

Screening Assessment Biddulph Neighbourhood Plan - Strategic
Environmental Assessment

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Introduction

1 Introduction

1.1 Biddulph Town Council has prepared a draft Neighbourhood Plan setting out a vision and proposals for the future of the town that reflect the needs and wishes of the community. In preparing a draft Plan, Biddulph Town Council has carried out comprehensive community consultation, helping to identify key priorities for the Neighbourhood Plan to address. Consideration of feedback from community consultation has informed the preparation of a number of planning policies and proposals set out in the draft Plan.

1.2 Following determination as to whether Strategic Environmental Assessment of the draft Plan is required, the Neighbourhood Plan will be subject to a period of "pre-submission" public consultation. Following this consultation, the Town Council will prepare to submit the draft Neighbourhood Plan to the District Council in order that it might proceed to independent Examination and subsequent Referendum.

1.3 Only a draft Neighbourhood Plan or Order that meets each of a set of basic conditions can be put to a referendum and be "made" (adopted). The basic conditions are set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990.

1.4 The District Council will need to be satisfied that the basic conditions have been met. A Neighbourhood Plan or Order must:

- have regard to national policy and guidance;
- have special regard to listed buildings (this applies only to Orders);
- have special regard to conservation areas (this also applies only to Orders);
- contribute to sustainable development;
- be in general conformity with strategic policies in the development plan;
- not breach EU obligations.
- comply with other prescribed matters.⁽¹⁾

1.5 Biddulph Town Council will be required to prepare a Basic Conditions Statement alongside the submitted Plan, in order to demonstrate how the Plan meets the basic conditions set out above.

¹ Regulations 32 and 33 of the Neighbourhood Planning (General) Regulations 2012 (as amended) prescribe 2 basic conditions in addition to those set out in the primary legislation. These are (1) that the making of a Neighbourhood Plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017; and (2) having regard to all material considerations, it is appropriate that a Neighbourhood Development Order is made where the development described in an Order is Environmental Impact Assessment development.

Legislative background

2 Legislative background

2.1 A Neighbourhood Plan or Order must be compatible with European Union obligations, as incorporated into UK law, in order to be legally compliant. A key directive of relevance to neighbourhood planning is Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (often referred to as the Strategic Environmental Assessment {or SEA} Directive).

2.2 The District Council has prepared this screening assessment to help determine whether the policies and proposals set out in the draft Biddulph Neighbourhood Plan will require a Strategic Environmental Assessment (SEA) in accordance with the European Directive 2001/42/EC and associated Environmental Assessment of Plans and Programmes Regulations 2004.

2.3 The Environmental Assessment of Plans and Programmes Regulations 2004 explain the process to be followed in undertaking a Strategic Environmental Assessment in respect of plans and programmes. They implement the European Directive and require an SEA to be undertaken on any land use plan or programme "which sets the framework for future development consent of projects".

2.4 A strategic environmental assessment is unlikely to be required where a planning document deals only with a small area at a local level (regulation 5(6) of the Environmental Assessment of Plans and Programmes Regulations 2004), unless it is considered that there are likely to be significant environmental effects. Screening is used to determine whether significant environmental effects are likely.

2.5 The National Planning Practice Guidance offers further guidance on when an SEA may be required for a Neighbourhood Plan⁽²⁾. SEA is more likely to be necessary if:

- a neighbourhood plan allocates sites for development (for example for housing or employment) that have not already been appraised through the Sustainability Appraisal of the Local Plan;
- the neighbourhood plan area contains sensitive environmental assets that may be affected by the policies and proposals in the neighbourhood plan;
- the neighbourhood plan is likely to have significant environmental effects not already addressed through the sustainability appraisal of the Local Plan.

2.6 When determining whether a neighbourhood plan requires SEA, the SEA Regulations require that the criteria set out in Schedule 1 of the SEA Regulations be considered. These are the criteria for determining the likely significance of effects on the environment. The criteria are split into two categories: those relating to the characteristics of the plan and those to the characteristics of the effects and area likely to be affected.

