



Staffordshire
Waste Partnership

Environmental Assessment Appraisal Report

**2013 Refresh of the Joint Municipal Waste
Management Strategy for Staffordshire &
Stoke-on-Trent (2007 - 2020)**

From **zero waste** to landfill...
...towards a **resourceful economy**



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Executive Summary

The 2013 refresh of the Joint Municipal Waste Management Strategy for Staffordshire and Stoke-On-Trent (2007-2020) will not be subject to a Strategic Environmental Assessment because;

- As the refreshed strategy follows the same principles / values as the original strategy (2007) it can be considered to be a minor modification of the 2007 strategy, and unlikely to have any significant environmental effects. As such, under Article 3.3 of Directive 2001/42/EC, an SEA is not required.
- A screening process has concluded that the 2013 refreshed strategy has no significant or likely environmental impacts.
- Further assessments will be carried out in the future where larger projects are judged to have the potential to produce environmental effects.

1. Introduction

Written in 2007, the 'Integrated Municipal Waste Management Strategy for Staffordshire and Stoke-on-Trent' provided a framework for the management of waste to 2020. A full Strategic Environmental Assessment (SEA) was conducted to assess the environmental impacts of the 2007 strategy. Following the achievement of the key targets ahead of the 2020 deadline, a refreshed strategy has been produced to provide a revised framework based upon the same principles, to lead Staffordshire Waste Partnership to 2020.

The following report details the process undertaken in order to determine the requirement to conduct a full SEA for the 2013 refreshed strategy, given the nature of the document and legal requirements under European Directive 2001/42/EC (Strategic Environmental Assessment).

It is recommended that this report is read in conjunction with the 2007 strategy (and associated full SEA report) and 2013 refreshed strategy.

1.1 Background

1.1.1 2007 Joint Municipal Waste Management Strategy

The 'Integrated Municipal Waste Management Strategy for Staffordshire and Stoke-on-Trent' was originally produced in November 2003 and updated 2007. This strategy focused upon the following principles;

- Increased household recycling: Delivering on a combined household recycling and composting target of 55% (equivalent to 50% of all MSW) by 2015,
- Recovering benefit from all remaining MSW: Sending approximately 50% of all MSW for recovery by 2020,
- Zero waste to Landfill: Minimising all forms of waste to landfill through increased recycling followed by maximum recovery of all remaining residual waste, thus placing landfill as the last and final option.

The document's wider remit had the intention of;

- Achieving sustainable management of all waste arisings through emphasis on waste reduction, re-use, recycling and recovery,
- Managing waste as a resource, as close as possible to its point of origin,
- Developing effective co-operation and joint working between local authorities, businesses and residents on the benefits of waste minimisation and increased recycling and recovery.

1.1.2 2013 refreshed strategy

The 2013 refresh of the Joint Municipal Waste Management Strategy is an update to the 2007 full strategic plan, addressing the management of municipal solid waste within Staffordshire and Stoke-on-Trent to the year 2020. It has been prepared by Staffordshire Waste Partnership (SWP), which comprises Staffordshire County Council, Stoke-on-Trent City Council, and the eight Staffordshire District/Borough Councils.

In 2012, all councils achieved 50% recycling performance. It is expected that the partnership will achieve 55% recycling performance, as a result of the opening of a new Energy from Waste plant in 2014 increasing our landfill diversion figures. In meeting these targets and adopting the other key aspects of the strategy ahead of the 2020 deadline, new targets were required. In addition, the 2007 strategy no longer effectively incorporates the strategies and policies adopted by individual authorities within SWP, requiring the balance to be addressed more effectively. Driven by these advancements and the changing landscape of key legislative and economic drivers, there was a clear need to refresh the strategy.

