# Sustainability Appraisal

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Appendix A – Appraisal Tables
Introduction

1.1 This report details the findings of the Sustainability Appraisal of the City Centre and Etruria Road Area Action Plan Pre-Publication draft.

1.2 The purpose of the Sustainability Appraisal process is to appraise the social, environmental and economic effects of a plan or project. This approach will ensure that decisions are made that contribute to achieving sustainable development. Sustainability Appraisal involves taking a long term view of the possible impacts of policies upon the social, economic and environmental sustainability of the wider area. It also provides a framework for ensuring that policies reflect global, national, regional and local sustainability objectives.

1.3 The requirements for undertaking a Sustainability Appraisal are set out in section 39(2) of the Planning and Compulsory Purchase Act 2004 (as amended in 2008) which is in conformity with the requirements outlined in the European Union ‘Strategic Environmental Assessment Directive’.

1.4 This report includes the following sections:-

**Background** – provides an explanation of the purpose, scope, key outputs and process of the Area Action Plan.

**Methodology** – provides an overview of the previous stages of Sustainability Appraisal for the Area Action Plan and details the methodology used in this appraisal.

**Sustainability Appraisal** – the appraisal of the aims, strategy and policies of the Area Action Plan.

**Next Steps** – guidance on the following steps in the Area Action Plan and Sustainability Appraisal process.

**Appendices** – appraisal tables of the strategy and policies of the Area Action Plan.
Background

2.1 There is no escaping the fact that in terms of performance, the City Centre of Stoke-on-Trent has fallen behind its peer cities. This shortfall has not been adequately addressed and unlike comparable city centres across the UK, the City Centre still faces the challenge of delivering regeneration. However, a clear vision for the City Centre now exists and the mechanisms to deliver this change are in place. In addition to this a number of projects and plans are in place that are starting to deliver the transformational changes the City Centre needs.

2.2 The City Centre and Etruria Road Corridor Area Action Plan is the key statutory planning document to deliver this change. It draws from a wide variety of supporting evidence such as the Sustainable Community Strategy and Newcastle-under-Lyme and Stoke-on-Trent Core Spatial Strategy to provide one collective vision for the City Centre.

2.3 The Area Action Plan can be summarised as follows:

Purpose

2.4 The purpose of the City Centre and Etruria Road Corridor Area Action Plan is to provide detailed planning policies to guide and help deliver the regeneration of the City Centre over the next fifteen to twenty years. The plan contains more detailed proposals for the City Centre compared to the Core Spatial Strategy, which looks at broader issues over a wider area.

2.5 The Area Action Plan (along with Core Spatial Strategy), upon adoption, will provide the statutory planning guidance to consider planning applications against within the City Centre and will form part of the Local Development Framework.

Scope

2.6 The plan covers the key geographical areas in the City Centre such as the primary and secondary shopping areas, the cultural quarter, the emerging central business district, the conservation area and the key elements of the public realm.

2.7 The Area Action Plan takes forward the adopted planning guidance in the Core Spatial Strategy and also provides the following:

- A spatial vision and a number of objectives up to 2026;
- A summary of the issues and options which have been considered in developing the Area Action Plan strategy;
- A set of proposals and policies to achieve the vision and area spatial strategy set out in the Core Spatial Strategy;
- A broad strategy; detailed proposals maps showing land allocations; infrastructure framework and design guidance within the Area Action Plan area;
Details of areas where there are opportunities for significant change and indicates the type of uses that would be appropriate, such as shopping, offices, housing and leisure;

An explanation of how these proposals and policies will be monitored and implemented;

Strategy and Policies

2.8 The Area Action Plan is made up of the following strategies and policies which have been appraised:

Strategies

1 - Shopping Options
2 - Office Options
3 - Home Options
4 - Leisure, tourism and culture
5 - Public places and green spaces
6 - Transportation
7 - Climate Change and Sustainability