2.7 The results of the screening process must be detailed in a Screening Statement, available to the public and the findings must be subject to consultation with Historic England, the Environment Agency and Natural England.

2.8 Neighbourhood Planning (General) (Amendment) Regulations 2015 require submission either of a statement of reasons as to why SEA was not required, or an environmental report (a key output of the SEA process) to accompany a Neighbourhood Plan when it is submitted to the local planning authority.

2 Paragraph: 046 Reference ID: 11-046-20150209

2.9 Providing there are no significant changes to the proposals and the policies of the current draft Neighbourhood Plan, this screening assessment undertaken by Staffordshire Moorlands District Council helps fulfil this requirement to accompany submission of the Neighbourhood Plan.

The draft Biddulph Neighbourhood Plan

3 The draft Biddulph Neighbourhood Plan

Planning Context

National

3.1 Paragraph 29 of the National Planning Policy Framework (February 2019) clarifies that neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan. Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies.

Local

3.2 The Staffordshire Moorlands Local Plan was submitted for examination on 28th June 2018. The emerging Local Plan has been subject to Sustainability Appraisal and Habitats Regulations Assessment. The Plan and its assessments can be seen at:

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

Neighbourhood Plan

3.3 The parish of Biddulph was designated as a Neighbourhood Area on 16th February 2016.

3.4 Biddulph Town Council is preparing both a Neighbourhood Development Plan and a Neighbourhood Development Order. The draft Neighbourhood Development Order has been subjected to screening alongside the Neighbourhood Development Plan.

3.5 A range of consultation events have taken place to support preparation of the Neighbourhood Plan. Members of the neighbourhood planning team have attended meetings of Residents Associations, meetings with young people, health groups, and other local organisations. A householder questionnaire was circulated in December 2017 and completed forms were returned by over 1,200 households in the town.

3.6 Biddulph Town Council has received specialist support from AECOM to develop a Housing Needs Assessment. AECOM has also completed a Masterplan for the town centre. At the end of 2018, the Neighbourhood Plan Working Group consulted the community on proposed Local Green Space designations.

Plan Vision and Aims

3.7 The draft Neighbourhood Plan sets out the following vision:

The Garden Town of Staffordshire is recognised as such by all who live in, work in or visit our parish. It is seen to have a rich history and positive future where the wellbeing and prosperity of all is nurtured and valued. Development is planned for the benefit of the community; particularly in terms of design, infrastructure, sustainability and green spaces.

3.8 The vision is supported by the following aims:

1. Protect the rural setting and character, promoting the 'Garden Town of Staffordshire'.
2. Identifying all local heritage structures or monuments, understanding their history, our culture and encouraging tourism responsibly.
3. Promoting the local economy, aiming for prosperity for all.
4. Holding the well-being of our community at our core.
5. Understanding our housing need and encouraging creative and thoughtful sustainable design.
6. Improving our infrastructure where required.
7. Caring and enhancing the natural environment, countryside, Green Belt and open spaces ensuring that habitats and wildlife thrive.

3.9 The draft Plan does not make any development site allocations. However it proposes to designate a number of Local Green Spaces.

3.10 The draft Plan includes seventeen policies:

- HCT1: Enterprise and Tourism Development
- LE1: Biddulph Town Centre
- LE2: Mills Triangle Policy Area
- CF1: New Community Facilities
- CF2: Existing Community Facilities
- NE1: Natural Environment Features
- NE2: Urban Edge
- NE3: Local Green Space
- NE4: Biddulph Valley Way
- NE5: Protection of Views of Local Importance
- HOU1: Affordable Housing Delivery
- HOU2: Infill Housing
- INF1: Critical Road Junctions
- INF2: Sustainable Drainage
- INF3: Community Infrastructure
- DES1: Design
- DES2: Public Realm, Car Parking and Movement

3.11 An enterprise and tourism policy is proposed to support the reuse of existing buildings for enterprise and tourism in order to help diversify the rural economy.

