

Central Telford Area Action Plan Sustainability Appraisal Report Appendices February 2010

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1 Appendix A - Publication SA Results June 2009

1 Appendix A - Publication SA Results June 2009

Spatial Vision and Objectives

Plan Objectives	Sustainability Objectives											
	1	2	3	4	5	6	7	8	9	10	11	12
	To reduce poverty and social exclusion	To reduce and prevent anti social activity, crime and fear of crime	To promote accessibility to a range of services and facilities to meet people's basic needs	To provide a range of housing that meets the needs of the Council area accompanied by adequate supporting infrastructure	To improve the population's health and reduce inequalities in health	To improve the education and skills of the population	To make the best use of previously developed land and buildings	To reduce the need to travel and promote modes of travel other than the car	To protect and enhance the quality of the landscape and the countryside	To protect and enhance wildlife habitats which are important on an international, national and local scale (and protect and enhance areas with biodiversity value)	To protect and enhance geographical and geomorphological diversity	To protect and where appropriate enhance the landscape, buildings, sites and features of archaeological, historical or architectural interest and their settings
Spatial Vision and Objectives	++	++	+	++	++	+	0	++	++	++	0	++

Plan Objectives	Sustainability Objectives											
	13	14	15	16	17	18	19	20	21	22	23	
	To address the causes of climate change through reducing greenhouse gas emissions	To reduce the risk of flooding	To protect and enhance the availability and quality of water resources	To reduce air pollution and ensure that air quality continues to improve	To reduce noise and light pollution	To reduce contamination and safeguard soil quality and quantity	To increase energy efficiency and increase the use of renewable energy	To reduce the generation of waste and maximise re-use and recycling	To promote the use of resources efficiently, as well as sustainably sourced products and re-used and recycled products	Create a balance of employment opportunities across all sectors	To improve economic competitiveness in the area	
Spatial Vision and Objectives	++	++	0	+	-	0	++	+	+	+	++	

Criteria for assessing the significance of effects	Strongly Positive ++	Slightly Positive +	Neutral/Not related 0	Slightly Negative -	Strongly Negative --	Insufficient Information ?

1 Appendix A - Publication SA Results June 2009

Character Areas and Sites

Plan Objectives	Sustainability Objectives											
	1	2	3	4	5	6	7	8	9	10	11	12
	To reduce poverty and social exclusion	To reduce and prevent anti social activity, crime and fear of crime	To promote accessibility to a range of services and facilities to meet people's basic needs	To provide a range of housing that meets the needs of the Council area accompanied by adequate supporting infrastructure	To improve the population's health and reduce inequalities in health	To improve the education and skills of the population	To make the best use of previously developed land and buildings	To reduce the need to travel and promote modes of travel other than the car	To protect and enhance the quality of the landscape and the countryside	To protect and enhance wildlife habitats which are important on an international, national and local scale (and protect and enhance areas with biodiversity value)	Protect and enhance geological and geomorphological diversity	To protect and where appropriate enhance the landscape, buildings, sites and features of archaeological, historical or architectural interest and their settings
Town Centre Character Area	+	+	+	0/+	0/+	0	+	0/+	0/+	0/+	0	+
TC1 Town Centre Core	+ /+++	+	+ /+++	?	+	?	++	+	0	0	0	+
TC2 East Southwater	+	+	++	?	+	0	+	++	++	0	?	?
TC3 Conference Quarter	+	+	++	?	+	0	+	++	++	0	?	?
TC4 Malinslee Link	+	0	0	0	0	0	+ /-	+	?	?	0	0
TC5 Telford Urban Park	+	+	?	?	+	?	0	?	+	0	?	0
TC6 Civic Quarter	0/+	?	+	?	0/+	?	0	+	0	?	?	0
TC7 Telford Gateway	+	0	0/+	0	0	0/(+)	0/+	0/+	0	0	0	0
Old Park Character Area	+	+	++	?	+	0	+	?	?	?	?	?

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Plan Objectives	Sustainability Objectives											
	1	2	3	4	5	6	7	8	9	10	11	12
	To reduce poverty and social exclusion	To reduce and prevent anti social activity, crime and fear of crime	To promote accessibility to a range of services and facilities to meet people's basic needs	To provide a range of housing that meets the needs of the Council area accompanied by adequate supporting infrastructure	To improve the population's health and reduce inequalities in health	To improve the education and skills of the population	To make the best use of previously developed land and buildings	To reduce the need to travel and promote modes of travel other than the car	To protect and enhance the quality of the landscape and the countryside	To protect and enhance wildlife habitats which are important on an international, national and local scale (and protect and enhance areas with biodiversity value)	To protect and enhance geological and geomorphological diversity	To protect and where appropriate enhance the landscape, buildings, sites and features of archaeological, historical or architectural interest and their settings
OP1 Old Park West	+	+	+	?	+	0	-	+	+	-	?	0
OP2a Park Lane	-	0	--	0	-/+	0	+	-	+/-	0	0	+
OP2b The Crest	-	-	0	?	+	0	+	-	0	0	?	0
OP3 Central Old Park	+	0	-	0	0	+	+	-	0	0	0	+
OP5 Old Park East	0	0	0/+	0	0	0	0/+	0/(+)	0/(+)	0	0	0
Central Park Character Area	+	0/+	0/+	0/+	+	0	+/0	+	+	0/+	0	0/+
CP1 Central Park	+	+	++	0	-	0	++	+	0	0	?	0
CP2 Telford Way	+	0	0	0	0	+	+	+	0	0	0	+
CP5 Land North of Priorslee Roundabout	0	0	+	0	0	0	-	-	+	0	0	0
CP6 Holyhead Road	0	0	0	0	0	0	-	0	?	?	0	-

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Plan Objectives	Sustainability Objectives										
	13	14	15	16	17	18	19	20	21	22	23
	To address the causes of climate change through reducing greenhouse gas emissions	To reduce the risk of flooding	To protect and enhance the availability and quality of water resources	To reduce air pollution and ensure that air quality continues to improve	To reduce noise and light pollution	To reduce contamination and safeguard soil quality and quantity	To increase energy efficiency and increase the use of renewable energy	To reduce the generation of waste and maximise re-use and recycling	To promote the use of resources efficiently, as well as sustainably sourced products and re-used and recycled products	Create a balance of employment opportunities across all sectors	To improve economic competitiveness in the area
Town Centre Character Area	0	0	0	0	0/-	0	0	0/-	0	++	++
TC1 Town Centre Core	-	0	0	-	-	?	0 (+/-)	-	0/-	+	++
TC2 East Southwater	?	0	0	0	0	+	-	-	?	++	+
TC3 Conference Quarter	?	0	0	0	0	+	-	-	?	++	+
TC4 Malinslee Link	+	-	?	-	-	?	0	?/-	0	0	+
TC5 Telford Urban Park	0	0	?	0	?	?	?	?	?	0/+	+
TC6 Civic Quarter	0/+	0	?	0/+	0	?	?	?	?	+	0
TC7 Telford Gateway	0/+	0	0	0/+	0	0	0	0	0	0/+	0/+
Old Park Character Area	-	-	?	-	-	?	-	-	?	+	++
OP1 Old Park West	--	-	0	--	-	?	-	-	0	0	0/+
OP2a Park Lane	0	-	-	0	0	?	0	0	0	0	0
OP2b The Crest	-	?	?	-	-	?	-	-	?	+	+
OP3 Central Old Park	0	0	0	?	0	0	0	0	0	+	+
OP5 Old Park East	0/(+)	0	0	0/(+)	0	0	0	0	0	0	0/+
Central Park Character Area	-	0	0	0	0/+	0	-	-	0	++	++
CP1 Central Park	-	-	+	-	-	?	-	-	?	++	+

1 Appendix A - Publication SA Results June 2009

Plan Objectives	Sustainability Objectives										Criteria for assessing the significance of effects
	13	14	15	16	17	18	19	20	21	22	
	To address the causes of climate change through reducing greenhouse gas emissions	To reduce the risk of flooding	To protect and enhance the availability and quality of water resources	To reduce air pollution and ensure that air quality continues to improve	To reduce noise and light pollution	To reduce contamination and safeguard soil quality and quantity	To increase energy efficiency and increase the use of renewable energy	To reduce the generation of waste and maximise re-use and recycling	To promote the use of resources efficiently, as well as sustainably sourced products and re-used and recycled products	Create a balance of employment opportunities across all sectors	To improve economic competitiveness in the area
CP2 Telford Way	+	0	-	0	0	?	0	0	0	+	+
CP5 Land North of Priorslee Roundabout	0	-	-	-	-	0	+	0	0	0	0
CP6 Holyhead Road	0	0	0	0	0	?	0	0	0	0	0
Mainslee Character Area	0	0	0	0	0	0	0	0	0	0	0
MA1 Park Road	+	?	-	-	-	0	+	0	0	+	+
MA3 Land at Langley & St Leonards Schools, Spout Lane	-	?	?	-	-	?	-	-	?	+	+
MA4 Land at Church Road	-	0	?	-	0	?	-	-	?	0	0
Hollinswood Character Area	0	0	0	0	0	0	0	0	0	0	0
Criteria for assessing the significance of effects		Strongly Positive ++	Slightly Positive +	Neutral/Not related 0	Slightly Negative -	Strongly Negative --	Insufficient Information ?				

1 Appendix A - Publication SA Results June 2009

Plan Objectives	Sustainability Objectives											
	1	2	3	4	5	6	7	8	9	10	11	12
	To reduce poverty and social exclusion	To reduce and prevent anti social activity, crime and fear of crime	To promote accessibility to a range of services and facilities to meet people's basic needs	To provide a range of housing that meets the needs of the Council area accompanied by adequate supporting infrastructure	To improve the population's health and reduce inequalities in health	To improve the education and skills of the population	To make the best use of previously developed land and buildings	To reduce the need to travel and promote modes of travel other than the car	To protect and enhance the quality of the landscape and the countryside	To protect and enhance wildlife habitats which are important on an international, national and local scale (and protect and enhance areas with biodiversity value)	To protect and enhance geological and geomorphological diversity	To protect and where appropriate enhance the landscape, buildings, sites and features of archaeological, historical or architectural interest and their settings
CT6 Leisure, Culture and Tourism	+/++	+/-	+/++	0	+/-	0	0	+/-	0	0	0	0/-
CT7 Box Road	+	0	+	0	+	0	+	++	0	0	0	0
CT8 Parking	+	0	0	0	0	0	+	-	0	0	0	0
CT9 Park and Rail/Walk facility Telford Central Railway	0	0	+	0	0	0	+	+		0	0	0
CT10 Greyhound Link	0	0	+	0	0	0	0	0	0	0	0	0
CT11 Bus Station	+	0	0	0	+	0	+	+	0	0	0	0
CT12 Design	+	+	+	?	?	?	+	?	?	?	?	+
CT13 Density	+	?	++	?	?	?	++	++	?	?	?	?
CT14 Public Realm	+	+	+	?	+	?	?	+	?	?	?	+
CT15 Storey Heights and Tall Buildings	+	0	0	0	0	0	+	0	0	0	0	0