Policies

SS1 - Retail Magnets
SS2 - The City Centre and Important Retail Areas
SS3 - Primary and Secondary shopping frontages
SS4 - Phasing of retail development
SS5 - Superstores and Retail Parks
SS6 - City Centre living
SS7 - Community Facilities and Public Services
SS8 - Economy and Employment
SS9 - Evening Economy
SS8 - Economy and Employment
SS9 - Evening Economy
SS10 - Leisure, tourism and cultural development
SS11 - Cultural Quarter
SS12 - City Centre Conservation Areas
SS13 - Features of Heritage Importance
SS14 - Public Realm
SS15 - Design Quality
SS16 - Transport and Accessibility
SS17 - Parking
SS19 - A bio diverse environment
SS18 - Sustainable Design and Construction
SS20 - Development Portfolio
SS21 - North West Inner Quadrant
Process

2.9 To date the Area Action Plan has been through the following stages of production:-

- Commencement (November 2004)
- Issues and Options (March 2005)
- Preferred Options (August 2007)

2.10 The current Area Action Plan (which this Sustainability Appraisal relates to) is the ‘Pre-Publication’ City Centre and Etruria Road Corridor Area Action Plan. The Pre-Publication document will be consulted on with key stakeholders. Following this the plan will be formally published (under regulation 27) and made available for public scrutiny and comment) prior to being formally submitted to the Secretary of State (under regulation 30).

2.11 The submission document will then be examined by an independent Planning Inspector appointed by the Secretary of State to test the ‘soundness’ of the plan as identified in Planning Policy Statement 12 - ‘Local Spatial Planning’. The Inspector’s report will be binding on the City Council and the plan will be moved forward to adoption.

2.12 The anticipated timetable for the completion of the Area Action Plan is detailed in the diagram below:-

Pre-publication Stage (this document)

Publication under Regulation 27*

Submission under Regulation 30*

Examination by Planning Inspector

Adoption

October 2010

November 2010

January 2011

January 2011 - May 2011

September 2011
**Methodology**

3.1 Plans naturally evolve between consultation periods. This is in part due to changing legislation, developments in best practice and as a result of representations received from stakeholders. To ensure that the principles of sustainability are embedded within the plan making process it is important that some form of appraisal is undertaken at every stage and that it is an ‘iterative’ process (i.e. repeating a process with the aim of approaching a desired result).

3.2 For the pre-publication stage a sustainability appraisal has been undertaken which is consistent with the Sustainability Appraisal of the Preferred Options ‘Draft Spatial Options’ Area Action Plan and the Sustainability Appraisal of the Newcastle-under-Lyme and Stoke-on-Trent Core Spatial Strategy.

**Objectives**

3.3 This appraisal used the following sustainability objectives from the Newcastle-under-Lyme and Stoke-on-Trent Core Spatial Strategy Sustainability Appraisal:-