3.12 Town centre policies seek to encourage a diverse range of uses to create a sustainable town centre with re-use of the Mills Triangle area supported. New community facilities are encouraged, in particular those that meet an identified need such as activities for teenagers and facilities for elderly people. There is also support for the retention of existing facilities in the Plan Area.

3.13 A number of Natural Environment policies together seek to maintain and support the natural environment, with opportunities identified to enhance wildlife diversity and support natural habitats and assets.

3.14 Housing policies aim to inform future housing delivery to ensure that it is supported in sustainable locations and benefits the existing and new communities of the parish.

3.15 Infrastructure policies are proposed to address key priorities identified through community engagement:

- issues surrounding flooding and water management;
- pinch points in the highway network;
- the current ability or lack of capacity for the current highway network to function before any new development is proposed; and
- communications, including access to super-fast broadband and telecommunications.

3.16 Design policies DES1 and DES2 interpret National Planning Policy Framework guidance that neighbourhood plans should develop robust and comprehensive policies that set out the quality of development that will be expected for the area.

Assessment

4 Assessment

Methodology

4.1 To decide whether a draft neighbourhood plan might have significant environmental effects, its potential scope should be assessed at an early stage against the criteria set out in Schedule 1 to the Environmental Assessment of Plans and Programmes Regulations 2004. (These regulations implement the Strategic Environmental Assessment Directive in England.)

4.2 The criteria set out Schedule 1 of the Regulations are shown in the table below, alongside an assessment finding in relation to the draft Biddulph Neighbourhood Plan.

Assessment

Significance Criteria set out in SEA Directive (Annex ii) and Schedule 1 of Environmental Assessment of Plans and Programmes Regulations 2004	Impact of the draft Biddulph Neighbourhood Plan
1. The characteristics of plans and programmes, having regard, in particular, to:	
(a) the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;	The Neighbourhood Plan would, if adopted, form part of the Statutory Development Plan and as such does contribute to the framework for future development consent of projects. However, the Plan sits within the wider framework set by the National Planning Policy Framework, the emerging Local Plan and adopted Core Strategy policies. In addition, the projects for which this Plan helps to set a framework are local in nature and have limited resource implications. The Plan vision and aims are set out in Section 3 of this report.
(b) the degree to which the plan or programme influences other plans and programmes including those in a hierarchy;	The Neighbourhood Plan is considered to be in general conformity with the National Planning Policy Framework. The policies within the document conform with the Core Strategy Policies and complement the Council's emerging strategic policies. The Neighbourhood Plan is unlikely to influence other Plans or Programmes within the Statutory Development Plan.
(c) the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;	The Neighbourhood Plan will work to protect and enhance the natural environment of the Parish of Biddulph and ensure that natural resources are used prudently. The draft Plan protects a number of areas through designation as Local Green Space. The draft Plan does not make development site allocations. However the Plan supports growth across the Neighbourhood Area concentrated on the development of strategic sites identified in the emerging SMDC Local Plan and appropriate infill. The Plan promotes the

Significance Criteria set out in SEA Directive (Annex ii) and Schedule 1 of Environmental Assessment of Plans and Programmes Regulations 2004	Impact of the draft Biddulph Neighbourhood Plan
	<p>re-use of existing buildings, particularly those in Biddulph town centre. The Plan supports the delivery of strategic policies in the emerging Local Plan and aims to support the delivery of sustainable growth through policies on tourism, the local economy, infrastructure, community facilities, natural environment, housing and design. It is therefore considered that the Neighbourhood Plan will promote sustainable development.</p>
(d) environmental problems relevant to the plan or programme; and	<p>Biddulph is a former mining town that lies in the north west of the Staffordshire Moorlands district. It is the second largest settlement in the District with a population of 19,892 (including Biddulph Moor). The town has suffered from economic decline and includes the Biddulph East area, a former coal board housing estate that experiences a range of socio-economic and environmental deprivation problems. The building of a town centre by-pass has opened up opportunities for new development and regeneration. There are opportunities to strengthen and promote links between the town and countryside, in particular linking to and from the Biddulph Valley Way and Biddulph Grange Garden and Country Park. The Biddulph Valley Way is a key part of the Green Infrastructure network for the town, comprising 4.5 miles of surfaced path along a disused railway to the west of the town. It is suitable for walkers, cyclists and horse riders. The Way provides access directly or visually to areas with historical and natural history interest. The Whitemoor Local Nature Reserve at the northern end of the Biddulph Valley Way is a Staffordshire Site of Biological Importance due to its woodland wildlife. Biddulph is also home to the celebrated Biddulph Grange Gardens, the best surviving example of an ornamental Victorian garden. Environmental concerns relevant to the Plan include loss of countryside and biodiversity through development and impacts on air quality and climate change associated with growth. The Neighbourhood Plan will help to address all these issues in a positive manner.</p>
(e) the relevance of the plan or programme for the implementation of Community	<p>The Neighbourhood Plan is not proposing development specifically related to waste management or water management.</p>

