

Stafford Borough
Local Plan 2020 - 2040:
Preferred Options
Responses

Agents, Developers and
Landowners - Part 1

Consultation Period: 24 October - 12 December 2022

Published: February 2023

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From: [REDACTED]
Sent: 08 December 2022 16:20
To: Strategic Planning Consultations
Cc: Strategic Planning; [REDACTED]
Subject: Representations by New Street LLP to Stafford Local Plan 2020-2040 Preferred Options Document
Attachments: SK_05 - Development Areas Plan - A1L - DRAFT - V2.pdf; Preferred-Options-Consultation-Response-Form Initial Representations by Applied Planning on behalf of New Street LLP.pdf; Preferred-Options-Consultation-Response-Form Initial Representations by Applied Planning on behalf of New Street LLP.docx

Dear Strategic Planning Team,

Please find attached a representation in both Word and PDF format to the Stafford Borough Plan Preferred Options Document. The representation is accompanied by Development Areas Plan SK05 which should be read alongside the representations.

These representations are submitted by Applied Town Planning Ltd on behalf of New Street LLP a joint venture company between Hortons' Estate Ltd and the Coates Family (Bet 365).

These representations are submitted within the consultation period, that being before 12 noon on 12th December 2022, and I would be grateful if you could confirm by reply to this email that the representations have been received and will be duly considered in the plan preparation process.

Kind Regards,

Paul Instone BSc (Hons) DipTP MRTPI
Director

appliedplanning

M: [REDACTED]
W: www.appliedtownplanning.com

Disclaimer:

This email is intended for the above named recipients. It should be regarded as strictly confidential and may be legally privileged. If you are not the intended recipient please do not read, print, store, re-transmit or act in reliance on it or any attachments. Instead please notify the sender and immediately and permanently destroy it.

Contact Details

Full name (required): Paul Instone

Email (required): 

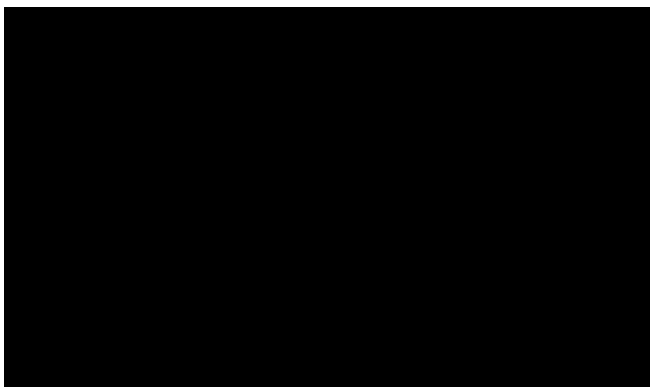
Tick the box that is relevant to you (required):

- Statutory Bodies and Stakeholders
- Agents and Developers
- Residents and General Public
- Prefer not to say

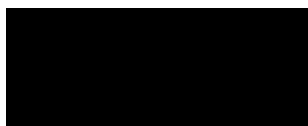
Organisation or Company Name (if applicable): Applied Town Planning Ltd on behalf of New Street LLP a joint venture company between Hortons' Estate Ltd and the Coates Family (Bet 365).

Tick the box that is relevant to you:

(This is a non-mandatory question but helps us understand the demographic of our respondents.)



Do you want to be added to our Local Plan consultation database to be notified about future local plan updates?



Contents

The Local Plan Preferred Options includes the topics listed below.

Each topic has a series of standard questions in order for you to provide a response. You do not have to respond to each of the topics or answer all of the questions. The page numbers below relate to the page the topic starts in this consultation form.

- **Vision and Objectives** - page 5
- **Development Strategy and Climate Change Response** - page 6
- **Meecebrook Garden Community** - page 9
- **Site Allocation Policies** - page 10
- **Economy Policies** - page 14
- **Housing Policies** - page 16
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All of the local plan documents and the Local Plan 2020-2040: Preferred Options document are available here: <https://www.staffordbc.gov.uk/local-plan>

Vision and Objectives

Q1. There are eight objectives for the local plan to achieve the vision of:

"A prosperous and attractive borough with strong communities."

Of the following objectives which 3 are the most important to you?

Please make your choice from the list of objectives below. (Maximum of 3 to be selected)

Local Plan Preferred Options document reference: Page 12

Contribute to Stafford Borough being net zero carbon by ensuring that development mitigates and adapts to climate change and is future proof.

To develop a high value, high skill, innovative and sustainable economy.

To strengthen our town centres through a quality environment and flexible mix of uses.

To deliver sustainable economic and housing growth to provide income and jobs.

To deliver infrastructure led growth supported by accessible services and facilities.

To provide an attractive place to live and work and support strong communities that promote health and wellbeing.

To increase and enhance green and blue infrastructure in the borough and to enable greater access to it while improving the natural environment and biodiversity.

To secure high-quality design.

Development Strategy and Climate Change Response

Q2. The development strategy and climate change response chapter includes the policies below.

Do you agree with each of the policies in this chapter?

Select Yes or No for each of the policies and then use the box below each policy to add additional comments.

Ensure any comments relate to the policy comment box you are completing.

Local Plan Preferred Options document reference: Pages 19 to 40

Policy 1. Development strategy (which includes the total number of houses and amount of employment land to be allocated and the Stafford and Stone settlement strategies)

Yes

Policy 1 Comments:

We welcome that the Development Strategy recognises that provision should be made for at least 80 hectares of employment land. This figure should be seen as a minimum requirement for new employment land provision during the plan period. It is also welcomed that the criterion D2 identifies that the employment land requirements will be delivered through the completion of existing land commitments as detailed in Appendix 7, which includes land at Hixon Airfield Industrial Estate which is shown to deliver 7 hectares of employment land and benefits from planning permission reference 19/31520/REM.

The land edged red on Plan SK05 attached to this representation is at an advanced stage of being purchased by New Street LLP a joint venture company between Hortons' Estate Ltd and the Coates Family (Bet 365). New Street LLP strongly considers that the boundary of the Hixon Airfield Recognised Industrial Estate should be extended to include all of the area shaded orange on Plan SK05 which extends to 6.24ha. This parcel of land shaded orange is bounded by land which benefits from planning permission 19/31520/REM to the south, existing employment development to east, the land to the west is used for the storage of heavy goods vehicles and the land to the north is subject to a current planning application (reference 19/31487/COU) for the change of use of concrete runway for storage of vehicles and associated perimeter fencing and landscape improvements. The development of the parcel of land shaded orange would therefore clearly represent a logical extension to Hixon Airfield Industrial Estate, as it is an isolated parcel of undeveloped land which is severed from the wider open countryside and is characterised as an undeveloped plot of land within an otherwise industrial area. New Street LLP advises that within the early part of the plan period up to 2041, a planning application for employment uses on this parcel of land will be submitted and it is considered that such a proposal would represent sustainable development. In accordance with paragraph 8 of the NPPF, employment uses on this site would amount to making the effective use of land in the right place insofar as employment uses on this site would help to build a strong and competitive economy by providing the right type of development in the right place. Given the characteristics of the site, its development would not give rise to environmental harms, including landscape harms, as the parcel of land is all but contained by employment uses. It is strongly considered that the development of the parcel of land for employment uses would represent sustainable development in accordance with paragraph 8 of the NPPF.

Paragraph 15 of the NPPF confirms that the planning system should be genuinely plan-led and provide a positive vision for the future of an area. Paragraph 9 of the NPPF also confirms, inter alia, that the objectives of sustainable development should be delivered through the preparation and implementation of plans and that planning policies should provide an active role in guiding development towards sustainable solutions.

The new Plan for Stafford will play an essential role in delivering the sustainable growth of Stafford Borough over the plan period and importantly, given the primacy of the development plan in the development control decision-making process, allocations within the development plan provide certainty and re-assure landowners and developers when making investment decisions.

It is welcomed that Policy 1 and the Development Strategy does not seek to limit the quantum of employment land and in fact allocations and commitments exceed the requirement of 80 hectares. However, plans should be positively prepared as required by paragraph 35a of the NPPF and meeting an area's objectively assessed needs should be a minimum requirement.

However, as set out in paragraphs 16(a) and 35(d) of the NPPF, development plans should also enable and contribute to the achievement and delivery of sustainable development. In this instance, the parcel of land shaded orange on Plan SK05 has unique characteristics insofar as it is largely contained by employment and storage uses. The inclusion of this land into Hixon Airfield Industrial Estate would be a logical extension of the Recognised Industrial Estate and in a development plan which is being positively prepared to deliver sustainable development, the development plan should positively respond to the clearly identified opportunities that exist to deliver sustainable development. The allocation of this parcel of land within the Recognised Industrial Estate would establish that the principle of employment development is acceptable. The allocation would therefore provide certainty to landowners and developers when making investment decisions, but of course the development control process would still require all other material considerations to be taken into account in the determination of the application to ensure matters such as highways and landscape impacts are acceptable.

New Street LLP are engaging in the plan preparation process and re-iterate that the planning system should be genuinely plan-led and provide a positive vision for the future of an area. We therefore respectfully request that Stafford Council, prepares it's a plan in a positive manner and provides an active role in enabling the extension of the Recognised Industrial Estate and use the mechanism of the emerging Stafford Borough Local Plan to put a positive planning policy framework in place and provide an active role in guiding the future development of this site to achieve sustainable development solutions.

Policy 2. Settlement Hierarchy (Tier 1: Stafford, Tier 2: Stone, Tier 3: Meecebrook, Tier 4: Larger settlements, Tier 5: Smaller settlements)

Yes / No

Policy 2 Comments:

No comments to make

Policy 3. Development in the open countryside - general principles

No

Policy 3 Comments:

This policy is not positively prepared. Criterion A seeks to restrict 'unnecessary' development in the open countryside and this is inconsistent with the NPPF. The planning system should guide sustainable development and development plans should be positively prepared and the starting point for development plan policies should not be to define development in the open countryside as 'unnecessary'. It is not positive to assume that as a starting point of Policy 3 that all development in open countryside is 'unnecessary' and 'incongruous'. This is not the case and cannot be starting point for a development plan policy.

This policy is currently drafted as a 'nil detriment' policy and defines any development outside of pre-defined categories as unacceptable. This approach does not allow for a balance of harms against benefits in the decision-making process in order to allow consideration of the economic, social and environment objectives to achieve sustainable development.

It is suggested that the policy is re-worded to be positively prepared and enable sustainable development in the open countryside where appropriate, or a further category of 'acceptable development' is added where development will be supported if the proposal is sustainable development and/or the benefits of the development outweigh the harms.

As currently drafted we consider that this policy is in conflict with paragraph 35(d) of the NPPF as it would restrict the delivery of sustainable development in accordance with the policies of the NPPF.

Policy 4. Climate change development requirements

Yes / No

Policy 4 Comments:

No comments to make

Policy 5. Green Belt

Yes / No

Policy 5 Comments

No comments to make

Policy 6. Neighbourhood plans

Yes / No

Policy 6 Comments:

No comments to make

Meecebrook Garden Community

Q3. The local plan proposes a new garden community called Meecebrook close to Cold Meece and Yarnfield. This new community is proposed to deliver housing, employment allocations, community facilities, including new schools, sport provision and health care facilities, retail and transport provision, which includes a new railway station on the West Coast Main Line, and high quality transport routes.

Do you agree with the proposed new garden community?

Yes / No

Explain your reasoning and add any evidence to justify your response.

Ensure any comments relate to the policy comment box you are completing.

Local Plan Preferred Options document reference: Pages 41 to 45

Comments:

No comments to make

Site Allocation Policies

Q4. The Stafford Borough Local Plan 2020 - 2040 proposes allocations for both housing and employment to meet the established identified need.

The site allocation policies chapter includes the policies below for housing and employment allocations.

Do you agree with the proposed allocations?

Select Yes or No for each of the following policies and then use the box below each policy to add additional comments.

Explain your reasoning and add any evidence to justify your response. Please provide details of alternative locations for housing and employment growth if you consider this is appropriate.

Ensure any comments relate to the policy comment box you are completing.

If you do want to submit a new site for consideration through the local plan process, we are still accepting sites through the Call for Site process, details are available here: <https://www.staffordbc.gov.uk/call-sites-including-brownfield-land-consultation>

Local Plan Preferred Options document reference: Pages 47 to 56 and appendix 2.

Policy 9. North of Stafford

Yes / No

Policy 9 Comments:

No comments to make

Policy 10. West of Stafford

Yes / No

Policy 10 Comments:

No comments to make

Policy 11. Stafford Station Gateway

Yes / No

Policy 11 Comments:

No comments to make

Policy 12. Other housing and employment land allocations.

(In your response, please specify which particular site you are referring to, if relevant.)

Yes / No

Policy 12 Comments:

No comments to make

Q5. The Stafford Borough Local Plan 2020 - 2040 proposes to allocate land for Local Green Space and Countryside Enhancement Areas throughout the borough.

The policies which relate to these proposals are listed below.

Do you agree with the proposed allocations?

Select yes or no for each of the policies and then use the box below each policy to add additional comments.

Explain your reasoning and add any evidence to justify your response.

Ensure any comments relate to the policy comment box you are completing.

Local Plan Preferred Options document reference: Pages 56 to 59 and appendix 2.

Policy 13. Local Green Space

(In your response, please specify which particular site you are referring to, if relevant)

Yes / No

Policy 13 Comments:

No comments to make

Policy 14. Penk and Sow Countryside Enhancement Area (Stafford Town)

Yes / No

Policy 14 Comments:

No comments to make

Policy 15. Stone Countryside Enhancement Area

Yes / No

Policy 15 Comments:

No comments to make

Economy Policies

The Economy Policies chapter contains policies that seek to protect employment land and support economic growth within the Borough.

Q6. The local plan seeks to protect previously allocated and designated industrial land and support home working and small-scale employment uses.

The relevant policies are: 16, 17 and 18.

Do you agree with these policies?

We agree with these policies but the boundary of Hixon Airfield Industrial Estate should be expanded as set out in our response to Policy 17 below.

Select Yes or No and then use the box to add additional comments. If referring to a specific policy, please include the policy number.

Explain your reasoning and add any evidence to justify your response.

Ensure any comments relate to the policy comment box you are completing.

Local Plan Preferred Options document reference: pages 61 to 65

Comments:

Policy 17: Recognised Industrial Estate

Applied Town Planning Ltd have acted for the owners of Hixon Airfield Industrial Estate for approximately a decade and we have worked with the owners to obtain outline planning permission (reference 14/20587/OUT) and reserved matters permission (reference 19/31520/REM) for the extension of the industrial estate into the remainder of the Recognised Industrial Estate Boundary. These planning permissions have been implemented.

Unfortunately, during this time, the original owners of the Industrial Estate have passed away and the sale of the Industrial estate and the land which benefits from planning permission 19/31520/REM and the land to north shaded orange on Plan SK05 is currently in the process of being sold to New Street LLP a joint venture company between Hortons' Estate Ltd and the Coates Family (Bet 365).

The new owners are active developers and will be continuing to progress ahead with the development of the land parcel subject to planning permission 19/31520/REM shortly. Ahead of continuing with the implementation of the planning permission, New Street LLP have reviewed the extant planning permission and want to progress with a comprehensive development solution which includes the land which benefits from planning permission 19/31520/REM as well as land to the north which is shaded orange on Plan SK05 and extends to 6.24ha.

For these reasons, New Street LLP are seeking the inclusion of the land shaded orange on Plan SK05 into the Recognised Industrial Estate so that the wider site can be developed in a comprehensive manner. The extension of the Recognised Industrial Estate boundary would provide certainty that the principle of employment uses in the land shaded orange is acceptable to the local planning authority. This would in turn mean that the design and layout of the scheme can be moved forward on a comprehensive site wide basis allowing for site wide infrastructure such as roads, power supply, drainage, landscaping and ecological and biodiversity enhancements to be considered in the design approach comprehensively. This comprehensive approach will ultimately lead to a higher quality overall scheme which is not designed and planned on a piecemeal basis.

The development of the wider parcel of land would give rise to very substantial planning benefits through delivering premises for new and expanding businesses within Stafford, facilitating job creation and creating economic growth. Given the site context, harms, including landscape harm, from the development of the land shaded orange would be minimal. We therefore consider that when a planning application within includes the land shaded orange is submitted for employment uses, planning permission would be granted as the proposal would be demonstrated to be sustainable development and the benefits of the proposal would clearly outweigh the harms in the planning balance.

Notwithstanding this matter, it is the case the development plan will be the starting point for decision-making for any future planning application. Therefore, New Street LLP are engaging in the plan preparation process and request that Stafford Council prepares it's a plan in a positive manner and provides an active role in enabling the extension of the Recognised Industrial Estate and allocate the land shaded orange in the emerging Local Plan.

This positive action by the Council in preparing the emerging Local Plan will provide certainty for the future site owners and will help create conditions in which businesses can invest, expand and adapt. It will also enable development decisions to be undertaken on a site-wide comprehensive basis which will ultimately have the effect of delivering a higher quality comprehensive development as investment and infrastructure decisions will not need to be made in an investment environment in which there is uncertainty on whether and when employment development will be permitted on the land shaded orange.

Notwithstanding, our clear view that the whole of the land shaded orange should be included in the Recognised Industrial Estate, if the local planning authority do not accept the clear benefits of this approach, New Street LLP request that the Recognised Industrial Estate is extended by 1.91 hectares to include the area 'hatched star' orange on Plan SK05.

As new owners of the site, New Street LLP have undertaken a comprehensive review of implemented planning permission 19/31520/REM which permits circa 21,500 sq m of floorspace in 5no. units ranging from 2,500 sqm to 6,890 sq m. New Street LLP have an extensive track record of developing industrial estates and will be submitting a new planning application for an amended scheme on the land which benefits from planning permission 19/31520/REM. Based on their commercial knowledge of the market, New Street LLP strongly consider that the market demand in this location is for smaller units than currently permitted and the revised scheme will include a wider range of units of different sizes, including more smaller units, to meet the needs of small and medium businesses. New Street LLP have also been liaising with Western Power regarding power supply to the new industrial estate and it has become apparent that due to constraints in the existing power supply network

at the existing industrial estate it will be necessary to construct a new sub-station to provide a power source for the new employment units. This sub-station will need to extend to 40 metres by 40 metres.

Hortons' have been considering a range of development options on the site to accommodate a revised scheme with smaller units and a sub-station and it has become evident that due to the constraints of the gas pipeline and the requirement for a 15 metre buffer zone either side of the pipeline, the site's ability to deliver 21,500 sq m of floorspace in smaller format units is severely constrained.

Therefore, whilst it is New Street LLP's primary case that the boundary of Recognised Industrial Estate should be extended to include all of the land shaded orange on Plan SK05, should the local planning authority not accept these representations, then it is requested that boundary of the Recognised Industrial Estate be extended to include the land which is 'hatched star' orange on Plan SK05. This would amount to a 1.91 ha extension in the size of the Recognised Industrial Estate and would facilitate the development of the broad quantum of floorspace permitted under permission 19/31520/REM but within a range of smaller units. The increased area would also facilitate options to include a new substation to serve the new employment uses. This additional parcel of land is read as part of the land parcel which benefits from planning permission and it is considered that its inclusion within the Recognised Industrial Estate would give rise to negligible landscape harm, but would allow for the delivery of a development scheme with smaller units which met the commercial requirements of the market.

Q7. The Stafford Borough Plan proposes policies around the town centres uses, agriculture and forestry development, tourism development and canals.

The relevant policies are: 19, 20, 21 and 22.

Do you agree with these policies?

Yes / No

Select Yes or No and then use the box below to add additional comments. If referring to a specific policy, please include the policy number.

Explain your reasoning and add any evidence to justify your response.

Ensure any comments relate to the policy comment box you are completing.

Local Plan Preferred Options document reference: pages 65 to 71

Comments:

No comments to make

Housing Policies

The Housing Policies chapter contains policies that seek to provide for identified need across the borough and support houseowners.

Q8. The local plan proposed a policy (Policy 23) on affordable housing.

Do you agree with this policy?

Yes / No

Select yes or no and then use the box below to add additional comments.

Explain your reasoning and add any evidence to justify your response.

Ensure any comments relate to the policy comment box you are completing.

Local Plan Preferred Options document reference: pages 74 to 76

Comments:

No comments to make

Q9. The local plan proposes a policy (Policy 30) to help meet identified local need for pitches for Gypsies and Travellers. There are 2 new proposed sites; one near Hopton and the other near Weston.

Do you agree with this policy?

Yes / No

Select yes or no and then use the box below to add additional comments. In your response, please specify which particular site you are referring to, if relevant.

Explain your reasoning and add any evidence to justify your response.

Ensure any comments relate to the policy comment box you are completing.

Local Plan Preferred Options document reference: pages 84 to 86

Comments:

No comments to make

Q10. The local plan proposes policies around homes for life, rural exception sites, new rural dwellings, replacement dwellings, extension of dwellings, residential subdivision and conversion, housing mix and density, residential amenity and extension to the curtilage of a dwelling.

The relevant policies are: 24, 26, 27, 28, 29, 21, 31, 32 and 33.

Do you agree with these policies?

Yes / No

Select yes or no and then use the box below to add additional comments. If referring to a specific policy, please include the policy number.

Explain your reasoning and add any evidence to justify your response.

Ensure any comments relate to the policy comment box you are completing.

Local Plan Preferred Options document reference: pages 73 to 89

Comments:

No comments to make

Design and Infrastructure Policies

Q11. The design and infrastructure chapter contains policies on urban design general principles, architectural and landscape design, infrastructure to support new development, electronic communications, protecting community facilities and renewable and low carbon energy.

The relevant policies are: 34, 25, 36, 37, 38, 39 and 40.

Do you agree with these policies?

Yes / No

Select yes or no and then use the box below to add additional comments. If referring to a specific policy, please include the policy number.

Explain your reasoning and add any evidence to justify your response.

Ensure any comments relate to the policy comment box you are completing.

Local Plan Preferred Options document reference: Pages 91 to 99.

Comments:

No comments to make

Environment Policies

Q12. The environment policies chapter contains policies on the historic environment, flood risk, sustainable drainage, landscapes, Cannock Chase Area of Outstanding Natural Beauty (AONB), Green and blue infrastructure network, biodiversity, Special Areas of Conservation (SAC), Trees, Pollution and Air Quality.

The relevant policies are: 31, 42, 43, 44, 45, 46, 47, 48, 49, 50 and 51.

Do you agree with these policies?

Yes / No

Select yes or no and then use the box below to add additional comments. If referring to a specific policy, please include the policy number.

Explain your reasoning and add any evidence to justify your response.

Ensure any comments relate to the policy comment box you are completing.

Local Plan Preferred Options document reference: Pages 101 to 119.

Comments:

No comments to make

Connections

Q13. The connections policies chapter contains policies on transport and parking standards.

The relevant policies are: 52 and 53

Do you agree with these policies?

Yes / No

Select yes or no and then use the box below to add additional comments. If referring to a specific policy, please include the policy number.

Explain your reasoning and add any evidence to justify your response.

Ensure any comments relate to the policy comment box you are completing.

Local Plan Preferred Options document reference: Pages 121 to 124.

Comments:

No comments to make

Evidence Base

To support the Local Plan 2020-2040 an evidence base has been produced.

The evidence base is available to view on our website here:

www.staffordbc.gov.uk/new-lp-2020-2040-evidence-base

Q14. Have we considered all relevant studies and reports as part of our local plan?

Yes / No

Select yes or no and then use the box below to add additional comments.

Explain your reasoning and add any evidence to justify your response.

Ensure any comments relate to the policy comment box you are completing.

Comments:

No comments to make

Q15. Do you think there is any further evidence required?

Yes / No

Select yes or no and then use the box below to add additional comments.

If you think additional evidence is needed, please state what you think should be added and explain your reasoning.

Ensure any comments relate to the policy comment box you are completing.

Comments:

No comments to make

General Comments

If you have any further comments to make on the Local Plan Preferred Options document and evidence base, please use the box below.

If you need further space to add comments, please add pages to the end of the consultation form and reference which question you are answering.

Thank you for taking the time to complete this consultation form.

Completed forms can be submitted by email to:
strategicplanningconsultations@staffordbc.gov.uk

Or returned via post to: Strategic Planning and Placemaking, Stafford Borough Council, Civic Centre, Riverside, Stafford, ST16 3AQ

The consultation closes at 12 noon on Monday 12 December 2022, comments received after this date may not be considered.

**LAND PROPOSED TO BE INCLUDED
IN RECOGNISED INDUSTRIAL ESTATE**

Total Area: 62,399 sq.m (6.2399 hectares)

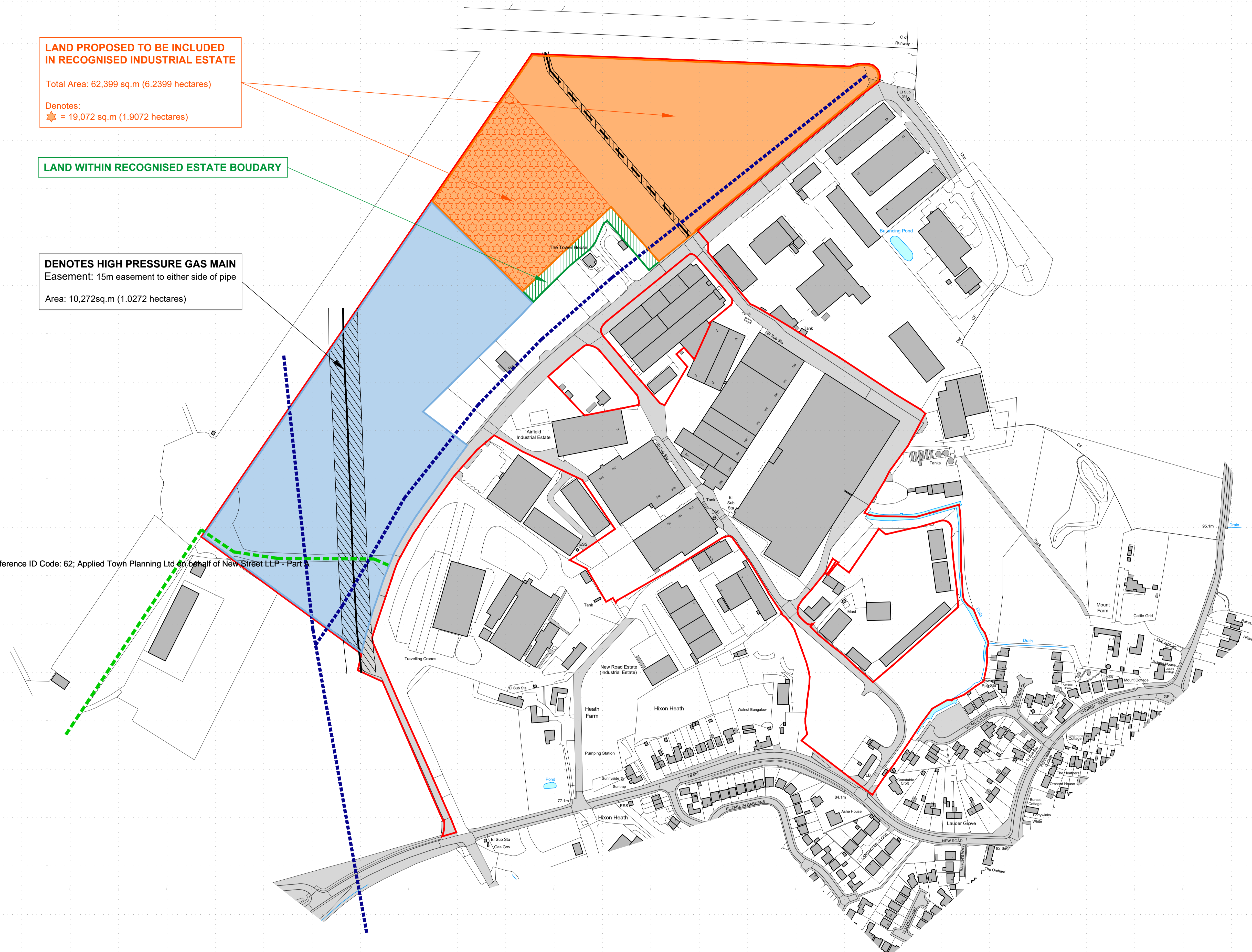
Denotes:
★ = 19,072 sq.m (1.9072 hectares)

LAND WITHIN RECOGNISED ESTATE BOUDARY

DENOTES HIGH PRESSURE GAS MAIN
Easement: 15m easement to either side of pipe

Area: 10,272sq.m (1.0272 hectares)

Reference ID Code: 62; Applied Town Planning Ltd on behalf of New Street LLP - Part C



General Notes
Drawing based on Ordnance Survey data and subject to full topographical line and level survey.
All drawing information should be taken from figured dimensions only. Do not scale.

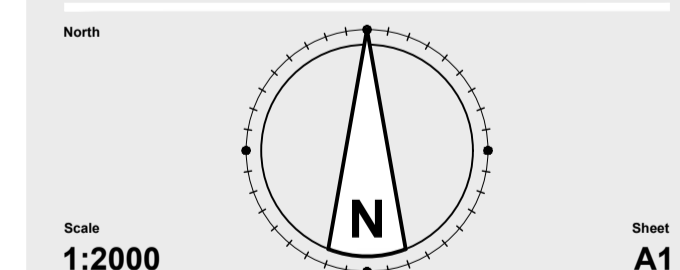
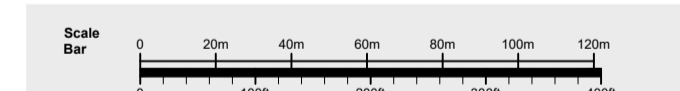
Disclaimer
All images used, where provided, are for illustrative purposes only and are intended to convey the concept and vision for the proposals. They are for guidance only.
Floor plans and elevations, where provided, are intended to give a general indication of the proposed layout only.

- PLEASE NOTE THE FOLLOWING EXCLUSIONS AND ASSUMPTIONS:**
- This drawing does not include any input from the wider Design Team.
 - This drawing does not include any input from an M&E Services Engineer.
 - This drawing does not include any input from an Structural Engineer.
 - Floor areas stated are an approximate measure and do not include any allowances for internal wall linings or wall type construction.
 - Structural requirements, wall construction, external and finished floor levels subject to further design development.
 - Layout and design subject to confirmation of the Title Boundary and receipt of a full Topographical/Measured Building & Utility Survey information.
 - This drawing is subject to design changes to meet Statutory requirements, Planning and Building Control requirements.
 - This drawing is to be read in conjunction with the accompanying specification where provided.
 - Proposals subject to sound testing requirements in accordance with Building Regulations Part B and Part E.
 - Please note, no allowances made for internal wall linings.
 - New party walls based on a nominal wall thickness of 300 mm.
 - Floor plans subject to fire strategy review by fire consultant.

OS DATA (Promap)
Drawing based on survey supplied by Landmark Information Group Ltd.
Dated: 07.07.22
Drawing number(s): Licence number 100022432

REV	DESCRIPTION	DRWN	AUTH	DATE

D R A F T



Project:
Airfield Industrial Estate
Hixon, Stafford, ST18 0PF
Client:
Hortons Estate Ltd. Project No. **00A000**

Drawing Title:
Development Areas Plan

Date: **November 2022** Drawn by: **TV** Authorised by: **NC**

Drawing No. **SK_05**

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KEY

- RED LINE OWNERSHIP BOUNDARY
Subject to Client confirmation
- EXISTING BUILDINGS
- PLANNING CONSENTED LAND

- ALTERNATIVE DEVELOPMENT LAND
- PROW
Existing - Hixon 23
- APPROXIMATE SEWER LOCATION
Existing 750 dia subject to confirmation

- HIGH PRESSURE GAS MAIN
15m easement to either side of pipe
- MEDIUM PRESSURE GAS MAIN
3m easement to either side of pipe

From: Georgina Blackburn [REDACTED]
Sent: 12 December 2022 11:31
To: Strategic Planning Consultations; Strategic Planning
Cc: [REDACTED]
Subject: Representations to Preferred Options - Land at Eccleshall Road, Stone
Attachments: Final Representations_Eccleshall Road Stone_12122022_compressed.pdf

Dear Sir or Madam,

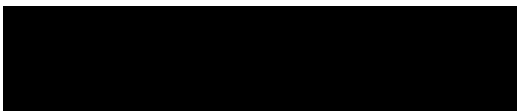
Representations to Local Plan 2020-2040 Preferred Options Document – Land at Eccleshall Road, Stone

On behalf of Richborough Estates, please find attached representations to the Local Plan 2020-2040 Preferred Options Document.

I would be grateful if you could confirm receipt of this email and the attachment.

Best wishes,
Georgina

Georgina Blackburn
Planner



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Response to the Stafford Borough Local Plan 2020-2040: Preferred Options

On behalf of Richborough Estates Ltd.

In relation to:

Land at Eccleshall Road, Stone

12th December 2022

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APPENDICES

APPENDIX 1 - Site Location Plan

APPENDIX 2 - Vision Document

APPENDIX 3 – Meecebrook: Review of Passenger Rail Station Proposals

Prepared By: Jon Power (Associate Partner) and Georgina Blackburn (Planner)

Asteer Planning LLP, 

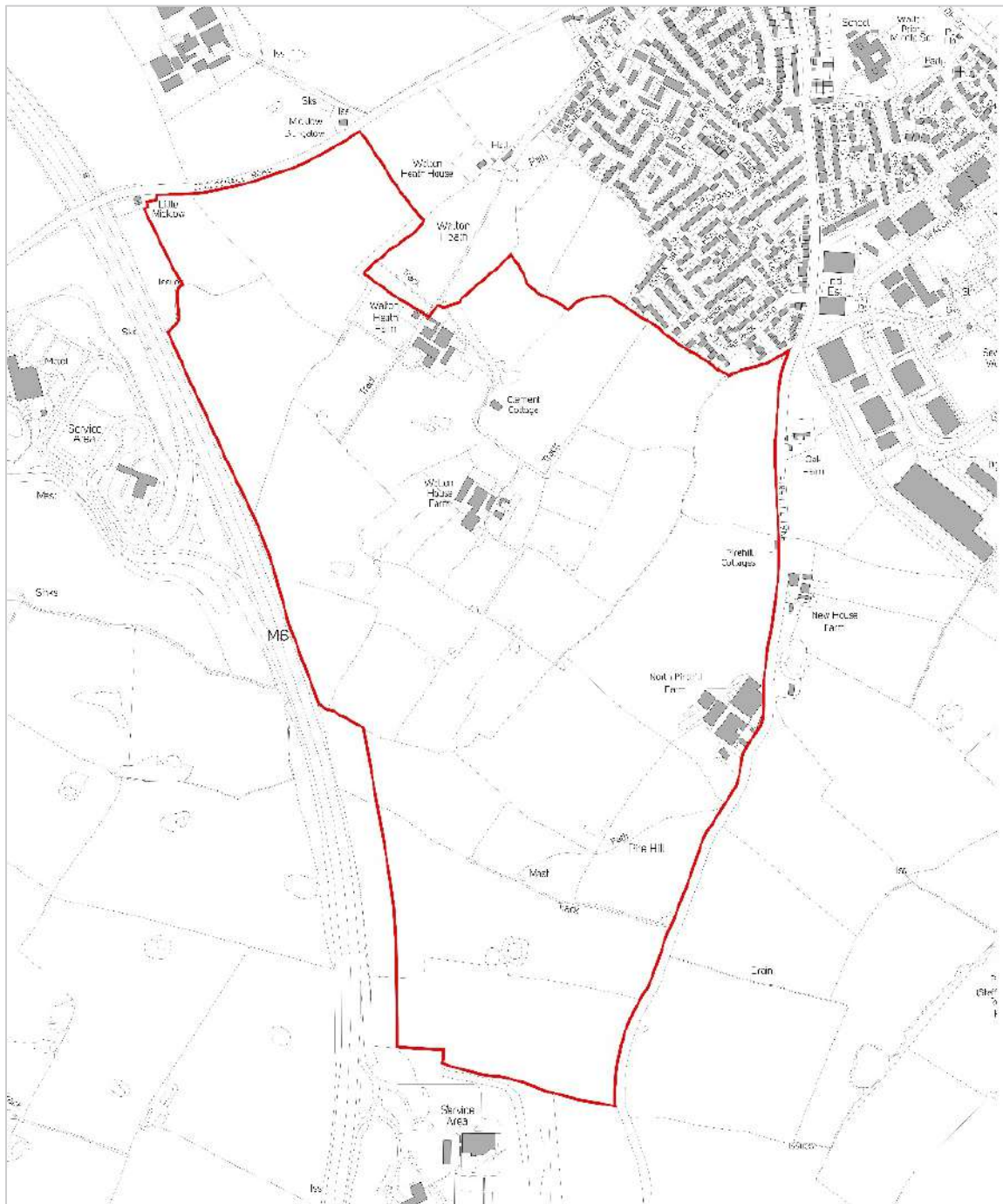
Version Final

Date: 12th December 2022

1 INTRODUCTION

1.1 Thank you for providing an opportunity to comment on the Stafford Borough Council (herein referred to as “SBC” or “the Council”) Local Plan 2020-2040 Preferred Options Consultation (“Preferred Options”). Asteer Planning LLP (“Asteer”) acts on behalf of Richborough Estates Ltd (“Richborough”) in relation to land under its control at Eccleshall Road, Stone (“the site”). The land in total extends approximately 125 hectares - a location plan of the site provided below in Figure 1 and enclosed as **Appendix 1**.

Figure 1: Site Location Plan



- 1.2 These Representations have been prepared by Richborough to provide comments on the vision, spatial strategy and key policies of the Preferred Options; and to demonstrate the availability, suitability and deliverability of land at Eccleshall Road to provide a high quality residential-led development, which could also deliver significant community infrastructure, as part of a balanced spatial strategy for Stafford.
- 1.3 The site offers the potential to deliver a logical and sustainable extension to the west of Stone, as a focus for growth in the Borough's settlement hierarchy, and provides an opportunity to deliver approximately 800 high quality family and affordable homes, alongside new community infrastructure, to meet the housing needs of the Borough.
- 1.4 The site's development for housing would build upon the established residential character of the area, reinforced by new developments in the locality that have recently been brought forward by Persimmon Homes, Anwyl Homes and Taylor Wimpey, in addition to the Preferred Options Proposed Housing Site Allocation (Site ST007), which is immediately to the north-east of the site. Nevertheless, the site's development must be seen not only in the context of the existing and emerging residential development within the area, but also in the context of HS2, which will create a significant alteration to the countryside to the east of the M6 motorway that will considerably change the character/function of the open countryside to the west of the town.
- 1.5 These Representations should be read in conjunction with the Vision Document for the site, which has been prepared by Richborough and is enclosed at **Appendix 2**, and a review of the proposals for a passenger rail station at Meecebrook (undertaken by Intermodality Transport Consultants) provided at **Appendix 3**. The Vision Document demonstrates the availability, suitability and deliverability of the site at land at Eccleshall Road, Stone, and outlines the significant benefits that the delivery of the site for residential-led development would bring to the Borough and to Stone.

Content

- 1.6 These Representations provide detailed comments on the Preferred Options Local Plan, including:
1. **The Development Strategy** – including the strategic direction of the Local Plan, the spatial strategy, settlement hierarchy and key strategic policies.
 2. **Strategic Allocations** – critically analysing the suitability and deliverability of the proposed strategic allocations at the Meecebrook Garden Community and the Stafford Station Gateway.

3. **Site Selection and Allocations** – providing comment on the proposed site allocations and the site selection process – as it relates to Stone and, in particular, the Richborough’s site at land at Eccleshall Road.

1.7 Richborough would welcome ongoing engagement with the Council as the preparation of the Local Plan is progressed and would be happy to discuss any feedback in relation to these representations or the site specific material submitted as part of this Representation and the Call for Sites process.

2 BACKGROUND & INTRODUCTION

2.1 The Preferred Options consultation was published for comment on 24th October 2022 and contains a range of information, evidence and policy direction on which comment is invited, including:

- **The Preferred Options Local Plan** – which includes housing and employment land requirements, the broad spatial distribution of these uses, proposed development allocations including strategic allocations at the Stafford Station Gateway and a new Garden Community at Meecebrook; and a range of draft planning policies on topics such as climate change, economic development, housing provision, transport and the environment; and,
- **Evidence Base** - a range of new evidence base documents that support the emerging Local Plan's spatial strategy, land allocations and detailed policies.

2.2 These Representations provide detailed comments on the Preferred Options and its supporting documentation, with particular reference to how it relates to Richborough's site at land at Eccleshall Road, Stone.

3 THE DEVELOPMENT STRATEGY

3.1 This section provides a response to the Preferred Options overarching Development Strategy, including the scale and distribution of development needs and the proposed settlement strategy.

Development Needs

3.2 **Policy 1 (Development Strategy)** of the Preferred Options sets out that between 2020 and 2040, provision will be made for 10,700 new homes (equating to 535 new dwellings per annum (“dpa”)) and 80 hectares of employment land.

3.3 Richborough recognise that the identified housing need encompasses an uplift from the standard method requirement (391dpa) to account for ‘jobs based’ growth (to 435dpa) and to accommodate 2,000 units to meet the unmet needs of neighbouring authorities (an additional 100dpa). However, Richborough consider that this target is not ambitious for a Borough with unique strategic opportunities, and which will have a generational opportunity for growth following the arrival of HS2.

3.4 Lichfields has prepared an Economic and Housing Development Needs Assessment (“EHDNA”) to underpin Stafford’s development needs and inform its development strategy. It considers 7 scenarios for housing growth, ranging from the Government’s Standard method (408dpa¹) to accelerated jobs growth scenarios (up to 746 dpa). The two highest growth scenarios are:

- **Scenario E (Jobs Growth Regeneration):** supporting a requirement of 646dpa (or 711dpa including PCU²) – this scenario considers the implications of a new Garden Community and Stafford Station Gateway with respect to the jobs these developments are expected to generate.
- **Scenario F (Past Trends Scenario):** supporting a requirement of 683dpa (or 746 dpa including PCU) – this scenario that assumes that the CAGR³ rate of jobs growth of 0.83% experienced between 2000 and 2018 is continued over the Plan Period.

3.5 Richborough considers that, as a minimum, the housing need should reflect a level of jobs growth that supports regeneration and the delivery of the major strategic allocations identified in the emerging Local Plan. However, we believe that jobs growth over and

¹ Government LHN in 2020, when the EHDNA was published

² Partial Catch Up

³ Compound Annual Growth Rate

above past trends could occur over the forthcoming Plan Period, based on the exceptional growth potential of the Borough and, therefore, a housing need of **746dpa or above** should be considered to support a truly transformational Local Plan. Richborough consider that there is a compelling case to advocate strongly for a more ambitious housing target based on the following:

a) Supporting the Exceptional Growth Potential of Stafford

3.6 Stafford has enormous potential to catalyse its growth during the forthcoming Plan Period. The emerging Local Plan is an opportunity to support this growth, which if missed, could stifle the economic potential of Stafford for the next 30 years. The potential of Stafford is driven by:

- Its accessibility, strategic transport links and key strategic location as an anchor location between the West Midlands and the North;
- Major employment growth, both in traditional and logistics opportunities across the Borough, and in the regeneration opportunities that exist at the Stafford Station Gateway (and beyond); and
- The arrival of HS2 in Stafford which will allow travel between Stafford and London Euston in just 55 minutes, and which presents huge opportunities for the town, not only in the Stafford Gateway area, but across the Borough. A failure to provide the type and quality of homes and infrastructure to support the arrival of HS2 would be a major missed opportunity to set the platform to catalyse the future growth of the Borough for the next generation.

3.7 The Constellation Partnership, an alliance of 7 Local Authorities across Staffordshire and Cheshire⁴, prepared a Growth Strategy in 2018 which sought to deliver transformational economic growth, supported by the arrival of HS2, with accelerated growth envisaged across the region by 2040. The overarching Growth Strategy of the Constellation Partnership sought to support the delivery of at least 120,000 new jobs, 100,000 new homes and £6 bn per year of Gross Value Added (“GVA”) by 2040⁵ across the partnership area.

⁴ Including Stafford, Staffordshire, Newcastle-under-Lyme, Stoke-on-Trent, Staffordshire Moorlands, Cheshire East and Cheshire West and Chester

⁵ Constellation Partnership Growth Strategy (October 2018)

- 3.8 The Constellation Partnership Growth Strategy advocates for 'accelerated' housing delivery, over and above existing trends, stating that the area should deliver *"at least 100,000 new homes, by accelerating the delivery of the 77,000 homes identified within Local Plans, on a series of key strategic sites which align with our objective of securing 'good growth', ensuring that the supply of housing delivers a broad range of new homes that are affordable and accessible to people where they need or choose to be⁶".*
- 3.9 In addition, the Stoke-on-Trent and Staffordshire Local Enterprise Partnership ("SSLEP") prepared a Strategic Economic Plan ("SEP") in 2014 (updated in 2018) which also recognises the enormous growth potential of the region, including Stafford – seeking to grow the economy in the region by 50%, generating 50,000 new jobs between 2011 and 2021. The 2020-21 SSLEP delivery plan confirms that this ambitious target has been achieved, underlining the huge growth potential of the region.
- 3.10 Moving forward, Stafford is identified as a strategic priority as a "competitive urban centre" where it is envisaged to create *"the right mix of places that are attractive destinations to live, work and visit, underpinned by the right infrastructure⁷".* The SSLEP fully recognises the role of new homes in supporting the growth potential of the region – where providing the type, mix and quality of new homes is critical in underpinning the diversity and scale of economic growth envisaged in Stafford. The SEP recognises this: *"Housing investment and delivery is vital to the economic prosperity of Stoke-on-Trent and Staffordshire. Supporting investment and infrastructure, including HS2, is critical to ensuring that the area really benefits from national investment⁸".*
- 3.11 Simply put, a failure to provide suitable land for housing growth in the Local Plan will be a missed opportunity to capitalise on the once-in-a-generation growth potential of Stafford during the next Plan Period. A more ambitious housing target would ensure that this growth is realised and will catalyse the Borough's economy during the next 20 years.

b) Past Rates of Delivery

- 3.12 The EHDNA identifies that an average of 587dpa were delivered between 2001/02 and 2018/19, which includes a period of significant housing recession and exceeds the current target in the emerging Local Plan. Notwithstanding this, past trends also indicate that:

⁶ Constellation Partnership Growth Strategy (October 2018), p26

⁷ SSLEP Deliver Plan, p8

⁸ SEP (2018), p26

- Between 2001/02 and 2008/09 (pre-recession) an average of 661dpa were delivered; and
- In the last 4 reporting years (2015/16 to 2018/19) an average of 815dpa were delivered.

3.13 These trends suggest that there is significant demand and the potential for Stafford to continue to deliver higher levels of housing to meet this need – particularly in the context of the potential for catalytic growth over the next 20 years.

c) Affordable Housing Need

3.14 The EHDNA identifies an affordable housing need in the range between 252 and 389 affordable homes per annum between 2020 to 2040 for the Borough, which represents a significant proportion of the local housing need based on the standard method (408 dpa) and would require at least a 36% delivery rate even if the Regeneration PCU scenario of 711 dpa were pursued.

3.15 In addition, median affordability ratios (both residence and workplace-based) have generally increased over time, indicating worsening affordability⁹. Lower quartile ratios in Stafford are worse than median ratios, indicating that those on lower incomes may struggle to afford even lower priced properties.

3.16 In summary, if insufficient new homes are provided to meet increasing demand, then there is a risk that affordability levels will worsen for the next generation of residents in the Borough, and create significant negative social and economic outcomes. We consider that the evidence exists to support a more significant uplift in overall housing need to better address affordability and the delivery of new affordable homes during the next Plan Period.

Summary

3.17 In summary, Richborough consider that there are compelling reasons why a much higher housing need should be considered, based on the growth potential of the Borough, its past and current rates of delivery / jobs growth and a worsening affordability crisis. As such, we contend that **an annual housing need in excess of 746dpa should be considered**.

⁹ EHDNA, p120

The Settlement Strategy & Spatial Distribution

Settlement Hierarchy

3.18 **Policy 2 (Settlement Hierarchy)** sets out the Preferred Options proposed settlement hierarchy. Richborough's comments on the proposed settlement hierarchy are as follows:

- **Tier 1 and Tier 2** - Richborough supports the identification of Stafford (Tier 1) and Stone (Tier 2) at the top of the settlement hierarchy, which is in line with Government policy and reflects the size, scale and function of these settlements.
- **Tier 3** - Richborough strongly objects to the identification of Meecebrook Garden Community ("Meecebrook") as a stand-alone settlement at Tier 3 of the hierarchy. For the reasons set out in Section 4 of these Representations, we consider that Meecebrook is fundamentally unsustainable, unviable and undeliverable and, therefore, should be removed from the settlement hierarchy altogether.
- **Tier 4** - Richborough consider that larger settlements should form the 3rd tier of the settlement hierarchy, as opposed to Meecebrook.

Spatial Distribution

3.19 The Preferred Options identifies the spatial distribution of homes to meet its identified housing need across the Borough during the next Plan Period. Policy 1 (Development Strategy) sets out the broad distribution of housing supply across the Borough as follows:

- Stafford (59%).
- Meecebrook (24%).
- Stone (7%).
- Windfall (6%).
- Larger settlements (4%).
- Smaller settlements (<1%).
- Rural areas (<1%).

3.20 Just 7% of the Borough's housing supply is distributed to Stone, which comprises 243 completions (between 2020 and 2022), 268 commitments, and only 370 homes in new allocations. Stone is a Tier 2 settlement and, along with Stafford, is stated to be one of the Borough's main centres for employment and facilities and benefits from the most

extensive public transport service¹⁰. However, the current spatial strategy and distribution of new housing is not reflective of Stone's positioning in the settlement hierarchy or its strategic location and, instead, allocates a considerable proportion of new housing to Meecebrook. Therefore, Richborough consider that the spatial strategy and the distribution of new housing presents an imbalance, with Stone, as the second settlement in the hierarchy, having a significantly higher capacity for growth. Consequently, a more balanced spatial strategy should deliver a higher level of growth in Stone for the following reasons:

- **An inherent higher capacity for growth** – The Issues and Options stage of the Local Plan considered a higher level of strategic growth in Stone in all three growth scenarios. However, the Council's Interim Sustainability Appraisal ("SA"), prepared in 2022, only considers an even level of growth across all scenarios for Stone; being the delivery of 370 homes, which comprises the total of six allocations. As Stone is the second settlement in the settlement hierarchy, and as the Issues and Options identified a higher level of growth in all three scenarios assessed, Richborough consider that the SA should have considered higher growth options, and therefore has adequately considered reasonable alternatives – particularly to the allocation of Meecebrook. Richborough consider that Stone has a higher capacity for growth than the 370 dwellings that are proposed to be allocated, which should be considered in the SA as a Regulation 19 version of the plan is prepared.
- **To support vitality, vibrancy and viability** – to support growth and vitality and viability of the Borough's service centres, new residents and additional growth is required that allows them to evolve and meet their potential during the next Plan Period. Stone is a key service centre and market town which requires a level of growth which reflects its size, and which supports the residents and infrastructure that is require to support the vitality of Stone during the next Plan Period.
- **Meeting needs** – Richborough consider that there is a compelling case to adopt a more ambitious housing need target, of 746dpa or higher, to deliver Local Plan that grasps the opportunity that the next Plan Period presents – supporting the exceptional potential for growth in the Borough, reflecting the evidence of strong levels of past delivery and addressing affordability and affordable housing need. The growth of Stone and the delivery of the site provides an opportunity to support a balanced spatial

¹⁰ Preferred Options Local Plan, paragraph 1.11

strategy that will deliver logical and sustainable growth in a key growth location; and which will provide a more accessible and deliverable option than the inclusion of Meecebrook as part of the spatial strategy - which is fundamentally unsustainable, inaccessible and undeliverable.

Summary

- 3.21 In summary, Richborough make the following overarching comments on the Preferred Options proposed Development Strategy:
1. Richborough consider that **there is a compelling case to adopt a more ambitious housing need target, of 746dpa or higher**, to deliver Local Plan that grasps the opportunity that the next Plan Period presents – supporting the exceptional potential for growth, reflecting the evidence of past trends and addressing affordability and affordable housing need;
 2. Richborough **strongly objects to the identification of Meecebrook Garden Community as a stand-alone settlement at Tier 3 of the settlement hierarchy** – which is fundamentally unsustainable, unviable and undeliverable and, therefore, should be removed from the settlement hierarchy; and
 3. Richborough **supports the identification of Stone as a Tier 2 settlement**. However, there is an **imbalance in the spatial strategy and the distribution of new housing**. Richborough consider that Stone should accommodate a greater level of housing and additional growth to support a more balanced spatial distribution of housing and infrastructure.

4 STRATEGIC ALLOCATIONS

4.1 The Preferred Options proposes four major strategic site allocations, which will deliver 8,329 units, comprising:

- Meecebrook – 3,000 units;
- North of Stafford – 2,700 units;
- West of Stafford – 1,729 units; and,
- Stafford Station Gateway – 900 units.

4.2 Richborough consider that there are significant question marks over the deliverability of these allocations, particularly the Meecebrook Garden Community and the residential elements of the Stafford Station Gateway. Our overarching comments on these proposed allocations are provided as follows:

Meecebrook Garden Community

4.3 Richborough **strongly objects to the selection of Meecebrook as a feasible, realistic or deliverable strategic site.** It represents an isolated greenfield development that has been transformed from what was a partially brownfield development (on the site of the MOD Swynnerton Training Area) at the Issues and Options stage of the Local Plan, to an entirely greenfield development. Much of the SA's consideration of Meecebrook is predicated on the delivery of the extensive suite of infrastructure, not least a new rail station on the West Coast Mainline, which for the reasons set out in this response is neither feasible nor deliverable. As such, it is considered that the SA is flawed and should be revisited as the Regulation 19 stage of the Local Plan is prepared.

4.4 The following commentary sets out the key reasons why Meecebrook should be removed as an allocation and a more balanced spatial strategy, that directs additional growth into Stafford, Stone and the Borough's larger settlements, should be adopted.

Site Selection

4.5 Firstly, it is not clear how Meecebrook has been reduced/amended from a site with a large element of brownfield land (the MOD land) to a predominantly greenfield site – as the Local Plan has moved from Issues and Options stage to Preferred Options – without a full and transparent assessment of how this has impacted on the initial selection of the site. The change in the site parameters has also reduced the site capacity from 11,500 dwellings to 6,000 dwellings, which significantly undermines the case for major

infrastructure (such as the Rail Station) and reduces the significant benefits envisaged in the original Cold Meece 'Garden Village' proposals.

- 4.6 It appears that the main reason for the change in site area and strategy is land availability, with the SA stating that *"there are issues with regards to land availability, with extensive areas of land thought to be available at the time of the Issues and Options consultation (following a call for sites) now unavailable (specifically MOD land at Swynnerton Training Area, and farmland in the vicinity of Upper Heamies). This led the Council to undertake further work to explore land availability, following the Issues and Options consultation, which led to additional land being identified as available. The net effect is that the current site 'red line boundary' is shifted significantly to the west, in the direction of Eccleshall, relative to the assumed red line boundary at the time of the Issues and Options consultation¹¹".*
- 4.7 The SA goes on to acknowledge the risks and uncertainties associated with a 6,000 home scheme, stating that (Asteer **emphasis** added) *"Within this adjusted red-line boundary there is capacity for at least 6,000 homes, at which scale there would be the potential to deliver a range of strategic infrastructure, likely to include a train station (detailed feasibility work has been completed, but **there remain risks and uncertainties**). However, **a 6,000 home scheme could have drawbacks relative to a scheme of up to 11,500 homes, as previously envisaged¹²**".*
- 4.8 Richborough consider the assessment of the site in the SA and the site selection process to be fundamentally flawed, due to:
- No re-consideration of whether the site would be initially selected without brownfield land, or without initial Government funding to support a site that included the MOD land.
 - A predetermined approach in the SA that assumes that all infrastructure, including a rail station, will be delivered – despite the flagged risks and clear uncertainties. As set out below, we consider some of these elements of infrastructure, and therefore Meecebrook, to be undeliverable; and therefore a revision of the SA is required.

¹¹ Interim Sustainability Appraisal, p76

¹² Interim Sustainability Appraisal, p76

- A lack of full consideration of the dis-benefits of amending the site area in terms of no longer utilising brownfield land (in line with Government policy) and the real impact on benefits in reducing from a garden village (11,500 homes) to a garden community.

4.9 In summary, we consider that a pre-determined strategy, supported by initial Government funding, has led the Council to pursue Meecebrook; even as the initial benefits in terms of brownfield use and the scale of development, have been eroded.

Sustainability and Accessibility

- 4.10 Meecebrook represents an isolated and, without a new rail station, a wholly unsustainable location for growth. The SA fully recognises that in sustainability and accessibility terms, Meecebrook would not be deliverable without a new rail station on the West Coast Main Line, stating that (Asteer **emphasis** added): ***“should it be the case that delivery of a train station cannot be guaranteed, then the transport merits of the site decrease significantly. Staffordshire County Council stated clearly through the Issues and Options consultation (2020): A new Garden Community at Meecebrook would require a new rail station to prevent it from becoming a car dominated settlement¹³.”*** It also states that *“without a train station then the ‘transport’ merits of a 6,000 home scheme in this location are questionable, as links to higher order settlements would be far less strong (also an unmet needs consideration)¹⁴”*.
- 4.11 Also, Meecebrook was previously considered to require a new Junction on the M6 to provide adequate access to the strategic highways network, with the Council’s Strategic Development Site Options (2019) stating that a potential infrastructure requirement of the site was “a new junction on M6 with link to site”. This requirement is not considered in the Preferred Options and it is unclear what impact Meecebrook would have on the local road network without a suitable and direct access to the strategic highways network.
- 4.12 A set out below, it is considered that a new rail station at Meecebrook is not deliverable and, therefore, the development of the site would lead a an isolated, car borne development that is neither accessible nor sustainable.

¹³ Interim Sustainability Appraisal, p61

¹⁴ Interim Sustainability Appraisal, p100

New Rail Station Feasibility

- 4.13 A review of the new passenger rail station proposals for Meecebrook has been undertaken by Intermodality, a specialist transport consultancy, which is provided at **Appendix 3** of these Representations. This review provides a critique of the rail feasibility work undertaken by the Council to date¹⁵, and draws conclusions on the overall feasibility of delivering a new passenger rail station on the West Coast Main Line (“WCML”), which as set out previously, is critical to the delivery of a new Garden Community at Meecebrook.
- 4.14 Conclusions drawn by Intermodality identify significant issues and risks associated with the delivery of a new multi-platform rail station on the WCML, including:
- The intensity of current rail services on the WCML, the ‘Backbone of Britain’, the busiest mixed-use railway in Europe with a nationally-significant role for moving passengers and freight;
 - A series of major upgrades to the WCML have been undertaken in recent years to improve capability and reduce journey times, including a major grade-separated junction at Norton Bridge, but without any provision being made in the previous or current strategy for any new station at Meecebrook;
 - Engineering access on the WCML, which shuts either the fast or slow lines passing the site, would necessitate a 4-platform station to be constructed for network operational reasons, but which would not otherwise be justified commercially, adding substantially to the complexity, cost and risk of delivering the station, relative to the size of the adjacent development which would need to fund and sustain it;
 - Current signalling not being suitable in capacity or location to accommodate a new station, and as such adding to the complexity, cost and risk of delivering the project, in terms of new and altered signalling;
 - A new station would abstract demand and revenue from existing stations;
 - The need for the entire development to be completed (which might not occur for another 30 years) in order to generate sufficient critical mass of demand, with no

¹⁵ Including the Meecebrook Garden Community Transport Strategy, July 2020 (Atkins); Pre-Feasibility Report V0.1, March 2022 (SLC Rail); Feasibility Report v1.0, July 2022, updating work in the March 2022 report (SLC Rail).

indication in the reports on how / who would cover the financial losses in the intervening period;

- The ability to fund and deliver rail enhancements in the current climate, with SLC noting recently the impact of the COVID19 pandemic and its long term impact on working practices and passenger demand;
- The conclusion from Atkins that, even if the station were to be delivered, the development would still generate considerable levels of highway trips, requiring further mitigation measures;
- The conclusion of SLC that the station business case would achieve a BCR of 1.5, at the low end of the range for “medium” value for money.

4.15 Notwithstanding the fact that these are significant issues that in isolation undermine the feasibility and deliverability of a new station, it is also apparent that there has been complete lack of early (or any) engagement with the rail industry, especially with Network Rail as the licenced, regulated manager of the national rail network. This fundamentally undermines the deliverability of a new station and there can be no confidence that a new station is achievable in terms of delivery, technical/engineering feasibility or value for money; and therefore the delivery of Meecebrook is neither feasible nor sustainable.

Deliverability

4.16 Notwithstanding that we consider a new rail station to be unfeasible, as set out above, which would render Meecebrook fundamentally undeliverable and unsustainable; there are also significant infrastructure and other obligations that would need to be delivered to support a sustainable and liveable new community. These include (but are not limited to):

- A secondary school, primary schools and nursery provision;
- A health care facility with GP, dentist and pharmacy;
- A flexible, multi-purpose building for use by the community;
- Community hubs / facilities;
- A place of worship;
- Indoor and outdoor sport provision;

- Off-site highways infrastructure upgrades necessary to mitigate the impact of the development on the highway network; and
- The creation of new habitats for biodiversity, public open space and play space.

4.17 The delivery of this infrastructure and the required affordable housing provision would present significant challenges to delivering a new community based on overall viability. The SA states that (Asteer **emphasis added**) ***“Delivery risk at Meecebrook is a consideration, with the Viability Assessment (2022) concluding (assuming 40% affordable housing): “Meecebrook is marginally viable. Further discussions and engagement are needed with the identified landowners to solidify a red line boundary and manage expectations”¹⁶.*** The Council’s Viability Assessment (2022) states that for Meecebrook to viably deliver 40% affordable housing, it would *“need to forgo the provision of all M4(2) and M4(3) accessible housing, Net Zero extra over interim FHS Interim Uplift and provision of electric vehicle charge points”*. This would clearly be contrary to policy objectives and highlights the marginal viability of Meecebrook.

4.18 In addition, the site is in multiple landownerships and there are no agreements in place or clarity on the mechanisms for delivery. In terms of viability and deliverability, the Council’s Viability Assessment gives Meecebrook a red RAG rating, stating that (Asteer **emphasis added**) ***“Meecebrook is constrained by the lack of clarity around landowner commitment and the unknown costs of infrastructure. It is important that landowners engage continuously in this process and further work is undertaken regarding infrastructure requirements. If landowners are not ‘on board’, or their financial expectations quantified, the delivery of this scheme is at risk”¹⁷.***

Delivery

4.19 Richborough consider that the Council’s Housing Trajectory for Meecebrook, at Appendix 6 of the Preferred Options, is wholly unrealistic. It assumes that the scheme will deliver 300 units per annum, starting from 2030/2031 – totalling 3,000 units over the last 10 years of the Plan Period. We consider this to be wholly unrealistic for the following reasons:

- A Framework Masterplan Supplementary Planning Document must be put in place to understand the infrastructure requirements, phasing and constraints to development; as well as setting the design and development principles that would frame the garden

¹⁶ Interim Sustainability Appraisal, p67

¹⁷ Viability Assessment (2022), p86

community. In our experience, this could take 1-2 years to be adopted following approval of the Local Plan – which could mean that an SPD is not in place until 2026/27.

- Part L of Policy 7 (Meecebrook) states that *“development can only commence once a route to funding and delivery in line with the phasing set out in the Framework Masterplan Supplementary Planning Document has been identified for the railway station; primary and secondary schools; electricity, gas, clean and wastewater and on-site renewable energy systems; and any necessary strategic highways infrastructure upgrades”*. There is the potential for certainty in funding and delivery (notwithstanding that we consider the rail station to be undeliverable) to take a number of years, particularly given the complexity of delivering a new station on the West Coast Main Line; which will significantly impact on any lead-in times to development.
- Lichfields “Start-to-Finish” Report (2020) is a well-known industry barometer for understanding the lead in times to development. It estimates that sites of 2,000 units or more take an average of 8.4 years from the validation of the first planning application, to the delivery of the first dwelling. On this basis, if an application were validated now, it would be unlikely to be delivering homes in 2030/31 as set out in the Housing Trajectory.

4.20 Even taking the most optimistic scenario and assuming the new rail station is feasible, we consider that the delivery of Meecebrook would not be possible before the late 2030’s, based on:

- Local Plan adoption – end 2024 (LDS).
- Adoption / endorsement of the Meecebrook SPD – 2026/27.
- Possible timescale for clarity on rail funding and delivery – 2031/32 (c. 6 years post-adoption), followed by a significant lead-in to construction and delivery (realistically, this would be significantly longer, based on the lack of engagement with Network Rail).
- Validation of first application – 2031/32
- Delivery of first home – 2039/40.

4.21 Based on the above, even if Meecebrook is feasible and deliverable (which we do not consider to be the case), it is very unlikely to be delivering any units until the end of the Plan Period.

Environmental Impacts

4.22 Notwithstanding the fundamental issues with the feasibility and deliverability of Meecebrook, it also has the potential to have a significant environmental impact, due to the scale of development in a greenfield location which is isolated and has inherent environmental and physical constraints. These impacts have not yet been fully assessed or understood, but the Council's evidence base does acknowledge significant constraints that the delivery of Meecebrook would need to address – particularly due to the site area switching from a brownfield to greenfield development. Key issues include:

- **Biodiversity** – the Council's SA recognises the potential for the development of Meecebrook to impact on designed habitats, which has increased since the site boundary has been amended, noting that: *"there are wide-ranging considerations in respect of locally designated habitats (Sites of Biological Importance, SBIs) and non-designated 'priority habitats' (a national dataset is available, but is somewhat dated and low accuracy). This largely relates to the fact that development would be focused on the Meece Brook corridor, and the effect of shifting the site red-line boundary to the west and to the south, since the Issues and Options stage, is potentially to modestly increase the concern regarding impacts to the Meece Brook SBI..... the effect of moving the site boundary to the west is to increase concern regarding impacts to the sensitive Mill Meece area (specifically land west of the village of Millmeece, and west of the railway line).¹⁸"*
- **Heritage** – the Council's Strategic Development Site Options (2019) note that Meecebrook contains a number of listed buildings which would require their setting to be protected and enhanced. At this stage, there is limited information or assessment that considers the impact on historic assets, or how they would be fully protected and preserved.
- **Landscape impact** – the Council's 2021 Landscape Sensitivity Study, considered Meecebrook, but assessed the site which included the MOD land, which was considered to be less sensitive in landscape terms. The SA states that (Aster **emphasis** added) *"study was completed in 2021 to evaluate landscape sensitivity, which concluded 'medium' sensitivity overall. However, the study examined the site previously under consideration for 11,500 homes, to include the MOD land, which has relatively low landscape sensitivity. **Most of the land examined in 2021 that falls within the current***

¹⁸ Interim Sustainability Appraisal (2022), p46

site boundary was found to have 'medium / high' sensitivity overall¹⁹". This again demonstrates how the evidence base does not support the amended Meecebrook boundary, which will have significant biodiversity and landscape impacts. The development of the site also potentially risks coalescence between Yarnfield, Coldmeece and Sturbridge.

- 4.23 Overall, there is limited evidence base assessment work that has been undertaken to underpin or justify the Meecebrook allocation – particularly now the site boundary has been fundamentally altered to exclude the MOD land. Richborough consider that the site is likely to have very significant environmental impacts, when compared to alternative growth options.

Stafford Station Gateway

- 4.24 Whilst Richborough supports the delivery of the Stafford Station Gateway, as a predominantly brownfield site in a highly accessible location, there are concerns over the viability and deliverability of the proposed residential elements of the scheme. Our key concerns relate to:

- **Viability** – it is considered that further work is required to understand the viability of the Stafford Station Gateway, which is considered to be marginal. The SA states that (Asteer **emphasis** added) *"the range of issues and constraints affecting Stafford Station Gateway could indicate that affordable housing delivery may prove challenging. The Viability Study (2022) assumes 20% affordable housing, and concludes: **Station Gateway is marginally viable. The large number of landowners may lead to complexities with collaboration and equalisation agreements which puts the site at risk²⁰.**"* In addition, the Council's Viability Assessment gives Stafford Station Gateway a red RAG rating, stating that *"Station Gateway is constrained by the lack of clarity around infrastructure. It is important that further work is undertaken regarding infrastructure requirements so that we may accurately model the implication on viability²¹".*
- **Land Assembly** – as touched upon above, there is significant uncertainty around the complexity of landownerships in the gateway area. Land assembly and CPO would have a significant impact, not only on viability, but on the lead-in times and assumed rates of delivery.

¹⁹ Interim Sustainability Appraisal (2022), p94

²⁰ Interim Sustainability Appraisal (2022), p57

²¹ Viability Assessment (2022), p86

- **Delivery** – we consider that the Council’s Housing Trajectory for the Station Gateway, at Appendix 6 of the Preferred Options, is challenging. It assumes that units will be delivered on the site in 2028/2029 – just 3-4 years following the adoption of the Local Plan. Based on Lichfields “Start-to-Finish” Report (2020), sites of 500 units or more take an average of 5.0-8.4 years from the validation of the first planning application, to the delivery of the first dwelling. Factoring in the preparation of an application (and assuming that land ownership issues are resolved), this means that it is unlikely that any homes could be delivered before 2030/31 – 6 years post-adoption – in a best case scenario.

Summary

- 4.25 In summary **Richborough strongly objects to the identification and allocation of Meecebrook as a strategic site** – which has been selected based on a pre-determined site selection process; and which is fundamentally unsustainable, inaccessible and undeliverable. **Richborough also has some concerns over the viability and deliverability of the residential elements of the Stafford Station Gateway**, which has significant issues with land ownership and viability.
- 4.26 **Richborough considers that a more balanced spatial strategy could be achieved by removing the Meecebrook strategic allocation and delivering dispersed and sustainable growth across the Borough’s larger settlements.** A further assessment of the viability and deliverability of the Stafford Station Gateway proposals should be undertaken to confirm the level of development assumed can indeed be delivered within the time period envisaged.

5 SITE SELECTION & ALLOCATIONS

5.1 The Council sets out its site selection process, which underpins the Preferred Options draft site allocations, in the following evidence base documents:

- Site Selection Topic Paper (October 2022);
- Site Assessment Profiles (October 2022);
- Strategic Housing and Employment Land Availability Assessment (August 2022); and
- Stafford Borough Local Plan Interim Sustainability Appraisal (October 2022).

5.2 These Representations draw on these documents to make comment on the proposed site allocations and the site selection process – as it relates to Stone and, in particular, the Richborough’s site at land at Eccleshall Road.

Site Selection Methodology

5.3 The Council’s Site Selection Topic Paper sets out that 290 sites were assessed, based on the following methodology²²:

- *Stage 1: Sites with constraints rendering them non developable were rejected. If possible, site boundaries were adjusted to exclude constraints. 217 sites progressed to stage 2.*
- *Stage 2: Sites not within or adjacent to a settlement identified in the settlement hierarchy were rejected. 156 sites progressed to stage 3.*
- *Stage 3: Potential dwelling yield for each site is calculated, and site information is sent to external consultants and other consultees to form part of the local plan evidence base.*
- *Stage 4: Evidence-based decision to select or reject sites. 57 sites progressed beyond this stage.*

Site Assessment Profiles

5.4 The Council’s Site Assessment Profiles (2022), which support the Preferred Options, list the sites which passed Stage 2 of the site assessment process. Based on all the information provided, a decision was then made as to whether the site was suitable for

²² Site Selection Topic Paper (October 2022), p4

development with each site categorised into one of the following: proposed allocation, potential site option, and rejected site.

- 5.5 The site that is the subject of these Representations was assessed in the Site Assessment Profiles as part of a wider development parcel extending to 133.38 hectares (SHELAA ID Code: SRUR04) and was identified as having a potential yield of 2,801 dwellings. However, the Council's Site Assessment rejected SRUR04 as it was considered that the *"Site would require a significant amount of infrastructure, of particular importance would be the delivery of new schools which may not be feasible or viable."*
- 5.6 Although the site at Eccleshall Road formed part of SRUR04, it should be assessed as a standalone site based on the Vision Document contained as **Appendix 2**. In summary, it is important to note that this site:
- Is smaller in scale and forms a logical and natural extension to the western edge of the Stone urban area. The recent growth of Stone has been characterised by a westwards expansion with developments being brought forward by Anwyl, Taylor Wimpey and Persimmon on the western edge of the town – reinforcing the residential character of Stone's west and supporting it as an appropriate existing and future location for growth.
 - Is on the western edge of Stone, which will be fundamentally altered in character following the development of HS2, which will dissect the site and significantly alter the physical, visual and functional character of the countryside in this location. HS2 will effectively create a new permanently visual and physical boundary to the south and west of the site that will ensure that the impact of any development on wider open countryside is limited.
 - Is entirely within the control of Richborough and is, therefore, available. Furthermore, Richborough has a proven track record of facilitating the delivery of high-quality housing developments on suitable and sustainable sites and can confirm that the site can be delivered for housing in the Local Plan period.
 - Would be suitably accessed via a new junction from Eccleshall Road, would be future-proofed to retain the potential to link into any future expansion southwards to Stone Business Park and the A34 beyond; and, would offer opportunities to extend existing bus services within or adjacent to the site to increase access to public transport for existing and prospective residents.