<table>
<thead>
<tr>
<th>SUSTAINABILITY OBJECTIVES (SO)</th>
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<tbody>
<tr>
<td>1.   To help to meet the housing needs of the whole community</td>
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<tr>
<td>2.   To increase life expectancy and improve the health of the population overall</td>
</tr>
<tr>
<td>3.   To provide the best possible environment to encourage and increase economic enterprise</td>
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<tr>
<td>and employment</td>
</tr>
<tr>
<td>4.   To enable access to the widest range possible of shopping and commercial services for</td>
</tr>
<tr>
<td>the resident population</td>
</tr>
<tr>
<td>5.   To protect and enhance the vitality and viability of the city, town and district</td>
</tr>
<tr>
<td>centres within the conurbation and village centres in the rural area</td>
</tr>
<tr>
<td>6.   To provide a more equitable society where the provision of the widest possible range</td>
</tr>
<tr>
<td>of community, cultural, educational, health, recreational and leisure facilities are</td>
</tr>
<tr>
<td>available to all sectors of the population with particular emphasis on deprived</td>
</tr>
<tr>
<td>neighbourhoods</td>
</tr>
<tr>
<td>7.   Reduce crime and the fear of crime</td>
</tr>
<tr>
<td>8.   To reduce the need to travel while increasing accessibility for all</td>
</tr>
<tr>
<td>9.   To encourage the use of public transport, cycling and walking</td>
</tr>
<tr>
<td>10.  To increase the use of renewable energy and energy efficiency in existing and new</td>
</tr>
<tr>
<td>development and redevelopment</td>
</tr>
<tr>
<td>11.  To improve air quality, creating cleaner and healthier air</td>
</tr>
<tr>
<td>12.  Retain and enhance the species and habitats targeted for improvement in the Stafford-</td>
</tr>
<tr>
<td>shire Biodiversity Action Plan</td>
</tr>
<tr>
<td>13.  Ensure that there is no loss in the extent and quality of SBIs, LNRs and RIGs</td>
</tr>
<tr>
<td>14.  Increase the amount of accessible natural green space</td>
</tr>
<tr>
<td>15.  Reduce the amount of land SSSIs classified in an ‘unfavourable’ condition</td>
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<tr>
<td>16.  To reduce contamination, regenerate degraded environments, maintain soil resources,</td>
</tr>
<tr>
<td>air quality and minimise development on greenfield sites</td>
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<tr>
<td>17.  To reduce the amount of development within the floodplain and promote the use of</td>
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<tr>
<td>sustainable drainage systems</td>
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<tr>
<td>18.  To increase the efficient use of water resources</td>
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</tbody>
</table>
19. To improve water quality and meet the requirements of the Water Framework Directive

20. To help to maintain distinctiveness and foster interest in and concern for the heritage of the area

21. To help to provide a safe, efficient highway network and improve the viability of public transport

3.4 These objectives were revised through the latter stages of the Core Strategy production process and therefore they are considered to be more up-to-date than the objectives used in the previous round of Sustainability Appraisal for the City Centre and Etruria Road Corridor Area Action Plan. In addition to this it is considered that using the objectives of the Sustainability Appraisal for the Core Strategy will ensure consistency and avoid conflict with other plans.

**Framework**

3.5 The following framework has been used to appraise the Pre-Publication City Centre and Etruria Road Corridor Area Action Plan:-

<table>
<thead>
<tr>
<th>SA Objective</th>
<th>Area Action Plan</th>
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<tbody>
<tr>
<td></td>
<td>Effect</td>
</tr>
<tr>
<td></td>
<td>Major positive effect</td>
</tr>
<tr>
<td></td>
<td>Positive effect</td>
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<tr>
<td></td>
<td>No effect</td>
</tr>
<tr>
<td></td>
<td>Negative effect</td>
</tr>
<tr>
<td></td>
<td>Major negative effect</td>
</tr>
<tr>
<td></td>
<td>Effect unknown/uncertain</td>
</tr>
</tbody>
</table>

Effect

- ✔ ✔ Major positive effect
- ✔ Positive effect
- No effect
- ✗ Negative effect
- ✗ ✗ Major negative effect
- ? Effect unknown/uncertain
3.6 This framework is similar in format to that used in the Core Spatial Strategy Sustainability Appraisal. However, there are the following differences:-

- The framework includes objectives only and not indicators;
- The column on key baseline data has been removed;
- The ‘impact’ column has been renamed ‘effect’;
- The ‘likely timing of impact’ column has been replaced with a ‘duration’ column;
- Urban and rural classifications within the ‘geographical scale’ column have been replaced by local (City Centre); city (authority wide), sub-regional and regional; and
- The ‘commentary’ column has been divided into two separate columns of ‘description’ and ‘recommendations’.

