertaken in a way that protects and enhances the natural and historic environment of the District and its surrounding areas both now and for future generations"</i></p> | |
| SS5 - Towns | The increase in the housing requirement in Policy SS2: Future Provision of Development has | No additional issues raised by changes to | No additional issues raised by changes to | The application of core strategy policy NE1 will neutralise the | None, the application of these | |

| Core Strategy Policy | Potential Impact of Policy on Integrity of European Sites | | | Mitigation | Residual Effect on Site Integrity | |
|----------------------|--|-------------------------|---|------------------------------|--|---|
| | South Pennine Moors SAC | Peak District Dales SAC | Peak District Moors (South Pennine Moors Phase 1) SPA | Cannock Chase SAC | | |
| | <p>resulted in a higher number of dwellings being needed in the towns. A potential impact could arise if these additional dwellings are inappropriately situated, particularly around Leek. However it is Biddulph which will be most affected in terms of the need to find new housing land due to a lower level of housing completions over the plan period so far.</p> <p>Uncertainty of the impact of this change on European Sites remains as the locations of the small urban housing extensions will not be identified in the Core Strategy. At the time site allocations are being progressed, further assessment will be undertaken to determine whether there are any adverse impacts on European sites.</p> | | <p>policy at this stage.</p> <p>An issue relating to new development in general and its potential impact on key species raised previously is still applicable: ‘the movement of golden plover between upland grasslands and coastal feeding areas could potentially be disrupted by inappropriate development. The previous assessment stated that development will have to be of a</p> | <p>policy at this stage.</p> | <p>potentially negative impacts stated, in particular:</p> <p>point 1: <i>“any proposed development that could have an adverse effect on the integrity of a European site [will be resisted]”</i></p> <p>point 5: <i>“ensuring development promotes the appropriate maintenance, enhancement, restoration and/recreation of biodiversity”</i> and point 7: <i>“recognising the value of the natural environment for sport and leisure activities and the need to manage such</i></p> | <p>policies should remove the risk.</p> |

| Core Strategy Policy | Potential Impact of Policy on Integrity of European Sites | | | Mitigation | Residual Effect on Site Integrity |
|--------------------------|---|-------------------------|---|---|--|
| | South Pennine Moors SAC | Peak District Dales SAC | Peak District Moors (South Pennine Moors Phase 1) SPA | | |
| | | | scale and nature appropriate to the surroundings. | | <i>activities to ensure there is no conflict"</i> In addition to this policy SS1 provides overarching mitigation by requiring: <i>"development to be undertaken in a way that protects and enhances the natural and historic environment of the District and its surrounding areas both now and for future generations"</i> |
| SS6 – Rural Areas | The increase in the housing requirement in Policy SS2: Future Provision of Development has resulted in a higher number of dwellings being needed in the rural areas i.e. outside the 3 towns. A potential impact could arise if these additional dwellings are inappropriately situated particularly in villages close to the Peak Park. Uncertainty of the impact of this change on European Sites remains as the location of any housing in the rural areas will not be identified in the Core | | | Core Strategy policies SS6a, SS6b and SS6c lay out highly specific criteria on where rural housing development can take place. Specifically, | None, the application of these policies should remove the risk. |

| Core Strategy Policy | Potential Impact of Policy on Integrity of European Sites | | | | Mitigation | Residual Effect on Site Integrity |
|----------------------|---|-------------------------|---|-------------------|--|-----------------------------------|
| | South Pennine Moors SAC | Peak District Dales SAC | Peak District Moors (South Pennine Moors Phase 1) SPA | Cannock Chase SAC | | |
| | <p>Strategy. At the time site allocations are being progressed, further assessment will be undertaken to determine whether there are any adverse impacts on European sites.</p> | | | | <p>SS6c includes a measure to ensure that development “<i>enhances and conserves the quality of the countryside</i>” and to apply Appropriate Assessment and rigorous Environmental Impact Assessment on any development that could potentially affect a European Site. In combination with the mitigation contained within policy NE1 and SS1 any potential negative impact of this policy will be neutralised.</p> | |

9. Conclusions

Sustainability Appraisal

- 9.1 No conflicts have been identified in Section 4 between the modified and new policies and the other policies in the plan.
- 9.2 The modifications are not considered to alter the Equality Impact Assessment. This can be found in Section T – the Staffordshire Moorlands Core Strategy Sustainability Appraisal of the Revised Submission Version Update August 2012 (Examination Document I11).
- 9.3 The summary of the positive impacts on sustainability identified in the appraisal arising from the modifications relate to:
- the new policy on the presumption in favour of sustainable development in terms of securing development that improves the social, environmental and economic conditions of the area;
 - the overall increase in the supply of new housing which will provide a choice and range of housing and support existing services and facilities;
 - increased protection of the biodiversity and landscape character of the Churnet Valley and measures to improve connectivity and accessibility;
 - general guidance for existing employment sites to protect the amenity, character or appearance of the area.
- 9.4 The summary of the negative impacts identified in the appraisal arising from the modifications relate to:
- the reduction of the affordable housing target – although this may be offset by the increase in overall housing provision and will, in any event, be reviewed for the period after 2016.
 - a potential increase in the impact on green belt and the surrounding countryside particularly in Biddulph and the larger villages as a consequence of increase housing numbers. It will therefore be particularly important to maximise opportunities within existing settlement boundaries and draw on evidence contained within the Landscape and Settlement Character Assessment.
 - more housing in the rural area could increase the need to travel. It will be particularly important to support and retain facilities and services for local residents and ensure that there are alternative means of transport to the private car.
 - The removal of a number of the original requirements regarding improving the sustainability of new development under Policies SD1 & SD2 has arguably ‘watered down’ their positive impacts; however the Council's position of support for such measures remain.
- 9.5 The main modifications propose the deletion of Area 2 in Cheadle for residential development. The proposed amendment to Policy SS5c states that the Council will assess the need for other broad locations through the review of the Core Strategy. Therefore no new or previously considered broad locations are

included in the modifications and an assessment of broad locations has not been included in this update. It is intended, in autumn 2013, to update the sustainability appraisal scoping report and the methodology for appraising potential development sites prior to producing a Site Allocations Development Plan Document (DPD) Options Report. The review of the Core Strategy will incorporate the Site Allocations DPD to form a single Local Plan.

- 9.6 The modifications are not considered to change the overall cumulative impacts of the plan over time. A summary of the cumulative impacts is included in Section 7 and the complete table can be found in Section Q - the Staffordshire Moorlands Core Strategy Sustainability Appraisal of the Revised Submission Version Update August 2012 (Examination Document I11).

Habitat Regulations Assessment

- 9.7 Assessment at this stage has focussed on one main area where possible policy changes could have triggered an effect on European sites, namely increasing the future provision of development in the District from 5500 dwellings to 6000 dwellings.
- 9.8 In terms of changes to the District wide housing requirements, the 6000 figure was the original figure used in the earlier Submission Core Strategy (published in May 2009). At that time, the broad conclusion reached was that it is the precise location of this development which is the most important factor in determining impact on European sites and that Core Strategy policy provided necessary mitigation to avoid harm to these sites, though further analysis would be required at the site allocations stage to ensure appropriate sites are allocated.
- 9.9 Similarly at this stage, despite the increased scale of housing development proposed in the main modifications to the Core Strategy, the application of the policy measures within the Core Strategy (set out above), is likely to create no adverse effects on the site integrity of the European sites.
- 9.10 Precise locations for small urban extensions in the towns and sites for development in rural areas will be determined in the Site Allocations Development Plan Document and will be appropriately assessed at that time.