- Has the opportunity to deliver a range of community and recreational benefits, which require further exploration but could include:
 - A new local centre / community hub which could provide ancillary retail provision and local community uses;
 - Land set aside for new community infrastructure (such as a primary school or other community use where there is a need identified through the Council's emerging Infrastructure Delivery Plan);
 - Possible new sports provision, including 3G pitches (which are identified in short supply in the IDP) and potentially grass football / rugby pitches;
 - A significant area of ecological enhancement and the potential to explore the possibility of a new Country Park to the west of the proposed line of HS2; and,
 - A concept design that accommodates areas of Green Infrastructure and play space.

5.7 Therefore, Richborough consider that the site should be reassessed as the spatial strategy and SA are developed and the Local Plan is progressed towards Regulation 19 stage. This should be considered in the context of Stone as a high capacity location for growth and the Borough's Tier 2 settlement, and in the context of Meecebrook being wholly undeliverable and unfeasible.

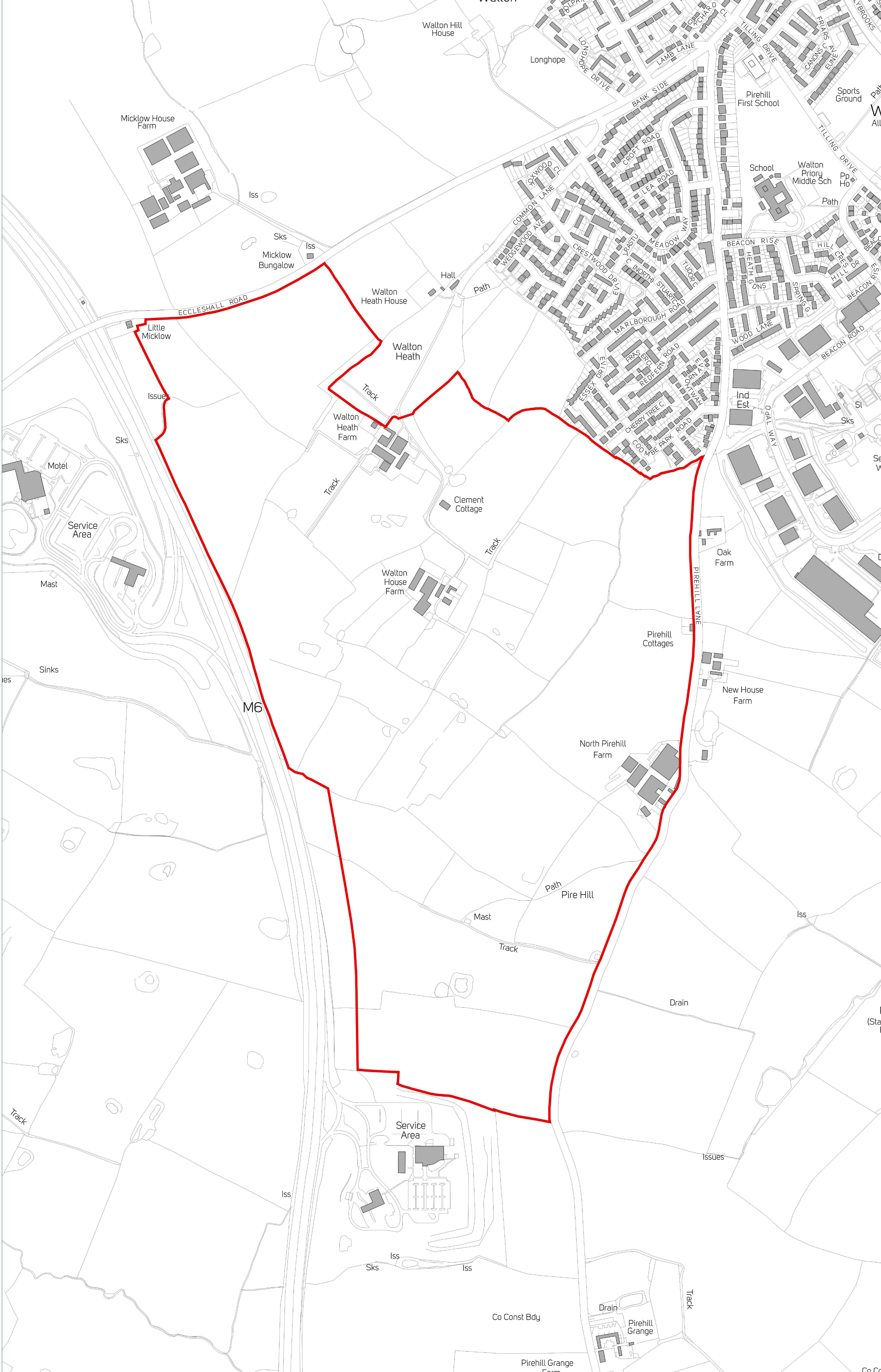
6 SUMMARY

6.1 This response has been prepared by Richborough to provide detailed comments on the vision, spatial strategy and key policies of the Preferred Options; and to demonstrate the availability, suitability and deliverability of the site at Eccleshall Road, Stone, to provide a high quality residential-led development as part of a balanced spatial strategy for Stafford – as demonstrated by the Vision Document at **Appendix 2**.

6.2 In summary, this response sets out that:

1. The Preferred Options proposed **Development Strategy** should be more ambitious and support a more balanced spatial strategy that:
 - a. Adopts a more ambitious housing need target, of 746dpa or higher, that supports the exceptional potential for growth in Stafford, reflects strong past trends in delivery and contributes to meeting the Borough affordable housing needs; and
 - b. Removes Meecebrook Garden Community as an allocation and stand-alone settlement at Tier 3 of the settlement hierarchy and takes a more balanced approach to the spatial strategy and the distribution of new housing, with Stone, as a Tier 2 settlement, having a higher capacity for growth.
2. The approach to **Strategic and Site Allocations** should be reconsidered as the Preferred Options Plan progresses to Regulation 19, including:
 - a. Removing Meecebrook as a strategic site – which has been selected based on a pre-determined site selection process; and which is fundamentally unsustainable, inaccessible and undeliverable (and which is predicated on a new WCML station that cannot feasibly be delivered);
 - b. Considering a more balanced spatial strategy, by removing the Meecebrook strategic allocation and delivering dispersed and sustainable growth to Stone, a Tier 2 settlement, and the Borough's larger settlements; and
 - c. Allocating land for new homes in Stone, as the second largest settlement in the Borough - ensuring that housing choice, vitality and affordability are not stifled; which would fail to meet the needs of the next generation of residents. Specifically, Land at Eccleshall Road, Stone should be allocated for residential-led development.

Appendix 1 - Site Location Plan



Appendix 2 – Vision Document



Land at Eccleshall Road Stone

Vision Document
Land at Eccleshall Road, Stone

December 2022

www.richboroughestates.co.uk

Land at Eccleshall Road, Stone

Vision Document

Land at Eccleshall Road, Stone

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1.

Introduction

1. Introduction

This Vision Document has been prepared by Richborough Estates Limited ("Richborough") to demonstrate the availability, suitability and deliverability of a strategic site at land at Eccleshall Road, Stone ("the site"). The site has the potential to deliver a significant urban extension to the west of Stone and to provide the type and quality of homes to meet the needs of Stafford Borough Council ("SBC" or "the Borough") over the next Plan Period.



The site represents a logical and appropriate extension to the west of the existing urban area of Stone, which is the second largest market town in the Borough. The site is sustainable, being easily accessible to a range of existing services and facilities, with Stone recognised in the emerging Local Plan as one of the Borough's main employment centres. The site provides an opportunity to deliver approximately 800 high quality family and affordable homes that meet the housing needs of the Borough and offer an opportunity to provide significant new community and recreational infrastructure in Stone. The site also offers the potential to deliver housing that meets excellent standards of sustainable construction and design, and provides an opportunity to support a considerable enhancement in biodiversity and multi-functional green infrastructure.

Purpose of the Development Statement Report

This Vision Document has been prepared by Richborough to demonstrate the suitability of the site at land at Eccleshall Road, Stone, for residential development and to set out the merits of allocating it as a development site in the emerging SBC Local Plan.

Content

This Vision Document has been prepared to demonstrate that the site is deliverable and entirely suitable for a residential development. In summary, this document includes:

- **Richborough's Track Record** - an introduction to Richborough and evidences the company's impressive track record in securing residential planning permission on suitable sites;
- **Site Context** - a summary of the site in context, including its wider strategic positioning and a description of the site and its surroundings;
- **Planning Policy Context** - a review of the planning policy context in the adopted and emerging Local Plan;

- **Technical and Environmental Considerations** - analysis of the key technical and environmental considerations that will influence the development of the site and which have informed the preparation of a Concept Masterplan; and,
- **Deliverability and Benefits** - a summary of the availability, suitability and achievability of the site, and an articulation of the key benefits that the allocation of the site would deliver.

Should any further information be required by the Council, Richborough and the appointed project team would be happy to address any queries or requests. Richborough is fully committed to undertaking further detailed design and technical work to support the evolution of an Illustrative Masterplan of the site as the Local Plan progresses through to Examination in Public.

2.

Richborough's Track Record

Residential Masterplan at Land Off Welham Lane, Great Bowden



Residential Masterplan at Matlock, Derbyshire



Residential Masterplan at Uplands Mill, Biddulph



2. Richborough's Track Record



Richborough is a privately owned land promotion company operating nationally. We work in partnership with landowners, councils and stakeholders to secure residential planning permission on suitable sites, which can then be sold to a development partner. The landowners we work with include private individuals, companies, charities, trusts and estates departments at public sector bodies, including councils. The sites we promote range in size, and include greenfield and brownfield land.

We are keen to work with all stakeholders. Our collaborative work and approach brings benefits to many of the main parties involved, including the local community. Councils can rely on our team's technical expertise and experience as we demonstrate sites are acceptable in planning terms and can deliver local policy aspirations and local benefits.

We are strong advocates of a plan-led system and are committed to promoting land for residential development by engaging actively with local authorities, parish councils and other neighbourhood forums through local and neighbourhood plans.

We currently have around 150 active projects across the country and if all of these sites come forward they would contribute around 32,000 new homes and would play a significant role in ensuring a continued supply of new homes across England and Wales.

In respect of the delivery of an allocated site, at Richborough we will identify a housebuilder partner in advance of outline planning permission and once a local plan has made significant progress we will engage in pre-application discussions with the local planning authority. Furthermore we often commence the process of discharging pre-commencement conditions ourselves to facilitate the implementation of a scheme and enable the housebuilder to get on site quickly. On average our sites that have built out achieve 50 dwellings per annum.

We work with a range of housebuilders all offering different housing products. The housebuilders who have built out our sites include Barratt Homes, Bellway Homes, Bovis Homes, Cala Homes, David Wilson Homes, Kier, Lioncourt Homes, Miller Homes, Mulberry Homes and William Davis Homes.

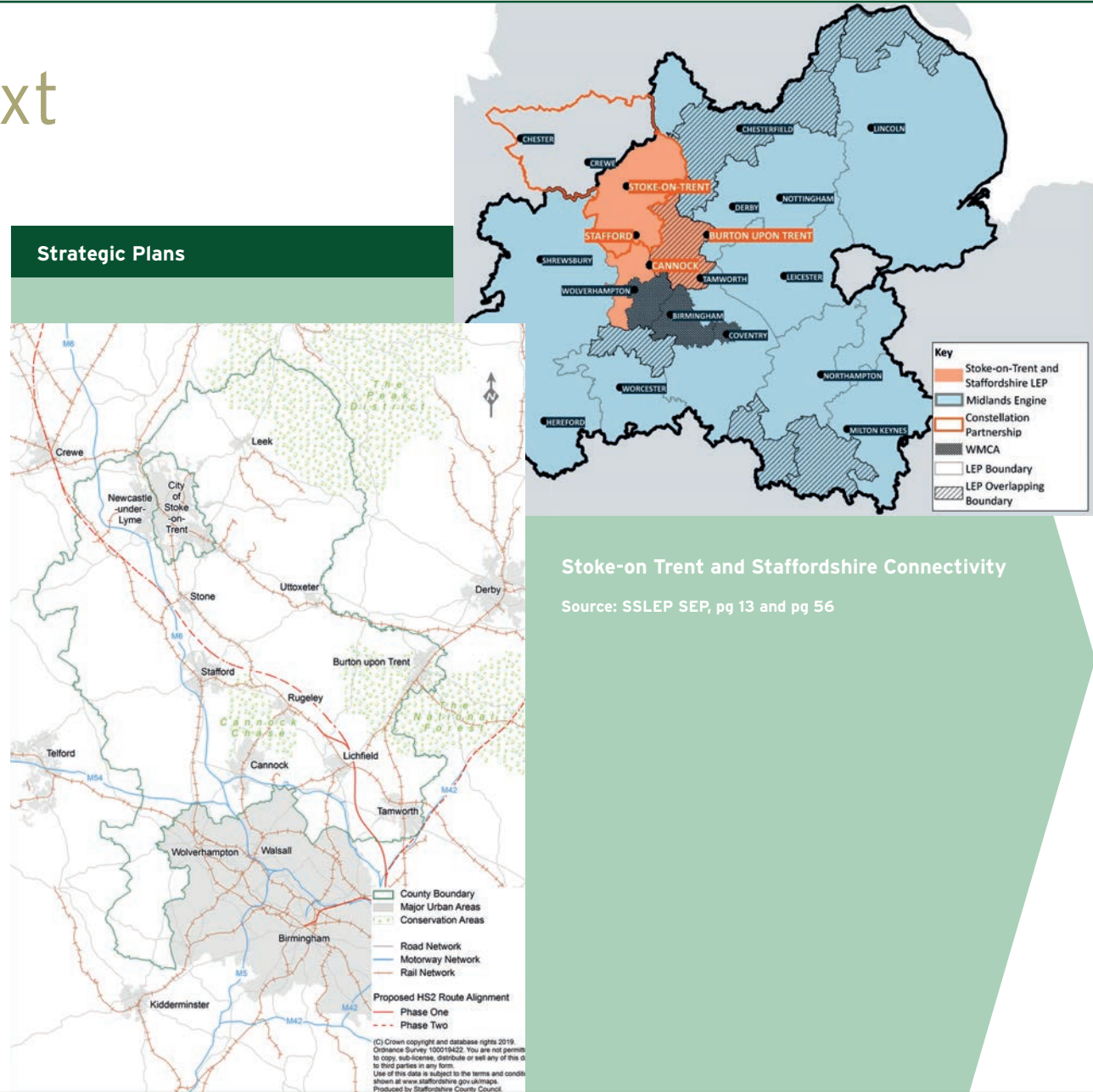
3.

The Site in Context

3. The Site in Context

The site sits within Staffordshire, a county at the heart of the country, which, owing to its location and excellent road and rail connections, is exceptionally well placed to catalyse wider regional growth, particularly in the context of HS2. The site is situated to the west of Stone, one of the Borough's main employment centres, and has easy access to the Borough's major road network, including the A34 and the M6. It provides an exceptional opportunity to support the growth aspirations of the Borough, County, and the Stoke-on-Trent and Staffordshire region by providing the type and quality of homes and community infrastructure to support future growth.

The site extends to approximately 125 hectares and comprises an irregular shaped parcel of land situated to the west of Stone, one of the Borough's main towns. It has excellent transport connectivity, with regular bus services and Stone Railway Station within close proximity to the site, and benefits from easy access to a number of existing services and facilities in Stone.



Strategic Context

Staffordshire is strategically located at the heart of the country, situated between Manchester to the north and Birmingham to the south. The county's geography, coupled with its excellent road and rail links, means that it is exceptionally well positioned to act as a catalyst for wider regional growth, which capitalises on its locational advantage and will be further bolstered by HS2, which will allow travel between Stafford and London Euston in just 55 minutes.

The arrival of HS2 in Stafford presents huge opportunities for the town, not only in the Stafford Gateway and the Town, but across the Borough and in Stone, as a significant location for growth in the Borough's settlement hierarchy. A failure to provide the type and quality of homes and infrastructure to support the arrival of HS2 would be a major missed opportunity to set the platform to catalyse the future growth of the Borough for the next generation.

The Constellation Partnership, an alliance of 7 Local Authorities across Staffordshire and Cheshire¹, prepared a Growth Strategy in 2018 which sought to deliver transformational economic growth, supported by the arrival of HS2, with accelerated growth envisaged across the region by 2040². The overarching Growth Strategy of the Constellation Partnership sought to support the delivery of at least 120,000 new jobs, 100,000 new homes and £6 bn per year of Gross Value Added ("GVA") by 2040 across the partnership area.

The Constellation Partnership Growth Strategy advocates for 'accelerated' housing delivery, over and above existing trends, stating that the area should deliver "at least 100,000 new homes, by accelerating the delivery of the 77,000 homes identified within Local Plans, on a series of key strategic sites which align with our objective of securing 'good growth', ensuring that the supply of housing delivers a broad range of new homes that are affordable and accessible to people where they need or choose to be"³.

Further to the above, the Stoke-on-Trent and Staffordshire Strategic Economic Plan ("SEP") (April 2018) recognises the need to provide the quantity, type and quality of housing required to underpin economic prosperity and attract and retain graduates and skilled employees. The SEP acknowledges the enormous growth potential of the region, including Stafford - seeking to grow the economy in the region by 50%, generating 50,000 new jobs between 2011 and 2021. The 2020-21 SSLEP delivery plan confirms that this ambitious target was achieved, underlining the huge growth potential of the region. With regard to Stone, the SEP recognises Stone Business Park as being a key employment site for digital businesses, and emphasises the importance of having a strong digital economy, which is stated to benefit the region's growth ambitions and targeted sectors.

1. Including Stafford, Staffordshire, Newcastle-under-Lyme, Stoke-on-Trent, Staffordshire Moorlands, Cheshire East and Cheshire West and Chester.
2. Constellation Partnership Growth Strategy (October 2018)
3. Constellation Partnership Growth Strategy (October 2018), p.26

The site is within close proximity to Stone Business Park and has easy access to the Borough's major road network, with the A34 providing direct access to Stafford to the south and to the M6, which connects cities including Stoke-on-Trent, Wolverhampton, Birmingham and Coventry. The site is also within close proximity to Stone railway station, which is located approximately 2.5km from the site, which provides connections to destinations such as Stoke-on-Trent, Crewe, Birmingham New Street, and Wolverhampton.

The site provides an exceptional opportunity to support the growth aspirations of the Borough, County, and the Stoke-on-Trent and Staffordshire region by providing the type and quality of homes and community infrastructure to support this future growth. Therefore, it is essential that the Local Plan is not considered in isolation, but in the context of these regional growth objectives and in a wider regional context in order to unlock the potential of the Borough.

The Site & Surroundings

The site extends to approximately 125 hectares in total and is situated to the west of Stone, which is one of the Borough's main towns and key employment centres.

The site is characterised by an irregular shaped parcel of predominantly greenfield land. However, the site also includes some existing development, including three farm holdings and several dwellings. The site is gently sloping, peaking at Pire Hill to the south. One Public Right of Way (Reference: Stone Rural 32) crosses the site from Sweepers Avenue to the north-east and runs parallel to the M6 to the west of the site.

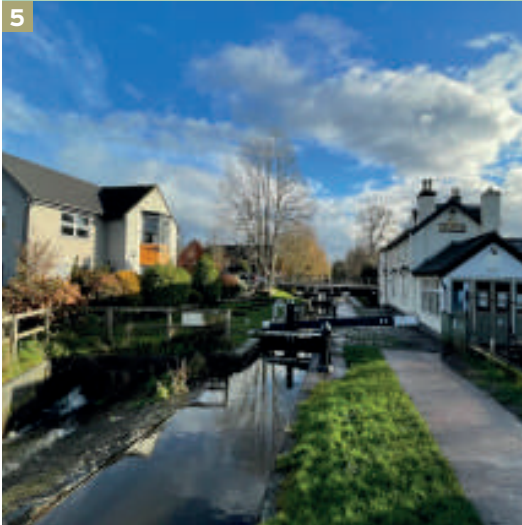
The site is bound to the north by Eccleshall Road, adjacent to which are existing developments by Persimmon Homes (LPA reference: 17/27052/REM, 19/30440/REM and 20/32249/FUL) and Anywl Homes (LPA reference: 18/28191/REM), which comprise the allocated Stone Strategic Development Location. A draft residential allocation in the Preferred Options Local Plan (Reference: ST007 - Land at Marlborough Road) is also situated to the north of the site and is proposed to be allocated for 101 units (4.79ha).

To the north-east of the site is a development of 92 dwellings, which was constructed by Taylor Wimpey (LPA reference: 15/22862/REM) and is within the settlement of Stone. Adjacent to the east of the site is Pirehill Lane, beyond which is Stone Business Park, agricultural land and several farm holdings. To the south of the site is a Service Station, which is situated off the M6 Southbound (Junction 14/15). To the south-west of the site, the line of HS2 will dissect the existing land ownership to the east of the M6, which will fundamentally alter the character of the countryside on the western edge of Stone. To the west of the site is the M6.

1. View towards the centre of the site from Common Lane
2. View south from Eccleshall Road
3. View west from Pirehill Lane
4. View south from Cherry Tree Close



- 5. Stafford Borough Council, 2022
- 6. Residential development to the north of the site
- 7. Stone Business Park
- 8. Residential development fronting Eccleshall Road



Accessibility

The site is in an accessible and sustainable location, within walking distance of a number of existing services and facilities, including:

- **Schools.** Pirehill First School (1.6km) and Walton Priory Middle School (1.1km) lie within a reasonably short walk from the centre of the site. A pre-school nursery is also located within close proximity (1.7km) to the centre of the site.
- **Employment.** Significant existing employment opportunities are located to the immediate east of the site at Stone Business Park, which provides a wide range of employers and employment opportunities.

- **Retail.** The centre of the site is within close proximity to the Premier outlet on Pirehill Lane (1.0km), which is situated within a local shopping centre; the Co-op store on Eccleshall Road (1.6km); and, the ALDI store on the A34 (2.0km), which can be accessed by foot or cycle via the adjacent residential estate. Further retail opportunities, health outlets, and other services are available within the main central area of Stone within 1.5km from the northern edge of the site.

In terms of accessibility to sustainable travel opportunities, bus services 101 The Knotty and 102/102A/103 operate from Tilling Drive and Myatt Avenue, respectively. The 101 service operates half-hourly during the day between Hanley and Stafford with additional peak hour services. Services run early morning and into the evening. The 102 service is a circular service operating hourly between Stone-Walton-Swynnerton-Yarnfield-Stone. Service 103 provides a two-hourly weekday service between Eccleshall and Stone.

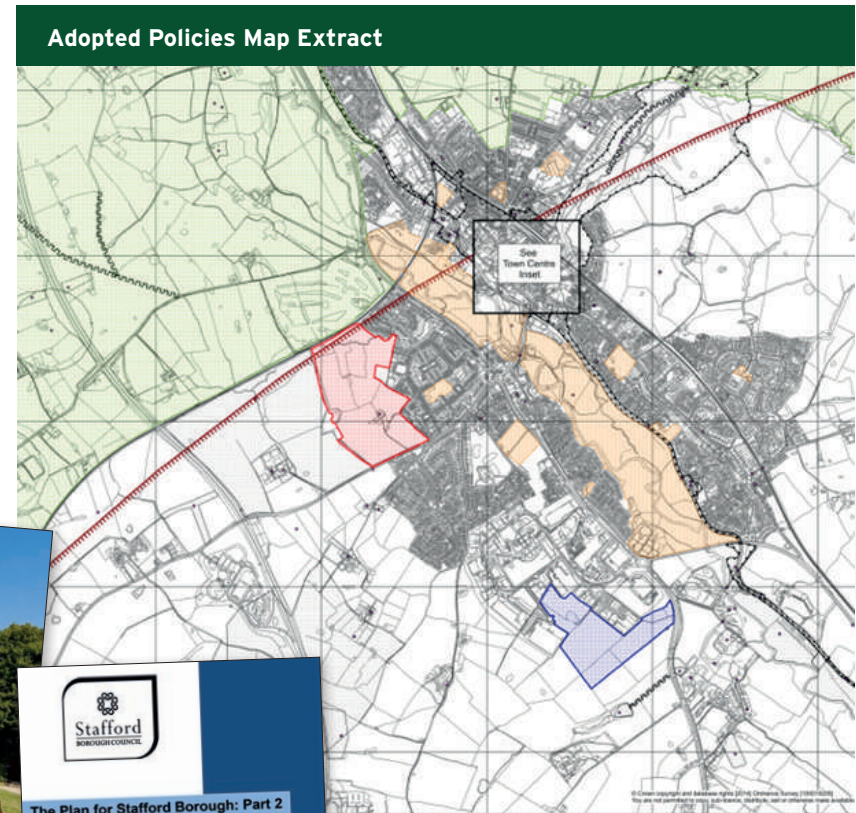
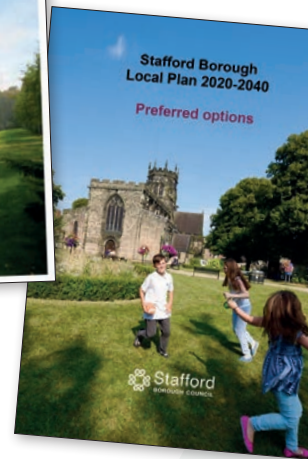
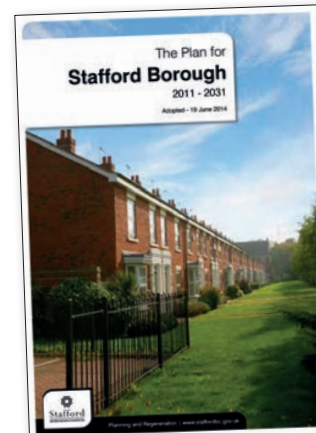
Further to the above, Stone railway station lies approximately 2.5km from the site. The station is within a comfortable cycling distance of the site and cycle parking is offered at the station.

4.

Planning Policy Position

4. Planning Policy Position

The emerging Stafford Borough Local Plan offers an opportunity for the Borough to plan its future growth in locations that are sustainable and which complement its overarching spatial strategy. Stone is identified as being a Tier 2 settlement within the emerging settlement hierarchy and is identified as a location, alongside Stafford, within which new housing development is to be focused. It is critical to deliver a new Local Plan and sound spatial strategy that responds to the needs of the Borough and adequately puts a robust framework in place that delivers the right mix, type and tenure of homes to meet existing need and to support the growth trajectory of the Borough over the next Plan Period.



Adopted Development Plan

The current Development Plan for Stafford Borough comprises The Plan for Stafford Borough (adopted June 2014) and The Plan for Stafford Borough - Part 2 (adopted January 2017). Several Neighbourhood Plans also form part of Stafford Borough's adopted Development Plan, including the Stone Neighbourhood Plan, which was 'made' on 20th July 2021. The site sits outside of the settlement boundary and is, thus, within the open countryside, according to the adopted Policies Map.

Emerging Local Plan

SBC is now consulting on the Local Plan 2020-2040 Preferred Options Document, which seeks views on draft policies and proposals for new development across Stafford Borough over the next 20 years. The consultation runs until 12th December 2022. The new Stafford Borough Local Plan will replace the Plan for Stafford Borough 2011-2031 and Part 2 of the Plan for Stafford Borough.

Richborough has made detailed representations to the emerging Local Plan in relation to Land at Eccleshall Road, Stone, which should be read in conjunction with this Vision Document.

The Case for Allocation

The site offers the potential to deliver a logical and sustainable extension to the west of Stone, as a focus for growth in the Borough's settlement hierarchy, and provides an opportunity to deliver high quality family and affordable homes, alongside new community infrastructure, to meet the housing needs of the Borough.

The site's development for housing would build upon the established residential character of the area, reinforced by new developments in the locality that have recently been brought forward by Persimmon Homes, Anwyll Homes and Taylor Wimpey, in addition to the Proposed Housing Site Allocation (Reference: STO07), which is adjacent to the north-east of the site. Nevertheless, the site's development must be seen not only in the context of the existing and emerging residential development within the area, but also in the context of HS2, which will create a significant alteration to the countryside to the east of the M6 motorway that will considerably change the character/function of the open countryside to the west of the town.

Consequently, the site presents an excellent opportunity for sustainable development adjacent to the urban area of Stone and, therefore, there is a strong case for the site's allocation and subsequent development for residential use during the next Plan Period. The remainder of this section provides a summary of the reasons why, in policy terms, there is a case for allocating the site for residential development.

Supporting a Balanced Spatial Strategy

Richborough supports the identification of Stafford (Tier 1) and Stone (Tier 2) at the top of the settlement hierarchy, which is in line with Government policy and reflects the size, scale and function of these settlements.

However, just 7% of the Borough's housing supply is proposed to be distributed to Stone, which does not reflect its status as one of the Borough's main centres for employment and facilities, with excellent strategic transport links. A more balanced spatial strategy should better reflect Stone's position in the settlement hierarchy, rather than allocating a considerable proportion of new housing to Meecebrook, which is both unsustainable and inaccessible. Stone has a significant capacity for growth and the allocation of the site would better reflect this; delivering a more appropriate strategy and spatial distribution of the Borough's growth.

A Logical Extension to Stone

The site forms a logical and natural extension to the western edge of the Stone urban area. The recent growth of Stone has been characterised by a westwards expansion with developments being brought forward by Anwyl, Taylor Wimpey and Persimmon on the western edge of the town - reinforcing the residential character to the west of Stone and supporting it as an appropriate existing and future location for growth. Moreover, the western edge of Stone, and the site, will be fundamentally altered following the development of HS2, which will dissect the site and significantly alter the physical, visual and functional character of the countryside in this location. The site itself will be dissected by HS2, effectively creating new permanently visual and physical boundary to the south and west of the site that will ensure that the impact of any development on wider open countryside is limited.

Meeting Housing Needs & Supporting the Exceptional Growth Potential of the Borough

As set out in its parallel Representations, Richborough consider that there is a compelling case to adopt a more ambitious housing need target, of 746dpa or higher, to deliver Local Plan that grasps the opportunity that the next Plan Period presents - supporting the exceptional potential for growth in the Borough, reflecting the evidence of strong levels of past delivery and addressing affordability and affordable housing need. The site provides an opportunity to support a balanced spatial strategy that will deliver logical and sustainable growth in a key growth location; and which will provide a more accessible and deliverable option that the inclusion of Meecebrook as part of the spatial strategy - which is fundamentally unsustainable, inaccessible and undeliverable.

Providing Housing Quality, Mix and a Diversity of Homes

It is critical that the Council provides not only the quantum of housing to meet its needs; but the mix, type and quality of housing in the locations that will support the growth of the Borough. In this context, it is particularly crucial to provide the type and quality of housing in locations that will support the Borough's rural service centres and ensure that housing choice is provided for the next generation during the Plan Period.

Affordable Housing and Supporting Affordability

The EHDNA has identified significant affordability issues in the Borough (with demand exceeding supply) and a need for between 252 and 389 affordable homes per annum between 2020 to 2040. The site has the potential to support the delivery of affordable homes in a sustainable urban location, which will support the Council's supply of affordable housing during the Plan Period.

Delivering Significant Public Benefits

The site offers an exceptional opportunity to deliver significant public benefits that meet an identified need. As illustrated by the Concept Masterplan in Section 6 of this Vision Document, the site has the opportunity to deliver a range of community and recreational benefits, including:

- A new local centre / community hub which could provide ancillary retail provision and local community uses;
- Land set aside for new community infrastructure such as a primary school or other community use where there is a need identified through the Council's emerging Infrastructure Delivery Plan ("IDP");
- New sports provision, including 3G pitches (which are identified in short supply in the IDP) and grass football / rugby pitches;
- A significant area of ecological enhancement and the potential for a new Country Park to the west of the proposed line of HS2; and,
- A concept design that accommodates areas of Green Infrastructure and play space.

A Deliverable Site

As demonstrated in the subsequent section of this Vision Document, the site does not have any technical or environmental constraints that would prevent a sensitive residential development being brought forward at the site.

Summary

In summary, there is a strong case for the allocation of the site in the emerging Local Plan. It has been demonstrated that there are compelling reasons why a much higher housing need should be considered, based on the growth potential of the Borough, its past and current rates of delivery / jobs growth and a worsening affordability crisis. As such, annual housing need in excess of 746dpa should be considered. The site would make a considerable contribution towards meeting the Borough's housing needs through the delivery of a logical and sustainable extension to the west of Stone, the second settlement in the Borough's settlement hierarchy. The following section considers the specific technical and environmental considerations that will influence the development of the site.

5.

Technical and Environmental Considerations

5. Technical and Environmental Considerations

The design evolution of the site has been underpinned by technical analysis that has considered any site opportunities and constraints. The Concept Masterplan demonstrates that a residential development could be sensitively brought forward that responds to the site's characteristics and respects the character of the surrounding area.

This section sets out our understanding of the environmental and technical considerations, and serves as a framework for more detailed design and technical assessment work as the Local Plan is progressed towards Examination in Public.

Highways and Access

It is envisaged that primary vehicle access to the residential development would be via a new junction from Eccleshall Road, which is proposed to take the form of a roundabout. The link from the roundabout would continue in the form of a spine road with looped access roads from it to provide more than one access route and a high degree of accessibility to the proposed dwellings. The design of the development would be future-proofed to retain the potential to link into any future expansion southwards to Stone Business Park and the A34 beyond.

Eccleshall Road is the B5026, a single carriageway road that provides a link between Eccleshall to the west and Stone to the east.

The development will be designed to be pedestrian and cycle friendly, incorporating suitable footways and cycleways as appropriate. Although alternative pedestrian / cycleway connections are available towards Walton / Stone via Common Lane and Pirehill Lane, it is noted that there is no footway available on the southern side of Eccleshall Road. Richborough intends to investigate the potential for provision of a footway to link from the site access towards the existing footway provision to the east.

Furthermore, the development of the site offers opportunities to extend existing bus services within or adjacent to the site to increase access to public transport for existing and prospective residents. Nevertheless, further technical work will be undertaken as the Local Plan progresses to ensure that the proposed site layout is designed to encourage walking and cycling, facilitate easy pedestrian and cycle connections and create links to the existing public transport network where possible.

Landscape

The site is within 15km of a Special Area of Conservation (“SAC”) (Cannock Chase). The site is not identified as a Site of Special Scientific Interest (“SSSI”), but it is within an SSSI Impact Risk Zone. The site is not within an Area of Outstanding Natural Beauty (“AONB”).

Although the site is situated within the open countryside, the surrounding area is already considerably urban in nature, with the M6 motorway running parallel to the western extent of the site forming a physical and defensible boundary to more rural environs beyond. Moreover, a number of housing developments have recently been delivered to the north and east of the site, which have extended the built-up area of Stone, and have added to the increasingly residential nature of this part of the Borough. Additionally, as detailed in the preceding sections of this Vision Document, the character of the site’s surroundings will be undergoing further considerable change owing to the arrival of HS2 and the urbanising effect that this significant piece of infrastructure will have on the locality.

Consequently, the delivery of an effective and sensitive landscaping scheme at the site would ensure that a proposed housing development would sit comfortably in its increasingly urban surroundings and protect the residential amenity of existing and prospective occupiers. Further detailed and updated landscape and visual assessment work will be undertaken, as the Local Plan is progressed.

1. Residential development along Eccleshall Road
2. Residential development off Eccleshall Road
3. Stone Business Park



Heritage

The site is not located within a Conservation Area and there are no statutory listed buildings within the curtilage of the site. The closest listed buildings are located to the east of the site, beyond the A34. Furthermore, according to the adopted Local Plan, “areas identified as having the least impact upon the historic environment mostly lie to the west of the town”¹.

There are areas within the Historic Environment Record (“HER”) that lie to the west of Stone and, whilst these are not statutory heritage assets, further assessment of heritage and archaeology will be undertaken as the Local Plan is progressed and a more detailed Masterplan for the site is prepared.

Ground Conditions

A Phase 1 site investigation assessment will be undertaken in due course; however, due to the longstanding agricultural use of the site it is not anticipated that, subject to further intrusive assessment at the detailed design stage and suitable mitigation, there are any significant constraints to development with respect to contamination or ground conditions.

Ecology and Trees

Ecology

The site does not contain any statutory habitats and it is not considered that there are any ecological constraints that would prevent the site from being developed for housing, subject to suitable mitigation and associated ecological enhancement. However, a suite of ecological surveys will be undertaken as the Local Plan progresses and any necessary mitigation will be incorporated into the scheme. It is anticipated that the site will deliver a Biodiversity Net Gain (“BNG”) in accordance with emerging Government legislation - with an opportunity to deliver BNG significantly in excess of 10% based on the potential to deliver significant areas of ecological enhancement.

Trees

An assessment of the quality of the existing vegetation on the site will be undertaken as the Local Plan progresses. Any proposal for the redevelopment of the site will seek to ensure that high quality trees and hedgerow are retained and incorporated as part of the development.

¹ The Plan for Stafford Borough, p.63



Utilities & Infrastructure

The site is situated to the west of the built-up area of Stone. Therefore, it is anticipated that appropriate services including electricity, water and broadband will be available.

As more detailed plans for the site are developed and as the Local Plan is progressed, more detailed technical work will be undertaken to assess the utilities capacity of the proposed development. However, it is not anticipated that there are any significant utilities infrastructure constraints that would prevent the site coming forward for development.

Public Rights of Way

One Public Right of Way (Reference: Stone Rural 32) crosses the site from Sweepers Avenue to the north-east and runs parallel to the M6 to the west of the site.

The Concept Masterplan has been designed to ensure that the Public Right of Way is retained as part of the future development of the site. It is envisaged that the dwellings proposed would be oriented to provide natural surveillance to, and overlooking of, the public rights of way.

Air Quality & Noise

The site is not within an Air Quality Management Area ("AQMA"). Although the site is adjacent to the M6, a scheme design would be sensitively developed to ensure that any adverse effects in relation to air quality and noise could be mitigated.

Further noise and air quality assessment will be undertaken as detailed plans for the site are developed; however, there are not considered to be any air quality or noise constraints that would prevent the development of the site for residential use.



Sustainability & Energy

The emerging Local Plan and Preferred Options propose a strategic focus on mitigating the impact of climate change. The Local Plan vision seeks to “Contribute to Stafford Borough being net zero carbon by ensuring that development mitigates and adapts to climate change and is future proof”. Policy 4 of the Preferred Options seeks to promote a net zero operational target for residential development and requires new proposals to demonstrate that all resources are used efficiently, as part of the construction and operation of new buildings - with all major developments demonstrating how embodied emissions have been taken into consideration through the production of an embodied carbon assessment. In addition, the Council declared a Climate Emergency in July 2019, seeking to achieve carbon neutrality by 2040.

Richborough is committed to responding proactively and robustly in addressing and mitigating the adverse impacts of climate change and is fully supportive of the UK Government’s targets for reductions in greenhouse gas emissions. Richborough will seek to design a development that has holistic low energy, passive design concepts involving a fabric first approach and high emphasis on energy efficiency. The proposed development would seek to achieve a status of low carbon, carbon neutral and zero carbon ready by design status by obtaining energy from renewable sources and paying close attention to reducing its potential embodied carbon to the highest extent possible.

Agricultural Land

According to the Agricultural Land Classification (“ALC”) Map for the West Midlands Region (ALC004), the site is predominately identified as comprising ‘Good to Moderate’ agricultural land. A small proportion of the site (areas at the north-western site corner and adjacent to the A34 to the east) is identified as ‘Very Good’ agricultural land. The site is adjacent to ‘Land predominately in urban use’ to the north-east.

A more detailed assessment of the agricultural land quality would be undertaken as detailed plans are progressed; however, it is not considered that the agricultural quality of the land would prevent the site being brought forward for development.



6.

Concept Masterplan

6. Concept Masterplan

The site offers an excellent opportunity to deliver approximately 800 high quality family and affordable homes, as well as a local centre and significant community infrastructure, as part of a logical and appropriate extension to the existing built-up area of Stone. The site will provide a choice of housing to meet the needs of the Borough, whilst also delivering a development that respects and enhances the site's environmental assets and the setting of the adjacent countryside.

A combination of best practice design guidance and site assessment have been used to establish the following broad design principles illustrated in the Concept Masterplan:

- Primary vehicular access from Eccleshall Road in the form of a new roundabout access, which will utilise a looped access configuration within the site to provide more than one access route, and a high degree of accessibility to the proposed dwellings. The site would also be designed to retain the potential for a future connection through any expansion of Stone Business Park to the east (and the A34 beyond).
- Opportunities for multi-modal trips will be maximised by providing a network of proposed footpaths / cycleways through the site, connecting to existing services and facilities, Stone Business Park and a potential Country Park to the south of the site.
- A landscape-led approach seeks to retain existing landscape elements such as trees, hedgerows and ponds, and integrate these into a new and diverse multi-functional Green Infrastructure.
- Significant biodiversity enhancements / corridors would be established throughout the site.
- An appropriate buffer / setback to HS2 and a development that respects its local character and provides a logical and natural extension to the expansion of Stone westwards - between Stone and the proposed line of HS2.
- A new local centre and community hub at the heart of the site, to provide a local amenity and a significant area of land to accommodate a community hub that could meet identified needs (such as a primary school or other community use where there is a need identified through the Council's emerging IDP).
- Potential land to accommodate new sports provision, such as 3G pitches or grass pitches, where there is an identified need.
- The potential for a significant area of ecological enhancement or a new Country Park to the west of the proposed line of HS2, which could be accessible from the north (Eccleshall Road) south (Pirehill Lane) and provide major recreational benefits for the wider settlement.

7.

Deliverability and Key Benefits

7. Deliverability and Key Benefits

Land at Eccleshall Road, Stone, offers an opportunity to bring forward a deliverable, logical and appropriate extension to the west of the existing urban area of Stone. The site's development will support approximately 800 homes alongside new community infrastructure and amenities; and deliver a range of economic, social and environmental benefits.

The site is in a highly accessible location that will support a sustainable pattern of development to the west of Stone, which is identified as the second settlement within the Borough's settlement hierarchy. This section provides a summary of the deliverability of the site and an assessment of the key benefits that allocating the site for development would bring to Stone and the Borough.



A Deliverable Site

The NPPF seeks to ensure that deliverable sites are provided in appropriate locations to meet housing needs and support economic growth. To be considered deliverable, sites should be available, suitable and achievable and should be available to be brought forward within a realistic timeframe once the Local Plan is adopted.

Richborough is fully committed to the site and considers that it could be brought forward immediately on adoption of the Local Plan to meet the housing needs of the Borough. In summary the site is:

- **Available**
- **Suitable**
- **Achievable**

Available

- Richborough has entered into an agreement with the landowner to promote the site for residential development. Richborough has a proven track record of facilitating the delivery of high-quality housing developments on suitable and sustainable sites and can confirm that the site can be delivered for housing within the early phases of the Local Plan period. Richborough are strong advocates of a plan-led system and are committed to promoting land for residential development by engaging actively with local authorities, parish councils and other neighbourhood forums through local and neighbourhood plans.

Suitable

The site is entirely suitable for a residential development for the following reasons:

- It offers a highly accessible and sustainable location for development adjacent to the urban area of Stone, a Tier 2 settlement, and can be brought forward early in the Plan Period following any allocation.
- It is a logical and natural extension to Stone that is not within the Green Belt.
- Work undertaken to date has indicated that there are no initial environmental or technical constraints that are considered to prevent the development of the site.
- It can deliver satisfactory vehicular access and has access to the strategic highway network via Eccleshall Road and the A34.

Achievable

- The Concept Masterplan demonstrates how the site responds to its physical characteristics and surrounding context by providing a sensitive landscape-led scheme. An assessment of the site constraints illustrates that delivery of the entire site is achievable, and a professional team of technical experts will support the detailed design of the site moving forward. Richborough has reviewed the economic viability of the scheme in terms of the land value, attractiveness of the locality, level of potential market demand and projected rate of sales in Stone; as well as the cost factors associated with the site. In addition, Richborough has extensive experience working with nationally significant development partners such as Bellway, Barratt David Wilson, CALA, Miller, Mulberry, Kier, Lion Court, Taylor Wimpey and Vistry. On Richborough's sites, the average completion rate per sales outlet is a combined rate of 50 dpa for both market and affordable housing provision. Richborough confirms that the development of the site is economically viable, deliverable and achievable in accordance with the NPPF.



Key Benefits.

The allocation of the site will support new housing in an appropriate location and ensure that a quantity, quality and mix is provided to support the economic growth of the Borough. The delivery of the site will provide significant benefits to the Borough and to Stone. These are summarised as follows:

- Economic Benefits
- Social Benefits
- Environmental Benefits





Economic Benefits

The development of the site will have significant economic benefits, both from its construction and occupation. Key economic benefits include:

- Generating investment during the construction phase of development through construction cost, FTE construction jobs and an increase in GVA.
- Generating permanent FTE jobs through the creation of a new Local Centre and new community assets.
- Providing long term occupation / operational benefits, including new resident expenditure, attracting new and high earning residents to SBC, and, overall, generating increased economic output in the Borough.
- Generating significant Council Tax revenue for the Local Authority owing to the development of approximately 800 homes.
- Underpinning the catalytic growth opportunities in Stafford by providing the type, quality and spatial distribution of homes in Stafford that will allow the Borough to capitalise on its locational advantages and the arrival of HS2.

Social Benefits

The delivery of the site will have clear social benefits for existing and future residents in terms of providing better choice of housing, improving access to amenities and meeting a variety of identified housing needs. The key social benefits include:

- Delivering high quality market homes to meet the needs of the Borough's existing and future employees.
- Providing viable and deliverable affordable homes. The site will provide, at a minimum, a policy compliant level of affordable housing.
- Delivering new and accessible multifunctional open spaces, amenity spaces and green infrastructure, including the potential to explore opportunities for a new Country Park, to benefit existing and future residents and to deliver improved health and wellbeing outcomes.
- There is the potential for the delivery of a local centre/community hub on the site, which would provide increased opportunities for social interaction.

Environmental Benefits

The development of the site has the potential to uplift the biodiversity, accessibility and overall enjoyment and environmental value of the site. In addition, the site has the potential to be an exemplar in sustainable design and construction. Key environmental benefits include:

- The site will create new habitats for a range of species and will seek to provide significant biodiversity net gain on-site (in excess of Government targets), through the incorporation of wide-ranging measures for ecological enhancement.
- The provision of multi-functional green infrastructure and open space that will generate significant recreational benefits for existing and prospective residents, including the potential for a new Country Park that will benefit the entire settlement of Stone and beyond.
- The protection and enhancement of existing features of the site that add value, including mature trees and hedgerows, wherever possible.
- The promotion of and commitment to new cutting-edge net zero technologies by Richborough.



Richborough Estates Ltd

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Appendix 3 – Review of New Passenger Station Proposals

Meecebrook

Review of new passenger station proposals

5th December 2022

Document history

Date	Version	Issued to	Status	Quantity	Format	Approved
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05/12/2022	3	Client	FINAL	1	PDF	NTG

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1 Introduction

1.1 Scope of this report

- 1.1.1 Stafford Borough Council (SBC) is promoting a new Garden Community settlement at Meecebrook. SBC describe the site as lying approximately 6km west of the market town of Stone, in Staffordshire and near to the villages of Eccleshall, Swynnerton and Yarnfield. The M6 motorway runs east of the site, along with the HS2 line. The West Coast Main Line and Stafford to Manchester Railway Line, via Stoke-on-Trent, form part of the extensive railway network surrounding the site, with the closest station located in Stone.¹ The new Garden Community would include around 6,000 homes, employment space and community facilities. This will also include infrastructure needed to support the homes like GP and health provision, sustainable travel, and a new West Coast mainline railway station. Meecebrook Garden Community will be considered as part of the Council's Local Plan 2020-2040 process, with 3,000 new homes and necessary infrastructure to be delivered by 2040, and a further 3,000 new homes beyond 2040.²
- 1.1.2 Intermodality has been commissioned by a consortium of developers and land promoters, comprising Richborough Estates Ltd, Bloor Homes Ltd, Bellway Homes Ltd and Stoford Developments Ltd, to review the Council's proposals for the new station on the West Coast Main Line (WCML).

¹ Meecebrook Garden Community Leaflet, page 2

² <https://www.staffordbc.gov.uk/meecebrook-new-garden-settlement>

2 Development of new station proposals

2.1 Network Rail guidance

2.1.1 Network Rail (NR) is the licenced, regulated manager of the national rail network. Any new station proposal on the national rail network will require engagement with, and approval of, Network Rail. Network Rail's licence obligations require it to be confident that when schemes are completed, they can be operated and maintained safely, reliably, efficiently and cost effectively.³

2.1.2 In its guide to investment in new stations, Network Rail states (our highlighting):

The Investment in Stations Guidance is for use by any organisation which is interested in investing in station facilities. Such promoters would typically include **local authorities**, private developers, regional bodies and community rail partnerships. The guidance aims to ensure that such investment returns the maximum benefit to the investor and to passengers and other station users.

New Stations: A Guide for Promoters was originally published by the Strategic Rail Authority (SRA) in 2004. Following significant changes in the structure of the rail industry and the winding up of the SRA, Network Rail published a revised document Investment in Stations: A guide for promoters and developers in 2008. An update was published in 2011 to accompany the Network RUS: Stations published in the same year. This 2017 version retains the core guidance offered in the 2011 edition. Updates have been made to structure and content based on feedback from stakeholders:

- The document has been updated to take account of changes to legislation, policy and standards;
- **Greater emphasis is placed on the requirement that schemes be value for money, fit with industry plans, have an affordable whole life cost, and minimise disruption to the operational railway;**
- The document has been restructured to guide promoters clearly through key considerations for the initial development of a scheme.

The key considerations discussed are as follows:

- An option selection process should be carried out in order to establish that the option selected is the most effective means of achieving the promoter's objectives;
- **Engagement with both the local train operating company (TOC) or companies, the Station Facility Owner (SFO) and Network Rail is vital as they can advise the promoter as to the potential operational and financial viability of a proposal for station investment at an early stage;**
- **Enhancement of existing station facilities should generally be the first option considered for station investment as it is likely to minimise disruption and adverse operational impacts on the railway.** Consideration should be given to relocating an existing station or the opening of a new station where enhancement does not meet the scheme's objectives or there are additional benefits associated with these options. **However, station relocation or the addition of a new station to the network is likely to cause disruption and will only be possible where operational constraints allow;**

³ Investment in Stations, A guide for promoters and developers, Network Rail June 2017, page 17

- The timescale for construction of a new station is generally, on average, two years from start to finish. Significant time before this is required to develop and approve a proposal;
- Any proposed investment needs to demonstrate a positive impact for passengers and the existing railway network. For example, a new station needs to serve a new market and provide links to origins and destinations which would be desirable to potential passengers **without substantial disadvantages such as longer journey times for existing passengers**. This positive impact should be demonstrated in a WebTag compliant business case;
- Investment proposals must consider government objectives for the relevant route and the Long Term Planning Process (LTPP) which is the rail industry's plan to 2043. **Proposals which have impacts conflicting with industry strategy are unlikely to secure industry support**;
- Proposed investment should consider other recent and planned investments in stations and the rail network. A programme of planned investment may provide a good or even a one-off opportunity for coordinated third party investment in station facilities. Conversely, the relocation of a station which has recently seen substantial investment or **the opening of a new station on a section of line that has had journey time improvements is unlikely to offer benefit to the railway**;
- When station investment is partially or wholly funded by the Department for Transport (DfT) or Transport Scotland (TS) from a ring fenced fund, or is under a commercial framework to administer DfT or TS funding, the investment should be targeted to meet the conditions of that funding. These may include revenue return to the DfT or TS, generation of new revenue streams, passenger satisfaction improvement measurement through passenger survey Key Performance Indicators (KPIs) or other specific objectives.⁴

2.1.3 Network Rail then summarises the process for preparing a proposal for a new station:

- In order to show how the above objectives will be achieved by investing in a station the proposal will need to:
- Identify the nature of the local transport challenges being faced;
 - Determine the different transport options that could be adopted;
 - Understand the existing and future market for rail travel;
 - Demonstrate why a rail based enhancement is most appropriate as part of a package of enhancements or on its own;
 - Evaluate which of the potential options for rail investment is appropriate; consideration should be given to rolling stock and timetabling solutions which for some objectives may offer better value for money than investment in a station;
 - Consider the impact of the proposed option on the operation of the railway;
 - Consider how the proposed option fits with industry strategy and objectives.⁵

2.1.4 Throughout the document, Network Rail stresses the importance of early engagement with the rail industry on proposals for new stations, stating:

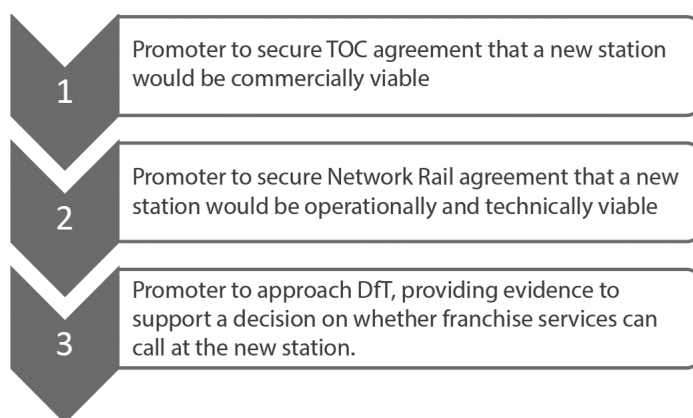
⁴ Pages 3-4

⁵ Page 5

A Train Operating Company (TOC) must support the provision of services to the new station and early engagement with TOCs is essential to any proposal.⁶

Without a positive business case a scheme will not be taken forward for consideration by railway industry stakeholders. The railway industry encourages promoters to have early discussions with the contacts identified in chapter 8 to establish the likely viability of proposals and for guidance in preparing a business case. It is vital that rail industry bodies are consulted as early as possible in the development of a proposal for investment in a station. Network Rail and the relevant TOC(s) will be able to gauge the potential viability of a scheme from the outset. They can also provide specific local advice and guidance on operational considerations which must be taken into account in order to develop a successful proposal, and information on any enhancements or changes to service patterns already planned at the station. The diagram below sets out the early steps promoters should take in developing a proposal for a new station.⁷

Figure 1 Early steps for promoters of new stations (source Network Rail)



Operational and performance issues need to be considered at the inception stage of the project and early engagement with Network Rail and TOCs is recommended to establish scheme feasibility. It is important that a proposal for a new station is developed with cognisance of the current and planned service pattern on the route and of existing infrastructure constraints. Engagement with Network Rail is advisable in these cases as they may be able to provide an early view of forthcoming Route Study recommendations.

Having established whether there is a fit with the industry planning framework, a promoter will also need to form an early view as to the appropriate service pattern at the new station. This would include the practicality of stopping all or just some of the existing services at the new station, or of introducing new services to serve the facility. The views of the relevant franchising authority should be sought.⁸

⁶ Page 6

⁷ Page 7

⁸ Page 13

Early engagement with the rail industry is indispensable to ensure that proposals for station enhancements or new stations can be developed successfully. Network Rail's route-based Strategic Planning teams act as the first point of contact for promoters. Where Network Rail is involved in the proposed enhancement, Network Rail's Strategic Planning teams will work with developers and local authorities on the scheme throughout the feasibility processes and planning stages.⁹

As the day to day operators of stations, TOCs have invaluable knowledge about the needs of their customers and the issues that need to be addressed. They are a key party to any changes that are proposed and should be involved in any proposal from an early stage.¹⁰

Early dialogue with industry parties is essential as they can assist promoters in working through these requirements and in some cases take the lead to ensure that certain requirements are met.¹¹

- 2.1.5 In addition to Network Rail, the Department for Transport (DfT) will in turn expect to receive an initial Strategic Outline Business Case (SOBC) for the new station, as with other station projects being developed or promoted in recent years (see Table below). This also highlights the range of lead times involved in delivering new stations:

Table 1 Examples of recent station SOBC

Site	First proposed	SOBC	BCR	Opening date
Old Oak (London) ¹²	2010	2017	3.5	2030
Magor and Undy (South Wales) ¹³	2013	2018	1.7	None at present
Worcestershire Parkway ¹⁴	2006	2014	3.3 – 3.6	2020
Cambridge South ¹⁵	2017	2021	1.9	2025
Darlaston and Willenhall stations (West Midlands) ¹⁶	2017	2021	4.7 – 6.5	2023

⁹ Page 17

¹⁰ Page 20

¹¹ Page 21

https://www.whatdotheyknow.com/request/599394/response/1427134/attach/3/FINAL%20Old%20Oak%20Overground%20Stations%20Consolidated%20SOBC%202017%20Full%20Document.pdf?cookie_passthrough=1

¹³ <http://magorstation.co.uk/wp-content/uploads/2020/06/Magor-and-Undy-Station-SOBC-revB.pdf>

¹⁴ <http://e-planning.worcestershire.gov.uk/swift/apas/run/WCHDISPLAYMEDIA.showImage?theSeqNo=15526&theApnkey=848&theModule=1>

¹⁵ <https://sacuksprodnr.digital0001.blob.core.windows.net/twao-cambridge-south-infrastructure-enhancements/Cambridge%20South%20station%20OBC/Cambridge%20South%20Outline%20Business%20Case.pdf>

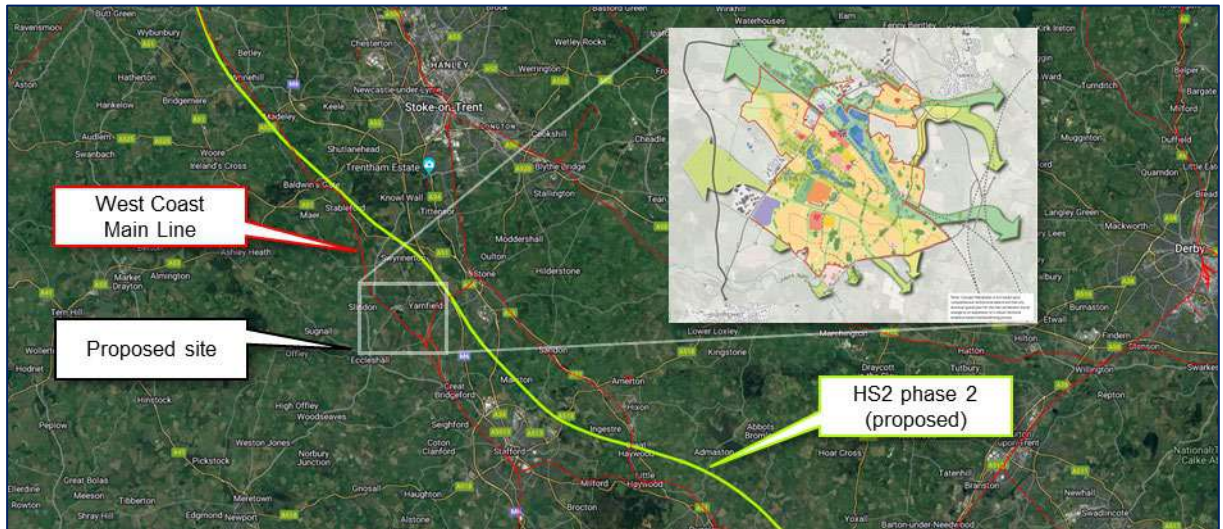
¹⁶ <https://governance.wmca.org.uk/documents/s5126/Report.pdf>

3 The proposed site

3.1 Location

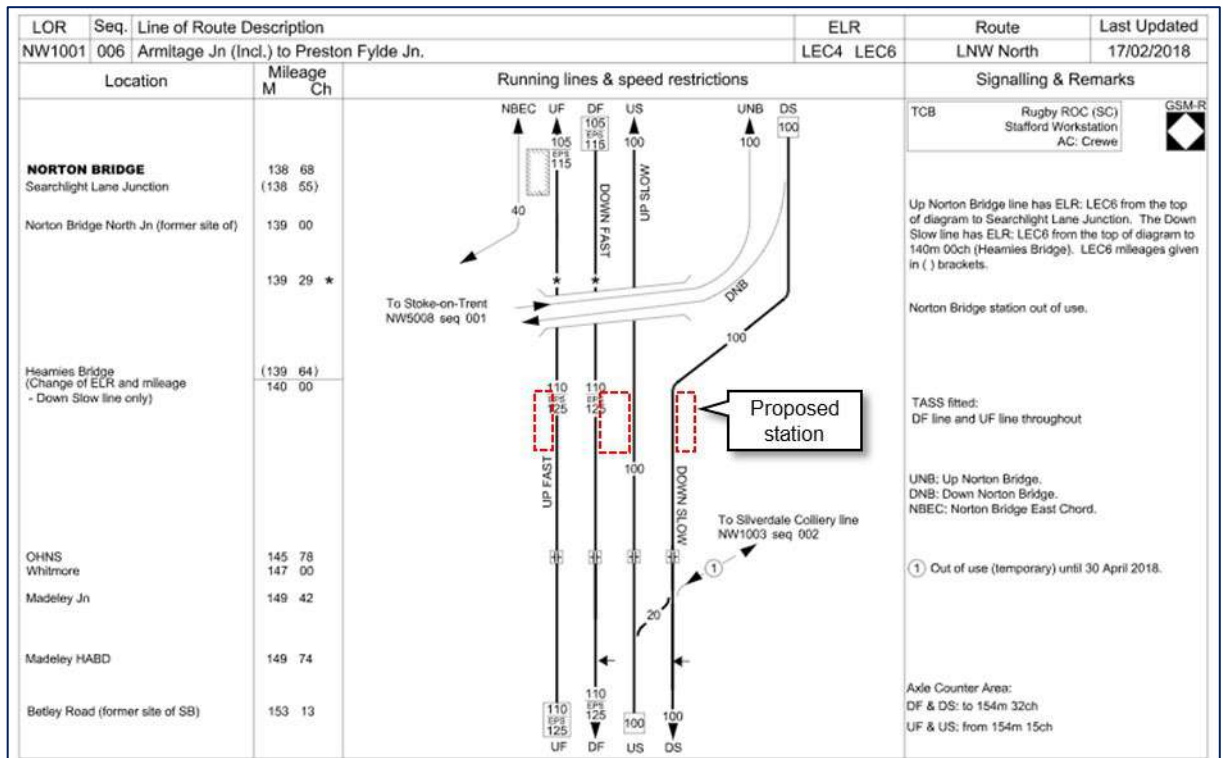
3.1.1 The location of the site relative to the West Coast Main Line (WCML) is shown in the Figure below:

Figure 2 Location plan



3.1.2 The site is located immediately to the north of Norton Bridge Junction, a major grade-separated intersection of the WCML between the routes to Crewe, Stafford and Stoke-on-Trent respectively:

Figure 3 Site location (source Network Rail Sectional Appendix, north to bottom of picture)



- 3.1.3 The proposed location is a four-track main line, with trains passing the site at speeds of up to 100-125mph. It is also worth noting that the track layout has two running lines for “fast” services at 110-125mph linespeed on the eastern side of the formation (left on the above Figure) and two running lines for “slow” services on the western side of the formation (right on the above Figure). The feasibility studies undertaken for SBC (see next section) assume that new platforms would be needed to enable trains to call at the station on the fast lines when the slow lines are closed for engineering and vice versa. This would require major works to (and disruption of) the entire WCML, to separate the fast and slow lines to allow the insertion of a new island platform and outer platforms, as indicated in the Figure above.

3.2 West Coast Main Line current traffic levels

- 3.2.1 The WCML falls within Network Rail’s North West & Central (NW&C) route, described as follows:

NW&C is the ‘Backbone of Britain’ – the economic spine linking our main cities. We connect workers with jobs, people with loved ones and goods to market.

Our infrastructure runs from London Euston and Marylebone in the south through the Chiltern and West Midlands regions, the North West of England and Cumbria before joining with Scotland at Gretna. We are home to the West Coast Main Line, the busiest mixed-use railway in Europe, serving London, Birmingham, Manchester, Liverpool, Edinburgh and Glasgow.

In the five years to 2024, passenger demand is set to grow by 12% and freight by 18%. Major railway upgrade schemes to cater for this growth include HS2, East West Rail, Midlands Rail Hub and the Great North Rail Project.

- 246.5 million annual rail passenger journeys;
- 1.3 million passengers travel through this region each weekday;
- 6,724 passenger and freight services per day;
- 700,000 tonnes of freight is moved each week.¹⁷

- 3.2.2 With regard to the section of the WCML south of Crewe, Network Rail further notes:

The West Coast South route stretches from the south of Crewe to London Euston. It carries millions of passengers and up to 10% of freight traffic a year.

It’s also the busiest mixed-use railway in Europe, forming Anglo-Scottish journeys between London, Glasgow and Edinburgh via the West Midlands and North West, as well as providing commuter links direct to the capital through Hertfordshire, Northamptonshire and Buckinghamshire.

This piece of track is the main route for electrified freight trains which helps to remove lorries from the roads and will contribute to the UK’s ambition to reach net zero carbon emissions by 2050.¹⁸

¹⁷ <https://www.networkrail.co.uk/running-the-railway/our-regions/north-west-and-central/>

¹⁸ <https://www.networkrail.co.uk/running-the-railway/our-routes/west-coast-mainline-south/>

- 3.2.3 The latest (December 2022) working timetable (WTT) shows over 500 trains passing the site every 24 hours, split almost 50:50 between passenger and freight, with a train passing the site of the new residential community every 3 minutes throughout the day and night, including 2,400 tonne aggregate trains, 775m long intermodal trains and 125mph high-speed passenger trains.¹⁹ This level of intensity and variety of rail traffic creates major challenges for developing any new station on this section of the WCML, not least the knock-on effects to existing passenger and freight services of introducing an additional station stop within the timetable.
- 3.2.4 Even with the proposed construction of phase 2 of HS2 (see below), the WCML is already expected to see additional growth in traffic for passenger and freight, the latter boosted by new developments such as the West Midlands Interchange project under construction to the south of Meecebrook, at Four Ashes in Staffordshire, which will have capacity to generate up to 10 new freight trains per day onto the WCML.²⁰

3.3 West Coast Main Line journey time improvements

- 3.3.1 The WCML has been the subject of a series of major route upgrades to improve capacity and capability over the last 20 years. The first phase of the upgrade, south of Manchester, opened in 2004 delivering journey time improvements of 1 hour 21 minutes for London to Birmingham and 2 hours 6 minutes for London to Manchester. A second phase, introducing 125 mph running along most of the line, opened in December 2005, bringing the fastest journey between London and Glasgow from 5 hours 10 minutes to 4 hours 25 mins. Substantial further works were undertaken, including quadrupling of the track in the Trent Valley, upgrading the slow lines, remodelling track and signalling through Nuneaton, Stafford, Rugby, Milton Keynes and Coventry stations, which was completed in late 2008. A £250 million project to grade-separate the tracks at Norton Bridge, which allowed for increased service frequency as well as improved line-speeds, was completed in 2016.
- 3.3.2 We are not aware of the Meecebrook station proposals ever being considered within any of these route upgrades, Network Rail noting in its new station guidance (see previous section) that “the opening of a new station on a section of line that has had journey time improvements is unlikely to offer benefit to the railway.”

3.4 West Coast Main Line route strategy

- 3.4.1 Network Rail’s specification of, and plans for, the WCML are set out in its 2021 Route Specification document.²¹ Network Rail makes no reference to proposals for a new station at Meecebrook.

3.5 HS2

- 3.5.1 Phase 2a would extend the new high speed railway line north west to the proposed Crewe Hub station from the northern extremity of Phase 1 (London to West Midlands) north of Lichfield. Phase 2a was approved by the House of Commons in July 2019, and received Royal Assent on 11 February 2021. Construction of phase 2a will be in parallel with Phase 1, HS2 suggesting that services will begin operating between London, Birmingham and Crewe between 2029 and 2033.²²

¹⁹ Source Network Rail (realtimetrains.co.uk website)

²⁰ <https://news.railbusinessdaily.com/west-midlands-interchange-is-set-to-boost-local-jobs-and-the-economy/>

²¹ Delivering a better railway for a better Britain Route Specifications 2021 North West and Central (NW&C) region, Network Rail

²² <https://www.hs2.org.uk/the-route/west-midlands-to-crewe/>

4 Meecebrook station feasibility studies

4.1 Reports produced to date

4.1.1 Reports produced to date include:

- Meecebrook Garden Community Transport Strategy, July 2020 (Atkins);
- Pre-Feasibility Report V0.1, March 2022 (SLC Rail);
- Feasibility Report v1.0, July 2022, updating work in the March 2022 report (SLC Rail).

4.2 July 2020 Atkins report

4.2.1 Notably, the Atkins report assumed a much higher level of development (around 10,000 homes²³) than currently proposed.

4.2.2 The main findings of the 2020 report related to the station included:

- Overall, it was found that the additional trips on the external highway network as a result of trips from Meecebrook Garden Community would still have a major impact even with the new railway station, and therefore potential mitigation solutions would need to be considered, including
 - Highway mitigation measures along existing corridors or junctions to improve the existing highway capacity;
 - An additional motorway junction to provide additional access to the SRN; or
 - The promotion of alternative sustainable modes of transport to reduce car dependency;²⁴
- It is understood that Staffordshire County Council (SCC) are engaging with Network Rail regarding the potential to deliver a new railway station on the West Coast Mainline;²⁵
- Stafford Borough has good rail connectivity and is served by the West Coast Main Line with existing railway stations located at Stone, Stafford and Stoke-on-Trent. It is important to note that the proposed alignment of HS2 runs to the north of the site. It is proposed that Stoke will become an 'integrated high-speed station' where passengers can travel on classic-compatible HS2 trains and access the high-speed network to the South.²⁶

²³ Page 4 section 1.1

²⁴ Page 7, 24

²⁵ Page 8

²⁶ Page 8

4.3 July 2022 SLC report

Demand modelling

- 4.3.1 SLC draws on an appended analysis by SYSTRA to conclude that once Meecebrook is fully built there is a prospect of station revenue generating a medium level of value for money (BCR 1.5). To set this in context, the Department for Transport's "WebTAG" categorisation of projects defines "medium" value for money as a BCR of between 1.5 and 2.0, so the case for the new station would be at the lower end of this range.
- 4.3.2 It is also important to note here the assumption in the demand forecasting that the new station would be open by 2026 (an optimistic assumption, given the time stations can take to plan, secure approval / funding and construct, see Table 1), but to achieve a viable position the entire 6,000 homes would need to have been delivered.
- 4.3.3 This is an important point to note, as SBC suggest an initial phase of 3,000 new homes and necessary infrastructure to be delivered by 2040, and a further 3,000 new homes beyond 2040, the implication being (assuming the Council's lead-in times and delivery rates of 300 dwellings per annum) that 6,000 homes could take until beyond 2050 to deliver. In the interim, SYSTRA has previously noted, in a separate analysis of another proposed settlement and station in Bedfordshire on behalf of the local planning authority, that:

The development, in isolation of any other new settlement development options, will allocate 4,500 dwellings, **below the 5,000 dwellings considered the indicative benchmark for considering the construction of a new railway station.**²⁷

- 4.3.4 It is also worth noting that SYSTRA forecast that a new station would abstract customers from existing stations of 4,423 per annum in 2026 (assumed first year of opening, 4 years before the delivery of any houses on site) to 9,936 in 2040 (end of Local Plan Period).²⁸ SYSTRA further note in this regard:

The number of passengers lost from existing services [14,000 in 2026 to 31,000 in 2040] is fairly significant compared to station trip generation in 2026. However, by 2040, after full development build out this is far less significant.²⁹

- 4.3.5 This level of abstraction from existing stations and services (which would be assumed to increase further beyond 2040) would be one of the key considerations by TOCs, Network Rail and DfT in determining the acceptability of the new station proposals. In the short term, the implication is that the new station, in a remote location devoid of any development, would then abstract passengers from existing stations, diverting highway trips into the local area.
- 4.3.6 SYSTRA conclude the analysis that:

Our analysis has shown that that station is predicted to generate medium value for money. However, this is entirely dependent on the delivery of development surrounding the station.³⁰

- 4.3.7 SYSTRA then reiterate later in the document that:

²⁷ Sharnbrook Railway Station Initial Transport Feasibility, SYSTRA for Bedford Council

²⁸ Page 13 of SYSTRA report

²⁹ Page 14 of SYSTRA report

³⁰ Page 9 of SYSTRA report

Delivering a station at Meecebrook is predicted to deliver Medium value for money. However, this is heavily dependent on the delivery of the adjacent Garden Village development.³¹

Train Service Planning

- 4.3.8 SLC conclude that there is a reasonable prospect of achieving a train frequency of two trains per hour at the station, albeit noting that HS2 introduces a level of complexity in developing a future train plan specification.
- 4.3.9 These conclusions draw on supporting appended work by Rail Aspects, which sets out the context in terms of current traffic levels and utilisation of the WCML, stating:

The Stafford-Crewe section of the WCML is intensively utilised, although the segregation of Fast Lines and Slow Lines combined with the recent grade-separation of the junction at Norton Bridge provide some flexibility with the principal constraints being either side of Crewe, where the four-track alignment narrows to a three-or two-track alignment.