3.7 The amendments to the framework have been incorporated to make the framework more relevant to the type of document being produced, concise, less repetitive and efficient. In addition it reflects more accurately Government and best practice guidance on Sustainability Appraisal (see www.pas.gov.uk). The division of the commentary column will allow the effect to be described separately and a separate recommendation to be provided.

3.8 The appraisal assesses the strategy (Section 6) and the policies (Section 7) of the Area Action Plan.
The Sustainability Appraisal

4.1 The Sustainability Appraisal assesses the Area Action Plan in two ways. Firstly, an assessment of the compatibility of the Sustainability Objectives (paragraph 3.3) against the aims of the Area Action Plan has been carried out. Secondly, the strategy and policies of the Area Action Plan have been assessed against the Sustainability Objectives using the criteria and framework in paragraph 3.6.

Objectives Compatibility

<table>
<thead>
<tr>
<th>CCAAP Aims</th>
<th>Sustainability Objectives</th>
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<tbody>
<tr>
<td>PA1</td>
<td>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21</td>
</tr>
<tr>
<td>PA2</td>
<td>- - ✓ - ? - - - - - - - - - - - - - - - - - - - - - -</td>
</tr>
<tr>
<td>PA3</td>
<td>- - - - - - - - - - - ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓</td>
</tr>
<tr>
<td>PA4</td>
<td>✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓</td>
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<tr>
<td>PA5</td>
<td>- - ✓ ✓ ? ✓ - ? - - ? - ✓ - - ✓ - - - - - - - - - -</td>
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<tr>
<td>PA6</td>
<td>- ✓ - - ✓ ✓ - ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓</td>
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<tr>
<td>PA7</td>
<td>- - ✓ ✓ ✓ - ✓ - - - - - - - - - - - - - - - - - - -</td>
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<tr>
<td>PA8</td>
<td>- - ✓ ✓ ✓ ? - - - - - - - - - - - - - - - - - - - -</td>
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</tbody>
</table>

Key: ✓ positive compatibility, X possible conflict, - neutral, ? unknown

4.2 The compatibility assessment, as detailed above, demonstrates that the aims of the Area Action Plan generally perform well and are compatible with the Sustainability Objectives. In particular PA3 and PA6 perform well against a number of the objectives.

4.3 The aims of the Area Action Plan are topic related; therefore some aims have no relationship to the some Sustainability Objectives and are neutral. It is important to note that all of the sustainability objectives have at least one aim which is positively compatible with it.

4.4 Sustainability Objective 5 relates to protecting and enhancing the vitality and viability of city, town and district centres. When assessed against a number of the aims within the Area Action Plan the compatibility is recorded as ‘unknown’. This recognises the fact that though the aims of the plan are directly compatible with protecting and enhancing the vitality and viability of the City Centre; their effects on other centres will be unknown and/or uncertain. The Area Action Plan does not specifically cover other centres as the Core Spatial Strategy does.

Appraisal of strategy and policies

4.5 The assessment tables are provided within Appendix 1 of this document.

4.6 The strategy of the Area Action Plan performs generally well against the Sustainability Objectives. As expected, some aspects of the strategy perform better than others, which is to be expected. For instance, the strategy on
Public Spaces/Green Spaces and Climate Change/Sustainability perform particularly well. Generally, each strategy performs well against relevant Sustainability Objectives.

4.7 When assessed against Sustainability Objective 5 (regarding vitality and viability of city, town and district centres) the effect of a number of strategies is unknown/uncertain. This reflects the fact that the strategy is focussed directly on protecting and enhancing the vitality and viability of the City Centre and the effects on other centres will be unknown and/or uncertain. To mitigate against the unknown/uncertain effects, proposals should be in line with the adopted hierarchy of centres provided in the Core Spatial Strategy. This will ensure that the appropriate balance of development is delivered for each centre in an organised framework.

4.8 There are also a number of uncertain/unknown effects identified in relation to the strategies; however, these do not raise any overriding concerns as adverse impacts can be minimised or addressed through the application of other policies within the plan.