Significance Criteria set out in SEA Directive (Annex ii) and Schedule 1 of Environmental Assessment of Plans and Programmes Regulations 2004	Impact of the draft Biddulph Neighbourhood Plan
legislation on the environment (for example, plans and programmes linked to waste management or water protection).	
2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:	
(a) the probability, duration, frequency and reversibility of the effects;	The Neighbourhood Plan is likely to have modest but enduring positive environmental effects achieved in particular through policies for design criteria and the protection of natural environment features, biodiversity, local green spaces and the Biddulph Valley Way. Policies on the reuse of existing buildings and critical road junctions are designed to bring modest positive effects in relation to natural resources and air quality.
(b) the cumulative nature of the effects;	It is intended that the environmental effects will have positive, cumulative benefits for the area, for example through protection of natural environment features and the designation of local green spaces.
(c) the transboundary nature of the effects;	There are no transboundary issues across member states. Any effects on adjoining Staffordshire Moorlands parishes are likely to be positive. For example through protection of natural environment features, biodiversity and the Biddulph Valley Way and through support for community infrastructure.
(d) the risks to human health or the environment (for example, due to accidents);	No significant risks to human health or the environment have been identified. The Plan is likely to improve human health by improving access to green spaces and the countryside.
(e) the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);	The Neighbourhood Plan relates to the Parish of Biddulph which includes the market town of Biddulph and the village of Biddulph Moor with a combined population of around 19,892 people. The magnitude and spatial extent of the effects are therefore comparatively small.
(f) the value and vulnerability of the area likely to be affected due to:	The Neighbourhood Plan includes sites of environmental and heritage importance. There are 65 heritage assets recorded for Biddulph on the National Heritage List for England. The most significant include

Significance Criteria set out in SEA Directive (Annex ii) and Schedule 1 of Environmental Assessment of Plans and Programmes Regulations 2004	Impact of the draft Biddulph Neighbourhood Plan
<p>(i) special natural characteristics or cultural heritage;</p> <p>(ii) exceeded environmental quality standards or limit values; or</p> <p>(iii) intensive land-use; and</p>	<p>Biddulph Grange and Gardens; Church of St Lawrence; and Knypersley Hall. The West Midlands Heritage at Risk Register 2018 records two buildings at risk in Biddulph: Biddulph Old Hall (Scheduled Monument); and Prospect Tower and attached wing, Knypersley (grade II* listed building). The Plan Area includes the Biddulph Valley Way (Whitemoor) Local Nature Reserve. The north of the Way provides access to Whitemore Wood with its diverse springtime flora and Bailey's Bank Wood which contains the remains of the medieval Biddulph Castle. The ancient and semi-natural woodlands contained within Greenway Bank Country Park provide further important habitats. Biddulph Grange Country Park is a 73 acre site originally part of the larger Biddulph Grange Estate. The site includes woodland, meadows, a large lake and ponds. Biddulph Brook and its associated catchment drains the area around Biddulph, ultimately draining to the River Dane east of Congleton. Key elements of the District's Green Infrastructure network within the Plan Area are the Staffordshire Way (Gritstone Trail) and the Biddulph Valley Way. The emerging Staffordshire Moorlands Local Plan and adopted Core Strategy include policies for the protection of landscape character, biodiversity and the built and historic environment and the Neighbourhood Plan will reinforce these policies with no expected adverse effects.</p>
<p>(g) the effects on areas or landscapes which have a recognised national, Community or international protection status.</p>	<p>There are no SSSIs within the Neighbourhood Plan Area, however the Area includes the Biddulph Valley Way (Whitemoor) Local Nature Reserve. The Plan Area is 10km beyond the 2km zone of influence around the Peak District Moors (South Pennine Moors Phase 1) Special Protection Area and similarly 10km beyond the 500m zone around the Peak District Dales and South Pennine Moors Special Areas of Conservation. The emerging Staffordshire Moorlands Local Plan and adopted Core Strategy include policies for the protection of landscape character, the natural environment and sites of European importance and the Neighbourhood Plan will reinforce these policies with no expected adverse effects.</p>