South of Stafford, the Trent Valley is a 2-track railway between Milford Jn. and Colwich Jn., then reverts to 4-track except for a short distance south of Nuneaton.

The route between Stafford and Wolverhampton is, by the current standards of the railway network, relatively lightly utilised with only six trains passing in each direction in most hours. Further to the south, this route becomes increasingly congested through Wolverhampton and at Birmingham New Street and the service is sufficiently intensive throughout the day that it is very difficult to find flexibility in train paths.

Onwards towards Liverpool, the route is fairly congested with a mixture of high-speed, regional and local services, although with some flexibility around individual train paths.

In summary, retiming of services to accommodate a station call at Meecebrook would probably need to take place away from Birmingham New Street and the WCML South, and also minimise any impact on high-profile, high-speed services on the WCML.³²

- 4.3.10 An important point to note from the Rail Aspect report is the need for new platforms serving both the fast and slow lines on the WCML, the report stating:

Provision of station calls at Meecebrook is highly likely to require provision of a 4-platform station, i.e. platforms on the Fast Lines and on the Slow Lines. Although it would probably be possible to arrange for the majority of weekday stopping services to be timetabled on the Slow Lines, this would not be possible on Sundays owing to engineering access restrictions. It is also considered likely that services planned via the Slow Lines will be regularly run via the Fast Lines during periods of disrupted running, as a service recovery measure.³³

- 4.3.11 The Rail Aspect report notes potential issues with the signalling and operation of services through any new station:

³¹ Page 19 of SYSTRA report

³² Page 6 of Rail Aspect Report

³³ Page 2 of Rail Aspect Report

Local signalling is designed for high speed non-stop services, with block lengths of 1100m to 1400m (Figure 2) and the planning headway in the immediate vicinity is 3 minutes between following train services (up to a maximum of 13 trains per hour on the Fast Lines).

Consequently, it should be assumed that the current signalling would not be ideally suited to stopping of services within the signal blocks.

However, given the relatively anticipated level of service, together with the flexibility offered by the 4-track configuration, any alterations to existing signalling are considered likely to be necessary only if it is required to run consecutive stopping services at close headways or if the location of existing signals conflicts with other engineering considerations such as the location of station platforms.

4.3.12 In terms the performance impact on other services, the Rail Aspect report states (our highlighting):

Introduction of the station calls within the existing service would likely have some performance implications, particularly in the form of risk of knock-on delays to other train services, **as the route is congested, especially towards Liverpool, and towards Wolverhampton and Birmingham**. These risks have not been quantified but are considered unlikely to be severe enough to prevent further development of the scheme at this stage.³⁴

It is inevitable, when inserting additional station calls in existing services, that some level of performance risk is incurred. It is noted that the WMT London Northwestern service groups have recently performed below Operator target performance levels, and any proposals to modify the service are likely to have some degree of sensitivity around potential performance impacts.

In this case, the specific risks would be increases in “1st Order” reactionary delays along the Stafford-Crewe corridor and potentially on towards Rugby, Birmingham and Crewe, i.e. faster trains being delayed by the stopping services. “2nd Order” reactionary delays, i.e. outbound services delayed by late arrival of the inbound service might also be a risk, in particular at Liverpool (see Section 8.3) and Birmingham New Street where some splitting and joining of services takes place.

Avanti West Coast have stated an objective of running a second hourly Euston-Liverpool path. Details of this service are not yet available; there is some risk that this would further complicate adjustments to the timetable.

Aside from performance risks, there may be complexities in the detail of retiming of services either locally (for example, diverting from the Fast to the Slow line) or more widely (for example, rigid timetable structures in the Liverpool area) that are not apparent from this initial overview.³⁵

4.3.13 The situation post-HS2 is also referenced by Rail Aspect, which notes (our highlighting):

Once Phase 2a is open between Birmingham and Crewe, high speed services are expected to operate from London Euston via HS2 and Crewe Hub, to Glasgow, Edinburgh, Manchester, Liverpool and North Wales using classic-compatible high speed rolling stock.

³⁴ Page 2 of Rail Aspect Report

³⁵ Pages 11 and 12 of Rail Aspect Report

In theory, this will remove most long-distance high-speed traffic from the WCML south of Crewe; **however, it appears likely that at least some paths will be retained to maintain connectivity with intermediate stations** such as Milton Keynes, Rugby, Coventry, Wolverhampton, the Trent Valley stations and Stafford. As end-to-end journey times will become less sensitive, it is also possible that these paths will be regularised, e.g. adding additional calls at Milton Keynes or Stafford, for example.

This would offer improved journey times from these locations whilst also reducing constraints on capacity on the Stafford-Crewe section, either by reducing the number of required paths or by increasing the flexibility of remaining paths (possibly also opening up the potential to introduce calls at Meecebrook in residual train services).

However, constraints on other routes (Crewe to/from Liverpool in particular, and between Wolverhampton and Birmingham to some extent) would probably remain in place post-HS2.

4.3.14 In terms of industry engagement, Rail Aspect confirm that no industry engagement was undertaken at the time of writing, noting that Train Operating Companies (TOCs), Freight Operating Companies (FOCs) and Network Rail will need to be engaged at the earliest opportunity.³⁶

4.3.15 Rail Aspect concludes that:

Based on the analysis that has been conducted, and assuming a timetable baseline equivalent to the December 2019 (pre-COVID) service specification, station calls at Meecebrook could be accommodated in at least one of the two existing twice-hourly West Midlands Trains services between Liverpool Lime Street and Birmingham New Street/London Euston, by means of timing adjustments to these services and without undue consequences.

Insertion of calls in other passing services (predominantly Avanti West Coast high speed services) is likely to prove more problematic and has not been investigated in depth at this stage.³⁷

4.4 Station location, value-for-money and Strategic Case

4.4.1 SLC conclude in the Executive Summary that:

- A potentially viable location has been identified;
- A good prospect of obtaining an acceptable BCR;
- A proposed methodology to make the strategic case is defined, although the summary table indicates that work on the strategic case was yet to be completed.

4.4.2 SLC appear to have undertaken a considerable amount of work, covering technical disciplines and topics typically associated with, involving or led by Network Rail, but without any evidence of Network Rail (or wider industry) involvement in developing, reviewing or validating this work.

4.4.3 Of the options considered, SLC indicate the North Option to be preferable, within the context of the main risk and cost drivers identified as follows:

³⁶ Page 12 of Rail Aspect Report

³⁷ Page 1 of Rail Aspect Report

The main risk and cost drivers for this option are associated with the signalling modifications required to accommodate the station, as the existing signals are too far away (and obstructed by structures) to be visible from the platform ends. Early engagement with Network Rail's Signalling Project Engineer (PE) and Route Asset Manager (RAM) is therefore critical to the success of this option.

In addition, the Network Rail RRAP [Road-Rail maintenance vehicle Access Point] will need to be relocated to accommodate the new platform, however as the existing RRAP and access route is located fully within the boundaries of the current development masterplan, it is assumed that this relocation will be feasible and some change to the RRAP will be required as part of the development masterplan, regardless of the station project going ahead.³⁸

- 4.4.4 In terms of costs, SLC suggest the base cost for the North Option to be £34.1m, plus risk allowance of 60%, totalling £54.6m, SLC noting these exclude the significant recent increase in construction costs.³⁹ This differs from the assumption used in the SYSTRA report of £39.99m plus Optimism Bias, market price conversion and inflation totalling £102.6m, almost twice that assumed by SLC.⁴⁰
- 4.4.5 The reports do not explain how the difference between station / farebox income and the significant upfront investment costs, or annual operating costs (£200,000 excluding Optimism Bias of up to 41%⁴¹) would be covered in the period between 2026 and the mid-2050s when the development achieves the critical mass needed to deliver a viable business case.

4.5 Rail industry engagement

- 4.5.1 As with the Network Rail guidance set out in Section 2 earlier, the SLC report makes repeated references for the need to engage with the wider rail industry, but there is no evidence that the local authorities have engaged with Network Rail, TOCs, FOCs, the Rail Delivery Group, the Rail Freight Group, or the Department for Transport.
- 4.5.2 This lack of engagement is highlighted by a recent (October 2022) Freedom of Information request made to Network Rail asking for confirmation of whether a new station had been agreed with SBC and what stage the proposals had reached.⁴² Network Rail responded (see Appendix) stating that (our highlighting):

1) Please confirm if a new West Coast Mainline station has been agreed.

We have not made any agreements relating to a new station at Meecebrook. As mentioned above, our planners are carrying out work to assess the long-term impact of some new station proposals on the West Coast South route, but this work is not looking at developing the case for, or the deliverability of, a new station at Meecebrook in the short-to-medium term.

2) If it has not been agreed, what stage are proposals at?

There are currently no Network Rail proposals for a station at Meecebrook and our planners have advised that they have not been consulted with directly by Stafford Borough Council or Staffordshire County Council on this subject.

³⁸ Page 31 of the Feasibility Report

³⁹ Page 18 of Feasibility report

⁴⁰ Page 16 of SYSTRA report

⁴¹ Page 17 of SYSTRA report

⁴² https://www.whatdotheyknow.com/request/meecebrook_claims_regarding_new

3) What would be the approximate total cost of a new station?

We are unable to advise on this point, as Network Rail has not assessed this.

4) Who would pay for this?

Again, we are unable to advise as we do not have any specific proposals for Meecebrook.

5) Does a new development on greenfield (instead of brownfield) fit with the Network Rail environmental strategy?

As we have not been involved in any proposals, this is not something Network Rail has looked at.

5 Conclusions

5.1 The case for a new station at Meecebrook

5.1.1 The pre-feasibility and feasibility studies, and our assessment of the technical work, highlight several key issues and areas of risk in developing a brand new, multi-platform station on the WCML, including:

- The intensity of current rail services on the WCML, the 'Backbone of Britain', the busiest mixed-use railway in Europe with a nationally-significant role for moving passengers and freight;
- A series of major upgrades to the WCML have been undertaken in recent years to improve capability and reduce journey times, including a major grade-separated junction at Norton Bridge, but without any provision being made in the previous or current strategy for any new station at Meecebrook;
- Engineering access on the WCML, which shuts either the fast or slow lines passing the site, would necessitate a 4-platform station to be constructed for network operational reasons, but which would not otherwise be justified commercially, adding substantially to the complexity, cost and risk of delivering the station, relative to the size of the adjacent development which would need to fund and sustain it;
- Current signalling not being suitable in capacity or location to accommodate a new station, and as such adding to the complexity, cost and risk of delivering the project, in terms of new and altered signalling;
- A new station would abstract demand and revenue from existing stations;
- The need for the entire development to be completed (which might not occur for another 30 years) in order to generate sufficient critical mass of demand, with no indication in the reports on how / who would cover the financial losses in the intervening period;
- The ability to fund and deliver rail enhancements in the current climate, SLC noting recently that:

Covid-19 and its multiple impacts on ways and places of work, demand for rail travel, government funding of railway services and future enhancements, and some resultant semi-permanent service reductions, including a number affecting Worcestershire.

The collapse of rail passenger demand during the COVID lockdown from March 23rd 2020 not only required substantial funding support from government for the maintenance of services but challenged industry thinking and evidencing of future network development given its impact upon ways of working, locations of work, commuting and leisure travel, and hence of the nature of train services and connectivity that may be required in a post-COVID future.⁴³

- The conclusion from Atkins that, even if the station were to be delivered, the development would still generate considerable levels of highway trips, requiring further mitigation measures;⁴⁴
- The conclusion of SLC that the station business case would achieve a BCR of 1.5, at the low end of the range for "medium" value for money.

⁴³ Worcestershire Draft Rail Investment Strategy 2 2022 to 2050, SLC Rail for Worcestershire County Council, July 2022, pages 3 and 9

⁴⁴ Atkins report page 7, 24

- 5.1.2 Even setting aside these challenges, the fundamental concern with the conception of the proposals for a new station at Meecebrook is the apparent complete lack of early (or any) engagement with the rail industry, especially with Network Rail as the licenced, regulated manager of the national rail network. Network Rail's licence obligations require it to be confident that when schemes are completed, they can be operated and maintained safely, reliably, efficiently and cost effectively. Network Rail's guidance clearly and repeatedly states the need for, and benefits of, early engagement with industry, including TOCs, FOCs, DfT and other industry stakeholders
- 5.1.3 The WCML is one of the busiest routes in Britain, therefore demonstrating a compelling business case, in operational or commercial terms, will be particularly challenging. The post-COVID environment, with the substantial structural reductions in travel, farebox income and investment, means the value-for-money threshold for new stations across the network will now be set even higher, as promoters chase reduced public funding.
- 5.1.4 This creates a major concern with the viability of the proposed new station, given that the level of development needed to achieve (at best) a medium level of value-for-money would not be in place before the mid-2050's at the earliest, but with a scheme that assumes a station would be fully operational (with all investment and operating costs then covered) within the next 4 years. It is a major concern that the work to date does not explain how the significant upfront investment costs (£54-103m, which as SLC note does not factor in the significant recent increases in construction costs) or operating costs (£200,000 per annum excluding Optimism Bias of up to 41%) would be covered in the period between 2026 and the mid-2050s.
- 5.1.5 Having progressed early-stage multi-disciplinary feasibility work in the post-COVID rail sector, for a multi-platform station serving and affecting all four fast and slow lines of the 100-125mph WCML, with associated performance and capacity risks to over 500 existing passenger and freight services per day, without any early-stage engagement with Network Rail or wider industry stakeholders, clearly conflicts with the industry guidance (and the conclusions of the reports commissioned by SBC to date). The suggested merits and deliverability of the proposed new station therefore carry little or no weight in the absence of a review and validation by Network Rail and the wider rail industry stakeholders.
- 5.1.6 Based on our experience with the planning and implementation of major rail-related developments, we would have expected to see evidence of the station proposals being worked up to at least Engineering Stage 2 of Network Rail's governance for assessing new projects (Project Acceleration in a Controlled Environment or PACE), backed by a Basic Services Agreement (BSA) between SBC and Network Rail, within which a multi-disciplinary feasibility study would be undertaken jointly by the parties, with Network Rail providing a Commercial Scheme Sponsor to manage the process.
- 5.1.7 A critical initial component in this work would be a capability study, to determine to the satisfaction of Network Rail (and/or the TOCs/FOCs) the ability to path existing passenger services through any new station without importing unacceptable performance risk, as determined by Network Rail through its quality assurance process.
- 5.1.8 In the absence of such engagement, with reference to Network Rail's published guidance for new stations, the following limited conclusions can be drawn:

Table 2 Alignment of Meecebrook station proposals against NR guidance

Guidance	Current status
Greater emphasis is placed on the requirement that schemes be value for money, fit with industry plans, have an affordable whole life cost, and minimise disruption to the operational railway	A good prospect of obtaining an acceptable BCR provided entire development is built Construction and operation would bring disruption to all four WCML running lines
Option selection process to be undertaken	Limited assessment without industry engagement
Engagement with both the local train operating company (TOC) or companies, the Station Facility Owner (SFO) and Network Rail is vital as they can advise the promoter as to the potential operational and financial viability of a proposal for station investment at an early stage;	None to date as confirmed in writing by Network Rail
Enhancement of existing station facilities should generally be the first option considered for station investment as it is likely to minimise disruption and adverse operational impacts on the railway.	Not considered
Consideration should be given to relocating an existing station or the opening of a new station where enhancement does not meet the scheme's objectives or there are additional benefits associated with these options. However, station relocation or the addition of a new station to the network is likely to cause disruption and will only be possible where operational constraints allow	Relocation not considered Proposed addition of a new station Construction and operation would bring disruption to all four WCML running lines
The timescale for construction of a new station is generally, on average, two years from start to finish. Significant time before this is required to develop and approve a proposal	Reports produced in 2022 assume opening in 2026
Any proposed investment needs to demonstrate a positive impact for passengers and the existing railway network. For example, a new station needs to serve a new market and provide links to origins and destinations which would be desirable to potential passengers without substantial disadvantages such as longer journey times for existing passengers. This positive impact should be demonstrated in a WebTag compliant business case;	Limited assessment without industry engagement
Investment proposals must consider government objectives for the relevant route and the Long Term Planning Process (LTPP) which is the rail industry's plan to 2043. Proposals which have impacts conflicting with industry strategy are unlikely to secure industry support	Not referenced in Network Rail's Route Specification No evidence provided on LTPP alignment or other industry strategies
Proposed investment should consider other recent and planned investments in stations and the rail network. A programme of planned investment may provide a good or even a one-off opportunity for coordinated third party investment in station facilities. Conversely, the relocation of a station which has recently seen substantial investment or the opening of a new station on a section of line that has had journey time improvements is unlikely to offer benefit to the railway;	No evidence provided of wider synergies beyond HS2 The new station would be on a section of the WCML which has had substantial journey time improvements in recent years, but without any cognisance or provision for a new station
When station investment is partially or wholly funded by DfT from a ring fenced fund, or is under a commercial framework to administer DfT funding, the investment should be targeted to meet the conditions of that funding. These may include revenue return to the DfT, generation of new revenue streams, passenger satisfaction improvement measurement	Limited assessment without industry engagement

Guidance	Current status
through passenger survey Key Performance Indicators (KPIs) or other specific objectives	
Identify the nature of the local transport challenges being faced	Limited assessment without industry engagement
Identify the nature of the local transport challenges being faced	Limited assessment without industry engagement
Determine the different transport options that could be adopted	Limited assessment without industry engagement
Determine the different transport options that could be adopted	Limited assessment without industry engagement
Understand the existing and future market for rail travel	Limited assessment without industry engagement
Demonstrate why a rail based enhancement is most appropriate as part of a package of enhancements or on its own	Limited assessment without industry engagement
Demonstrate why a rail based enhancement is most appropriate as part of a package of enhancements or on its own	Limited assessment without industry engagement
Evaluate which of the potential options for rail investment is appropriate; consideration should be given to rolling stock and timetabling solutions which for some objectives may offer better value for money than investment in a station	Limited assessment without industry engagement
Consider the impact of the proposed option on the operation of the railway	Limited assessment without industry engagement
Consider how the proposed option fits with industry strategy and objectives.	No assessment
A Train Operating Company (TOC) must support the provision of services to the new station and early engagement with TOCs is essential to any proposal.	No engagement
Without a positive business case a scheme will not be taken forward for consideration by railway industry stakeholders. The railway industry encourages promoters to have early discussions to establish the likely viability of proposals and for guidance in preparing a business case. It is vital that rail industry bodies are consulted as early as possible in the development of a proposal for investment in a station. Network Rail and the relevant TOC(s) will be able to gauge the potential viability of a scheme from the outset. They can also provide specific local advice and guidance on operational considerations which must be taken into account in order to develop a successful proposal, and information on any enhancements or changes to service patterns already planned at the station.	No engagement
Operational and performance issues need to be considered at the inception stage of the project and early engagement with Network Rail and TOCs is recommended to establish scheme feasibility. It is important that a proposal for a new station is developed with cognisance of the current and planned service pattern on the route and of existing infrastructure constraints. Engagement with Network Rail is advisable in these cases as they may be able to provide an early view of forthcoming Route Study recommendations	Limited assessment without industry engagement
Having established whether there is a fit with the industry planning framework, a promoter will also need to form an early view as to the appropriate service pattern at the new	Limited assessment without industry engagement

Guidance	Current status
station. This would include the practicality of stopping all or just some of the existing services at the new station, or of introducing new services to serve the facility. The views of the relevant franchising authority should be sought	
Early engagement with the rail industry is indispensable to ensure that proposals for station enhancements or new stations can be developed successfully. Network Rail's route-based Strategic Planning teams act as the first point of contact for promoters. Where Network Rail is involved in the proposed enhancement, Network Rail's Strategic Planning teams will work with developers and local authorities on the scheme throughout the feasibility processes and planning stages.	None
As the day to day operators of stations, TOCs have invaluable knowledge about the needs of their customers and the issues that need to be addressed. They are a key party to any changes that are proposed and should be involved in any proposal from an early stage.	Limited assessment without industry engagement
Early dialogue with industry parties is essential as they can assist promoters in working through these requirements and in some cases take the lead to ensure that certain requirements are met.	None

5.1.9 As recommended by the Council's own advisers, the merits, deliverability and acceptability of the proposed new station can therefore only be confirmed with proper input from Network Rail, at least up to Engineering Stage 2 of the company's PACE corporate governance for assessing new stations, as well as input from other key stakeholders, including but not limited to:

- Passenger Train Operating Companies (TOCs), not least West Midlands Trains (London Northwestern Railway subsidiary), Avanti West Coast, CrossCountry, Caledonian Sleeper, Locomotive Services, West Coast Railways, Rail Operations Group and SLC Rail Operations;
- Rail Freight Operating Companies (FOCs), namely Colas Rail, DB Cargo, DC Rail, DRS, Freightliner, GB Railfreight and Varamis Rail;
- Rail Delivery Group and the Rail Freight Group;
- Department for Transport;
- Office of Rail & Road.

Appendix

Appendix A Freedom of Information response from Network Rail

Source: https://www.whatdotheyknow.com/request/meecebrook_claims_regarding_new



By email: request-906118-c2ae0023@whatdotheyknow.com

Network Rail
Freedom of Information

31 October 2022

Dear [REDACTED]

Information request
Reference number: FOI2022/01225

Thank you for your email of 9 October 2022, in which you requested the following information:

Stafford Borough Council is claiming that a new railway station will be built at a proposed garden village called Meecebrook on the West Coast Mainline.

The proposals are significantly scaled back now and exclude the MOD brownfield site that was originally part of the proposals in 2020.

- 1) Please confirm if a new West Coast Mainline station has been agreed.*
- 2) If it has not been agreed, what stage are proposals at?*
- 3) What would be the approximate total cost of a new station?*
- 4) Who would pay for this?*
- 5) Does a new development on greenfield (instead of brownfield) fit with the Network Rail environmental strategy?*

I have processed your request under the terms of the Environmental Information Regulations 2004 (EIR).¹

¹ The EIR, like the Freedom of Information Act 2000 (FOIA), allows people to access information held by public authorities like Network Rail. When people ask for environmental information, we need to consider the request under the EIR rather than the FOIA. In this case, I am of the view that information relating to major infrastructure proposals meets the definition of environmental information at regulation 2(1)(c) of the EIR because it is information about a measure that impacts the environment.

I have consulted colleagues in our Strategic Planning and Sponsorship teams for the West Coast. They have advised me that they do not hold any recorded information that meets your request. This is because Network Rail is currently assessing the potential impact on the network of some new station proposals, but has not carried out any specific assessments of a proposal for Meecebrook.

Please see below for some advice to help address each of your questions:

1) Please confirm if a new West Coast Mainline station has been agreed.

We have not made any agreements relating to a new station at Meecebrook. As mentioned above, our planners are carrying out work to assess the long-term impact of some new station proposals on the West Coast South route, but this work is not looking at developing the case for, or the deliverability of, a new station at Meecebrook in the short-to-medium term.

2) If it has not been agreed, what stage are proposals at?

There are currently no Network Rail proposals for a station at Meecebrook and our planners have advised that they have not been consulted with directly by Stafford Borough Council or Staffordshire County Council on this subject.

3) What would be the approximate total cost of a new station?

We are unable to advise on this point, as Network Rail has not assessed this.

4) Who would pay for this?

Again, we are unable to advise as we do not have any specific proposals for Meecebrook.

5) Does a new development on greenfield (instead of brownfield) fit with the Network Rail environmental strategy?

As we have not been involved in any proposals, this is not something Network Rail has looked at.

You may wish to find out more from Staffordshire County Council about their proposals – contact details are available at: [Contact - Staffordshire County Council](#)

If you have any enquiries about this response, please contact me in the first instance at [REDACTED]. Details of your appeal rights are below.

Please remember to quote the reference number at the top of this letter in all future communications.

Yours sincerely

[REDACTED]

You are encouraged to use and re-use the information made available in this response freely and flexibly, with only a few conditions. These are set out in the [Open Government Licence](#) for public sector information. For further information please visit our [website](#).

Appeal rights

If you are unhappy with the way your request has been handled and wish to make a complaint or request a review of our decision, please write to the Compliance and Appeals team at Network Rail, Freedom of Information, [REDACTED] or by email at [REDACTED]. Your request must be submitted within 40 working days of receipt of this letter.

If you are not content with the outcome of the internal review, you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner (ICO) can be contacted at Information Commissioner's Office, [REDACTED] or you can contact the ICO through the 'Make a Complaint' section of their website on this link: <https://ico.org.uk/make-a-complaint/>

The relevant section to select will be "Official or Public Information".

Intermodality



Web: www.intermodality.com



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From: Georgina Blackburn
Sent: 12 December 2022 10:57
To: Strategic Planning Consultations; Strategic Planning
Cc:
Subject: Representations to Preferred Options - Land at Horse Shoe, Gnosall
Attachments: Representations_Gnosall_Final Draft_12122022.pdf

Dear Sir or Madam,

Representations to Local Plan 2020-2040 Preferred Options Document – Land at Horse Shoe, Gnosall

On behalf of Richborough Estates, please find attached representations to the Local Plan 2020-2040 Preferred Options Document.

I would be grateful if you could confirm receipt of this email and the attachment.

Best wishes,
Georgina

Georgina Blackburn
Planner

 asterplanning.com





Response to the Stafford Borough Local Plan 2020-2040: Preferred Options

On behalf of Richborough Estates Ltd.

In relation to:
Land at Horse Shoe, Gnosall

12th December 2022



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APPENDICES

APPENDIX 1 - Site Location Plan

APPENDIX 2 – Illustrative Masterplan

APPENDIX 3 – Meecebrook: Review of Passenger Rail Station Proposals

Prepared By: Jon Power (Associate Partner)

Asteer Planning LLP, [REDACTED]

Version Draft v3

Date: 6th December 2022

INTRODUCTION

- 1.1 Thank you for providing an opportunity to comment on the Stafford Borough Council (herein referred to as “SBC” or “the Council”) Local Plan 2020-2040 Preferred Options Consultation (“Preferred Options”). Asteer Planning LLP (“Asteer”) acts on behalf of Richborough Estates Ltd (“Richborough”) in relation to land under its control at Horse Shoe, Gnosall (“the site”). The land in total extends some 5.57 hectares - a location plan of the site is illustrated below as Figure 1 and enclosed as **Appendix 1**.

Figure 1: Site Location Plan



- 1.2 These Representations have been prepared by Richborough to provide comments on the vision, spatial strategy and key policies of the Preferred Options; and to demonstrate the availability, suitability and deliverability of the Horse Shoe site to provide a high quality residential development as part of a balanced spatial strategy for Stafford.
- 1.3 The site represents a logical and appropriate extension to Gnosall and is highly sustainable, with a range of existing services and facilities located within close proximity to the site. The site provides an opportunity to deliver, if fully developed, circa 55 high quality family and affordable homes to which would support the vitality, viability and vibrancy of Gnosall and underpin a balanced spatial strategy that meets identified need across the Borough. It could deliver development that meets the highest standards of sustainable design, support enhancements in biodiversity and provide accessible / multifunctional community open space.

1.4 These Representations are separated into two parts, which include:

Part 1: Comments on the Preferred Options Local Plan & Evidence Base

1.5 Providing detailed comments on the Preferred Options Local Plan, including:

1. **The Development Strategy** – including the strategic direction of the Local Plan, the spatial strategy, settlement hierarchy and key strategic policies.
2. **Strategic Allocations** – critically analysing the suitability and deliverability of the proposed strategic allocations at the Meecebrook Garden Community and the Stafford Station Gateway.
3. **Site Allocations Policies** – providing comment on specific site allocations in Gnosall.

Part 2: Horse Shoe, Gnosall: A Deliverable Site

1.6 Demonstrating the availability, suitability and deliverability of the site at Gnosall to provide high quality residential development as part of a balanced spatial strategy for Stafford; including:

1. **Site Context** - a summary of the site in context, including its wider strategic positioning and a description of the site and its surroundings;
2. **Planning Policy Context** - a review of the site within the context of the adopted and emerging Local Plan and the reasons why, in policy terms, the site should be considered for allocation;
3. **Technical and Environmental Considerations** - analysis of the key technical and environmental considerations which will influence the development of the site, and which have informed the preparation of an Illustrative Masterplan.
4. **Deliverability and Benefits** - a summary of the availability, suitability and achievability of developing the site, and an articulation of the key benefits that the allocation of the site could deliver.

1.7 Richborough would welcome ongoing engagement with the Council as the preparation of the Local Plan is progressed and would be happy to discuss any feedback in relation to these representations or the site specific material submitted as part of this Representation and the Call for Sites process.

Part 1: Comments on the Preferred Options Local Plan

1 BACKGROUND & INTRODUCTION

1.1 The Preferred Options consultation was published for comment on 24th October 2022 and contains a range of information, evidence and policy direction on which comment is invited, including:

- **The Preferred Options Local Plan** – which includes housing and employment land requirements, the broad spatial distribution of these uses, proposed development allocations including strategic allocations at the Stafford Station Gateway and a new Garden Community at Meecebrook; and a range of draft planning policies on topics such as climate change, economic development, housing provision, transport and the environment; and
- **Evidence Base** - a range of new evidence base documents that support the emerging Local Plan’s spatial strategy, land allocations and detailed policies.

1.2 Part 1 of these Representations provide detailed comments on the Preferred Options and its supporting documentation, with particular reference to how it relates to Richborough’s site at Horse Shoe and its interrelationship with the wider Local Plan strategy and strategic context. These representations build upon previous submissions by Richborough that have sought to articulate the merits of the site in early Local Plan consultation, including:

- A Call for Sites submission and Illustrative Masterplan – submitted in January 2018; and
- A response to the “Scoping the Issues” consultation – submitted in September 2018.

2 THE DEVELOPMENT STRATEGY

2.1 This section provides a response to the Preferred Options overarching Development Strategy, including the scale and distribution of development needs and the proposed settlement strategy.

Development Needs

2.2 **Policy 1 (Development Strategy)** of the Preferred Options sets out that between 2020 and 2040, provision will be made for 10,700 new homes (equating to 535 new dwellings per annum (“dpa”)) and 80 hectares of employment land.

2.3 Richborough recognise that the identified housing need encompasses an uplift from the standard method requirement (391dpa) to account for ‘jobs based’ growth (to 435dpa) and to accommodate 2,000 units to meet the unmet needs of neighbouring authorities (an additional 100dpa). However, Richborough consider that this target is not ambitious for a Borough with unique strategic opportunities, and which will have a generational opportunity for growth following the arrival of HS2.

2.4 Lichfields has prepared an Economic and Housing Development Needs Assessment (“EHDNA”) to underpin Stafford’s development needs and inform its development strategy. It considers 7 scenarios for housing growth, ranging from the Government’s Standard method (408dpa¹) to accelerated jobs growth scenarios (up to 746 dpa). The two highest growth scenarios are:

- **Scenario E (Jobs Growth Regeneration):** supporting a requirement of 646dpa (or 711dpa including PCU²) – this scenario considers the implications of a new Garden Community and Stafford Station Gateway with respect to the jobs these developments are expected to generate.
- **Scenario F (Past Trends Scenario):** supporting a requirement of 683dpa (or 746 dpa including PCU) – this scenario that assumes that the CAGR³ rate of jobs growth of 0.83% experienced between 2000 and 2018 is continued over the Plan Period.

2.5 Richborough considers that, as a minimum, the housing need should reflect a level of jobs growth that supports regeneration and the delivery of the major strategic allocations identified in the emerging Local Plan. However, we believe that jobs growth over and

¹ Government LHN in 2020, when the EHDNA was published

² Partial Catch Up

³ Compound Annual Growth Rate

above past trends could occur over the forthcoming Plan Period, based on the exceptional growth potential of the Borough and, therefore, a housing need of **746dpa or above** should be considered to support a truly transformational Local Plan. Richborough considers that there is a compelling case to advocate strongly for a more ambitious housing target based on the following:

a) Supporting the Exceptional Growth Potential of Stafford

2.6 Stafford has enormous potential to catalyse its growth during the forthcoming Plan Period. The emerging Local Plan is an opportunity to support this growth, which if missed, could stifle the economic potential of Stafford for the next 30 years. The potential of Stafford is driven by:

- Its accessibility, strategic transport links and key strategic location as an anchor location between the West Midlands and the North;
- Major employment growth, both in traditional and logistics opportunities across the Borough, and in the regeneration opportunities that exist at the Stafford Station Gateway (and beyond); and
- The arrival of HS2 in Stafford which will allow travel between Stafford and London Euston in just 55 minutes, and which presents huge opportunities for the town, not only in the Stafford Gateway area, but across the Borough. A failure to provide the type and quality of homes and infrastructure to support the arrival of HS2 would be a major missed opportunity to set the platform to catalyse the future growth of the Borough for the next generation.

2.7 The Constellation Partnership, an alliance of 7 Local Authorities across Staffordshire and Cheshire⁴, prepared a Growth Strategy in 2018 which sought to deliver transformational economic growth, supported by the arrival of HS2, with accelerated growth envisaged across the region by 2040. The overarching Growth Strategy of the Constellation Partnership sought to support the delivery of at least 120,000 new jobs, 100,000 new homes and £6 bn per year of Gross Value Added (“GVA”) by 2040⁵ across the partnership area.

2.8 The Constellation Partnership Growth Strategy advocates for ‘accelerated’ housing delivery, over and above existing trends, stating that the area should deliver *“at least*

⁴ Including Stafford, Staffordshire, Newcastle-under-Lyme, Stoke-on-Trent, Staffordshire Moorlands, Cheshire East and Cheshire West and Chester

⁵ Constellation Partnership Growth Strategy (October 2018)

100,000 new homes, by accelerating the delivery of the 77,000 homes identified within Local Plans, on a series of key strategic sites which align with our objective of securing 'good growth', ensuring that the supply of housing delivers a broad range of new homes that are affordable and accessible to people where they need or choose to be⁶.

- 2.9 In addition, the Stoke-on-Trent and Staffordshire Local Enterprise Partnership ("SSLEP") prepared a Strategic Economic Plan ("SEP") in 2014 (updated in 2018) which also recognises the enormous growth potential of the region, including Stafford – seeking to grow the economy in the region by 50%, generating 50,000 new jobs between 2011 and 2021. The 2020-21 SSLEP delivery plan confirms that this ambitious target has been achieved, underlining the huge growth potential of the region.
- 2.10 Moving forward, Stafford is identified as a strategic priority as a "competitive urban centre" where it is envisaged to create *"the right mix of places that are attractive destinations to live, work and visit, underpinned by the right infrastructure⁷"*. The SSLEP fully recognises the role of new homes in supporting the growth potential of the region – where providing the type, mix and quality of new homes is critical in underpinning the diversity and scale of economic growth envisaged in Stafford. The SEP recognises this: *"Housing investment and delivery is vital to the economic prosperity of Stoke-on-Trent and Staffordshire. Supporting investment and infrastructure, including HS2, is critical to ensuring that the area really benefits from national investment⁸"*.
- 2.11 Simply put, a failure to provide suitable land for housing growth in the Local Plan will be a missed opportunity to capitalise on the once-in-a-generation growth potential of Stafford during the next Plan Period. A more ambitious housing target would ensure that this growth is realised and will catalyse the Borough's economy during the next 20 years.

b) Past Rates of Delivery

- 2.12 The EHDNA identifies that an average of 587dpa were delivered between 2001/02 and 2018/19, which includes a period of significant housing recession and exceeds the current target in the emerging Local Plan. Notwithstanding this, past trends also indicate that:
- Between 2001/02 and 2008/09 (pre-recession) an average of 661dpa were delivered; and

⁶ Constellation Partnership Growth Strategy (October 2018), p26

⁷ SSLEP Deliver Plan, p8

⁸ SEP (2018), p26

- In the last 4 reporting years (2015/16 to 2018/19) an average of 815dpa were delivered.

2.13 These trends suggest that there is significant demand and the potential for Stafford to continue to deliver higher levels of housing to meet this need – particularly in the context of the potential for catalytic growth over the next 20 years.

c) Affordable Housing Need

2.14 The EHDNA identifies an affordable housing need in the range between 252 and 389 affordable homes per annum between 2020 to 2040 for the Borough, which represents a significant proportion of the local housing need based on the standard method (408 dpa) and would require at least a 36% delivery rate even if the Regeneration PCU scenario of 711 dpa were pursued.

2.15 In addition, median affordability ratios (both residence and workplace-based) have generally increased over time, indicating worsening affordability⁹. Lower quartile ratios in Stafford are worse than median ratios, indicating that those on lower incomes may struggle to afford even lower priced properties.

2.16 In summary, if insufficient new homes are provided to meet increasing demand, then there is a risk that affordability levels will worsen for the next generation of residents in the Borough, and create significant negative social and economic outcomes. We consider that the evidence exists to support a more significant uplift in overall housing need to better address affordability and the delivery of new affordable homes during the next Plan Period.

Summary

2.17 In summary, Richborough consider that there are compelling reasons why a much higher housing need should be considered, based on the growth potential of the Borough, its past and current rates of delivery / jobs growth and a worsening affordability crisis. As such, we consider that **an annual housing need in excess of 746dpa should be considered.**

⁹ EHDNA, p120

The Settlement Strategy & Spatial Distribution

Settlement Hierarchy

2.18 Policy 2 (Settlement Hierarchy) sets out the Preferred Options proposed settlement hierarchy. Richborough's comments on the proposed settlement hierarchy are as follows:

- **Tier 1 and Tier 2** - Richborough supports the identification of Stafford (Tier 1) and Stone (Tier 2) at the top of the settlement hierarchy, which is in line with Government policy and reflects the size, scale and function of these settlements.
- **Tier 3** - Richborough strongly objects to the identification of Meecebrook Garden Community ("Meecebrook") as a stand-alone settlement at Tier 3 of the hierarchy. For the reasons set out in Section 3 of Part 1 of these Representations, we consider that Meecebrook is fundamentally unsustainable, unviable and undeliverable and, therefore, should be removed from the settlement hierarchy altogether.
- **Tier 4** - Richborough supports the identification of Gnosall as a 'larger settlement' which appropriately reflects its scale and importance as a key rural service centre in the Borough. However, as set out above, it is considered that larger settlements should form the 3rd tier of the settlement hierarchy.

Spatial Distribution

2.19 The Preferred Options identifies the spatial distribution of homes to meet its identified housing need across the Borough during the next Plan Period. Policy 1 (Development Strategy) sets out the broad distribution of housing supply across the Borough as follows:

- Stafford (59%).
- Meecebrook (24%).
- Stone (7%).
- Windfall (6%).
- Larger settlements (4%).
- Smaller settlements (<1%).
- Rural areas (<1%).

2.20 Just 4% of the Borough's housing supply is distributed to the 'larger settlements', such as Gnosall, which comprises 84 completions (between 2020 and 2022), 144 commitments

and only 234 homes in new allocations. Richborough considers that the spatial strategy and the distribution of new housing presents an imbalance. Larger settlements have a higher capacity for growth and a more balanced spatial strategy should deliver a higher level of growth in the Borough's larger settlements for the following reasons:

- **An inherent higher capacity for growth** – the Council's Revised Settlement Assessment and Profiles Topic Paper (2022) identifies Gnosall as the largest settlement outside of Stafford Town and Stone, with 1,903 dwellings. Both the Issues and Options and the appraisal of options in the SA considered a higher level of strategic growth in Gnosall, reflecting its size and status. The Council's Interim Sustainability Appraisal ("SA"), prepared in 2022, reflected on this stating that it was *"also considered reasonable and appropriate to consider the possibility of higher growth, noting that Gnosall benefits from relatively good connectivity to Stafford (also Newport and Telford to the west), including by bus, and given relatively few strategic environmental constraints¹⁰".* As such, Richborough consider that it has a higher capacity for growth than the 109 dwellings that are proposed to be allocated in Gnosall, which should be considered in the SA and site selection process as a Regulation 19 version of the plan is prepared.
- **To support vitality, vibrancy and viability** – to support growth and vitality and viability of the Borough's service centres, new residents and additional growth is required that allows them to evolve, meet their potential and to support new residents during the next Plan Period.
- **Meeting needs** – Richborough consider that a higher distribution of housing to the Borough's larger settlements would better meet the needs of the Borough. The Council's SA notes that in the 10 years between 2011-2022, 212 new homes came forward in Gnosall (12.4% of the housing stock)¹¹. This suggests a strong demand for homes in Gnosall, which if projected forward over the Plan Period, suggests that more than 400 homes could be delivered over the 20 year Plan Period, far in excess of the current draft allocation for 109 units. In addition, there is a need for more diversity and affordability in housing stock in the rural area (and outside of Stafford where viability is an issue) – which could be met by deliverable and viable sites that can deliver a mix of types and tenures of homes early in the Plan Period.

¹⁰ Sustainability Appraisal (Appendix VI), p117

¹¹ Sustainability Appraisal (Appendix VI), p117

Summary

- 2.21 In summary, Richborough make the following overarching comments on the Preferred Options proposed Development Strategy:
1. Richborough consider that **there is a compelling case to adopt a more ambitious housing need target, of 746dpa or higher**, to deliver Local Plan that grasps the opportunity that the next Plan Period presents – supporting the exceptional potential for growth, reflecting the evidence of past trends and addressing affordability and affordable housing need;
 2. Richborough **strongly objects to the identification of Meecebrook Garden Community as a stand-alone settlement at Tier 3 of the settlement hierarchy** – which is fundamentally unsustainable, unviable and undeliverable and, therefore, should be removed from the settlement hierarchy; and
 3. Richborough supports the identification of Gnosall as a ‘larger settlement’ in the settlement hierarchy, however, there is an imbalance in the spatial strategy and the distribution of new housing. Richborough consider that **larger settlements, and in particular Gnosall, have a higher capacity for growth** and should accommodate additional growth to support a more balanced spatial distribution of housing.

3 STRATEGIC ALLOCATIONS

3.1 The Preferred Options proposes four major strategic site allocations, which will deliver 8,329 units, comprising:

- Meecebrook – 3,000 units;
- North of Stafford – 2,700 units;
- West of Stafford – 1,729 units; and
- Stafford Station Gateway – 900 units.

3.2 Richborough consider that there are significant question marks over the deliverability of these allocations, particularly the Meecebrook Garden Community and the residential elements of the Stafford Station Gateway. Our overarching comments on these proposed allocations are provided as follows:

Meecebrook Garden Community

3.3 Richborough **strongly objects to the selection of Meecebrook as a feasible, realistic or deliverable strategic site.** It represents an isolated greenfield development that has transformed from what was a partially brownfield development (on the site of the MOD Swynnerton Training Area) at the Issues and Options stage of the Local Plan, to an entirely greenfield development. Much of the SA's consideration of Meecebrook is predicated on the delivery of the extensive suite of infrastructure, not least a new rail station on the West Coast Mainline, which for the reasons set out in this response is neither feasible nor deliverable. As such, it is considered that the SA is flawed and should be revisited as the Regulation 19 stage of the Local Plan is prepared.

3.4 The following commentary sets out the key reasons why Meecebrook should be removed as an allocation and a more balanced spatial strategy, that directs additional growth into Stafford, Stone and the Borough's larger settlements, should be adopted.

Site Selection

3.5 Firstly, it is not clear how Meecebrook has been reduced/amended from a site with a large element of brownfield land (the MOD land) to a predominantly greenfield site – as the Local Plan has moved from Issues and Options stage to Preferred Options – without a full and transparent assessment of how this has impacted on the initial selection of the site. The change in the site parameters has also reduced the site capacity from 11,500 dwellings to 6,000 dwellings, which significantly undermines the case for major

infrastructure (such as the Rail Station) and reduces the significant benefits envisaged in the original Cold Meece 'Garden Village' proposals.

- 3.6 It appears that the main reason for the change in site area and strategy is land availability, with the SA stating that *"there are issues with regards to land availability, with extensive areas of land thought to be available at the time of the Issues and Options consultation (following a call for sites) now unavailable (specifically MOD land at Swynnerton Training Area, and farmland in the vicinity of Upper Heamies). This led the Council to undertake further work to explore land availability, following the Issues and Options consultation, which led to additional land being identified as available. The net effect is that the current site 'red line boundary' is shifted significantly to the west, in the direction of Eccleshall, relative to the assumed red line boundary at the time of the Issues and Options consultation¹²".*
- 3.7 The SA goes on to acknowledge the risks and uncertainties associated with a 6,000 home scheme, stating that (Asteeer **emphasis** added) *"Within this adjusted red-line boundary there is capacity for at least 6,000 homes, at which scale there would be the potential to deliver a range of strategic infrastructure, likely to include a train station (detailed feasibility work has been completed, but **there remain risks and uncertainties**). However, **a 6,000 home scheme could have drawbacks relative to a scheme of up to 11,500 homes, as previously envisaged¹³".***
- 3.8 Richborough consider the assessment of the site in the SA and the site selection process to be fundamentally flawed, due to:
- No re-consideration of whether the site would be initially selected without brownfield land, or without initial Government funding to support a site that included the MOD land.
 - A predetermined approach in the SA that assumes that all infrastructure, including a rail station, will be delivered – despite the flagged risks and clear uncertainties. As set out below, we consider some of these elements of infrastructure, and therefore Meecebrook, to be undeliverable; and therefore a revision of the SA is required.

¹² Interim Sustainability Appraisal, p76

¹³ Interim Sustainability Appraisal, p76

- A lack of full consideration of the dis-benefits of amending the site area in terms of no longer utilising brownfield land (in line with Government policy) and the real impact on benefits in reducing from a garden village (11,500 homes) to a garden community.

3.9 In summary, we consider that a pre-determined strategy, supported by initial Government funding, has led the Council to pursue Meecebrook; even as the initial benefits in terms of brownfield use and the scale of development, have been eroded.

Sustainability and Accessibility

3.10 Meecebrook represents an isolated and, without a new rail station, a wholly unsustainable location for growth. The SA fully recognises that in sustainability and accessibility terms, Meecebrook would not be deliverable without a new rail station on the West Coast Main Line, stating that (Asteer **emphasis** added): ***“should it be the case that delivery of a train station cannot be guaranteed, then the transport merits of the site decrease significantly. Staffordshire County Council stated clearly through the Issues and Options consultation (2020): A new Garden Community at Meecebrook would require a new rail station to prevent it from becoming a car dominated settlement¹⁴.”*** It also states that *“without a train station then the ‘transport’ merits of a 6,000 home scheme in this location are questionable, as links to higher order settlements would be far less strong (also an unmet needs consideration)¹⁵”*.

3.11 Also, Meecebrook was previously considered to require a new Junction on the M6 to provide adequate access to the strategic highways network, with the Council’s Strategic Development Site Options (2019) stating that a potential infrastructure requirement of the site was “a new junction on M6 with link to site”. This requirement is not considered in the Preferred Options and it is unclear what impact Meecebrook would have on the local road network without a suitable and direct access to the strategic highways network.

3.12 As set out below, it is considered that a new rail station at Meecebrook is not deliverable and, therefore, the development of the site would lead to an isolated, car borne development that is neither accessible nor sustainable.

New Rail Station Feasibility

3.13 A review of the new passenger rail station proposals for Meecebrook has been undertaken by Intermodality, a specialist transport consultancy, which is provided at **Appendix 3** of these Representations. This review provides a critique of the rail feasibility work

¹⁴ Interim Sustainability Appraisal, p61

¹⁵ Interim Sustainability Appraisal, p100

undertaken by the Council to date¹⁶, and draws conclusions on the overall feasibility of delivering a new passenger rail station on the West Coast Main Line (“WCML”), which as set out previously, is critical to the delivery of a new Garden Community at Meecebrook.

3.14 Conclusions drawn by Intermodality identify significant issues and risks associated with the delivery of a new multi-platform rail station on the WCML, including:

- The intensity of current rail services on the WCML, the ‘Backbone of Britain’, the busiest mixed-use railway in Europe with a nationally-significant role for moving passengers and freight;
- A series of major upgrades to the WCML have been undertaken in recent years to improve capability and reduce journey times, including a major grade-separated junction at Norton Bridge, but without any provision being made in the previous or current strategy for any new station at Meecebrook;
- Engineering access on the WCML, which shuts either the fast or slow lines passing the site, would necessitate a 4-platform station to be constructed for network operational reasons, but which would not otherwise be justified commercially, adding substantially to the complexity, cost and risk of delivering the station, relative to the size of the adjacent development which would need to fund and sustain it;
- Current signalling not being suitable in capacity or location to accommodate a new station, and as such adding to the complexity, cost and risk of delivering the project, in terms of new and altered signalling;
- A new station would abstract demand and revenue from existing stations;
- The need for the entire development to be completed (which might not occur for another 30 years) in order to generate sufficient critical mass of demand, with no indication in the reports on how / who would cover the financial losses in the intervening period;
- The ability to fund and deliver rail enhancements in the current climate, with SLC noting recently the impact of the COVID19 pandemic and its long term impact on working practices and passenger demand;

¹⁶ Including the Meecebrook Garden Community Transport Strategy, July 2020 (Atkins); Pre-Feasibility Report V0.1, March 2022 (SLC Rail); Feasibility Report v1.0, July 2022, updating work in the March 2022 report (SLC Rail).

- The conclusion from Atkins that, even if the station were to be delivered, the development would still generate considerable levels of highway trips, requiring further mitigation measures;
- The conclusion of SLC that the station business case would achieve a BCR of 1.5, at the low end of the range for “medium” value for money.

3.15 Notwithstanding the fact that these are significant issues that in isolation undermine the feasibility and deliverability of a new station, it is also apparent that there has been complete lack of early (or any) engagement with the rail industry, especially with Network Rail as the licenced, regulated manager of the national rail network. This fundamentally undermines the deliverability of a new station and there can be no confidence that a new station is achievable in terms of delivery, technical/engineering feasibility or value for money; and therefore the delivery of Meecebrook is neither feasible nor sustainable.

Deliverability

3.16 Notwithstanding that we consider a new rail station to be unfeasible, as set out above, which would render Meecebrook fundamentally undeliverable and unsustainable; there are also significant infrastructure and other obligations that would need to be delivered to support a sustainable and liveable new community. These include (but are not limited to):

- A secondary school, primary schools and nursery provision;
- A health care facility with GP, dentist and pharmacy;
- A flexible, multi-purpose building for use by the community;
- Community hubs / facilities;
- A place of worship;
- Indoor and outdoor sport provision;
- Off-site highways infrastructure upgrades necessary to mitigate the impact of the development on the highway network; and
- The creation of new habitats for biodiversity, public open space and play space.

3.17 The delivery of this infrastructure and the required affordable housing provision would present significant challenges to delivering a new community based on overall viability. The SA states that (Asteer **emphasis** added) ***“Delivery risk at Meecebrook is a consideration, with the Viability Assessment (2022) concluding (assuming 40%***

affordable housing): ***“Meecebrook is marginally viable. Further discussions and engagement are needed with the identified landowners to solidify a red line boundary and manage expectations”¹⁷.*** The Council’s Viability Assessment (2022) states that for Meecebrook to viably deliver 40% affordable housing, it would *“need to forgo the provision of all M4(2) and M4(3) accessible housing, Net Zero extra over interim FHS Interim Uplift and provision of electric vehicle charge points”*. This would clearly be contrary to policy objectives and highlights the marginal viability of Meecebrook.

- 3.18 In addition, the site is in multiple landownerships and there are no agreements in place or clarity on the mechanisms for delivery. In terms of viability and deliverability, the Council’s Viability Assessment gives Meecebrook a red RAG rating, stating that (Asteer **emphasis added**) ***“Meecebrook is constrained by the lack of clarity around landowner commitment and the unknown costs of infrastructure. It is important that landowners engage continuously in this process and further work is undertaken regarding infrastructure requirements. If landowners are not ‘on board’, or their financial expectations quantified, the delivery of this scheme is at risk”¹⁸.***

Delivery

- 3.19 Richborough consider that the Council’s Housing Trajectory for Meecebrook, at Appendix 6 of the Preferred Options, is wholly unrealistic. It assumes that the scheme will deliver 300 units per annum, starting from 2030/2031 – totalling 3,000 units over the last 10 years of the Plan Period. We consider this to be wholly unrealistic for the following reasons:
- A Framework Masterplan Supplementary Planning Document must be put in place to understand the infrastructure requirements, phasing and constraints to development; as well as setting the design and development principles that would frame the garden community. In our experience, this could take 1-2 years to be adopted following approval of the Local Plan – which could mean that an SPD is not in place until 2026/27.
 - Part L of Policy 7 (Meecebrook) states that *“development can only commence once a route to funding and delivery in line with the phasing set out in the Framework Masterplan Supplementary Planning Document has been identified for the railway station; primary and secondary schools; electricity, gas, clean and wastewater and on-site renewable energy systems; and any necessary strategic highways infrastructure upgrades”*. There is the potential for certainty in funding and delivery (notwithstanding

¹⁷ Interim Sustainability Appraisal, p67

¹⁸ Viability Assessment (2022), p86

that we consider the rail station to be undeliverable) to take a number of years, particularly given the complexity of delivering a new station on the West Coast Main Line; which will significantly impact on any lead-in times to development.

- Lichfields “Start-to-Finish” Report (2020) is a well-known industry barometer for understanding the lead in times to development. It estimates that sites of 2,000 units or more take an average of 8.4 years from the validation of the first planning application, to the delivery of the first dwelling. On this basis, if an application were validated now, it would be unlikely to be delivering homes in 2030/31 as set out in the Housing Trajectory.

3.20 Even taking the most optimistic scenario and assuming the new rail station is feasible, we consider that the delivery of Meecebrook would not be possible before the late 2030’s, based on:

- Local Plan adoption – end 2024 (LDS).
- Adoption / endorsement of the Meecebrook SPD – 2026/27.
- Possible timescale for clarity on rail funding and delivery – 2031/32 (c. 6 years post-adoption), followed by a significant lead-in to construction and delivery (realistically, this would be significantly longer, based on the lack of engagement with Network Rail.
- Validation of first application – 2031/32
- Delivery of first home – 2039/40.

3.21 Based on the above, even if Meecebrook is feasible and deliverable (which we do not consider to be the case), it is very unlikely to be delivering any units until the end of the Plan Period.

Environmental Impacts

3.22 Notwithstanding the fundamental issues with the feasibility and deliverability of Meecebrook, it also has the potential to have a significant environmental impact, due to the scale of development in a greenfield location which is isolated and has inherent environmental and physical constraints. These impacts have not yet been fully assessed or understood, but the Council’s evidence base does acknowledge significant constraints that the delivery of Meecebrook would need to address – particularly due to the site area switching from a brownfield to greenfield development. Key issues include:

- **Biodiversity** – the Council’s SA recognises the potential for the development of Meecebrook to impact on designed habitats, which has increased since the site boundary has been amended, noting that: *“there are wide-ranging considerations in respect of locally designated habitats (Sites of Biological Importance, SBIs) and non-designated ‘priority habitats’ (a national dataset is available, but is somewhat dated and low accuracy). This largely relates to the fact that development would be focused on the Meece Brook corridor, and the effect of shifting the site red-line boundary to the west and to the south, since the Issues and Options stage, is potentially to modestly increase the concern regarding impacts to the Meece Brook SBI.... the effect of moving the site boundary to the west is to increase concern regarding impacts to the sensitive Mill Meece area (specifically land west of the village of Millmeece, and west of the railway line).¹⁹”*
- **Heritage** – the Council’s Strategic Development Site Options (2019) note that Meecebrook contains a number of listed buildings which would require their setting to be protected and enhanced. At this stage, there is limited information or assessment that considers the impact on historic assets, or how they would be fully protected and preserved.
- **Landscape impact** – the Council’s 2021 Landscape Sensitivity Study, considered Meecebrook, but assessed the site which included the MOD land, which was considered to be less sensitive in landscape terms. The SA states that (Asteer **emphasis** added) *“study was completed in 2021 to evaluate landscape sensitivity, which concluded ‘medium’ sensitivity overall. However, the study examined the site previously under consideration for 11,500 homes, to include the MOD land, which has relatively low landscape sensitivity. **Most of the land examined in 2021 that falls within the current site boundary was found to have ‘medium / high’ sensitivity overall²⁰”***. This again demonstrates how the evidence base does not support the amended Meecebrook boundary, which will have significant biodiversity and landscape impacts. The development of the site also potentially risks coalescence between Yarnfield, Coldmeece and Sturbridge.

3.23 Overall, there is limited evidence base assessment work that has been undertaken to underpin or justify the Meecebrook allocation – particularly now the site boundary has been fundamentally altered to exclude the MOD land. Richborough consider that the site

¹⁹ Interim Sustainability Appraisal (2022), p46

²⁰ Interim Sustainability Appraisal (2022), p94

is likely to have very significant environmental impacts, when compared to alternative growth options.

Stafford Station Gateway

3.24 Whilst Richborough supports the delivery of the Stafford Station Gateway, as a predominantly brownfield site in a highly accessible location, there are concerns over the viability and deliverability of the proposed residential elements of the scheme. Our key concerns relate to:

- **Viability** – it is considered that further work is required to understand the viability of the Stafford Station Gateway, which is considered to be marginal. The SA states that (Asteer **emphasis** added) *“the range of issues and constraints affecting Stafford Station Gateway could indicate that affordable housing delivery may prove challenging. The Viability Study (2022) assumes 20% affordable housing, and concludes: **Station Gateway is marginally viable. The large number of landowners may lead to complexities with collaboration and equalisation agreements which puts the site at risk**²¹.”* In addition, the Council’s Viability Assessment gives Stafford Station Gateway a red RAG rating, stating that *“Station Gateway is constrained by the lack of clarity around infrastructure. It is important that further work is undertaken regarding infrastructure requirements so that we may accurately model the implication on viability²²”*.
- **Land Assembly** – as touched upon above, there is significant uncertainty around the complexity of landownerships in the gateway area. Land assembly and CPO would have a significant impact, not only on viability, but on the lead-in times and assumed rates of delivery.
- **Delivery** – we consider that the Council’s Housing Trajectory for the Station Gateway, at Appendix 6 of the Preferred Options, is challenging. It assumes that units will be delivered on the site in 2028/2029 – just 3-4 years following the adoption of the Local Plan. Based on Lichfields “Start-to-Finish” Report (2020), sites of 500 units or more take an average of 5.0-8.4 years from the validation of the first planning application, to the delivery of the first dwelling. Factoring in the preparation of an application (and assuming that land ownership issues are resolved), this means that it is unlikely that

²¹ Interim Sustainability Appraisal (2022), p57

²² Viability Assessment (2022), p86

any homes could be delivered before 2030/31 – 6 years post-adoption – in a best case scenario.

Summary

- 3.25 In summary **Richborough strongly objects to the identification and allocation of Meecebrook as a strategic site** – which has been selected based on a pre-determined site selection process; and which is fundamentally unsustainable, inaccessible and undeliverable. **Richborough also has some concerns over the viability and deliverability of the residential elements of the Stafford Station Gateway**, which has significant issues with land ownership and viability.
- 3.26 **Richborough considers that a more balanced spatial strategy could be achieved by removing the Meecebrook strategic allocation and delivering dispersed and sustainable growth across the Borough's larger settlements.** A further assessment of the viability and deliverability of the Stafford Station Gateway proposals should be undertaken to confirm the level of development assumed can indeed be delivered within the time period envisaged.

4 SITE SELECTION & ALLOCATIONS

4.1 The Council sets out its site selection process, which underpins the Preferred Options draft site allocations, in the following evidence base documents:

- Site Selection Topic Paper (October 2022);
- Site Assessment Profiles (October 2022);
- Strategic Housing and Employment Land Availability Assessment (August 2022); and
- Stafford Borough Local Plan Interim Sustainability Appraisal (October 2022).

4.2 These Representations draw on these documents to make comment on the proposed site allocations and the site selection process – as it relates to Gnosall and, in particular, the proposed allocation at Land East of Stafford Road (GN002 West) and Richborough’s site at the Horse Shoe (GN005).

Site Selection Methodology

4.3 The Council’s Site Selection Topic Paper sets out that 290 sites were assessed, based on the following methodology²³:

- *Stage 1: Sites with constraints rendering them non developable were rejected. If possible, site boundaries were adjusted to exclude constraints. 217 sites progressed to stage 2.*
- *Stage 2: Sites not within or adjacent to a settlement identified in the settlement hierarchy were rejected. 156 sites progressed to stage 3.*
- *Stage 3: Potential dwelling yield for each site is calculated, and site information is sent to external consultants and other consultees to form part of the local plan evidence base.*
- *Stage 4: Evidence-based decision to select or reject sites. 57 sites progressed beyond this stage.*

Site Assessment: GN005 (Land at the Horse Shoe)

²³ Site Selection Topic Paper (October 2022), p4

4.4 The Council Site Assessment Profiles (2022), which support the Preferred Options, list the sites which passed Stage 2 of the site assessment process. Site GNO05 is concluded to be a 'Potential Site Option' with the following comments under each topic area²⁴:

- **Education** - Primary School: Gnosall St. Lawrence CE Primary Academy. Development can be accommodated within existing capacity. Secondary School: King Edward VI High School. Development can be accommodated within existing capacity.
- **Transport** - Access into the site could be achievable but there are concerns over the impact on the surrounding network which would need to be investigated. Accessibility Score: 5/6.
- **Ecology** - Medium / Low overall ecological sensitivity. Amber Great Crested Newt risk impact zone.
- **Landscape** - Medium overall landscape sensitivity.
- **Heritage** - Low direct impacts, Medium setting impacts. No substantial harm.
- **Water** - Low potential impact on sewerage infrastructure. Low potential impact on surface water sewerage infrastructure.
- **Electricity** - There could be a potential issue with accommodating a large amount of growth in Gnosall in the short term, after 2030 it is likely doable.

4.5 The assessment clearly demonstrates the limited constraints that impact the site, which are reinforced and further demonstrated in Part 2 of these Representations. Furthermore, the site was considered to be available, suitable and achievable in the Council's Strategic Housing and Employment Land Availability Assessment ("SHELAA"), concluding that *"the site is potentially developable based on the compliance with Policy C5 of the Local Plan and Paragraph 72 of the NPPF²⁵"*.

Site Selection Process

4.6 As set out above, the site has been considered as a potential site option with limited constraints to its delivery. However, it is unclear, based on the published evidence base, why the site was ultimately excluded or discounted.

²⁴ Site Assessment Profiles (October 2022), p81

²⁵ SHELAA (August 2022), p129

4.7 The Council's Interim Sustainability Appraisal considers the 'Site Options' and 'Site Settlement Scenarios' in Sections 5.3 and 5.4 of the SA respectively. In Paragraph 5.3.4 of Section 5.3 the SA states that of the 57 sites that progressed beyond Stage 4, all were *"given detailed consideration within: the SBC Site Assessment Profiles document; the SBC Site Selection Topic Paper; and Section 5.4"*.

4.8 Section 5.3 of the Council's SA considers the 'Site Options'. It identifies the Horse Shoe site as a "short-listed: housing or mixed use site", with and the table at Page 104 of Appendix V of the SA identifying the site as "being progressed beyond Stage 4" of the site selection process (i.e. one of the 57 sites). Following this, it is unclear why specifically the site was discounted following this stage. Section 5.4 of the report goes on to assess settlement scenarios and includes only two scenarios for Gnosall:

- **Scenario 1:** 109 homes (Current Preferred Option); and
- **Scenario 2:** 463 homes (Current Preferred Option, plus 354 homes to the south of the proposed allocation – between the A518 and the disused railway line, within the open countryside).

4.9 Appendix VI provides more detail on settlement scenarios and states the following in relation to the site²⁶:

"GNO05 (Land at The Horse Shoe; 101 homes) – does not relate well to the village built form, being associated with an area historically known as Audmore, and bounded on all sides by a historic lane. Also, a public right of way passes through the land, indicating landscape sensitivities, and there are transport constraints in terms of traffic travelling north from the site out of Gnosall and beyond".

4.10 However, beyond this, it is difficult to understand how the site was discounted after Stage 4 and was ultimately less preferable to other site that were assessed in the settlement scenarios, including the allocated site. A further assessment of how the Horse Shoe site performs in the Council's own assessment, when compared to the proposed allocation (GNO04 west), is provided below.

²⁶ Sustainability Appraisal, Appendix VI, p118

Horse Shoe (GN005) and Land East of Stafford Road (GN004 West)

- 4.11 As set out above, the site selection process is not clear in how the final preferred allocation was chosen. The Council's Site Assessment Profiles (October 2022) assesses both site GN005 and GN004 (west) based on topic areas and its own evaluation. The findings of this assessment are presented with a RAG analysis providing Richborough's interpretation of this assessment for visual comparison purposes:

Topic Area	Evaluation (GN004 west)	Evaluation (GN005)
Education	<p>Primary School: Gnosall St. Lawrence CE Primary Academy. Development can be accommodated within existing capacity.</p> <p>Secondary School: King Edward VI High School. Development can be accommodated within existing capacity.</p>	<p>Primary School: Gnosall St. Lawrence CE Primary Academy. Development can be accommodated within existing capacity.</p> <p>Secondary School: King Edward VI High School. Development can be accommodated within existing capacity.</p>
Transport	<p>Single access point required. Contribution towards home to school transport likely. Deliver new bus stops along A518 to provide access to existing service.</p> <p>Accessibility Score: 4/6</p>	<p>Access into the site could be achievable but there are concerns over the impact on the surrounding network which would need to be investigated.</p> <p>Accessibility Score: 5/6</p>
Ecology	<p>Medium / Low overall ecological sensitivity.</p> <p>Red Great Crested Newt risk impact zone.</p>	<p>Medium / Low overall ecological sensitivity.</p> <p>Amber Great Crested Newt risk impact zone.</p>
Landscape	<p>Medium overall landscape sensitivity.</p>	<p>Medium overall landscape sensitivity.</p>
Heritage	<p>Low direct impacts, Medium setting impacts.</p> <p>No substantial harm.</p>	<p>Low direct impacts, Medium setting impacts.</p> <p>No substantial harm.</p>
Water	<p>Low potential impact on sewerage infrastructure.</p> <p>Low potential impact on surface water sewerage infrastructure.</p>	<p>Low potential impact on sewerage infrastructure.</p> <p>Low potential impact on surface water sewerage infrastructure.</p>
Electricity	<p>There could be a potential issue with accommodating a large amount of growth in Gnosall in the short term, after 2030 it is likely doable.</p>	<p>There could be a potential issue with accommodating a large amount of growth in Gnosall in the short term, after 2030 it is likely doable.</p>

- 4.12 As demonstrated, GNO04 (west) scores less favourably than the Horse Shoe site in terms of its accessibility and ecology risk.
- 4.13 Furthermore, Appendix V of the SA provides a GIS analysis of site options which provides insights into trends across the data for a range of key metrics and seeks to categorise / differentiate the performance of site options on a red-amber-lightgreen-green (RAG) scale. A snapshot of this analysis for sites GNO04 (west) and GNO05 is illustrated as follows:

Ref.	Area	SAC	Ramsar	SSSI	SBI	Priority habitat	AONB	Green Belt	Agricultural land	Flood risk	Conservation area	G1 listed building	G2* listed building	G2 listed building	RPG	Scheduled monument	Town centre	Neighbourhood centre	REI	PEL	Local Green Space	IMD
GNO04 (West)	5.6	Light Green	Amber	Amber	Amber	Green	Green	Green	Light Green	Green	Red	Amber	Green	Green	Green	Green	Red	Light Green	Red	Red	Green	Amber
GNO05	5.6	Light Green	Amber	Amber	Light Green	Green	Green	Green	Light Green	Green	Amber	Light Green	Green	Green	Green	Green	Red	Light Green	Red	Red	Green	Amber

- 4.14 Again, there are marginal differences between the site assessments, with GNO04 (west) scoring less favourably in terms of proximity to an SBI, proximity a Conservation Area and proximity to Grade I and Grade II listed buildings; whilst GNO05 score marginally less favourably in terms of proximity to a neighbourhood centre. Lastly, both sites in the SHLAA are considered to be *“potentially developable based on the compliance with Policy C5 of the Local Plan and Paragraph 72 of the NPPF”*.

Summary

- 4.15 In summary, Richborough would make the following comments in relation to the site allocations and site selection process as it relates to Gnosall:
- The **Horse Shoe (GNO05) has limited constraints that impact the site and is considered to be available, suitable and achievable** in the Council’s SHLAA;
 - The Council’s site selection process for Gnosall is unclear and inconsistent. There is **no justification for site GNO05 being omitted when considered against other sites that were assessed in the Council’s SA settlement scenarios**, including the proposed allocation.
 - When **comparing the proposed allocation (GNO04 west) against GNO05, the Council’s own Site Assessment Profiles score the Horse Shoe site more favourably in terms of its accessibility and ecology risk, than the proposed allocation.** Other

evidence base assessments (the SA and the SHELAA) also provide no indication as to why GNO04 (west) is more suitable for allocation.

- 4.16 On the basis of the above and the information contained in these Representations, Richborough consider that if further land is not allocated in the Borough's larger settlements, then **the Horse Shoe site (GNO05) is more preferable for allocation than land South of Stafford Road (GNO04 west).**

Part 2: Land at the Horse Shoe, Gnosall: A Deliverable Site

1 THE SITE IN CONTEXT

- 1.1 The site forms a natural and logical extension to the north east of Gnosall, approximately 9km to the west of Stafford. The site has direct access to the existing strategic road network (via the Horse Shoe and Glebe Lane, which connect to the A518) and provides an excellent opportunity to deliver a balanced pattern of development that will contribute positively to achieving the emerging Local Plan's strategic objectives by meeting local needs, supporting the organic growth of Gnosall as one of Stafford largest settlements; and contributing positively to the vibrancy and vitality of the village.

Strategic Context

- 1.2 Stafford Borough is strategically located at the heart of the Stoke-Staffordshire region and is exceptionally well positioned to be at the heart of wider regional growth. It has excellent highways and rail connectivity and has inherent physical and economic links to the North West and West Midlands regions, with close geographical accessibility to Stoke-on-Trent, South Cheshire and Staffordshire.
- 1.3 The Borough's geography, coupled with its excellent road and rail links, means that it is exceptionally well positioned to act as a catalyst for wider regional growth, which capitalises on its locational advantage and will be further bolstered by HS2, which will allow travel between Stafford and London Euston in just 55 minutes.
- 1.4 The arrival of HS2 in Stafford presents huge opportunities across the Borough. Providing the type and quality of homes and infrastructure to support the arrival of HS2 will set the platform to catalyse the future growth of the Borough for the next generation. These opportunities are recognised by the Constellation Partnership Growth Strategy and the SSLEP, which envisages the arrival of HS2 to support the delivery of at least 120,000 new jobs, 100,000 new homes and £6 bn per year of Gross Value Added ("GVA") by 2040.
- 1.5 There is a clear opportunity for the Borough to grow during the next Plan Period; supported by its strategic location, excellent connectivity and its generational growth catalysts, such as HS2. It is fundamental that this growth is underpinned by the type and quality of housing and infrastructure that will realise its potential, supporting the growth of Stafford by delivering a balanced spatial strategy that meets need and provides housing choice across the whole Borough.

The Site & Surroundings

- 1.6 The site itself extends some 5.57 hectares and comprises two agricultural pasture fields separated by a mature hedgerow. The perimeter of the site is also bounded by mature

hedgerows, with some residential gardens backing onto the site. There are several trees scattered sporadically located along the existing hedgerow.

- 1.7 The south and west of the site is characterised by the Horse Shoe public highway, which is also known colloquially as the Audmore Loop. Also to the west is the established residential area of Gnosall. To the north are linear residential properties that from Horse Shoe and to the east are arable fields and agricultural uses bounded by the eastern extent of the Horse Shoe loop.

Accessibility

- 1.8 The site is in a highly accessible and sustainable location, within walking distance of a number of existing services and facilities that are accessible to the site in Gnosall. The following services and facilities are within 1km of the site, which is below recommended maximum acceptable walking distances for common trip purposes:

- A Doctors Surgery;
- 2 Dental Surgeries;
- 3 Food Retail stores;
- 2 Restaurants/Cafes;
- 2 Nurseries;
- A Primary School;
- 3 Children's Play Areas;
- A Public House; and
- A Post Office.

- 1.9 The site is uniquely positioned to provide new homes that will strengthen the vibrancy and vitality of Gnosall, contributing positively to the creation of a strong local economy and providing new homes that benefit from good accessibility.

Transport Accessibility

- 1.10 The main bus service through Gnosall is service 481 between Stafford, Newport and Telford. The service can be accessed from flag stops on Manor Road to the south of the site. The number 481 service operates a service every 30 minutes during the day (Monday-Saturday) and every hour on Sundays. The 483 service also runs along Manor

Road and is known as the West Staffordshire Link. The service runs from Gnosall Heath and Gnosall to Ranton, Seighford, and back towards Gnosall; operating 6 times per day (Monday-Saturday).