4.9 The policies within the plan, like the strategy, perform generally well against the Sustainability Objectives. Policies tend to perform very well against related and relevant objectives; which is to be expected. For instance Policy SS18 ‘Sustainable Design and Construction’ performs well against the Sustainability Objective 10 which relates to increasing renewable energy and energy efficiency. Likewise, Policy SS1 ‘Retail Magnets’ performs well against Sustainability Objective 4 (which seeks to enable access to the widest range of shopping services).

4.10 Policy SS17 ‘Parking’ has a number of uncertain/unknown effects as well as two recorded negative effects. These uncertain and negative effects can be mitigated and are recorded as negative due to the prescriptive nature of the Sustainability Objectives; rather than the policy being particularly unsustainable. For instance, when applied, the Sustainability Objectives do not recognise that parking provision is one element of a wider sustainable transport strategy.

4.11 Policies do not tend to perform well against Sustainability Objective 5 (regarding vitality and viability of city, town and district centres). This reflects the fact that a number of policies are focussed directly on protecting and enhancing the vitality and viability of the City Centre. As a result, their effects on other centres will be unknown and/or uncertain. Paragraph 4.7 provides details on how the unknown/uncertain effects will be mitigated.

Conclusions

4.12 The Sustainability Appraisal has demonstrated that there are no unacceptable impacts arising from the plan in terms of sustainability. There are a number of direct and positive benefits in terms social, economic and environmental sustainability which arise from the plan. For instance, the plan will provide a wide variety of services and facilities within the City Centre that are available to the entire resident population and beyond. There is no specific bias or favouritism; all needs are catered for. In addition to this the plan seeks to provide a comprehensive approach to open spaces (including public realm and green space). This will ensure that a consistent framework for delivering and providing contributions are maximised and coordinated. Finally, a strategic approach to the transport network is provided in which a number of
transport measures are proposed to ensure that the regeneration of the City Centre can be delivered.

4.13 There are a number of unknown and uncertain effects deriving from the assessment. A number of these effects are primarily a result of inflexible and prescriptive Sustainability Objectives which were created primarily for the Core Spatial Strategy. Other unknown or uncertain effects have provisions in place for mitigating their effects either through the implementation of other policies within the plan, existing regulations/legislation or through the Development Management process.

4.14 Recommendations arising from the Sustainability Appraisal will be taken forward into the next stage of the plan production. This will be recorded in the following Sustainability Appraisal of the plan.
Next Steps

5.1 This City Centre and Etruria Road Corridor Area Action Plan will be reviewed in the light of comments made at the pre-publication stage.

5.2 The revised document will then be formally published (under regulation 27 - which will also be made available for public scrutiny and comment) prior to being formally submitted to the Secretary of State (under regulation 30). Full details of the process can be found within Section 10 (Next Steps) of the plan.

5.3 It is intended that as part of the formal publication process (Regulation 27) a further Sustainability Appraisal will be conducted for the Area Action Plan. This will ensure that principles of sustainability are integrated within the plan making process and the ‘iterative’ approach is maintained.

5.4 As part of the Sustainability Appraisal for the next stage of the Area Action Plan (publication under Regulation 27) we plan to refine the process by:-

- Assessing the baseline information; to see if it is still fit for purpose;
- Assessing the identified issues (arising from the baseline information) to see if they are still relevant;
- Refreshing the Sustainability Objectives (and appraisal framework) where necessary;
- Undertaking formal scoping on the changes and approach we propose.

5.5 This will ensure that the future approach to Sustainability Appraisal is up to date; focussed specifically on Area Action Plans; more efficient and effective.

5.6 This will be undertaken prior to the Regulation 27 stage (publication). As part of this process we would welcome your comments on this report and our process for revising the Sustainability Appraisal approach.

5.7 If you have any questions on the Sustainability Appraisal please contact the Planning Policy Team on (01782) 236339.