1 Appendix A - Publication SA Results June 2009

Plan Objectives	Sustainability Objectives											
	13	14	15	16	17	18	19	20	21	22	23	
	To address the causes of climate change through reducing greenhouse gas emissions	To reduce the risk of flooding	To protect and enhance the availability and quality of water resources	To reduce air pollution and ensure that air quality continues to improve	To reduce noise and light pollution	To reduce contamination and safeguard soil quality and quantity	To increase energy efficiency and increase the use of renewable energy	To reduce the generation of waste and maximise re-use and recycling	To promote the use of resources efficiently, as well as sustainably sourced products and re-used and recycled products	Create a balance of employment opportunities across all sectors	To improve economic competitiveness in the area	
CT1 Mixed Use	?	?	?	?	?	?	?	?	?	+	++	
CT2 Retail	0	0	0	0	0	0	0	-	0	+	+	
CT3 Employment	-	?	?	-	0	?	-	-	?	+	+	
CT4 Residential	-	?	?	-	-	?	-	-	?	+	++	
CT5(A) Affordable housing tenures and their spatial distribution	?	?	?	?	?	?	?	?	?	?	?	
CT5(B) Percentage of affordable housing	?	?	?	?	?	?	?	?	?	?	?	
CT5(C) On site and off site provision of affordable housing	?	?	?	?	?	?	?	?	?	?	?	
CT6 Leisure, Culture and Tourism	-/-	-/-	0	-/-	0/-	0	-/-	-/-	-/-	+///	+///	
CT7 Box Road	+	0	0+	0	0	0	0	0	0	0	+	
CT8 Parking	0	0	0	0	0	0	0	0	0	+	+	
CT9 Park and Rail/Walk facility Telford Central Railway	0	0	0	+	0	0	0	0	0	0	0	
CT10 Greyhound Link	-	0	0	0	?	0	0	0	0	0	0	
CT11 Bus Station	0	0	0	0	0	0	0	0	0	+	+	
CT12 Design	++	?	+	+	+	+	+	?	++	?	++	

1 Appendix A - Publication SA Results June 2009

Plan Objectives	Sustainability Objectives											
	13	14	15	16	17	18	19	20	21	22	23	
To address the causes of climate change through reducing greenhouse gas emissions	++	?	?	+	?	?	+	?	?	?	?	?
To reduce the risk of flooding	?	?	?	?	?	?	?	?	?	?	?	?
To protect and enhance the availability and quality of water resources	?	?	?	+	?	?	+	?	?	?	?	?
To reduce air pollution and ensure that air quality continues to improve	+	?	?	+	?	?	+	?	?	?	?	?
To reduce noise and light pollution	?	?	?	?	?	?	?	?	?	?	?	?
To reduce contamination and safeguard soil quality and quantity	?	?	?	?	?	?	?	?	?	?	?	?
To increase energy efficiency and increase the use of renewable energy	+	?	?	+	?	?	+	?	?	?	?	?
To reduce the generation of waste and maximise re-use and recycling	?	?	?	?	?	?	?	?	?	?	?	?
To promote the use of resources efficiently, as well as sustainably sourced products and re-used and recycled products	?	?	?	?	?	?	?	?	?	?	?	?
Create a balance of employment opportunities across all sectors	?	?	?	?	?	?	?	?	?	?	?	?
To improve economic competitiveness in the area	?	?	?	?	?	?	?	?	?	?	?	?
CT13 Density	++	?	?	+	?	?	+	?	?	?	?	?
CT14 Public Realm	+	?	?	?	?	?	?	?	?	?	?	+
CT15 Storey Heights and Tall Buildings	-	0	0	0	0	0	-	0	0	0	0	++
CT16 Biodiversity	++	+ / ++	0 / +	++	0	?	0	0	0	?	?	?
CT17 Landscape	+	+ / ++	+	+	+	0	+	0	0	0 / +	0 / +	0 / +
CT18 Telford Town Park	+	+	+	+	0	0	0	0	0	0 / +	0 / +	0 / +
CT19 Protection of Green Space	++	++	0 / +	++	0	?	0	0	0	?	?	?
CT20 Provision of New Green Space	++	++	0 / +	+	0	?	0	0	0	?	?	?
CT21 Developer Contributions for delivering infrastructure	+ / -	+	- / - -	+ / -	0	0 / -	+	+	+	+	+	+
Criteria for assessing the significance of effects		Strongly Positive ++	Slightly Positive +	Slightly Positive +	Neutral/Not related 0	Slightly Negative -	Strongly Negative --	Insufficient Information ?				

2 Appendix B - Blank SA Matrix

2 Appendix B - Blank SA Matrix

Obj	Sustainability Objectives	Policy/Site being appraised:	
		Score:	Mitigation Measures:
No			
1	To reduce poverty and social exclusion		
2	To reduce and prevent anti social activity, crime and fear of crime		
3	To promote accessibility to a range of services and facilities to meet people's basic needs		
4	To provide a range of housing that meets the needs of the Council area accompanied by adequate supporting infrastructure.		
5	To improve the population's health and reduce inequalities in health		
6	To improve the education and skills of the population		
7	To make the best use of previously developed land and buildings		
8	To reduce the need to travel and promote modes of travel other than the car		
9	To protect and enhance the quality of the landscape and the countryside		
10	To protect and enhance wildlife habitats which are important on an international, national and local scale (and protect and enhance areas with biodiversity value)		
11	Protect and enhance geological and geomorphological diversity		
12	To protect and where appropriate enhance the landscape, buildings, sites and features of archaeological, historical or architectural interest and their settings		
13	To address the causes of climate change through reducing greenhouse gas emissions		
14	To reduce the risk of flooding		
15	To protect and enhance the availability and quality of water resources		
16	To reduce air pollution and ensure that air quality continues to improve		
17	To reduce noise and light pollution		
18	To reduce contamination and safeguard soil quality and quantity		
19	To increase energy efficiency and increase the use of renewable energy		
20	To reduce the generation of waste and maximise re-use and recycling		

2 Appendix B - Blank SA Matrix

Obj	Sustainability Objectives	Policy/Site being appraised:
No		
21	To promote the use of resources efficiently, as well as sustainably sourced products and resources and re-used and recycled products	
22	Create a balance of employment opportunities across all sectors	
23	To improve economic competitiveness in the area	

Criteria for assessing the significance of effects	Strongly Positive ++	Slightly Positive +	Neutral/Not related 0	Slightly Negative -	Strongly Negative --	Insufficient information ?

3 Appendix C - Compatibility of Sustainability Objectives and Central Telford Objectives

3 Appendix C - Compatibility of Sustainability Objectives and Central Telford Objectives

Spatial Vision and Objectives

- The Vision for Central Telford

	Sustainability Objectives	Vision						
		A Centre with a Vibrant Heart	Distinctive Sense of Place	A Place for Living	A Centre with a Thriving Economy	An Accessible and Connected Centre	A Low Carbon Town	A Green Community
1	To reduce poverty and social exclusion	++	++/0	++	0/+	+	0/+	++/0
2	To reduce and prevent anti social activity, crime and fear of crime	0/+	0/+	+	0	0	0	0/+
3	To promote accessibility to a range of services and facilities to meet people's basic needs	++	0	++	0/+	++	0	0/+
4	To provide a range of housing that meets the needs of the Council area accompanied by adequate supporting infrastructure	0	0	++	0	0	0	0
5	To improve the population's health and reduce inequalities in health	+/0	0	+	0	0	0/+	+
6	To improve the education and skills of the population	0	0	+	0	0	0	0
7	To make the best use of previously developed land and buildings	++	+	0	0	0/+	0	0
8	To reduce the need to travel and promote modes of travel other than the car	+	++	+	0	++	+	+
9	To protect and enhance the quality of the landscape and the countryside	0	0	0	0	0	0	+
10	To protect and enhance wildlife habitats which are important on an international, national and local scale (and protect and enhance areas with biodiversity value)	0	0	0	0	0	0	+
11	Protect and enhance geological and geomorphological diversity	0	0	0	0	0	0	0
12	To protect and where appropriate enhance the landscape, buildings, sites and features of archaeological, historical or architectural interest and their settings	0	+	0	0	0	0	+
13	To address the causes of climate change through reducing greenhouse gas emissions	+/0	+	+	0/+	0/+	++	+
14	To reduce the risk of flooding	+/0	++	+	0	0	++	+
15	To protect and enhance the availability and quality of water resources	0	0	0	0	0	+	0

3 Appendix C - Compatibility of Sustainability Objectives and Central Telford Objectives

	Sustainability Objectives	Vision							
		A Centre with a Vibrant Heart	Distinctive Sense of Place	A Place for Living	A Centre with a Thriving Economy	An Accessible and Connected Centre	A Low Carbon Town	A Green Community	
16	To reduce air pollution and ensure that air quality continues to improve	+	+	0	0	+	++	+	
17	To reduce noise and light pollution	0	0	0	0	0	+	0	
18	To reduce contamination and safeguard soil quality and quantity	0	0	0	0	0	0	0	
19	To increase energy efficiency and increase the use of renewable energy	0	+	+	0/+	0	++	0	
20	To reduce the generation of waste and maximise re-use and recycling	0	0	0	0	0	+	0	
21	To promote the use of resources efficiently, as well as sustainably sourced products and resources and re-used and recycled products	0	+	0	0	0	+	0	
22	Create a balance of employment opportunities across all sectors	++	+	+	++	0	0	++	
23	To improve economic competitiveness in the area	++	+	++	+	+	0	+	

4 Appendix D - SA Scoping Report 2008 Representations

4 Appendix D - SA Scoping Report 2008 Representations

Advantage West Midlands, Mark Pearce

4.1 The inclusion of the WMES in your list of relevant plans in Table 2.1 is welcomed; however it should now make reference to the new WMES 'Connecting to Success' which was launched on 10th December along with a draft Delivery Framework setting out how the Economic Strategy will be delivered. The identification of sustainability objectives derived from a review of relevant documents, presented in Table 2.2 and in Appendix A, is also to be welcomed but should be updated to align with the new WMES. Further information on the new WMES is available on www.advantagewm.co.uk/wmesreview/wmesreview.html

4.2 The Agency in conjunction with the West Midlands Regional Assembly has produced a 'Sustainability Checklist', which can be found on www.checklistwestmidlands.co.uk.

4.3 The Checklist identifies a range of different economic, social and environmental sustainability issues covered in National Guidance and the West Midlands Regional Spatial Strategy. The Checklist also covers regionally specific sustainability and planning issues, emphasising those of higher priority and can also be adapted to reflect locally significant concerns.

English Heritage, Amanda Smith

4.4 Overall the Scoping Report provides a clear and thorough explanation of the appraisal process, the work carried out to date, and planned future work. The linkages between the main body of the text and appendices are clear, and the relationship between each stage in the appraisal process is explained well. Our comments primarily relate to the treatment of the historic environment and our comments on each stage primarily seek to strengthen the consideration of this core topic.

4.5 The Scoping Report is titled in a general way to apply to the Local Development Framework. English Heritage recommends that Scoping Reports are tailored to the type, purpose, and level of plan under consideration. The tiering of Scoping Reports, through the use of an overarching report and subsequently fine tuned for particular documents, can help to reduce repetition and give a better focus to the appraisal framework. Obviously in the case of Telford and Wrekin the Core Strategy is adopted, so the appraisal framework will be principally applied to the series of Development Plan and Supplementary Planning Documents.