The 2013 refreshed strategy has developed six key principles based upon the targets set out in the 2007 strategy. These principles form the core objectives for the strategic implementation via the projects in the delivery plan. The principles and corresponding objectives are listed below in no particular order and have not been prioritised;

- **Waste prevention**, including reuse; To maintain zero waste to landfill and reduce the amount of local authority collected municipal and commercial residual produced in Staffordshire, benchmarked against the top 10% of residents, thus reducing the overall volume of waste that is treated, recovered, disposed, or recycled.
- **Efficiency Savings**; To achieve efficiency savings across SWP, thus reducing the total budget for waste management below the rate of inflation.
- **Resource Recovery**; To ensure the maximisation of resource value from collected materials, as a commodity or as energy provision.
- **Carbon Reduction**; To reduce the total carbon emissions for waste collection, processing and disposal activities 2% year on year, by ensuring consideration in future contract, infrastructure and procurement decisions.
- **Infrastructure & Contracts**; To provide and support appropriate infrastructure with suitable contracts that ensure value for money, by developing procurement policies to maximise efficiency & sustainability.
- **Municipal Waste**; To provide efficient and cost effective waste services to local residents and businesses.

It should be noted that at this stage, there are no plans to undertake any building of waste management infrastructure, and therefore there is no options appraisal to assess for environmental impacts.

1.2 Current Waste Management Position

In recent years, each of the eight WCAs has achieved above 50% recycling performance (total recycling including composting), coupled with a reduction in the volume of waste produced.

In Staffordshire, the following waste management services are currently in operation;

- All eight WCA's and Stoke on Trent UA operate household waste and recycling collections, including bulky waste collections and free garden waste collections. Services are delivered through a mixture of 'in-house' and contracted out services.
- 16 Household Waste Recycling Centres (HWRCs) are operated by Staffordshire County Council and Stoke on Trent UA.
- Over 300 bring banks, offering recycling facilities.

Through a mixture of joint arrangements and individual contracts, SWP utilises the following technologies as waste treatment, reprocessing or disposal options other than landfill;

- three in-vessel composting plants (for garden waste),
- one Anaerobic Digestion (AD) plant (for organic waste involving food),
- three dry recycling Material Recovery Facilities (MRFs),
- three waste transfer stations,
- two Energy from Waste Plants (for residual waste),
- street sweepings reprocessing facility.

Predicated waste growth suggests that, by 2027, not including expected population growth and associated increased housing numbers, on a like for like basis;

- overall waste arisings will increase by approximately 4%,
- collected residual waste will decrease by circa 25,000 tonnes,
- collected recycling will increase by approximately 50,000 tonnes.

A full review of the current waste management position can be found in the refreshed strategy.

2. Review of the 2007 Strategic Environmental Assessment

A full Strategic Environmental Assessment (SEA) was carried out in 2007 to assess the impacts of the strategy on the environment. It is recommended that the full SEA and associated documents are read in conjunction to this report.

The Environmental Report of the SEA assessed the effects on the environment of the two key aspects of the 2007 strategy; the objectives and policy requirements of the 2007 strategy, and implementing the waste strategy options. This was achieved through assessment against the SEA appraisal criteria, which included the following key environmental issues;

- Population and human health,
- Biodiversity and flora / fauna,
- Material assets,
- Soil, water, and air,
- Climatic factors,
- Cultural heritage and landscape.

The SEA process involves checking that the strategy objectives are concurrent with the chosen relevant Sustainable Development Objectives (chosen in the SEA's Scoping Report, based on a variety of national and local policy and planning documents). When compared and scored for any impacts, the overall conclusion was very positive. Given the strategic level of the objectives, it was decided that a more specific or quantitative assessment is difficult to conduct.

The options appraisal of the 2007 strategy provided several long term management options for the County's municipal solid waste, based upon a three step process of minimisation, recycling / composting and residual treatment. The SEA concluded that the improvement of waste minimisation and recycling are an improvement to the baseline of doing nothing and therefore consistent with the relevant Sustainable Development Objectives. The proposed recycling and composting targets were assessed and indicated mainly positive impacts. The only negative impacts were deemed negligible, and were vastly offset by major positive impacts associated with increased recycling and overall reduction of waste to landfill. The options considered for residual treatment were each assessed against the 21 sustainability indicators, based upon quantitative life cycle assessment. The 5 technologies considered all had an overall positive impact when compared to the baseline of sending waste to landfill. Of the 5 technologies considered, a new EfW plant was chosen as the most suitable option. The plant, known as Four Ashes and located in South Staffordshire, is currently under construction and is expected to be fully operational in 2014. It is expected that participation in this recovery method will divert waste from landfill disposal. The aim is to reduce the volume of waste to landfill disposal to less than 5% of total waste arisings.