Table 4.1 Determination of the likely significance of environmental effects

Conclusions

5 Conclusions

5.1 Having taken into account the:

- Findings of the integrated SEA / SA of the emerging SMDC Local Plan.
- Findings of the assessment set out in section 4.

5.2 It is considered that the Biddulph Neighbourhood Plan is unlikely to lead to any significant environmental effects beyond those already assessed through the environmental assessments (SEA/SA and HRA) of the emerging SMDC Local Plan. In line with regulation 9 of the Environmental Assessment of Plans and Programmes Regulations 2004, it is therefore considered that no further environmental assessment is required.

5.3 If the scope of the Neighbourhood Plan subsequently changes, the LPA reserves the right to reassess this screening opinion.

Consultation

6 Consultation

6.1 Prior to a determination being made, this screening report has been sent to the relevant statutory consultation bodies to seek their opinion.

6.2 The SEA consultation bodies are the Environment Agency, Natural England and Historic England.

6.3 The screening opinions of the three consultees have been added to this screening report before a statement of reasons for the determination is prepared and published.

Date: 22 July 2019
Our ref: 289316
Your ref: Biddulph SEA and HRA Screening



Joanna Bagnall
Regeneration Service

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T 0300 060 3900

Dear Ms Bagnall,

SEA and HRA Screening:
Draft Biddulph Neighbourhood Plan
Draft Neighbourhood Development Order – Biddulph Town Centre

Thank you for your consultation on the above dated 4th July 2019 which was received by Natural England on the same day.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Strategic Environmental Assessment Screening

We welcome the production of the SEA Screening reports. Natural England notes and concurs with the screening outcome of both the Neighbourhood plan and the Neighbourhood Development Order that significant effects on the environment are considered to be unlikely to occur. Therefore no further environmental assessment is required.

Further guidance on deciding whether the proposals are likely to have significant environmental effects and the requirements for consulting Natural England on SEA are set out in the [National Planning Practice Guidance](#).

Habitats Regulations Assessment Screening

Natural England welcomes the consideration given to the Habitats Regulations. We are satisfied that the conclusion of the Local Planning Authority (as competent authority) that there are no likely significant effects on European sites is appropriate, and therefore advise that further Habitats Regulations Assessment is not required for both the Neighbourhood Plan and the Neighbourhood Development Order.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely

Victoria Kirkham
Consultations Team



Historic England

Ms Joanna Bagnall
Staffordshire Moorlands District Council

Direct Dial: 0121 625 6887

Our ref: PL00599742
22 July 2019

Dear Ms Bagnall

BIDDULPH NEIGHBOURHOOD PLAN- SEA AND HRA SCREENING

Thank you for your consultation and the invitation to comment on the SEA and HRA Screening Document for the above Neighbourhood Plan.

For the purposes of consultations on SEA Screening Opinions, Historic England confines its advice to the question, "Is it likely to have a significant effect on the environment?" in respect of our area of concern, cultural heritage.

Our comments are based on the information supplied with the screening request. On the basis of the information supplied and in the context of the criteria set out in Schedule 1 of the Environmental Assessment Regulations [Annex II of the 'SEA' Directive], Historic England concurs with your view that the preparation of a Strategic Environmental Assessment is not required.