4.6 Applicable to all stages of the appraisal process the historic environment must be broadly defined - all designated historic assets should be considered together with potential impacts on non-designated features of local historic or architectural interest and value since these can make an important contribution to creating a sense of place, local identity and distinctiveness in both rural and urban areas. Statutory designations include Listed Buildings, Scheduled Monuments plus other nationally important archaeological sites, Registered Historic Parks and Gardens, Registered Battlefields, Conservation Areas, and the settings of all these assets. Other important elements of the historic environment, which are often without any statutory protection, include other archaeological remains, locally listed buildings, parks and gardens, landscape and townscape features, the historic character of wider the landscape / townscape, as well as the potential for as yet unrecorded archaeology.

4.7 English Heritage strongly advises that the conservation and archaeological staff of the Council and Shropshire County Council are closely involved throughout the preparation of local development documents and their associated appraisal process. They are best placed to advise on: local historic environment issues and priorities, including access to data held in the Historic

4 Appendix D - SA Scoping Report 2008 Representations

Environment Record (formerly Sites and Monuments Record); how policies and proposals can be tailored to minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of historic assets.

Other Relevant Plans and Programmes – consultation question 1

4.8 We have several suggested additions to Table 2.1 and Appendix A, which are detailed below.

4.9 *International* – add:

- *European Landscape Convention*, which the UK Government has signed and ratified. The European Landscape Convention aims to encourage public authorities to adopt policies and measures at local, regional, national and international level for protecting, managing and planning landscapes throughout Europe. Landscape is defined as ‘an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors’. The Convention applies this definition to all parts of a country’s territory, urban as well as rural areas, to both outstanding and ordinary landscapes, to degraded as well as well-preserved places. It hence adopts a holistic approach to the landscape rather than focusing on special areas. The Convention’s definition of landscape and its emphasis on action/interaction, human factors and cultural perspectives is well reflected in English Heritage’s national programme of Historic Landscape Characterisation.
<http://www.defra.gov.uk/WILDLIFE-COUNTRYSIDE/issues/landscap/index.htm>
<http://conventions.coe.int/Treaty/en/Treaties/Html/176.htm>
- *UNESCO World Heritage Convention* – a fundamental inclusion given the Ironbridge World Heritage Site (and appropriate link to references to the management under the local section).

4.10 *National* – add:

- The Government’s statement on the historic environment ‘*The Historic Environment: A Force for our Future*’ published by DCMS in 2001.
- Heritage Protection White Paper (March 2007). A summary of its main provisions is given at: <http://www.helm.org.uk/server/show/nav.11237>

4.11 In Appendix A, the analysis of PPG15 and PPG16 and their implications for the LDF and SA is of concern in that they refer to ‘consider’ inclusion in the SA framework and LDF rather than the stronger concluding requirement under other comparable topics should as biodiversity. The historic environment is a prescribed topic under the SEA Regulations, and must be included as part of the framework. Similarly, the historic environment should feature in plan policies. As underlined above the historic environment should be broadly defined and recognised as an urban and rural resource.

4.12 In addition to the plans/programmes/policies highlighted above that directly relate to the historic environment we also wish to highlight the following links to the historic environment in other relevant PPS/PPGs. This is relevant in terms of the derivation of sustainability objectives:

- PPS 1: Delivering Sustainable Development - reference to protecting and enhancing the historic environment and the quality and character of the countryside, [Paragraph 5; ensuring high quality design [Paragraph 5]; a high level of protection to the most valued townscapes and landscapes [Paragraph 17]; enhance as well as protect the historic environment and

4 Appendix D - SA Scoping Report 2008 Representations

landscape and townscape character [Paragraph 27(ix)]; promotion of design which is appropriate for its context [Paragraph 34-5]; reinforcement of local distinctiveness [Paragraph 38]

- PPS 3 Housing: the importance of respecting local character (paras. 48-49).
- PPS 7: Sustainable Development in Rural Areas - paragraphs 12, 15, 16, 17 and 34 are of particular relevance to the historic environment. PPS7 recognises that many country towns and villages are of considerable historic and architectural value. The document seeks a commitment to good design that makes an important contribution to local identity and regional diversity. It supports the re-use of existing buildings in the countryside where this would meet sustainable development objectives and the need to preserve buildings of historic or architectural importance. It identifies that the historic environment has a role in the economics of the region through tourism and leisure.
- PPS 22: Renewable Energy [Paragraph. 9 (World Heritage Sites); Paragraph 11 (other nationally-designated areas)]

4.13 *Regional* – Add:

- West Midlands Green Infrastructure Prospectus.
- Note that the Regional Cultural Strategy is due to be reviewed and updated.
- The West Midlands Regional Historic Environment Forum is also in the process of developing a Regional Historic Environment Strategy. This is still at a very early stage and unlikely to be completed until the end of 2008.

4.14 *Local*:

- Other community based planning initiatives such as Parish Plans, Town and Village design statements could also be highlighted.
- For subsidiary Scoping Reports it may be relevant to include relevant Conservation Area Appraisals and Management Plans.

4.15 Table 2.2 is a useful summary device. We object, however, to the grouping of the historic environment with other topics such as the countryside and open space, in contrast to dedicated consideration applied to biodiversity. Although links can be made between these topics, specific consideration should be given to the historic environment (as per our broad definition). In our experience without this there is a risk that the later stages of the appraisal process will underplay the historic environment and fail to provide a robust assessment.

Baseline Information – consultation question 2

4.16 We support the clear commitment to keep under review the data sources during subsequent stages of the appraisal (paragraph 3.8), and trust that this will be followed throughout the appraisal process for current and future Local Development Documents.

4.17 The data tables given in Appendix B are organised in a useful and informative way. The inclusion of a summary narrative in the main report is often useful rather than simply relying on appendices of tabulated numeric data.

4.18 We have a number of concerns regarding the adequacy of the scope and content of the data included for the historic environment. As underlined in our general comments, in establishing the baseline the historic environment should be broadly interpreted encompassing:

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- all designated historic assets;
- non designated features of local historic interest;
- the character of the wider landscape and townscape; and
- the potential for as yet unrecorded archaeological interest.

4.19 We offer the following recommendations on the scope of the data that should be taken into account and collated to help ensure a robust consideration of the Council's historic environment resource.

- The data in Appendix B (pL) focuses primarily on a limited range of designated historic assets. This fails to adequately reflect the historic environment resource of Telford & Wrekin and adjoining areas. For up-to-date information on designated historic assets – the 2007 Heritage Counts Report (www.heritagecounts.org.uk) includes a web-based summary of core data sets by local authority area for the West Midlands. [*Note also that consideration must be given to Scheduled Monuments and other nationally important archaeological remains - since not all are scheduled.]
- For all designated assets, setting issues are also relevant to the baseline.
- The designated site data in Heritage Counts must be supplemented by further information on the Borough's non-designated historic resource. This is a major omission in the data presented in the draft Scoping Report. We strongly recommend that this is addressed and relevant data given on, for example, local list buildings and other features, parks and gardens, and non designated archaeological remains (available via the County Council's Historic Environment Record).
- The condition of the historic resource is also an important consideration – and a data set which can be used to help inform comparators and trends. The 2007 national Buildings at Risk Register was published in the summer with updated figures for Grade I and II* listed buildings (and structural Scheduled Monuments). Grade II listed buildings are not currently monitored under the national register. However, Grade II buildings form the vast majority of the listed resource, and an up-to-date at risk register for them may be an information gap and should hence be highlighted as part of the baseline. Any available at risk data for unlisted buildings of local historic / architectural interest should also be used. Comparisons to previous years BAR Registers (national or local) should be undertaken to inform the trend review.
- English Heritage has completed a Scheduled Monuments at Risk survey for the region, the results of which have been made available to the County Council's Historic Environment Record. Preliminary results of the survey are available via the Heritage Counts website, but more detailed results for Shropshire and Telford and Wrekin are available and should be highlighted in the baseline.
- Towards the end of 2008 English Heritage will launch its Heritage at Risk programme which will cover all designated historic assets. Information derived from this ongoing work should be taken into account when updating baseline and monitoring frameworks.
- The potential for as yet unrecorded archaeological interest should also be highlighted.
- For conservation areas, additional information on their extent (e.g. area/% of Council area covered) as well as information on the numbers with up to date conservation area appraisals and published management plans – as per the former BVPI indicator. The section on issues and opportunities could also be expanded on for example, are any subject to development pressures whether larger-scale to small-scale cumulative changes to their character and appearance? Discussions with the Council's conservation officers should inform this further.

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- Similarly, the analysis for the World Heritage Site could be usefully expanded on drawing on the management plan and discussions with the WHS Coordinator.
- The baseline data given is predominantly site specific and consideration should also be given to the historic character of landscapes and townscapes – beyond the conservation areas already mentioned. It is not easy to represent the historic environment spatially in a holistic way. Point data alone from individual designations do not provide an adequate overview. Historic landscape characterisation and urban characterisation can supplement this, broadening the understanding of the historic environment by describing the evolution of the present day landscape / townscape and identifying its surviving historic character. Through this process, an understanding about what gives a place its distinctive character and sense of place can be gained.
The table refers to landscape character areas (pLII) – is this based on Shropshire County Council's integrated landscape character assessment, which uses the county wide historic landscape characterisation (HLC) and landscape character assessment (LCA)? The links between landscape character and historic environment must be recognised.
With respect to trends *Countryside Quality Counts* provides some measure of the degree of safeguarding or erosion of historic landscape features.
- For the Council's urban areas and smaller settlements, conservation area appraisals will describe the historic character of these defined areas. Consideration, however, should also be given to the need for further urban characterisation data for townscape areas outside of conservation areas but under potential development pressure (e.g. suburban areas) or likely to be subject to major change. There are a range of approaches to urban characterisation studies (as for example extensive and intensive surveys of historical significance developed in the context of areas of low demand housing (a) and rapid assessments for suburban areas (b)).
- Further to the above comment we wish to draw your attention to a piece of work Shropshire County Council is undertaking, part funded by English Heritage, in using the county HLC to determine the sensitivity and capacity of the urban-rural fringe area surrounding Shrewsbury (another growth point local authority) to accommodate new development and identify green infrastructure opportunities. It is envisaged that this project will provide an approach that can be replicated elsewhere to help inform decisions as to the location, scale and planning of development. The project report is due to be completed early year and will be disseminated to all the County leads on HLC.
- Other relevant baseline data sources include - Parkland loss. As part of the national Heritage Counts report in 2005, data is presented on the loss of historic parkland over the period 1918-1995 – the results of which are now available by local authority area in the national and regional summaries for the 2006 edition of heritage counts (on the website).
- Traditional farm buildings are typically under represented in statutory listings, but represent a fundamental part of an area's rural heritage and equally subject to a range of development pressures. General baseline data on traditional farm buildings is also available in the 2005 national Heritage Count report relating to their condition and levels of conversion (reported by joint character area). Available via the HELM website <http://www.helm.org.uk/server/show/nav.9495> a more detailed summary is given for each region by joint character area of their characteristic traditional farm building stock in a series of preliminary regional character statements. Shropshire County Council, with support from English Heritage, is undertaking a county wide survey of traditional farm buildings which will be completed early in the New Year (contact: Andy Wigley, Shropshire County Council).
- Consideration should also be given to using more qualitative data, as for example resident satisfaction surveys. With respect to the historic environment one of the key indicators of

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the national Heritage Counts Report is participation in the historic environment, as for example visits to historic sites.