- 1.11 Stafford Train Station is approximately 7 miles from Gnosall and accessible via the 481 bus service. The station provides regular services to Manchester, Liverpool, Bristol, Birmingham, and to intermediate stations. The station has a large pay-for-parking car park and also provides secure cycle stands with CCTV coverage.
- 1.12 Gnosall also lies on a traffic-free cycle route between Stafford and Newport (NCN Route 55); the route can be accessed on Station Road. Just to the east of Newport the route continues (mostly) on-road towards Telford where an extensive network of traffic free routes can be accessed around the town and its environs.
- 1.13 In summary, the site is accessibly located, with excellent transport connectivity that can utilise a range of modes of transport.

2 PLANNING POLICY POSITION

- 2.1 The emerging Stafford Local Plan offers an opportunity for the Borough to plan its future growth in locations that are sustainable and which complement a spatial strategy that directs need to the locations where is required. Gnosall is identified as being a 'Larger Settlement' and is third in the settlement hierarchy to only Stafford and Stone in the emerging Local Plan settlement hierarchy; presenting an appropriate location for sustainable growth to support a balanced spatial strategy.

Adopted Development Plan

- 2.2 The current Development Plan for Stafford Borough includes the Plan for Stafford Borough (adopted in June 2014) and the Plan for Stafford Borough - Part 2 (adopted in January 2017). Richborough supports a full review of the Local Plan to deliver an updated Development Plan that can appropriately plan for the long term spatial growth and identified needs of the Borough. The site is within the Open Countryside in the adopted Development Plan.

The Case for Allocation

- 2.3 The site presents an excellent opportunity for sustainable development via a logical and natural extension to Gnosall and, therefore, there is a strong case for the allocation and subsequent development of the site during the next Plan Period. The site offers the potential to deliver a sensitive development that delivers a sustainable level of growth in Gnosall as a Tier 3 'larger settlement' in the emerging Local Plan. The remainder of this section provides a summary of the reasons why, in policy terms, there is a case for allocating the site for residential development.

Supporting a Balanced Spatial Strategy

- 2.4 At present, Richborough considers that there is an imbalance in the spatial strategy and the distribution of new housing - where larger settlements have a higher capacity for growth than is currently identified in the Preferred Options. A strategy that delivers just 109 homes in Gnosall, as the third largest settlement in the Borough, will not deliver a level of development that will meet the needs of the next generation of residents. Delivering additional growth in the Borough's sustainable large settlements will support vitality, retain the Borough's residents; and should be considered favourably when assessed against unsustainable and fundamentally undeliverable options, such as Meecebrook.

A Logical Extension to Gnosall

- 2.5 The site is well located in terms of its functional relationship with the 'larger settlement' of Gnosall, forming a natural extension to the village, that is fully enclosed by Horse Shoe. The site has also been demonstrated to be sustainable in terms of its proximity to existing services and facilities with public transport providing links to further facilities and services. It also provides opportunity to provide substantial amounts of open space. The site would therefore be well placed to ensure that future residents would have access to a diverse range of services and facilities.
- 2.6 The Illustrative Masterplan contained in Appendix 2 demonstrates how a sensitive landscape-led development, alongside multi-functional Green Infrastructure, could be brought forward as a natural extension to the north eastern edge of Gnosall.

Meeting Housing Needs

- 2.7 As set out earlier in these representations, Richborough consider that there is a compelling case to adopt a more ambitious housing need target, of 746dpa or higher, to deliver Local Plan that grasps the opportunity that the next Plan Period presents – supporting the exceptional potential for growth, reflecting the evidence of past trends and addressing affordability and affordable housing need. The site provides an opportunity to support a balanced spatial strategy that meets the local needs of Gnosall during the next Plan Period.

Providing Housing Quality, Mix and a Diversity of Homes

- 2.8 It is critical that the Council provides not only the quantum of housing to meet its needs; but the mix, type and quality of housing in the locations that will support the growth of the Borough. In this context, it is particularly crucial to provide the type and quality of housing in locations that will support the Borough's rural service centres and ensure that housing choice is provided for the next generation during the Plan Period.

Affordable Housing and Supporting Affordability

- 2.9 The EHDNA has identified significant affordability issues in the Borough (with demand exceeding supply) and a need for between 252 and 389 affordable homes per annum between 2020 to 2040. The site has the potential to support the delivery of affordable homes in a sustainable urban location, which will support the Council's supply of affordable housing during the Plan Period.

A Developable and Deliverable Site

- 2.10 As demonstrated in the following section, the site does not have any technical or environmental constraints that could not be mitigated, subject to further assessment work, which would prevent a sensitive residential development being brought forward at the site.

Summary

- 2.11 In summary, there is a strong case for the allocation of the site in the emerging Local Plan. The allocation of the site could support an appropriate spatial strategy that reflects the role of the Borough's larger settlements and deliver a sensitive development that meets the needs of Gnosall whilst respecting the scale and character of the village. The following section considers the specific technical and environmental considerations that will influence the development of the site.

3 TECHNICAL AND ENVIRONMENTAL CONSIDERATIONS

- 3.1 An Illustrative Masterplan has been prepared to reflect the design evolution of the site, underpinned by detailed technical analysis that has considered site opportunities and constraints. It has demonstrated that a development could be sensitively brought forward that responds to the site's characteristics and respects the character of the surrounding area.
- 3.2 This section sets out our understanding of the environmental and technical considerations, and serves as a framework for more detailed design and technical assessment work as the Local Plan is progressed towards Regulation 19 stage. An Illustrative Masterplan which interprets the key considerations is provided at **Appendix 2**.

Highways and Access

- 3.3 Transport Planners, HUB, has previously advised on the vehicular access options and highways capacity of the site, to demonstrate that the site is accessible, can be accessed safely and will be adequately accommodated into the local highways network.
- 3.4 Vehicular access is proposed to be taken from Horse Shoe, as shown on the Illustrative Masterplan, to the east of Glebe Lane, in the form of a staggered priority junction. There is an opportunity to widen the section of Horse Shoe between Glebe Lane and the proposed access to allow for ease of movement between the site access and Glebe Lane; which is seen as the primary access route to the site.
- 3.5 The immediate access road provided from Horse Shoe would be a 5.0m wide carriageway with 1.8m footways on both sides. Visibility would conform to Manual for Streets ("MfS"). There is a public right of way ("PROW") running southwest to northeast through the site from Horse Shoe and the Illustrative Masterplan has been developed to retain and utilise sustainable connections to this route.

Flood Risk & Drainage

- 3.6 The site is entirely located in Flood Zone 1 which has the lowest risk of flooding (defined as land as having less than 1 in 1000 years' annual probability of flooding).
- 3.7 Any surface water drainage from the development will be fully assessed and could be adequately managed via Sustainable Urban Drainage Systems ("SuDS"). In summary, it is not considered that, with suitable mitigation, there are any flood risk or drainage constraints preventing the site being brought forward for residential development.

Landscape

- 3.8 A Landscape and Visual Assessment has been previously carried out at the site by Pegasus, to determine the ability of the site (in landscape and visual terms) to accommodate development, and to assess the likely impact on landscape character and visual amenity should development come forward.
- 3.9 The assessment concludes that, overall, the scale and form of development is likely to result in only limited change at a localised level and, on balance, the potential landscape and visual effects are not likely to be significant. Furthermore, the proposals for green infrastructure and landscaping will deliver a number of enhancements in terms of the physical landscape and landscape character. As such, it is concluded that the proposed development is considered to be acceptable in landscape and visual terms.
- 3.10 Further detailed and updated landscape and visual assessment work can be undertaken, where required, as the Local Plan is progressed.

Heritage & Archaeology

- 3.11 The closest statutory heritage assets are more than 500m from the site, including the Gnosall Conservation Area and the Grade I listed St Lawrence Church. As such, it is not considered that there are any heritage constraints that would prevent the site being brought forward for development, subject to sensitive design that respects the character of the surrounding area.
- 3.12 An Archaeological Desk Based Assessment has previously been undertaken by Iain Soden Heritage Services, which found that there was no evidence that the site has ever contained any archaeological potential, noting that even casual finds in relation to its environs are absent, notably from the nearby modern housing developments.

Ground Conditions

- 3.13 The site is largely flat in terms of site levels and there are no topographical constraints to it being brought forward for development.
- 3.14 A Phase 1 assessment of ground conditions has previously been undertaken by MEC. It identifies a small number of potential risks to identified receptors, associated with the current site conditions and the previous agricultural site usage of the site. However, it is not anticipated that, subject to further intrusive assessment at the detailed design stage and suitable mitigation, that there are any significant constraints to development with respect to contamination or ground conditions.

Ecology and Trees

Ecology

- 3.15 Previous ecological appraisal work at the site (undertaken by Just Ecology) identified the potential for foraging and roosting bats, and nesting birds; but no evidence of Great Crested Newts or Badgers. It is not considered that there are any ecological constraints that would prevent the site from being redeveloped for housing; however, further ecological assessment and detailed survey work will be undertaken to support the allocation of the site and to accompany any future application.
- 3.16 It is considered that the parameters of development sought would be able to avoid adverse impacts in the first instance or being able to accommodate any necessary mitigation. It is considered that this can be achieved in areas of green infrastructure provision or integrated within built form itself (i.e. bird and bat boxes).
- 3.17 Doley Common Site of Special Scientific Interest (“SSSI”) is located approximately 1.2km to the west of the site and any impacts would be considered if detailed plans for the site are brought forward.
- 3.18 Also, owing to the agricultural nature of the site, there is a significant opportunity to deliver a net biodiversity gain. It is anticipated that the site will deliver BNG that meets at least current Government targets of 10%.

Trees

- 3.19 Trees are present primarily on the boundaries of the site an existing hedgerow which dissect the site. An assessment of the quality of the existing vegetation on the site will be undertaken as the Local Plan progresses, however, the Illustrative Masterplan provided at Appendix 2 demonstrates how a sensitive landscape-led scheme would be able to retain mature trees and valuable hedgerows as part of any development.

Utilities & Infrastructure

- 3.20 The site is adjacent to the settlement boundary and immediately adjacent to the existing Gnosall residential area – and, therefore, it is anticipated that appropriate services including electricity, water and broadband will be available.
- 3.21 As more detailed plans for the site are developed, and as the Local Plan is progressed, more detailed technical work will be undertaken to assess the utilities’ capacity of the proposed development. However, it is not anticipated that there are any significant utilities infrastructure constraints that would prevent the site from coming forward for development.

Public Rights of Way

- 3.22 A single Public Right of Way (“PROW”) crosses the site (Gnosall 24). The Illustrative Masterplan has been developed to ensure the existing PROW is retained and enhanced as part of the future development of the site. Dwellings will be oriented to provide natural surveillance to, and overlooking of the PROW.

Air Quality & Noise

- 3.23 The site is not within an Air Quality Management Area (“AQMA”) and there are not anticipated to be any air quality constraints that would prevent the site being brought forward for development. The site is also not within proximity to any significant noise receptors that could not be treated with mitigation.
- 3.24 Further noise and air quality assessment work will be undertaken as detailed plans for the site are developed; however, there are not considered to be any air quality or noise constraints that would prevent the development of the site for residential use.

Agricultural Land

- 3.25 An assessment of the agricultural quality of the land has previously been undertaken by Land Research Associates. The study identified that the soils to have clay loam topsoil that overlies clay loam and clay subsoil to form sub-grade 3a and sub-grade 3b land. A small area has sandy loam soils over loamy sand that forms grade 2 land. It concludes that the agricultural quality of the land at this site is likely to be below the average of that which encircles the village of Gnosall.

Sustainability & Energy

- 3.26 The emerging Local Plan and Preferred Options propose a strategic focus on mitigating the impact of climate change. The Local Plan vision seeks to *“Contribute to Stafford Borough being net zero carbon by ensuring that development mitigates and adapts to climate change and is future proof”*. Policy 4 of the Preferred Options seeks to promote a net zero operational target for residential development and requires new proposals to demonstrate that all resources are used efficiently, as part of the construction and operation of new buildings - with all major developments demonstrating how embodied emissions have been taken into consideration through the production of an embodied carbon assessment. In addition, the Council declared a Climate Emergency in July 2019, seeking to achieve carbon neutrality by 2040.
- 3.27 Richborough is committed to responding proactively and robustly in addressing and mitigating the adverse impacts of climate change and is fully supportive of the UK

Government's targets for reductions in greenhouse gas emissions. Richborough will seek to design a development that has holistic low energy, passive design concepts involving a fabric first approach and high emphasis on energy efficiency. The proposed development would seek to achieve a status of low carbon, carbon neutral and zero carbon ready by design status by obtaining energy from renewable sources and paying close attention to reducing its potential embodied carbon to the highest extent possible.

Summary

- 3.28 In summary, extensive technical work has previously been commissioned to understand the site constraints and opportunities. This has been used to inform the design evolution and underpin a deliverable masterplan for the site, which demonstrates how a landscape-led scheme for residential uses could be brought forward.
- 3.29 Richborough is committed to undertaking further design and technical work to support the promotion and consideration of the site as the emerging Local Plan is progressed.

4 DELIVERABILITY & BENEFITS

- 4.1 The Illustrative Masterplan at Appendix 2 demonstrates how land at Horse Shoe, Gnosall offers an opportunity to bring forward a deliverable site early in the Plan Period that will support circa 55 homes and deliver a range of economic, social and environmental benefits on a site that will support a balanced spatial strategy and underpin the vitality and vibrancy of Gnosall.
- 4.2 The site is in a highly accessible location that will support a sustainable pattern of development that delivers a spatial strategy that meets need, early in the Plan Period, across the Borough. This section provides a summary of the deliverability of the site and an assessment of the key benefits that allocating the site for development would bring to Gnosall.

A Deliverable Site

- 4.3 The NPPF seeks to ensure that deliverable sites are provided in appropriate locations to meet housing needs and support economic growth. To be considered deliverable, sites should be available, suitable and achievable and should be available to be brought forward within a realistic timeframe once the Local Plan is adopted.
- 4.4 Richborough is fully committed to the site and consider that it could be brought forward immediately on adoption of the Local Plan to meet the housing needs of the Borough. In summary the site is:
- **Available** – Richborough has entered into an agreement with the landowner to promote the site for residential development. Richborough has a proven track record of facilitating the delivery of high-quality housing developments on suitable and sustainable sites and can confirm that the site can be delivered for housing within the early phases of the Local Plan period. Richborough are strong advocates of a plan-led system and are committed to promoting land for residential development by engaging actively with local authorities, parish councils and other neighbourhood forums through local and neighbourhood plans.
 - **Suitable** - the site is entirely suitable for a residential development for the following reasons:
 - It offers a highly accessible and sustainable location for development that would support a balanced spatial strategy and which could be brought forward early in the Plan Period following any allocation.

- It is a logical and natural extension to Gnosall that is not within the Green Belt.
 - There are no environmental or technical constraints that are considered to prevent the development of the site, subject to suitable mitigation and a sensitive approach to design.
 - It can deliver satisfactory vehicular access and has access to the strategic highway network via the A518.
- **Achievable** – the Illustrative Masterplan demonstrates how the site responds to its physical characteristics, technical considerations and surrounding context by providing a sensitive landscape-led scheme. An assessment of the site constraints illustrates that delivery of the entire site is achievable, and a professional team of technical experts will support the detailed design of the site moving forward. Where any potential constraints have been identified, Richborough has considered the necessary mitigation measures and required investment in order to overcome any deliverability barriers. Richborough has reviewed the economic viability of the scheme in terms of the land value, attractiveness of the locality, level of potential market demand and projected rate of sales in Gnosall; as well as the cost factors associated with the site including site preparation costs and site constraints. In addition, Richborough has extensive experience working with nationally significant development partners. Developer partners who have built out Richborough sites include Bellway, Barratt David Wilson, CALA, Miller, Mulberry, Kier, Lion Court, Taylor Wimpey and Vistry. On Richborough’s sites, the average completion rate per sales outlet is a combined rate of 50 dpa for both market and affordable housing provision. Richborough confirms that the development of the site is economically viable, deliverable and achievable in accordance with the NPPF.

Key Benefits

- 4.5 The allocation of the site will support new housing in an appropriate location and ensure that a quantity, quality and mix is provided to support the economic growth of Stafford Borough. The delivery of the site will provide significant benefits to the Borough and to Gnosall. These are summarised as follows:

Economic Benefits

- 4.6 The development of the site will have significant economic benefits, both from its construction and occupation. Key economic benefits may include:

- Generating investment during the construction phase of development through construction cost, FTE construction jobs and an increase in GVA.
- Providing long term occupational / operational benefits including new resident expenditure, attracting new residents to SBC, generating flow on and supported jobs and, overall, generating increased economic output in the Borough.
- Generating significant revenue for the Local Authority, with a development of new homes generating revenue in Council Tax revenue, New Homes Bonus and through Section 106 contributions.
- Underpinning the catalytic growth opportunities in Stafford by providing the type, quality and spatial distribution of homes in Stafford that will allow the Borough to capitalise on its locational advantages and the arrival of HS2.

Social Benefits

4.7 The delivery of the site will have clear social benefits for existing and future residents, in terms of providing better choice, improving access to amenities and meeting a variety of identified housing needs. The key social benefits include:

- Delivering high quality market homes to meet the needs of the Borough's existing and future employees, supporting the future growth of the Borough.
- Providing viable and deliverable affordable homes to address the Borough's affordability crisis and support the housing of key workers and other first time buyers. The site will provide, at a minimum, a policy compliant level of affordable housing.
- Delivering new and accessible multifunctional open spaces, amenity spaces and green infrastructure to benefit existing and future residents.
- A new 'Audmore Community Green' that will provide a new multifunctional space for the local community.

Environmental Benefits

4.8 The development of the site has the potential to uplift the biodiversity, accessibility and overall enjoyment and environmental value of the site. In addition, the site has the potential to be an exemplar in sustainable design and construction. Key environmental benefits include:

- The site will create new habitats for a range of species and will seek to provide a biodiversity net gain on-site.

- The provision of multi-functional green infrastructure and open space that will generate significant recreational benefits for existing and prospective residents, including a new Audmore Community Green that will benefit the entire village.
- The protection and enhancement of existing features of the site that add value, including mature trees and hedgerows – including the retention of the existing hedgerow that dissects the site as a new ecological corridor.
- The promotion of and commitment to new cutting edge net zero technologies by Richborough.

SUMMARY

- 4.9 This response has been prepared by Richborough to provide detailed comments on the vision, spatial strategy and key policies of the Preferred Options; and to demonstrate the availability, suitability and deliverability of the site at Horse Shoe to provide a high quality residential development as part of a balanced spatial strategy for Stafford.
- 4.10 In summary, this response sets out that:
1. The Preferred Options proposed **Development Strategy** should be more ambitious and support a more balanced spatial strategy that:
 - a. Adopts a more ambitious housing need target, of 746dpa or higher, that supports the exceptional potential for growth in Stafford, reflects strong past trends in delivery and contributes to meeting the Borough affordable housing needs; and
 - b. Removes Meecebrook Garden Community as an allocation and stand-alone settlement at Tier 3 of the settlement hierarchy and takes a more balanced approach to apportioning an appropriate level of growth to the Borough's larger settlements, which have a higher capacity for growth and should accommodate additional growth to support a more balanced spatial distribution of housing.
 2. The approach to **Strategic and Site Allocations** should be reconsidered as the Preferred Options Plan progresses to Regulation 19, including:
 - a. Removing Meecebrook as a strategic site – which has been selected based on a pre-determined site selection process; and which is fundamentally unsustainable, inaccessible and undeliverable.
 - b. Considering a more balanced spatial strategy, by removing the Meecebrook strategic allocation, and delivering dispersed and sustainable growth across the Borough's larger settlements.
 - c. Allocating land for new homes in Gnosall as the third largest settlement in the Borough - ensuring that housing choice, vitality and affordability are not stifled in the village; which would fail to meet the needs of the next generation of residents.
 - d. The Council's site selection process for Gnosall is unclear and inconsistent. There is no justification for site GNO05 being omitted when considered against

other sites that were assessed in the Council's SA settlement scenarios, including the proposed allocation.

- e. Reassessing the proposed allocation (GNO04 west) against GNO05 (the Horse Shoe site), which is assessed more favourably in terms of its accessibility and ecology risk – and therefore more preferable for allocation.

Appendix 1 - Site Location Plan

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SITE LOCATION
13.77 ACRES/ 5.57 HECTARES

REVISION A: 13.10.2014
RED LINE BOUNDARY UPDATED IN ACCORDANCE
WITH DRWG BIR.4423_16A

LAND AT HORSESHOE, AUDMORE, GNOSALL
SITE LOCATION PLAN



Appendix 2 – Illustrative Masterplan

Appendix 3 – Review of New Passenger Station Proposals

Meecebrook

Review of new passenger station proposals

5th December 2022

Document history

Date	Version	Issued to	Status	Quantity	Format	Approved
01/12/2022	1	Client	Draft	1	PDF	NTG
02/12/2022	2	Client	Draft	1	PDF	NTG
05/12/2022	3	Client	FINAL	1	PDF	NTG

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1 Introduction

1.1 Scope of this report

- 1.1.1 Stafford Borough Council (SBC) is promoting a new Garden Community settlement at Meecebrook. SBC describe the site as lying approximately 6km west of the market town of Stone, in Staffordshire and near to the villages of Eccleshall, Swynnerton and Yarnfield. The M6 motorway runs east of the site, along with the HS2 line. The West Coast Main Line and Stafford to Manchester Railway Line, via Stoke-on-Trent, form part of the extensive railway network surrounding the site, with the closest station located in Stone.¹ The new Garden Community would include around 6,000 homes, employment space and community facilities. This will also include infrastructure needed to support the homes like GP and health provision, sustainable travel, and a new West Coast mainline railway station. Meecebrook Garden Community will be considered as part of the Council's Local Plan 2020-2040 process, with 3,000 new homes and necessary infrastructure to be delivered by 2040, and a further 3,000 new homes beyond 2040.²
- 1.1.2 Intermodality has been commissioned by a consortium of developers and land promoters, comprising Richborough Estates Ltd, Bloor Homes Ltd, Bellway Homes Ltd and Stoford Developments Ltd, to review the Council's proposals for the new station on the West Coast Main Line (WCML).

¹ Meecebrook Garden Community Leaflet, page 2

² <https://www.staffordbc.gov.uk/meecebrook-new-garden-settlement>

2 Development of new station proposals

2.1 Network Rail guidance

2.1.1 Network Rail (NR) is the licenced, regulated manager of the national rail network. Any new station proposal on the national rail network will require engagement with, and approval of, Network Rail. Network Rail's licence obligations require it to be confident that when schemes are completed, they can be operated and maintained safely, reliably, efficiently and cost effectively.³

2.1.2 In its guide to investment in new stations, Network Rail states (our highlighting):

The Investment in Stations Guidance is for use by any organisation which is interested in investing in station facilities. Such promoters would typically include **local authorities**, private developers, regional bodies and community rail partnerships. The guidance aims to ensure that such investment returns the maximum benefit to the investor and to passengers and other station users.

New Stations: A Guide for Promoters was originally published by the Strategic Rail Authority (SRA) in 2004. Following significant changes in the structure of the rail industry and the winding up of the SRA, Network Rail published a revised document Investment in Stations: A guide for promoters and developers in 2008. An update was published in 2011 to accompany the Network RUS: Stations published in the same year. This 2017 version retains the core guidance offered in the 2011 edition. Updates have been made to structure and content based on feedback from stakeholders:

- The document has been updated to take account of changes to legislation, policy and standards;
- **Greater emphasis is placed on the requirement that schemes be value for money, fit with industry plans, have an affordable whole life cost, and minimise disruption to the operational railway;**
- The document has been restructured to guide promoters clearly through key considerations for the initial development of a scheme.

The key considerations discussed are as follows:

- An option selection process should be carried out in order to establish that the option selected is the most effective means of achieving the promoter's objectives;
- **Engagement with both the local train operating company (TOC) or companies, the Station Facility Owner (SFO) and Network Rail is vital as they can advise the promoter as to the potential operational and financial viability of a proposal for station investment at an early stage;**
- **Enhancement of existing station facilities should generally be the first option considered for station investment as it is likely to minimise disruption and adverse operational impacts on the railway.** Consideration should be given to relocating an existing station or the opening of a new station where enhancement does not meet the scheme's objectives or there are additional benefits associated with these options. **However, station relocation or the addition of a new station to the network is likely to cause disruption and will only be possible where operational constraints allow;**

³ Investment in Stations, A guide for promoters and developers, Network Rail June 2017, page 17

- The timescale for construction of a new station is generally, on average, two years from start to finish. Significant time before this is required to develop and approve a proposal;
- Any proposed investment needs to demonstrate a positive impact for passengers and the existing railway network. For example, a new station needs to serve a new market and provide links to origins and destinations which would be desirable to potential passengers **without substantial disadvantages such as longer journey times for existing passengers**. This positive impact should be demonstrated in a WebTag compliant business case;
- Investment proposals must consider government objectives for the relevant route and the Long Term Planning Process (LTPP) which is the rail industry's plan to 2043. **Proposals which have impacts conflicting with industry strategy are unlikely to secure industry support**;
- Proposed investment should consider other recent and planned investments in stations and the rail network. A programme of planned investment may provide a good or even a one-off opportunity for coordinated third party investment in station facilities. Conversely, the relocation of a station which has recently seen substantial investment or **the opening of a new station on a section of line that has had journey time improvements is unlikely to offer benefit to the railway**;
- When station investment is partially or wholly funded by the Department for Transport (DfT) or Transport Scotland (TS) from a ring fenced fund, or is under a commercial framework to administer DfT or TS funding, the investment should be targeted to meet the conditions of that funding. These may include revenue return to the DfT or TS, generation of new revenue streams, passenger satisfaction improvement measurement through passenger survey Key Performance Indicators (KPIs) or other specific objectives.⁴

2.1.3 Network Rail then summarises the process for preparing a proposal for a new station:

- In order to show how the above objectives will be achieved by investing in a station the proposal will need to:
- Identify the nature of the local transport challenges being faced;
 - Determine the different transport options that could be adopted;
 - Understand the existing and future market for rail travel;
 - Demonstrate why a rail based enhancement is most appropriate as part of a package of enhancements or on its own;
 - Evaluate which of the potential options for rail investment is appropriate; consideration should be given to rolling stock and timetabling solutions which for some objectives may offer better value for money than investment in a station;
 - Consider the impact of the proposed option on the operation of the railway;
 - Consider how the proposed option fits with industry strategy and objectives.⁵

2.1.4 Throughout the document, Network Rail stresses the importance of early engagement with the rail industry on proposals for new stations, stating:

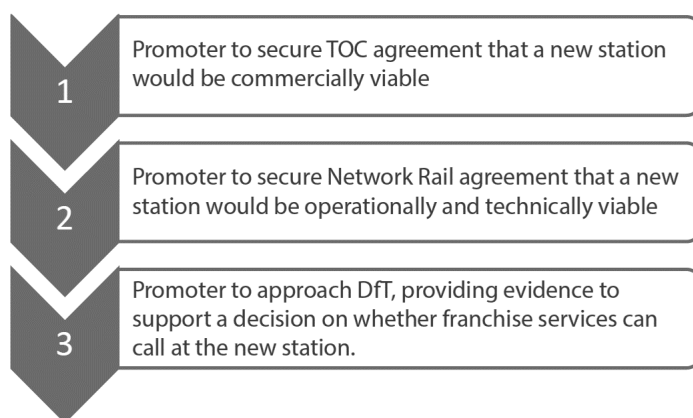
⁴ Pages 3-4

⁵ Page 5

A Train Operating Company (TOC) must support the provision of services to the new station and early engagement with TOCs is essential to any proposal.⁶

Without a positive business case a scheme will not be taken forward for consideration by railway industry stakeholders. The railway industry encourages promoters to have early discussions with the contacts identified in chapter 8 to establish the likely viability of proposals and for guidance in preparing a business case. It is vital that rail industry bodies are consulted as early as possible in the development of a proposal for investment in a station. Network Rail and the relevant TOC(s) will be able to gauge the potential viability of a scheme from the outset. They can also provide specific local advice and guidance on operational considerations which must be taken into account in order to develop a successful proposal, and information on any enhancements or changes to service patterns already planned at the station. The diagram below sets out the early steps promoters should take in developing a proposal for a new station.⁷

Figure 1 Early steps for promoters of new stations (source Network Rail)



Operational and performance issues need to be considered at the inception stage of the project and early engagement with Network Rail and TOCs is recommended to establish scheme feasibility. It is important that a proposal for a new station is developed with cognisance of the current and planned service pattern on the route and of existing infrastructure constraints. Engagement with Network Rail is advisable in these cases as they may be able to provide an early view of forthcoming Route Study recommendations.

Having established whether there is a fit with the industry planning framework, a promoter will also need to form an early view as to the appropriate service pattern at the new station. This would include the practicality of stopping all or just some of the existing services at the new station, or of introducing new services to serve the facility. The views of the relevant franchising authority should be sought.⁸

⁶ Page 6

⁷ Page 7

⁸ Page 13

Early engagement with the rail industry is indispensable to ensure that proposals for station enhancements or new stations can be developed successfully. Network Rail's route-based Strategic Planning teams act as the first point of contact for promoters. Where Network Rail is involved in the proposed enhancement, Network Rail's Strategic Planning teams will work with developers and local authorities on the scheme throughout the feasibility processes and planning stages.⁹

As the day to day operators of stations, TOCs have invaluable knowledge about the needs of their customers and the issues that need to be addressed. They are a key party to any changes that are proposed and should be involved in any proposal from an early stage.¹⁰

Early dialogue with industry parties is essential as they can assist promoters in working through these requirements and in some cases take the lead to ensure that certain requirements are met.¹¹

- 2.1.5 In addition to Network Rail, the Department for Transport (DfT) will in turn expect to receive an initial Strategic Outline Business Case (SOBC) for the new station, as with other station projects being developed or promoted in recent years (see Table below). This also highlights the range of lead times involved in delivering new stations:

Table 1 Examples of recent station SOBC

Site	First proposed	SOBC	BCR	Opening date
Old Oak (London) ¹²	2010	2017	3.5	2030
Magor and Undy (South Wales) ¹³	2013	2018	1.7	None at present
Worcestershire Parkway ¹⁴	2006	2014	3.3 – 3.6	2020
Cambridge South ¹⁵	2017	2021	1.9	2025
Darlaston and Willenhall stations (West Midlands) ¹⁶	2017	2021	4.7 – 6.5	2023

⁹ Page 17

¹⁰ Page 20

¹¹ Page 21

https://www.whatdotheyknow.com/request/599394/response/1427134/attach/3/FINAL%20Old%20Oak%20Overground%20Stations%20Consolidated%20SOBC%202017%20Full%20Document.pdf?cookie_passthrough=1

¹³ <http://magorstation.co.uk/wp-content/uploads/2020/06/Magor-and-Undy-Station-SOBC-revB.pdf>

¹⁴ <http://e-planning.worcestershire.gov.uk/swift/apas/run/WCHDISPLAYMEDIA.showImage?theSeqNo=15526&theApnkey=848&theModule=1>

¹⁵ <https://sacuksprodnrdigital0001.blob.core.windows.net/twao-cambridge-south-infrastructure-enhancements/Cambridge%20South%20station%20OBC/Cambridge%20South%20Outline%20Business%20Case.pdf>

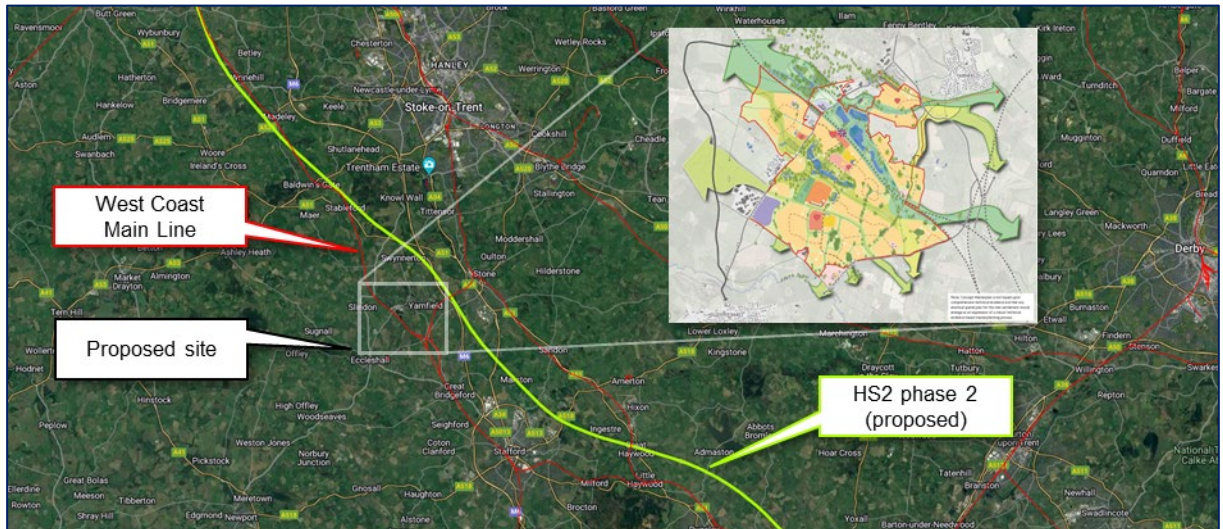
¹⁶ <https://governance.wmca.org.uk/documents/s5126/Report.pdf>

3 The proposed site

3.1 Location

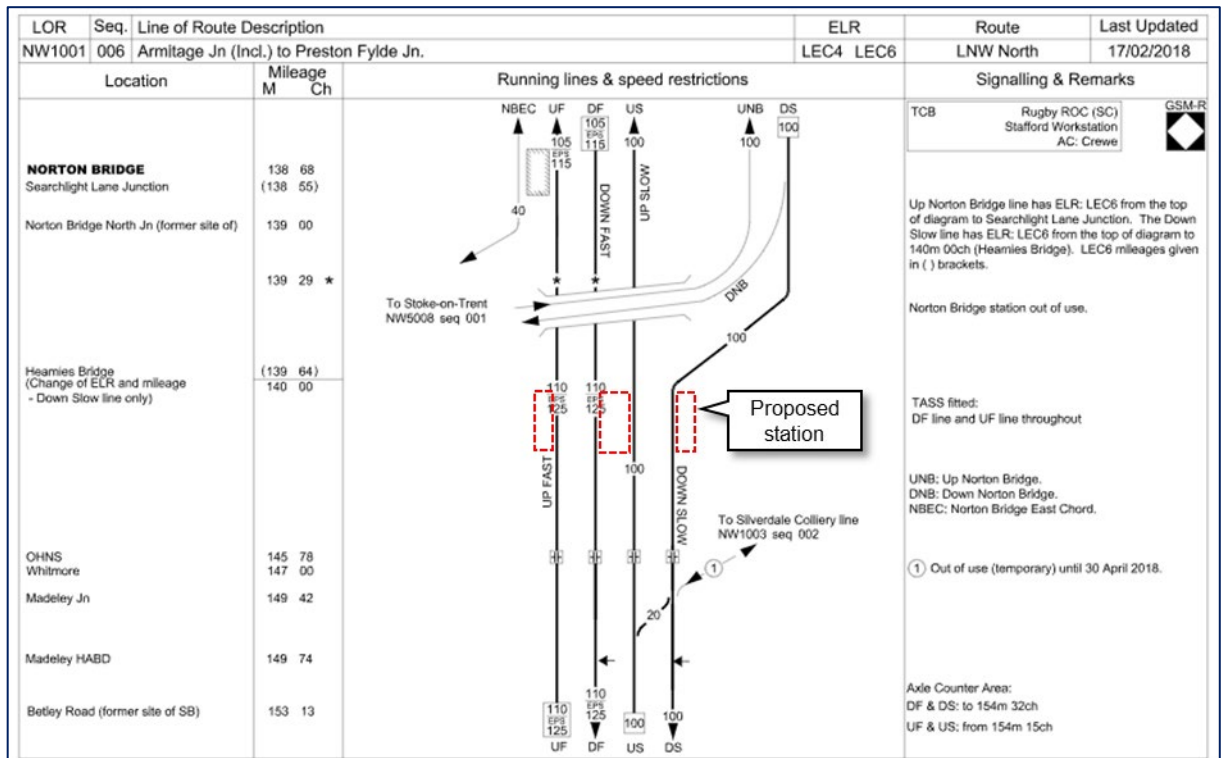
3.1.1 The location of the site relative to the West Coast Main Line (WCML) is shown in the Figure below:

Figure 2 Location plan



3.1.2 The site is located immediately to the north of Norton Bridge Junction, a major grade-separated intersection of the WCML between the routes to Crewe, Stafford and Stoke-on-Trent respectively:

Figure 3 Site location (source Network Rail Sectional Appendix, north to bottom of picture)



- 3.1.3 The proposed location is a four-track main line, with trains passing the site at speeds of up to 100-125mph. It is also worth noting that the track layout has two running lines for “fast” services at 110-125mph linespeed on the eastern side of the formation (left on the above Figure) and two running lines for “slow” services on the western side of the formation (right on the above Figure). The feasibility studies undertaken for SBC (see next section) assume that new platforms would be needed to enable trains to call at the station on the fast lines when the slow lines are closed for engineering and vice versa. This would require major works to (and disruption of) the entire WCML, to separate the fast and slow lines to allow the insertion of a new island platform and outer platforms, as indicated in the Figure above.

3.2 West Coast Main Line current traffic levels

- 3.2.1 The WCML falls within Network Rail’s North West & Central (NW&C) route, described as follows:

NW&C is the ‘Backbone of Britain’ – the economic spine linking our main cities. We connect workers with jobs, people with loved ones and goods to market.

Our infrastructure runs from London Euston and Marylebone in the south through the Chiltern and West Midlands regions, the North West of England and Cumbria before joining with Scotland at Gretna. We are home to the West Coast Main Line, the busiest mixed-use railway in Europe, serving London, Birmingham, Manchester, Liverpool, Edinburgh and Glasgow.

In the five years to 2024, passenger demand is set to grow by 12% and freight by 18%. Major railway upgrade schemes to cater for this growth include HS2, East West Rail, Midlands Rail Hub and the Great North Rail Project.

- 246.5 million annual rail passenger journeys;
- 1.3 million passengers travel through this region each weekday;
- 6,724 passenger and freight services per day;
- 700,000 tonnes of freight is moved each week.¹⁷

- 3.2.2 With regard to the section of the WCML south of Crewe, Network Rail further notes:

The West Coast South route stretches from the south of Crewe to London Euston. It carries millions of passengers and up to 10% of freight traffic a year.

It’s also the busiest mixed-use railway in Europe, forming Anglo-Scottish journeys between London, Glasgow and Edinburgh via the West Midlands and North West, as well as providing commuter links direct to the capital through Hertfordshire, Northamptonshire and Buckinghamshire.

This piece of track is the main route for electrified freight trains which helps to remove lorries from the roads and will contribute to the UK’s ambition to reach net zero carbon emissions by 2050.¹⁸

¹⁷ <https://www.networkrail.co.uk/running-the-railway/our-regions/north-west-and-central/>

¹⁸ <https://www.networkrail.co.uk/running-the-railway/our-routes/west-coast-mainline-south/>

- 3.2.3 The latest (December 2022) working timetable (WTT) shows over 500 trains passing the site every 24 hours, split almost 50:50 between passenger and freight, with a train passing the site of the new residential community every 3 minutes throughout the day and night, including 2,400 tonne aggregate trains, 775m long intermodal trains and 125mph high-speed passenger trains.¹⁹ This level of intensity and variety of rail traffic creates major challenges for developing any new station on this section of the WCML, not least the knock-on effects to existing passenger and freight services of introducing an additional station stop within the timetable.
- 3.2.4 Even with the proposed construction of phase 2 of HS2 (see below), the WCML is already expected to see additional growth in traffic for passenger and freight, the latter boosted by new developments such as the West Midlands Interchange project under construction to the south of Meecebrook, at Four Ashes in Staffordshire, which will have capacity to generate up to 10 new freight trains per day onto the WCML.²⁰

3.3 West Coast Main Line journey time improvements

- 3.3.1 The WCML has been the subject of a series of major route upgrades to improve capacity and capability over the last 20 years. The first phase of the upgrade, south of Manchester, opened in 2004 delivering journey time improvements of 1 hour 21 minutes for London to Birmingham and 2 hours 6 minutes for London to Manchester. A second phase, introducing 125 mph running along most of the line, opened in December 2005, bringing the fastest journey between London and Glasgow from 5 hours 10 minutes to 4 hours 25 mins. Substantial further works were undertaken, including quadrupling of the track in the Trent Valley, upgrading the slow lines, remodelling track and signalling through Nuneaton, Stafford, Rugby, Milton Keynes and Coventry stations, which was completed in late 2008. A £250 million project to grade-separate the tracks at Norton Bridge, which allowed for increased service frequency as well as improved line-speeds, was completed in 2016.
- 3.3.2 We are not aware of the Meecebrook station proposals ever being considered within any of these route upgrades, Network Rail noting in its new station guidance (see previous section) that “the opening of a new station on a section of line that has had journey time improvements is unlikely to offer benefit to the railway.”

3.4 West Coast Main Line route strategy

- 3.4.1 Network Rail’s specification of, and plans for, the WCML are set out in its 2021 Route Specification document.²¹ Network Rail makes no reference to proposals for a new station at Meecebrook.

3.5 HS2

- 3.5.1 Phase 2a would extend the new high speed railway line north west to the proposed Crewe Hub station from the northern extremity of Phase 1 (London to West Midlands) north of Lichfield. Phase 2a was approved by the House of Commons in July 2019, and received Royal Assent on 11 February 2021. Construction of phase 2a will be in parallel with Phase 1, HS2 suggesting that services will begin operating between London, Birmingham and Crewe between 2029 and 2033.²²

¹⁹ Source Network Rail (realtimetrains.co.uk website)

²⁰ <https://news.railbusinessdaily.com/west-midlands-interchange-is-set-to-boost-local-jobs-and-the-economy/>

²¹ Delivering a better railway for a better Britain Route Specifications 2021 North West and Central (NW&C) region, Network Rail

²² <https://www.hs2.org.uk/the-route/west-midlands-to-crewe/>

4 Meecebrook station feasibility studies

4.1 Reports produced to date

4.1.1 Reports produced to date include:

- Meecebrook Garden Community Transport Strategy, July 2020 (Atkins);
- Pre-Feasibility Report V0.1, March 2022 (SLC Rail);
- Feasibility Report v1.0, July 2022, updating work in the March 2022 report (SLC Rail).

4.2 July 2020 Atkins report

4.2.1 Notably, the Atkins report assumed a much higher level of development (around 10,000 homes²³) than currently proposed.

4.2.2 The main findings of the 2020 report related to the station included:

- Overall, it was found that the additional trips on the external highway network as a result of trips from Meecebrook Garden Community would still have a major impact even with the new railway station, and therefore potential mitigation solutions would need to be considered, including
 - Highway mitigation measures along existing corridors or junctions to improve the existing highway capacity;
 - An additional motorway junction to provide additional access to the SRN; or
 - The promotion of alternative sustainable modes of transport to reduce car dependency;²⁴
- It is understood that Staffordshire County Council (SCC) are engaging with Network Rail regarding the potential to deliver a new railway station on the West Coast Mainline;²⁵
- Stafford Borough has good rail connectivity and is served by the West Coast Main Line with existing railway stations located at Stone, Stafford and Stoke-on-Trent. It is important to note that the proposed alignment of HS2 runs to the north of the site. It is proposed that Stoke will become an 'integrated high-speed station' where passengers can travel on classic-compatible HS2 trains and access the high-speed network to the South.²⁶

²³ Page 4 section 1.1

²⁴ Page 7, 24

²⁵ Page 8

²⁶ Page 8

4.3 July 2022 SLC report

Demand modelling

- 4.3.1 SLC draws on an appended analysis by SYSTRA to conclude that once Meecebrook is fully built there is a prospect of station revenue generating a medium level of value for money (BCR 1.5). To set this in context, the Department for Transport's "WebTAG" categorisation of projects defines "medium" value for money as a BCR of between 1.5 and 2.0, so the case for the new station would be at the lower end of this range.
- 4.3.2 It is also important to note here the assumption in the demand forecasting that the new station would be open by 2026 (an optimistic assumption, given the time stations can take to plan, secure approval / funding and construct, see Table 1), but to achieve a viable position the entire 6,000 homes would need to have been delivered.
- 4.3.3 This is an important point to note, as SBC suggest an initial phase of 3,000 new homes and necessary infrastructure to be delivered by 2040, and a further 3,000 new homes beyond 2040, the implication being (assuming the Council's lead-in times and delivery rates of 300 dwellings per annum) that 6,000 homes could take until beyond 2050 to deliver. In the interim, SYSTRA has previously noted, in a separate analysis of another proposed settlement and station in Bedfordshire on behalf of the local planning authority, that:

The development, in isolation of any other new settlement development options, will allocate 4,500 dwellings, **below the 5,000 dwellings considered the indicative benchmark for considering the construction of a new railway station.**²⁷

- 4.3.4 It is also worth noting that SYSTRA forecast that a new station would abstract customers from existing stations of 4,423 per annum in 2026 (assumed first year of opening, 4 years before the delivery of any houses on site) to 9,936 in 2040 (end of Local Plan Period).²⁸ SYSTRA further note in this regard:

The number of passengers lost from existing services [14,000 in 2026 to 31,000 in 2040] is fairly significant compared to station trip generation in 2026. However, by 2040, after full development build out this is far less significant.²⁹

- 4.3.5 This level of abstraction from existing stations and services (which would be assumed to increase further beyond 2040) would be one of the key considerations by TOCs, Network Rail and DfT in determining the acceptability of the new station proposals. In the short term, the implication is that the new station, in a remote location devoid of any development, would then abstract passengers from existing stations, diverting highway trips into the local area.
- 4.3.6 SYSTRA conclude the analysis that:

Our analysis has shown that that station is predicted to generate medium value for money. However, this is entirely dependent on the delivery of development surrounding the station.³⁰

- 4.3.7 SYSTRA then reiterate later in the document that:

²⁷ Sharnbrook Railway Station Initial Transport Feasibility, SYSTRA for Bedford Council

²⁸ Page 13 of SYSTRA report

²⁹ Page 14 of SYSTRA report

³⁰ Page 9 of SYSTRA report

Delivering a station at Meecebrook is predicted to deliver Medium value for money. However, this is heavily dependent on the delivery of the adjacent Garden Village development.³¹

Train Service Planning

- 4.3.8 SLC conclude that there is a reasonable prospect of achieving a train frequency of two trains per hour at the station, albeit noting that HS2 introduces a level of complexity in developing a future train plan specification.
- 4.3.9 These conclusions draw on supporting appended work by Rail Aspects, which sets out the context in terms of current traffic levels and utilisation of the WCML, stating:

The Stafford-Crewe section of the WCML is intensively utilised, although the segregation of Fast Lines and Slow Lines combined with the recent grade-separation of the junction at Norton Bridge provide some flexibility with the principal constraints being either side of Crewe, where the four-track alignment narrows to a three-or two-track alignment.

South of Stafford, the Trent Valley is a 2-track railway between Milford Jn. and Colwich Jn., then reverts to 4-track except for a short distance south of Nuneaton.

The route between Stafford and Wolverhampton is, by the current standards of the railway network, relatively lightly utilised with only six trains passing in each direction in most hours. Further to the south, this route becomes increasingly congested through Wolverhampton and at Birmingham New Street and the service is sufficiently intensive throughout the day that it is very difficult to find flexibility in train paths.

Onwards towards Liverpool, the route is fairly congested with a mixture of high-speed, regional and local services, although with some flexibility around individual train paths.

In summary, retiming of services to accommodate a station call at Meecebrook would probably need to take place away from Birmingham New Street and the WCML South, and also minimise any impact on high-profile, high-speed services on the WCML.³²

- 4.3.10 An important point to note from the Rail Aspect report is the need for new platforms serving both the fast and slow lines on the WCML, the report stating:

Provision of station calls at Meecebrook is highly likely to require provision of a 4-platform station, i.e. platforms on the Fast Lines and on the Slow Lines. Although it would probably be possible to arrange for the majority of weekday stopping services to be timetabled on the Slow Lines, this would not be possible on Sundays owing to engineering access restrictions. It is also considered likely that services planned via the Slow Lines will be regularly run via the Fast Lines during periods of disrupted running, as a service recovery measure.³³

- 4.3.11 The Rail Aspect report notes potential issues with the signalling and operation of services through any new station:

³¹ Page 19 of SYSTRA report

³² Page 6 of Rail Aspect Report

³³ Page 2 of Rail Aspect Report

Local signalling is designed for high speed non-stop services, with block lengths of 1100m to 1400m (Figure 2) and the planning headway in the immediate vicinity is 3 minutes between following train services (up to a maximum of 13 trains per hour on the Fast Lines).

Consequently, it should be assumed that the current signalling would not be ideally suited to stopping of services within the signal blocks.

However, given the relatively anticipated level of service, together with the flexibility offered by the 4-track configuration, any alterations to existing signalling are considered likely to be necessary only if it is required to run consecutive stopping services at close headways or if the location of existing signals conflicts with other engineering considerations such as the location of station platforms.

4.3.12 In terms the performance impact on other services, the Rail Aspect report states (our highlighting):

Introduction of the station calls within the existing service would likely have some performance implications, particularly in the form of risk of knock-on delays to other train services, **as the route is congested, especially towards Liverpool, and towards Wolverhampton and Birmingham**. These risks have not been quantified but are considered unlikely to be severe enough to prevent further development of the scheme at this stage.³⁴

It is inevitable, when inserting additional station calls in existing services, that some level of performance risk is incurred. It is noted that the WMT London Northwestern service groups have recently performed below Operator target performance levels, and any proposals to modify the service are likely to have some degree of sensitivity around potential performance impacts.

In this case, the specific risks would be increases in “1st Order” reactionary delays along the Stafford-Crewe corridor and potentially on towards Rugby, Birmingham and Crewe, i.e. faster trains being delayed by the stopping services. “2nd Order” reactionary delays, i.e. outbound services delayed by late arrival of the inbound service might also be a risk, in particular at Liverpool (see Section 8.3) and Birmingham New Street where some splitting and joining of services takes place.

Avanti West Coast have stated an objective of running a second hourly Euston-Liverpool path. Details of this service are not yet available; there is some risk that this would further complicate adjustments to the timetable.

Aside from performance risks, there may be complexities in the detail of retiming of services either locally (for example, diverting from the Fast to the Slow line) or more widely (for example, rigid timetable structures in the Liverpool area) that are not apparent from this initial overview.³⁵

4.3.13 The situation post-HS2 is also referenced by Rail Aspect, which notes (our highlighting):

Once Phase 2a is open between Birmingham and Crewe, high speed services are expected to operate from London Euston via HS2 and Crewe Hub, to Glasgow, Edinburgh, Manchester, Liverpool and North Wales using classic-compatible high speed rolling stock.

³⁴ Page 2 of Rail Aspect Report

³⁵ Pages 11 and 12 of Rail Aspect Report

In theory, this will remove most long-distance high-speed traffic from the WCML south of Crewe; **however, it appears likely that at least some paths will be retained to maintain connectivity with intermediate stations** such as Milton Keynes, Rugby, Coventry, Wolverhampton, the Trent Valley stations and Stafford. As end-to-end journey times will become less sensitive, it is also possible that these paths will be regularised, e.g. adding additional calls at Milton Keynes or Stafford, for example.

This would offer improved journey times from these locations whilst also reducing constraints on capacity on the Stafford-Crewe section, either by reducing the number of required paths or by increasing the flexibility of remaining paths (possibly also opening up the potential to introduce calls at Meecebrook in residual train services).

However, constraints on other routes (Crewe to/from Liverpool in particular, and between Wolverhampton and Birmingham to some extent) would probably remain in place post-HS2.

4.3.14 In terms of industry engagement, Rail Aspect confirm that no industry engagement was undertaken at the time of writing, noting that Train Operating Companies (TOCs), Freight Operating Companies (FOCs) and Network Rail will need to be engaged at the earliest opportunity.³⁶

4.3.15 Rail Aspect concludes that:

Based on the analysis that has been conducted, and assuming a timetable baseline equivalent to the December 2019 (pre-COVID) service specification, station calls at Meecebrook could be accommodated in at least one of the two existing twice-hourly West Midlands Trains services between Liverpool Lime Street and Birmingham New Street/London Euston, by means of timing adjustments to these services and without undue consequences.

Insertion of calls in other passing services (predominantly Avanti West Coast high speed services) is likely to prove more problematic and has not been investigated in depth at this stage.³⁷

4.4 Station location, value-for-money and Strategic Case

4.4.1 SLC conclude in the Executive Summary that:

- A potentially viable location has been identified;
- A good prospect of obtaining an acceptable BCR;
- A proposed methodology to make the strategic case is defined, although the summary table indicates that work on the strategic case was yet to be completed.

4.4.2 SLC appear to have undertaken a considerable amount of work, covering technical disciplines and topics typically associated with, involving or led by Network Rail, but without any evidence of Network Rail (or wider industry) involvement in developing, reviewing or validating this work.

4.4.3 Of the options considered, SLC indicate the North Option to be preferable, within the context of the main risk and cost drivers identified as follows:

³⁶ Page 12 of Rail Aspect Report

³⁷ Page 1 of Rail Aspect Report

The main risk and cost drivers for this option are associated with the signalling modifications required to accommodate the station, as the existing signals are too far away (and obstructed by structures) to be visible from the platform ends. Early engagement with Network Rail's Signalling Project Engineer (PE) and Route Asset Manager (RAM) is therefore critical to the success of this option.

In addition, the Network Rail RRAP [Road-Rail maintenance vehicle Access Point] will need to be relocated to accommodate the new platform, however as the existing RRAP and access route is located fully within the boundaries of the current development masterplan, it is assumed that this relocation will be feasible and some change to the RRAP will be required as part of the development masterplan, regardless of the station project going ahead.³⁸

- 4.4.4 In terms of costs, SLC suggest the base cost for the North Option to be £34.1m, plus risk allowance of 60%, totalling £54.6m, SLC noting these exclude the significant recent increase in construction costs.³⁹ This differs from the assumption used in the SYSTRA report of £39.99m plus Optimism Bias, market price conversion and inflation totalling £102.6m, almost twice that assumed by SLC.⁴⁰
- 4.4.5 The reports do not explain how the difference between station / farebox income and the significant upfront investment costs, or annual operating costs (£200,000 excluding Optimism Bias of up to 41%⁴¹) would be covered in the period between 2026 and the mid-2050s when the development achieves the critical mass needed to deliver a viable business case.

4.5 Rail industry engagement

- 4.5.1 As with the Network Rail guidance set out in Section 2 earlier, the SLC report makes repeated references for the need to engage with the wider rail industry, but there is no evidence that the local authorities have engaged with Network Rail, TOCs, FOCs, the Rail Delivery Group, the Rail Freight Group, or the Department for Transport.
- 4.5.2 This lack of engagement is highlighted by a recent (October 2022) Freedom of Information request made to Network Rail asking for confirmation of whether a new station had been agreed with SBC and what stage the proposals had reached.⁴² Network Rail responded (see Appendix) stating that (our highlighting):

1) Please confirm if a new West Coast Mainline station has been agreed.

We have not made any agreements relating to a new station at Meecebrook. As mentioned above, our planners are carrying out work to assess the long-term impact of some new station proposals on the West Coast South route, but this work is not looking at developing the case for, or the deliverability of, a new station at Meecebrook in the short-to-medium term.

2) If it has not been agreed, what stage are proposals at?

There are currently no Network Rail proposals for a station at Meecebrook and our planners have advised that they have not been consulted with directly by Stafford Borough Council or Staffordshire County Council on this subject.

³⁸ Page 31 of the Feasibility Report

³⁹ Page 18 of Feasibility report

⁴⁰ Page 16 of SYSTRA report

⁴¹ Page 17 of SYSTRA report

⁴² https://www.whatdotheyknow.com/request/meecebrook_claims_regarding_new

3) What would be the approximate total cost of a new station?

We are unable to advise on this point, as Network Rail has not assessed this.

4) Who would pay for this?

Again, we are unable to advise as we do not have any specific proposals for Meecebrook.

5) Does a new development on greenfield (instead of brownfield) fit with the Network Rail environmental strategy?

As we have not been involved in any proposals, this is not something Network Rail has looked at.

5 Conclusions

5.1 The case for a new station at Meecebrook

5.1.1 The pre-feasibility and feasibility studies, and our assessment of the technical work, highlight several key issues and areas of risk in developing a brand new, multi-platform station on the WCML, including:

- The intensity of current rail services on the WCML, the 'Backbone of Britain', the busiest mixed-use railway in Europe with a nationally-significant role for moving passengers and freight;
- A series of major upgrades to the WCML have been undertaken in recent years to improve capability and reduce journey times, including a major grade-separated junction at Norton Bridge, but without any provision being made in the previous or current strategy for any new station at Meecebrook;
- Engineering access on the WCML, which shuts either the fast or slow lines passing the site, would necessitate a 4-platform station to be constructed for network operational reasons, but which would not otherwise be justified commercially, adding substantially to the complexity, cost and risk of delivering the station, relative to the size of the adjacent development which would need to fund and sustain it;
- Current signalling not being suitable in capacity or location to accommodate a new station, and as such adding to the complexity, cost and risk of delivering the project, in terms of new and altered signalling;
- A new station would abstract demand and revenue from existing stations;
- The need for the entire development to be completed (which might not occur for another 30 years) in order to generate sufficient critical mass of demand, with no indication in the reports on how / who would cover the financial losses in the intervening period;
- The ability to fund and deliver rail enhancements in the current climate, SLC noting recently that:

Covid-19 and its multiple impacts on ways and places of work, demand for rail travel, government funding of railway services and future enhancements, and some resultant semi-permanent service reductions, including a number affecting Worcestershire.

The collapse of rail passenger demand during the COVID lockdown from March 23rd 2020 not only required substantial funding support from government for the maintenance of services but challenged industry thinking and evidencing of future network development given its impact upon ways of working, locations of work, commuting and leisure travel, and hence of the nature of train services and connectivity that may be required in a post-COVID future.⁴³

- The conclusion from Atkins that, even if the station were to be delivered, the development would still generate considerable levels of highway trips, requiring further mitigation measures;⁴⁴
- The conclusion of SLC that the station business case would achieve a BCR of 1.5, at the low end of the range for "medium" value for money.

⁴³ Worcestershire Draft Rail Investment Strategy 2 2022 to 2050, SLC Rail for Worcestershire County Council, July 2022, pages 3 and 9

⁴⁴ Atkins report page 7, 24

- 5.1.2 Even setting aside these challenges, the fundamental concern with the conception of the proposals for a new station at Meecebrook is the apparent complete lack of early (or any) engagement with the rail industry, especially with Network Rail as the licenced, regulated manager of the national rail network. Network Rail's licence obligations require it to be confident that when schemes are completed, they can be operated and maintained safely, reliably, efficiently and cost effectively. Network Rail's guidance clearly and repeatedly states the need for, and benefits of, early engagement with industry, including TOCs, FOCs, DfT and other industry stakeholders
- 5.1.3 The WCML is one of the busiest routes in Britain, therefore demonstrating a compelling business case, in operational or commercial terms, will be particularly challenging. The post-COVID environment, with the substantial structural reductions in travel, farebox income and investment, means the value-for-money threshold for new stations across the network will now be set even higher, as promoters chase reduced public funding.
- 5.1.4 This creates a major concern with the viability of the proposed new station, given that the level of development needed to achieve (at best) a medium level of value-for-money would not be in place before the mid-2050's at the earliest, but with a scheme that assumes a station would be fully operational (with all investment and operating costs then covered) within the next 4 years. It is a major concern that the work to date does not explain how the significant upfront investment costs (£54-103m, which as SLC note does not factor in the significant recent increases in construction costs) or operating costs (£200,000 per annum excluding Optimism Bias of up to 41%) would be covered in the period between 2026 and the mid-2050s.
- 5.1.5 Having progressed early-stage multi-disciplinary feasibility work in the post-COVID rail sector, for a multi-platform station serving and affecting all four fast and slow lines of the 100-125mph WCML, with associated performance and capacity risks to over 500 existing passenger and freight services per day, without any early-stage engagement with Network Rail or wider industry stakeholders, clearly conflicts with the industry guidance (and the conclusions of the reports commissioned by SBC to date). The suggested merits and deliverability of the proposed new station therefore carry little or no weight in the absence of a review and validation by Network Rail and the wider rail industry stakeholders.
- 5.1.6 Based on our experience with the planning and implementation of major rail-related developments, we would have expected to see evidence of the station proposals being worked up to at least Engineering Stage 2 of Network Rail's governance for assessing new projects (Project Acceleration in a Controlled Environment or PACE), backed by a Basic Services Agreement (BSA) between SBC and Network Rail, within which a multi-disciplinary feasibility study would be undertaken jointly by the parties, with Network Rail providing a Commercial Scheme Sponsor to manage the process.
- 5.1.7 A critical initial component in this work would be a capability study, to determine to the satisfaction of Network Rail (and/or the TOCs/FOCs) the ability to path existing passenger services through any new station without importing unacceptable performance risk, as determined by Network Rail through its quality assurance process.
- 5.1.8 In the absence of such engagement, with reference to Network Rail's published guidance for new stations, the following limited conclusions can be drawn:

Table 2 Alignment of Meecebrook station proposals against NR guidance

Guidance	Current status
Greater emphasis is placed on the requirement that schemes be value for money, fit with industry plans, have an affordable whole life cost, and minimise disruption to the operational railway	A good prospect of obtaining an acceptable BCR provided entire development is built Construction and operation would bring disruption to all four WCML running lines
Option selection process to be undertaken	Limited assessment without industry engagement
Engagement with both the local train operating company (TOC) or companies, the Station Facility Owner (SFO) and Network Rail is vital as they can advise the promoter as to the potential operational and financial viability of a proposal for station investment at an early stage;	None to date as confirmed in writing by Network Rail
Enhancement of existing station facilities should generally be the first option considered for station investment as it is likely to minimise disruption and adverse operational impacts on the railway.	Not considered
Consideration should be given to relocating an existing station or the opening of a new station where enhancement does not meet the scheme's objectives or there are additional benefits associated with these options. However, station relocation or the addition of a new station to the network is likely to cause disruption and will only be possible where operational constraints allow	Relocation not considered Proposed addition of a new station Construction and operation would bring disruption to all four WCML running lines
The timescale for construction of a new station is generally, on average, two years from start to finish. Significant time before this is required to develop and approve a proposal	Reports produced in 2022 assume opening in 2026
Any proposed investment needs to demonstrate a positive impact for passengers and the existing railway network. For example, a new station needs to serve a new market and provide links to origins and destinations which would be desirable to potential passengers without substantial disadvantages such as longer journey times for existing passengers. This positive impact should be demonstrated in a WebTag compliant business case;	Limited assessment without industry engagement
Investment proposals must consider government objectives for the relevant route and the Long Term Planning Process (LTPP) which is the rail industry's plan to 2043. Proposals which have impacts conflicting with industry strategy are unlikely to secure industry support	Not referenced in Network Rail's Route Specification No evidence provided on LTPP alignment or other industry strategies
Proposed investment should consider other recent and planned investments in stations and the rail network. A programme of planned investment may provide a good or even a one-off opportunity for coordinated third party investment in station facilities. Conversely, the relocation of a station which has recently seen substantial investment or the opening of a new station on a section of line that has had journey time improvements is unlikely to offer benefit to the railway;	No evidence provided of wider synergies beyond HS2 The new station would be on a section of the WCML which has had substantial journey time improvements in recent years, but without any cognisance or provision for a new station
When station investment is partially or wholly funded by DfT from a ring fenced fund, or is under a commercial framework to administer DfT funding, the investment should be targeted to meet the conditions of that funding. These may include revenue return to the DfT, generation of new revenue streams, passenger satisfaction improvement measurement	Limited assessment without industry engagement

Guidance	Current status
through passenger survey Key Performance Indicators (KPIs) or other specific objectives	
Identify the nature of the local transport challenges being faced	Limited assessment without industry engagement
Identify the nature of the local transport challenges being faced	Limited assessment without industry engagement
Determine the different transport options that could be adopted	Limited assessment without industry engagement
Determine the different transport options that could be adopted	Limited assessment without industry engagement
Understand the existing and future market for rail travel	Limited assessment without industry engagement
Demonstrate why a rail based enhancement is most appropriate as part of a package of enhancements or on its own	Limited assessment without industry engagement
Demonstrate why a rail based enhancement is most appropriate as part of a package of enhancements or on its own	Limited assessment without industry engagement
Evaluate which of the potential options for rail investment is appropriate; consideration should be given to rolling stock and timetabling solutions which for some objectives may offer better value for money than investment in a station	Limited assessment without industry engagement
Consider the impact of the proposed option on the operation of the railway	Limited assessment without industry engagement
Consider how the proposed option fits with industry strategy and objectives.	No assessment
A Train Operating Company (TOC) must support the provision of services to the new station and early engagement with TOCs is essential to any proposal.	No engagement
Without a positive business case a scheme will not be taken forward for consideration by railway industry stakeholders. The railway industry encourages promoters to have early discussions to establish the likely viability of proposals and for guidance in preparing a business case. It is vital that rail industry bodies are consulted as early as possible in the development of a proposal for investment in a station. Network Rail and the relevant TOC(s) will be able to gauge the potential viability of a scheme from the outset. They can also provide specific local advice and guidance on operational considerations which must be taken into account in order to develop a successful proposal, and information on any enhancements or changes to service patterns already planned at the station.	No engagement
Operational and performance issues need to be considered at the inception stage of the project and early engagement with Network Rail and TOCs is recommended to establish scheme feasibility. It is important that a proposal for a new station is developed with cognisance of the current and planned service pattern on the route and of existing infrastructure constraints. Engagement with Network Rail is advisable in these cases as they may be able to provide an early view of forthcoming Route Study recommendations	Limited assessment without industry engagement
Having established whether there is a fit with the industry planning framework, a promoter will also need to form an early view as to the appropriate service pattern at the new	Limited assessment without industry engagement

Guidance	Current status
station. This would include the practicality of stopping all or just some of the existing services at the new station, or of introducing new services to serve the facility. The views of the relevant franchising authority should be sought	
Early engagement with the rail industry is indispensable to ensure that proposals for station enhancements or new stations can be developed successfully. Network Rail's route-based Strategic Planning teams act as the first point of contact for promoters. Where Network Rail is involved in the proposed enhancement, Network Rail's Strategic Planning teams will work with developers and local authorities on the scheme throughout the feasibility processes and planning stages.	None
As the day to day operators of stations, TOCs have invaluable knowledge about the needs of their customers and the issues that need to be addressed. They are a key party to any changes that are proposed and should be involved in any proposal from an early stage.	Limited assessment without industry engagement
Early dialogue with industry parties is essential as they can assist promoters in working through these requirements and in some cases take the lead to ensure that certain requirements are met.	None

5.1.9 As recommended by the Council's own advisers, the merits, deliverability and acceptability of the proposed new station can therefore only be confirmed with proper input from Network Rail, at least up to Engineering Stage 2 of the company's PACE corporate governance for assessing new stations, as well as input from other key stakeholders, including but not limited to:

- Passenger Train Operating Companies (TOCs), not least West Midlands Trains (London Northwestern Railway subsidiary), Avanti West Coast, CrossCountry, Caledonian Sleeper, Locomotive Services, West Coast Railways, Rail Operations Group and SLC Rail Operations;
- Rail Freight Operating Companies (FOCs), namely Colas Rail, DB Cargo, DC Rail, DRS, Freightliner, GB Railfreight and Varamis Rail;
- Rail Delivery Group and the Rail Freight Group;
- Department for Transport;
- Office of Rail & Road.

Appendix

Appendix A Freedom of Information response from Network Rail

Source: https://www.whatdotheyknow.com/request/meecebrook_claims_regarding_new



By email: request-906118-c2ae0023@whatdotheyknow.com

Network Rail
Freedom of Information

31 October 2022

Dear [REDACTED]

Information request
Reference number: FOI2022/01225

Thank you for your email of 9 October 2022, in which you requested the following information:

Stafford Borough Council is claiming that a new railway station will be built at a proposed garden village called Meecebrook on the West Coast Mainline.

The proposals are significantly scaled back now and exclude the MOD brownfield site that was originally part of the proposals in 2020.

- 1) Please confirm if a new West Coast Mainline station has been agreed.*
- 2) If it has not been agreed, what stage are proposals at?*
- 3) What would be the approximate total cost of a new station?*
- 4) Who would pay for this?*
- 5) Does a new development on greenfield (instead of brownfield) fit with the Network Rail environmental strategy?*

I have processed your request under the terms of the Environmental Information Regulations 2004 (EIR).¹

¹ The EIR, like the Freedom of Information Act 2000 (FOIA), allows people to access information held by public authorities like Network Rail. When people ask for environmental information, we need to consider the request under the EIR rather than the FOIA. In this case, I am of the view that information relating to major infrastructure proposals meets the definition of environmental information at regulation 2(1)(c) of the EIR because it is information about a measure that impacts the environment.

I have consulted colleagues in our Strategic Planning and Sponsorship teams for the West Coast. They have advised me that they do not hold any recorded information that meets your request. This is because Network Rail is currently assessing the potential impact on the network of some new station proposals, but has not carried out any specific assessments of a proposal for Meecebrook.

Please see below for some advice to help address each of your questions:

1) Please confirm if a new West Coast Mainline station has been agreed.

We have not made any agreements relating to a new station at Meecebrook. As mentioned above, our planners are carrying out work to assess the long-term impact of some new station proposals on the West Coast South route, but this work is not looking at developing the case for, or the deliverability of, a new station at Meecebrook in the short-to-medium term.

2) If it has not been agreed, what stage are proposals at?

There are currently no Network Rail proposals for a station at Meecebrook and our planners have advised that they have not been consulted with directly by Stafford Borough Council or Staffordshire County Council on this subject.

3) What would be the approximate total cost of a new station?

We are unable to advise on this point, as Network Rail has not assessed this.

4) Who would pay for this?

Again, we are unable to advise as we do not have any specific proposals for Meecebrook.

5) Does a new development on greenfield (instead of brownfield) fit with the Network Rail environmental strategy?

As we have not been involved in any proposals, this is not something Network Rail has looked at.

You may wish to find out more from Staffordshire County Council about their proposals – contact details are available at: [Contact - Staffordshire County Council](#)

If you have any enquiries about this response, please contact me in the first instance at [REDACTED] Details of your appeal rights are below.

Please remember to quote the reference number at the top of this letter in all future communications.

Yours sincerely

[REDACTED]

You are encouraged to use and re-use the information made available in this response freely and flexibly, with only a few conditions. These are set out in the [Open Government Licence](#) for public sector information. For further information please visit our [website](#).

Appeal rights

If you are unhappy with the way your request has been handled and wish to make a complaint or request a review of our decision, please write to the Compliance and Appeals team at Network Rail, Freedom of Information, [REDACTED] or by email at [REDACTED]. Your request must be submitted within 40 working days of receipt of this letter.

If you are not content with the outcome of the internal review, you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner (ICO) can be contacted at [REDACTED] or you can contact the ICO through the 'Make a Complaint' section of their website on this link: <https://ico.org.uk/make-a-complaint/>

The relevant section to select will be "Official or Public Information".

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From: Georgina Blackburn
Sent: 12 December 2022 11:31
To: Strategic Planning Consultations; Strategic Planning
Cc:
Subject: Representations to Preferred Options - Land at Uttoxeter Road, Stone
Attachments: Representations_Uttoxeter Road, Stone_Final Draft_12122022.pdf

Dear Sir or Madam,

Representations to Local Plan 2020-2040 Preferred Options Document – Land at Uttoxeter Road, Stone

On behalf of Richborough Estates, please find attached representations to the Local Plan 2020-2040 Preferred Options Document.

I would be grateful if you could confirm receipt of this email and the attachment.

Best wishes,
Georgina

Georgina Blackburn
Planner

 asterplanning.com



Uttoxeter Road, Stone - Part B



Response to the Stafford Borough Local Plan 2020-2040: Preferred Options

On behalf of Richborough Estates Ltd.

In relation to:
Land at Uttoxeter Road, Stone

12th December 2022



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APPENDIX 1 - Site Location Plan

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Prepared By: Jon Power (Associate Partner)

Asteer Planning LLP, [REDACTED]

Version Draft v3

Date: 7th December 2022

INTRODUCTION

- 1.1 Thank you for providing an opportunity to comment on the Stafford Borough Council (herein referred to as “SBC” or “the Council”) Local Plan 2020-2040 Preferred Options Consultation (“Preferred Options”). Asteer Planning LLP (“Asteer”) acts on behalf of Richborough Estates Ltd (“Richborough”) in relation to land under its control at Uttoxeter Road, Stone (“the site”). The land in total extends some 4.62 hectares - a location plan of the site is illustrated below as Figure 1 and enclosed as **Appendix 1**. The site is proposed to be allocated for residential development in the draft Local Plan for 97 dwellings, under Policy 12 (Site ID: STO16).