Regarding HRA Historic England does not disagree with your conclusions but would defer to the opinions of the other statutory consultees.

The views of the other statutory consultation bodies should be taken into account before the overall decision on the need for a SEA is made. If a decision is made to undertake a SEA, please note that Historic England has published guidance on Sustainability Appraisal / Strategic Environmental Assessment and the Historic Environment that is relevant to both local and neighbourhood planning and available at: <https://www.historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/>

I trust the above comments will be of help in taking forward the Neighbourhood Plan.

Yours sincerely,

Peter Boland
Historic Places Advisor
peter.boland@HistoricEngland.org.uk

cc:



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Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by the organisation can be requested for release under this legislation.

Joanna Bagnall
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Moorlands House
Stockwell Street
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Staffordshire
ST13 6HQ

Our ref: UT/2006/000312/SE-
03/SC1-L01
Your ref: Biddulph
Date: 12 September 2019

Dear Madam

Biddulph Neighbourhood Development Plan SEA and HRA Screening

Thank you for referring the above Neighbourhood Development Plan for comment. We apologise for the delay in our response and hope the following comments will still be taken into account.

As requested we have reviewed the Screening Assessment prepared in support of the Biddulph Neighbourhood Plan. Having reviewed the proposals we do not consider there to be significant environmental impacts as a result of this plan, therefore we concur with the conclusions of the report and do not require a SEA or HRA to be undertaken in support of the plan. We advise however the consultation is undertaken with Natural England amongst other statutory bodies prior to making any final decision.

We note the presence of floodplain from the Biddulph Brook and historical landfill sites within the Neighbourhood Plan boundary, however as this does not affect the settlement boundary we have no concerns. However, we recommend the following amendments in the Biddulph Neighbourhood Development Plan Draft Policies, dated April 2019:

Natural Environment

The NDP does not include any policies which refer to fluvial flood risk and we would strongly recommend including a policy for flood risk, which includes climate change and surface water drainage.

All proposals for new development must demonstrate that existing flood risk will not be increased elsewhere (downstream), ideally by managing surface water on site and limiting runoff to the greenfield rate or better.

We recommend Policy NE1 to include “watercourses and its floodplains” (bullet point 2).

Environment Agency
9, Sentinel House Wellington Crescent, Fradley Park, Lichfield, WS13 8RR.
Customer services line: 03708 506 506
www.gov.uk/environment-agency
Cont/d..

Please note, the maps shown on Page 25 are not the "Extent of flooding", but the "Areas at risk from"... (1. surface water flooding, 2. river flooding).

Infrastructure

New developments should seek to control and discharge all surface water runoff generated on site during the 1 in 100 year plus climate change rainfall event. For Greenfield development sites, the surface water runoff generated as a result of the development should not exceed the Greenfield runoff rate. For Brownfield development sites, developers are expected to deliver a substantial reduction in the existing runoff rate, and where possible, reduce the runoff to the equivalent Greenfield rate.

We recommend Policy INF2 or INF3 is amended to include the following wording: surface water discharge should not exceed the Greenfield runoff rate (as described above).

"In accordance with the Defra 2015 non technical standards and/or Staffordshire Lead Local Flood Authority (LLFA) SuDS handbook requirements, and/or Local Plan policy surface water 'Greenfield' run-off rate requirements whichever is in force and more onerous at the time of the development."

See the following link for more information on the Staffordshire Lead Local Flood Authority (LLFA) SuDS handbook and other matters the LLFA has Authority over <https://www.staffordshire.gov.uk/environment/Flood-Risk-Management/Information-for-Planners-and-Developers.aspx>

Additional Comments

In addition to the comments above, we note the Water Framework Directive (WFD) and objectives from the Humber and North West River Basin Management Plan have not been included.

If you have any queries contact me on the details below.

Yours faithfully

Ms Anne-Marie McLaughlin
Senior Planning Advisor

Direct dial 020 3025 4111
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End

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