4.20 We welcome the inclusion of the theme on sense of community / identity (p XLIII) – this again has links to the historic environment in terms of its contribution to the distinctive character and local identity of places and cultural associations.

Key Sustainability Issues – consultation question 3

4.21 Table 4.1 is a useful summary. With regard to the consideration of the historic environment at page 28, we underline the importance of using a broad definition of the historic environment and not just limiting it to designated sites and buildings. The historic character of the landscape must also be recognised.

4.22 We offer the following advice to help generate a more thorough consideration of issues (and opportunities) relating to the historic environment. Analysis of the baseline information for the historic environment and early consultation with local authority conservation officers and archaeologists who understand local issues and opportunities, and with other key stakeholders and local communities will help identify sustainability issues relating to the historic environment. This underlines the importance of a comprehensive baseline for the historic environment together with LDF community consultation as an effective means of identifying environmental issues and opportunities.

4.23 Key issues should address opportunities as well as problems in relation to the historic environment. There is a need to understand the wider contribution of the historic environment to sustainable development and not simply view it as a narrow issue focused on preservation. An option that might be considered may be opportunities offered by heritage-led regeneration, heritage based sustainable tourism, place-making, design of new development to fit with the existing, functional layout of a town, village etc.

4.24 Environmental problems, issues and opportunities affecting the historic environment, and to be addressed in the SEA/SA process may include:

4.25 Problems

- Historic assets under threat or at risk from neglect or decay
- Areas of significantly degraded landscape / townscape
- Areas where, on current trends, there is likely to be further significant loss or erosion of landscape/ townscape character or quality
- Areas where development has had or is likely to have significant impact (direct and or indirect) upon the historic environment and/or people's enjoyment of it
- Areas where landscape character or quality is being eroded because of changing farming or other land management practices
- Traffic congestion, air quality, noise pollution and other problems affecting the historic environment
- Areas where quality of life, including economic and social well being, is significantly affected by the above environmental problems.

4.26 Issues

- Environmental capacity issues

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- Preserving and enhancing the designated and non-designated historic environment resource
- Conserving the industrial/commercial heritage of the area

4.27 Opportunities

- Using the area's historic environment resource (archaeology, built and industrial heritage) to contribute to local distinctiveness and sense of place and community engagement
- Promoting the innovative reuse of the existing building stock
- Improving awareness, involvement, and understanding of, and access to, the area's historic environment
- Heritage-led regeneration opportunities, heritage based tourism, traditional building skills and the wider environmental economy,
- Using the historic environment as an educational resource

Sustainability Appraisal Framework- consultation questions 4, 5, 6, 7

4.28 Our comments above on the identification of 'key issues' and the baseline should also be taken into account given that the objectives and questions have been derived in part from this stage.

4.29 With regard to the proposed sustainability objectives and draft framework (Table 5.1) we have the following comments:

- **Objective 09 – (maintain and enhance the quality of landscape and countryside)**

4.30 We support the general thrust of this headline objective on the landscape – subject to the recognition that this also encompasses the historic character of the landscape.

4.31 The proposed indicator is essentially a state of the environment type indicator, and an improved approach for monitoring impacts is recommended. For monitoring the wider character of the landscape, Natural England's Countryside Quality Counts initiative offers a potential indicator for change in a defined suite of landscape components. Applying the County Council integrated landscape character assessment also offers a more tailored approach. For example, approaches developed elsewhere have developed the following indicators:

4.32 - Area of highly sensitive historic landscape characterisation types which have been altered and their character eroded

4.33 - % of Joint Character Areas showing no change or showing change consistent with character area descriptions

- **Objective 11 – (protect and ... enhance landscape, buildings, sites and features of archaeological, historical or architectural interest and their settings)**

4.34 The overall thrust of the headline objective is supported and we welcome the specific consideration given to the historic environment.

4.35 As currently set out the framework does not include more detailed decision-making criteria which can help to further clarify and expand on the headline objective. Table 5.2 is useful in explaining the assessment rationale, but could also provide the basis for developing relevant criteria and their integration in the framework.

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4.36 To aid the derivation of more appropriate decision-making criteria we offer the following menu of questions to support environmental, social and economic objectives. We suggest these are reviewed and tailored to expand on the headline objective and reflect the historic environment resource of the area.

4.37 Environmental Objectives

- Will it preserve and/or enhance the historic environment
 - will it protect World Heritage Sites and their setting
 - will it preserve archaeological remains and their setting
 - will it preserve listed buildings and structures and their setting
 - will it preserve or enhance the character or appearance of conservation areas and their setting
 - will it protect Registered Parks and Gardens, Registered Battlefields and their setting
 - will it conserve locally important buildings and townscapes
 - will it conserve distinctive historic landscapes
 - will it contribute to the better management of heritage assets
- Will it improve the quality of the historic environment
- Will it lead to the improved management and or restoration of a historic asset
- Will it respect, maintain and strengthen local distinctiveness and sense of place
- Will it promote high quality urban design
- Will it provide for increased access to the historic environment

4.38 Social Objectives

- Will it increase the social benefit (e.g. education, participation, citizenship, health and well-being) derived from the historic environment
- Will it improve the satisfaction of people with their neighbourhoods as places to live
- Will it engage communities in identifying culturally important features and areas
- Will it provide for increased understanding of the historic environment

4.39 Economic Objectives

- Will it increase the economic benefit (e.g. heritage led regeneration, tourism, environmental economy, cultural economy) derived from the historic environment
- Will it promote the environmental economy
- Will it promote heritage-led regeneration
- Will it lead to the repair and restoration of an historic asset
- Will it make the best use of existing buildings and physical infrastructure
- Will it promote heritage based sustainable tourism
- Will it ensure that restoration and repair and maintenance is sympathetic towards the local environment
- Will it support the repair and reuse of historic buildings
- Will the initiative help to reduce the number of vacant buildings through adaptive re-use

4.40 The selection of indicators for the historic environment may vary at different stages of the appraisal process and in relation to the particular Local development document. State of the environment or contextual indicators can inform the baseline analysis, such as looking at the comparative range, quality and condition of historic assets and identifying possible targets.

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However, state of the environment indicators may not always be suitable for the appraisal or monitoring the significant effects of a plan. At these stages the priority should be devising indicators which will clearly demonstrate the impact(s) of the plan on the historic environment.

4.41 The proposed set of indicators for Objective 11 include both state of the environment type indicators (numbers / areas of assets) and an impact focused indicator. An indicator directed at monitoring positive impacts would be helpful to include. As part of our forthcoming guidance we have compiled a range of indicators which draw upon practice to date. A selection of these is outlined below. We suggest that the proposed set of indicators is reviewed in the context of these updated ideas which have emerged from developing practice:

- Number and % of Listed Buildings at Risk (all grades) [serving to clarify the scope of the proposed indicator on listed buildings]
- Number and % of locally listed buildings at risk [similarly expands the proposed buildings at risk indicator]
- Number and % of Scheduled Monuments at Risk
- Change in the character or appearance of conservation areas
- Number of historic buildings restored and brought back into use
- % of local authority area covered by historic landscape / urban characterisation studies
- Improvements in the management of historic and archaeological sites and features
- % of planning applications for which archaeological investigations were required prior to approval
- % of planning applications where archaeological mitigation strategies (preservation by design and/or archaeological recording) were developed and implemented
- Area of highly sensitive historic landscape characterisation types which have been altered and their character eroded

SA Baseline and Trends – consultation question 8

4.42 This is a useful section to include, but it is unclear which plan (paragraph 5.10) it applies to – is it the LDF in its entirety or particular local development document?

4.43 With regard to the historic environment and extent to which it is protected by external legislation, it should be noted that currently Registered Parks and Gardens, Registered Battlefields and indeed World Heritage Sites are only covered in terms of being a material consideration in the planning system.

Environment Agency, Hilary Berry

Question 1

4.44 Other Relevant documents for the Telford and Wrekin Area include the Severn CFMP (catchment flood management plan), The River Severn Fluvial Strategy. The current Severn CFMP is a pilot version and a latest version should be produced by the end of the year. Telford and Wrekin Council are involved in DEFRA's 'Making Space for Water' strategy as well as an 'Integrated Urban Drainage project'. Reference should be made to these and contact made with the personnel in the council involved with these. All these documents should be or have been considered as part of the Councils Strategic Flood Risk Assessment.

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4.45 A document which should be included in Appendix A is the West Midlands Regional Flood Risk Appraisal this was produced by the West Midlands Regional Assembly in October 2007. The document can be found at <http://www.wmra.gov.uk/page.asp?id=82>

4.46 Table 2.2 purports to represent the outcome of a general, first set of sustainability objectives (split into the three dimensions of sustainable development: social, environmental and economic). This draws on information from Table 2.1 – (Relevant Policies, Plans and Programmes) and from Appendix A – (Review of Relevant Plans, Policies and Programmes). The comment below only refers to the section entitled Environmental within Table 2.2 and the aspects related to groundwater and geology:-

4.47 We identify a shortcoming in Table 2.1 as, although it lists the EU Water Directive 2000, it does not list the recently finalised EU Groundwater Daughter Directive as a key document relevant to the LDF and SA. The outcome of this is seen in Table 2.2 where under the objective: "Maintain and improve water quality of Telford and Wrekin's rivers and water courses and achieve sustainable water resources management", groundwater is not listed alongside surface water in column 1 and under column 2 "Source" reference should be made to the Groundwater Daughter Directive.

4.48 Appendix A does list groundwater under the general EU Water Directive 2000 but again this information fails to carry through to Table 2.2.

4.49 Reference is made in Table 2.1 to PPS 9 (biodiversity and geological conservation). The issue of geological conservation however fails to appear in Table 2.2. This is potentially an important omission given the presence of Coal, Fireclay and other mineral resources in the area.

Question 2

4.50 A Water Cycle Strategy needs to be produced and used in the preparation of the LDF to inform on water quality and quantity issues, highlighting areas where new development or intensification of existing development etc could cause overabstraction/environmental deterioration. Such studies are now being promoted within the revision of the Regional Spatial Strategy. Shrewsbury and Atcham Borough Council are currently working on the production of such a study and may be of assistance.

4.51 It should be noted that as the Environment Agency update their Flood Maps quarterly, we do not consider that these are out of date as stated on page XLVII in Appendix B Baseline Data. The Strategic Flood Risk Assessment commissioned by Telford And Wrekin Council should build on these, providing greater detail for example on non-main river flood zones, small catchments and nonfluvial sources of flooding.

4.52 The environmental constraints map contained on page LXXIV correctly identifies Groundwater Source Protection Zones as a constraint to certain developments within identified zones. This information does not seem to have been carried forward into Table 4.1. We therefore suggest that in terms of Question 2, this be considered missing data. (This also needs to be linked to Question 3 below).