Figure 1: Site Location Plan



- 1.2 These Representations have been prepared by Richborough to provide comments on the vision, spatial strategy and key policies of the Preferred Options. These Representations fully support the allocation for the site for residential development and demonstrate its availability, suitability and deliverability to provide a high quality residential development as part of a balanced spatial strategy for Stafford Borough and Stone.
- 1.3 The site represents a logical and appropriate extension to the south of Uttoxeter Road in Stone, and is in a sustainable location in the Borough’s second largest town and key

service centre. The site will deliver a mix of family and affordable homes that would support a balanced spatial strategy that meets identified need across the Borough, and which will support growth and vitality of the Borough's second tier settlement. It would deliver development that meets the highest standards of sustainable design, support enhancements in biodiversity and provide accessible / multifunctional community open space.

- 1.4 These Representations are separated into two parts, which include:

Part 1: Comments on the Preferred Options Local Plan & Evidence Base

- 1.5 Providing detailed comments on the Preferred Options Local Plan, including:

1. **The Development Strategy** – including the strategic direction of the Local Plan, the spatial strategy, settlement hierarchy and key strategic policies.
2. **Site ST016** – providing comment on the allocation of Uttoxeter Road, under Policy 12.
3. **Comments on Other Policies** – overarching comments on the detailed policies proposed in the Preferred Options.

Part 2: Land at Uttoxeter Road (ST016)

- 1.6 Demonstrating the availability, suitability and deliverability of the site to provide high quality residential development, in line with the allocation of the site under Policy 12.

1. **Site Context** - a summary of the site in context, including its wider strategic positioning and a description of the site and its surroundings;
2. **Planning Policy Context** - a review of the site within the context of the emerging Local Plan and the reasons why, in policy terms, the site is appropriate for allocation;
3. **Technical and Environmental Considerations** - analysis of the key technical and environmental considerations which will influence the development of the site, and which have informed the preparation of an Illustrative Masterplan.
4. **Deliverability and Benefits** - a summary of the availability, suitability and achievability of the development of the site, and an articulation of the key benefits that the allocation of the site could deliver.

- 1.7 Richborough would welcome ongoing engagement with the Council as the preparation of the Local Plan is progressed and would be happy to discuss any feedback in relation to these representations or the site specific material submitted as part of this Representation and the Call for Sites process. Richborough is committed to working with

the Council as the Local Plan progresses to Regulation 19 and is mobilised to provide any additional technical assessment work required to underpin the allocation of the site.

Part 1: Comments on the Preferred Options Local Plan

1 BACKGROUND & INTRODUCTION

1.1 The Preferred Options consultation was published for comment on 24th October 2022 and contains a range of information, evidence and policy direction on which comment is invited, including:

- **The Preferred Options Local Plan** – which includes housing and employment land requirements, the broad spatial distribution of these uses, proposed development allocations and a range of draft planning policies on topics such as climate change, economic development, housing provision, transport and the environment; and
- **Evidence Base** - a range of new evidence base documents that support the emerging Local Plan’s spatial strategy, land allocations and detailed policies.

1.2 Part 1 of these Representations provide detailed comments on the Preferred Options and its supporting documentation, with particular reference to how it relates to Richborough’s site at Uttoxeter Road and its interrelationship with the wider Local Plan strategy and strategic context. These representations build upon previous submissions by Richborough that have sought to articulate the merits of the site in early Local Plan consultation, including:

- A Call for Sites submission and Illustrative Masterplan – submitted in 2018 and 2020; and
- A response to the “Scoping the Issues” consultation – submitted in July 2018.

2 THE DEVELOPMENT STRATEGY

2.1 This section provides a response to the Preferred Options overarching Development Strategy, including the scale and distribution of development needs and the proposed settlement strategy.

Development Needs

2.2 **Policy 1 (Development Strategy)** of the Preferred Options sets out that between 2020 and 2040, provision will be made for 10,700 new homes (equating to 535 new dwellings per annum (“dpa”)) and 80 hectares of employment land.

2.3 Richborough recognise that the identified housing need encompasses an uplift from the standard method requirement (391dpa) to account for ‘jobs based’ growth (to 435dpa) and to accommodate 2,000 units to meet the unmet needs of neighbouring authorities (an additional 100dpa).

2.4 However, Richborough would also support a more ambitious housing target if the Council considered the higher growth scenarios set out in Lichfields Economic and Housing Development Needs Assessment (“EHDNA”). This includes scenarios including Jobs Growth Regeneration (Scenario E), supporting a requirement of 646dpa (or 711dpa including PCU¹), and Past Trends (Scenario F), which would support a requirement of 683dpa (or 746 dpa including PCU).

2.5 Higher growth scenarios may underpin a level of jobs growth that supports regeneration aspirations, reflects evidence of strong delivery in past trends, better addresses worsening affordability across the Borough and could support a higher level of growth in Stone.

2.6 Notwithstanding this, the allocation of ST016 provides an accessible and deliverable site in Stone that can deliver high quality market and affordable homes to meet the Borough’s need early in the Plan Period and should be considered critical to the supply of new homes in the emerging Local Plan.

¹ Partial Catch Up

The Settlement Strategy & Spatial Distribution

Settlement Hierarchy

- 2.7 Policy 2 (Settlement Hierarchy) sets out the Preferred Options proposed settlement hierarchy. Richborough strongly supports the identification of Stafford (Tier 1) and Stone (Tier 2) at the top of the settlement hierarchy, which is in line with Government policy and reflects the size, scale and function of these settlements.
- 2.8 Richborough supports a focus of new development on the highest Tiers of the settlement hierarchy, which is fundamental to a balanced spatial strategy. Stone is an important market town and clearly defined as the second principal town in the Borough and a main provider of services, facilities, employment and accessible transport links.

Spatial Distribution

- 2.9 The Preferred Options identifies the spatial distribution of homes to meet its identified housing need across the Borough during the next Plan Period. Policy 1 (Development Strategy) sets out the broad distribution of housing supply across the Borough as follows:
- Stafford (59%).
 - Meecebrook (24%).
 - Stone (7%).
 - Windfall (6%).
 - Larger settlements (4%).
 - Smaller settlements (<1%).
 - Rural areas (<1%).
- 2.10 Just 7% of the Borough's housing supply is distributed to Stone. Whilst Richborough supports the allocation of the site and the direction of new development towards Stone, it does consider that Stone, as a major service centre and market town, could accommodate significantly more than 7% of the Borough's housing needs. In particular, in line with other Representations made to the Preferred Options by Richborough, it is considered that Stone or the Borough's 'larger settlements' are a fundamentally more sustainable and accessible locations for growth than the Meecebrook Garden Community – which is not in an accessible location and predicated on the delivery of a significant level of infrastructure; including a new railway station on the West Coast Mainline.

3 SITE ALLOCATION ST016

3.1 Richborough **fully supports the allocation of land at Uttoxeter Road under Policy 12 (Site ST016)**. Part 2 of these representations have been prepared to underpin the allocation and ultimate delivery of the site and Richborough is committed to continuing to work with the Council to support the Local Plan as it moves towards Regulation 19 stage.

3.2 Policy 12 (Part C) states that *“development requirements that the development of the sites allocated in this policy need to meet are listed in Appendix 2”*. Appendix 2 of the Preferred Options sets out the “Essential Site-Specific Requirements” for Site ST016, which includes the following (with Richborough’s comments on each requirement):

“Mitigation measures required by Network Rail. These include: ANPR – Red light traffic enforcement cameras, Vehicle activated lights, Yellow box markings on the crossing, Decking (provision of new Strail decking)”.

3.3 Richborough acknowledges and has considered the requirements of Network Rail when considering the design, feasibility and viability of a scheme for the site. Richborough is committed to working with Network Rail to deliver the required mitigation measures as a detailed scheme for the site is prepared.

“Retain woodlands, in-field trees, hedgerows and areas of scrub or provide scrub as part of any design schemes”.

3.4 Richborough supports this policy requirement and has demonstrated in its Illustrative Masterplan at Appendix 2 how a sensitive landscape-led scheme for the site could be developed to retain existing mature trees, hedgerows and on-site ecological corridors.

“Ensure that ponds just outside of the site boundary are effectively protected and that no run-off or pollutants are allowed to enter and degrade the habitat or water quality. If possible, seek to enhance habitats”.

3.5 Richborough supports this policy requirement and will ensure that there will be no adverse impacts on the habitat or water quality of adjacent ponds and waterbodies. In addition, the proposed masterplan seeks to incorporate significant areas of ecological enhancement and biodiversity corridors that will seek to deliver Biodiversity Net Gain (“BNG”) that meets Government targets.

“Incorporate species rich grassland creation/enhancement into any design schemes”.

- 3.6 As set out above, Richborough is committed to securing BNG enhancement as part of the scheme and will work with the Council on the type and location of any habitats as a detailed scheme for the site is developed.

“A positive frontage should be provided to Uttoxeter Road”.

- 3.7 Richborough supports this policy requirement and is committed to ensuring the site delivers a positive frontage to Uttoxeter Road as a key gateway into Stone.

Site Selection

- 3.8 Richborough supports the assessment of the site and its ultimate selection as a proposed allocation, which is set out in the following documents:

- Site Selection Topic Paper (October 2022);
- Site Assessment Profiles (October 2022);
- Strategic Housing and Employment Land Availability Assessment (August 2022); and
- Stafford Borough Local Plan Interim Sustainability Appraisal (October 2022).

- 3.9 The Council Site Assessment Profiles (2022), which support the Preferred Options, list the sites which passed Stage 2 of the site assessment process. Site ST016 is concluded to be a ‘Proposed Allocation’ with the following comments under each topic area²:

- **Education** - First School: St Michael’s CE First School. Development can be accommodated within existing capacity. Middle School: Walton Priory Middle School. Development can be accommodated within existing capacity. High School: Capacity at Alleyne’s Academy to be confirmed.
- **Transport** - Mitigation measures required on level crossing, which would need to be funded by developer. Accessibility Score: 4/6.
- **Ecology** - Medium / Low overall ecological sensitivity. Red Great Crested Newt risk impact zone.
- **Landscape** - Medium overall landscape sensitivity.
- **Heritage** - Low direct impacts, Low setting impacts. No substantial harm.

² Site Assessment Profiles (October 2022), p245

- **Water** - Low potential impact on sewerage infrastructure. Low potential impact on surface water sewerage infrastructure.
- **Electricity** - No issues for the site.

3.10 Richborough generally supports this assessment, which clearly demonstrates the limited constraints that impact the site, which are reinforced and further demonstrated in Part 2 of these Representations. Furthermore, the site was considered to be available, suitable and achievable in the Council’s Strategic Housing and Employment Land Availability Assessment (“SHELAA”), concluding that *“the site is potentially developable based on the compliance with Policy C5 of the Local Plan and Paragraph 72 of the NPPF³”*.

Delivery and Housing Trajectory

- 3.11 The Housing Trajectory for the Preferred Options is provided at Appendix 6 of the document, and assumes that the housing allocations listed in Policy 12 will start to deliver units in 2025/26 (individual sites are not split out, but this includes Site ST016).
- 3.12 Richborough considers that Site ST016 can deliver units at the very start of the Plan Period, to balance the supply of larger strategic sites which will take significantly longer to undertake lead-in and commence delivery. Richborough has extensive experience working with nationally significant development partners and, on average, work to a completion rate per sales outlet of 50 dpa for both market and affordable housing provision. The following table sets out how the site could be delivered by Richborough to meet need early in the Plan Period and in line with the Council’s Housing Trajectory.

Indicative Timescales and Key Milestones

February 2024	Local Plan Examination
Autumn 2024	Issue of Inspectors’ Report
Autumn 2024	Richborough prepare Outline Planning Application following Main Modifications and issue of Inspectors’ Report (subject to findings). Pre-app with the Council to be undertaken in Summer 2024.
End 2024	Local Plan adopted
End 2024	Outline Planning Application submitted
Q1 2025	Application determined
Q2 2025	Site disposal to developer partner

³ SHELAA (August 2022), p129

Q3 2025	Preparation and submission of reserved matters application
Q4 2025	Reserve matters application consented, and conditions discharged
Q1 2026	Start on site
Q3/Q4 2026	Occupation of first home
2027/28	Development complete (based on a development rate of 50dpa for both market and affordable housing).

Summary

- 3.13 In summary, Richborough **strongly supports the allocation of the site ST016 and is fully committed to developing a detailed scheme for the site so it can be brought forward early in the next Plan Period.** Richborough would welcome further dialogue to support the evolution of the Local Plan as a Regulation 19 draft is prepared.

4 OTHER POLICIES

4.1 Richborough generally supports the detailed policies prepared to support the Local Plan, however, as an overarching comment, would seek to ensure that flexibility is retained within the policy framework to ensure that sites can be viably delivered. The Council's whole of Plan Viability Assessment, as it is further developed, should be fully cognisant of the impact of a range of policy requirements on the delivery of sites and the delivery of the Local Plan overall.

4.2 Richborough's specific comments on some of the detail Preferred Options policies is provided in the following table:

Policy	Overarching Comments
<p>Policy 4 (Climate Change Development Requirements):</p> <p><i>Net zero operational energy: residential</i></p> <p><i>B. In order to demonstrate net zero carbon operational energy, all new dwellings must demonstrate through an energy statement, that the following have been achieved:</i></p> <p><i>1. No on-site fossil fuel combustion;</i></p> <p><i>2. Energy use is minimised, demonstrated through space heating demand of less than 15kWh/m²/year and operational energy use of less than 35kWh/m²/year; and</i></p> <p><i>3. On-site renewable generation is maximised, equivalent to at least the on-site energy demand.</i></p> <p><i>Alternatively, compliance can be demonstrated through Passivhaus Standard accreditation, using the Passivhaus Planning Package.</i></p>	<p>Whilst Richborough fully support the move towards net zero, it is important to ensure that policy is flexible, reflective of emerging policy / legislation and does not impact on the delivery of new development.</p> <p>Part L (conservation of fuel and power) and Part F (ventilation) of the Building Regulations were updated in 2021 and took effect from 15th June 2022, with transitional arrangements in place for dwellings started before 15th June 2023.</p> <p>The implementation of the Future Homes Standard 2025 will ensure that new homes will produce at least 75% lower CO₂ emissions than ones built to previous energy efficiency requirements. By delivering carbon reductions through the fabric and building services in a home, rather than relying on wider carbon offsetting, the Future Homes Standard will ensure new homes have a smaller carbon footprint than any previous Government policy. Therefore, if the Council wishes to move away from these national standards it will need to provide up to date and locally specific evidence as to why this is the case. The Council will also need to justify the</p>

	<p>requirement for the space heating demand of less than 15kWh/m²/year and operational energy use of less than 35kWh/m²/year.</p> <p>Part E of Policy 4 also states that development must also incorporate water efficient features and equipment to achieve a maximum water usage of 110 litres per person per day. Under current Building Regulations, all new dwellings must achieve a mandatory level of water efficiency of 125 litres per day per person, which is a higher standard than that achieved by much of the existing housing stock. If the Council wishes to adopt the optional standard for water efficiency of 110 litres per person per day, then the Council should justify doing so by applying the criteria set out in the PPG.</p>
<p>Policy 23 (Affordable Housing)</p> <p><i>The policy notes that 40% affordable is required on greenfield sites in 'Stone Rural' and 20% required in 'Stone'.</i></p>	<p>The plan in the Preferred Options and the Aspinall Verdi Viability Assessment (2022) is relatively ambiguous and does not clearly identify the value zones in the Borough. However, the allocation is an extension to Stone with the settlement boundary amended to include it as part of the town. Consequently the amendment to the settlement boundary and allocation of the site within Stone would mean the site is part of "Stone" and not "Stone Rural" – this required to deliver 20% affordable housing. Clarification on this is welcomed as the Plan moves towards Regulation 19 stage.</p>
<p>Policy 24 (Homes for Life)</p> <p><i>Accessible and adaptable dwellings.</i></p> <p><i>A. On major development proposals for residential dwellings at least 10% of all new build dwellings distributed evenly across market and affordable tenures shall be built to Building Regulations Part M4(2) standards for accessible and adaptable dwellings.</i></p>	<p>Richborough consider that the Council will need to ensure that the viability implications of the M4(2) and M4(3) requirements are fully considered in relation to the Local Plan viability assessment.</p>

<p><i>B. On developments, including mixed developments of market and affordable housing, that would provide 10 or more affordable dwellings, at least 10% of those affordable dwellings shall be built to Building Regulations part M4(3) wheelchair accessible standard.</i></p>	
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Part 2: Site ST016 - Land at Uttoxeter Road

1 THE SITE IN CONTEXT

- 1.1 The site forms a natural and logical extension to southern edge of the Stone urban area, with direct access to the existing strategic road network (via the Uttoxeter Road and the A31/A34). The site is suitable, available and achievable and can deliver residential development within the first five years of the Plan Period. There is a clear case for an amendment to the settlement boundary in Stone and the site is in a highly sustainable location for residential development that supports a balanced spatial strategy to meet the wider needs of the Borough.

Strategic Context

- 1.2 Stafford Borough is strategically located at the heart of the Stoke-Staffordshire region and is exceptionally well positioned to be at the heart of wider regional growth. It has excellent highways and rail connectivity and has inherent physical and economic links to the North West and West Midlands regions, with close geographical accessibility to Stoke-on-Trent, South Cheshire and Staffordshire.
- 1.3 The Borough's geography, coupled with its excellent road and rail links, means that it is exceptionally well positioned to act as a catalyst for wider regional growth, which capitalises on its locational advantage and will be further bolstered by HS2, which will allow travel between Stafford and London Euston in just 55 minutes. Stone itself has excellent road and rail links and is strategically located to capitalise on the enormous growth potential of the Borough.
- 1.4 The arrival of HS2 in Stafford presents huge opportunities across the Borough. Providing the type and quality of homes and infrastructure to support the arrival of HS2 will set the platform to catalyse the future growth of the Borough for the next generation. These opportunities are recognised by the Constellation Partnership Growth Strategy⁴, which envisages the arrival of HS2 to support the delivery of at least 120,000 new jobs, 100,000 new homes and £6 bn per year of Gross Value Added ("GVA") by 2040⁵.
- 1.5 There is a clear opportunity for the Borough to grow during the next Plan Period; supported by its strategic location, excellent connectivity and its generational growth catalysts, such as HS2. It is fundamental that this growth is underpinned by the type and quality of housing and infrastructure that will realise its potential supporting the growth of Stafford by delivering a balanced spatial strategy that meets need and provides housing choice

⁴ Including the authorities of Stafford, Staffordshire, Newcastle-under-Lyme, Stoke-on-Trent, Staffordshire Moorlands, Cheshire East and Cheshire West and Chester

⁵ Constellation Partnership Growth Strategy (October 2018)

across the whole Borough. The allocation of Site ST016 will fully support the potential for this growth, particularly early in the Plan Period.

The Site & Surroundings

- 1.6 The site comprises approximately 4.62 ha of land adjoining the south-eastern edge of Stone, which is currently used for agricultural purposes. The site is bounded to the north by existing residential development and Uttoxeter Road (B5027); to the east by a track which provides access to Little Stoke Farm, and beyond by the Little Stoke Cricket Club and undeveloped agricultural land; to the south by undeveloped agricultural land; and to the west by the West Coast Mainline and beyond by existing residential development. The southern development edge of Stone on the western side of the West Coast Mainline extends as far south as Little Stoke Farm.
- 1.7 The surrounding area is predominantly residential in character, with the built-up area comprised of housing, services and employment areas. The edge of the main town centre of Stone is approximately 1.5-2km to the north west of the site.
- 1.8 The site has previously been the subject of two planning applications for residential development (ref: 14/21316/OUT and ref: 16/24533/OUT). However, these applications were subsequently refused due to the site being located beyond the settlement boundary, at a time where the Council was able to demonstrate a five-year supply of housing sites. It is important to note that neither application was subject to a refusal due to a technical matter or due to the site being inappropriate for residential development (if the Council had considered a need to exist).

Accessibility

- 1.9 The site is in a highly accessible and sustainable location, within walking distance of a number of existing services and facilities. As discussed, the site is approximately 1.5-2km from the southern edge of Stone town centre, which provides a range of shops and services, including food stores, post offices and other day-to-day facilities. The site is also located within 1.5km of Stone Business Park which includes a range of industrial and commercial businesses.
- 1.10 The following services and facilities are within acceptable walking distances for common trip purposes:
- Little Stoke Cricket Club and Bowling Green - 100m
 - Smartys pre-school nursery - 300m

- Three Crowns Public House - 350m
- Fairway Service Station (convenience store/newsagent, car garage and petrol station) - 350m
- St. Michael's Church of England First School - 1,000m
- Aston Marina Farm Shop and Bistro - 1,100m
- Stone Cricket Club - 1,400m
- Mansion House Health Surgery - 1,850m

1.11 The site is uniquely positioned to provide new homes that will support the future growth requirements of Stone, contributing positively to the creation of a strong local economy and providing new homes that benefit from good accessibility.

Transport Accessibility

1.12 The site benefits from genuine opportunities to utilise sustainable transport modes such as bus and train services, which are available within the centre of Stone. In particular, Stone Railway Station benefits from hourly services between Manchester, Crewe and London Euston, via Stafford.

2 PLANNING POLICY POSITION

- 2.1 The emerging Stafford Local Plan offers an opportunity for the Borough to plan its future growth in locations that are sustainable, and which complement a spatial strategy that directs need to the locations where it is most required. Stone is identified as the second largest settlement in the Borough's settlement hierarchy, second only to Stafford; presenting an appropriate location for sustainable growth.

Adopted Development Plan

- 2.2 The current Development Plan for Stafford Borough includes the Plan for Stafford Borough (adopted in June 2014) and the Plan for Stafford Borough - Part 2 (adopted in January 2017). Richborough supports a full review of the Local Plan to deliver an updated Development Plan that can appropriately plan for the long term spatial growth and identified needs of the Borough.

The Supporting Case for Allocation

- 2.3 The site presents an excellent opportunity for sustainable development via a logical and natural extension to the southern edge of Stone and, therefore, there is a strong case that supports the draft allocation of the site and its subsequent development during the next Plan Period. The remainder of this section supports the allocation of Site ST016 and sets out the reasons why the allocation should be carried through to adoption.

Supporting a Balanced Spatial Strategy

- 2.4 With only 7% of the Borough's housing supply is distributed to Stone, the allocation of the site is essential to delivering growth in Stone during the next Plan Period. Stone, as a major service centre and market town, requires growth to support its vitality and to meet its local housing needs for the next Plan Period; and deliverable sites are essential to achieve this.

A Logical Extension to Stone

- 2.5 The site forms a natural extension to the to the southern edge of Stone, bounded by Little Stoke Farm and recreational uses to the east, Uttoxeter Road to the north and the Rail Line to the west. To the south, an opportunity exists to round off the existing southern settlement edge of Stone that extends as far as Little Stoke Farm to the west. The site has also been demonstrated to be sustainable in terms of its proximity to existing services and facilities with public transport providing links to further facilities and services.
- 2.6 The Illustrative Masterplan contained in Appendix 2 demonstrates how a sensitive landscape-led development, alongside multi-functional Green Infrastructure, could be

brought forward as a natural extension to the settlement that meets the specific policy requirements of Policy 12 of the Preferred Options.

Meeting Housing Needs

- 2.7 As set out earlier in these representations, Richborough consider that there is a compelling case to deliver a higher level of housing growth in the next Plan Period. Notwithstanding this, the delivery of the site is critical to meeting need in Stone – providing a viable and deliverable site that can meet the market and affordable housing needs of the Borough early in the next Plan Period.

Providing Housing Quality, Mix and a Diversity of Homes

- 2.8 It is critical that the Council provides not only the quantum of housing to meet its needs; but the mix, type and quality of housing in the locations that will support the growth of the Borough. In this context, the site can provide the type and quality of housing in Stone that will ensure that housing choice is provided for the next generation during the Plan Period.

Affordable Housing and Supporting Affordability

- 2.9 The EHDNA has identified significant affordability issues in the Borough (with demand exceeding supply) and a need for between 252 and 389 affordable homes per annum between 2020 to 2040. The site will support the delivery of affordable homes in a sustainable location, which will support the Council's supply of affordable housing during the Plan Period. The site is able to deliver a policy compliant level of affordable housing.

A Developable and Deliverable Site

- 2.10 As demonstrated in the following section, the site does not have any technical or environmental constraints that could not be mitigated, which would prevent the allocation being adopted and a sensitive residential development being brought forward at the site.

Summary

- 2.11 In summary, there is a strong case that supports the draft allocation of the site in the emerging Local Plan. The allocation of the site could support an appropriate spatial strategy that reflects the role of the Stone as a Tier 2 settlement and deliver a sensitive development that respects the scale and character of its surroundings. The following section considers the specific technical and environmental considerations that will influence the development of the site.

3 TECHNICAL AND ENVIRONMENTAL CONSIDERATIONS

- 3.1 An Illustrative Masterplan has been prepared to reflect a sensitive design-led response to the site, underpinned by detailed technical analysis that has considered site opportunities and constraints. It has demonstrated that the proposed allocation could be sensitively brought forward that responds to the site's characteristics and respects the character of the surrounding area.
- 3.2 As discussed previously, detailed applications have been prepared for the site (for 85 units) in 2014 and 2016 which have provided as deep understanding of the technical considerations that will underpin the site's delivery, and which demonstrated that there were no technical or environmental impediments to the sites being developed. This section draws on these assessments, which will be updated and reviewed as a detailed application is brought forward to deliver the site.
- 3.3 It should be noted that these applications raised no objections from key consultees; including the Environment Agency, the Council's Environmental Health team, the Council's Biodiversity Officer, Tree Officer and the Council's Contaminated Land Officer.
- 3.4 An Illustrative Masterplan which provides a design response to the key technical and environmental considerations is provided at **Appendix 2**.

Highways and Access

- 3.5 MEC has previously advised on the vehicular access options and highways capacity of the site, to demonstrate that the site is accessible, can be accessed safely and will be adequately accommodated into the local highways network.
- 3.6 Vehicular access is proposed to be taken from a newly constructed access road off Uttoxeter Road. This access road will connect with Uttoxeter Road via a T junction and is shown on the Illustrative Masterplan.
- 3.7 Previous capacity assessments have been undertaken at a number of junctions in the vicinity of the site to determine the impact the development has in this location – based on a scheme of 100 units (as a conservative assessment). Traffic counts were carried out at these junctions. Three scenarios were considered, these being 2016 Surveyed Flows, 2021 Factored + Committed Development Flows and 2021 Factored + Committed + Proposed Development flows.
- 3.8 The results of the capacity assessments demonstrated that the impact of the proposed development on the local highway network is minimal, with all the junctions assessed operating well within capacity with the proposed development flows in place. Whilst these

assessments are out of date and will be updated, it is not anticipated taking into account post-Covid traffic scenarios, that there will be any capacity issues that cannot be suitably mitigated.

- 3.9 It should be noted that the local highways authority had no objection to the 2016 planning application on highways or access grounds.

Ecology and Trees

Ecology

- 3.10 Previous ecological appraisal work at the site (undertaken by Tyler Grange to support the 2016 application) concluded that, subject to a strategy for mitigation and biodiversity enhancement, the proposed development would be in conformity with relevant planning policy and legislation.
- 3.11 The appraisal concludes that mitigation and enhancement strategy could be controlled by appropriately worded planning controls devised to:
- Secure the Reasonable Avoidance Measures for Great Crested Newts;
 - Update badger surveys;
 - Undertake detailed surveys on any trees to be lost which may have the potential to support bat roosts;
 - Secure protection for ecological important features including scrub, hedgerows and trees; and
 - Secure provision and maintenance of habitats for wildlife.
- 3.12 Based on the masterplan at Appendix 2, it is considered that the parameters of development sought would be able to avoid adverse impacts in the first instance or being able to accommodate any necessary mitigation. In addition, the site will deliver Biodiversity Net Gain that meets at least current Government targets of 10%. In assessing the 2016 application, the Council's Biodiversity Officer had no objections to the development, subject to suitable mitigation.

Trees

- 3.13 There are no TPOs within the site and the trees that are present reside primarily on the boundaries of the site and within the northern extent of the site. The Illustrative Masterplan provided at Appendix 2 demonstrates how a sensitive landscape-led scheme

would be able to retain mature trees and valuable hedgerows as part of any development. It is noted that there were no objections from the Tree Officer to the 2016 planning application and therefore, subject to suitable retention and mitigation, there are no arboricultural issues that would prevent the site being brought forward for development.

Landscape

- 3.14 A Landscape and Visual Impact Assessment (“LVIA”) has been previously carried out at the site by Tyler Grange to support the 2016 application; in order to determine the ability of the site (in landscape and visual terms) to accommodate development, and to assess the likely impact on landscape character and visual amenity should development come forward.
- 3.15 The assessment concludes that, overall, character effects are localised and that visual effects are largely limited to the site and its immediate surroundings. The majority of the relevant landscape (adopted) policy objectives and SPD/SPG criteria are satisfied through an appropriate development response that responds to the site specific criteria and established landscape strategy. It is noted that the Local Planning Authority did not challenge the findings of the LVIA in the 2016 application and concluded that if the need for housing were to be established, then any landscape and visual impacts would not be sufficiently great to justify a refusal.
- 3.16 Further detailed and updated landscape and visual assessment work can be undertaken, where required, as the Local Plan is progressed.

Flood Risk & Drainage

- 3.17 The site is entirely located in Flood Zone 1 which has the lowest risk of flooding (defined as land as having less than 1 in 1000 years’ annual probability of flooding).
- 3.18 The previous planning application received no statutory objection in relation to flood risk, noting that the applicants Flood Risk Assessment identified no impediment to the proposed residential development. It was recommended that the specific design details of proposed surface water and foul water drainage systems could be secured via condition. In summary, it is not considered that, with suitable mitigation, there are any flood risk or drainage constraints preventing the site being brought forward for residential development.

Heritage & Archaeology

- 3.19 A listed building is located approximately 200m to the west of the site access, immediately adjacent to the level crossing on Uttoxeter Road, but it is not visible from the

site. As such, it is not considered that there are any heritage constraints that would prevent the site being brought forward for development, subject to sensitive design that respects the character of the surrounding area.

Ground Conditions

- 3.20 The site is largely flat in terms of site levels and there are no topographical constraints to it being brought forward for development.
- 3.21 A Phase 1 assessment of ground conditions has previously been undertaken by MEC. It identifies a small number of potential risks to identified receptors, associated with the current site conditions and the previous agricultural site usage of the site. However, it is not anticipated that, subject to further intrusive assessment at the detailed design stage and suitable mitigation, that there are any significant constraints to development with respect to contamination or ground conditions.

Utilities & Infrastructure

- 3.22 A Utilities Assessment has previously been undertaken by MEC. It concludes that there is available capacity within all major utilities to accommodate the development of the site. As such, it is not anticipated that there are any significant utilities infrastructure constraints that would prevent the site from coming forward for development, subject to further updated assessment work being undertaken.

Air Quality & Noise

- 3.23 The site is not within an Air Quality Management Area ("AQMA") and there are not anticipated to be any air quality constraints that would prevent the site being brought forward for development. A Noise Assessment has previously been undertaken by MEC, which concluded that subject to mitigation (including a combination of acoustically sound fencing and acoustically treated glazing and passive ventilation), that recommended noise levels can be achieved.
- 3.24 Further noise and air quality assessment work will be undertaken as detailed plans for the site are developed; however, there are not considered to be any air quality or noise constraints that would prevent the development of the site for residential use.

Agricultural Land

- 3.25 An assessment of the agricultural quality of the land has previously been undertaken which confirms that the site is not the best and most versatile agricultural land (comprising a mix of Grade 5 and Grade 3b agricultural and non-agricultural land).

Sustainability & Energy

- 3.26 Richborough is committed to responding proactively and robustly in addressing and mitigating the adverse impacts of climate change and is fully supportive of the UK Government's targets for reductions in greenhouse gas emissions. Richborough will seek to design a development that has holistic low energy, passive design concepts involving a fabric first approach and high emphasis on energy efficiency.

Summary

- 3.27 In summary, extensive technical work has previously been undertaken to understand the site constraints and opportunities. This has been used to inform the design evolution and underpin a deliverable masterplan for the site, which demonstrates how a landscape-led scheme for residential uses could be brought forward.
- 3.28 It is important to note that previous planning applications on the site demonstrate that, from a technical and environmental point of view, there are no constraints to the development of the site subject to suitable mitigation measures being implemented.

4 DELIVERABILITY & BENEFITS

4.1 The Illustrative Masterplan at Appendix 2 provides one example of how land at Uttoxeter Road could bring forward a landscape-led scheme early in the Plan Period.

4.2 The site is in a highly accessible location that will support a sustainable pattern of development that delivers a spatial strategy that meets need, early in the Plan Period, in a key service centre in the Borough. This section provides a summary of the deliverability of the site and an assessment of the key benefits that allocating the site for development would bring to Stone.

A Deliverable Site

4.3 The NPPF seeks to ensure that deliverable sites are provided in appropriate locations to meet housing needs and support economic growth. To be considered deliverable, sites should be available, suitable and achievable and should be available to be brought forward within a realistic timeframe once the Local Plan is adopted.

4.4 Richborough is fully committed to the site and consider that it could be brought forward immediately on adoption of the Local Plan to meet the housing needs of the Borough. In summary the site is:

- **Available** – Richborough has entered into an agreement with the landowner to promote the site for residential development – and it also has the option to consider further land to the south of the allocation, if required. Richborough has a proven track record of facilitating the delivery of high-quality housing developments on suitable and sustainable sites and can confirm that the site can be delivered for housing within the early phases of the Local Plan period. Richborough are strong advocates of a plan-led system and are committed to promoting land for residential development by engaging actively with local authorities, parish councils and other neighbourhood forums through local and neighbourhood plans.
- **Suitable** - the site is entirely suitable for a residential development for the following reasons:
 - It offers a highly accessible and sustainable location for development that would support a balanced spatial strategy, deliver much needed growth in Stone and which could be brought forward early in the Plan Period following any allocation.
 - It is a logical and natural extension to the southern edge of Stone that is not within the Green Belt.

- There are no environmental or technical constraints that are considered to prevent the development of the site, subject to suitable mitigation and a sensitive approach to design – as demonstrated by previous applications and engagement with statutory consultees.
 - It can deliver satisfactory vehicular access and has access to the strategic highway network via Uttoxeter Road.
- **Achievable** – the Illustrative Masterplan demonstrates how the site responds to its physical characteristics, technical considerations and surrounding context by providing a sensitive landscape-led scheme. An assessment of the site constraints illustrates that delivery of the entire site is achievable, and a professional team of technical experts has supported detailed design. Where any potential constraints have been identified, Richborough has considered the necessary mitigation measures and required investment in order to overcome any deliverability barriers. Richborough has reviewed the economic viability of the scheme in terms of the land value, attractiveness of the locality, level of potential market demand and projected rate of sales in Stone; as well as the cost factors associated with the site including site preparation costs and site constraints. In addition, Richborough has extensive experience working with nationally significant development partners. Developer partners who have built out Richborough sites include Bellway, Barratt David Wilson, CALA, Miller, Mulberry, Kier, Lion Court, Taylor Wimpey and Vistry. On Richborough's sites, the average completion rate per sales outlet is a combined rate of 50 dpa for both market and affordable housing provision. Richborough confirms that the development of the site is economically viable, deliverable and achievable in accordance with the NPPF.

Key Benefits

- 4.5 The allocation of the site will support new housing in an appropriate location and ensure that a quantity, quality and mix is provided to support the economic growth of Stafford Borough. The delivery of the site will provide significant benefits to the Borough and to Stone. These are summarised as follows:

Economic Benefits

- 4.6 The development of the site will have significant economic benefits, both from its construction and occupation. Key economic benefits may include:
- Generating investment during the construction phase of development through construction cost, FTE construction jobs and an increase in GVA.

- Providing long term occupational / operational benefits including new resident expenditure, attracting new residents to SBC, generating flow on and supported jobs and, overall, generating increased economic output in the Borough.
- Generating significant revenue for the Local Authority, with a development of new homes generating revenue in Council Tax revenue, New Homes Bonus and through Section 106 contributions.
- Underpinning the catalytic growth opportunities in Stafford and Stone by providing the type, quality and spatial distribution of homes in Stafford that will allow the Borough to capitalise on its locational advantages and the arrival of HS2.

Social Benefits

4.7 The delivery of the site will have clear social benefits for existing and future residents, in terms of providing better choice, improving access to amenities and meeting a variety of identified housing needs. The key social benefits include:

- Delivering high quality market homes to meet the needs of the Borough's existing and future employees, supporting the future growth of the Borough.
- Providing viable and deliverable affordable homes to address the Borough's affordability crisis and support the housing of key workers and other first time buyers. The site will provide, at a minimum, a policy compliant level of affordable housing.
- Delivering new and accessible multifunctional open spaces, amenity spaces and green infrastructure to benefit existing and future residents.

Environmental Benefits

4.8 The development of the site has the potential to uplift the biodiversity, accessibility and overall enjoyment and environmental value of the site. In addition, the site has the potential to be an exemplar in sustainable design and construction. Key environmental benefits include:

- The site will create new habitats for a range of species and will seek to provide a biodiversity net gain (of at least 10%) on-site.
- The provision of multi-functional green infrastructure and open space that will generate significant recreational benefits for existing and prospective residents.

- The protection and enhancement of existing features of the site that add value, including mature trees and hedgerows – including the retention of the existing trees/hedgerow that dissects the site as a new ecological corridor.

SUMMARY

- 4.9 This response has been prepared by Richborough to provide detailed comments on the vision, spatial strategy and key policies of the Preferred Options; and to demonstrate the availability, suitability and deliverability of the proposed allocation at Uttoxeter Road (Site ST016) to provide a high quality residential development as part of a balanced spatial strategy for Stafford and Stone.
- 4.10 Richborough **strongly supports the allocation of the site and is committed to supporting the Council in providing any information required to underpin the allocation** as the Regulation 19 Plan is prepared. Richborough would welcome ongoing engagement with the Council as the preparation of the Local Plan is progressed and would be happy to discuss any feedback in relation to these representations or the site specific material submitted as part of this Representation.

Appendix 1 - Site Location Plan



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DO NOT SCALE DRAWINGS.

No liability or responsibility is accepted arising from reliance upon the information contained within this drawing.

Application Site Boundary

Client:
Richborough Estates

Project:
Land at Uttoxeter Road, Stone

Drawing:
Site Location Plan

Scale:
1:1,250 (A3)

Status:
Planning

Project Number:
RICM2001

Drawing Number:
1000



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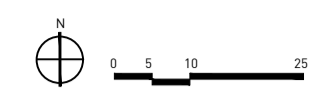
Appendix 2 – Illustrative Masterplan

The contractor is responsible to ensure that no products are to be utilised that do not comply with relevant British and/or European Standards and/or Codes of Practice, COSHH Regulations, Construction Regulations, or which are known or suspected at the time of product selection and/or construction to be deleterious to health and safety or to the durability of the work or not in accordance with good building practices. The contractor is responsible for checking dimensions, tolerances, levels and references. This drawing is to be read in conjunction with all relevant consultants or specialists drawings. Any discrepancy to be notified to Baily Garner LLP and rectified before proceeding with the works on site or shop drawings. Where an item is covered by drawings to different scales, the larger scale drawing is to be worked to. Do not scale drawings. Figured dimensions to be worked to in all cases. This drawing and the copyrights and patents therein are the property of Baily Garner LLP and may not be used or reproduced without consent or attribution.

Baily Garner LLP



REVISION	D	C	DATE



KEY

- Site location
- Proposed residential development
- Public open space 4.38 Acres 1.77 Hectares
- New landscape
- Existing trees and hedgerow
- Trees proposed to be removed
- Children's play
- Sustainable drainage
- Key pedestrian cycle routes
- Public footpath

DESIGN NOTES

1. Indicative new vehicular and pedestrian access via Uttoxeter Road;
2. Positive frontage, continuing existing building line;
3. Existing Severn Trent easement (fenced, not POS);
4. Private access to existing farm relocated;
5. New cricket fence and netting;
6. Focal green incorporating veteran tree;
7. Trees recommended for removal;
8. Swale and ecology corridor;
9. Circular walk with active (car-free) frontage;
10. Existing trees and bank;
11. Sustainable drainage;
12. Adoptable standard looped street;
13. Existing hedgerow;
14. Landscaped ridge;
15. Active frontages;
16. Retaining structures; and
17. Land re-grading with vehicular barriers in front of adjacent railway.

POTENTIAL PHASING

	Gross site area: 5.04 Acres/ 2.04 Hectares Net residential area: 2.5 Acres/ 1.01 Hectares Open space: 2.17 Acres/ 0.88 Hectares Efficiency: 50%
	Gross site area: 2.52 Acres/ 1.02 Hectares Net residential area: 1.44 Acres/ 0.58 Hectares Open space: 0.84 Acres/ 0.34 Hectares Efficiency: 57%
	Gross site area: 3.57 Acres/ 1.44 Hectares Net residential area: 2.08 Acres/ 0.84 Hectares Open space: 1.37 Acres/ 0.55 Hectares Efficiency: 58%

- NOTES
- This drawing is for illustrative purposes only and subject to detailed design.
 - All plotted boundaries indicated are subject to title confirmation.
 - Based on preliminary Richborough constraints plan (ref:RE-URS-CO-01).



CLIENT:
RICHBOROUGH ESTATES LTD

PROJECT:
LAND OFF UTTOXETER ROAD
STONE

JOB NUMBER	DRAWING NUMBER	REVISION
34492	1	-
DATE:	D	C
19.10.2022	CJL	CJL
SCALE:	1:10000A1	
PURPOSE OF ISSUE:	PRELIMINARY	

From: Georgina Blackburn
Sent: 12 December 2022 11:32
To: Strategic Planning Consultations; Strategic Planning
Cc:
Subject: Representations to Preferred Options - Land off Green Road, Weston
Attachments: Representations_Weston_Final Draft_12122022.pdf

Dear Sir or Madam,

Representations to Local Plan 2020-2040 Preferred Options Document – Land off Green Road, Weston

On behalf of Richborough Estates, please find attached representations to the Local Plan 2020-2040 Preferred Options Document.

I would be grateful if you could confirm receipt of this email and the attachment.

Best wishes,
Georgina

Georgina Blackburn
Planner

 asterplanning.com





Response to the Stafford Borough Local Plan 2020-2040: Preferred Options

On behalf of Richborough Estates Ltd.

In relation to:
Land off Green Road, Weston

12th December 2022



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APPENDICES

APPENDIX 1 - Site Location Plan

APPENDIX 2 – Illustrative Masterplan

APPENDIX 3 – Meecebrook: Review of Passenger Rail Station Proposals

Prepared By: Jon Power (Associate Partner)

Asteer Planning LLP, [REDACTED]

Version Draft v3

Date: 6th December 2022

- 1.2 These Representations have been prepared by Richborough to provide comments on the vision, spatial strategy and key policies of the Preferred Options; and to demonstrate the availability, suitability and deliverability of the site at Green Road to provide a high-quality residential development as part of a balanced spatial strategy for Stafford.
- 1.3 The site represents a logical and appropriate extension to Weston and is highly sustainable, with a range of existing services and facilities located within close proximity to the site. The site can be sub-divided into phases based on the Council's housing requirements and provides an opportunity to deliver between 50 and 140 high quality family and affordable homes which would support the vitality, viability and vibrancy of Weston, which currently has no proposed housing allocations, and underpin a balanced spatial strategy that meets identified need across the Borough. It could deliver development that meets the highest standards of sustainable design, support enhancements in biodiversity and provide accessible, multifunctional community open space that includes a new Country Park and Canal Walk and will deliver significant benefits for existing and future residents.
- 1.4 This response is separated into two parts:

Part 1: Comments on the Preferred Options Local Plan & Evidence Base

- 1.5 Providing detailed comments on the Preferred Options Local Plan, including:
1. **The Development Strategy** – including the strategic direction of the Local Plan, the spatial strategy, settlement hierarchy and key strategic policies.
 2. **Strategic Allocations** – critically analysing the suitability and deliverability of the proposed strategic allocations at the Meecebrook Garden Community and the Stafford Station Gateway.
 3. **Site Allocations Policies** – providing overarching comments on the site allocations strategy.

Part 2: Land off Green Road, Weston: A Deliverable Site

- 1.6 Demonstrating the availability, suitability and deliverability of the site to provide high quality residential development as part of a balanced spatial strategy for Stafford; including:
1. **Site Context** - a summary of the site in context, including its wider strategic positioning and a description of the site and its surroundings;

2. **Planning Policy Context** - a review of the site within the context of the adopted and emerging Local Plan and the reasons why, in policy terms, the site should be considered for allocation;
 3. **Technical and Environmental Considerations** - analysis of the key technical and environmental considerations which will influence the development of the site, and which have informed the preparation of an Illustrative Masterplan.
 4. **Deliverability and Benefits** - a summary of the availability, suitability and achievability of developing site, and an articulation of the key benefits that the allocation of the site could deliver.
- 1.7 Richborough would welcome ongoing engagement with the Council as the preparation of the Local Plan is progressed and would be happy to discuss any feedback in relation to these representations or the site-specific material submitted as part of this response and the Call for Sites process.

Part 1: Comments on the Preferred Options Local Plan

1 BACKGROUND & INTRODUCTION

1.1 The Preferred Options consultation was published for comment on 24th October 2022 and contains a range of information, evidence and policy direction on which comment is invited, including:

- **The Preferred Options Local Plan** – which includes housing and employment land requirements, the broad spatial distribution of uses, proposed development allocations including strategic allocations at the Stafford Station Gateway and a new Garden Community at Meecebrook; and a range of draft planning policies on topics such as climate change, economic development, housing provision, transport and the environment; and
- **Evidence Base** - a range of new evidence base documents that support the emerging Local Plan’s spatial strategy, land allocations and detailed policies.

1.2 Part 1 of these Representations provide detailed comments on the Preferred Options and its supporting documentation, with particular reference to how it relates to Richborough’s site in Weston and its interrelationship with the wider Local Plan strategy and strategic context. These representations build upon previous submissions by Richborough that have sought to articulate the merits of the site in early Local Plan consultation, including:

- A response to the “Scoping the Issues” consultation – submitted in September 2018; and
- A response to the Issues and Options consultation – submitted in January 2020.

2 THE DEVELOPMENT STRATEGY

2.1 This section provides a response to the Preferred Options overarching Development Strategy, including the scale and distribution of development needs and the proposed settlement strategy.

Development Needs

2.2 **Policy 1 (Development Strategy)** of the Preferred Options sets out that between 2020 and 2040, provision will be made for 10,700 new homes (equating to 535 new dwellings per annum (“dpa”)) and 80 hectares of employment land.

2.3 Richborough recognise that the identified housing need encompasses an uplift from the standard method requirement (391dpa) to account for ‘jobs based’ growth (to 435dpa) and to accommodate 2,000 units to meet the unmet needs of neighbouring authorities (an additional 100dpa). However, Richborough consider that this target is not ambitious for a Borough with unique strategic opportunities, and which will have a generational opportunity for growth following the arrival of HS2.

2.4 Lichfields has prepared an Economic and Housing Development Needs Assessment (“EHDNA”) to underpin Stafford’s development needs and inform its development strategy. It considers 7 scenarios for housing growth, ranging from the Government’s Standard method (408dpa¹) to accelerated jobs growth scenarios (up to 746 dpa). The two highest growth scenarios are:

- **Scenario E (Jobs Growth Regeneration):** supporting a requirement of 646dpa (or 711dpa including PCU²) – this scenario considers the implications of a new Garden Community and Stafford Station Gateway with respect to the jobs these developments are expected to generate.
- **Scenario F (Past Trends Scenario):** supporting a requirement of 683dpa (or 746 dpa including PCU) – this scenario that assumes that the CAGR³ rate of jobs growth of 0.83% experienced between 2000 and 2018 is continued over the Plan Period.

2.5 Richborough considers that, as a minimum, the housing need should reflect a level of jobs growth that supports regeneration and the delivery of the major strategic allocations identified in the emerging Local Plan. However, we believe that jobs growth over and

¹ Government LHN in 2020, when the EHDNA was published

² Partial Catch Up

³ Compound Annual Growth Rate

above past trends could occur over the forthcoming Plan Period, based on the exceptional growth potential of the Borough and, therefore, a housing need of **746dpa or above** should be considered to support a truly transformational Local Plan. Richborough considers that there is a compelling case to advocate strongly for a more ambitious housing target based on the following:

a) Supporting the Exceptional Growth Potential of Stafford

2.6 Stafford has enormous potential to catalyse its growth during the forthcoming Plan Period. The emerging Local Plan is an opportunity to support this growth, which if missed, could stifle the economic potential of Stafford for the next 30 years. The potential of Stafford is driven by:

- Its accessibility, strategic transport links and key strategic location as an anchor location between the West Midlands and the North;
- Major employment growth, both in traditional and logistics opportunities across the Borough, and in the regeneration opportunities that exist at the Stafford Station Gateway (and beyond); and
- The arrival of HS2 in Stafford which will allow travel between Stafford and London Euston in just 55 minutes, and which presents huge opportunities for the town, not only in the Stafford Gateway area, but across the Borough. A failure to provide the type and quality of homes and infrastructure to support the arrival of HS2 would be a major missed opportunity to set the platform to catalyse the future growth of the Borough for the next generation.

2.7 The Constellation Partnership, an alliance of 7 Local Authorities across Staffordshire and Cheshire⁴, prepared a Growth Strategy in 2018 which sought to deliver transformational economic growth, supported by the arrival of HS2, with accelerated growth envisaged across the region by 2040. The overarching Growth Strategy of the Constellation Partnership sought to support the delivery of at least 120,000 new jobs, 100,000 new homes and £6 bn per year of Gross Value Added (“GVA”) by 2040⁵ across the partnership area.

2.8 The Constellation Partnership Growth Strategy advocates for ‘accelerated’ housing delivery, over and above existing trends, stating that the area should deliver “at least

⁴ Including Stafford, Staffordshire, Newcastle-under-Lyme, Stoke-on-Trent, Staffordshire Moorlands, Cheshire East and Cheshire West and Chester

⁵ Constellation Partnership Growth Strategy (October 2018)

100,000 new homes, by accelerating the delivery of the 77,000 homes identified within Local Plans, on a series of key strategic sites which align with our objective of securing 'good growth', ensuring that the supply of housing delivers a broad range of new homes that are affordable and accessible to people where they need or choose to be⁶.

- 2.9 In addition, the Stoke-on-Trent and Staffordshire Local Enterprise Partnership ("SSLEP") prepared a Strategic Economic Plan ("SEP") in 2014 (updated in 2018) which also recognises the enormous growth potential of the region, including Stafford – seeking to grow the economy in the region by 50%, generating 50,000 new jobs between 2011 and 2021. The 2020-21 SSLEP delivery plan confirms that this ambitious target has been achieved, underlining the huge growth potential of the region.
- 2.10 Moving forward, Stafford is identified as a strategic priority as a "competitive urban centre" where it is envisaged to create *"the right mix of places that are attractive destinations to live, work and visit, underpinned by the right infrastructure⁷".* The SSLEP fully recognises the role of new homes in supporting the growth potential of the region – where providing the type, mix and quality of new homes is critical in underpinning the diversity and scale of economic growth envisaged in Stafford. The SEP recognises this: *"Housing investment and delivery is vital to the economic prosperity of Stoke-on-Trent and Staffordshire. Supporting investment and infrastructure, including HS2, is critical to ensuring that the area really benefits from national investment⁸".*
- 2.11 Simply put, a failure to provide suitable land for housing growth in the Local Plan will be a missed opportunity to capitalise on the once-in-a-generation growth potential of Stafford during the next Plan Period. A more ambitious housing target would ensure that this growth is realised and will catalyse the Borough's economy during the next 20 years.

b) Past Rates of Delivery

- 2.12 The EHDNA identifies that an average of 587dpa were delivered between 2001/02 and 2018/19, which includes a period of significant housing recession and exceeds the current target in the emerging Local Plan. Notwithstanding this, past trends also indicate that:
- Between 2001/02 and 2008/09 (pre-recession) an average of 661dpa were delivered; and

⁶ Constellation Partnership Growth Strategy (October 2018), p26

⁷ SSLEP Deliver Plan, p8

⁸ SEP (2018), p26

- In the last 4 reporting years (2015/16 to 2018/19) an average of 815dpa were delivered.

2.13 These trends suggest that there is significant demand and the potential for Stafford to continue to deliver higher levels of housing to meet this need – particularly in the context of the potential for catalytic growth over the next 20 years.

c) Affordable Housing Need

2.14 The EHDNA identifies an affordable housing need in the range between 252 and 389 affordable homes per annum between 2020 to 2040 for the Borough, which represents a significant proportion of the local housing need based on the standard method (408 dpa) and would require at least a 36% delivery rate even if the Regeneration PCU scenario of 711 dpa were pursued.

2.15 In addition, median affordability ratios (both residence and workplace-based) have generally increased over time, indicating worsening affordability⁹. Lower quartile ratios in Stafford are worse than median ratios, indicating that those on lower incomes may struggle to afford even lower priced properties.

2.16 In summary, if insufficient new homes are provided to meet increasing demand, then there is a risk that affordability levels will worsen for the next generation of residents in the Borough, and create significant negative social and economic outcomes. We consider that the evidence exists to support a more significant uplift in overall housing need to better address affordability and the delivery of new affordable homes during the next Plan Period.

Summary

2.17 In summary, Richborough consider that there are compelling reasons why a much higher housing need should be considered, based on the growth potential of the Borough, its past and current rates of delivery / jobs growth and a worsening affordability crisis. As such, we contend that **an annual housing need in excess of 746dpa should be considered.**

⁹ EHDNA, p120

The Settlement Strategy & Spatial Distribution

Settlement Hierarchy

2.18 Policy 2 (Settlement Hierarchy) sets out the Preferred Options proposed settlement hierarchy. Richborough's comments on the proposed settlement hierarchy are as follows:

- **Tier 1 and Tier 2** - Richborough supports the identification of Stafford (Tier 1) and Stone (Tier 2) at the top of the settlement hierarchy, which is in line with Government policy and reflects the size, scale and function of these settlements.
- **Tier 3** - Richborough strongly objects to the identification of Meecebrook Garden Community ("Meecebrook") as a stand-alone settlement at Tier 3 of the hierarchy. For the reasons set out in Section 3 of Part 1 of these Representations, we consider that Meecebrook is fundamentally unsustainable, unviable and undeliverable and, therefore, should be removed from the settlement hierarchy altogether.
- **Tier 4** - Richborough strongly supports the identification of Weston as a 'larger settlement' which appropriately reflects its scale and importance as a key rural service centre in the Borough. However, as set out above, it is considered that larger settlements should form the 3rd tier of the settlement hierarchy.

Spatial Distribution

2.19 The Preferred Options identifies the spatial distribution of homes to meet its identified housing need across the Borough during the next Plan Period. Policy 1 (Development Strategy) sets out the broad distribution of housing supply across the Borough as follows:

- Stafford (59%).
- Meecebrook (24%).
- Stone (7%).
- Windfall (6%).
- Larger settlements (4%).
- Smaller settlements (<1%).
- Rural areas (<1%).

2.20 Just 4% of the Borough's housing supply is distributed to the 'larger settlements', such as Weston, which comprises 84 completions (between 2020 and 2022), 144 commitments

and only 234 units in new allocations. Richborough considers that the spatial strategy and the distribution of new housing presents an imbalance. Larger settlements have a higher capacity for growth and a more balanced spatial strategy should deliver a higher level of growth in the Borough's larger settlements, for the following reasons:

- **Reasonably assessing Weston's capacity for growth** – the Council's Interim Sustainability Appraisal ("SA"), prepared in 2022, considered reasonable alternatives for growth which considered the wider site and its full capacity for growth (a total of 361 units). However, the SA also considered the appropriateness of a more modest extension to the south of Green Road, stating that (Asteer **emphasis added**) *"There is a primary school at Weston, and the village benefits from good road connectivity in all directions, with Stafford town centre under 15 minutes by car or around 30 minutes by bus (although bus frequency is poor). The combined capacity of the two sites discussed above is in excess of the capacity of the primary school to accommodate growth (and it is noted that the school is located in the village centre, with seemingly little or no potential for expansion); however, a reduced capacity scheme at WES02 would likely not give rise to any issues, and could be appropriate to avoid undue expansion of the village to the south, along the river valley"*.

The Illustrative Masterplan options contained at Appendix 2 demonstrate how a modest expansion to the south of Green Road (showing development that could deliver a range of phased scheme options between 50 and 140 dwellings) could be sensitively delivered in Weston, and which should be considered as part of the Council's assessment of potential growth options. Richborough consider that delivering zero growth in Weston will stifle housing choice and fail to meet the needs of the next generation of residents. Options for a more modest, logical and natural extension of Weston, which delivers significant recreation and biodiversity enhancements, should be considered as a reasonable alternative in the SA and site selection process as a Regulation 19 version of the plan is prepared.

- **To support vitality, vibrancy and viability** – to support growth and vitality and viability of the Borough's service centres, new residents and additional growth is required that allows them to evolve, meet their potential and to support new residents during the next Plan Period. Providing zero growth in Weston could have an adverse impact on its vitality as a vibrant rural service centre and will not provide the housing and future residents that will support new infrastructure and the sustainable growth of the village.
- **Meeting needs** – Richborough consider that a higher distribution of housing to the Borough's larger settlements would better meet the needs of the Borough. There is a

need for more diversity and affordability in housing stock in the rural area (and outside of Stafford where viability is an issue) – which could be met by deliverable and viable sites that can deliver a mix of types and tenures of homes early in the Plan Period.

Summary

2.21 In summary, Richborough make the following overarching comments on the Preferred Options proposed Development Strategy:

1. Richborough consider that **there is a compelling case to adopt a more ambitious housing need target, of 746dpa or higher**, to deliver Local Plan that grasps the opportunity that the next Plan Period presents – supporting the exceptional potential for growth, reflecting the evidence of past trends and addressing affordability and affordable housing need;
2. Richborough **strongly objects to the identification of Meecebrook Garden Community as a stand-alone settlement at Tier 3 of the settlement hierarchy** – which is fundamentally unsustainable, unviable and undeliverable and, therefore, should be removed from the settlement hierarchy; and
3. Richborough supports the identification of Weston as a ‘larger settlement’ in the settlement hierarchy, however, there is an imbalance in the spatial strategy and the distribution of new housing. Richborough consider that **larger settlements have a higher capacity for growth** and should accommodate additional growth to support a more balanced spatial distribution of housing. Moreover, **providing zero growth in Weston will stifle housing choice and fail to meet the needs of the next generation** of residents.

3 STRATEGIC ALLOCATIONS

3.1 The Preferred Options proposes four major strategic site allocations, which will deliver 8,329 units, comprising:

- Meecebrook – 3,000 units;
- North of Stafford – 2,700 units;
- West of Stafford – 1,729 units; and
- Stafford Station Gateway – 900 units.

3.2 Richborough consider that there are significant question marks over the deliverability of these allocations, particularly the Meecebrook Garden Community and the residential elements of the Stafford Station Gateway. Our overarching comments on these proposed allocations are provided as follows:

Meecebrook Garden Community

3.3 Richborough **strongly objects to the selection of Meecebrook as a feasible, realistic or deliverable strategic site.** It represents an isolated greenfield development that has transformed from what was a partially brownfield development (on the site of the MOD Swynnerton Training Area) at the Issues and Options stage of the Local Plan, to an entirely greenfield development. Much of the SA's consideration of Meecebrook is predicated on the delivery of the extensive suite of infrastructure, not least a new rail station on the West Coast Mainline, which for the reasons set out in this response is neither feasible nor deliverable. As such, it is considered that the SA is flawed and should be revisited as the Regulation 19 stage of the Local Plan is prepared.

3.4 The following commentary sets out the key reasons why Meecebrook should be removed as an allocation and a more balanced spatial strategy, that directs additional growth into Stafford, Stone and the Borough's larger settlements, should be adopted.

Site Selection

3.5 Firstly, it is not clear how Meecebrook has been reduced/amended from a site with a large element of brownfield land (the MOD land) to a predominantly greenfield site – as the Local Plan has moved from Issues and Options stage to Preferred Options – without a full and transparent assessment of how this has impacted on the initial selection of the site. The change in the site parameters has also reduced the site capacity from 11,500 dwellings to 6,000 dwellings, which significantly undermines the case for major

infrastructure (such as the Rail Station) and reduces the significant benefits envisaged in the original Cold Meece 'Garden Village' proposals.

- 3.6 It appears that the main reason for the change in site area and strategy is land availability, with the SA stating that *"there are issues with regards to land availability, with extensive areas of land thought to be available at the time of the Issues and Options consultation (following a call for sites) now unavailable (specifically MOD land at Swynnerton Training Area, and farmland in the vicinity of Upper Heamies). This led the Council to undertake further work to explore land availability, following the Issues and Options consultation, which led to additional land being identified as available. The net effect is that the current site 'red line boundary' is shifted significantly to the west, in the direction of Eccleshall, relative to the assumed red line boundary at the time of the Issues and Options consultation¹⁰".*
- 3.7 The SA goes on to acknowledge the risks and uncertainties associated with a 6,000 home scheme, stating that (Asteer **emphasis** added) *"Within this adjusted red-line boundary there is capacity for at least 6,000 homes, at which scale there would be the potential to deliver a range of strategic infrastructure, likely to include a train station (detailed feasibility work has been completed, but **there remain risks and uncertainties**). However, a **6,000 home scheme could have drawbacks relative to a scheme of up to 11,500 homes, as previously envisaged¹¹".***
- 3.8 Richborough consider the assessment of the site in the SA and the site selection process to be fundamentally flawed, due to:
- No re-consideration of whether the site would be initially selected without brownfield land, or without initial Government funding to support a site that included the MOD land.
 - A predetermined approach in the SA that assumes that all infrastructure, including a rail station, will be delivered – despite the flagged risks and clear uncertainties. As set out below, we consider some of these elements of infrastructure, and therefore Meecebrook, to be undeliverable; and therefore a revision of the SA is required.
 - A lack of full consideration of the dis-benefits of amending the site area in terms of no longer utilising brownfield land (in line with Government policy) and the real impact on benefits in reducing from a garden village (11,500 homes) to a garden community.

¹⁰ Interim Sustainability Appraisal, p76

¹¹ Interim Sustainability Appraisal, p76

- 3.9 In summary, we consider that a pre-determined strategy, supported by initial Government funding, has led the Council to pursue Meecebrook; even as the initial benefits in terms of brownfield use and the scale of development, have been eroded.

Sustainability and Accessibility

- 3.10 Meecebrook represents an isolated and, without a new rail station, a wholly unsustainable location for growth. The SA fully recognises that in sustainability and accessibility terms, Meecebrook would not be deliverable without a new rail station on the West Coast Main Line, stating that (Asteer **emphasis** added): ***“should it be the case that delivery of a train station cannot be guaranteed, then the transport merits of the site decrease significantly. Staffordshire County Council stated clearly through the Issues and Options consultation (2020): A new Garden Community at Meecebrook would require a new rail station to prevent it from becoming a car dominated settlement¹².”*** It also states that *“without a train station then the ‘transport’ merits of a 6,000 home scheme in this location are questionable, as links to higher order settlements would be far less strong (also an unmet needs consideration)¹³”*.
- 3.11 Also, Meecebrook was previously considered to require a new Junction on the M6 to provide adequate access to the strategic highways network, with the Council’s Strategic Development Site Options (2019) stating that a potential infrastructure requirement of the site was “a new junction on M6 with link to site”. This requirement is not considered in the Preferred Options and it is unclear what impact Meecebrook would have on the local road network without a suitable and direct access to the strategic highways network.
- 3.12 As set out below, it is considered that a new rail station at Meecebrook is not deliverable and, therefore, the development of the site would lead to an isolated, car borne development that is neither accessible nor sustainable.

New Rail Station Feasibility

- 3.13 A review of the new passenger rail station proposals for Meecebrook has been undertaken by Intermodality, a specialist transport consultancy, which is provided at **Appendix 3** of these Representations. This review provides a critique of the rail feasibility work undertaken by the Council to date¹⁴, and draws conclusions on the overall feasibility of

¹² Interim Sustainability Appraisal, p61

¹³ Interim Sustainability Appraisal, p100

¹⁴ Including the Meecebrook Garden Community Transport Strategy, July 2020 (Atkins); Pre-Feasibility Report V0.1, March 2022 (SLC Rail); Feasibility Report v1.0, July 2022, updating work in the March 2022 report (SLC Rail).

delivering a new passenger rail station on the West Coast Main Line (“WCML”), which as set out previously, is critical to the delivery of a new Garden Community at Meecebrook.

3.14 Conclusions drawn by Intermodality identify significant issues and risks associated with the delivery of a new multi-platform rail station on the WCML, including:

- The intensity of current rail services on the WCML, the ‘Backbone of Britain’, the busiest mixed-use railway in Europe with a nationally-significant role for moving passengers and freight;
- A series of major upgrades to the WCML have been undertaken in recent years to improve capability and reduce journey times, including a major grade-separated junction at Norton Bridge, but without any provision being made in the previous or current strategy for any new station at Meecebrook;
- Engineering access on the WCML, which shuts either the fast or slow lines passing the site, would necessitate a 4-platform station to be constructed for network operational reasons, but which would not otherwise be justified commercially, adding substantially to the complexity, cost and risk of delivering the station, relative to the size of the adjacent development which would need to fund and sustain it;
- Current signalling not being suitable in capacity or location to accommodate a new station, and as such adding to the complexity, cost and risk of delivering the project, in terms of new and altered signalling;
- A new station would abstract demand and revenue from existing stations;
- The need for the entire development to be completed (which might not occur for another 30 years) in order to generate sufficient critical mass of demand, with no indication in the reports on how / who would cover the financial losses in the intervening period;
- The ability to fund and deliver rail enhancements in the current climate, with SLC noting recently the impact of the COVID19 pandemic and its long term impact on working practices and passenger demand;
- The conclusion from Atkins that, even if the station were to be delivered, the development would still generate considerable levels of highway trips, requiring further mitigation measures;
- The conclusion of SLC that the station business case would achieve a BCR of 1.5, at the low end of the range for “medium” value for money.

3.15 Notwithstanding the fact that these are significant issues that in isolation undermine the feasibility and deliverability of a new station, it is also apparent that there has been complete lack of early (or any) engagement with the rail industry, especially with Network Rail as the licenced, regulated manager of the national rail network. This fundamentally undermines the deliverability of a new station and there can be no confidence that a new station is achievable in terms of delivery, technical/engineering feasibility or value for money; and therefore the delivery of Meecebrook is neither feasible nor sustainable.

Deliverability

3.16 Notwithstanding that we consider a new rail station to be unfeasible, as set out above, which would render Meecebrook fundamentally undeliverable and unsustainable; there are also significant infrastructure and other obligations that would need to be delivered to support a sustainable and liveable new community. These include (but are not limited to):

- A secondary school, primary schools and nursery provision;
- A health care facility with GP, dentist and pharmacy;
- A flexible, multi-purpose building for use by the community;
- Community hubs / facilities;
- A place of worship;
- Indoor and outdoor sport provision;
- Off-site highways infrastructure upgrades necessary to mitigate the impact of the development on the highway network; and
- The creation of new habitats for biodiversity, public open space and play space.

3.17 The delivery of this infrastructure and the required affordable housing provision would present significant challenges to delivering a new community based on overall viability. The SA states that (Asteer **emphasis** added) ***“Delivery risk at Meecebrook is a consideration, with the Viability Assessment (2022) concluding (assuming 40% affordable housing): “Meecebrook is marginally viable. Further discussions and engagement are needed with the identified landowners to solidify a red line boundary and manage expectations”¹⁵.”*** The Council’s Viability Assessment (2022) states that for Meecebrook to

¹⁵ Interim Sustainability Appraisal, p67

viably deliver 40% affordable housing, it would “need to forgo the provision of all M4(2) and M4(3) accessible housing, Net Zero extra over interim FHS Interim Uplift and provision of electric vehicle charge points”. This would clearly be contrary to policy objectives and highlights the marginal viability of Meecebrook.

- 3.18 In addition, the site is in multiple landownerships and there are no agreements in place or clarity on the mechanisms for delivery. In terms of viability and deliverability, the Council’s Viability Assessment gives Meecebrook a red RAG rating, stating that (Asteer **emphasis added**) **“Meecebrook is constrained by the lack of clarity around landowner commitment and the unknown costs of infrastructure. It is important that landowners engage continuously in this process and further work is undertaken regarding infrastructure requirements. If landowners are not ‘on board’, or their financial expectations quantified, the delivery of this scheme is at risk¹⁶”**.

Delivery

- 3.19 Richborough consider that the Council’s Housing Trajectory for Meecebrook, at Appendix 6 of the Preferred Options, is wholly unrealistic. It assumes that the scheme will deliver 300 units per annum, starting from 2030/2031 – totalling 3,000 units over the last 10 years of the Plan Period. We consider this to be wholly unrealistic for the following reasons:
- A Framework Masterplan Supplementary Planning Document must be put in place to understand the infrastructure requirements, phasing and constraints to development; as well as setting the design and development principles that would frame the garden community. In our experience, this could take 1-2 years to be adopted following approval of the Local Plan – which could mean that an SPD is not in place until 2026/27.
 - Part L of Policy 7 (Meecebrook) states that *“development can only commence once a route to funding and delivery in line with the phasing set out in the Framework Masterplan Supplementary Planning Document has been identified for the railway station; primary and secondary schools; electricity, gas, clean and wastewater and on-site renewable energy systems; and any necessary strategic highways infrastructure upgrades”*. There is the potential for certainty in funding and delivery (notwithstanding that we consider the rail station to be undeliverable) to take a number of years, particularly given the complexity of delivering a new station on the West Coast Main Line; which will significantly impact on any lead-in times to development.

¹⁶ Viability Assessment (2022), p86

- Lichfields “Start-to-Finish” Report (2020) is a well-known industry barometer for understanding the lead in times to development. It estimates that sites of 2,000 units or more take an average of 8.4 years from the validation of the first planning application, to the delivery of the first dwelling. On this basis, if an application were validated now, it would be unlikely to be delivering homes in 2030/31 as set out in the Housing Trajectory.

3.20 Even taking the most optimistic scenario and assuming the new rail station is feasible, we consider that the delivery of Meecebrook would not be possible before the late 2030’s, based on:

- Local Plan adoption – end 2024 (LDS).
- Adoption / endorsement of the Meecebrook SPD – 2026/27.
- Possible timescale for clarity on rail funding and delivery – 2031/32 (c. 6 years post-adoption), followed by a significant lead-in to construction and delivery (realistically, this would be significantly longer, based on the lack of engagement with Network Rail).
- Validation of first application – 2031/32
- Delivery of first home – 2039/40.

3.21 Based on the above, even if Meecebrook is feasible and deliverable (which we do not consider to be the case), it is very unlikely to be delivering any units until the end of the Plan Period.

Environmental Impacts

3.22 Notwithstanding the fundamental issues with the feasibility and deliverability of Meecebrook, it also has the potential to have a significant environmental impact, due to the scale of development in a greenfield location which is isolated and has inherent environmental and physical constraints. These impacts have not yet been fully assessed or understood, but the Council’s evidence base does acknowledge significant constraints that the delivery of Meecebrook would need to address – particularly due to the site area switching from a brownfield to greenfield development. Key issues include:

- **Biodiversity** – the Council’s SA recognises the potential for the development of Meecebrook to impact on designed habitats, which has increased since the site boundary has been amended, noting that: *“there are wide-ranging considerations in respect of locally designated habitats (Sites of Biological Importance, SBIs) and non-*

designated 'priority habitats' (a national dataset is available, but is somewhat dated and low accuracy). This largely relates to the fact that development would be focused on the Meece Brook corridor, and the effect of shifting the site red-line boundary to the west and to the south, since the Issues and Options stage, is potentially to modestly increase the concern regarding impacts to the Meece Brook SBI..... the effect of moving the site boundary to the west is to increase concern regarding impacts to the sensitive Mill Meece area (specifically land west of the village of Millmeece, and west of the railway line).¹⁷"

- **Heritage** – the Council's Strategic Development Site Options (2019) note that Meecebrook contains a number of listed buildings which would require their setting to be protected and enhanced. At this stage, there is limited information or assessment that considers the impact on historic assets, or how they would be fully protected and preserved.
- **Landscape impact** – the Council's 2021 Landscape Sensitivity Study, considered Meecebrook, but assessed the site which included the MOD land, which was considered to be less sensitive in landscape terms. The SA states that (Asteer **emphasis added**) "*study was completed in 2021 to evaluate landscape sensitivity, which concluded 'medium' sensitivity overall. However, the study examined the site previously under consideration for 11,500 homes, to include the MOD land, which has relatively low landscape sensitivity. **Most of the land examined in 2021 that falls within the current site boundary was found to have 'medium / high' sensitivity overall***¹⁸". This again demonstrates how the evidence base does not support the amended Meecebrook boundary, which will have significant biodiversity and landscape impacts. The development of the site also potentially risks coalescence between Yarnfield, Coldmeece and Sturbridge.