3. Review of 2007 SEA against the 2013 refreshed strategy

The principles of the 2013 refresh of the Joint Municipal Waste Management Strategy are based upon the main principles of the 2007 strategy. The 2013 refreshed strategy focuses primarily upon waste minimisation (including reuse) and recycling / composting, which are two of the main steps in the 2007 strategy. The only major difference between the two strategies is the loss of residual treatment options for consideration in the 2013 refresh, meaning no full options appraisal is required with a full assessment of such works. Although the specifics of the project work to be undertaken to deliver the specific objectives under the six key principles differ, in order to move forward with necessary tasks to progress waste management issues, the values of reducing waste and increasing recycling remain the same. The key principles and core objectives go into more detail on these issues, however all have the same aim to ensure a sustainable approach to waste management.

According to the guidance on the SEA directive, an SEA is not required to be undertaken on any document which is a 'minor modification' on an already established document with a full SEA. The 2013 refreshed strategy is an update of the original strategy written in 2007, which had a full SEA undertaken during strategic planning of the document. The 2013 refreshed strategy is a response to the need for an updated strategic plan as the targets set in the 2007 strategy have been met ahead of the 2020 schedule. The 2013 refreshed strategy provides a strategic plan to take the Partnership up to 2020, based upon the same principles and values as the original strategy. In order to avoid the same situation of meeting targets ahead of schedule, the 2013 refreshed strategy provides core objectives to provide guidelines for future working, instead of specific targets.

Given the strong alignment between the principles and values of the 2007 strategy and the 2013 refreshed strategy, it seems reasonable to consider that the 2013 refreshed strategy represents a minor modification of a plan or programme that would normally require an SEA. Article 3.3 of the "SEA Directive", therefore only requires a full SEA if the revised plan is considered likely to have significant environmental effects.

To ensure that the environmental impacts of the refreshed strategy are fully considered, section 4 undertakes a short environmental assessment of the key principles / core objectives of the refreshed strategy against the Strategic Development Objectives.

4. Environmental Assessment of the 2013 refreshed strategy

A short environmental assessment of the core objectives of the refreshed strategy against the Strategic Development Objectives has been undertaken to consider the environmental impacts. Considering that both strategies share the same principles, it is assumed that the same assessment methodology remains applicable [against a baseline of 'doing nothing'].

However, to fully broach the uncertainty when trying to assess objectives at such a high level in a strategy document, the methodology has been modified to include a scoring mechanism for 'uncertain impacts'. The environmental assessment table [appendix 1] shows the use of question marks to highlights areas of uncertainty; however it should be noted that this uncertainty falls only at this stage of the strategic implementation. In a strategy, wording is necessarily loose and individual themes can be assessed out of context, with details of delivery being impossible to know at the strategy stage. The question marks in the table are used to draw attention to areas where the detail of implementation can indicate potential opportunities for uncertain impacts to be turned into positives. Such uncertainty is mainly confined to carbon reduction, as there are a range of different technologies to reach the goals of our objective, therefore the impacts depend on the delivery of the project, which have not yet been determined. It is therefore a requirement that further investigation is undertaken during the project deliverables of the strategic objectives – an SEA will be undertaken on specific projects.

Although there are further uncertainties in the table, these are limited to uncertainty between the impacts being positive and neutral. It can be safely determined that the impact will not be negative, as regulatory systems and legislation ensure that negative outcomes will not arise. Therefore, whilst unsure of the impact at this stage due to project delivery uncertainty, it can be concluded the no negative impacts will occur when legally compliant.

The assessment has been conducted based upon the following observations, in the absence of quantitative assessment scores;

- Building upon the zero waste to landfill and increased recycling rates targets of the 2007 strategy, any reduction in waste sent to landfill (via waste minimisation, improved recycling / composting services / processing, or use of alternative technologies such as Energy from Waste) reduces the adverse impacts of public amenity on nature, such as soil, air and water by reducing associated pollution (as also stated previously in the original SEA).
- Proposed efforts to decrease the volume of waste produced, increase recycling and optimise resource recovery will serve to minimise the consumption of finite resources, with potential to trade items as commodities or recover energy.
- Any efficiency savings and improved infrastructure offer potential carbon reduction opportunities if managed correctly. Efforts to reduce carbon emissions in the management of waste is likely to have an overall positive effect on an otherwise industrial process (depending on the technologies and the location of the facilities), and shows ongoing consideration to environmental impacts of all aspects of waste management.
- There is an element of uncertainty when considering the refreshed strategy objectives, given that the exact nature of the projects to deliver the objectives will develop over the next 7 years that the strategy covers. Therefore, where appropriate, assessments will be carried out to explore the potential impacts of different approaches to key projects in the delivery plan, using a process similar to the SEA. The scale and detail of the assessments will depend on the size and significance of the project, as well as the potential environmental effects.