4.53 Groundwater monitoring may be necessary both on and off site when planning permissions are granted for new development to ensure that environmental deterioration is not being caused.

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4.54 Pg 28, ENVIRONMENTAL under “water” reference is made generally to water quality. For aquatic ecosystems such as streams and rivers the continuity of open channel, its structure and associated corridor habitat, is as important as basic water quality/quantity (e.g. otters, water vole, native crayfish etc). Additionally the channel structure is important in terms of the flooding and the floodplain.

4.55 Pg 34, ENVIRONMENTAL, Code 07, it is worth noting that brown-field sites often have a higher ecological value/are more bio-diverse than green-field sites. This can lead to a conflict of interests between redeveloping such sites and biodiversity targets/aspirations. This needs consideration and reconciliation.

4.56 Pg 35, Code 10, Re “net change in natural/semi-natural habitats” it would be helpful to make reference to watercourse restoration/rehabilitation through deculverting and positive structural improvements (naturalisation). This would link into the EA’s targets and objectives, as well as to the Strategic Flood Risk Assessment (SFRA) undertaken by Halcrow on behalf of the LPA..

Question 3

4.57 A key sustainability issue which hasn't been included is Flood Risk. A number of properties in the Telford and Wrekin Area are in areas at risk of flooding and were affected by flooding during the Summer 2007 floods. Some of the properties were affected by flooding from fluvial sources (streams, rivers) but many properties were affected from surface water flooding from sewers and drains. The risk of flooding is likely to increase due to the impacts of climate change, this could increase the number of properties at risk of flooding as well as increasing the frequency of flooding occurring within the District.

4.58 The results of the analysis of key sustainability issues are given in Table 4.1. Under the section Environmental the capacity to generate renewable energy is discussed and a number of potential methods listed. The use of ground-source-heat-pumps (hydrothermal energy) is a practical and economic methodology that is rapidly gaining in popularity with a number of such schemes already in operation in the area. This source of energy should be referenced in this document together with its linkages to groundwater resources, Brownfield development and groundwater source protection zones.

Question 6

4.59 Indicators for number 10 should include the length of culverts opened up into open watercourse and the length of watercourse restored. An example of this is the Ibstock development, Lawley, which included significant amounts of culverted watercourse opened up.

4.60 Sustainability Objective on page 36 should refer to all sources of flooding, although new development can be located outside of the floodplains it's essential that new development considers the risk of all sources of flooding (e.g. surface water, artificial sources) and take this risk into account through appropriate design and mitigation. The Strategic Flood Risk Assessment being undertaken by Telford and Wrekin should identify ways in which flood risk can be reduced, these could include opportunities for de-culverting, creating space for flood storage and improving flood flow routes etc.

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Question 7

4.61 Target stated in Table 5.1 Code 14 should read: 91% river lengths in the UK should achieve their assigned river quality objective by 2010

4.62 The following paragraph is applicable to both Questions 7 & 8 as well as Tables 5.1, 5.3, Appendix B Baseline data tables (XLIX): -

4.63 In addition the Water Framework Directive will introduce new targets through river basin management plans. The plans are due to be in place by 2009 with outcomes of the plan to be delivered by 2015. The Water Framework Directive promotes a new holistic approach to water management through river basin planning. It should make it simpler for everyone and result in greater protection for a vital part of our environment. In particular it will help deal with diffuse pollution which remains a big issue after we have improved most point source discharges. It applies to all surface freshwater bodies (including lakes, streams and rivers), groundwaters, groundwater dependant ecosystems, estuaries and coastal waters out to one mile from low-water. Telford and Wrekin falls within the Severn River Basin District. These plans will replace the old river quality objective targets.

Question 8

4.64 Agree with Draft SA Objective 13 'Flood Risk' being sensitive to change. Climate Change will increase the risk of flooding through an expected increase in peak river flow rates of up to 20% and 30% increase in rainfall intensity over the next 30 years. It is therefore important that the LDF includes policies for reducing flood risk.

Question 9

4.65 An essential part of the sustainability appraisal is the undertaking of a Strategic Flood Risk Assessment which is the appropriate assessment for ensuring that flood risk is considered fully as part of the LDF process and demonstrating that the LDF is sound. Telford and Wrekin are part of the Joint Shropshire Level 1 SFRA, which has been accepted by the Environment Agency. Level 2, the final part of the SFRA report has not been undertaken and is required as part of the Sustainability Appraisal .

Lawley and Overdale Parish Council, Sharon Clayton

4.66 I note that the Draft Consultancy for the above has been prepared by Atkins Consultancy and having seen their very thorough and impressive Environmental Analysis on behalf of English Partnerships for the Lawley Sustainable Urban Extension I feel sure that the Scoping Report has addressed all relevant issues and information required as part of the LDF.

4.67 I only have one query on page 33 relative to Q6 & Q7; I think the targets should be defined so that they indicate how much the reduction should be (01) how much to improve year on year, (02) reduce year on year – by how much? (03) increase year on year – by how much. Without an indication of the increase or decrease there is no target in which to measure any success.

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Mr M White

Sustainability Objectives (Q4/5)

1. To reduce poverty and social exclusion – Generic nature makes it unachievable. Needs to be made specific and more closely related to the trends identified in Table 5.3.
- 4.68 4. To provide a range of housing that meets the needs of the Council area – needs to include reference to the development of a supporting infrastructure and the creation of communities
- 4.69 7. To make the best use of previously developed land and buildings – change ‘To use previously developed land and buildings before using greenspace’
- 4.70 8. To reduce the demand for travel and promote modes of travel other than the car – reducing ‘the demand for travel’ is unrealistic and non-specific. Further why not be specific about the need to increase the demand for and supply of public transport. The trend towards greater use of the car will not be reversed unless the council address the specifics of the alternatives
- 4.71 9. To maintain and enhance the quality of the landscape and the countryside – we also need to protect what we have
- 4.72 20. Create a balance of employment opportunities across all sectors – we also need to broaden their diversity and sustain and grow what we have
- 4.73 21. To expand economic investment in the area – needs balancing with social responsibility

Indicators

- 4.74 4. Outdoor space?
- 4.75 8. Travel to leisure/shopping?

Targets

- 4.76 7. 80 per cent of new dwellings to be built on previously developed land?
- 4.77 8. Needs making specific. For example, increase use of public transport by 10 per cent year on year

Trends

- 4.78 Broadly agree with the analysis contained in the document. The impact of car and ‘greenfield development’ on our environment require urgent sustainable action.

Natural England, Eric Steere

Table 2.1 Relevant Policies, plans and programmes

- 4.79 Under the “Local group” of plans, reference needs to be made the “Geodiversity Action Plan 2007”

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Table 2.2 and Table 5.1

Sustainability objectives and Draft SA Framework

4.80 One of the major omissions of the appraisal concerns the lack of any assessment about the availability of water. There are objectives for the quality of water in objective 14 but this does not cover water availability. **Natural England advises** that either this objective 14 is altered to include water availability or a new objective and appropriate targets are introduced to cover this issue.

Table 4.1 Key Sustainability issues in Telford and Wrekin

4.81 Under the Environmental heading Page 28 I again note the reference to water only concerns quality. This should also include quantity/availability.

4.82 Under the reference to sites of geological importance reference should be made to the Geodiversity action plan 2007. The number of RIGS sites in the county is substantially above 200 now (full details can be obtained from the Shropshire Geological Society).

Table 5.1 DraftSEA framework

Landscape

4.83 The indicator and targets relating to the maintaining the character of the AONB with respect to proposals and policies and individual applications could follow the following wording. "Number of plans and proposal agreed by the council where the advice of Natural England and the AONB management plan is not followed". The target being "Nil"

Local Nature Reserves page 35

4.84 The area of Local Nature Reserve target is inappropriate on its own. The council is currently considering a number of new Local Nature Reserve proposals that would make the single target inappropriate. **Natural England suggests two targets.** "No loss of any area of a declared Local Nature Reserve." With an additional target about the area and accessibility of Local Nature Reserves in the Telford and Wrekin area. We can discuss this further.

Local Wildlife sites page 35

4.85 The area of wildlife site target also suffers from similar problem as Local Nature Reserves above. Natural England advises that the target reflects both the protection and management of wildlife sites (which should include sites of geological interest).

Progress to achieving Biodiversity action plan. Page 35

4.86 Nature England would wish to see this extended to sites of geological interest. "Progress towards achieving biodiversity and geodiversity action plan targets" with the indicators from the appropriate documents.

Severn Trent Water, Yemi Ejiwunmi

4.87 STW do not have any comments to the proposed issues, whilst a number of items are highlighted specifically relevant to Severn Trent Water Limited as a statutory undertaker which need to be considered in the scoping report – Water Supply, Water Distribution, Sewage

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Treatment, Sewerage, and Renewable Energies Provision. Particularly seek recognition of the need for suitable Waste Water treatment facilities and growth in supporting network facilities to serve projected growth areas

Sports England, John Berry

Qu1.

4.88 The Regional Plan for Sport should be an important consideration in the PPP review. All audits, assessments and strategies of local sport, recreation or leisure also need to be considered.

Qu2.

4.89 The results of the 'Active People' survey published in December 2006. This survey is the largest ever audit of participation in sport and active recreation to be undertaken in Europe. It is a telephone survey of 363,724 adults in England (aged 16 plus) and is unique in providing reliable statistics on participation in sport and active recreation for all 354 Local Authorities in England (a minimum of 1,000 interviews were completed in every local authority in England). The survey has indicated that in Telford, only 20.6% of the adult population undertake the 3x30 minutes per week moderate intensity sport and active recreation recommended by Government.

4.90 As well as participation rates, the survey also measures the proportion of the adult population that volunteer in sport on a weekly basis, club membership, involvement in organised sport/competition, receipt of tuition or coaching and overall satisfaction with levels of sporting provision in the local community. The questionnaire was designed to enable analysis of the findings by a broad range of demographic information, such as gender, social class, ethnicity, household structure, age and disability. The survey is currently being repeated, with results expected in December 2008.

4.91 Sport England would strongly encourage the use of the data in the baseline. Further information on the survey can be accessed at www.activepeoplesurvey.com

Qu3.

4.92 Given the data provided by the Active People survey, the low percentage of Telford and Wrekin's population taking part in Sport and Active Recreation is a key sustainability issue for the LDF. As an implication for the LDF, the LDF should ensure that appropriate facilities for sport and recreation are available and accessible to all sectors of the population.

Qu4/5/6/7.

4.93 It is pleasing that the indicators for SA objective 5 includes reference to the participation in moderate physical activity, However, this indicator is not clear and it is suggested it should be replaced with '% of population partaking in 3x30 minutes of moderate intensity sport and physical activity per week'. With regard to a target for this indicator, it would be advisable to contact Energise Shropshire Telford & Wrekin (County Sports Partnership) to discuss an appropriate target year or year. Also suggest an addition is made to the 'social' sustainability objective 3 to include an indicator concerning access to and satisfaction with sports facilities.

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Transforming Telford, Alan Bishop

Question 3.