3.23 Overall, there is limited evidence base assessment work that has been undertaken to underpin or justify the Meecebrook allocation – particularly now the site boundary has been fundamentally altered to exclude the MOD land. Richborough consider that the site is likely to have very significant environmental impacts, when compared to alternative growth options.

¹⁷ Interim Sustainability Appraisal (2022), p46

¹⁸ Interim Sustainability Appraisal (2022), p94

Stafford Station Gateway

3.24 Whilst Richborough supports the delivery of the Stafford Station Gateway, as a predominantly brownfield site in a highly accessible location, there are concerns over the viability and deliverability of the proposed residential elements of the scheme. Our key concerns relate to:

- **Viability** – it is considered that further work is required to understand the viability of the Stafford Station Gateway, which is considered to be marginal. The SA states that (Asteer **emphasis added**) *“the range of issues and constraints affecting Stafford Station Gateway could indicate that affordable housing delivery may prove challenging. The Viability Study (2022) assumes 20% affordable housing, and concludes: **Station Gateway is marginally viable. The large number of landowners may lead to complexities with collaboration and equalisation agreements which puts the site at risk**¹⁹.”* In addition, the Council’s Viability Assessment gives Stafford Station Gateway a red RAG rating, stating that *“Station Gateway is constrained by the lack of clarity around infrastructure. It is important that further work is undertaken regarding infrastructure requirements so that we may accurately model the implication on viability²⁰”*.
- **Land Assembly** – as touched upon above, there is significant uncertainty around the complexity of landownerships in the gateway area. Land assembly and CPO would have a significant impact, not only on viability, but on the lead-in times and assumed rates of delivery.
- **Delivery** – we consider that the Council’s Housing Trajectory for the Station Gateway, at Appendix 6 of the Preferred Options, is challenging. It assumes that units will be delivered on the site in 2028/2029 – just 3-4 years following the adoption of the Local Plan. Based on Lichfields “Start-to-Finish” Report (2020), sites of 500 units or more take an average of 5.0-8.4 years from the validation of the first planning application, to the delivery of the first dwelling. Factoring in the preparation of an application (and assuming that land ownership issues are resolved), this means that it is unlikely that any homes could be delivered before 2030/31 – 6 years post-adoption – in a best case scenario.

¹⁹ Interim Sustainability Appraisal (2022), p57

²⁰ Viability Assessment (2022), p86

Summary

- 3.25 In summary **Richborough strongly objects to the identification and allocation of Meecebrook as a strategic site** – which has been selected based on a pre-determined site selection process; and which is fundamentally unsustainable, inaccessible and undeliverable. **Richborough also has some concerns over the viability and deliverability of the residential elements of the Stafford Station Gateway**, which has significant issues with land ownership and viability.
- 3.26 Richborough considers that a more balanced spatial strategy could be achieved by removing the Meecebrook strategic allocation and delivering dispersed and sustainable growth across the Borough's larger settlements. A further assessment of the viability and deliverability of the Stafford Station Gateway proposals should be undertaken to confirm the level of development assumed can indeed be delivered within the time period envisaged.

4 SITE SELECTION & ALLOCATIONS

4.1 The Council sets out its site selection process, which underpins the Preferred Options draft site allocations, in the following evidence base documents:

- Site Selection Topic Paper (October 2022);
- Site Assessment Profiles (October 2022);
- Strategic Housing and Employment Land Availability Assessment (August 2022); and
- Stafford Borough Local Plan Interim Sustainability Appraisal (October 2022).

4.2 These Representations draw on these documents to make comment on the proposed site allocations and the site selection process – as it relates to Weston and, in particular, Richborough’s site at Green Road which comprises WES03 (Land south of Green Road) and WES02 (Land south west of the A51).

Site Selection Methodology

4.3 The Council’s Site Selection Topic Paper sets out that 290 sites were assessed, based on the following methodology²¹:

- *Stage 1: Sites with constraints rendering them non developable were rejected. If possible, site boundaries were adjusted to exclude constraints. 217 sites progressed to stage 2.*
- *Stage 2: Sites not within or adjacent to a settlement identified in the settlement hierarchy were rejected. 156 sites progressed to stage 3.*
- *Stage 3: Potential dwelling yield for each site is calculated, and site information is sent to external consultants and other consultees to form part of the local plan evidence base.*
- *Stage 4: Evidence-based decision to select or reject sites. 57 sites progressed beyond this stage.*

²¹ Site Selection Topic Paper (October 2022), p4

Site Assessment: WES03 (Land south of Green Road) and WES02 (Land south west of the A51)

- 4.4 Firstly, these sites are both under the control of Richborough and should be considered together as a single site.
- 4.5 The Council Site Assessment Profiles (2022), which support the Preferred Options, list the sites which passed Stage 2 of the site assessment process. Both sites WES02 and WES03 are concluded to be a 'Potential Site Option'. Whilst the assessment considered a much larger allocation (in terms of capacity) than is being promoted by Richborough, it does not identify any constraints to the development of the site that could not be mitigated, which is considered further in Part 2 of these Representations. Furthermore, the site was considered to be available, suitable and achievable in the Council's Strategic Housing and Employment Land Availability Assessment ("SHELAA"), concluding that *"the site is potentially developable based on the compliance with Policy C5 of the Local Plan and Paragraph 72 of the NPPF²²"*.

Site Selection Process

- 4.6 As set out above the site has been considered as a potential site option with limited constraints to its delivery. However, it is unclear, based on the published evidence base, why the site was ultimately excluded or discounted.
- 4.7 The Council's Interim Sustainability Appraisal consider the 'Site Options' and 'Site Settlement Scenarios' in Sections 5.3 and 5.4 of the SA respectively. In Paragraph 5.3.4 of Section 5.3 the SA states that of the 57 sites that progressed beyond Stage 4, all were *"given detailed consideration within: the SBC Site Assessment Profiles document; the SBC Site Selection Topic Paper; and Section 5.4"*.
- 4.8 Section 5.3 of the Council's SA considers the 'Site Options'. It identifies WES02 and WES03 as "short-listed: housing or mixed use sites", with and the table at Page 104 of Appendix V of the SA identifying the site as "being progressed beyond Stage 4" of the site selection process (i.e. one of the 57 sites). Following this, it is unclear why specifically the site was discounted following this stage. Section 5.4 of the report goes on to assess settlement scenarios and includes only two scenarios for Weston:
- **Scenario 1:** zero homes (Current Preferred Option); and

²² SHELAA (August 2022), p35

- **Scenario 2:** 175 homes (comprising part of WES02 and WES03).

4.9 The scenario for growth was not ultimately taken forward for Weston, with other scenarios in the Preferred Options taken forward – resulting in zero growth for Weston. However, as set out earlier, the SA does consider that a reduced capacity scheme to the south of Weston could be considered acceptable, stating that *“a reduced capacity scheme at WES02 would likely not give rise to any issues, and could be appropriate to avoid undue expansion of the village to the south, along the river valley²³”*.

4.10 In summary, Richborough consider that:

- For the reasons set out earlier in these representations, a zero growth option will have a significant impact on the vitality of Weston during the next Plan Period; and
- The SA and preparation of the Regulation 19 Plan should consider a reduced capacity scheme for WES02 and WES03 – as illustrated in the options presented at Appendix 2 of these Representations, which could deliver between 50 and 140 new homes as part of a modest and logical extension to Weston that will provide housing choice and deliver significant recreation and biodiversity enhancements.

Summary

4.11 In summary, Richborough would make the following comments in relation to the site allocations and site selection process as it relates to Weston:

1. Land **south of Green Road (WES02 and WES03) is entirely under the control of Richborough, has limited constraints that cannot be mitigated and is considered to be available, suitable and achievable** in the Council’s SHELAA;
2. For the reasons set out earlier in these representations, **a zero growth option will have a significant impact on the vitality of Weston during the next Plan Period;**
3. The SA does not consider a reduced capacity scheme in Weston, which it concludes could ultimately be appropriate. As such, **the SA and preparation of the Regulation 19 Plan should consider a reduced capacity scheme for WES02 and WES03** – as illustrated in the options presented at Appendix 2 of these Representations, which could deliver between 50 and 140 new homes as part of a modest and logical

²³ Sustainability Appraisal, Appendix VI, p121

extension to Weston that will provide housing choice and deliver significant recreation and biodiversity enhancements.

- 4.12 On the basis of the above and the information contained in these Representations, Richborough consider that further land should be allocated in the Borough's larger settlements. As such, Richborough respectfully requests that **a reduced capacity scheme should be considered on land to the south of Green Road in Weston as the next stage of the Local Plan is prepared.**

Part 2: Land at South of Green Road, Weston: A Deliverable Site

1 THE SITE IN CONTEXT

- 1.1 The site forms a natural and logical extension to the south of Weston, approximately 5km to the east of Stafford. The site has direct access to the existing strategic road network and provides an excellent opportunity to deliver a balanced pattern of development that will contribute positively to achieving the emerging Local Plan's strategic objectives by meeting local needs, supporting the organic growth of Weston and contributing positively to the vibrancy and vitality of the village.

Strategic Context

- 1.2 Stafford Borough is strategically located at the heart of the Stoke-Staffordshire region and is exceptionally well positioned to be at the heart of wider regional growth. It has excellent highways and rail connectivity and has inherent physical and economic links to the North West and West Midlands regions, with close geographical accessibility to Stoke-on-Trent, South Cheshire and Staffordshire.
- 1.3 The Borough's geography, coupled with its excellent road and rail links, means that it is exceptionally well positioned to act as a catalyst for wider regional growth, which capitalises on its locational advantage and will be further bolstered by HS2, which will allow travel between Stafford and London Euston in just 55 minutes.
- 1.4 The arrival of HS2 in Stafford presents huge opportunities across the Borough. Providing the type and quality of homes and infrastructure to support the arrival of HS2 will set the platform to catalyse the future growth of the Borough for the next generation. These opportunities are recognised by the Constellation Partnership Growth Strategy and the SSLEP, which envisages the arrival of HS2 to support the delivery of at least 120,000 new jobs, 100,000 new homes and £6 bn per year of Gross Value Added ("GVA") by 2040.
- 1.5 There is a clear opportunity for the Borough to grow during the next Plan Period; supported by its strategic location, excellent connectivity and its generational growth catalysts, such as HS2. It is fundamental that this growth is underpinned by the type and quality of housing and infrastructure that will realise its potential, supporting the growth of Stafford by delivering a balanced spatial strategy that meets need and provides housing choice across the whole Borough.

The Site & Surroundings

- 1.6 The site itself extends to some 12.81 hectares of agricultural land to the south of Green Road, Weston. It has a frontage of approximately 95 metres to Green Road which lies to the north. To the west is recently built housing development which extends along Salt Works Lane and frames the residential character of the area. To the north west of the site

is Weston Village Hall, which borders Salt Works Lane and Green Road. The southern edge of the site is bounded by a defined field edge and the Trent and Mersey Canal. The east of the site is defined by the A51 strategic highway.

Accessibility

- 1.7 The site is in a an accessible and sustainable location, within walking distance of a number of existing services and facilities that are accessible to the site in Weston. In terms of services, St Andrews C of E Primary School is located approximately 200m to the north of the site, whilst Weston also benefits from two public houses, a village hall and a church.
- 1.8 In terms of public transport, a number of bus services serve Weston, with stops being located at Old School Close and The Green. There are frequent services to Stafford and Uttoxeter, which include routes to other villages such as Hixon and Great Haywood, which have additional services such as GP practices. The Weston Road Academy (high school) is easily accessible by bus as are a range of sport and recreational facilities including swimming pools. Stafford and Uttoxeter also have rail services linking to major cities across the UK. Stafford station provides regular services to Manchester, Liverpool, Bristol, Birmingham, and to intermediate stations.
- 1.9 In summary, the site is accessibly located, with good transport connectivity that can utilise a range of modes of transport. The site is uniquely positioned to provide new homes that will strengthen the vibrancy and vitality of Weston, contributing positively to the creation of a strong local economy and providing new homes that benefit from good accessibility.

2 PLANNING POLICY POSITION

- 2.1 The emerging Stafford Local Plan offers an opportunity for the Borough to plan its future growth in locations that are sustainable and which complement a spatial strategy that directs need to the locations where is required. Weston is identified as being a 'Larger Settlement' and is third in the settlement hierarchy to only Stafford and Stone in the emerging Local Plan settlement hierarchy; presenting an appropriate location for sustainable growth to support a balanced spatial strategy.

Adopted Development Plan

- 2.2 The current Development Plan for Stafford Borough includes the Plan for Stafford Borough (adopted in June 2014) and the Plan for Stafford Borough - Part 2 (adopted in January 2017). Richborough supports a full review of the Local Plan to deliver an updated Development Plan that can appropriately plan for the long term spatial growth and identified needs of the Borough.
- 2.3 The site is within the Open Countryside in the adopted Development Plan. The Trent and Mersey Canal Conservation Area bounds the south-western extent of the site and, bounding the southern edge of the site is the Shirleywich Site of Biological Importance ("SBI").

The Case for Allocation

- 2.4 The site presents an excellent opportunity for sustainable development via a logical and natural extension to Weston and, therefore, there is a strong case for the allocation and subsequent development of the site during the next Plan Period. The site offers the potential to deliver a sensitive development that delivers a sustainable level of growth in Weston as a Tier 3 'larger settlement' in the emerging Local Plan. The remainder of this section provides a summary of the reasons why, in policy terms, there is a case for allocating the site for residential development.

Supporting a Balanced Spatial Strategy

- 2.5 At present, Richborough considers that there is an imbalance in the spatial strategy and the distribution of new housing - where larger settlements have a higher capacity for growth than is currently identified in the Preferred Options. A strategy that delivers zero growth in Weston will stifle housing choice and fail to meet the needs of the next generation of residents. Options for a more modest, logical and natural extension of Weston, which delivers significant recreation and biodiversity enhancements, would support a more balanced and sustainable strategy, when considered against unsustainable and fundamentally undeliverable options, such as Meecebrook.

A Logical & Sensitive Extension to Weston

- 2.6 The site is well located in terms of its functional relationship with the 'larger settlement' of Weston, forming a natural extension to the village, being partially bounded by existing residential development and further contained by the boundaries of the canal and the A51. The site has also been demonstrated to be sustainable in terms of its proximity to existing services and facilities, with public transport providing links to further facilities and services. It also provides opportunity to provide substantial amounts of open space. The site would therefore be well placed to ensure that future residents would have access to a diverse range of services and facilities, representing an opportunity to deliver a cohesive, sustainable development that acts as a natural and logical extension to Weston.
- 2.7 The Masterplan Options contained in Appendix 2 demonstrate how a modest expansion from Green Road would allow the development of a new Country Park and a significant area of multi-functional Green Infrastructure to be put in place, that provide a green buffer between the site and the wider open countryside and southern SBI; as well as providing a sensitive interface and increased access to the Trent and Mersey Canal Conservation Area corridor.

Meeting Housing Needs

- 2.8 As set out earlier in these representations, Richborough consider that there is a compelling case to adopt a more ambitious housing need target, of 746dpa or higher, to deliver Local Plan that grasps the opportunity that the next Plan Period presents – supporting the exceptional potential for growth, reflecting the evidence of past trends and addressing affordability and affordable housing need. The site provides an opportunity to support a balanced spatial strategy that meets the local needs of Weston during the next Plan Period.

Providing Housing Quality, Mix and a Diversity of Homes

- 2.9 It is critical that the Council provides not only the quantum of housing to meet its needs; but the mix, type and quality of housing in the locations that will support the growth of the Borough. In this context, it is particularly crucial to provide the type and quality of housing in locations that will support the Borough's rural service centres and ensure that housing choice is provided for the next generation during the Plan Period.

Affordable Housing and Supporting Affordability

- 2.10 The EHDNA has identified significant affordability issues in the Borough (with demand exceeding supply) and a need for between 252 and 389 affordable homes per annum between 2020 to 2040. The site has the potential to support the delivery of affordable

homes in a sustainable urban location, which will support the Council's supply of affordable housing during the Plan Period.

A Developable and Deliverable Site

- 2.11 As demonstrated in the following section, the site does not have any technical or environmental constraints that could not be mitigated, subject to further assessment work, which would prevent a sensitive residential development being brought forward at the site.

Summary

- 2.12 In summary, there is a strong case for the allocation of the site in the emerging Local Plan. The allocation of the site could support an appropriate spatial strategy that reflects the role of the Borough's larger settlements and deliver a sensitive development that meets the needs of Weston whilst respecting the scale and character of the village. The following section considers the specific technical and environmental considerations that will influence the development of the site.

3 TECHNICAL AND ENVIRONMENTAL CONSIDERATIONS

- 3.1 Two Illustrative Masterplan options have been prepared to reflect the characteristics of the site, underpinned by detailed technical analysis that has considered site opportunities and constraints. It has demonstrated that a development could be sensitively brought forward that responds to scale of Weston village and respects the historic and biodiversity assets that characterise the southern extent of the site.
- 3.2 This section sets out our understanding of the environmental and technical considerations, and serves as a framework for more detailed design and technical assessment work as the Local Plan is progressed towards Regulation 19 stage. Two Illustrative Masterplan options, that could deliver between 50 and 140 dwellings as a logical and natural extension to Weston are provided at **Appendix 2**.

Access

- 3.3 Vehicular access would be taken from Green Road to the north, with secondary access available from Salt Works Lane to the west. Pedestrian and vehicular access to the site from Green Road provides a logical, natural and technically appropriate solution to accessing the wider site. There are number of potential pedestrian points of access to the site that capitalise on the connectivity of the site and seek to improve access to the proposed Country Park and Canalside Walk to the south.

Flood Risk & Drainage

- 3.4 The site is entirely located in Flood Zone 1 which has the lowest risk of flooding (defined as land as having less than 1 in 1000 years' annual probability of flooding).
- 3.5 Any surface water drainage from the development will be fully assessed and could be adequately managed via Sustainable Urban Drainage Systems ("SuDS"). In summary, it is not considered that, with suitable mitigation, there are any flood risk or drainage constraints preventing the site being brought forward for residential development.

Landscape

- 3.6 The site is not identified as a Site of Special Scientific Interest ("SSSI"), and is not within an Area of Outstanding Natural Beauty ("AONB") or Special Area of Conservation ("SAC"). The Shirleywich Site of Biological Importance ("SBI") is located to the south of the site.
- 3.7 The Illustrative Masterplan options at Appendix 2 demonstrate how the delivery of an effective and sensitive landscaping scheme at the site would ensure that a proposed housing development would be landscape-led and reflect the character of the village; whilst providing an appropriate and sensitive design response to the surrounding

ecological and heritage assets, whilst being visually attractive and providing screening to the adjacent residential properties. The proposed Country Park and incorporation of significant multifunctional greenspace will enhance the accessibility, biodiversity and usability of the site – providing improved access to key assets, such as the canal corridor Conservation Area, for existing and future residents

- 3.8 Further detailed and updated landscape and visual assessment work can be undertaken, where required, as the Local Plan is progressed.

Heritage & Archaeology

- 3.9 As discussed previously, the south western boundary of the site abuts the Trent & Mersey Canal Conservation Area. The design response to the site fully respects the character of the Conservation Area and seeks to enhance its accessibility, usability and ultimately the enjoyment of the heritage asset by opening up a more accessible canal side walk. The closest listed building is located approximately 400m to the north west of the site, to the south of Stafford Road.
- 3.10 As such, it is not considered that there are any heritage constraints that would prevent the site being brought forward for development, subject to sensitive design that respects the character of the surrounding area and the setting of the Conservation Area.

Ground Conditions

- 3.11 The site is largely flat in terms of site levels and there are no topographical constraints to it being brought forward for development.
- 3.12 A Phase 1 site investigation assessment will be undertaken in due course; however, due the longstanding agricultural use of the site it is not anticipated that, subject to further intrusive assessment at the detailed design stage and suitable mitigation, that there are any significant constraints to development with respect to contamination or ground conditions.

Ecology and Trees

Ecology

- 3.13 As discussed, the Shirleywich Site of Biological Importance (“SBI”) is located to the south of the site. However, the proposed design response ensures that the development of the site will fully respect the siting of the SBI and, conversely, provide an opportunity to deliver a significant enhancement in the biodiversity value of the southern extent of the site, through the delivery of a new Country Park and through ecological enhancement.

- 3.14 It is not considered that there are any ecological constraints that would prevent the site from being developed for housing. However, a suite of ecological surveys will be undertaken at the site as the Local Plan progresses and any necessary mitigation will be incorporated into the scheme. It is anticipated that the site will deliver a Biodiversity Net Gain in accordance with emerging Government legislation – with an opportunity to deliver BNG significantly in excess of 10% based on a landscape / biodiversity led design response.

Trees

- 3.15 There are some Tree Preservation Orders located along the boundary of the site, which would be retained and incorporated into any future development.

Utilities & Infrastructure

- 3.16 The site is adjacent to the settlement boundary and immediately adjacent to the existing Weston residential area – and, therefore, it is anticipated that appropriate services including electricity, water and broadband will be available.
- 3.17 As more detailed plans for the site are developed, and as the Local Plan is progressed, more detailed technical work will be undertaken to assess the utilities capacity of the proposed development. However, it is not anticipated that there are any significant utilities infrastructure constraints that would prevent the site from coming forward for development.

Public Rights of Way

- 3.18 There are no Public Rights of Way (“PROW”) that cross the site. However, improved pedestrian access into and across the site will improve access to the proposed Country Park and Canalside Walk to the south, and to new residential areas to the west.

Air Quality & Noise

- 3.19 The site is not within an Air Quality Management Area (“AQMA”) and there are not anticipated to be any air quality constraints that would prevent the site being brought forward for development. The site is also not within proximity to any significant noise receptors that could not be treated with mitigation.
- 3.20 Further noise and air quality assessment work will be undertaken as detailed plans for the site are developed; however, there are not considered to be any air quality or noise constraints that would prevent the development of the site for residential use.

Agricultural Land

- 3.21 The site is in agricultural use and the Agricultural Land Classification (“ALC”) Map for the West Midlands Region (ALC004) suggests that the site is Grade 3 agricultural land – classified as ‘Good to Moderate’. A more detailed assessment of the agricultural land quality would be undertaken as detailed plans are progressed; however, it is not considered that the agricultural quality of the land would prevent the site being brought forward for development.

Sustainability & Energy

- 3.22 The emerging Local Plan and Preferred Options propose a strategic focus on mitigating the impact of climate change. The Local Plan vision seeks to *“Contribute to Stafford Borough being net zero carbon by ensuring that development mitigates and adapts to climate change and is future proof”*. Policy 4 of the Preferred Options seeks to promote a net zero operational target for residential development and requires new proposals to demonstrate that all resources are used efficiently, as part of the construction and operation of new buildings - with all major developments demonstrating how embodied emissions have been taken into consideration through the production of an embodied carbon assessment. In addition, the Council declared a Climate Emergency in July 2019, seeking to achieve carbon neutrality by 2040.
- 3.23 Richborough is committed to responding proactively and robustly in addressing and mitigating the adverse impacts of climate change and is fully supportive of the UK Government’s targets for reductions in greenhouse gas emissions. Richborough will seek to design a development that has holistic low energy, passive design concepts involving a fabric first approach and high emphasis on energy efficiency. The proposed development would seek to achieve a status of low carbon, carbon neutral and zero carbon ready by design status by obtaining energy from renewable sources and paying close attention to reducing its potential embodied carbon to the highest extent possible.

Summary

- 3.24 In summary, technical work has been commissioned to understand the site constraints and opportunities and support the merits of the site during the Local Plan process. This has been used to inform the design evolution and underpin a deliverable masterplan for the site, which demonstrates how a landscape-led scheme for residential uses could be brought forward.
- 3.25 Richborough is committed to undertaking further design and technical work to support the promotion and consideration of the site as the emerging Local Plan is progressed.

4 DELIVERABILITY & BENEFITS

- 4.1 The Illustrative Masterplan options at **Appendix 2** demonstrate how land south of Green Road, Weston could bring forward a logical natural and landscape-led extension to the village that could deliver between 50 and 140 homes, based on identified need and an assessment of options; and deliver a range of economic, social and environmental benefits on a site that will support a balanced spatial strategy and underpin the vitality and vibrancy of Weston.
- 4.2 The site is in an accessible location that will support a sustainable pattern of development that delivers a spatial strategy that meets need, early in the Plan Period, across the Borough. This section provides a summary of the deliverability of the site and an assessment of the key benefits that allocating the site for development would bring to Weston.

A Deliverable Site

- 4.3 The NPPF seeks to ensure that deliverable sites are provided in appropriate locations to meet housing needs and support economic growth. To be considered deliverable, sites should be available, suitable and achievable and should be available to be brought forward within a realistic timeframe once the Local Plan is adopted.
- 4.4 Richborough is fully committed to the site and consider that it could be brought forward immediately on adoption of the Local Plan to meet the housing needs of the Borough. In summary the site is:
- **Available** – Richborough has entered into an agreement with the landowner to promote the site for residential development. Richborough has a proven track record of facilitating the delivery of high-quality housing developments on suitable and sustainable sites and can confirm that the site can be delivered for housing within the early phases of the Local Plan period. Richborough are strong advocates of a plan-led system and are committed to promoting land for residential development by engaging actively with local authorities, parish councils and other neighbourhood forums through local and neighbourhood plans.
 - **Suitable** - the site is entirely suitable for a residential development for the following reasons:
 - It offers an accessible and sustainable location for development that would support a balanced spatial strategy and which could be brought forward early in the Plan Period following any allocation.

- It is a logical and natural extension to Weston that is not within the Green Belt.
 - There are no environmental or technical constraints that are considered to prevent the development of the site, subject to suitable mitigation and a sensitive, landscape-led approach to design.
 - It can deliver satisfactory vehicular access and has access to the strategic highway network via Green Road, with an emergency access via Salt Works Lane.
- **Achievable** – the Illustrative Masterplan options demonstrate how the site could respond to its physical characteristics, technical considerations and surrounding context by providing a sensitive landscape-led scheme. An assessment of the site constraints illustrates that delivery of the entire site is achievable, and a professional team of technical experts will support the detailed design of the site moving forward. Where any potential constraints have been identified, Richborough has considered the necessary mitigation measures and required investment in order to overcome any deliverability barriers. Richborough has reviewed the economic viability of different schemes in terms of the land value, attractiveness of the locality, level of potential market demand and projected rate of sales in Weston; as well as the cost factors associated with the site including site preparation costs and site constraints. In addition, Richborough has extensive experience working with nationally significant development partners. Developer partners who have built out Richborough sites include Bellway, Barratt David Wilson, CALA, Miller, Mulberry, Kier, Lion Court, Taylor Wimpey and Vistry. On Richborough’s sites, the average completion rate per sales outlet is a combined rate of 50 dpa for both market and affordable housing provision. Richborough confirms that the development of the site is economically viable, deliverable and achievable in accordance with the NPPF.

Key Benefits

- 4.5 The allocation of the site will support new housing in an appropriate location and ensure that a quantity, quality and mix is provided to support the economic growth of Stafford Borough. The delivery of the site will provide significant benefits to the Borough and to Weston. These are summarised as follows:

Economic Benefits

- 4.6 The development of the site will have significant economic benefits, both from its construction and occupation. Key economic benefits will include:

- Generating investment during the construction phase of development through construction cost, FTE construction jobs and an increase in GVA.
- Providing long term occupational / operational benefits including new resident expenditure, attracting new residents to SBC, generating flow on and supported jobs and, overall, generating increased economic output in the Borough.
- Generating significant revenue for the Local Authority, with a development of new homes generating revenue in Council Tax revenue, New Homes Bonus and through Section 106 contributions.
- Underpinning the catalytic growth opportunities in Stafford by providing the type, quality and spatial distribution of homes in Stafford that will allow the Borough to capitalise on its locational advantages and the arrival of HS2.

Social Benefits

4.7 The delivery of the site will have clear social benefits for existing and future residents, in terms of providing better choice, improving access to amenities and meeting a variety of identified housing needs. The key social benefits include:

- Delivering high quality market homes to meet the needs of the Borough's existing and future employees, supporting the future growth of the Borough.
- Providing viable and deliverable affordable homes to address the Borough's affordability crisis and support the housing of key workers and other first-time buyers. The site will provide, at a minimum, a policy compliant level of affordable housing.
- Delivering new and accessible multifunctional open spaces, amenity spaces and green infrastructure to benefit existing and future residents.
- A new 'Country Park' and Canalside walk that will provide accessible multifunctional space that will provide significant recreational benefits for the existing and future community.

Environmental Benefits

4.8 The development of the site has the potential to uplift the biodiversity, accessibility and overall enjoyment and environmental value of the site. In addition, the site has the potential to be an exemplar in sustainable design and construction. Key environmental benefits include:

- The site will create new habitats for a range of species and will seek to provide significant biodiversity net gain on-site (in excess of Government targets), through the development of a new Country Park and the incorporation of measures for ecological enhancement.
- The provision of multi-functional green infrastructure and open space that will generate significant recreational benefits for existing and prospective residents, including a new Country Park that will benefit the entire village.
- The protection and enhancement of existing features within the site that add value, including TPOs, mature trees and hedgerows.
- The promotion of and commitment to net zero technologies by Richborough.

SUMMARY

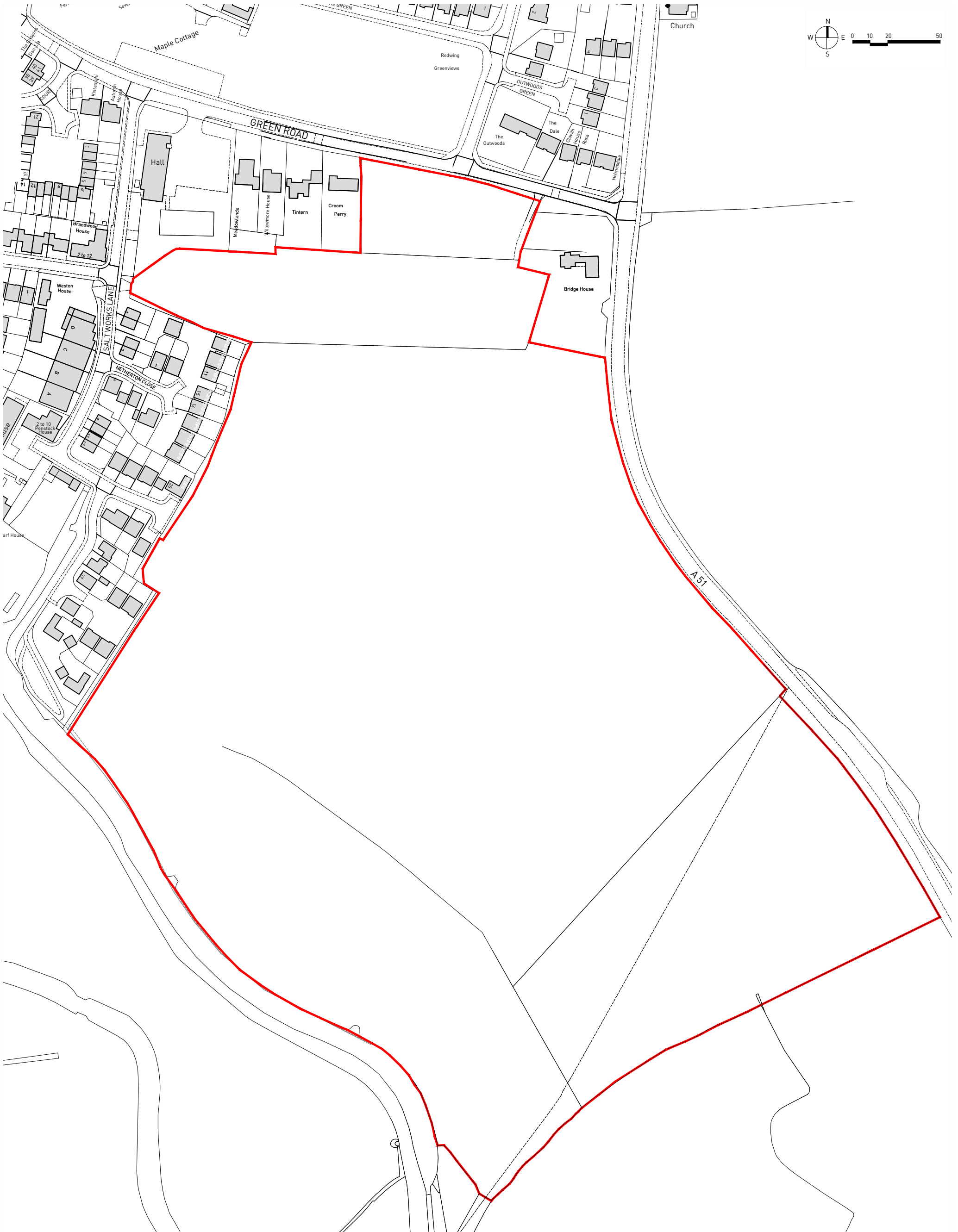
4.9 This response has been prepared by Richborough to provide detailed comments on the vision, spatial strategy and key policies of the Preferred Options; and to demonstrate the availability, suitability and deliverability of the site at Green Road to provide a high-quality residential development as part of a balanced spatial strategy for Stafford.

4.10 In summary, this response sets out that:


1. The Preferred Options proposed **Development Strategy** should be more ambitious and support a more balanced spatial strategy that:
 - a. Adopts a more ambitious housing need target, of 746dpa or higher, that supports the exceptional potential for growth in Stafford, reflects strong past trends in delivery and contributes to meeting the Borough affordable housing needs; and
 - b. Removes Meecebrook Garden Community as an allocation and stand-alone settlement at Tier 3 of the settlement hierarchy and takes a more balanced approach to apportioning an appropriate level of growth to the Borough's larger settlements, which have a higher capacity for growth and should accommodate additional growth to support a more balanced spatial distribution of housing.
2. The approach to **Strategic and Site Allocations** should be reconsidered as the Preferred Options Plan progresses to Regulation 19, including:
 - a. Removing Meecebrook as a strategic site – which has been selected based on a pre-determined site selection process; and which is fundamentally unsustainable, inaccessible and undeliverable.
 - b. Considering a more balanced spatial strategy, by removing the Meecebrook strategic allocation, and delivering dispersed and sustainable growth across the Borough's larger settlements.
 - c. Allocating land for new homes in Weston, to ensure that housing choice, vitality and affordability are not stifled in the village; which would fail to meet the needs of the next generation of residents.
 - d. Considering the re-assessment and allocation of a reduced capacity scheme on land to the south of Green Road in Weston (combined sites WES02 and WES03), which will deliver significant enhancements in biodiversity and

accessible multi-functional and recreational space, that includes a new Country Park and Canalside Walk – on a site that demonstrated to be wholly available and deliverable. Options for a reduced capacity scheme on the site are presented at Appendix 2.

Appendix 1 - Site Location Plan



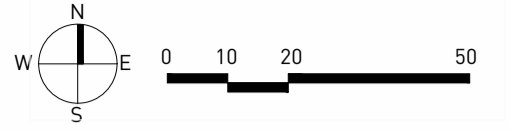
Boundary lines plotted are subject to survey

 Site location
38.18 Acres/
15.45 Hectares



LAND OFF GREEN ROAD, WESTON. STAFFORDSHIRE PROPERTY PLAN

Appendix 2 – Illustrative Masterplan Options



KEY DESIGN PRINCIPLES

1. Proposed vehicular and pedestrian access off Green Road;
2. Existing building line to be continued along site frontage and to face into existing Green;
3. Existing urban edge to be extended southwards and eastwards into the site;
4. Existing play area;
5. Building patterns to maintain outward view from gable of Bridge House;
6. Community Green and children's play area;
7. Natural play trail;
8. Dwellings offset a minimum of 21 metres from existing dwellings;
9. Tree lined verge;
10. Building patterns in alignment with existing patterns to reduce overlooking;
11. Focal point space;
12. Localised street narrowing across central corridor;
13. Reinstated field hedgerows;
14. Storm water drainage ditch/ swale;
15. Central green corridor;
16. Low density housing frontages;
17. Supplementary landscape;
18. Existing landscape;
19. Canalside walk;
20. Link to existing footpath; and
21. Emergency access via Saltworks Lane.

LEGEND

- Site location
31.66 Acres/
12.81 Hectares
- Residential development
- Potential later residential development
- Public open space
- Proposed landscape
- Key pedestrian links
- Sustainable drainage

LAND OFF GREEN ROAD, WESTON, STAFFORDSHIRE
PROPOSED INDICATIVE MASTERPLAN



Appendix 3 – Review of New Passenger Station Proposals

Meecebrook

Review of new passenger station proposals

5th December 2022

Document history

Date	Version	Issued to	Status	Quantity	Format	Approved
01/12/2022	1	Client	Draft	1	PDF	NTG
02/12/2022	2	Client	Draft	1	PDF	NTG
05/12/2022	3	Client	FINAL	1	PDF	NTG

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1 Introduction

1.1 Scope of this report

- 1.1.1 Stafford Borough Council (SBC) is promoting a new Garden Community settlement at Meecebrook. SBC describe the site as lying approximately 6km west of the market town of Stone, in Staffordshire and near to the villages of Eccleshall, Swynnerton and Yarnfield. The M6 motorway runs east of the site, along with the HS2 line. The West Coast Main Line and Stafford to Manchester Railway Line, via Stoke-on-Trent, form part of the extensive railway network surrounding the site, with the closest station located in Stone.¹ The new Garden Community would include around 6,000 homes, employment space and community facilities. This will also include infrastructure needed to support the homes like GP and health provision, sustainable travel, and a new West Coast mainline railway station. Meecebrook Garden Community will be considered as part of the Council's Local Plan 2020-2040 process, with 3,000 new homes and necessary infrastructure to be delivered by 2040, and a further 3,000 new homes beyond 2040.²
- 1.1.2 Intermodality has been commissioned by a consortium of developers and land promoters, comprising Richborough Estates Ltd, Bloor Homes Ltd, Bellway Homes Ltd and Stoford Developments Ltd, to review the Council's proposals for the new station on the West Coast Main Line (WCML).

¹ Meecebrook Garden Community Leaflet, page 2

² <https://www.staffordbc.gov.uk/meecebrook-new-garden-settlement>

2 Development of new station proposals

2.1 Network Rail guidance

2.1.1 Network Rail (NR) is the licenced, regulated manager of the national rail network. Any new station proposal on the national rail network will require engagement with, and approval of, Network Rail. Network Rail's licence obligations require it to be confident that when schemes are completed, they can be operated and maintained safely, reliably, efficiently and cost effectively.³

2.1.2 In its guide to investment in new stations, Network Rail states (our highlighting):

The Investment in Stations Guidance is for use by any organisation which is interested in investing in station facilities. Such promoters would typically include **local authorities**, private developers, regional bodies and community rail partnerships. The guidance aims to ensure that such investment returns the maximum benefit to the investor and to passengers and other station users.

New Stations: A Guide for Promoters was originally published by the Strategic Rail Authority (SRA) in 2004. Following significant changes in the structure of the rail industry and the winding up of the SRA, Network Rail published a revised document Investment in Stations: A guide for promoters and developers in 2008. An update was published in 2011 to accompany the Network RUS: Stations published in the same year. This 2017 version retains the core guidance offered in the 2011 edition. Updates have been made to structure and content based on feedback from stakeholders:

- The document has been updated to take account of changes to legislation, policy and standards;
- **Greater emphasis is placed on the requirement that schemes be value for money, fit with industry plans, have an affordable whole life cost, and minimise disruption to the operational railway;**
- The document has been restructured to guide promoters clearly through key considerations for the initial development of a scheme.

The key considerations discussed are as follows:

- An option selection process should be carried out in order to establish that the option selected is the most effective means of achieving the promoter's objectives;
- **Engagement with both the local train operating company (TOC) or companies, the Station Facility Owner (SFO) and Network Rail is vital as they can advise the promoter as to the potential operational and financial viability of a proposal for station investment at an early stage;**
- **Enhancement of existing station facilities should generally be the first option considered for station investment as it is likely to minimise disruption and adverse operational impacts on the railway.** Consideration should be given to relocating an existing station or the opening of a new station where enhancement does not meet the scheme's objectives or there are additional benefits associated with these options. **However, station relocation or the addition of a new station to the network is likely to cause disruption and will only be possible where operational constraints allow;**

³ Investment in Stations, A guide for promoters and developers, Network Rail June 2017, page 17

- The timescale for construction of a new station is generally, on average, two years from start to finish. Significant time before this is required to develop and approve a proposal;
- Any proposed investment needs to demonstrate a positive impact for passengers and the existing railway network. For example, a new station needs to serve a new market and provide links to origins and destinations which would be desirable to potential passengers **without substantial disadvantages such as longer journey times for existing passengers**. This positive impact should be demonstrated in a WebTag compliant business case;
- Investment proposals must consider government objectives for the relevant route and the Long Term Planning Process (LTPP) which is the rail industry's plan to 2043. **Proposals which have impacts conflicting with industry strategy are unlikely to secure industry support**;
- Proposed investment should consider other recent and planned investments in stations and the rail network. A programme of planned investment may provide a good or even a one-off opportunity for coordinated third party investment in station facilities. Conversely, the relocation of a station which has recently seen substantial investment or **the opening of a new station on a section of line that has had journey time improvements is unlikely to offer benefit to the railway**;
- When station investment is partially or wholly funded by the Department for Transport (DfT) or Transport Scotland (TS) from a ring fenced fund, or is under a commercial framework to administer DfT or TS funding, the investment should be targeted to meet the conditions of that funding. These may include revenue return to the DfT or TS, generation of new revenue streams, passenger satisfaction improvement measurement through passenger survey Key Performance Indicators (KPIs) or other specific objectives.⁴

2.1.3 Network Rail then summarises the process for preparing a proposal for a new station:

- In order to show how the above objectives will be achieved by investing in a station the proposal will need to:
- Identify the nature of the local transport challenges being faced;
 - Determine the different transport options that could be adopted;
 - Understand the existing and future market for rail travel;
 - Demonstrate why a rail based enhancement is most appropriate as part of a package of enhancements or on its own;
 - Evaluate which of the potential options for rail investment is appropriate; consideration should be given to rolling stock and timetabling solutions which for some objectives may offer better value for money than investment in a station;
 - Consider the impact of the proposed option on the operation of the railway;
 - Consider how the proposed option fits with industry strategy and objectives.⁵

2.1.4 Throughout the document, Network Rail stresses the importance of early engagement with the rail industry on proposals for new stations, stating:

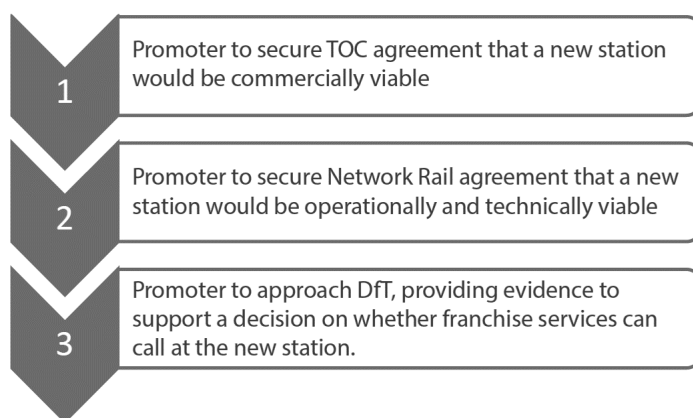
⁴ Pages 3-4

⁵ Page 5

A Train Operating Company (TOC) must support the provision of services to the new station and early engagement with TOCs is essential to any proposal.⁶

Without a positive business case a scheme will not be taken forward for consideration by railway industry stakeholders. The railway industry encourages promoters to have early discussions with the contacts identified in chapter 8 to establish the likely viability of proposals and for guidance in preparing a business case. It is vital that rail industry bodies are consulted as early as possible in the development of a proposal for investment in a station. Network Rail and the relevant TOC(s) will be able to gauge the potential viability of a scheme from the outset. They can also provide specific local advice and guidance on operational considerations which must be taken into account in order to develop a successful proposal, and information on any enhancements or changes to service patterns already planned at the station. The diagram below sets out the early steps promoters should take in developing a proposal for a new station.⁷

Figure 1 Early steps for promoters of new stations (source Network Rail)



Operational and performance issues need to be considered at the inception stage of the project and early engagement with Network Rail and TOCs is recommended to establish scheme feasibility. It is important that a proposal for a new station is developed with cognisance of the current and planned service pattern on the route and of existing infrastructure constraints. Engagement with Network Rail is advisable in these cases as they may be able to provide an early view of forthcoming Route Study recommendations.

Having established whether there is a fit with the industry planning framework, a promoter will also need to form an early view as to the appropriate service pattern at the new station. This would include the practicality of stopping all or just some of the existing services at the new station, or of introducing new services to serve the facility. The views of the relevant franchising authority should be sought.⁸

⁶ Page 6

⁷ Page 7

⁸ Page 13

Early engagement with the rail industry is indispensable to ensure that proposals for station enhancements or new stations can be developed successfully. Network Rail's route-based Strategic Planning teams act as the first point of contact for promoters. Where Network Rail is involved in the proposed enhancement, Network Rail's Strategic Planning teams will work with developers and local authorities on the scheme throughout the feasibility processes and planning stages.⁹

As the day to day operators of stations, TOCs have invaluable knowledge about the needs of their customers and the issues that need to be addressed. They are a key party to any changes that are proposed and should be involved in any proposal from an early stage.¹⁰

Early dialogue with industry parties is essential as they can assist promoters in working through these requirements and in some cases take the lead to ensure that certain requirements are met.¹¹

- 2.1.5 In addition to Network Rail, the Department for Transport (DfT) will in turn expect to receive an initial Strategic Outline Business Case (SOBC) for the new station, as with other station projects being developed or promoted in recent years (see Table below). This also highlights the range of lead times involved in delivering new stations:

Table 1 Examples of recent station SOBC

Site	First proposed	SOBC	BCR	Opening date
Old Oak (London) ¹²	2010	2017	3.5	2030
Magor and Undy (South Wales) ¹³	2013	2018	1.7	None at present
Worcestershire Parkway ¹⁴	2006	2014	3.3 – 3.6	2020
Cambridge South ¹⁵	2017	2021	1.9	2025
Darlaston and Willenhall stations (West Midlands) ¹⁶	2017	2021	4.7 – 6.5	2023

⁹ Page 17

¹⁰ Page 20

¹¹ Page 21

https://www.whatdotheyknow.com/request/599394/response/1427134/attach/3/FINAL%20Old%20Oak%20Overground%20Stations%20Consolidated%20SOBC%202017%20Full%20Document.pdf?cookie_passthrough=1

¹³ <http://magorstation.co.uk/wp-content/uploads/2020/06/Magor-and-Undy-Station-SOBC-revB.pdf>

¹⁴ <http://e-planning.worcestershire.gov.uk/swift/apas/run/WCHDISPLAYMEDIA.showImage?theSeqNo=15526&theApnkey=848&theModule=1>

¹⁵ <https://sacuksprodnrdigital0001.blob.core.windows.net/twao-cambridge-south-infrastructure-enhancements/Cambridge%20South%20station%20OBC/Cambridge%20South%20Outline%20Business%20Case.pdf>

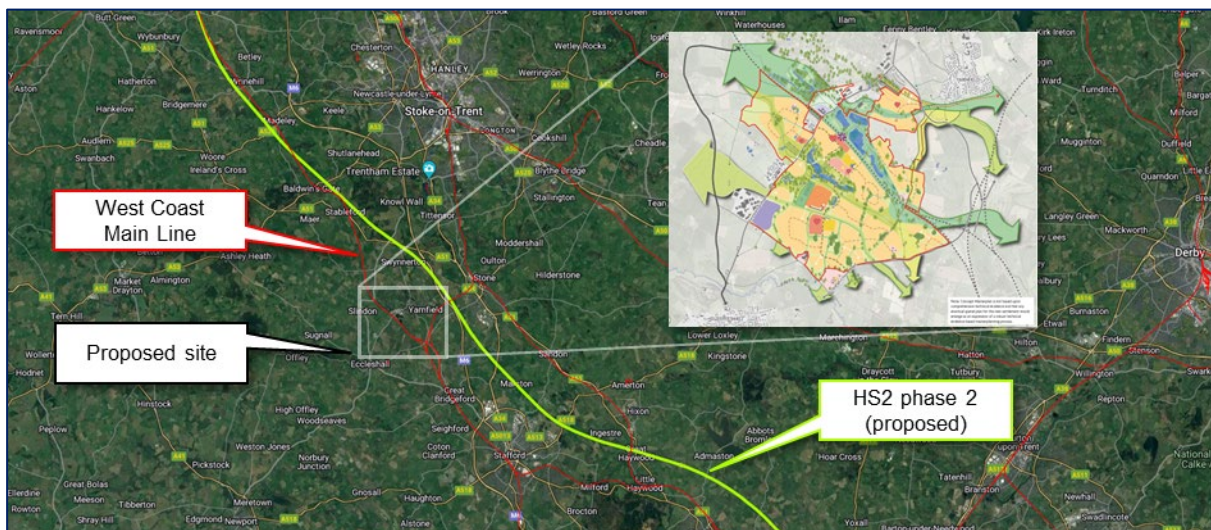
¹⁶ <https://governance.wmca.org.uk/documents/s5126/Report.pdf>

3 The proposed site

3.1 Location

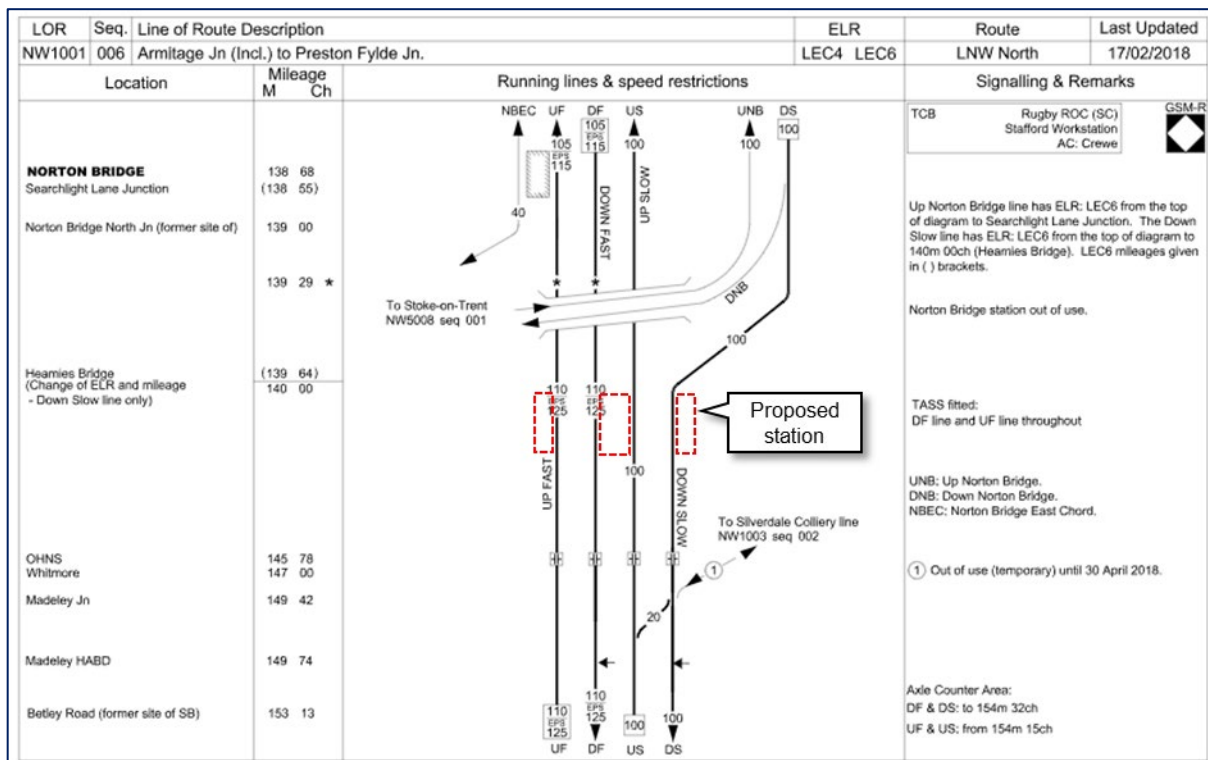
3.1.1 The location of the site relative to the West Coast Main Line (WCML) is shown in the Figure below:

Figure 2 Location plan



3.1.2 The site is located immediately to the north of Norton Bridge Junction, a major grade-separated intersection of the WCML between the routes to Crewe, Stafford and Stoke-on-Trent respectively:

Figure 3 Site location (source Network Rail Sectional Appendix, north to bottom of picture)



- 3.1.3 The proposed location is a four-track main line, with trains passing the site at speeds of up to 100-125mph. It is also worth noting that the track layout has two running lines for “fast” services at 110-125mph linespeed on the eastern side of the formation (left on the above Figure) and two running lines for “slow” services on the western side of the formation (right on the above Figure). The feasibility studies undertaken for SBC (see next section) assume that new platforms would be needed to enable trains to call at the station on the fast lines when the slow lines are closed for engineering and vice versa. This would require major works to (and disruption of) the entire WCML, to separate the fast and slow lines to allow the insertion of a new island platform and outer platforms, as indicated in the Figure above.

3.2 West Coast Main Line current traffic levels

- 3.2.1 The WCML falls within Network Rail’s North West & Central (NW&C) route, described as follows:

NW&C is the ‘Backbone of Britain’ – the economic spine linking our main cities. We connect workers with jobs, people with loved ones and goods to market.

Our infrastructure runs from London Euston and Marylebone in the south through the Chiltern and West Midlands regions, the North West of England and Cumbria before joining with Scotland at Gretna. We are home to the West Coast Main Line, the busiest mixed-use railway in Europe, serving London, Birmingham, Manchester, Liverpool, Edinburgh and Glasgow.

In the five years to 2024, passenger demand is set to grow by 12% and freight by 18%. Major railway upgrade schemes to cater for this growth include HS2, East West Rail, Midlands Rail Hub and the Great North Rail Project.

- 246.5 million annual rail passenger journeys;
- 1.3 million passengers travel through this region each weekday;
- 6,724 passenger and freight services per day;
- 700,000 tonnes of freight is moved each week.¹⁷

- 3.2.2 With regard to the section of the WCML south of Crewe, Network Rail further notes:

The West Coast South route stretches from the south of Crewe to London Euston. It carries millions of passengers and up to 10% of freight traffic a year.

It’s also the busiest mixed-use railway in Europe, forming Anglo-Scottish journeys between London, Glasgow and Edinburgh via the West Midlands and North West, as well as providing commuter links direct to the capital through Hertfordshire, Northamptonshire and Buckinghamshire.

This piece of track is the main route for electrified freight trains which helps to remove lorries from the roads and will contribute to the UK’s ambition to reach net zero carbon emissions by 2050.¹⁸

¹⁷ <https://www.networkrail.co.uk/running-the-railway/our-regions/north-west-and-central/>

¹⁸ <https://www.networkrail.co.uk/running-the-railway/our-routes/west-coast-mainline-south/>

- 3.2.3 The latest (December 2022) working timetable (WTT) shows over 500 trains passing the site every 24 hours, split almost 50:50 between passenger and freight, with a train passing the site of the new residential community every 3 minutes throughout the day and night, including 2,400 tonne aggregate trains, 775m long intermodal trains and 125mph high-speed passenger trains.¹⁹ This level of intensity and variety of rail traffic creates major challenges for developing any new station on this section of the WCML, not least the knock-on effects to existing passenger and freight services of introducing an additional station stop within the timetable.
- 3.2.4 Even with the proposed construction of phase 2 of HS2 (see below), the WCML is already expected to see additional growth in traffic for passenger and freight, the latter boosted by new developments such as the West Midlands Interchange project under construction to the south of Meecebrook, at Four Ashes in Staffordshire, which will have capacity to generate up to 10 new freight trains per day onto the WCML.²⁰

3.3 West Coast Main Line journey time improvements

- 3.3.1 The WCML has been the subject of a series of major route upgrades to improve capacity and capability over the last 20 years. The first phase of the upgrade, south of Manchester, opened in 2004 delivering journey time improvements of 1 hour 21 minutes for London to Birmingham and 2 hours 6 minutes for London to Manchester. A second phase, introducing 125 mph running along most of the line, opened in December 2005, bringing the fastest journey between London and Glasgow from 5 hours 10 minutes to 4 hours 25 mins. Substantial further works were undertaken, including quadrupling of the track in the Trent Valley, upgrading the slow lines, remodelling track and signalling through Nuneaton, Stafford, Rugby, Milton Keynes and Coventry stations, which was completed in late 2008. A £250 million project to grade-separate the tracks at Norton Bridge, which allowed for increased service frequency as well as improved line-speeds, was completed in 2016.
- 3.3.2 We are not aware of the Meecebrook station proposals ever being considered within any of these route upgrades, Network Rail noting in its new station guidance (see previous section) that “the opening of a new station on a section of line that has had journey time improvements is unlikely to offer benefit to the railway.”

3.4 West Coast Main Line route strategy

- 3.4.1 Network Rail’s specification of, and plans for, the WCML are set out in its 2021 Route Specification document.²¹ Network Rail makes no reference to proposals for a new station at Meecebrook.

3.5 HS2

- 3.5.1 Phase 2a would extend the new high speed railway line north west to the proposed Crewe Hub station from the northern extremity of Phase 1 (London to West Midlands) north of Lichfield. Phase 2a was approved by the House of Commons in July 2019, and received Royal Assent on 11 February 2021. Construction of phase 2a will be in parallel with Phase 1, HS2 suggesting that services will begin operating between London, Birmingham and Crewe between 2029 and 2033.²²

¹⁹ Source Network Rail (realtimetrains.co.uk website)

²⁰ <https://news.railbusinessdaily.com/west-midlands-interchange-is-set-to-boost-local-jobs-and-the-economy/>

²¹ Delivering a better railway for a better Britain Route Specifications 2021 North West and Central (NW&C) region, Network Rail

²² <https://www.hs2.org.uk/the-route/west-midlands-to-crewe/>

4 Meecebrook station feasibility studies

4.1 Reports produced to date

4.1.1 Reports produced to date include:

- Meecebrook Garden Community Transport Strategy, July 2020 (Atkins);
- Pre-Feasibility Report V0.1, March 2022 (SLC Rail);
- Feasibility Report v1.0, July 2022, updating work in the March 2022 report (SLC Rail).

4.2 July 2020 Atkins report

4.2.1 Notably, the Atkins report assumed a much higher level of development (around 10,000 homes²³) than currently proposed.

4.2.2 The main findings of the 2020 report related to the station included:

- Overall, it was found that the additional trips on the external highway network as a result of trips from Meecebrook Garden Community would still have a major impact even with the new railway station, and therefore potential mitigation solutions would need to be considered, including
 - Highway mitigation measures along existing corridors or junctions to improve the existing highway capacity;
 - An additional motorway junction to provide additional access to the SRN; or
 - The promotion of alternative sustainable modes of transport to reduce car dependency;²⁴
- It is understood that Staffordshire County Council (SCC) are engaging with Network Rail regarding the potential to deliver a new railway station on the West Coast Mainline;²⁵
- Stafford Borough has good rail connectivity and is served by the West Coast Main Line with existing railway stations located at Stone, Stafford and Stoke-on-Trent. It is important to note that the proposed alignment of HS2 runs to the north of the site. It is proposed that Stoke will become an 'integrated high-speed station' where passengers can travel on classic-compatible HS2 trains and access the high-speed network to the South.²⁶

²³ Page 4 section 1.1

²⁴ Page 7, 24

²⁵ Page 8

²⁶ Page 8

4.3 July 2022 SLC report

Demand modelling

- 4.3.1 SLC draws on an appended analysis by SYSTRA to conclude that once Meecebrook is fully built there is a prospect of station revenue generating a medium level of value for money (BCR 1.5). To set this in context, the Department for Transport's "WebTAG" categorisation of projects defines "medium" value for money as a BCR of between 1.5 and 2.0, so the case for the new station would be at the lower end of this range.
- 4.3.2 It is also important to note here the assumption in the demand forecasting that the new station would be open by 2026 (an optimistic assumption, given the time stations can take to plan, secure approval / funding and construct, see Table 1), but to achieve a viable position the entire 6,000 homes would need to have been delivered.
- 4.3.3 This is an important point to note, as SBC suggest an initial phase of 3,000 new homes and necessary infrastructure to be delivered by 2040, and a further 3,000 new homes beyond 2040, the implication being (assuming the Council's lead-in times and delivery rates of 300 dwellings per annum) that 6,000 homes could take until beyond 2050 to deliver. In the interim, SYSTRA has previously noted, in a separate analysis of another proposed settlement and station in Bedfordshire on behalf of the local planning authority, that:

The development, in isolation of any other new settlement development options, will allocate 4,500 dwellings, **below the 5,000 dwellings considered the indicative benchmark for considering the construction of a new railway station.**²⁷

- 4.3.4 It is also worth noting that SYSTRA forecast that a new station would abstract customers from existing stations of 4,423 per annum in 2026 (assumed first year of opening, 4 years before the delivery of any houses on site) to 9,936 in 2040 (end of Local Plan Period).²⁸ SYSTRA further note in this regard:

The number of passengers lost from existing services [14,000 in 2026 to 31,000 in 2040] is fairly significant compared to station trip generation in 2026. However, by 2040, after full development build out this is far less significant.²⁹

- 4.3.5 This level of abstraction from existing stations and services (which would be assumed to increase further beyond 2040) would be one of the key considerations by TOCs, Network Rail and DfT in determining the acceptability of the new station proposals. In the short term, the implication is that the new station, in a remote location devoid of any development, would then abstract passengers from existing stations, diverting highway trips into the local area.
- 4.3.6 SYSTRA conclude the analysis that:

Our analysis has shown that that station is predicted to generate medium value for money. However, this is entirely dependent on the delivery of development surrounding the station.³⁰

- 4.3.7 SYSTRA then reiterate later in the document that:

²⁷ Sharnbrook Railway Station Initial Transport Feasibility, SYSTRA for Bedford Council

²⁸ Page 13 of SYSTRA report

²⁹ Page 14 of SYSTRA report

³⁰ Page 9 of SYSTRA report

Delivering a station at Meecebrook is predicted to deliver Medium value for money. However, this is heavily dependent on the delivery of the adjacent Garden Village development.³¹

Train Service Planning

- 4.3.8 SLC conclude that there is a reasonable prospect of achieving a train frequency of two trains per hour at the station, albeit noting that HS2 introduces a level of complexity in developing a future train plan specification.
- 4.3.9 These conclusions draw on supporting appended work by Rail Aspects, which sets out the context in terms of current traffic levels and utilisation of the WCML, stating:

The Stafford-Crewe section of the WCML is intensively utilised, although the segregation of Fast Lines and Slow Lines combined with the recent grade-separation of the junction at Norton Bridge provide some flexibility with the principal constraints being either side of Crewe, where the four-track alignment narrows to a three-or two-track alignment.

South of Stafford, the Trent Valley is a 2-track railway between Milford Jn. and Colwich Jn., then reverts to 4-track except for a short distance south of Nuneaton.

The route between Stafford and Wolverhampton is, by the current standards of the railway network, relatively lightly utilised with only six trains passing in each direction in most hours. Further to the south, this route becomes increasingly congested through Wolverhampton and at Birmingham New Street and the service is sufficiently intensive throughout the day that it is very difficult to find flexibility in train paths.

Onwards towards Liverpool, the route is fairly congested with a mixture of high-speed, regional and local services, although with some flexibility around individual train paths.

In summary, retiming of services to accommodate a station call at Meecebrook would probably need to take place away from Birmingham New Street and the WCML South, and also minimise any impact on high-profile, high-speed services on the WCML.³²

- 4.3.10 An important point to note from the Rail Aspect report is the need for new platforms serving both the fast and slow lines on the WCML, the report stating:

Provision of station calls at Meecebrook is highly likely to require provision of a 4-platform station, i.e. platforms on the Fast Lines and on the Slow Lines. Although it would probably be possible to arrange for the majority of weekday stopping services to be timetabled on the Slow Lines, this would not be possible on Sundays owing to engineering access restrictions. It is also considered likely that services planned via the Slow Lines will be regularly run via the Fast Lines during periods of disrupted running, as a service recovery measure.³³

- 4.3.11 The Rail Aspect report notes potential issues with the signalling and operation of services through any new station:

³¹ Page 19 of SYSTRA report

³² Page 6 of Rail Aspect Report

³³ Page 2 of Rail Aspect Report

Local signalling is designed for high speed non-stop services, with block lengths of 1100m to 1400m (Figure 2) and the planning headway in the immediate vicinity is 3 minutes between following train services (up to a maximum of 13 trains per hour on the Fast Lines).

Consequently, it should be assumed that the current signalling would not be ideally suited to stopping of services within the signal blocks.

However, given the relatively anticipated level of service, together with the flexibility offered by the 4-track configuration, any alterations to existing signalling are considered likely to be necessary only if it is required to run consecutive stopping services at close headways or if the location of existing signals conflicts with other engineering considerations such as the location of station platforms.

4.3.12 In terms the performance impact on other services, the Rail Aspect report states (our highlighting):

Introduction of the station calls within the existing service would likely have some performance implications, particularly in the form of risk of knock-on delays to other train services, **as the route is congested, especially towards Liverpool, and towards Wolverhampton and Birmingham**. These risks have not been quantified but are considered unlikely to be severe enough to prevent further development of the scheme at this stage.³⁴

It is inevitable, when inserting additional station calls in existing services, that some level of performance risk is incurred. It is noted that the WMT London Northwestern service groups have recently performed below Operator target performance levels, and any proposals to modify the service are likely to have some degree of sensitivity around potential performance impacts.

In this case, the specific risks would be increases in “1st Order” reactionary delays along the Stafford-Crewe corridor and potentially on towards Rugby, Birmingham and Crewe, i.e. faster trains being delayed by the stopping services. “2nd Order” reactionary delays, i.e. outbound services delayed by late arrival of the inbound service might also be a risk, in particular at Liverpool (see Section 8.3) and Birmingham New Street where some splitting and joining of services takes place.

Avanti West Coast have stated an objective of running a second hourly Euston-Liverpool path. Details of this service are not yet available; there is some risk that this would further complicate adjustments to the timetable.

Aside from performance risks, there may be complexities in the detail of retiming of services either locally (for example, diverting from the Fast to the Slow line) or more widely (for example, rigid timetable structures in the Liverpool area) that are not apparent from this initial overview.³⁵

4.3.13 The situation post-HS2 is also referenced by Rail Aspect, which notes (our highlighting):

Once Phase 2a is open between Birmingham and Crewe, high speed services are expected to operate from London Euston via HS2 and Crewe Hub, to Glasgow, Edinburgh, Manchester, Liverpool and North Wales using classic-compatible high speed rolling stock.

³⁴ Page 2 of Rail Aspect Report

³⁵ Pages 11 and 12 of Rail Aspect Report

In theory, this will remove most long-distance high-speed traffic from the WCML south of Crewe; **however, it appears likely that at least some paths will be retained to maintain connectivity with intermediate stations** such as Milton Keynes, Rugby, Coventry, Wolverhampton, the Trent Valley stations and Stafford. As end-to-end journey times will become less sensitive, it is also possible that these paths will be regularised, e.g. adding additional calls at Milton Keynes or Stafford, for example.

This would offer improved journey times from these locations whilst also reducing constraints on capacity on the Stafford-Crewe section, either by reducing the number of required paths or by increasing the flexibility of remaining paths (possibly also opening up the potential to introduce calls at Meecebrook in residual train services).

However, constraints on other routes (Crewe to/from Liverpool in particular, and between Wolverhampton and Birmingham to some extent) would probably remain in place post-HS2.

4.3.14 In terms of industry engagement, Rail Aspect confirm that no industry engagement was undertaken at the time of writing, noting that Train Operating Companies (TOCs), Freight Operating Companies (FOCs) and Network Rail will need to be engaged at the earliest opportunity.³⁶

4.3.15 Rail Aspect concludes that:

Based on the analysis that has been conducted, and assuming a timetable baseline equivalent to the December 2019 (pre-COVID) service specification, station calls at Meecebrook could be accommodated in at least one of the two existing twice-hourly West Midlands Trains services between Liverpool Lime Street and Birmingham New Street/London Euston, by means of timing adjustments to these services and without undue consequences.

Insertion of calls in other passing services (predominantly Avanti West Coast high speed services) is likely to prove more problematic and has not been investigated in depth at this stage.³⁷

4.4 Station location, value-for-money and Strategic Case

4.4.1 SLC conclude in the Executive Summary that:

- A potentially viable location has been identified;
- A good prospect of obtaining an acceptable BCR;
- A proposed methodology to make the strategic case is defined, although the summary table indicates that work on the strategic case was yet to be completed.

4.4.2 SLC appear to have undertaken a considerable amount of work, covering technical disciplines and topics typically associated with, involving or led by Network Rail, but without any evidence of Network Rail (or wider industry) involvement in developing, reviewing or validating this work.

4.4.3 Of the options considered, SLC indicate the North Option to be preferable, within the context of the main risk and cost drivers identified as follows:

³⁶ Page 12 of Rail Aspect Report

³⁷ Page 1 of Rail Aspect Report

The main risk and cost drivers for this option are associated with the signalling modifications required to accommodate the station, as the existing signals are too far away (and obstructed by structures) to be visible from the platform ends. Early engagement with Network Rail's Signalling Project Engineer (PE) and Route Asset Manager (RAM) is therefore critical to the success of this option.

In addition, the Network Rail RRAP [Road-Rail maintenance vehicle Access Point] will need to be relocated to accommodate the new platform, however as the existing RRAP and access route is located fully within the boundaries of the current development masterplan, it is assumed that this relocation will be feasible and some change to the RRAP will be required as part of the development masterplan, regardless of the station project going ahead.³⁸

- 4.4.4 In terms of costs, SLC suggest the base cost for the North Option to be £34.1m, plus risk allowance of 60%, totalling £54.6m, SLC noting these exclude the significant recent increase in construction costs.³⁹ This differs from the assumption used in the SYSTRA report of £39.99m plus Optimism Bias, market price conversion and inflation totalling £102.6m, almost twice that assumed by SLC.⁴⁰
- 4.4.5 The reports do not explain how the difference between station / farebox income and the significant upfront investment costs, or annual operating costs (£200,000 excluding Optimism Bias of up to 41%⁴¹) would be covered in the period between 2026 and the mid-2050s when the development achieves the critical mass needed to deliver a viable business case.

4.5 Rail industry engagement

- 4.5.1 As with the Network Rail guidance set out in Section 2 earlier, the SLC report makes repeated references for the need to engage with the wider rail industry, but there is no evidence that the local authorities have engaged with Network Rail, TOCs, FOCs, the Rail Delivery Group, the Rail Freight Group, or the Department for Transport.
- 4.5.2 This lack of engagement is highlighted by a recent (October 2022) Freedom of Information request made to Network Rail asking for confirmation of whether a new station had been agreed with SBC and what stage the proposals had reached.⁴² Network Rail responded (see Appendix) stating that (our highlighting):

1) Please confirm if a new West Coast Mainline station has been agreed.

We have not made any agreements relating to a new station at Meecebrook. As mentioned above, our planners are carrying out work to assess the long-term impact of some new station proposals on the West Coast South route, but this work is not looking at developing the case for, or the deliverability of, a new station at Meecebrook in the short-to-medium term.

2) If it has not been agreed, what stage are proposals at?

There are currently no Network Rail proposals for a station at Meecebrook and our planners have advised that they have not been consulted with directly by Stafford Borough Council or Staffordshire County Council on this subject.

³⁸ Page 31 of the Feasibility Report

³⁹ Page 18 of Feasibility report

⁴⁰ Page 16 of SYSTRA report

⁴¹ Page 17 of SYSTRA report

⁴² https://www.whatdotheyknow.com/request/meecebrook_claims_regarding_new

3) What would be the approximate total cost of a new station?

We are unable to advise on this point, as Network Rail has not assessed this.

4) Who would pay for this?

Again, we are unable to advise as we do not have any specific proposals for Meecebrook.

5) Does a new development on greenfield (instead of brownfield) fit with the Network Rail environmental strategy?

As we have not been involved in any proposals, this is not something Network Rail has looked at.

5 Conclusions

5.1 The case for a new station at Meecebrook

5.1.1 The pre-feasibility and feasibility studies, and our assessment of the technical work, highlight several key issues and areas of risk in developing a brand new, multi-platform station on the WCML, including:

- The intensity of current rail services on the WCML, the 'Backbone of Britain', the busiest mixed-use railway in Europe with a nationally-significant role for moving passengers and freight;
- A series of major upgrades to the WCML have been undertaken in recent years to improve capability and reduce journey times, including a major grade-separated junction at Norton Bridge, but without any provision being made in the previous or current strategy for any new station at Meecebrook;
- Engineering access on the WCML, which shuts either the fast or slow lines passing the site, would necessitate a 4-platform station to be constructed for network operational reasons, but which would not otherwise be justified commercially, adding substantially to the complexity, cost and risk of delivering the station, relative to the size of the adjacent development which would need to fund and sustain it;
- Current signalling not being suitable in capacity or location to accommodate a new station, and as such adding to the complexity, cost and risk of delivering the project, in terms of new and altered signalling;
- A new station would abstract demand and revenue from existing stations;
- The need for the entire development to be completed (which might not occur for another 30 years) in order to generate sufficient critical mass of demand, with no indication in the reports on how / who would cover the financial losses in the intervening period;
- The ability to fund and deliver rail enhancements in the current climate, SLC noting recently that:

Covid-19 and its multiple impacts on ways and places of work, demand for rail travel, government funding of railway services and future enhancements, and some resultant semi-permanent service reductions, including a number affecting Worcestershire.