This assessment concludes that the overall impacts of the 2013 refreshed strategy are very positive, with no incompatibilities emerging from the strategy compared with the key criteria. The key principles and associated core objectives of the 2013 refreshed strategy are in line with the SEA objectives.

5. Considering the Effects on the Environment

Our determination regarding the likely significance of effects on the environment of the 2013 refreshed Joint Municipal Waste Management Strategy (2007 – 2020) are set out in the below table.

Overall impacts of the strategy	
Criteria	Assessment
The degree to which the strategy sets a framework for projects and other activities, with regard to either the location / nature / size / operating conditions or by allocating resources.	<p>The strategy has a delivery plan which details board projects to be implemented where appropriate via external contracts which may involve possible infrastructure developments, depending on the contractor's existing facilities / services.</p> <p>The strategy is supplementary to the Waste Local Plan (2010-2026), and Waste Prevention Strategy.</p>
The degree to which the strategy influences others plans and programmes.	<p>The strategy sets a framework for waste management contracts within the context of the Waste Local Plan (2010).</p> <p>The scope of the strategy will also provide additional direction to individual council policies.</p>
The relevance of the strategy for the integration of environmental considerations, in particular with a view to promoting sustainable development.	The strategy considers the environment in the core objectives, by aiming to improve local waste management to focus higher up the waste hierarchy, which have the least environmental impact. The delivery plan will put the strategy's framework into affect.
Environmental problems relevant to the strategy.	<p>No environmental problems are expected, given that the strategy aims to reduce any potential environmental impacts of waste management (such as carbon emissions).</p> <p>The Waste Local Plan (2010) has already identified suitable areas for potential development that create no / limited environmental impact.</p>
The relevance of the strategy for the implementation of European Community legislation on the environment.	The strategy is written in accordance will all current legislation.
Probability, duration, frequency and reversibility of the effects	The strategy does not pose significant risk to the environment. However individual assessment of specific projects can address any potential risks.
Cumulative nature of the effects	Likely cumulative nature of the effects is considered to be minimal. Such any development go ahead, such effects will be checked accordingly in the detailed planning control process.

Characteristics of the refreshed strategy's effects and the area likely to be affected	
Criteria	Assessment
Trans-boundary nature of the effects	There are no trans-boundary effects due to the scope of the strategy and its geographical coverage. However the strategy recognises that waste travels outside the county but such activity is planned for and the effects considered in detailed assessments.
Risks to human health / the environment	There is considered to be limited significant or likely risks to human health and the environment. The nature of the strategy includes the potential for industry based activities, however these risks are considered to have been properly assessed, managed and mitigated against.
Magnitude and spatial extent of the effects	The strategy is specific to the county area and its population. However waste travels outside the county but such activity is planned for and the effects considered in detailed assessments.
Value and vulnerability of the area likely to be affected, due to; <ul style="list-style-type: none"> • Special natural characteristics or cultural heritage, • Exceeded environmental quality standards or limited values. 	Although the strategy reaches all residents in Staffordshire, only key areas within the county will be affected by any potential specific works, such as infrastructure building (which will include specific environmental assessment at that time, for consideration to be taken accordingly). Any effects will be considered in the planning control process.
Effects on areas / landscapes which have a recognised national, community or international protection status.	

6. Conclusions

In conclusion, the 2013 refreshed strategy closely mirrors the strategy produced in 2007. Given that the refreshed strategy follows the same principles / values and there is no options assessment as there are no immediate plans for large infrastructure, it can be considered to be a minor modification of the 2007 strategy, and unlikely to have any significant environmental effects. As such, under Article 3.3 of Directive 2001/42/EC, a SEA is not required.