4.94 To our knowledge, outside combined Heat & Power facilities at Harper Adams, there are no major renewable energy sources yet developed in Telford. Proposals for wind turbines for businesses in the north of the Town have not yet been constructed. A more proactive stance on energy efficiency buildings and renewables is needed to encourage such schemes. CHP facilities are being considered for the new schools programme and the Town Centre.

Question 4.

4.95 No direct comments.

Question 5.

4.96 Code 17 To increase energy efficiency and increase the use of renewable energy.

4.97 Targets should be considered for new build given established BREEAM targets and forthcoming EP Code for Sustainable Homes. This should be clear targets for achievement given the scope for new build in Telford. The government has an agenda that all new housing should be carbon neutral by 2016. Telford has the opportunity to be at the forefront of development in this area, greatly enhancing its green credentials.

Question 6.

4.98 Code 7-19 (Environmental)

4.99 The targets set out in this section should try and reflect the targets set out in the Telford Environmental Plan for consistency in planning documents.

4.100 Code 20 (Economic)

4.101 Create balance of employment opportunities across all sectors.

4.102 Indicator:

- a. % change in unemployment rate. This measure does not include everyone that doesn't work, e.g. those on incapacity benefit are not included. We would recommend changing the indicator to ' % change in employment ' as this captures everyone in employment and the data is collected by ONE Annual Population Survey and is published 9 months in arrears.
- b. All people of a working age claiming a key benefit. We are unsure of the definition of a 'key' benefit is but suggest that any target for this indicator should be linked to the worklessness targets that are being established for the Cite Region pilot.
- c. Number of jobs – we recommend that this be broken down to represent the number of jobs by sector (i.e. manufacturing, service, other).

4.103 Code 21 (Economic)

4.104 To expand economic investment in this area.

4.105 Indicator:

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- a. Gross value added (GVA) per capita. We recommend replacing this indicator with 'average earnings of employees' as the data is much more accessible and is available within the year that it is collected. GVA data can be 3-4 years out of date. 2007 data is available from ONS Annual Survey of Hours and Earnings.
- b. Net change in VAT registered businesses. We recommend that this data be presented as per 10,000 of the population to enable useful comparison with other local authorities. It should be noted that TWC & Transforming Telford are not directly responsible for business start-ups. Other organisations such as Business Link, Business Enterprise Support, WiRE are funded by AWM to do this. Overall it is a good measure of business activity, growth and turnover and timely data is available from NOMIS.

Other

4.106 Transforming Telford has an SLA with TWC for delivering economic development services. Other indicators can be agreed between TWC and TT.

Question 7.

4.107 Code 17

4.108 To increase energy efficiency and increase the use of renewable energy.

4.109 Targets for new built housing/commercial could have a significant impact on Telford's ability to deliver these targets, given its focus as a New Growth Point.

4.110 Code 7 (Environmental)

4.111 To make the best use of previously developed land and buildings.

4.112 The actions relate to housing only. Surely this can be extended to employment uses also.

4.113 Code 20 & 21 – please see comments under question 6.

SA Baseline and Trends

4.114 Draft SA Objective 17 – response currently demonstrates little commitment to reversing the position. A stronger commitment to renewables and CHP facilities in the Town could generate higher level of achievement for sustainable development in Telford and lead to more positive outcomes for the Town.

Town Clerk, Wellington Town Council, Howard Perkins

4.115 Scoping Report considered by the Town Council's Planning Committee - no comments made to Borough Council.

5 Appendix E - Relevant Plans and Programmes

5 Appendix E - Relevant Plans and Programmes

Key documents relevant to LDF and SA	Objectives relevant to LDF and SA	Implications for document	Implications for SA
INTERNATIONAL			
<p>The Rio Earth Summit Agreements, 1992: Agenda 21 Rio Declaration on Environment & Development Statement of Forest Principles</p>	<p>Agenda 21 is a comprehensive programme of action for global action in all areas of sustainable development. It includes actions for combating poverty, changing patterns of production & consumption, conserving & managing the natural resources & preventing deforestation etc. The Rio Declaration is a series of 27 principles defining the rights & responsibilities of States. These include:</p> <ul style="list-style-type: none"> • that human beings are at the centre of concerns for sustainable development. They are entitled to a healthy & productive life in harmony with nature; • that scientific uncertainty should not delay measures to prevent environmental degradation where there are threats of serious or irreversible damage <p>The Statement of Forest Principles is a non-legally binding document, which sets out a series of principles for the sustainable management of forests.</p>	<p>Consider principles of LA21 throughout plan making</p>	<p>Incorporate into SA objectives</p>
<p>European Spatial Development Perspective</p>	<ul style="list-style-type: none"> • Promoting a mixture of functions and social groups, particularly in the largest urban areas, to combat the social exclusion part of the population and restructure and reuse areas in crisis and derelict industrial land. • Managing waste and resources such as water, soil and energy intelligently, safeguarding the natural and cultural heritage and expanding natural areas. • Making towns accessible using efficient and non-polluting transport • Rediscovering multifunctionality in an agriculture aiming at quality (food safety, local products, country tourism, development of heritage and landscapes, use of renewable energy) • Need for integrated transport system, particularly public transport • Conservation and sustainable use of biodiversity • Preservation and restoration of landscapes and heritage • Reducing carbon dioxide emissions by promoting settlement structures which use less energy, generate less traffic and make greater use of renewable energy. • Management of surface and groundwater, including use, flooding and drought 	<p>Consider the principles of the European Spatial Development Perspective, through the plan-making process.</p>	<p>SA to reflect objectives, through wording of indicators and objectives</p>
<p>6th Environmental Action Programme for the European Community 2002-2012.</p>	<p>Four priority areas:</p> <ul style="list-style-type: none"> • Climate Change • Nature and Biodiversity • Environment and Health • Natural Resources and Waste 	<p>Consider within the environmental policy</p>	<p>SA to reflect objectives of the Environmental Action Programme through wording of indicators and objectives</p>
<p>Directive on the conservation of wild birds (79/409/EEC)</p>	<p>The Directive relates to the conservation of all species of naturally occurring birds in the wild state in the European territory of the Member States to which the Treaty applies. It covers the protection, management and control of these species and lays down rules for their exploitation. It applies to birds, their eggs, nests.</p> <p>The Directive requires that measures are taken to preserve, maintain or re-establish a diversity of habitats for all the birds listed in Article One.</p>	<p>Consider in environmental policy</p>	<p>Incorporate into environmental set of SA objectives</p>
<p>EU Water Directive, 2000/60/EC and EU Groundwater Daughter Directive 2006/118/EC</p>	<p>The purpose of the Directive is to establish a framework for the protection of inland surface waters, transitional waters, coastal waters and groundwater.</p> <p>The daughter directive focuses on the objectives mentioned above but requires further development to ensure that it is practical, effective, risk-based and proportionate</p>	<p>Need to consider water quality in Environmental Policy section</p>	<p>Ensure water quality is considered in SA objectives and indicator</p>

5 Appendix E - Relevant Plans and Programmes

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European Nitrates Directive (1991)	Reducing water pollution resulting from agricultural sources (spreading or discharge of livestock effluents and the excessive use of fertilisers) and preventing further such pollution	Integrate into plan considerations	Ensure that water quality is considered in SA objectives and indicators
European Air Quality Directive (1992)	Avoid, prevent or reduce concentrations of harmful air pollutants and limit values and/or alert thresholds set for ambient air pollution levels	Need to consider air quality in Environmental Policy sections.	Ensure that air quality is included in SA objectives and indicators
Conservation of Natural Habitats and Wild Flora & Fauna Directive 92/43/EEC	The purpose of the Directive is to contribute towards ensuring biodiversity through the conservation of natural habitats and of wild fauna and flora in the European territory of Member States	Integrate into environmental policies	Incorporate into SA objectives –Indicators could measure impact on habitats, flora and fauna
The UN Framework Convention on Climate Change; the Kyoto Protocol	The UK is a signatory to the Kyoto Protocol, which came into force 21 March 1994. The objective of the Protocol is to achieve the stabilization of greenhouse gases in the atmosphere at a level that would prevent dangerous anthropogenic interference with the climate system. The Protocol includes the principle of taking precautionary measures to anticipate, prevent or minimise the causes of climate change and to mitigate its adverse effects.	Integrate into all plan considerations	Ensure climate change considerations are incorporated into SA objectives
Energy Performance in Buildings Directive 2002/91/EEC	The objective of the Directive is to promote the improvement of the energy performance of buildings within the Community [EC], taking into account outdoor climatic and local conditions, as well as indoor climate requirements and cost effectiveness.	Incorporate into SPD on design	Due to be transposed into UK law 4 January 2006. Incorporate into SA indicators use of Energy Efficiency
NATIONAL			
Securing the Future. The UK Government Sustainable Development Strategy (March 2005)	<p>Sustainable Consumption and Production – Sustainable consumption and production is about achieving more with less. This means not only looking at how goods and services are produced, but also the impacts of products and materials across their whole lifecycle and building on people's awareness of social and environmental concerns. This includes reducing the inefficient use of resources which are a drag on the economy, so helping boost business competitiveness and to break the link between economic growth and environmental degradation.</p> <p>Climate Change and Energy – The effects of a changing climate can already be seen. Temperatures and sea levels are rising, ice and snow cover are declining, and the consequences could be catastrophic for the natural world and society. Scientific evidence points to the release of greenhouse gases, such as carbon dioxide and methane, into the atmosphere by human activity as the primary cause of climatic change. We will seek to secure a profound change in the way we generate and use energy, and in other activities that release these gases. At the same time we must prepare for the climate change that cannot now be avoided. We must set a good example and will encourage others to follow it.</p>	Ensure that the principles of sustainable development are echoed in the objectives and indicators of the SA	

5 Appendix E - Relevant Plans and Programmes

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	<p>Natural Resource Protection and Environmental Enhancement – Natural resources are vital to our existence and that of communities throughout the world. We need a better understanding of environmental limits, environmental enhancement and recovery where the environment is most degraded to ensure a decent environment for everyone and a more integrated policy framework.</p> <p>Sustainable Communities – The aim is to create sustainable communities that embody the principles of sustainable development at the local level. This will involve working to give communities more power and say in the decisions that affect them; and working in partnership at the right level to get things done. The UK uses the same principles of engagement, partnership and programmes of aid in order to tackle poverty and environmental degradation and to ensure good governance in overseas communities.</p>	<p>communities, facilitating the involvement of local communities in the decision-making process</p>	
<p>Energy White Paper, 2003</p>	<p>The White Paper has four key goals:</p> <ul style="list-style-type: none"> • to put ourselves on a path to cut the UK's carbon dioxide emissions by some 60% by about 2050, with real progress by 2020; • to maintain the reliability of supplies; • to promote competitive markets in the UK and beyond, helping to raise the rate of sustainable economic growth and to improve our productivity; • to ensure that every home is adequately and affordably heated. 	<p>Ensure that measures are translated into policies at all levels of plan, especially in Reducing Carbon Burden SPD</p>	<p>Measure achievement of incorporation of Energy Efficiency Measures</p>
<p>Planning Policy Statement 1: Delivering Sustainable Development 2006</p>	<p>Committed to the principles of sustainable development. Planning should facilitate and promote sustainable and inclusive patterns of urban and rural development by:</p> <ul style="list-style-type: none"> • making suitable land available for development in line with economic, social and environmental objectives to improve people's quality of life; • contributing to sustainable economic development; • protecting and enhancing the natural and historic environment, the quality and character of the countryside, and existing communities; • ensuring high quality development through good and inclusive design, and the efficient use of resources; and, • ensuring that development supports existing communities and contributes to the creation of safe, sustainable, liveable and mixed communities with good access to jobs and key services for all members of the community. 	<p>- Policies need to adhere to, facilitate and promote the principles of sustainable development. Opportunity to include positive policies that encourage development in sustainable locations while protecting and enhancing the natural and historic environment.</p> <p>- Should include a policy relating to the quality of development through good design and the efficient use of resources.</p> <p>- Policies need to support the integration of new</p>	<p>SA should include all sustainability issues and include indicators for the following issues:</p> <p>development on previously developed land;</p> <p>economic development;</p> <p>protecting and enhancing the natural and historic environment;</p> <p>good design with resources; support of existing communities</p>