The collapse of rail passenger demand during the COVID lockdown from March 23rd 2020 not only required substantial funding support from government for the maintenance of services but challenged industry thinking and evidencing of future network development given its impact upon ways of working, locations of work, commuting and leisure travel, and hence of the nature of train services and connectivity that may be required in a post-COVID future.⁴³

- The conclusion from Atkins that, even if the station were to be delivered, the development would still generate considerable levels of highway trips, requiring further mitigation measures;⁴⁴
- The conclusion of SLC that the station business case would achieve a BCR of 1.5, at the low end of the range for "medium" value for money.

⁴³ Worcestershire Draft Rail Investment Strategy 2 2022 to 2050, SLC Rail for Worcestershire County Council, July 2022, pages 3 and 9

⁴⁴ Atkins report page 7, 24

- 5.1.2 Even setting aside these challenges, the fundamental concern with the conception of the proposals for a new station at Meecebrook is the apparent complete lack of early (or any) engagement with the rail industry, especially with Network Rail as the licenced, regulated manager of the national rail network. Network Rail's licence obligations require it to be confident that when schemes are completed, they can be operated and maintained safely, reliably, efficiently and cost effectively. Network Rail's guidance clearly and repeatedly states the need for, and benefits of, early engagement with industry, including TOCs, FOCs, DfT and other industry stakeholders
- 5.1.3 The WCML is one of the busiest routes in Britain, therefore demonstrating a compelling business case, in operational or commercial terms, will be particularly challenging. The post-COVID environment, with the substantial structural reductions in travel, farebox income and investment, means the value-for-money threshold for new stations across the network will now be set even higher, as promoters chase reduced public funding.
- 5.1.4 This creates a major concern with the viability of the proposed new station, given that the level of development needed to achieve (at best) a medium level of value-for-money would not be in place before the mid-2050's at the earliest, but with a scheme that assumes a station would be fully operational (with all investment and operating costs then covered) within the next 4 years. It is a major concern that the work to date does not explain how the significant upfront investment costs (£54-103m, which as SLC note does not factor in the significant recent increases in construction costs) or operating costs (£200,000 per annum excluding Optimism Bias of up to 41%) would be covered in the period between 2026 and the mid-2050s.
- 5.1.5 Having progressed early-stage multi-disciplinary feasibility work in the post-COVID rail sector, for a multi-platform station serving and affecting all four fast and slow lines of the 100-125mph WCML, with associated performance and capacity risks to over 500 existing passenger and freight services per day, without any early-stage engagement with Network Rail or wider industry stakeholders, clearly conflicts with the industry guidance (and the conclusions of the reports commissioned by SBC to date). The suggested merits and deliverability of the proposed new station therefore carry little or no weight in the absence of a review and validation by Network Rail and the wider rail industry stakeholders.
- 5.1.6 Based on our experience with the planning and implementation of major rail-related developments, we would have expected to see evidence of the station proposals being worked up to at least Engineering Stage 2 of Network Rail's governance for assessing new projects (Project Acceleration in a Controlled Environment or PACE), backed by a Basic Services Agreement (BSA) between SBC and Network Rail, within which a multi-disciplinary feasibility study would be undertaken jointly by the parties, with Network Rail providing a Commercial Scheme Sponsor to manage the process.
- 5.1.7 A critical initial component in this work would be a capability study, to determine to the satisfaction of Network Rail (and/or the TOCs/FOCs) the ability to path existing passenger services through any new station without importing unacceptable performance risk, as determined by Network Rail through its quality assurance process.
- 5.1.8 In the absence of such engagement, with reference to Network Rail's published guidance for new stations, the following limited conclusions can be drawn:

Table 2 Alignment of Meecebrook station proposals against NR guidance

Guidance	Current status
Greater emphasis is placed on the requirement that schemes be value for money, fit with industry plans, have an affordable whole life cost, and minimise disruption to the operational railway	A good prospect of obtaining an acceptable BCR provided entire development is built Construction and operation would bring disruption to all four WCML running lines
Option selection process to be undertaken	Limited assessment without industry engagement
Engagement with both the local train operating company (TOC) or companies, the Station Facility Owner (SFO) and Network Rail is vital as they can advise the promoter as to the potential operational and financial viability of a proposal for station investment at an early stage;	None to date as confirmed in writing by Network Rail
Enhancement of existing station facilities should generally be the first option considered for station investment as it is likely to minimise disruption and adverse operational impacts on the railway.	Not considered
Consideration should be given to relocating an existing station or the opening of a new station where enhancement does not meet the scheme's objectives or there are additional benefits associated with these options. However, station relocation or the addition of a new station to the network is likely to cause disruption and will only be possible where operational constraints allow	Relocation not considered Proposed addition of a new station Construction and operation would bring disruption to all four WCML running lines
The timescale for construction of a new station is generally, on average, two years from start to finish. Significant time before this is required to develop and approve a proposal	Reports produced in 2022 assume opening in 2026
Any proposed investment needs to demonstrate a positive impact for passengers and the existing railway network. For example, a new station needs to serve a new market and provide links to origins and destinations which would be desirable to potential passengers without substantial disadvantages such as longer journey times for existing passengers. This positive impact should be demonstrated in a WebTag compliant business case;	Limited assessment without industry engagement
Investment proposals must consider government objectives for the relevant route and the Long Term Planning Process (LTPP) which is the rail industry's plan to 2043. Proposals which have impacts conflicting with industry strategy are unlikely to secure industry support	Not referenced in Network Rail's Route Specification No evidence provided on LTPP alignment or other industry strategies
Proposed investment should consider other recent and planned investments in stations and the rail network. A programme of planned investment may provide a good or even a one-off opportunity for coordinated third party investment in station facilities. Conversely, the relocation of a station which has recently seen substantial investment or the opening of a new station on a section of line that has had journey time improvements is unlikely to offer benefit to the railway;	No evidence provided of wider synergies beyond HS2 The new station would be on a section of the WCML which has had substantial journey time improvements in recent years, but without any cognisance or provision for a new station
When station investment is partially or wholly funded by DfT from a ring fenced fund, or is under a commercial framework to administer DfT funding, the investment should be targeted to meet the conditions of that funding. These may include revenue return to the DfT, generation of new revenue streams, passenger satisfaction improvement measurement	Limited assessment without industry engagement

Guidance	Current status
through passenger survey Key Performance Indicators (KPIs) or other specific objectives	
Identify the nature of the local transport challenges being faced	Limited assessment without industry engagement
Identify the nature of the local transport challenges being faced	Limited assessment without industry engagement
Determine the different transport options that could be adopted	Limited assessment without industry engagement
Determine the different transport options that could be adopted	Limited assessment without industry engagement
Understand the existing and future market for rail travel	Limited assessment without industry engagement
Demonstrate why a rail based enhancement is most appropriate as part of a package of enhancements or on its own	Limited assessment without industry engagement
Demonstrate why a rail based enhancement is most appropriate as part of a package of enhancements or on its own	Limited assessment without industry engagement
Evaluate which of the potential options for rail investment is appropriate; consideration should be given to rolling stock and timetabling solutions which for some objectives may offer better value for money than investment in a station	Limited assessment without industry engagement
Consider the impact of the proposed option on the operation of the railway	Limited assessment without industry engagement
Consider how the proposed option fits with industry strategy and objectives.	No assessment
A Train Operating Company (TOC) must support the provision of services to the new station and early engagement with TOCs is essential to any proposal.	No engagement
Without a positive business case a scheme will not be taken forward for consideration by railway industry stakeholders. The railway industry encourages promoters to have early discussions to establish the likely viability of proposals and for guidance in preparing a business case. It is vital that rail industry bodies are consulted as early as possible in the development of a proposal for investment in a station. Network Rail and the relevant TOC(s) will be able to gauge the potential viability of a scheme from the outset. They can also provide specific local advice and guidance on operational considerations which must be taken into account in order to develop a successful proposal, and information on any enhancements or changes to service patterns already planned at the station.	No engagement
Operational and performance issues need to be considered at the inception stage of the project and early engagement with Network Rail and TOCs is recommended to establish scheme feasibility. It is important that a proposal for a new station is developed with cognisance of the current and planned service pattern on the route and of existing infrastructure constraints. Engagement with Network Rail is advisable in these cases as they may be able to provide an early view of forthcoming Route Study recommendations	Limited assessment without industry engagement
Having established whether there is a fit with the industry planning framework, a promoter will also need to form an early view as to the appropriate service pattern at the new	Limited assessment without industry engagement

Guidance	Current status
station. This would include the practicality of stopping all or just some of the existing services at the new station, or of introducing new services to serve the facility. The views of the relevant franchising authority should be sought	
Early engagement with the rail industry is indispensable to ensure that proposals for station enhancements or new stations can be developed successfully. Network Rail's route-based Strategic Planning teams act as the first point of contact for promoters. Where Network Rail is involved in the proposed enhancement, Network Rail's Strategic Planning teams will work with developers and local authorities on the scheme throughout the feasibility processes and planning stages.	None
As the day to day operators of stations, TOCs have invaluable knowledge about the needs of their customers and the issues that need to be addressed. They are a key party to any changes that are proposed and should be involved in any proposal from an early stage.	Limited assessment without industry engagement
Early dialogue with industry parties is essential as they can assist promoters in working through these requirements and in some cases take the lead to ensure that certain requirements are met.	None

5.1.9 As recommended by the Council's own advisers, the merits, deliverability and acceptability of the proposed new station can therefore only be confirmed with proper input from Network Rail, at least up to Engineering Stage 2 of the company's PACE corporate governance for assessing new stations, as well as input from other key stakeholders, including but not limited to:

- Passenger Train Operating Companies (TOCs), not least West Midlands Trains (London Northwestern Railway subsidiary), Avanti West Coast, CrossCountry, Caledonian Sleeper, Locomotive Services, West Coast Railways, Rail Operations Group and SLC Rail Operations;
- Rail Freight Operating Companies (FOCs), namely Colas Rail, DB Cargo, DC Rail, DRS, Freightliner, GB Railfreight and Varamis Rail;
- Rail Delivery Group and the Rail Freight Group;
- Department for Transport;
- Office of Rail & Road.

Appendix

Appendix A Freedom of Information response from Network Rail

Source: https://www.whatdotheyknow.com/request/meecebrook_claims_regarding_new



[REDACTED]

By email: request-906118-c2ae0023@whatdotheyknow.com

Network Rail
Freedom of Information

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

31 October 2022

Dear [REDACTED]

Information request

Reference number: FOI2022/01225

Thank you for your email of 9 October 2022, in which you requested the following information:

Stafford Borough Council is claiming that a new railway station will be built at a proposed garden village called Meecebrook on the West Coast Mainline.

The proposals are significantly scaled back now and exclude the MOD brownfield site that was originally part of the proposals in 2020.

- 1) Please confirm if a new West Coast Mainline station has been agreed.*
- 2) If it has not been agreed, what stage are proposals at?*
- 3) What would be the approximate total cost of a new station?*
- 4) Who would pay for this?*
- 5) Does a new development on greenfield (instead of brownfield) fit with the Network Rail environmental strategy?*

I have processed your request under the terms of the Environmental Information Regulations 2004 (EIR).¹

¹ The EIR, like the Freedom of Information Act 2000 (FOIA), allows people to access information held by public authorities like Network Rail. When people ask for environmental information, we need to consider the request under the EIR rather than the FOIA. In this case, I am of the view that information relating to major infrastructure proposals meets the definition of environmental information at regulation 2(1)(c) of the EIR because it is information about a measure that impacts the environment.

I have consulted colleagues in our Strategic Planning and Sponsorship teams for the West Coast. They have advised me that they do not hold any recorded information that meets your request. This is because Network Rail is currently assessing the potential impact on the network of some new station proposals, but has not carried out any specific assessments of a proposal for Meecebrook.

Please see below for some advice to help address each of your questions:

1) Please confirm if a new West Coast Mainline station has been agreed.

We have not made any agreements relating to a new station at Meecebrook. As mentioned above, our planners are carrying out work to assess the long-term impact of some new station proposals on the West Coast South route, but this work is not looking at developing the case for, or the deliverability of, a new station at Meecebrook in the short-to-medium term.

2) If it has not been agreed, what stage are proposals at?

There are currently no Network Rail proposals for a station at Meecebrook and our planners have advised that they have not been consulted with directly by Stafford Borough Council or Staffordshire County Council on this subject.

3) What would be the approximate total cost of a new station?

We are unable to advise on this point, as Network Rail has not assessed this.

4) Who would pay for this?

Again, we are unable to advise as we do not have any specific proposals for Meecebrook.

5) Does a new development on greenfield (instead of brownfield) fit with the Network Rail environmental strategy?

As we have not been involved in any proposals, this is not something Network Rail has looked at.

You may wish to find out more from Staffordshire County Council about their proposals – contact details are available at: [Contact - Staffordshire County Council](#)

If you have any enquiries about this response, please contact me in the first instance at [REDACTED] Details of your appeal rights are below.

Please remember to quote the reference number at the top of this letter in all future communications.

Yours sincerely

[REDACTED]

You are encouraged to use and re-use the information made available in this response freely and flexibly, with only a few conditions. These are set out in the [Open Government Licence](#) for public sector information. For further information please visit our [website](#).

Appeal rights

If you are unhappy with the way your request has been handled and wish to make a complaint or request a review of our decision, please write to the Compliance and Appeals team at Network Rail, Freedom of Information, [REDACTED] or by email at [REDACTED]. Your request must be submitted within 40 working days of receipt of this letter.

If you are not content with the outcome of the internal review, you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner (ICO) can be contacted at Information Commissioner's Office, [REDACTED] or you can contact the ICO through the 'Make a Complaint' section of their website on this link: <https://ico.org.uk/make-a-complaint/>

The relevant section to select will be "Official or Public Information".

Intermodality

[Redacted]
[Redacted]

Web: www.intermodality.com



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From: Preferred Options Consultation [REDACTED]
Sent: 06 December 2022 15:31
To: Strategic Planning Consultations
Subject: Preferred Options Consultation - Submitted Response

Full name: **paul william shaw**

Email: [REDACTED]

Agents and Developers

Organisation or Company: **aston homes and P W Shaw**

Age: [REDACTED]

Added to database: [REDACTED]

Topics (Contents page): **Vision and Objectives**

Vision and Objectives

Q1 - Which 3 are most important to you? To develop a high value, high skill, innovative and sustainable economy. , To deliver sustainable economic and housing growth to provide income and jobs. and To provide an attractive place to live and work and support strong communities that promote health and wellbeing.

Development Strategy and Climate Change

Q2 - Do you agree with each of the policies in this chapter?

Policy 1 (Development Strategy): **Yes**

Comments: **No reply**

Policy 2 (Settlement Hierarchy): **Yes**

Comments: **The allocations within Stafford are appropriate,sustainable and well thought out and should be adopted within this plan . The allocations at Stone should be added to by way of a small site at Redhill Road Stone sufficient to supply either 31 small homes for affordable/first time units or for a retirement complex and is not linked to large scale development site so it can be provided individually and not be the subject of a negotiation under section 106 agreements. Adding this small allocation would be highly advantageous for this site being sustainable,deliverable and close to the town centre.**

Policy 3 (Development in open countryside): **Yes**

Comments: **No reply**

Policy 4 (Climate change and development requirements): **Yes**

Comments: **No reply**

Policy 5 (Green Belt): **Yes**

Comments: **No reply**

Policy 6 (Neighbourhood plans): **Yes**

Comments: **No reply**

Meecebrook Garden Community

Q3 - Do you agree with proposed new garden community: **Yes**

Comments: **This proposal along with the Stafford and Stone housing allocations are sound**

Site Allocation Policies

Q4 - Do you agree with the proposed allocations?

Policy 9 (North of Stafford): **Yes**

Comments: **No reply**

Policy 10 (West of Stafford): **Yes**

Comments: **No reply**

Policy 11 (Stafford Station Gateway): **Yes**

Comments: **No reply**

Policy 12 (Other housing and employment land): **Yes**

Comments: **The housing allocations within Stafford are sound and appropriate Ash Fats is the most appropriate allocation within Stafford having ticked all the boxes at the last local plan examination. The site is as the inspector commented is sustainable, available and highly appropriate for development. It is the site well sited to provide good overall access and amenity to the borough.**

Site Allocation Policies (continued)

Q5 - Do you agree with the proposed allocations?

Policy 13 (Local Green Space): **Yes**

Comments: **No reply**

Policy 14 (Penk and Sow): **Yes**

Comments: **No reply**

Policy 15 (Stone Countryside): **Yes**

Comments: **No reply**

Economy Policies

Q6 - The local plan seeks to protect previously allocated and designated industrial land and support home working and small-scale employment uses. Do you agree? **Yes**

Comments: No reply

Q7 - The Stafford Borough Plan proposes policies around the town centres uses, agriculture and forestry development, tourism development and canals. Do you agree? **Yes**

Comments: **No reply**

Housing Policies

Q8 - The local plan proposed a policy (23) on affordable housing. Do you agree? **Yes**

Comments: **Affordable housing is a necessary ingredient of this plan and sites should be provided wherever possible**

Q9 - The local plan proposes a policy (30) to help meet identified local need for pitches for Gypsies and Travellers. Do you agree? **No**

Comments: **No reply**

Q10 - The local plan proposes policies around homes for life, rural exception sites, new rural dwellings, replacement dwellings, extension etc. Do you agree? **Yes**

Comments: **There should be provision within the policies to be able housing to be provided across the rural area to accomodate self build units and downsizing units within the villages in tiers below suggested ones ie in the villages within the open countryside. These sites can be provided by local land owners and this type of policy would free up larger homes for larger families whilst providing accomodation for local people not wanting to leave the villages**

Design and Infrastructure Policies

Q11 - Do you agree with policies? **Yes**

Comments: **No reply**

Environment Policies

Q12 - Do you agree with policies? **Yes**

Comments: **No reply**

Connections

Q13 - Do you agree with policies? **Yes**

Comments: **No reply**

Evidence Base

Q14 - Have we considered all relevant studies and reports? **Yes**

Comments: **No reply**

Q15 - Do you think there is any further evidence required? **No**

Comments: **No reply**

General Comments:

This is in my experience one of the best constructed local plans i have seen bing well evidenced and comprehensive. I feel it is sound in all aspects.

From: Hiden, Gemma (Avison Young - UK) [REDACTED]
Sent: 08 December 2022 13:20
To: Strategic Planning Consultations
Cc: [REDACTED]
Subject: Hitachi Energy UK - Representations to the Preferred Options Consultation
Attachments: Preferred-Options-Consultation-Response-Form Hitachi Energy UK Ltd r1.pdf

Good afternoon

Please find attached representations to the Stafford Borough Local Plan 2020-2040 Preferred Options Consultation, submitted on behalf of our Client Hitachi Energy UK.

Our Client owns the Stonefield Works site in Stone, which is currently subject to a live planning application for residential uses, and is suitable and available to be allocated for residential.

We would be pleased to discuss this with you if you have any particular queries.

Please could you confirm receipt of the attached?

Many thanks
Gemma

Gemma Hiden MRTPI
Associate
Planning, Development and Regeneration

[REDACTED] | avisonyoung.co.uk

[REDACTED]

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The Preferred Options is a full draft of the local plan. It includes draft policies, and sets out proposed sites where new homes, jobs and other facilities could be located.

The Preferred Options is subject to consultation, and we want to hear your views. The consultation will run from Monday 24 October 2022 until 12 noon on Monday 12 December 2022.

Contact Details

Full name (required): Gemma Hiden

Email (required): 

Tick the box that is relevant to you (required):

- Statutory Bodies and Stakeholders
- Agents and Developers
- Residents and General Public
- Prefer not to say

Organisation or Company Name (if applicable):

Hitachi Energy UK Limited

Tick the box that is relevant to you:

(This is a non-mandatory question but helps us understand the demographic of our respondents.)

- Under 18
- 18-24
- 25-34
- 35-44
- 45-54
- 55-64
- 65+

Prefer not to say / not applicable

Do you want to be added to our Local Plan consultation database to be notified about future local plan updates?



Contents

The Local Plan Preferred Options includes the topics listed below.

Each topic has a series of standard questions in order for you to provide a response. You do not have to respond to each of the topics or answer all of the questions. The page numbers below relate to the page the topic starts in this consultation form.

- **Vision and Objectives** - page 5
- **Development Strategy and Climate Change Response** - page 6
- **Meecebrook Garden Community** - page 9
- **Site Allocation Policies** - page 10
- **Economy Policies** - page 14
- **Housing Policies** - page 16
- **Design and Infrastructure Policies** - page 18
- **Environment Policies** - page 19
- **Connections** - page 20
- **Evidence Base** - page 21
- **General Comments** - page 22

All of the local plan documents and the Local Plan 2020-2040: Preferred Options document are available here: <https://www.staffordbc.gov.uk/local-plan>

Vision and Objectives

Q1. There are eight objectives for the local plan to achieve the vision of:

"A prosperous and attractive borough with strong communities."

Of the following objectives which 3 are the most important to you?

Please make your choice from the list of objectives below. (Maximum of 3 to be selected)

Local Plan Preferred Options document reference: Page 12

- Contribute to Stafford Borough being net zero carbon by ensuring that development mitigates and adapts to climate change and is future proof.
- To develop a high value, high skill, innovative and sustainable economy.
- To strengthen our town centres through a quality environment and flexible mix of uses.
- To deliver sustainable economic and housing growth to provide income and jobs.
- To deliver infrastructure led growth supported by accessible services and facilities.
- To provide an attractive place to live and work and support strong communities that promote health and wellbeing.
- To increase and enhance green and blue infrastructure in the borough and to enable greater access to it while improving the natural environment and biodiversity.
- To secure high-quality design.

Development Strategy and Climate Change Response

Q2. The development strategy and climate change response chapter includes the policies below.

Do you agree with each of the policies in this chapter?

Select Yes or No for each of the policies and then use the box below each policy to add additional comments.

Ensure any comments relate to the policy comment box you are completing.

Local Plan Preferred Options document reference: Pages 19 to 40

Policy 1. Development strategy (which includes the total number of houses and amount of employment land to be allocated and the Stafford and Stone settlement strategies)

Yes / No

Policy 1 Comments:

We consider that the overall quantum of housing and employment land provision set out within Policy 1 over the Plan period is broadly acceptable. However, we do have concerns about the overreliance the development strategy places on the delivery of the garden city at Meecebrook in delivering 3,000 homes. This represents 54.2% of the Council's supply over the Plan period, which seems unrealistic.

The Council's Lead in and Build Rate Assumptions Topic Paper recognises that the lead-in times for large scale developments such of this are significant and that for this reason, Meecebrook will not begin to start delivering any housing until 2030, at which point it would deliver an ambitious 300 dwellings per year. Indeed, Draft Policy 7, section L, confirms that development will only be able to commence on site once a route to securing funding and delivery for a railway station, schools and necessary infrastructure, has been agreed. If this funding and proposals for these infrastructure elements are not already in place, then delivery of the first houses in just over 7 years seems precariously ambitious.

Any slippage to the lead in time and delivery rates for this site would significantly impact on the Council's total housing delivery over the plan period and therefore greater flexibility needs to be built into the Plan's development strategy to deal with this.

There are a number of studies that have been published to assess the delivery of large scale housing sites (Sustainable Urban Extensions, Strategic Development Areas etc). Savills published a report assessing the delivery rates of urban extensions in October 2014. The report considers how long it takes for a sustainable urban extension (SUE) to progress through the planning system and rates of delivery once construction has begun. It concludes that, on average, an SUE starts construction on the first phase of housing more than four years after the submission of an outline planning application. In terms of delivery rates, analysis suggests an anticipated delivery of 60 units in the first year, 100 units per annum in subsequent years and then at a consistent level of around 120 units. The build out rate of each site will, of course, depend on local circumstances. For instance, there are examples in the south of England where delivery rates have exceeded 120 units per annum.

Nathaniel Lichfield and Partners (Lichfields) published its findings on how quickly large-scale housing sites deliver in November 2016. The report concludes that the average lead in time for large sites (over 500 units) prior to the submission of the first planning application was 3.9 years, while it took on average 5 years for planning approval to be secured. With respect to sites of up to 1,499 units, the report concluded that average delivery rates barely exceed 100 units per annum. There were no examples within this category which reached a rate of 200 homes per annum, let alone the 300 dwellings per annum the Council is expecting the Meecebrook site to deliver.

The Government produced an independent review of build out rates (draft analysis) in June 2018. This was prepared by Sir Oliver Letwin MP. He found that the median build-out time period for these sites was 15 years, with a median of 6.5% of the site built out each year.

All of the above studies are noteworthy. However, they are not without their shortcomings. Principally, the averages are taken from sites around the country where different economic circumstances can influence results. For instance, SUEs in the south-east are more likely to have greater build out rates due to the local market than a site in the north-east, for example.

Avison Young has undertaken an assessment of the lead in times on major development sites in the Midlands, which includes an analysis of all major housing developments promoted through the Local Plan process in since the mid 1990's (that is all 500+ unit schemes). The results of this study are perhaps more pertinent to the proposed SUE in Stafford Borough.

The Avison Young study examined a total of 17 developments. The data indicates that it takes on average:

- 5.6 years to get from first contemplation to the submission of an application for planning permission;
- 21 months, from validation of an application for planning permission to secure a resolution to grant permission;
- 23 months to negotiate and complete a S106 Agreement;
- 31 months to get from the submission of the first Reserved Matters or from the submission of the first application to discharge conditions, to having in place all the planning approvals the developer needs to make a start on site (this does not include 'technical approvals' required from, say, the highways and drainage authorities); and,
- (based on actual 'opening up' data, or predictions given by developers) 19 months to get from making a start on site to constructing the first dwelling.

So, in total, around 13 years from first contemplation to commencement of development and the delivery of housing.

Whilst our Client supports the authority's approach of including an allowance for flexibility / resilience in its development strategy, in its view the degree of flexibility / resilience currently built in to its preferred development strategy is woefully inadequate. It is firmly of the view that the figure of 10% is far too low and that it would therefore be more appropriate to allow for a much higher figure (at least 20% as recommended in the Local Plans Expert Group Report which was published in 2016) given the concerns it has about the overly optimistic assumptions that the Authority is making about the lead in times and delivery rates from its large sites. In our view Council should therefore apply a 20% buffer to the overall housing requirement to allow for more realistic delivery from the SUEs and from those proposed allocations in the emerging Plan where their deliverability is uncertain. There is no evidence to suggest that including a greater allowance for flexibility / resilience in the development strategy would give rise to any unacceptable adverse impacts.

A further way in which the Council could achieve this flexibility is by redistributing a greater proportion of its higher order towns, such as Stone. Stone is the second principal town in the Borough and is an established settlement, with good transport links, including its own train station. Currently only 7% of the Plan's housing requirement is expected to be met on sites in and around Stone despite it being the second largest settlement in the Borough.

Our Client's site at Stonefield Works in Stone is a brownfield site which could contribute up to 130 dwellings towards housing delivery within Stone, within a five year period. We consider this further under question 4 below.

Policy 2. Settlement Hierarchy (Tier 1: Stafford, Tier 2: Stone, Tier 3: Meecebrook, Tier 4: Larger settlements, Tier 5: Smaller settlements)

Yes / No

Policy 2 Comments:

Policy 2 notes that the scale of new development will be commensurate with the position of the settlement in the settlement hierarchy. However as set out in our response to Policy 1 Stone is the second largest town in the Borough, yet it is only expected to accommodate 7% of the Borough's total housing requirement.

Policy 2 should be amended to that it provides specific support to the re-use of brownfield land within and adjacent to existing settlements, in accordance with NPPF Paragraph 119. Whilst this text is included at paragraph 2.3, it should be explicit within the Policy for the avoidance of doubt.

Policy 3. Development in the open countryside - general principles

Yes / No

Policy 3 Comments:

Policy 4. Climate change development requirements

Yes / No

Policy 4 Comments:

Policy 5. Green Belt

Yes / No

Policy 5 Comments

Policy 6. Neighbourhood plans

Yes / No

Policy 6 Comments:

Meecebrook Garden Community

Q3. The local plan proposes a new garden community called Meecebrook close to Cold Meece and Yarnfield. This new community is proposed to deliver housing, employment allocations, community facilities, including new schools, sport provision and health care facilities, retail and transport provision, which includes a new railway station on the West Coast Main Line, and high quality transport routes.

Do you agree with the proposed new garden community?

Yes / No

Explain your reasoning and add any evidence to justify your response.

Ensure any comments relate to the policy comment box you are completing.

Local Plan Preferred Options document reference: Pages 41 to 45

Comments:

Site Allocation Policies

Q4. The Stafford Borough Local Plan 2020 - 2040 proposes allocations for both housing and employment to meet the established identified need.

The site allocation policies chapter includes the policies below for housing and employment allocations.

Do you agree with the proposed allocations?

Select Yes or No for each of the following policies and then use the box below each policy to add additional comments.

Explain your reasoning and add any evidence to justify your response. Please provide details of alternative locations for housing and employment growth if you consider this is appropriate.

Ensure any comments relate to the policy comment box you are completing.

If you do want to submit a new site for consideration through the local plan process, we are still accepting sites through the Call for Site process, details are available here: <https://www.staffordbc.gov.uk/call-sites-including-brownfield-land-consultation>

Local Plan Preferred Options document reference: Pages 47 to 56 and appendix 2.

Policy 9. North of Stafford

Yes / No

Policy 9 Comments:

Policy 10. West of Stafford

Yes / No

Policy 10 Comments:

Policy 11. Stafford Station Gateway

Yes / No

Policy 11 Comments:

Policy 12. Other housing and employment land allocations.

(In your response, please specify which particular site you are referring to, if relevant.)

Yes / No

Policy 12 Comments:

We consider that Policy 12 is unsound as it fails to allocate our Client's site. The site is located at Stonefield Works, Stone and comprises 4 hectares of brownfield land that is suitable, available and achievable for residential use. The site is currently shown as white land on the draft Policies Map.

Hitachi has made it known to the LPA that they are looking to vacate the Stonefield works site in mid-2024 and that the site is surplus to requirements, such that it will be available for redevelopment.

The site has been formally marketed by Avison Young's industrial team for retention in industrial use. That marketing process demonstrated that there was no demand for the site for industrial use, and no formal offers were put forward during the tender process. The site is not considered to be suitable for modern industrial users given poor HGV access, the existing state of disrepair of many of the buildings, and that the site is a non-conforming use within a residential area which raises amenity concerns for industrial or commercial end users. Accordingly, the site will need to be redeveloped for an alternative use. Marketing to date has shown interest in the site from developers is predominantly limited to residential use.

As a result of the marketing undertaken, Avison Young submitted an application for outline planning permission in July 2022 (LPA reference 22/36231/OUT).

The application seeks outline planning permission for demolition of all the buildings on site and redevelopment for up to 130 dwellings, including affordable homes, with vehicular access, public open space and associated infrastructure.

The application is supported by various technical documents which demonstrate that the site is technically achievable, and importantly we note that there are no objections from highways, ecology, arboriculture, education, environmental health or affordable housing. The site is a brownfield site within the settlement boundary of Stone, within walking distance of the town centre and the train station. The site is therefore a sustainable, brownfield location, towards which development should be directed. The site is therefore suitable for development.

Hitachi is not a housebuilder and therefore it is their intention on achieving a consent on the site, to sell the site to a housebuilder to bring forward as quickly as possible. The site is therefore available.

Allocating the site for residential development would recognise that there is no demand for the site for industrial use and that the buildings are no longer fit for purpose. The live planning application demonstrates that the site is technically achievable, feasible and capable of being brought forward for housing development within a reasonable time period. Unlike the larger SUEs the site is reasonably sized and is capable of contributing towards the Council's housing land supply quickly.

Separately, we note that on the Council's interactive mapping part of the site is erroneously shown as being adopted green infrastructure. This is not replicated on the pdf Policies Map. The part of the site shown is currently utilised for hardstanding and buildings on private land, therefore we presume that this is a cartographic error. However, the interactive map should be updated to avoid confusion.

Q5. The Stafford Borough Local Plan 2020 - 2040 proposes to allocate land for Local Green Space and Countryside Enhancement Areas throughout the borough.

The policies which relate to these proposals are listed below.

Do you agree with the proposed allocations?

Select yes or no for each of the policies and then use the box below each policy to add additional comments.

Explain your reasoning and add any evidence to justify your response.

Ensure any comments relate to the policy comment box you are completing.

Local Plan Preferred Options document reference: Pages 56 to 59 and appendix 2.

Policy 13. Local Green Space

(In your response, please specify which particular site you are referring to, if relevant)

Yes / No

Policy 13 Comments:

Policy 14. Penk and Sow Countryside Enhancement Area (Stafford Town)

Yes / No

Policy 14 Comments:

Policy 15. Stone Countryside Enhancement Area

Yes / No

Policy 15 Comments:

Economy Policies

The Economy Policies chapter contains policies that seek to protect employment land and support economic growth within the Borough.

Q6. The local plan seeks to protect previously allocated and designated industrial land and support home working and small-scale employment uses.

The relevant policies are: 16, 17 and 18.

Do you agree with these policies?

Yes / No

Select Yes or No and then use the box to add additional comments. If referring to a specific policy, please include the policy number.

Explain your reasoning and add any evidence to justify your response.

Ensure any comments relate to the policy comment box you are completing.

Local Plan Preferred Options document reference: pages 61 to 65

Comments:

Q7. The Stafford Borough Plan proposes policies around the town centres uses, agriculture and forestry development, tourism development and canals.

The relevant policies are: 19, 20, 21 and 22.

Do you agree with these policies?

Yes / No

Select Yes or No and then use the box below to add additional comments. If referring to a specific policy, please include the policy number.

Explain your reasoning and add any evidence to justify your response.

Ensure any comments relate to the policy comment box you are completing.

Local Plan Preferred Options document reference: pages 65 to 71

Comments:

Housing Policies

The Housing Policies chapter contains policies that seek to provide for identified need across the borough and support houseowners.

Q8. The local plan proposed a policy (Policy 23) on affordable housing.

Do you agree with this policy?

Yes / No

Select yes or no and then use the box below to add additional comments.

Explain your reasoning and add any evidence to justify your response.

Ensure any comments relate to the policy comment box you are completing.

Local Plan Preferred Options document reference: pages 74 to 76

Comments:

We are supportive of the affordable housing policy.

We would suggest, however, that the policy includes a viability clause as this may be required in some development scenarios. We would also suggest that in respect of paragraph F on tenure mix, additional text is added to provide future flexibility e.g. "*or as per the Council's latest adopted evidence base /supplementary guidance on tenure mix*". Such flexibility might be required for example should the focus of affordable homes move away from First Homes or should future evidence base suggest a different percentage tenure mix.

Q9. The local plan proposes a policy (Policy 30) to help meet identified local need for pitches for Gypsies and Travellers. There are 2 new proposed sites; one near Hopton and the other near Weston.

Do you agree with this policy?

Yes / No

Select yes or no and then use the box below to add additional comments. In your response, please specify which particular site you are referring to, if relevant.

Explain your reasoning and add any evidence to justify your response.

Ensure any comments relate to the policy comment box you are completing.

Local Plan Preferred Options document reference: pages 84 to 86

Comments:

Q10. The local plan proposes policies around homes for life, rural exception sites, new rural dwellings, replacement dwellings, extension of dwellings, residential subdivision and conversion, housing mix and density, residential amenity and extension to the curtilage of a dwelling.

The relevant policies are: 24, 26, 27, 28, 29, 21, 31, 32 and 33.

Do you agree with these policies?**Yes / No**

Select yes or no and then use the box below to add additional comments. If referring to a specific policy, please include the policy number.

Explain your reasoning and add any evidence to justify your response.

Ensure any comments relate to the policy comment box you are completing.

Local Plan Preferred Options document reference: pages 73 to 89

Comments:

Design and Infrastructure Policies

Q11. The design and infrastructure chapter contains policies on urban design general principles, architectural and landscape design, infrastructure to support new development, electronic communications, protecting community facilities and renewable and low carbon energy.

The relevant policies are: 34, 25, 36, 37, 38, 39 and 40.

Do you agree with these policies?**Yes / No**

Select yes or no and then use the box below to add additional comments. If referring to a specific policy, please include the policy number.

Explain your reasoning and add any evidence to justify your response.

Ensure any comments relate to the policy comment box you are completing.

Local Plan Preferred Options document reference: Pages 91 to 99.

Comments:

Environment Policies

Q12. The environment policies chapter contains policies on the historic environment, flood risk, sustainable drainage, landscapes, Cannock Chase Area of Outstanding Natural Beauty (AONB), Green and blue infrastructure

network, biodiversity, Special Areas of Conservation (SAC), Trees, Pollution and Air Quality.

The relevant policies are: 31, 42, 43, 44, 45, 46, 47, 48, 49, 50 and 51.

Do you agree with these policies?

Yes / No **General Comments**

Select yes or no and then use the box below to add additional comments. If referring to a specific policy, please include the policy number.

Explain your reasoning and add any evidence to justify your response.

Ensure any comments relate to the policy comment box you are completing.

Local Plan Preferred Options document reference: Pages 101 to 119.

Comments:

As set out under question 4, part of the site is erroneously designated as adopted green infrastructure, when the site is in private use and comprises buildings and hardstanding.

In respect of Policy 46, we note reference to the provision of on-site and off-site open space and sport provision. No reference is made in the Policy to the CIL tests in ensuring that the contributions sought are necessary, directly related to the development, and fair and reasonably related in scale and kind to the development. Setting minimum thresholds does not account for these nuances and therefore we consider the policy text should be amended to include reference to the CIL tests for clarity.

Connections

Q13. The connections policies chapter contains policies on transport and parking standards.

The relevant policies are: 52 and 53

Do you agree with these policies?

Yes / No

Select yes or no and then use the box below to add additional comments. If referring to a specific policy, please include the policy number.

Explain your reasoning and add any evidence to justify your response.

Ensure any comments relate to the policy comment box you are completing.

Local Plan Preferred Options document reference: Pages 121 to 124.

Comments:

Evidence Base

To support the Local Plan 2020-2040 an evidence base has been produced.

The evidence base is available to view on our website here:

www.staffordbc.gov.uk/new-lp-2020-2040-evidence-base

Q14. Have we considered all relevant studies and reports as part of our local plan?

Yes / No

Select yes or no and then use the box below to add additional comments.

Explain your reasoning and add any evidence to justify your response.

Ensure any comments relate to the policy comment box you are completing.

Comments:

Q15. Do you think there is any further evidence required?

Yes / No

Select yes or no and then use the box below to add additional comments.

If you think additional evidence is needed, please state what you think should be added and explain your reasoning.

Ensure any comments relate to the policy comment box you are completing.

Comments:

The Council's SHELAA 2022 Update does not consider our Client's site at Stonefield Works, Stone, which should be considered.

As set out under question 4 above, the site is a brownfield site within the settlement boundary of Stone and is soon to be surplus to Hitachi's requirements. The site is therefore available.

A planning application is currently pending determination on the site for residential development of up to 130 dwellings. The application demonstrates that the site is technically achievable, and that the site is suitable for residential development, inkeeping with the character of the surrounding area and within a sustainable location for development.

General Comments

If you have any further comments to make on the Local Plan Preferred Options document and evidence base, please use the box below.

If you need further space to add comments, please add pages to the end of the consultation form and reference which question you are answering.

Thank you for taking the time to complete this consultation form.

Completed forms can be submitted by email to:
strategicplanningconsultations@staffordbc.gov.uk

Or returned via post to: Strategic Planning and Placemaking, Stafford Borough Council, Civic Centre, Riverside, Stafford, ST16 3AQ

The consultation closes at 12 noon on Monday 12 December 2022, comments received after this date may not be considered.

From: Kharade, James (Avison Young - UK)
Sent: 12 December 2022 09:23
To: Strategic Planning Consultations
Cc:
Subject: Representation to Preferred Options Consultation - Shaws Lane, Eccleshall - Taylor Wimpey
Attachments: 2022-12-12 - Shaws Lane, Eccleshall- TW Reps to Stafford BC Preferred Options.pdf

Dear Sir/Madam,

On behalf of Taylor Wimpey, please find attached formal representations in response to the Council's Local Plan 2020-2040 Preferred Options consultation made in respect of land at Shaws' Lane, Eccleshall. I have attached the representations which detail Taylor Wimpey's full response to the consultation.

Please can you confirm in writing receipt of this email and that the document attached will be considered as part of the Council's Local Plan 2020-2040 Preferred Options consultation.

Please note that these representations should be considered separate to the reps submitted on Friday on behalf of TW, which was in relation to their site at Marlborough Road in Stone.

Any issues, please let me know.

Kind regards,

James Kharade
Graduate Planner

AVISON

From: Preferred Options Consultation [REDACTED]
Sent: 12 December 2022 11:57
To: Strategic Planning Consultations
Subject: Preferred Options Consultation - Submitted Response

Full name: **James Kharade**

Email: [REDACTED]

Agents and Developers

Organisation or Company: **Avison Young**

Age: **No reply**

Added to database: [REDACTED]

Topics (Contents page): **Development Strategy and Climate Change Response**

Vision and Objectives

Q1 - Which 3 are most important to you? Not asked

Development Strategy and Climate Change

Q2 - Do you agree with each of the policies in this chapter?

Policy 1 (Development Strategy): **No**

Comments: The annual housing target should be increased to a minimum of 800 dwellings per year. Taylor Wimpey object to the delivery trajectory and maintains that Meecebrook will not deliver as many homes within the first 10 years of the Plan period as is projected. Please see the accompanying letter submitted on 12/12/2022 for further information.

Policy 2 (Settlement Hierarchy): **Yes**

Comments: Taylor Wimpey broadly supports the proposed settlement hierarchy established in Policy 2, including Eccleshall's designation as a Tier 4 – Larger Settlement. This confirms that the village is a sustainable location for new housing development. However, Taylor Wimpey is concerned that no new housing is proposed in Eccleshall, despite its suitability. Please see the accompanying letter submitted on 12/12/2022 for further information.

Policy 3 (Development in open countryside): **No reply**

Comments: **No reply**

Policy 4 (Climate change and development requirements): **No reply**

Comments: **No reply**

Policy 5 (Green Belt): **No reply**

Comments: **No reply**

Policy 6 (Neighbourhood plans): **No reply**

Comments: **No reply**

Meecebrook Garden Community

Q3 - Do you agree with proposed new garden community: **No**

Comments: **The latest version of the Local Development Scheme (LDS) suggests that the new plan for Stafford will be adopted in late 2024. This leaves only six years between the adoption of the plan and the delivery of the first 300 homes at the settlement. We conclude that this is unrealistic. There are numerous town planning, land and funding milestones to achieve before new homes are delivered at Meecebrook. Furthermore, the trajectory proposes that the site will go from delivering no homes to 300 homes in the space of a year. This does not reflect patterns of housing delivery in the UK market. Typically, we would expect a site like Meecebrook to deliver, say, a maximum of 50 dwellings in the first year, and for annual delivery to increase year on year as a community forms and market demand increases. For further information, please refer to the accompanying letter submitted 12/12/2022.**

Site Allocation Policies

Q4 - Do you agree with the proposed allocations?

Policy 9 (North of Stafford): **No reply**

Comments: **No reply**

Policy 10 (West of Stafford): **No reply**

Comments: **No reply**

Policy 11 (Stafford Station Gateway): **No reply**

Comments: **No reply**

Policy 12 (Other housing and employment land): **No reply**

Comments: **No reply**

Site Allocation Policies (continued)

Q5 - Do you agree with the proposed allocations?

Policy 13 (Local Green Space): **No reply**

Comments: **No reply**

Policy 14 (Penk and Sow): **No reply**

Comments: **No reply**

Policy 15 (Stone Countryside): **No reply**

Comments: **No reply**

Economy Policies

Q6 - The local plan seeks to protect previously allocated and designated industrial land and support home working and small-scale employment uses. Do you agree? **No reply**

Comments: No reply

Q7 - The Stafford Borough Plan proposes policies around the town centres uses, agriculture and forestry development, tourism development and canals. Do you agree? **No reply**

Comments: **No reply**

Housing Policies

Q8 - The local plan proposed a policy (23) on affordable housing. Do you agree? **No reply**

Comments: **No reply**

Q9 - The local plan proposes a policy (30) to help meet identified local need for pitches for Gypsies and Travellers. Do you agree? **No reply**

Comments: **No reply**

Q10 - The local plan proposes policies around homes for life, rural exception sites, new rural dwellings, replacement dwellings, extension etc. Do you agree? **No reply**

Comments: **No reply**

Design and Infrastructure Policies

Q11 - Do you agree with policies? **No reply**

Comments: **No reply**

Environment Policies

Q12 - Do you agree with policies? **No reply**

Comments: **No reply**

Connections

Q13 - Do you agree with policies? **No reply**

Comments: **No reply**

Evidence Base

Q14 - Have we considered all relevant studies and reports? **No reply**

Comments: **No reply**

Q15 - Do you think there is any further evidence required? **Yes**

Comments: **The Council has not robustly evidenced its cross boundary growth figure of 2,000 dwellings. Significant changes have taken place in the wider housing market area, including the breakdown of a joint planning exercise between the four Black Country authorities. Individual Black Country authorities now have to prepare their own Plans which obliges them to fulfil the duty to co-operate on an individual basis rather than as part of a sub-regional conglomerate.**

General Comments:

Taylor Wimpey maintains that the overall housing target for the Borough is too small and should be increased. Furthermore, Taylor Wimpey maintains that Meecebrook will not deliver the homes identified in the first 10 years of the Council's proposed housing trajectory. In view of this, additional land must be allocated for housing in the first 10 years of the Plan. The evidence provided in our supporting letter dated 12/12/2022 considers the suitability of Eccleshall as a broad location for new housing growth. We conclude that Eccleshall is a highly sustainable location and should make a significant contribution towards the housing needs of the Borough. The reason for discounting Eccleshall as a growth location relates solely to education provision. Various documents prepared by the County Council maintain that provision cannot be increased to meet additional demands arising from new housing. Taylor Wimpey maintain that this conclusion is incorrect. Detailed information on pupil places to schools in the two schools which serve the Eccleshall catchment area are included in our supporting information submitted 12/12/2022. This demonstrates that any education capacity issues could be overcome easily, as is common practice, in association with the grant of planning permission for new housing. Taylor Wimpey maintains that the land north of Shaws' Lane is the most sustainable location for new housing development in Eccleshall, due to its very close proximity to the primary school and other amenities in the village. All technical matters considered as part of the Council's site selection process have been addressed. Taylor Wimpey request that Policy 12 be amended to include the proposed allocation for 206 homes on land to the north of Shaws' Lane, Eccleshall. We have provided the reps directly to the strategicplanningconsultations@staffordbc.gov.uk inbox.



Shaws' Lane, Eccleshall

Representations to Stafford Borough Council Local Plan
2020-2040 Preferred Options Consultation

December 2022

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Report title: Representations to Stafford Borough Council Local Plan 2020-2040 Preferred Options Consultation

Prepared by: James Kharade (Graduate Planner)

Contributors: Robert Gardner (Director)

Status: Draft

For and on behalf of Avison Young (UK) Limited

1. Introduction

- 1.1 Avison Young (AY) is instructed by Taylor Wimpey UK Limited (Taylor Wimpey) (“the client”) to submit written representations in respect of Stafford Borough Council’s Local Plan 2020/2040 “Preferred Options” consultation.
- 1.2 Taylor Wimpey controls land to the north of Shaws’ Lane, Eccleshall and is promoting it for residential development. We previously submitted information to the Council on behalf of Taylor Wimpey in response to the Council’s “Call for Sites” process. The purpose of these representations is to identify shortcoming in the emerging Local Plan and identify how these could be addressed. We also wish to reaffirm Taylor Wimpey’s commitment to pursue residential development on the site.
- 1.3 The land to the north of Shaws’ Lane, Eccleshall, presents an exciting opportunity to deliver a sustainable and attractive urban extension to the west of the settlement which can deliver homes to help meet the needs of the local community. Situated in a highly sustainable location with high levels of connectivity to nearby services and facilities, the Site can deliver around 206 new homes forming a new community that will be based upon sustainable and healthy lifestyles and designed for climate resilience and adaptation.
- 1.4 The benefits of the scheme include the following:
- Provide a logical, appropriately scaled, extension to Eccleshall;
 - Create a new area of parkland within the village for use by all residents;
 - Create a safe, suitable and desirable footpath link between Church Street to the South and the primary school and community centre to the north;
 - Deliver enhancements to the Conservation Area through the replacement of arable farmland with parkland;
 - Provide a network of smaller, attractive and accessible green spaces which create opportunities for recreation, while offering the potential to improve access to existing local open spaces and the wider public footpath network;
 - Respect site character by sensitively retaining existing trees and hedgerows; using these to create a sense of maturity to the new residential extension;
 - Supplement retained landscape features with new tree and hedgerow planting, areas of wildflower grassland, ponds and swales to maximise the biodiversity value of the site;
 - Approximately 206 high quality market and affordable homes, providing a wide variety of house types and tenures to suit a wide range of households looking to start on the housing ladder, buy a family home or downsize encouraging social cohesion by providing the opportunity for residents to stay in Stone and maintain friendships and family networks
 - Sensitively relate to adjacent residential areas through considered building orientation and roof heights; and
 - Ensure the creation of a desirable place to live with a safe and attractive environment that builds upon the strength of the local community.

2. Site Background and Context

Site Description and Background

- 2.1 The site is irregularly shaped, comprising of five large agricultural fields immediately to the west of Eccleshall and adjoining the edge of the village settlement boundary. The land is dissected by hedgerows and there are a number of trees located centrally within it. There are hedges and a number of trees around the perimeter.
- 2.2 Immediately to the north west of the site are gardens associated with residential properties along Kerry Lane. To the north east are a number of residential dwellings along Church Street. Further to the north, beyond Church Street, is Holy Trinity Church and Eccleshall Cricket Club.
- 2.3 The eastern boundary is wholly adjacent to the existing residential development and urban edge of Eccleshall.
- 2.4 The south of the site is bound by Shaws’ Lane. Beyond this are the Eccleshall allotments and agricultural fields. A number of residential properties are located to the south west of the site on the crossroad of Shaws’ Lane and Kerry Lane.
- 2.5 The total area of the site is approximately 11 hectares, albeit development is proposed on approximately five hectares only. The land is adjacent to a parcel of recently completed development.
- 2.6 An illustrative masterplan has been prepared which demonstrates how the site could be developed in the future. Development is proposed on the south western half of the site only. The site has a capacity of approximately 185 dwellings at a density of just over 36 dwellings per hectare.
- 2.7 There is limited planning history on the site. The land was promoted through Stafford Borough Council’s ‘Scoping for Issues’ consultation in 2018 and ‘Issues and Options’ consultation in 2020.
- 2.8 Taylor Wimpey has full control over the land and is committed to working in consultation and partnership with local communities and stakeholders to deliver a high-quality residential scheme on the urban edge of Eccleshall which reflects local values and circumstances.

3. Strategic Policies

Policy 1 – Development Strategy

- 3.1 The policy proposes a total housing target of 10,700 new homes between 2020 to 2040. This works out at 535 new homes each year. Further information on this target is contained within the *“Housing and Employment Land Numbers Topic Paper”* (Preferred Options Stage).
- 3.2 The topic paper confirms that the annual target is derived from meeting the Borough’s own housing need of 435 dwellings per annum, based on a scenario derived from the Economic and Housing Needs Assessment, plus 100 homes per year (2,000 in total over the plan period) to meet unmet need in adjoining Housing Market Areas.
- 3.3 The figure of 2,000 dwellings to meet unmet need elsewhere appears to be arbitrary.
- 3.4 Taylor Wimpey instructed IcenI to review the Economic and Housing Development Needs Assessment (EHDNA) prepared for Stafford Borough Council by Lichfields. IcenI has prepared a detailed technical

note which sets out its analysis of the EHND and the various demographic and economic scenarios presented by it. A copy of this note is provided at **Appendix 1**.

- 3.5 In summary, IcenI considers that there is a strong case for considering higher levels of housing need than the standard method in order to meet the Borough’s affordable housing need, which IcenI consider has been under-estimated. Furthermore, IcenI considers that the economic scenarios tested by Lichfields significantly underestimate the potential scale of jobs growth in the Borough in the plan period. The Lichfield’s estimates ignore employment growth generated by HS2, the proposed new community at Meecebrook and the new relief road.
- 3.6 IcenI has, therefore, modelled an alternative scenario which would support the creation of approximately 17,000 jobs in the plan period and which would result in a housing need figure of between 750 and 870 dwellings per annum, depending on assumptions relating to commuting patterns. These figures would also be more consistent with average housing delivery rates in the Borough over the last five years (i.e. 737 dpa) than the standard method.
- 3.7 Notwithstanding the above, IcenI consider that there is further analysis to be undertaken including in relation to the economic growth potential and associated housing need as the Plan progresses further.
- 3.8 It is also important to note that significant changes have taken place in the subregion which are not reflected in the Council’s housing target. A significant element of housing growth in Stafford will be due to migration into the Borough, principally from the Birmingham / Black Country Housing Market Area to the south and the Stoke on Trent / Newcastle Under Lyme Housing Market Area to the north.
- 3.9 Birmingham City Council has significant unmet housing need (approximately 30,000 homes) and has an established policy of seeking assistance from its neighbours in the delivery of these. The City Council has recently begun work on the replacement for the Birmingham Development Plan and this process is ongoing.
- 3.10 The Black Country Authorities also face significant housing needs which they are unable to meet within their own boundaries without significant release of land from the Green Belt. The four Black Country authorities previously agreed to prepare a joint Development Plan which considered housing needs “in the round” across the sub-region. The document also considered the duty to cooperate with adjoining authorities on a collective basis.
- 3.11 The joint planning approach the Black Country authorities had previously taken has recently been abandoned. The individual authorities, including the two closest to Stafford Borough - Walsall and Wolverhampton are now tasked with preparing plans individually. These plans are likely to request assistance in the delivery of new housing from the adjoining South Staffordshire Borough Council, which in turn is likely to request assistance from Stafford Borough.
- 3.12 Local planning authorities are obliged to at least consider a review of their Local Plans every five years. This means that the effects of changes in housing land supply and policy in neighbouring and related areas in the same housing market have an almost immediate influence on other LPAs.
- 3.13 We conclude that significant uncertainty around cross boundary growth issues has been caused by the breakdown of the Black Country Joint Plan preparation process and that this post dates Stafford Borough Councils considerations of what might be an appropriate cross boundary contribution towards unmet housing need outside its boundaries. We suggest that the figure should be evidenced properly, based on a robust duty to cooperate between neighbouring authorities as opposed to the identified arbitrary figure.

- 3.14 In summary, Taylor Wimpey maintains that the overall housing target identified in Policy 1 is too low and should be increased to at least 800 dwellings per annum
- 3.15 Policy 1 also considers the broad distribution of new housing and the accompanying housing trajectory provides further detail. The trajectory includes a contribution of 300 homes per annum, from 2030, to the end of the plan period, from the “Meecebrook” allocation.
- 3.16 In summary, Meecebrook is a new settlement which is likely to continue to deliver new homes and other development well beyond the end of the plan period. The settlement contemplates the delivery of about 10,000 dwellings, a secondary school, primary schools, employment land, land for recreation, a local centre and numerous other amenities. A rail connection, involving the construction of a new station, is also proposed.
- 3.17 The Council has carried out various feasibility studies on highways and transportation and other technical matters in respect of Meecebrook. It has also committed to deliver exemplar design work through the adoption of a Supplementary Planning Document (SPD).
- 3.18 The latest version of the Local Development Scheme (LDS) suggests that the new plan for Stafford will be adopted in late 2024. This leaves only six years between the adoption of the plan and the delivery of the first 300 homes at the settlement. We conclude that this is unrealistic. There are numerous processes to go through before delivery can commence on site. These include:
- preparation and adoption of an SPD to guide development. The SPD cannot be adopted until the Local Plan is;
 - carrying out extensive, additional, technical work on the prevailing site conditions;
 - high level, strategic, planning of the phasing of the development and the infrastructure requirements for each phase;
 - detailed design work on the infrastructure required to service the first phases of settlement;
 - preparation of hybrid / outline planning applications for the delivery of the infrastructure
 - procurement of specialist advisers and letting of contracts for the installation of infrastructure;
 - completion of contracts for the delivery of infrastructure;
 - preparation of hybrid / outline applications for development on the first residential phases of the scheme
 - tendering for the construction of new dwellings; and
 - construction of new dwellings.
- 3.19 The Meecebrook scheme is also dependant on securing very significant sums of money to fund the delivery of new infrastructure, including a railway station.
- 3.20 The Council appears to acknowledge that Meecebrook may not deliver homes in accordance with the proposed trajectory. However, the Council maintains that if this were to happen the Borough would simply make a reduced contribution towards cross boundary needs. This suggests that the Council views the cross boundary element of its overall housing land supply as a buffer to its own housing needs. In reality, it is an important element of supply in the wider housing market area. This

approach to under delivery at Meecebrook is unacceptable and a more robust strategy must be put in place.

- 3.21 In summary, Taylor Wimpey maintain that Policy 1 would not deliver the growth needed for the Borough and that more deliverable sites should be identified in the earlier years of the plan period.

Policy 2 – Settlement Hierarchy

- 3.22 Taylor Wimpey broadly supports the proposed settlement hierarchy established in Policy 2, including Eccleshall’s designation as a Tier 4 – Larger Settlement. This confirms that the village is a sustainable location for new housing development. However, Taylor Wimpey is concerned that no new housing is proposed in Eccleshall, despite its suitability.

4. Compliance With Deliverability, Suitability and Achievability Tests

- 4.1 In previous paragraphs we have identified that the emerging Local Plan should be amended to, amongst other objectives

- Increase the overall and annual housing target for the Borough; and
- Identify additional sites to deliver homes in the first ten years of the plan period.

- 4.2 It is therefore necessary to assess the site against the tests for deliverability set out in Government guidance.

- 4.3 Paragraph 74 of the National Planning Policy Framework (NPPF) requires Local Planning Authorities (LPAs) to identify and update annually a supply of deliverable sites sufficient to provide a minimum of five years’ worth of housing. Paragraph 68 also requires LPAs to identify a supply of deliverable sites for the first five years of the plan and specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the Plan.

- 4.4 Annex 2 of the NPPF outlines that for a site to be considered deliverable, it must be available now, a suitable location for development and be achievable within five years. As mentioned previously, the purpose of these representations is to maintain Taylor Wimpey’s commitment to delivering residential development across the site and to demonstrate the tests set out in Annex 2 are complied with.

Availability

- 4.5 Taylor Wimpey has full control over the land and is committed to working in consultation and partnership with local communities and stakeholders to deliver a high-quality residential scheme on the urban edge of Eccleshall which reflects local values and circumstances.

- 4.6 Taylor Wimpey is currently building out its scheme at Burleyfields in Stafford for 1,400 units, therefore demonstrating a solid track record of housing delivery within the Borough. The modest scale of the development at Eccleshall will result in a rapid delivery of housing without the need for major enabling works or provision of onsite infrastructure. It also envisaged that the site could be delivered as a single phase.

- 4.7 The site is therefore available now.

Suitability

- 4.8 The emerging Local Plan proposes a strategy for delivery of new housing and other development. This includes a “Settlement Hierarchy”, under which most development is focussed towards the top of the hierarchy. The settlement hierarchy is reproduced below.
- Tier 1 – Stafford
 - Tier 2 – Stone
 - Tier 3 – Meecebrook Garden Community
 - Tier 4 – Larger settlements, including Eccleshall
 - Tier 5 – Smaller settlements
- 4.9 There are a total of fourteen “larger settlements”, including Eccleshall. Numerous sites are proposed for allocation in the other larger settlements. However, no development is proposed in Eccleshall.
- 4.10 We conclude that in this case it is necessary to assess suitability in two stages; firstly the suitability of Eccleshall as a settlement and, secondly, the suitability of the site itself.

Eccleshall

- 4.11 The reason why no development is proposed in Eccleshall is revealed in the “*Site Assessment Profiles*” Topic Paper published in October 2022 and the “*Stafford Borough Education Site Assessment Report*” also published in October 2022. The Site Assessment Profiles document confirms that a total of ten sites were put forward for residential development in Eccleshall. However, all were rejected, and no sites are proposed for allocation in the settlement.
- 4.12 A common reason for the rejection of the majority of the sites relates to the limited capacity of schools in the area, in particular at the Bishop Lonsdale Church of England Primary Academy and at the Sir Graham Balfour High School. The report suggests that both of these schools are at capacity and that “*education capacity restraints are unlikely to be able to be resolved*”.
- 4.13 Turning firstly to the Bishop Lonsdale Church of England Primary Academy, the school accepts children between the ages of 3 and 11. The provision of a pre-school / early years setting is optional and a decision that the school has made positively, rather than been obliged to deliver as part of its statutory mandate. Not all primary schools choose to provide pre-school provision and the decision to do so means accommodation / teaching space is occupied that might otherwise be occupied to deliver statutory provision for four / five to eleven year olds.
- 4.14 The school can admit a maximum of 45 pupils into its Reception class each year, which suggests it is a one and a half form entry school with a total capacity of 315 pupil places. Classes are comprised of children from two different year groups.
- 4.15 The merits of combined classes with mixed year groups are disputed. Some experts believe it allows children to progress at a more natural rate and helps to soften the potential impacts of differences in age / development, especially in the younger year groups. Others believe it has a detrimental impact on the education and well being of children who are “held back” in classes with children a school year younger than them.
- 4.16 The roll data for the school indicates that it accepted 32 pupils into its Reception class in 2021 / 22. Other classes were also under capacity, Only years 2 and 4 came close to their capacity. The school

has 239 pupils on its roll and spare capacity of 76 places. This spare capacity of 76 spaces equates to 362 new dwellings, based on Staffordshire County Council’s multipliers.

- 4.17 It is acknowledged that some of the above surplus places may be taken up by children moving into new homes that are under construction in the settlement. However, there is no evidence for this.
- 4.18 If it is assumed that all of the surplus places will be taken up and the school will genuinely be at capacity in, say, the next five years, the most logical step would be to expand it into a two form entry school. This would not be unusual for a settlement the size of Eccleshall, which serves a rural catchment area as well as the village.
- 4.19 The school has a site area of approximately 2.4 hectares. Two form entry primary schools can be accommodated on sites of 2 hectares. The school site comprises the following:
- a range of school buildings including classrooms, assembly space, staff rooms, kitchens, gym/hall etc;
 - car parking for vehicles used by staff and / or visitors;
 - hardstanding around the range of buildings including a marked out court;
 - a secure play area adjacent to the main range of buildings;
 - a multi-use, artificially surfaced, court;
 - amenity / outdoor classroom areas for use when weather permits.
- 4.20 The school was remodelled recently and its capacity increased as a result. We conclude that there is adequate space to increase the footprint of the school buildings to accommodate another half form of entry. This could be achieved through re-arranging the site and re-providing the secure outdoor play area.
- 4.21 Alternatively, the school may decide to deliver parts of its curriculum in “outdoor classrooms” or “Forest School” settings. This option could remove the need for an extension to the main range of buildings.
- 4.22 There would be a cost associated with the above, but the Council has mechanisms in place to secure funding, both from development schemes and from other sources.
- 4.23 Finally, it is appropriate to consider the school in the wider context of primary education in the area. Information published by Staffordshire County Council confirms that the Bishop Lonsdale C of E Primary School is grouped with five additional schools which collectively form the “*Stafford Rural 1 Primary Planning Area*”. The schools have a combined capacity of 910 pupil places. In the 2020/21 academic year, the schools had a combined roll of 835, which equates to 75 spare places. The roll is expected to grow by 61 pupils by the 2025/26 academic year based on known pupils within the system. On that basis, expansion of Bishop Lonsdale C of E Primary Academy could assist if additional provision was required within the wider primary school network.
- 4.24 Turning to secondary school provision, there are no state funded, non - selective schools with a three mile radius of Eccleshall. Children from the settlement attend the “Sir Graham Balfour School”, which is on the north west side of Stafford. A bus service is provided for use by pupils.
- 4.25 The Sir Graham Balfour School is grouped with five additional schools to form the “*Stafford Secondary Planning Area*”. The schools have a combined capacity of 5,931 pupil places. In the 2020/21 academic

year, the combined roll of the schools was 5,211 pupils, which demonstrates a surplus of 720 places. Nevertheless, Staffordshire County Council’s analysis forecasts growth in secondary school pupils of 714, in Stafford, by 2027/28. This means that all of the schools in the planning area will be full. These figures are based on known pupil numbers (i.e. children already in the education system) and does not include new pupils from housing developments in Stafford and other settlements.

4.26 Staffordshire County Council is aware of this issue and its website states the following

“A new secondary school is currently proposed to open beyond the next five years. It will be necessary to provide additional capacity in existing secondary schools across the planning area until the new school is built.”

4.27 Based on the above. It is appropriate to consider whether the Sir Graham Balfour school could be expanded to accommodate more pupils. The site has extensive outdoor areas which could be used to accommodate extensions to the existing range of buildings in order to increase the capacity of the school.

4.28 In summary, there are no education related reasons why land should not be allocated for housing in Eccleshall.

4.29 In all other respects, Eccleshall is a sustainable location for housing and is capable of accommodating development in the early stages of the plan. It has a range of facilities including;

- convenience retail (supermarket) selling fresh food;
- post office / news agent;
- a doctors surgery;
- a dental clinic;
- church;
- sports club;
- fire station;
- vets;
- public houses;
- cafés; and
- hot food takeaways.

4.30 There is a regular bus service to Stone and Stafford.

4.31 We conclude that discounting the settlement from making a contribution towards the supply of new housing in the Borough is inappropriate and ignores its status as a larger settlement in the Borough.

Land North of Shaws’ Lane

4.32 In the following paragraphs we consider the suitability of the site by reference to the site selection form and other evidence base documents that accompany the emerging Local Plan.

Transport

- 4.33 When considering transport, the assessment form states that a single access point is required and that a new bus service should be considered. The overall accessibility score is 3 out of 6.
- 4.34 We maintain that the site is at least as accessible as the land next door, for which planning permission was granted recently. The site is within easy walking distance of most of the facilities in the settlement identified in previous paragraphs. In particular, it is very close to the primary school. The illustrative masterplan proposes a foot path through the site which would link Church Street to the site and the school and community centre.
- 4.35 Accordingly, we query the accuracy of the 3 out of 6 score for transportation and maintain that the site is a suitable, sustainable, location for development.

Ecology

- 4.36 The site assessment form suggests the land has high / medium overall ecological sensitivity and the potential to impact on great crested newts. Further detail on this is included in the "*Stafford Borough Ecological Assessment Report*" which has been carried out by the Staffordshire Wildlife Trust and which includes a proforma for each of the SHELAA sites, including the land at Shaws' Lane.
- 4.37 The proforma confirms that most of the site is in arable use and that its ecological interest is found primarily in its limited number of trees, hedgerows, small pond, a small area of mixed deciduous woodland and a parcel of improved grass land. The proforma confirms that no part of the site is within a designated nature conservation area.
- 4.38 The proforma includes a list of ways in which any ecological harm that might otherwise arise from the development of the site could be avoided or mitigated. The measures proposed are, in effect, "standard practice" for housing development on green field sites. They include; retention of hedges, trees, woodland and ponds; introduction of suitable buffers between ecological assets and built development and appropriate survey work at the planning application stage and when development is carried out.
- 4.39 Ecological work carried out in respect of the site does not identify the presence of great crested newts on it. The illustrative layout (attached as Appendix 1) indicates that half of the site would be used to create a park, with enhanced ecological value. Furthermore, badger setts and TPO trees would be protected and enhanced.
- 4.40 We conclude that the illustrative layout for the site would deliver all of the mitigation measures contemplated by the Wildlife Trust and would also deliver biodiversity net gain through the enhancement of existing parts of the site to create a new park. The site is a suitable location for development from an ecological perspective

Landscape

- 4.41 The site profile form suggest that the site has "high" overall landscape sensitivity. This is the conclusion of the "*Stafford Borough Landscape Sensitivity Assessment*" prepared in support of the emerging Local Plan.
- 4.42 The proforma for the site confirms that the northern half of the site is within the conservation area. The southern part is not subject to any designations.
- 4.43 Most of the landscape assessment criteria, including; land form, land cover; biodiversity, manmade influences; movement and key views / vistas all have medium, or average, sensitivity.

- 4.44 The only criteria that a scored as “high” are “skyline and setting” and “views to and from landscape and cultural heritage features”. In summary, the above identifies that central part of the site is higher than the north and south, which could lead to an impact on the skyline, and the northern half of the site is within the conservation area.
- 4.45 By way of mitigation, the assessment confirms that there is potential for some development in the south of the site, away from the conservation area. This is as proposed by the illustrative masterplan. Skyline effects can be mitigated by planting and maintaining the openness of higher, central, part of the site. This is also proposed by the illustrative masterplan.
- 4.46 We conclude that if the site is developed, as proposed, it would not have any significant landscape impacts and is suitable as a result.

Heritage

- 4.47 The site profile form suggests that the redevelopment of the site would have low direct impacts on heritage but high impacts on the setting of heritage assets. It concludes that the potential for substantial harm arises.
- 4.48 These conclusions are derived from the “*Local Plan Review Historic Site Assessment*” report prepared in support of the plan. The document confirms that the southern part of the site has; “fewer heritage constraints” than the northern half. No development is proposed on the half of the site that falls within the conservation area. This would be retained as a park.
- 4.49 Accordingly, any impacts on heritage assets could only be “*less than substantial*” as the redevelopment of the site would not directly affect a designated heritage asset.
- 4.50 Development on the site, as proposed by the illustrative masterplan, would have very limited heritage impacts.
- 4.51 In summary, we conclude that the site profile form did not take the indicative masterplan for the site into consideration when reaching its conclusions. The site is suitable from a heritage perspective.

Education

- 4.52 When considering the site’s merits, the form refers to the lack of capacity at the two schools. This issue is considered in the previous paragraphs. We maintain that it should not be a barrier to development, because new accommodation could be provided on site.
- 4.53 In any event, a development of about 200 homes at Shaw’s Lane would generate about 42 additional primary school pupils, or six new pupils per year group. One of Staffordshire County Council’s key criteria when allocating school places to primary school children is the distance between the home address of the child and the school applied for. The school would be within easy walking distance of the site, so new pupils would be very likely to secure places. This may lead to fewer children from outside the catchment attending the school. However, directing pupils to schools within their catchment is an objective of the County’s admissions policy.

Achievability

- 4.54 As set out above, there are no significant constraints across the site that prevent residential development from being delivered.

- 4.55 Should the site receive an allocation in the Local Plan, Taylor Wimpey would be able to start to deliver housing on site shortly after the grant of planning permission and immediately following site preparation works and the discharge of any relevant planning conditions.
- 4.56 Therefore, there is a realistic prospect of housing being delivered on the site within five years.

5. Summary and Conclusion

- 5.1 In response to the Preferred Options consultation document published by Stafford Borough Council, Avison Young is instructed by Taylor Wimpey to provide written representations in relation to its land at Shaws’ Lane, Eccleshall.
- 5.2 We have assessed the soundness of the emerging Local Plan, in particular by reference to the identification and maintenance of a five year supply of housing land throughout the plan period.
- 5.3 We maintain that the overall housing target for the Borough is too low. It does not reflect growth fuelled by the creation of significant new economic drivers and ignores the current situation in the housing market areas that adjoin Stafford.
- 5.4 It appears likely that the breakdown in the joint planning exercise previously ongoing in the Black Country will have a “ripple effect” on neighbouring authorities. Walsall and Wolverhampton Councils (the closest to Stafford) now have to carry out their own plan making exercises, which includes the requirement to satisfy the “duty to cooperate” on an individual, rather than Black Country wide, basis. This will result in increased pressure on South Staffs and Stafford Borough Councils to increase their contribution to unmet need elsewhere.
- 5.5 The “unmet need” element of Stafford’s supply appears to have been selected arbitrarily, without a robust calculation or agreement with neighbours on what the unmet needs might be. Stafford is a relatively unconstrained Borough. Large parts of it are; outside the West Midlands Green Belt; do not suffer from flooding or other technical constraints and are well connected by existing transport corridors. The SHELAA demonstrates that the Borough could accommodate significantly more unmet need without detriment to the social, economic or environmental quality of the area.
- 5.6 Furthermore, the Borough’s contribution towards unmet need would be reduced if, as anticipated, the new community at Meecebrook fails to deliver housing in accordance with the proposed trajectory.
- 5.7 We conclude that the housing target contained in **Policy P1** should be revisited and increased to at least 800 dwellings per annum.
- 5.8 Turning next to delivery, the Council’s housing trajectory relies heavily on new homes coming forward at the Meecebrook community. Whilst delivering sustainable patterns of development in new settlements is laudable in many respects, it introduces significant vulnerability and risk to housing land supply. We conclude that Meecebrook is unlikely to be delivering 300 homes per year within six years of the adoption of the Local Plan.
- 5.9 We maintain that Meecebrook’s contribution should kick in later in the trajectory than currently proposed. Furthermore, it should ramp up from a relatively low starting number per year, say 50 dwellings, to a maximum of 300 dwellings per annum at its peak. A contribution of 300 units per annum from a standing start does not reflect the realities of how homes are planned, built and sold in

the UK. Completions are typically low in the early years of a development and increase steadily as the scheme gains mass and a community develops.