A screening process has been carried out and the justification for this conclusion is set out in detail. Further assessments will be carried out in the future where larger projects are judged to have the potential to produce environmental effects.




The Environment Agency, Natural England and English Heritage have [the statutory consultees for SEAs] have been invited to comment on the screening process and its conclusions. Their responses will be attached in Appendix 2 once received in response to this report.

Therefore, no full SEA will be conducted for the 2013 refresh of the Joint Municipal Waste Management Strategy for Staffordshire and Stoke on Trent. Monitoring to measure the ongoing environmental impacts of the strategy will remain as set out in the 2007 SEA.

Appendix 1 – Environmental assessment of the 2013 refreshed strategy’s key principles / core objectives

Sustainable Development Objective	
Population and human health	
To prevent the management of municipal waste having an adverse impact on the amenity of the residents	
To ensure that the management of municipal waste does not adversely affect the health of the population	
Biodiversity and flora / fauna	
To prevent the management of municipal waste having an unacceptable impact on designated nature conservation site and species, and where possible, seek positive improvement	
Material assets	
To move the treatment of municipal waste up the waste hierarchy	
Soil	
To encourage the use of previously developed land by municipal waste management facilities	
To prevent contamination or the permanent loss of the best and most versatile agricultural land	
Water	
To prevent the management of municipal waste having an unacceptable impact on main rivers, flood plains, and groundwater source protection areas and areas of high ground water vulnerability	
Air	
To prevent emissions from municipal waste facilities from having an unacceptable impact on the environment	
Climatic factors	
To reduce CO2 emissions	
To increase the contribution of energy recovered from waste to renewable energy targets	
Cultural heritage and landscape	
To prevent the management of municipal waste having an unacceptable impact on national parks, special landscapes, the historic environment, best /most versatile agricultural land and the greenbelt	

Key

+	Positive impact		Major impact
±	Neutral impact		Minor impact
-	Negative impact		Negligible impact
?	Uncertain impact [at this stage, due to uncertainty of specific objective deliverables - requires further investigation with a project SEA]		

2013 refreshed strategy; key principles / core objectives					
Waste Prevention	Efficiency Savings	Resource Recovery	Carbon Reduction	Infrastructure & Contracts	Municipal Waste
+	+ / ≠	?	+ / ≠	+	+
+	+ / ≠	+ / ≠	+ / ≠	+	+ / ≠
+	+ / ≠	+ / ≠	+ / ≠	+	+ / ≠
+	+ / ≠	+	+	+	+
≠	≠	≠	≠	+	?
≠	≠	+ / ≠	≠	≠	+ / ≠
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+	+ / ≠	+ / ≠	+	+	+ / ≠
?	?	?	+	+	?
≠	≠	+	?	+	?
≠	≠	+	+ / ≠	≠	+ / ≠

Appendix 2 – Responses from Statutory Consultees

Date: 21 October 2013
Our ref: 100620
Your ref: None

The logo for Natural England, featuring the words "NATURAL ENGLAND" in a bold, sans-serif font. "NATURAL" is in a light green color and "ENGLAND" is in a darker green color. The text is set against a solid light green rectangular background.

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BY EMAIL ONLY

Dear Ms Cocks,

Environmental Assessment Appraisal Report for the 2013 refresh of the Joint Municipal Waste Management Strategy for Staffordshire and Stoke on Trent

Thank you for your consultation on the above dated 20 September 2013 which was received by Natural England on 24 September 2013. I note that your consultation was sent by post to our Telford office. Natural England has a centralised consultation hub. Please send all future consultations to the hub, ideally by emailing consultations@naturalengland.org.uk or alternatively by writing to the address provided at the top of this letter.

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.

According to guidance on the SEA Directive, an SEA is not required to be undertaken on any document which is a minor modification on an already established document with a full SEA. We understand that this 2013 refreshed strategy is an update of the original strategy which was written in 2007 and which was subject to a full SEA. Under article 3.3 of the SEA Directive a full SEA is only required if the revised plan is considered likely to have significant environmental effects.

The matrix provided in *Appendix 1 – Environmental assessment of the 2013 refreshed strategy's key principles / core objectives* raises a high number of 'uncertainties'. We recommend that the LPA takes steps to minimise the number of uncertainties in this matrix, in order to provide a stronger conclusion that there are no significant environmental effects. This may necessitate undertaking further research or simply providing further explanation.