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Key documents relevant to LDF and SA	Objectives relevant to LDF and SA	Implications for document	Implications for SA
<p>Planning Policy Statement 1, Supplement: Planning and Climate Change, December 2007</p>	<p>This PPS on climate change supplements PPS1 by setting out how planning should contribute to reducing emissions and stabilising climate change and take into account the unavoidable consequences.</p> <p>To deliver sustainable development, and in doing so a full and appropriate response on climate change, regional planning bodies and all planning authorities should prepare, and manage the delivery of, spatial strategies that:</p> <ul style="list-style-type: none"> – make a full contribution to delivering the Government's Climate Change Programme and energy policies, and in doing so contribute to global sustainability; – in providing for the homes, jobs, services and infrastructure needed by communities, and in renewing and shaping the places where they live and work, secure the highest viable resource and energy efficiency and reduction in emissions; – deliver patterns of urban growth and sustainable rural developments that help secure the fullest possible use of sustainable transport for moving freight, public transport, cycling and walking; and, which overall, reduce the need to travel, especially by car; – secure new development and shape places that minimise vulnerability, and provide resilience, to climate change; and in ways that are consistent with social cohesion and inclusion; – conserve and enhance biodiversity, recognising that the distribution of habitats and species will be affected by climate change; 	<p>development into existing communities and contribute to mixed communities with access to services and facilities</p> <p>Incorporate into all plan considerations</p>	<p>Ensure climate change considerations are incorporated into SA objectives</p>

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	<ul style="list-style-type: none"> - reflect the development needs and interests of communities and enable them to contribute effectively to tackling climate change; and - respond to the concerns of business and encourage competitiveness and technological innovation in mitigating and adapting to climate change. 		
<p>Planning Policy Statement 3: Housing</p>	<p>The Government's key housing policy goal is to ensure that everyone has the opportunity of living in a decent home, which they can afford, in a community where they want to live. To achieve this, the Government is seeking:</p> <ul style="list-style-type: none"> - To achieve a wide choice of high quality homes, both affordable and market housing, to address the requirements of the community. - To widen opportunities for home ownership and ensure high quality housing for those who cannot afford market housing, in particular those who are vulnerable or in need. - To improve affordability across the housing market, including by increasing the supply of housing. - To create sustainable, inclusive, mixed communities in all areas, both urban and rural <p>These housing policy objectives provide the context for planning for housing through development plans and planning decisions. The specific outcomes that the planning system should deliver are:</p> <ul style="list-style-type: none"> - High quality housing that is well-designed and built to a high standard. - A mix of housing, both market and affordable, particularly in terms of tenure and price, to support a wide variety of households in all areas, both urban and rural. - A sufficient quantity of housing taking into account need and demand and seeking to improve choice. - Housing developments in suitable locations, which offer a good range of community facilities and with good access to jobs, key services and infrastructure. - A flexible, responsive supply of land – managed in a way that makes efficient and effective use of land, including re-use of previously-developed land, where appropriate 	<p>Integrate housing themes into relevant sections of the LDF</p>	<p>Incorporate into SA objectives and indicators.</p>
<p>PPG 4: Industrial, Commercial development and small firms</p>	<p>Development Plans offer the opportunity to:</p> <ul style="list-style-type: none"> • encourage new development in locations which minimise the length and number of trips, especially by motor vehicles; • encourage new development in locations that can be served by more energy efficient modes of transport (this is particularly important in the case of offices, light industrial development, and campus style developments such as science and business parks likely to have large 	<p>Consider transferring themes into Economy section of plan</p>	<p>Transfer into Economic SA Objectives</p>

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	<p>numbers of employees);</p> <ul style="list-style-type: none"> discourage new development where it would be likely to add unacceptably to congestion; locate development requiring access mainly to local roads away from trunk roads, to avoid unnecessary congestion on roads designed for longer distance movement. 		
PPS 6: Planning for Town Centres	<p>The Government's key objectives for town centres is to promote their vitality and viability by:</p> <ul style="list-style-type: none"> planning for the growth and development of existing centres; and promoting and enhancing existing centres, by focusing development in such centres and encouraging a wide range of services in a good environment, accessible to all. 	<p>Incorporate into Development</p> <p>Control DPD and Central Telford</p> <p>Area Action Plan</p>	<p>Consider implications for SA framework</p>
PPS 7: Sustainable Development in Rural Areas	<p>To raise the quality of life and the environment in rural areas</p> <ul style="list-style-type: none"> To promote more sustainable patterns of development: Promoting the development of the English regions by improving their economic performance so that all are able to reach their full potential To promote sustainable, diverse and adaptable agriculture sectors 	<p>Include in policies for planning in rural areas</p>	<p>Consider for inclusion in SA objectives</p>
PPG 8: Telecommunications	<ul style="list-style-type: none"> to facilitate the growth of new and existing telecommunications systems whilst keeping the environmental impact to a minimum. to ensure that people have a choice as to who provides their telecommunications service, a wider range of services from which to choose and equitable access to the latest technologies as they become available. Material considerations include the significance of the proposed development as part of a national network. Authorities should not seek to prevent competition between different operators and should not question the need for the telecommunications system which the proposed development is to support. 	<p>Incorporate into telecommunications policy within plan to facilitate use of telecommunications and advances in technology</p>	<p>Encourage consideration in indicators of use of telecommunication as an alternative to traditional methods that are less sustainable</p>
PPS9: Biodiversity and Geological Conservation	<p>Key principles:</p> <p>(i) Development plan policies and planning decisions should be based upon up-to-date information, including the relevant biodiversity and geological resources of the area. Local authorities should assess the potential to sustain and enhance those resources.</p> <p>(ii) Plan policies and planning decisions should aim to maintain, and enhance, restore or add to biodiversity and geological conservation interests. In taking decisions, local planning authorities should ensure that appropriate weight is attached to designated sites of international, national and local importance; protected species; and to biodiversity and geological interests within the wider environment.</p>	<p>Incorporate into biodiversity policies within plan to ensure that the biodiversity and geological resources are sustained and enhanced where possible</p>	<p>Incorporate in SA indicators and objectives</p>

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Key documents relevant to LDF and SA	Objectives relevant to LDF and SA	Implications for document	Implications for SA
	<p>(iii) Plan policies on the form and location of development should take a strategic approach to the conservation, enhancement and restoration of biodiversity and geology, and recognise the contributions that sites, areas and features, both individually and in combination, make to conserving these resources.</p> <p>(iv) Plan policies should promote opportunities for the incorporation of beneficial biodiversity and geological features within the design of development.</p> <p>(v) Development proposals where the principal objective is to conserve or enhance biodiversity and geological conservation interests should be permitted.</p> <p>(vi) The aim of planning decisions should be to prevent harm to biodiversity and geological conservation interests. If that significant harm cannot be prevented, adequately mitigated against, or compensated for, then planning permission should be refused.</p>		
<p>PPS10 Planning for Sustainable Waste Management</p>	<ul style="list-style-type: none"> - help deliver sustainable development through driving waste management up the waste hierarchy; - provide a framework in which communities take more responsibility for their own waste, and enable sufficient and timely provision of waste management facilities to meet the needs of their communities; - help implement the national waste strategy, and supporting targets; - help secure the recovery or disposal of waste without endangering human health and without harming the environment, and enable waste to be disposed of in one of the nearest appropriate installations; - reflect the concerns and interests of communities, the needs of waste collection authorities, waste disposal authorities and business, and encourage competitiveness; - protect green belts but recognise the particular locational needs of some types of waste management facilities when defining detailed green belt boundaries and, in determining planning applications, that these locational needs, together with the wider environmental and economic benefits of sustainable waste management, are material considerations that should be given significant weight in determining whether proposals should be given planning permission; - ensure the design and layout of new development supports sustainable waste management. 	<p>Ensure that waste implications for all plans and strategies are considered. LDD policies to conform to national guidance and extant legislation / targets</p>	<p>SA to reflect PPS10 objectives, through wording of objectives</p>
<p>PPS11: Regional Spatial Strategy West Midlands (RSS)</p>	<p>See Regional Plans Section</p>		
<p>PPS12: Local Development Frameworks</p>	<p>PPS12 aims to promote a proactive, positive approach to managing development.</p> <p>The key aims are:</p> <ul style="list-style-type: none"> • Flexibility – responding to changing local circumstances to ensure plans are prepared and reviewed more quickly 	<p>Integrate at all levels of plan including the Statement of Community Involvement and Local Development Scheme</p>	<p>Ensure that themes of PPS12 are transferred into methodology of undertaking SA</p>

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Key documents relevant to LDF and SA	Objectives relevant to LDF and SA	Implications for document	Implications for SA
<p>PPG13: Transport</p>	<ul style="list-style-type: none"> • Strengthening Community and Stakeholder Involvement • Front Loading – seek consensus on essential issues early in the preparation of the LDF • Sustainability Appraisal – ensure that LDF documents are prepared with the objective of contributing to the achievement of sustainable development • Programme Management • Soundness – ensuring the LDD'S are soundly based in terms of content and process with a credible evidence base. • actively manage the pattern of urban growth to make the fullest use of public transport, and focus major generators of travel demand in city, town and Council area centres and near to major public transport interchanges; • locate day to day facilities which need to be near their clients in local centres so that they are accessible by walking and cycling; • accommodate housing principally within existing urban areas, planning for increased intensity of development for both housing and other uses at locations which are highly accessible by public transport, walking and cycling; • ensure that development comprising jobs, shopping, leisure and services offers a realistic choice of access by public transport, walking, and cycling, recognising that this may be less achievable in some rural areas; • in rural areas, locate most development for housing, jobs, shopping, leisure and services in local service centres which are designated in the development plan to act as focal points for housing, transport and other services, and encourage better transport provision in the countryside; • ensure that strategies in the development and local transport plan complement each other and that consideration of development plan allocations and local transport investment and priorities are closely linked; • use parking policies, alongside other planning and transport measures, to promote sustainable transport choices and reduce reliance on the car for work and other journeys; • give priority to people over ease of traffic movement and plan to provide more road space to pedestrians, cyclists and public transport in town centres, local neighbourhoods and other areas with a mixture of land uses; • ensure that the needs of disabled people as pedestrians, public transport users and motorists - are taken into account in the implementation of planning policies and traffic management schemes, and in the design of individual developments; • consider how best to reduce crime and the fear of crime, and seek by the design and layout of developments and areas, to secure community safety and road safety; and protect sites and routes which could be critical in developing infrastructure to widen transport choices for both passenger and freight movements. 	<p>Ensure that transport implications of all plans and spatial strategies are considered at all levels of plan</p>	<p>Incorporate into SA objectives and Indicators</p>
<p>PPG14: Development of Unstable Land</p>	<p>To advise local authorities, landowners and developers on the exercise of planning controls over development on land which is unstable or is potentially unstable. The aim is not to prevent the development of such land, though in some cases that may be the appropriate response. Rather it is to ensure that development is suitable and that the physical constraints on the land are taken into account at all stages of planning.</p>	<p>Consider for inclusion in plan</p>	

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<p>PPG15: Planning and the historic environment</p>	<p>Any scope for remedial, preventive or precautionary measures must also be fully explored so that land is not sterilised unnecessarily. It is equally important that where instability problems do arise, they should be adequately recorded so that the experience gained can be of benefit to the wider community.</p> <ul style="list-style-type: none"> • There should be effective protection for all aspects of the historic environment. The physical survivals of our past are to be valued and protected for their own sake, as a central part of our cultural heritage and our sense of national identity. They are an irreplaceable record which contributes, through formal education and in many other ways, to our understanding of both the present and the past. Their presence adds to the quality of our lives, by enhancing the familiar and cherished local scene and sustaining the sense of local distinctiveness which is so important an aspect of the character and appearance of our towns, villages and countryside. The historic environment is also of immense importance for leisure and recreation. • ensure that the means are available to identify what is special in the historic environment; to • define, through the development plan system its capacity for change; and, when proposals for new development come forward, to assess their impact on the historic environment and give it full weight, alongside other considerations. 	<p>Incorporate into plan in environmental and built environment sections and design SPD</p>	<p>Consider inclusion in SA Objectives</p>
<p>PPG16: Archaeology and Planning</p>	<p>Reconcile the need for development with the interests of conservation including archaeology. Detailed development plans (i.e. local plans and unitary development plans) should include policies for the protection, enhancement and preservation of sites of archaeological interest and of their settings. The proposals map should define the areas and sites to which the policies and proposals apply. These policies will provide an important part of the framework for the consideration of individual proposals for development which affect archaeological remains and they will help guide developers preparing planning applications</p>	<p>Consider inclusion in plan at local level</p>	<p>Consider in SA Objectives</p>
<p>PPG17: Open Space, sport and recreation</p>	<p>Open spaces, sport and recreation all underpin people's quality of life.</p> <p>Well designed and implemented planning policies for open space, sport and recreation are therefore fundamental to delivering broader Government objectives.</p> <ul style="list-style-type: none"> • supporting an urban renaissance, supporting a rural renewal, promotion of social inclusion and community cohesion, health and well being, promoting more sustainable development • Local authorities should undertake robust assessments of the existing and future needs of their communities for open space, sports and recreational facilities. 	<p>Ensure plan includes appropriate open space policies and effective Green Space Strategy</p>	<p>Contain within SA Objectives and measure access to.</p>
<p>PPG19: Outdoor Advertisement Control</p>	<p>To control advertisements, when it is justified, in the interests of "amenity" and "public safety"</p>	<p>Contain within Development Control Policies</p>	<p>Consider inclusion in SA Objectives</p>
<p>Good Practice Guide on Planning for Tourism, May 2006</p>	<p>The guide is designed to:</p> <ul style="list-style-type: none"> • Ensure that planners understand the importance of tourism and take this fully into account when preparing development plans and taking planning decisions • Ensure that those involved in the tourism industry understands the principles of national planning policy as they apply to tourism and how these can be applied when preparing individual planning applications and • Ensure that planners and the tourism industry work together effectively to facilitate, promote and deliver new tourism development in a sustainable way. 	<p>Consideration in the plan preparation</p>	<p>Consider inclusion in SA Objectives</p>

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Key documents relevant to LDF and SA	Objectives relevant to LDF and SA	Implications for document	Implications for SA
PPS22: Renewable Energy August 2004	<ul style="list-style-type: none"> Renewable energy developments should be capable of being accommodated throughout England in locations where the technology is viable and environmental, economic, and social impacts can be addressed satisfactorily. policies designed to promote and encourage, rather than restrict, the development of renewable energy resources. recognise the full range of renewable energy sources, their differing characteristics, locational requirements and the potential for exploiting them subject to appropriate environmental safeguards. set out the criteria that will be applied in assessing applications for planning permission for renewable energy projects. 	Contain policies in LDF for Renewable Energy projects within Environment Sections	Consider in SA Objectives
PPS23 – Planning and Pollution Control	<ul style="list-style-type: none"> Constraints on development as a result of the need to comply with any statutory environmental quality standards or objectives; Identification of land, or establishment of criteria, for the location of those types of development which may have the potential to pollute, in a particular industry within the special industrial use classes and power stations; Separation of potentially polluting and other land uses to reduce conflicts, for example by identifying areas around polluting land uses in which other developments should be subject to special consideration; Impact of potentially polluting development on land use, including the effects on health, the natural environment, or general amenity, resulting from releases to water, land or air, or of noise, dust, vibration, light or heat; Environmental consequences, where known, of former land uses, manifested for example by contaminated land; Completed landfill sites that would be suitable for development or other use; the plan may make clear the types of development that would be appropriate and, where possible, the minimum time lapse between the completion of the landfill and the start of different types of development, taking into account the potential for pollution in relation to the types and quantities of waste deposited; the need to secure restoration and pollution controls to standards sufficient to ensure that land is capable of an acceptable after use; the need to protect natural resources and improve the physical environment; and the economic and wider social need for potentially polluting development and the requirement to identify appropriate locations for such developments. 	Policy required to ensure that criteria are established for the location of development with the potential to pollute, including the separation from other land uses to avoid conflict and the need to assess the potential impact of such pollutants to the environment and quality of life.	Indicators relating to different types of pollution e.g. air, water, land from different sources e.g. noise, vibration, light, dust.
PPG24: Planning and Noise	<ul style="list-style-type: none"> noise-sensitive developments are located away from existing sources of significant noise (or programmed development such as new roads) and that potentially noisy developments are located in areas where noise will not be such an important consideration or where its impact can be minimised. avoid potentially noisy developments in areas, which have remained relatively undisturbed by noise nuisance and are prized for their recreational and amenity value for this reason. 	Contain within LDF policies in the environmental section and location of development to minimise bad neighbours	Contain within SA Objectives and indicators
PPS25: Development and Flood Risk and Flood Risk Practice Guide	<p>Regional planning bodies (RPBs) 2 and local planning authorities (LPAs) should prepare and implement planning strategies that help to deliver sustainable development by:</p> <p>Appraising risk</p> <ul style="list-style-type: none"> identifying land at risk and the degree of risk of flooding from river, sea and other sources in their areas; preparing Regional Flood Risk Appraisals (RFRAs) or Strategic Flood Risk Assessments 	Policy required to ensure that criteria are established for the location of development in areas which avoid flood risk and manage any residual risks.	Include indicators relating to methods of reducing and mitigating flood risk.

5 Appendix E - Relevant Plans and Programmes

Key documents relevant to LDF and SA	Objectives relevant to LDF and SA	Implications for document	Implications for SA
	<p>(SFRAs) as appropriate, as freestanding assessments that contribute to the Sustainability Appraisal of their plans;</p> <p>Managing risk</p> <ul style="list-style-type: none"> • framing policies for the location of development which avoid flood risk to people and property where possible, and manage any residual risk, taking account of the impacts of climate change; • only permitting development in areas of flood risk when there are no reasonably available sites in areas of lower flood risk and benefits of the development outweigh the risks from flooding; <p>Reducing risk</p> <ul style="list-style-type: none"> • safeguarding land from development that is required for current and future flood management e.g. conveyance and storage of flood water, and flood defences; • reducing flood risk to and from new development through location, layout and design, incorporating sustainable drainage systems (SUDS); • using opportunities offered by new development to reduce the causes and impacts of flooding e.g. surface water management plans; making the most of the benefits of green infrastructure for flood storage, conveyance and SUDS; re-creating functional floodplain; and setting back defences; 		
REGIONAL			
<p>West Midlands Regional Spatial Strategy January 2008</p>	<p>The Spatial Strategy Objectives of the plan are:</p> <ul style="list-style-type: none"> • To make the Major Urban Areas of the West Midlands increasingly attractive places where people want to live, work and invest • To secure the regeneration of the rural areas of the region • To create a joined up multi centred Regional structure where al areas / centres have Council area roles to play • To retain the Green Belt, but allow adjustment of boundaries where this is necessary to support urban regeneration • To support the cities and towns of the Region to meet their local and sub regional development needs • To support the diversification and modernisation of the Region's economy while ensuring that opportunities for growth are linked to meeting needs and reducing social exclusion • To ensure the quality of the environment is conserved and enhanced across all parts of the Region • To improve significantly the Region's transport systems 	<p>(Incorporates the Regional Transport Strategy) Incorporate in all levels of plan especially Core Strategy</p>	<p>Transfer themes into SA Objectives</p>

5 Appendix E - Relevant Plans and Programmes

Key documents relevant to LDF and SA	Objectives relevant to LDF and SA	Implications for document	Implications for SA
	<ul style="list-style-type: none"> To promote the development of a network of strategic centres across the Region; and To promote Birmingham as a world city 		
Regional Biodiversity Strategy for the West Midlands Jan 2005	<ul style="list-style-type: none"> Maintaining and improving the condition of habitats, species and ecosystems Developing an area based approach to restoring wildlife Monitoring the condition of habitats, species and ecosystems Re-connecting and integrating action for biodiversity with other environmental, social and economic activity Coping with the impacts of climate change 	Ensure considerations are included in Environmental sections and policies of the plan	Incorporate into SA objectives and measure condition of habitats and species in indicators as appropriate
West Midlands Regional Energy Strategy, November 2004	The four objectives of the Strategy are: <ul style="list-style-type: none"> improving energy efficiency; increasing the use of renewable energy resources; maximising the uptake of business opportunities; ensuring focused & integrated delivery & implementation 	Incorporate targets for tackling climate change – in Core Strategy and Energy Efficiency section / Design Guide SPD	Incorporate into SA objectives for Energy Efficiency
West Midlands Economic Strategy Connecting to Success December 2007	The strategy aims to raise output per head in the West Midlands to at least the average for the UK as a whole. Hailed as the UK's first low carbon Regional Economic Strategy sets the vision of the region as a 'global centre where people and businesses choose to connect'. The strategy focuses on the three main components of the economy - Business, Place and People. Challenges the West Midlands Region must overcome are: <ul style="list-style-type: none"> To develop a diverse and dynamic business base To promote a learning and skilful region To create the conditions for growth To regenerate communities Providing a powerful voice for the region 	Incorporate implications into economic section / policies of LDF	Contain economic considerations in SA Objectives and Indicators