We are particularly concerned by the 'uncertain' relationship between the Plan and '*biodiversity and flora/fauna*', where there are 'uncertain impacts' in relation to 4 of the 6 core objectives ('*efficiency savings*', '*resource recovery*', '*carbon reduction*' and '*municipal waste*'). The yellow fill applied indicates that any potential effects are considered to be 'negligible'. However, the report does not provide any explanation of either the uncertainties or the assessment that any impacts will be negligible. We also note the uncertainties with respect to the plan's impact on soils, water, air and cultural heritage and landscape.

We would advise providing further justification and if necessary undertaking further research to address the uncertainties. If there is in fact a neutral relationship between the sustainability objective and the plan's core objectives then the matrix should be amended to show this. If there is no relationship between the sustainable development objective and the plan objectives then we

would suggest indicating this using a different symbol.

Provided that the information gaps outlined above can be addressed and that major impacts do not emerge, it is likely that Natural England would be satisfied that further Strategic Environmental Assessment of the Joint Municipal Waste Management Strategy is not required.

has identified are addressed, in order to better underpin the conclusion that there are no significant environmental effects.

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 queries relating to the specific advice in this letter only please contact Hayley Fleming on 0300 060 1594 or email hayley.fleming@naturalengland.org.uk. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely

Hayley Fleming
Land Use Operations (Worcester)

Date: 18 November 2013
Our ref: 102913
Your ref: None



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BY EMAIL ONLY

Dear Ms Cocks

Amendments to the Environmental Assessment Appraisal Report for the 2013 refresh of the Joint Municipal Waste Management Strategy for Staffordshire and Stoke on Trent

Thank you for your consultation on the above dated 30 October 2013 and received by Natural England on the same date.

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.

Thank you for your prompt action to amend the Environmental Assessment Appraisal Report in response to our previous recommendations (our response reference 100620). The amendments clarify the assessment of impacts and remove many of the 'uncertainties' which had been indicated in the previous iteration of the report. No negative impacts have been identified. Natural England is therefore satisfied that further assessment under the SEA Directive is not required.

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 queries relating to the specific advice in this letter only please contact Hayley Fleming on 0300 060 1594 or by email to hayley.fleming@naturalengland.org.uk. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely

Hayley Fleming
Land Use Operations (Development Plans Network)

Kay Cocks
Staffordshire Waste Partnership
Partnership Officer
East Staffordshire Borough Council
Millers Lane Depot
Burton-upon-Trent
DE14 2NS.

Our ref: UT/2007/101197/SE-
01/SC1-L01
Your ref:
Date: 11 November 2013

Dear Ms Cocks

**REFRESH OF THE JOINT MUNICIPAL WASTE MANAGEMENT STRATEGY FOR
STAFFORDSHIRE AND STOKE ON TRENT**

ENVIRONMENTAL ASSESSEMENT APPRAISAL REPORT

I write in response to your email of 05 November to our Customer Services team and apologise for the delay in responding.

The Environment Agency notes and supports your decision not to undertake a new SEA for your refreshed Joint Municipal Waste Management Strategy.

Yours faithfully

Mr Paul Gethins
Sustainable Places Team Leader

Please ask for: Jane Field

Direct Dial: 01543 404878

Direct Fax: 01543 444161

Direct email: jane.field@environment-agency.gov.uk

From: Torkildsen, Rohan [Rohan.Torkildsen@english-heritage.org.uk]
Sent: 25 October 2013 18:13
To: Kay Cocks
Subject: Staffordshire Waste Management Strategy - SEA Screening

Kay, my sincere apologies for the delay in this response to your letter dated 20 September.

I have no reason to question your conclusion that the refresh will be a minor modification unlikely to have significant environmental effects.

Noting the previous plan was prepared in 2007 you should be mindful of the NPPF (2012) and may also wish to consider the SEA/SA Guidance produced by EH in June 2013.

http://www.helm.org.uk/guidance-library/strategic-enviro-assessment-sustainability-appraisal-historic-environment/SA_SEA_final.pdf

Regards

Rohan Torkildsen | Historic Environment Planning Adviser | South West and West Midlands

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Notes



Staffordshire
Waste Partnership