- 5.10 We request that the housing trajectory associated with **Policy P1** be amended to reflect a realistic assessment of delivery from Meecebrook.
- 5.11 The anticipated failure of Meecebrook to deliver homes as currently suggested will leave a shortfall in supply in the first 10 years of the plan period. This shortfall could be as many 1,000 homes and we anticipate that each of the responders to the Preferred Options plan will have their own view on this and associated reasoning.
- 5.12 The shortfall from Meecebrook, combined with an increased contribution to unmet needs, will result in a significant shortfall in housing supply in the plan period as a whole and in the first ten years in particular. The SHELAA demonstrates that at least an additional 2000 homes could be delivered without harm to acknowledged interests. On the basis that additional sites must be identified for the first 10 years of the plan, it is appropriate to consider where these should be.
- 5.13 Eccleshall is a large settlement with a comprehensive range of existing facilities. It is a sustainable location for growth and achieved the joint highest score of the “larger” settlements in the Council’s *“Revised Settlement Assessment and Profiles Topic Paper”* prepared in support of the emerging Local Plan. However, no new housing is proposed. The sole barrier to development appears to be the capacity of two schools.
- 5.14 We have examined the two school sites and cannot find any credible reasons why additional pupils could not be accommodated. The primary school was successfully extended recently, following the sale of land adjacent to the Shaws’ Lane site for housing. This created a significant increase in capacity.
- 5.15 Finally, the site offers a significant range of benefits to the community which confirm its status as the preferred site in the village, as set out in our opening paragraphs.
- 5.16 We request that **Policy 12** be amended to include a proposed allocation of 206 homes on land to the north of Shaws’ Lane, Eccleshall.

Avison Young
December 2022



TECHNICAL NOTE

To: [REDACTED] Avison Young
 From: [REDACTED] Director, Icen
 Date: 23.03.20
 Title: **Stafford Economic & Housing Development Needs Assessment**

1. Icen has been commissioned by Taylor Wimpey Strategic Land to undertake a technical review of the *Economic & Housing Needs Assessment* prepared for Stafford Borough Council by Lichfields, to inform the initial consultation which the Council is undertaking on Issues and Options as part of the preparation of a new Borough Local Plan 2020-40. This note considers issues related to:

- Economic and demographic-led needs;
- Affordable housing needs;
- Housing mix; and
- Local housing dynamics and the distribution of development.

a. Initial Consideration of Overall Housing Needs

1. The I&O Consultation Document sets out 7 scenarios for housing provision ranging from 349 – 746 dwellings per annum (dpa). Scenario A is the standard method based on current data (408 dpa). Scenarios B and C represent essentially sensitivity testing based on alternative demographic assumptions. Scenarios D-G then represent scenarios based on alternative assumptions on future employment growth.
2. Icen has sought to review the basis of the scenarios, and their appropriateness for strategic planning purposes.

Standard Method and Alternative Demographic Scenarios

3. The current national policy framework is that the minimum local housing need generated by the standard method of 408 dpa is a minimum starting point. 408 dpa was the correct figure at the time of publication of the Consultation Document. Updating this to take account of the latest data shows a minimum local housing need for 400 dpa.

Updated Stafford LHN Calculation

	Stafford
Household Growth pa over next 10 years, 2020-30 (2014-based)	331
Median workplace-based affordability ratio, 2019	7.35
Adjustment Factor	21%
Local Housing Need	400

4. As set out by Lichfields [Paras 10.9 – 10.13] this is intended to be a ‘minimum starting point’ and as we consider later, there may well be circumstances and sound reasons for planning for higher levels of housing provision.
5. Lichfields developed two alternative demographic scenarios. Scenario B inputs data from the 2014-based Household Projections for projected household growth over the plan period rather than over a 10 year period (2019-29) into the standard method, resulting in a lower need for 349-404 dpa. Scenario C inputs takes account of a larger population base in 2019, but otherwise uses consistent assumptions to Scenario B. These scenarios show a need for between 329 – 404 dpa, which is below the minimum local housing need set by the standard method. No clear evidence is shown that there are underlying issues with the data which fed into the standard method figure. These scenarios are simply based on testing alternative demographic assumptions. However the intention in introducing the standard method was to make the approach of calculating a minimum figure ‘simpler, quicker and more transparent’, and to ensure a consistent starting point in calculating housing need in local authorities across the country.
6. Lichfields analysis provides no evidence that there are underlying issues with the 2014-based Household Projections; indeed both Scenarios B and C draw core assumptions from these projections. They simply adopt alternative timeframes and base assumptions, using an approach which is inconsistent with the PPG. IcenI therefore considers there is no justification for a figure below the standard method.
7. IcenI notes that ONS has since published new 2018-based Sub-National Population Projections in March 2020. These show much stronger population growth, of 17,057 persons over the 2020-40 plan period, compared to population growth of 8,243 in the 2014-based SNPP (EDHNA Scenario B) and 8,508 persons in the rebased population scenario (Scenario C). More recent data thus points to significant stronger population growth, and thus housing need.

Scenarios for Employment Growth

8. Scenarios D, E, F and G consider alternative scenarios for economic growth and housing need. To analyse these, IcenI has sought to consider first the scenarios for future economic performance; before moving on to appraise the assumptions used in linking homes and jobs.
9. Lichfields EHDNA Report puts forward four economic-driven scenarios. We have summarised these in the table below:

Lichfields’ Economic Driven Scenarios

	D. CE Baseline	E. Regeneration	F. Past Trends	G. CE + 50%
Jobs Growth, 2020-40	5,929	12,478	13126	8900
Base Dwellings pa	435	647	683	540
PCU Dwellings pa	489	711	746	597

10. Scenario D (CE Baseline) is derived from an off-the-shelf econometric forecast from Cambridge Econometrics November 2018 release. This is based essentially on historic performance of different sectors in the borough relative to regional/national trends triangulated against CE’s expectations on future sectoral performance. Such forecasts are a) relatively volatile; and b) take no account of circumstances which may mean that the future is different from the past such as through enhanced connectivity. CE themselves would describe the forecasts as a tool to understand how the economy might perform, to be brought together with local understanding and intelligence, rather than an ‘answer’ in themselves.

11. Lichfields' analysis shows that employment in the Borough increased by on average 0.83% pa over the 2000-18 period, this being a period in which there was a very strong decline in manufacturing jobs (-5,100) but growth in a range of other sectors. CE's forecast looking forwards is however of a rate of growth of less than half of this, at 0.39% pa. The EHDNA provides only a very brief commentary on the CE baseline forecast (Scenario D). No coherent explanation is provided by Lichfields as to why economic fundamentals in the area are now significantly poorer such that future growth rate in employment would be so substantially less. Icen consider that a detailed critical analysis of the baseline forecast and why this differs so substantially from past trends is lacking. The jobs growth in B-class sectors in the CE baseline forecast is very modest.
12. Considering the expected performance of different sectors as shown in Table 7.2 in the EHDNA and bringing this together with the wider analysis and stakeholder engagement undertaken, Icen would suggest that:
- The CE forecasts significantly underplay the future growth potential in distribution/logistics activities which derive from the shift in the retail sector from stores to online and growth in advanced manufacturing, together with Stafford's location relatively centrally within the UK (with major population centres within a 4.5 hr drivetime) and on the M6. This influences transport, warehousing and postal, wholesale and retail trade.
 - The CE forecasts for office-based professional services are also significantly below historical growth rates when in reality with HS2 making Stafford one of the best connected places in the region, the reality is that stronger growth than has been seen historically seems more likely. Furthermore with growth in telecommunications, the characteristics of the rural parts of the Borough can be expected to support professional services growth in small and home-based businesses.
 - Growth in some other sectors in the forecast, including construction and consumer-related services such as retail, food and beverage and recreational services, are influenced by population and housing growth. Planning for higher growth will support higher jobs growth in these areas.
13. In addition, we would agree with the Lichfields' comment that the forecast of a reduction in manufacturing jobs seems unrealistic; and note local stakeholders consider advanced manufacturing will grow. Whilst this may not represent significant additional numbers of jobs, it will contribute to growth in the wealth of the local economy feeding through into spending and performance of other sectors.
14. The evidence thus suggests to us that it is likely that employment growth will be stronger than in the CE baseline forecasts.
15. Scenarios E, F and G make adjustments to the baseline CE forecasts to derive a series of alternative scenarios for economic performance. These are as follows:
- Scenario E (Regeneration Scenario) – this scenario assumes that in addition to the CE forecast of 5,929 jobs to 2040 there will be an additional 2,913 jobs generated through delivery of a new garden community and 2,723 jobs generated through delivery of Stafford Station Gateway. Total employment is thus expected to grow by 12,478 (2020-40).
 - Scenario F (Past Trends) – this scenario projects forward the 0.83% pa growth rate achieved historically; resulting in net jobs growth of 13,128 (2020-40).
 - Scenario G (CE + 50%) – this scenario simply uplifts the CE baseline figure for total jobs of 5,929 by 50% resulting in net jobs growth of 8,894 (2020-40).
16. Ultimately the question which needs to be asked is: what is a realistic assessment of how the Borough's economy will perform?

17. An analysis of recent trends between 2015-18 shows substantial growth in wholesale/retail, in ICT and professional services and construction; set against a decline in particular in public administration. Whilst manufacturing employment overall remained static, there was growth in employment across a number of manufacturing sub-sectors including chemicals, food products and textiles.

Change in Employment, Stafford Borough 2015-18

	2015-18
G : Wholesale and retail trade; repair of motor vehicles and motorcycles	1000
M : Professional, scientific and technical activities	1000
F : Construction	500
J : Information and communication	250
L : Real estate activities	100
E : Water supply; sewerage, waste management and remediation activities	-50
R : Arts, entertainment and recreation	-250
N : Administrative and support service activities	-500
O : Public administration and defence; compulsory social security	-1000

Source: IcenI analysis of BRES data

18. The recent performance points to an outlook across key growth sectors which is significantly more positive than the CE baseline forecasts.
19. Applying a 50% uplift to the baseline forecasts as per Scenario G is a relatively crude approach; and a more detailed assessment of sectoral performance and growth potential would be required.
20. IcenI consider that the Past Trends Job Growth is - as a matter of principle - a credible scenario, not least as it is based on the average growth rate over a sustained period which covers a full economic cycle. However, the particular factors underpinning very recent growth warrant further consideration.
21. Turning to the Regeneration Scenario, this assumes that delivery of a new garden community of 10,000 homes will deliver gross jobs of 12,337 (EHDNA Table 4.7). It assumes that all of these new jobs will be net additional to the baseline forecasts; and that 3,713 of them will be delivered over the plan period to 2040 on the basis that the commercial elements are delivered alongside residential. In addition it assumes that provision of c. 70,000 sq.m of office space, together with leisure, retail and hotel and some industrial space at the Station Gateway will deliver 5,672 jobs in gross terms. It then assumes that 50% of these will already be factored into the CE baseline.
22. There are a number of relatively high level assumptions which IcenI would recommend are tested further. Firstly whilst it might be reasonable to treat a new Garden Community as additional to the District's underlying development/ economic needs, there will be jobs created beyond the B-class and retail sectors from a community of this scale; including in healthcare, education, construction, recreation and other service activities. None of these are captured within the Lichfields' analysis.
23. Secondly, in respect of the Station Gateway, the working assumption that 50% of the jobs will already be factored into the CE baseline [Para 7.41] is not supported by the evidence. Table 7.2 shows that the CE baseline forecast supports growth of 437 jobs in office-based activities (B1a/b Use Classes) over the plan period. Yet Figure 7.5 shows workforce jobs growth of 5,381 in B1a office activities at the Station Gateway (out of a total of 5,672 jobs). Even if all of the non-office jobs at the Station Gateway are assumed to be 'factored in' to the CE baseline (i.e. 291 jobs),

the office component generates 4,944 additional jobs over and above the baseline projections. This level of growth over the baseline forecasts is significantly greater than the 2,723 jobs figure assumed by the Council.

24. The evidence thus indicates that the detailed modelling in the Regeneration Scenario may significantly underplay the scale of jobs growth which could arise from the delivery of a new garden community and Station Gateway.
25. Standing back from the detail of the scenarios themselves, IcenI would consider that:
- The borough has a strong manufacturing sector which the evidence and stakeholder engagement undertaken indicates is expected to see employment grow;
 - The borough is well placed to see growth in logistics/distribution as a function of its location and main road/rail connectivity. Growth in this sector is likely given the shift in retail spending towards online;
 - The delivery of HS2 will cut journey times to London from 75 to 53 minutes and make Stafford one of the best connected places in the region. It is reasonable to expect this to support the Borough's economy and act as a catalyst for an office scheme around the Station. But housing growth will be important in delivering this by providing an available workforce as well;
 - These core growth drivers will support additional spending in the local economy including on retailing and local services; and demand for additional public services such as health and education which in turn will require higher employment.
26. Total employment in Stafford in 2020 is estimated at 73,300 of which 37.5% is estimated to be in B-class sectors. On the basis of the above analysis, IcenI consider that taking account of the level of office floorspace proposed at the Station Gateway, office-based employment can be expected to grow by c. 5,400. No additional allowance has been made for office floorspace growth within a Garden Community. For industrial sectors (industrial and logistics/distribution), we assess that employment growth of 2,300 could be expected over the plan period in line with the EHDNA Regeneration Scenario. We consider that given these particular drivers, a higher proportion of employment growth will be in B-class uses at 45% of the total; but that there will be c. 9,500 additional jobs created in other non-B sectors. This looks reasonable against the past trend forecast.
27. In total, we consider that this scenario could therefore support employment growth (net) of 17,300 over the plan period. This would represent a growth rate of 1.1% pa in employment over the plan period. Whilst this is above past trends, this rate of growth would seem reasonable given that the manufacturing sector is no longer expected to see significant job losses, the significant accessibility improvements envisaged, the strength of the area for logistics/distribution, and jobs in service sectors expected to be supported.
28. The delivery of HS2, a new garden community and a western access route to Stafford clearly represent circumstances in the terms set out in Para 2a-010 in the PPG where it would be appropriate to plan for higher housing provision than the standard method suggests.

Assumptions Used in Linking Homes and Jobs

29. The assumptions which Lichfields' use to link homes and jobs are set out in the EHDNA in Para 10.55 and Appendix 4. The use of 2014 population and household projections for base assumptions is reasonable, albeit that more recent ONS projections show more modest growth in life expectancy.

30. Office for Budget Responsibility (OBR) labour market participation rates are also reasonable, however again the latest data is now derived from the July 2018 Fiscal Sustainability Report. This taking account of more recent data shows more positive assumptions on improvements in economic participation amongst some older age groups. It would be reasonable to use the more recent data.
31. The Lichfields' modelling assumes a labour force ratio of 0.93 implying net in-commuting. This appears to be based on Annual Population Survey data over the last five years. The appropriateness of this assumption needs to be tested. Figure 7.1 in the Lichfields report shows relatively rapid jobs growth over the period between 2011-18 with employment rising in the order of 8,000 jobs; but the Annual Population Survey shows the number of residents in employment having grown by around 1,300 persons over this period. What appears therefore to have happened is that employment growth has run ahead of growth in the workforce (which is linked to housing delivery) resulting in growth in net in-commuting. Iceni does not consider that it is reasonable to perpetuate this moving forwards.
32. Iceni consider that the evidence clearly points to demand outstripping housing supply in Stafford in recent years. Housing delivery performance has exceeded housing targets; but the above evidence suggests that housing need has been stronger still.
33. The final core assumption is related to headship rates. Lichfields have modelled two scenarios: using assumptions in the 2014-based household projections; and a 'partial catch-up scenario' in which the headship rates of those aged 15-34 are adjusted to make up half of the difference between the 2008-based household projections and 2014-based household projections, presumably over the plan period.
34. Government's objectives for housing are to improve affordability, and this is why there is an affordability adjustment build into the standard method. The Partial Catch-Up Scenario essentially models the demographic effects of this on improving the ability of younger households to form (rather than seeing them further deteriorate). This is therefore an appropriate planning assumption to use when modelling the economic-led scenarios, as without this the assumption is that the ability of younger households to form will fall over time, as Figure 10.5 in the EHDNA shows, which would not be consistent with Government guidance or aspirations. The PPG sets out that where an alternative approach is used to calculate housing needs, it must take into account market signals; and only the PCU scenario does this.
35. However Iceni would question whether it is appropriate to assume a recovery in household formation is phased over 20 years. It is arguably more in line with Government aspirations to increase housing supply and improve affordability to model this recovery over a 10 year period to 2030.
36. On the basis of the above, Iceni has modelled the level of housing need required to support the delivery of 17,000 jobs over the plan period using the following assumptions:
- Taking the base population from ONS 2018 Mid Year Population Estimates, which is then rolled forward to 2020 using data on fertility, mortality and migration from the ONS 2016-based SNPP;
 - Assumptions on fertility and mortality and migration profile derived from ONS 2016-based SNPP;
 - Adopting economic participation rates from OBR 2018 Fiscal Sustainability Report and applying these to a local baseline position (from 2011 Census) for Stafford;
 - An assumption that 4% of people have more than one job (double jobbing);

- Modelling two scenarios for commuting; one which takes the 2011 Census commuting ratio of 0.96 and holds this constant; and another which simply takes a 1:1 ratio between expected growth in residence- and workplace-based employment in the Borough;
- Modelling a Partial Catch-Up in headship rates for younger households aged 25-34 and 35-44 over the course of the plan period;
- A vacancy rate of 3.2% taken from para 9.60 of the Stafford EHDNA.

37. The results of these scenarios are shown in the table below. Icení's analysis indicates that to support 17,000 jobs over the plan period would require between 750-870 dpa depending on the assumptions made on commuting.

Icení Scenarios for Housing Need to support 17,000 jobs (2020-40)

	Households 2020	Households 2040	Change	Per annum	Dwellings per annum
0.96 Commuting Ratio	59,689	74,208	14,520	726	749
1:1 Commuting Ratio	59,689	76,545	16,857	843	870

Source: Icení Demographic Modelling

38. A further consideration in respect of the commuting dynamic is the proposals for a Strategic Rail Freight Interchange (SFRI) at Four Ashes. Whilst this is in South Staffordshire, Stafford would be one of the nearest urban areas. Chapter 14 of the Environmental Statement submitted alongside the DCO indicates that this scheme would support 8,550 additional jobs on site. The Transport Assessment included a Gravity Model indicating that 5.13% of the workforce was expected to be drawn from Stafford. If these are multiplied together, the indication is that c. 440 additional workers employed at the SFRI at Four Ashes could be expected to live within the Borough. There is the potential that this will influence housing need within the Borough.

b. Affordable Housing Needs

39. The EHDNA provides an assessment of affordable housing needs in Section 11. This follows the Basic Needs Assessment Model set out in the PPG in broad terms, concluding in identifying a need for between 252 – 389 affordable homes per annum.

40. As the EHDNA sets out at Para 11.3, affordable housing is defined in the NPPF as including housing that provides a subsidised route into home ownership for those that could not achieve home ownership through the market. Put simply, the Lichfields' assessment does not deal substantively with this group.

41. The EDNA establishes that at a Borough level, a household would require an income of between £18,545 - £24,480 to afford to rent privately (without support), but would require a significantly higher income of £34,903 - £42,857 to be able to afford to buy a home (Table 11.1). There is thus a substantial proportion of people who have an income which means they could afford private rents, but cannot afford to buy a home. Using the analysis in Table 11.2, around a third (33%) of newly-forming households fall within this group.¹

42. But the Lichfields' modelling of affordable housing needs assesses the needs only of those unable to rent **or** buy (see Step 2.2 and Paras 11.32 and 11.34). Those that fall within the gap whereby they can afford to rent (but cannot afford to buy) are not assessed in the Lichfields' modelling to have an affordable housing need. This is inconsistent with the NPPF and PPG, and

¹ 32.5% - 33.2% based on the two alternative affordability tests

under-estimates the affordable housing need. Indeed the concept here is illustrated in Figure 13.5 in Lichfields' analysis.

43. We have therefore sought to estimate the numbers of additional households who aspire to home ownership but would need support to do so. Our approach takes account of the following:
- Current need: the 2011 Census showed 7,200 households living in the PRS in 2011 in Stafford. The English Housing Survey estimates the PRS size to have increased by 20% since this point, and therefore it is assumed that it accommodates 8,640 households. If a third fall in the rent-to-buy gap, this would equate to a current need of 2,851 households. This is equivalent to an annualised figure of 143 pa over a 20 year period.
 - Newly-Arising Need: newly-forming households are estimated at 1051 per annum. If a third of these fall within the rent-to-buy gap, the newly-arising need is 347 households pa.
 - Supply: we assume that 50% of lower quartile sales over the last 3 years are available to meet needs of those within this group, reflecting that some properties have issues of quality/condition. This equates to sales of 428 per annum.
 - On this basis we identify an affordable home ownership need for 62 homes pa, in addition to the need for rented affordable housing shown.
44. Icení's analysis thus indicates that the total affordable housing need should thus fall between 314 – 451 affordable homes per annum. The EHDNA indicates that the notional proportion of affordable housing delivered on mixed tenure schemes is 30% [Para 11.69] on which basis 1047 homes overall would be required to deliver the affordable housing need in full.
45. The evidence thus clearly points to the need to consider higher overall housing provision than the standard method. It supports consideration of an economic-led approach to calculating a housing requirement.

c. Housing Mix

46. The EHDNA considers the mix of housing needed in Section 13. In simple terms it considers current occupancy patterns of different household types, and then applies this to the projections of different household types in the 2014-based Household Projections. The projected household growth for different household types is uprated on a pro rata basis to align with the standard method LHN figure of 408 dpa (as described in EHDNA Para 13.11).
47. This modelling approach assumes that the growth in different types of households will be consistent to that in the base projections, where the greatest growth was in singles and couples aged over 65. These assumptions are unrealistic.
48. Scenarios which deliver a higher housing requirement relative to the base projections (288 dpa) are likely to see stronger household formation amongst younger households (as for instance the PCU Scenarios model) and are likely to see increased in-migration. This is what Lichfields show through their own demographic modelling but is not followed through to the analysis of housing mix. The age profile of migration is skewed towards younger age groups and families, and this would substantively affect the mix of properties needed to accommodate growth.
49. The housing mix modelling moving forwards will thus need to be updated to align with the level of housing provision taken forwards through the Local Plan.

d. Distribution Scenarios

50. Icenote note that a range of distribution scenarios have been set out within the Issues and Options document by combining the scenarios for different levels of growth with six different distribution scenarios which we have paraphrased as follows:
- Focus on Stafford and Stone
 - Stafford, Stone and Key Service Villages
 - Dispersed growth across the Settlement Hierarchy
 - Focused growth within Garden Communities
 - Dispersed Growth plus Garden Communities
 - Transport Corridors.
51. The NPPF is focused on supporting sustainable growth at both urban and rural communities; and there are strong reasons why growth will be necessary at a range of tiers within the settlement hierarchy.
52. Eccleshall is identified in EHDNA Table 12.1 as having 2,116 dwellings. The Issues and Options document shows that it has had planning permissions granted for a further 323 dwellings since. It is thus one of the larger rural settlements in the Borough with sufficient critical mass to support a higher level of service provision.
53. Eccleshall's higher service provision is reflected in Table 12.2 in the EHDNA, which shows that it has 2 health facilities a library, hourly bus service, employment provision within relative proximity etc. The EHDNA evidence points to availability of local employment opportunities, both within the settlement and the immediate surrounding area. In addition there is an existing level of educational infrastructure within the local area, including Eccleshall Pre-School, Bishops Lonsdale Primary School and Walton Hall Academy.
54. These attributes support the identification of Eccleshall as a sustainable location for growth. Growth will be necessary to support local service provision including retaining existing local shopping provision, and the population of primary school age (which in trend-based demographic projections in the EHDNA Figure 10.1 are shown to fall). Growth is thus needed to support settlement sustainability.
55. In considering the growth options, it is important that the Council takes into account relevant market signals. The EHDNA shows the Rural West and Rural East of the Borough, in which Eccleshall is located, as having higher average house prices [EHDNA Figure 4.1], and higher rental costs than the urban areas in the Borough [EHDNA Table 9.8]. There are thus market signals pointing to stronger comparative demand. Additional housing provision will be important to addressing affordability in these areas.
56. A further strategic consideration is the timescales over which different sizes of site will contribute to supply, and the need to ensure that there is a five year land supply on adoption of the Plan; and that this is maintained over time. Providing for growth at a number of different locations within the Borough, which draw on different local sub-markets, as well as ensuring that there is not undue reliance on large strategic sites, and sites are allocated which can come forwards quickly will be important to ensuring the overall deliverability of the Plan and its ability to support and maintain a 5 year housing land supply.

e. Issues moving Forwards

57. The preparation of the Borough Local Plan is at a relatively early stage. The Government published a policy paper, *Planning for the Future*, on 12th March announcing its intention to bring forward a Planning White Paper in Spring 2020 and to review the formula for calculating local housing need to ensure that the country is planning for the delivery of 300,000 homes per year. A key implication of this is that undue reliance should not be placed on the current standard method figure of 408 dpa (or the updated figure of 400 dpa). This, and the method from which it was derived, is likely to have changed before the Plan is submitted.

58. An appropriate approach for the Council to take would be to plan on the basis of a higher level of housing provision in order to future proof the strategy against changes in Government policy in this area.

f. Summary of Key Points

59. The key points arising from Icení's analysis are as follows:

- The latest data points to a minimum local housing need for 400 dpa. There are no exceptional circumstances justifying a housing requirement below this; but the delivery of HS2, a new garden community and a western access road to Stafford would clearly represent circumstances in the terms set out in Para 2a-010 in the PPG where it would be appropriate to plan for higher housing provision than the standard method suggests.
- The latest ONS population projections point to much stronger trend-based population growth of more than double that which fed into the standard method calculations;
- An economic-led approach to considering what scale of housing to plan for is reasonable, however Icení's analysis does not find the scenarios set out in the EDHNA that convincing. The EDHNA does not adequately interrogate why there is such a substantial difference between the CE baseline forecast and past growth trends (Scenarios D and F), with generally a lack of critical interrogation of the CE baseline forecast.
- Icení considers that the CE baseline forecast underplays growth potential in distribution/logistics given shift of retailing online and Stafford's locational attributes. Lower growth in office-based professional services given telecoms improvements and HS2 appears unlikely. Lichfields themselves considered the manufacturing forecast as too pessimistic.
- Scenario G which models a 50% uplift on the CE baseline forecast is relatively crude and does not provide any further assistance in understanding how Stafford's economy is expected to perform in the future.
- The Regeneration Scenario (Scenario E) is potentially more useful. However, Lichfields scenario development takes no account of jobs in healthcare, education, construction, recreation which would be associated with delivery of the garden community. It does not properly consider the degree to which jobs at the Station Gateway would be additional to the baseline. It thus potentially significantly under-estimates job growth arising from these identified drivers.
- Our initial analysis shows that to support 17,000 jobs over the plan period would require between 750-870 dpa depending on the assumptions made on commuting.
- We would recommend therefore that further analysis of economic growth potential and associated housing need is undertaken in taking forwards the Plan.
- Icení's analysis also shows that the EHDNA does not take account of the needs of those who can afford to rent privately but who aspire to home ownership but require help to do so. These fall within the definition of households with an affordable housing need in the 2019 NPPF. Addressing this, we estimate that there is a need for 341 – 451 affordable homes per year. The scale of affordable housing need provides a strong basis for considering higher levels of housing provision in the Borough.
- The EHDNA's analysis of the mix of different sizes/types of homes needed will also need to be revisited to take account, in due course, of a preferred scenario for growth.

- Finally, Icení's analysis also addresses questions regarding the distribution of development within the Borough. It points to a need for growth at a range of tiers in the settlement hierarchy in particular in places which provide everyday services; and identifies market signals which promote growth in the Rural East and Rural West of the Borough to address particular affordability pressures.

From: Kharade, James (Avison Young - UK)
Sent: 09 December 2022 18:06
To: Strategic Planning Consultations
Subject: Representations on Behalf of Taylor Wimpey to the Local Plan 2020-2040 Preferred Options Consultation
Attachments: 2022-12-09 - Taylor Wimpey Representaion to Stafford BC Local Plan 2020-2040 Preferred Options Consultation.pdf; MARLBOROUGH_RD_STONE_DS_DEC22_FINAL_EMAIL.pdf

Dear Sir/Madam,

This afternoon, on behalf of Taylor Wimpey, I completed the online consultation form in response to the Local Plan 2020-2040 Preferred Options consultation. As referred to on the form, we wished to submit further information but did not see opportunity to do so. Please therefore find attached the Vision and Delivery Statement, and formal written representations.

Please can this be considered alongside the consultation form, and please can you confirm in writing receipt of this email and that the documents attached will be considered as part of the Council's Local Plan 2020-2040 Preferred Options consultation.

If there are any issues, please can you contact me as soon as possible to ensure that we can address them in sufficient time.

Kind regards,

James Kharade
Graduate Planner

AVISON

From: Preferred Options Consultation [REDACTED]
Sent: 09 December 2022 17:02
To: Strategic Planning Consultations
Subject: Preferred Options Consultation - Submitted Response

Full name: **James Kharade**

Email: [REDACTED]

Agents and Developers

Organisation or Company: **Avison Young**

Age: **No reply**

Added to database: [REDACTED]

Topics (Contents page): **Development Strategy and Climate Change Response**

Vision and Objectives

Q1 - Which 3 are most important to you? **Not asked**

Development Strategy and Climate Change

Q2 - Do you agree with each of the policies in this chapter?

Policy 1 (Development Strategy): **No**

Comments: **Taylor Wimpey welcomes the Council's commitment to the delivery of new homes over the Plan period 2020-2040, and broadly supports the principles outlined within Policy 1. In particular, Taylor Wimpey supports B5 of Policy 1 which establishes that part of the housing requirement for the Borough will be delivered by site allocations defined in Policy 12.**

Policy 2 (Settlement Hierarchy): **Yes**

Comments: **Taylor Wimpey supports the proposed settlement hierarchy established in Policy 2, including Stone's designation as a "Tier 2" settlement. Further, Taylor Wimpey supports the provision, under Part B, that new housing should be directed towards Stone. The continued designation of Stone as a Tier 2 settlement, combined with the site allocation STO07 within Policy 12, will allow development to be delivered in sustainable locations and provide opportunities for Stone to grow and thrive.**

Policy 3 (Development in open countryside): **No reply**

Comments: **No reply**

Policy 4 (Climate change and development requirements): **No reply**

Comments: **No reply**

Policy 5 (Green Belt): **No reply**

Comments: **No reply**

Policy 6 (Neighbourhood plans): **No reply**

Comments: **No reply**

Meecebrook Garden Community

Q3 - Do you agree with proposed new garden community: **No reply**

Comments: **No reply**

Site Allocation Policies

Q4 - Do you agree with the proposed allocations?

Policy 9 (North of Stafford): **No reply**

Comments: **No reply**

Policy 10 (West of Stafford): **No reply**

Comments: **No reply**

Policy 11 (Stafford Station Gateway): **No reply**

Comments: **No reply**

Policy 12 (Other housing and employment land): **No reply**

Comments: **Taylor Wimpey supports the principle of Policy 12 and the land allocation under the reference STO07. At present, the draft policy identifies a site capacity of 101 units. Taylor Wimpey maintains this should be increased to 119. This increase would deliver additional homes without detriment to any acknowledged interests.**

Site Allocation Policies (continued)

Q5 - Do you agree with the proposed allocations?

Policy 13 (Local Green Space): **No reply**

Comments: **No reply**

Policy 14 (Penk and Sow): **No reply**

Comments: **No reply**

Policy 15 (Stone Countryside): **No reply**

Comments: **No reply**

Economy Policies

Q6 - The local plan seeks to protect previously allocated and designated industrial land and support home working and small-scale employment uses. Do you agree? **No reply**

Comments: No reply

Q7 - The Stafford Borough Plan proposes policies around the town centres uses, agriculture and forestry development, tourism development and canals. Do you agree? **No reply**

Comments: **No reply**

Housing Policies

Q8 - The local plan proposed a policy (23) on affordable housing. Do you agree? **No reply**

Comments: **No reply**

Q9 - The local plan proposes a policy (30) to help meet identified local need for pitches for Gypsies and Travellers. Do you agree? **No reply**

Comments: **No reply**

Q10 - The local plan proposes policies around homes for life, rural exception sites, new rural dwellings, replacement dwellings, extension etc. Do you agree? **No reply**

Comments: **No reply**

Design and Infrastructure Policies

Q11 - Do you agree with policies? **No reply**

Comments: **No reply**

Environment Policies

Q12 - Do you agree with policies? **No reply**

Comments: **No reply**

Connections

Q13 - Do you agree with policies? **No reply**

Comments: **No reply**

Evidence Base

Q14 - Have we considered all relevant studies and reports? **No reply**

Comments: **No reply**

Q15 - Do you think there is any further evidence required? **No reply**

Comments: **No reply**

General Comments:

Taylor Wimpey broadly supports the principles outlined in the Local Plan Preferred Options consultation document. Taylor Wimpey supports the retention of Stone as a Tier 2 settlement and a location to which residential development should be directed. Taylor Wimpey also welcomes the proposed allocation of the site under emerging Policy STO07. At present, the draft policy identifies a site capacity of 101 units. Taylor Wimpey maintains this should be increased to 119. This increase would deliver additional homes without detriment to any acknowledged interests. A full set of representations and an accompanying vision document have been submitted to the Council via the strategicplanning@staffordbc.gov.uk inbox on 09/12/2022, which should be read in conjunction with this form and be considered as part of the overall response to the consultation.



Marlborough Road, Stone

Representations to Stafford Borough Council Local Plan
2020-2040 Preferred Options Consultation

December 2022

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Report title: Representations to Stafford Borough Council Local Plan 2020-2040 Preferred Options Consultation

Prepared by: James Kharade (Graduate Planner)

Contributors: Robert Gardner (Director)

Status: Final

For and on behalf of Avison Young (UK) Limited

1. Introduction

- 1.1 Avison Young is instructed by Taylor Wimpey UK Limited (Taylor Wimpey) ('the Client') to submit written representations in relation to land which it is promoting in response to Stafford Borough Council's Local Plan 2020-2040 Preferred Options consultation.
- 1.2 Taylor Wimpey is promoting its site at Marlborough Road, Stone (the 'Site') for residential development. As per our letter dated 20 May 2022, Avison Young submitted the site to the Council on behalf of Taylor Wimpey through the Council's 'Call for Sites' process. The site now benefits from a draft allocation in the Preferred Options document as per Policy 12 (site ID STO07).
- 1.3 The purpose of these representations is to reaffirm Taylor Wimpey's commitment to pursue residential development on the site and to demonstrate how development will be delivered.
- 1.4 Marlborough Road, Stone presents an exciting opportunity to deliver a sustainable and attractive urban extension to the south west of Stone which can deliver homes to help meet the needs of the local community. Situated in a highly sustainable location with high levels of connectivity to nearby services and facilities, the Site can deliver around 119 new homes forming a new community that will be based upon sustainable and healthy lifestyles and designed for climate resilience and adaptation.
- 1.5 The benefits of the scheme include the following:
- Provide a logical, appropriately scaled extension to Stone;
 - Provide a network of attractive and accessible green spaces which create opportunities for recreation, while offering the potential to improve access to existing local open spaces and the wider public footpath network;
 - Respect site character by sensitively retaining existing trees and hedgerows; using these to create a sense of maturity to the new residential extension;
 - Supplement retained landscape features with new tree and hedgerow planting, areas of wildflower grassland, ponds and swales to maximise the biodiversity value of the site;
 - Approximately 119 high quality market and affordable homes, providing a wide variety of house types and tenures to suit a wide range of households looking to start on the housing ladder, buy a family home or downsize encouraging social cohesion by providing the opportunity for residents to stay in Stone and maintain friendships and family networks
 - Sensitively relate to adjacent residential areas through considered building orientation and roof heights; and
 - Ensure the creation of a desirable place to live with a safe and attractive environment that builds upon the strength of the local community.
- 1.6 A Vision and Delivery Statement has been prepared for the Site and has been submitted separately to Stafford Borough Council as part of the previous Call for Sites Consultation. The Vision and Delivery Statement sets out the core placemaking principles for the Site and includes an Illustrative Masterplan showing how the Site will provide significant town-wide benefits and a long lasting positive addition to Stone. The Site is available immediately and free from any technical constraints which would preclude its early delivery. A copy of the Vision and Delivery Statement is provided at Appendix 1.

- 1.7 Whilst Taylor Wimpey is very encouraged and supportive of the proposed allocation of the Site, we would strongly urge the Council to increase the numbers of dwellings identified in the Draft allocation from 101 to 119. As clearly demonstrated in the accompanying Vision and Delivery Statement the Site can comfortably accommodate around 119 dwellings. This proposed increase will help to strengthen the Council's housing supply in a sustainable location. Furthermore, providing greater flexibility and resilience to adapt to changes both in the local market and wider economy.
- 1.8 Taylor Wimpey would be pleased to discuss any aspect of these representations in more detail if this would be of assistance to the Council and we look forward to engaging positively with the Council and other stakeholders in the ongoing preparation of the emerging Local Plan

2. Strategic Polices

Policy 1 – Development Strategy

- 2.1 Taylor Wimpey welcomes the Council's commitment to the delivery of new homes over the Plan period 2020-2040, and broadly supports the principles outlined within Policy 1.
- 2.2 In particular, Taylor Wimpey supports B5 of Policy 1 which establishes that part of the housing requirement for the Borough will be delivered by site allocations defined in Policy 12.

Policy 2 – Settlement Hierarchy

- 2.3 Taylor Wimpey supports the proposed settlement hierarchy established in Policy 2, including Stone's designation as a "Tier 2" settlement. Further, Taylor Wimpey supports the provision, under Part B, that new housing should be directed towards Stone.
- 2.4 The continued designation of Stone as a Tier 2 settlement, combined with the site allocation STO07 within Policy 12, will allow development to be delivered in sustainable locations and provide opportunities for Stone to grow and thrive.

3. Policy 12 Draft Allocation STO07

- 3.1 Taylor Wimpey supports the principle of Policy 12 and the allocation of the land under the reference STO07.
- 3.2 A masterplanning exercise has been undertaken, guided by technical inputs referred to below. This demonstrates that the site can accommodate up to 119 units, while achieving the necessary compliance with provision of open space and biodiversity net gain. We therefore would request that the site allocation within Policy 12 is updated to accommodate 119 units.
- 3.3 Contained with Appendix 2 is details of the specific sites allocated for residential development. The consultation document states that the 'proposed access from Marlborough Road needs to be checked/confirmed'. In 2015, planning permission was sought on the site for residential development accessed from Marlborough Road, which was refused on the grounds that the application fell outside the development boundary for Stone. No technical objections, including highways and access, were raised. Taylor Wimpey has since undertaken the necessary due diligence and there are no legal or technical barriers to achieving access to the site through Marlborough Road.

Compliance With Deliverability, Suitability and Achievability Tests

3.4 Paragraph 74 of the National Planning Policy Framework (NPPF) requires Local Planning Authorities (LPAs) to identify and update annually a supply of deliverable sites sufficient to provide a minimum of five years' worth of housing. Paragraph 68 also requires LPAs to identify a supply of deliverable sites for the first five years of the plan and specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the Plan.

3.5 Annex 2 of the NPPF outlines that for a site to be considered deliverable, it must be available now, a suitable location for development and is achievable within five years. As mentioned previously, the purpose of these representations is to maintain Taylor Wimpey's commitment to delivering residential development across the site and to demonstrate the tests set out in Annex 2 are complied with.

Availability

3.6 The Site is currently in two ownerships. Taylor Wimpey controls the access to the Site and another party owns the balance of the Site. Taylor Wimpey has a legal agreement in place with the land owner to develop the Site. This confirms not only that the landowners are willing to develop their land, but also that the future development of the site will be in the hands of a very experienced and successful national house builder. Taylor Wimpey will secure planning permission and deliver housing quickly assuming that the site is allocated for housing in due course.

3.7 Taylor Wimpey is currently building out its scheme at Burleyfields in Stafford for 1,400 units, therefore demonstrating a solid track record of housing delivery within the Borough. The modest scale of the development at Stone will result in a rapid delivery of housing without the need for major enabling works or provision of onsite infrastructure. It also envisaged that the site could be delivered as a single phase.

Suitability

3.8 The site is immediately adjacent to the urban edge of Stone, with existing residential areas immediately to the north of the site. The site is approximately 1.6 kilometres from Stone town centre.

3.9 Stone is identified by the settlement hierarchy in the Plan for Stafford Borough as a 'key market town' which is second in the Sustainable Settlement Hierarchy as set out by Policy SP3. There is a good range of services and facilities, including several supermarkets, banks, doctors surgeries, schools, shops, bars and restaurants. The town lies approximately 10km to the north west of Stafford.

3.10 The adopted Development Strategy has identified Stone as one of the most sustainable locations to distribute new development within the Borough. The New Local Plan also proposes to identify Stone as 'Tier 2' in the settlement hierarchy (i.e. the most sustainable settlement after Stafford). It is, therefore, clearly a suitable and sustainable, preferred, location for further housing growth in the Borough.

3.11 There are two primary schools within 800m of the site and a middle school approximately 500m away from the site. The site is also approximately 1.45 kilometres from the Mumbles Day Nursery. The nearest GP surgery is in the town centre approximately 1.7 kilometres to the north east.

3.12 There is a local centre on Pirehill Lane approximately 250m to the south of the site which contains a convenience store, two takeaway restaurants, a barber, a hair and tanning salon, an opticians, a laundrette, and a pet shop. There is another local centre 800m to the south of the site on Eccleshall

Road, which consists of a Co-operative food store, an off license, a pharmacy, a butchers, a bakery, a florist, a hair salon and a pet shop.

- 3.13 The nearest train station is located to the north-west of Stone town centre, approximately 2.9km north-east of the site. Stone railway station offers regular West Midlands Trains services to Birmingham New Street (via Stafford and Wolverhampton) and Crewe. The nearest bus stop is located on Eccleshall Road approximately 950 metres to the north east of the site. The bus stop offers regular services to Stafford Town Centre, Eccleshall, Yarnfield and Swynnerton during daytime hours (route 102, 102A and 103). Further to the north west on Eccleshall Road and Tilling Drive bus stops provide services (every 20-30 minutes) to Hanley (route 101 'the knotty').
- 3.14 The site now has a draft allocation in the Preferred Options document, and is, therefore, clearly in a sustainable location for residential development.

Technical Merits

- 3.15 As discussed previously, the site has a history of applications for residential development. The last application in 2015 was refused on grounds of the site being located outside the development boundary. No technical objections were received or used as a reason for refusal. We therefore assume that, given the draft allocation, the site does not have any major constraints which would prohibit development. Regardless, Taylor Wimpey has prepared a suite of preliminary documents to be produced to demonstrate that the site is suitable and deliverable. These are addressed in turn below.

Flood Risk and Drainage

- 3.16 Avison Young undertook a Flood Risk Assessment and Drainage Appraisal of the site in July 2022. It has concluded that the entire site is located wholly within Flood Zone 1, and there is low, very low or negligible risk of flooding from other sources, including surface water. Therefore, the overall flood risk to the site is assessed as very low.
- 3.17 The site is proposed to be drained by separate drainage networks for foul and surface water. Surface water from the development must be managed by a SuDS scheme in accordance with the local and national policies on SuDS. Site specific soakaway and infiltration tests would need to be assessed on site to understand the requirements to restrict peak surface flows.

Air Quality

- 3.18 BWB undertook an air quality constraints review and site suitability assessment in May 2022. It is considered that industrial and odour sources of pollution are unlikely to affect the site with regard to air quality and amenity for future residents. No exceedances of particulate matter were recorded across the site from the M6 and no mitigation was recommended. Air quality is not considered to be a constraint to development.

Arboriculture

- 3.19 A total of 11 trees, six tree groups and five hedgerows were surveyed by FPCR in July 2022. Six trees on the site were classified as high quality, including three along the central hedgerow and three on the site boundary, with a further high quality tree contained within the woodland to the north west of the site. All trees are proposed to be incorporated into the landscape scheme and appropriate mitigation would be used during construction. A tree retention and protection plan would be submitted with any application. As such, arboriculture is not considered to be a constraint to development.

Ecology

- 3.20 In July 2022, FPCR undertook an Ecological Appraisal of the site. No records of protected or notable species were returned for the site itself. Whilst habitat loss is unavoidable, additional habitat creation will be incorporated within areas of green infrastructure and public open space. A biodiversity net gain assessment has been undertaken and demonstrates that a net gain in biodiversity over 10% could be achieved through the proposed masterplan.

Landscape

- 3.21 A Baseline Landscape and Visual Appraisal has been undertaken by Randall Thorp which concludes that residential use is typical of the surrounding character and local area context, and the proposed HS2 route to the south of the site would alter the local landscape, beyond which is the M6. Recommendations are to retain as such vegetation on the boundaries, particularly to the southern and western boundaries, ensure development provides an attractive view in any opened up views from Marlborough Road and Spode Close, and consider single storey or reduced ridge height dwellings towards the southern and western fringes. Landscape is not considered to be a constraint to development.

Noise

- 3.22 BWB undertook a Noise and Vibration Constraints Assessment of the site, which assessed current potential sources of noise such as the M6, and future noise conditions when HS2 is delivered. No excess noise levels were recorded at receptors across the site and BWB concluded the site is suitable for residential development, subject to a detailed assessment for noise and vibration.

Transport

- 3.23 CBO undertook a Transport Appraisal and concluded that no fundamental traffic implications to the local highway network would be caused from development of the site. The report further demonstrated the sustainability of the site through pedestrian accesses and connections to local public transit routes.
- 3.24 CBO considered the proposed access via Marlborough Road to be suitable for a development of the proposed size, and the Marlborough Road junction with Pirehill Lane would have ample capacity to accommodate traffic associated with the development. Therefore, impacts to the local highway network and the access to the site is not considered to be a constraint to development.

Other Technical Matters

- 3.25 A desk-based archaeological assessment was carried out by ULAS in March 2022, which concluded that the Historic Environment Record records very few archaeological sites within 1km of the site, and the few excavations conducted within the vicinity of the site revealed no archaeological deposits or exposed ridge and furrow or post-medieval and modern field boundaries.
- 3.26 Kernon Countryside undertook an Agricultural Land Quality survey in May 2022, which concluded that although the site does comprise of some 'best and most versatile' agricultural land, as the site is under 5ha in size, the proposals are classified as 'not significant' and to be of 'minor magnitude' impact on the Environment Agency's IEMA guidance. Agricultural land is not therefore seen as a constraint to development.

Achievability

- 3.27 As set out above, there are no significant constraints across the site that prevent residential development from being delivered.
- 3.28 Taylor Wimpey would be able to start to deliver housing on site shortly after the grant of planning permission and immediately following site preparation works and the discharge of any relevant planning conditions.
- 3.29 Therefore, there is a realistic prospect of housing being delivered on the site within five years.

4. Delivery Strategy

- 4.1 As clearly set out in the accompanying Vision and Delivery Statement, Taylor Wimpey has an agreement with the landholder to promote it through the Local Plan Review process.
- 4.2 This confirms the willingness of both the landowner and Taylor Wimpey to develop the site.
- 4.3 Taylor Wimpey's experience demonstrates that it has a proven track record of planning and delivering high quality, schemes, such as Burleyfields.
- 4.4 Given the above, it is clear that the Site is available in line with the Planning Practice Guidance and in being owned and controlled by a landowner/ developer partnership formed with the express intention of developing the Site. As such there are no legal or ownership impediments to development and the Site is 'available'. Consequently, delivery on Site could begin early on in the Local Plan period.
- 4.5 In developing the Illustrative Masterplan for the Site, consideration has been given to the current and likely future planning policy requirements and these have either been accommodated or allowed for in the conceptual layout of the scheme.
- 4.6 Taylor Wimpey would seek to deliver the site within the first 5 years of the plan being adopted. We have set out in the Vision and Delivery Statement an indicative programme for delivery on the Site. It should be noted that these timescales can be brought forward should it be agreed with the LPA through pre-application discussions that a planning application can be submitted earlier.

5. Summary and Conclusion

- 5.1 Taylor Wimpey supports much of the Council's emerging Local Plan. Stone's status as a Tier 2 settlement, to which residential development should be directed, is welcomed.
- 5.2 Taylor Wimpey also welcomes the proposed allocation of the site under emerging Policy STO07. At present, the draft policy identifies a site capacity of 101 units. Taylor Wimpey maintains this should be increased to 119. This increase would deliver additional homes without detriment to any acknowledged interests.
- 5.3 Taylor Wimpey remains unreservedly committed to the delivery of housing on the site. These representations demonstrate that it is deliverable, suitable and achievable within the first five years of the Plan period,

- 5.4 Taylor Wimpey therefore requests that the allocation contained within Policy 12 is updated to reflect the full potential of the site.

Avison Young
December 2022

Avison Young

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**Taylor
Wimpey**

Marlborough Road Stone

Vision and Delivery Statement

December 2022





For more information contact:

Taylor Wimpey



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The project team:

- **Avison Young** – Town Planning, Flood Risk and Drainage, and Utilities;
- **Randall Thorp** – Masterplanning and Landscape and Visual;
- **BWB** – Air Quality and Noise;
- **CBO** – Transport;
- **FPCR** – Ecology, Biodiversity and Arboriculture;
- **University of Leicester** – Archaeology; and
- **Kernon Countryside** – Soil and Agricultural Land.



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1.0 Introduction



Figure 1: Site Location Plan



1.0 Introduction

The land at Marlborough Road provides an ideal opportunity to create a sustainable and attractive urban extension to the south west of Stone which can deliver homes to help meet the needs of the local community. The site is located to the south west of Stone and is in close proximity to two primary schools and a middle school, as well as a number of shops, services and community facilities.

Taylor Wimpey is a national and respected housebuilder who is committed to working with Stafford Borough Council and the local community to design a high-quality development which delivers significant social, environmental, and economic benefits for the town.

This Vision and Delivery Statement has been prepared to demonstrate that the land at Marlborough Road, Stone is available, suitable, and achievable, therefore, deliverable in accordance with the definitions in national policy and guidance.

Taylor Wimpey considers that the land provides an ideal opportunity to create a sustainable, distinctive, and attractive residential community which will deliver homes to help meet the needs of the local people.

This document provides a vision for the development of a sustainable residential development. It explains the technical work which has been carried out to inform our emerging vision for the development of the site ahead of further refinement and engagement with Stafford Borough Council and the local community.

Taylor Wimpey is one of the UK's leading housebuilders, being responsible for the delivery of over 15,000 homes annually. It is committed to engaging with local communities to shape developments which best meet local needs and requirements.

This Vision and Delivery Statement has been prepared in the context of the on-going review of the Borough Local Plan. Taylor Wimpey considers that the site should be allocated for residential development through the Local Plan review process, as it will assist in meeting local housing needs.

This document is intended to inform the basis of further discussions which will hopefully enable the proposals to be refined and supported through the Local Plan review.

Taylor Wimpey has appointed a consultant team to assist in developing a vision for the site. The project team members comprise:

- **Avison Young** – Town Planning, Flood Risk and Drainage, and Utilities;
- **Randall Thorp** – Masterplanning and Landscape and Visual;
- **BWB** – Air Quality and Noise;
- **CBO** – Transport;
- **FPCR** – Ecology, Biodiversity and Arboriculture;
- **University of Leicester** – Archaeology; and
- **Kernon Countryside** – Soil and Agricultural Land.

This document is structured as follows:

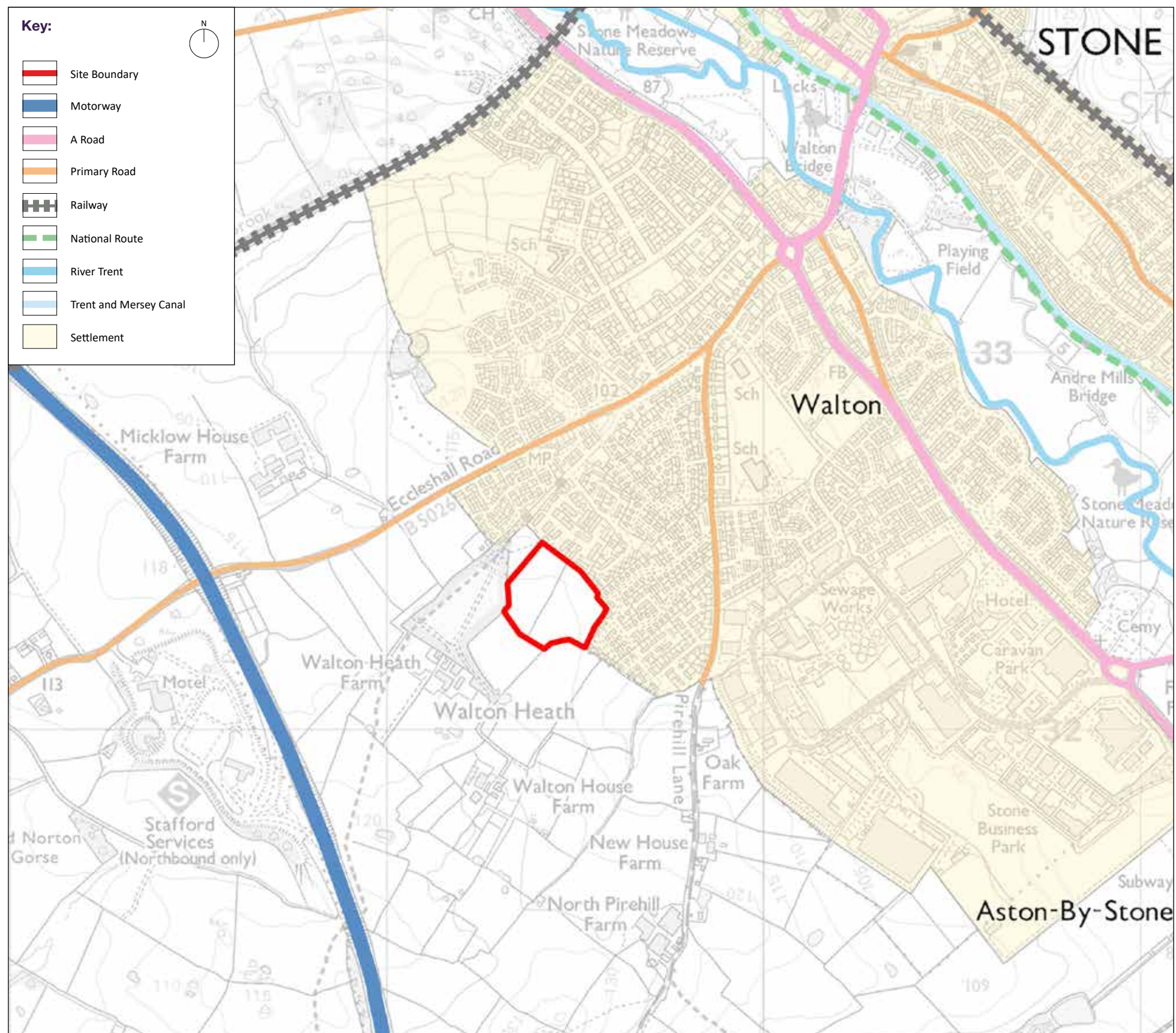
- **Section 2** describes the site and its surroundings, the planning history and the policy context;
- **Section 3** outlines Taylor Wimpey's vision for the site and the benefits that can be delivered from residential development;
- **Section 4** demonstrates that the site is sustainable, available now, in a suitable location for development, and is achievable; and
- **Section 5** provides a summary of this Vision Document and concluding comments.



2.0 Background



Figure 2: Site Context Plan



2.0 Background



With a population exceeding 16,000¹, Stone is the second largest town in the Borough, behind only Stafford. It is identified as a ‘Key Market Town’ in the adopted Borough Plan. There is a good range of services and facilities, including several supermarkets, banks, doctors surgeries, schools, shops, bars and restaurants, making it one of the most sustainable locations for housing in the Borough. Stone is located approximately 8km to the north of Stafford.

Site and Context

The site extends to approximately 4.8 hectares and is irregular in shape. It is located to the south west of Stone, approximately 1.5km from the town centre, and is currently outside the development boundary for Stone.

The site comprises a single agricultural field parcel. A hedgerow runs centrally through the site from north to south, partially dividing the site. Four trees are located along the central hedgerow, although one has died. There are two trees of significance on the northern boundary, which are subject to a Tree Preservation Order. A drainage ditch runs along part of the northern boundary within the site boundary.

To the north and east of the site is the existing residential area of Walton, which forms the urban edge of southern Stone.

To the south of the site, beyond the existing hedgerow boundary, is Walton Heath Farm, which is surrounded by several large agricultural fields. The M6 is located approximately 700m to the southwest of the site. The proposed HS2 Phase 2A route also passes approximately 450metres to the south west of the site.

To the west of the site is an area of vegetation, featuring small trees, bushes and shrubs, beyond which is existing housing. A footpath passes through this small piece of land, connecting recreational land at Common Lane to the residential development at Spode Close.

¹. 2011 Census. Office for National Statistics

Planning History

In 2015, David Wilson Homes submitted a full planning application for development of the site for 114 dwellings, accessed from Marlborough Road, with an emergency access and footpath link via Spode Close, under application reference 15/21873/FUL.

Planning permission was refused on 16th March 2015, on the grounds that the Council could demonstrate a 5 year housing land supply with 20% buffer and the amount of housing committed in Stone already exceeded the requirement in the adopted Plan.

However, there were no technical or design related reasons for refusal, and the Officer's report concluded that Marlborough Road was an acceptable point of access.

Planning Policy

The Development Plan for Stafford Borough comprises the Plan for Stafford Borough – Part 1 (2011-2031) (adopted in June 2014), the Plan for Stafford Borough – Part 2 (2011-2031) (adopted in January 2017), and the Stone Neighbourhood Plan (2016-2031) (made May 2021).

Plan for Stafford Borough – Part 1

The Plan for Stafford Borough – Part 1 sets out the Borough's vision, spatial and strategic development policies and allocates development sites across the Borough until 2031.

It establishes a 'Sustainable Settlement Hierarchy' which states that the majority of development will be delivered in the following locations:

- County Town of Stafford;
- Market Town of Stone;
- Key Service Villages.

Stone is identified as a 'key market town' and is second in the Sustainable Settlement Hierarchy, behind only Stafford. Stone is therefore one of the most sustainable locations for housing, employment and service provision within the Borough.

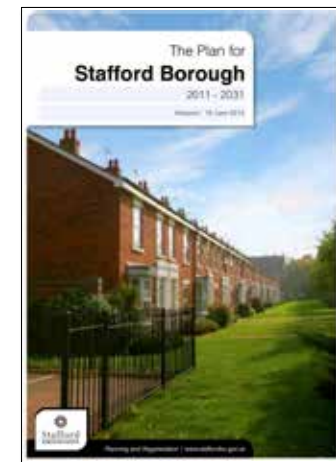
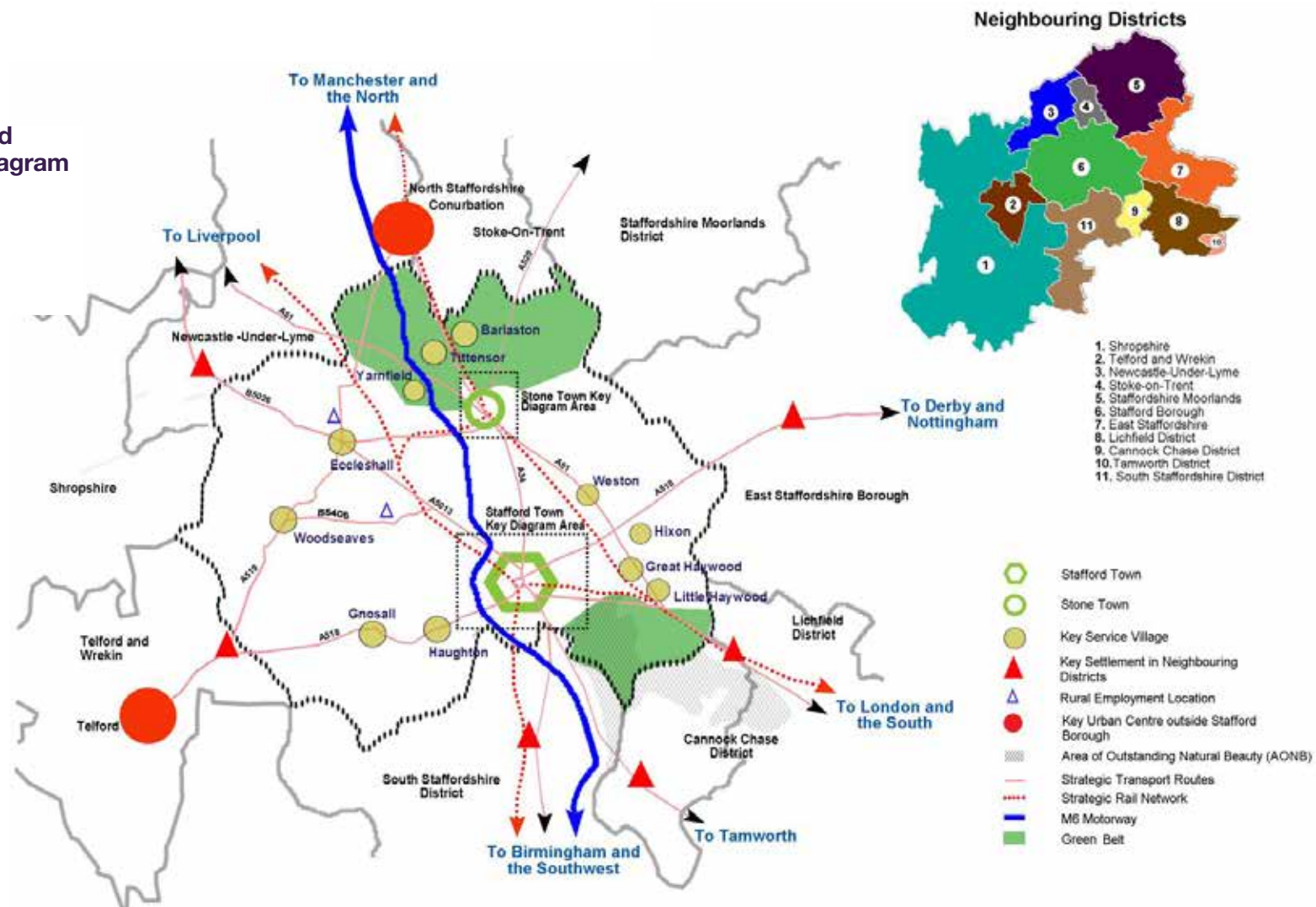


Figure 3: Stafford Borough Key Diagram





Plan for Stafford Borough – Part 2

The Plan for Stafford Borough – Part 2 establishes settlement boundaries for each of the settlements in the Borough and guides where development will take place across the Borough until 2031.

Stone Neighbourhood Plan

The Stone Neighbourhood Plan was prepared by the Town Council. It was formally ‘made’ and became part of the Development Plan on 20 July 2021. The Neighbourhood Plan sets out the direction for Stone until 2031. It designates areas of local green space and sets out detailed policies on a range of matters.

New Stafford Borough Local Plan

In July 2017, the Council began the process of preparing the new Stafford Borough Local Plan 2020-2040, which will include policies for the development and protection of land, site allocations, and a new development strategy.

A ‘Call for Sites’ exercise was carried out in early 2018. The Council carried out a further consultation on the ‘New Local Plan - Scoping the Issues’ and ‘New Local Plan – Settlement Assessment’ reports in mid-2018. The Council consulted on its ‘Issues and Options’ document in April 2020.

It is anticipated that the Council will consult on its ‘Preferred Options’ Local Plan between October and December 2022.

Figure 4: Policies Map for Stone

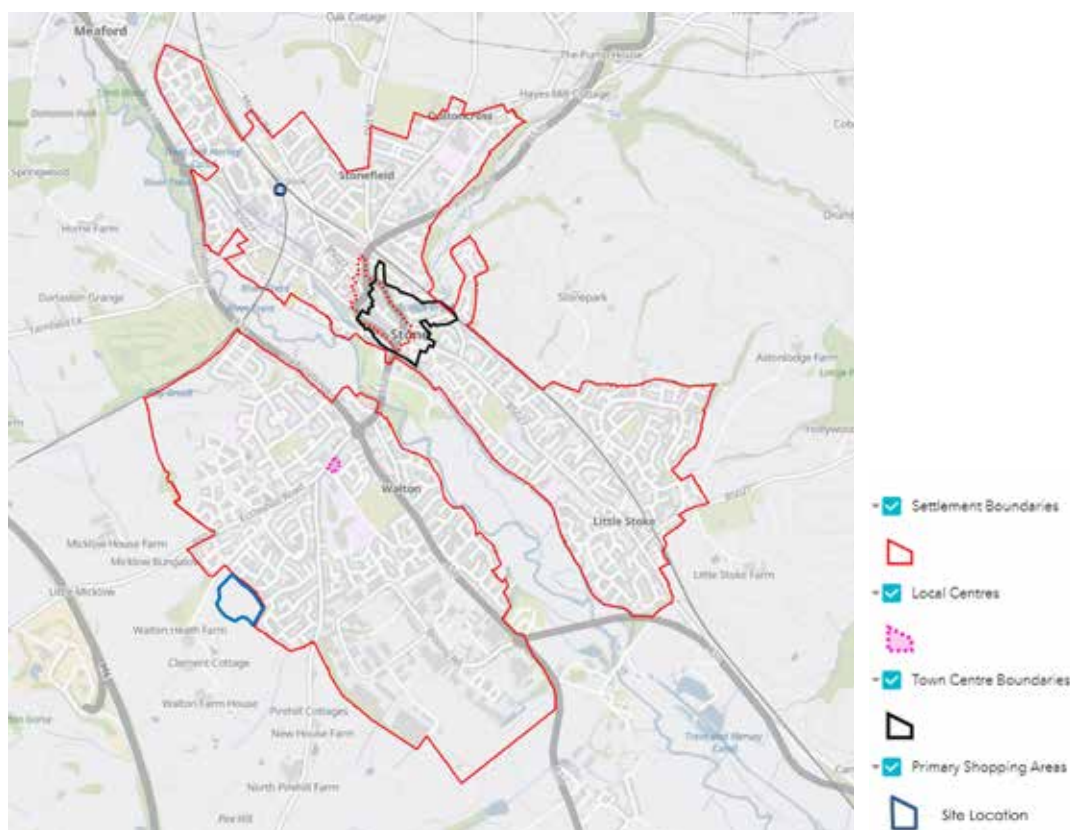
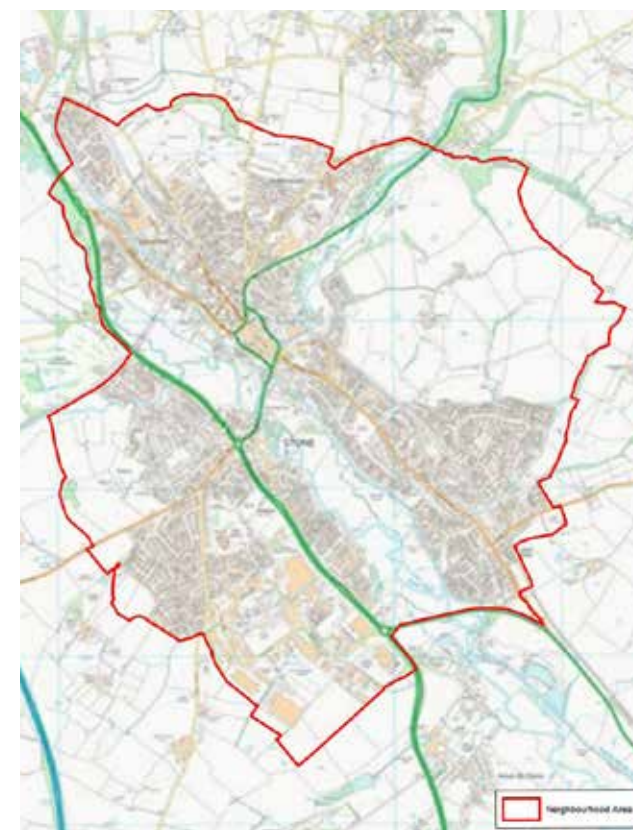


Figure 5: Neighbourhood Area Plan



National Policy and Guidance

The UK is facing a housing crisis which has significant social and economic implications. The Government recognises the seriousness and urgency of the problem and has as a result made tackling this issue one of its top priorities.

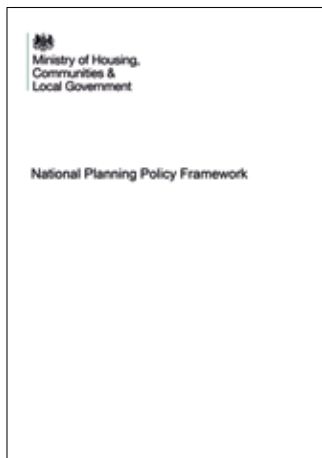
A key focus of the revised National Planning Policy Framework (NPPF) (2021) is, therefore, to help boost significantly the number of new homes which are built and to accelerate the rate of housing delivery.

In that context, the NPPF has introduced a new 'standard method' for the assessment and calculation of local housing need.

The NPPF is clear that Councils must identify a good mix of sufficient sites to meet identified housing needs.

It indicates that small and medium sized sites can make an important contribution to meeting housing needs quickly. It also acknowledges that planning for larger scale development can often achieve the delivery of large numbers of homes. This includes significant extensions to existing villages and towns, provided they are well located and designed and supported by the necessary infrastructure.

The NPPF supports the delivery of housing in villages in order to enhance or maintain the vitality of rural communities by allowing them to grow and thrive. It recognises that the provision of new housing in smaller settlements can assist in supporting local services and facilities.



Stone as a Location for Growth

The Need for Housing

The Stafford Plan 'Issues and Options' consultation identifies a minimum local housing need of 408 dwellings per annum in the Borough, calculated using the standard method, at the time. This generated a need for at least 8,160 dwellings to be delivered within the Borough between 2020 and 2040.

National policy is clear that the standard method is the starting point and that other considerations and the particular local circumstances may mean that housing need is higher than indicated by the standard method alone.

In Stafford there are clearly circumstances and sound reasons for planning for higher levels of housing provision in the Borough, including to meet the Borough's affordable housing needs.

Stone as a Location for Growth

The adopted Plan identifies Stone as a 'Market Town' and the second most sustainable location for housing employment and service provision in the Borough after the main town of Stafford.

The 'Issues and Options' Local Plan consultation document acknowledges that Stone acts as a hub to the surrounding areas, has a vibrant town centre and strategic employment sites that offer employment locally.

The emerging settlement hierarchy for the new Local Plan continues to identify Stone as the second largest town in the Borough. The town contains a comprehensive range of services and facilities.

Approximately 20% of the Borough comprises land in the Green Belt. The site is not constrained by the Green Belt unlike other land to the north of Stone.

Capacity for Growth

The settlement has capacity to accommodate an increase in the number of households without placing undue pressure on existing infrastructure. Development in and adjoining the settlement could support improvements to or the expansion of infrastructure in the town where required through Section 106 contributions.

Stone is clearly a sustainable location with the capacity for housing growth having regard to national policy and adopted and emerging local policy. Indeed, the provision of additional housing in the settlement would support local service provision, including the vitality of existing shops, pubs and services.



Will Taylor Wimpey Invest in Stone?

Taylor Wimpey UK Limited is a dedicated homebuilding company with over 140 years' experience; we have an unparalleled record in our industry. We aim to be the homebuilder of choice for our customers, our employees, our shareholders and for the communities in which we operate.

We have expertise in land acquisition, home and community design and the development of supporting infrastructure which improves our customers' quality of life and adds value to their homes.

We draw on our experience as a provider of quality homes but update that, to the expectations of today's buyers and strive to provide the best quality homes, while setting new standards of customer care in the industry.

With unrivalled experience of building homes and communities Taylor Wimpey today continues to be a dedicated house building company and is at the forefront of the industry in build quality, design, health and safety, customer service and satisfaction.

Taylor Wimpey is committed to creating and delivering value for our customers and shareholders alike. Taylor Wimpey combines the strengths of a national developer with the focus of small local business units. This creates a unique framework of local and national knowledge, supported by the financial strength and highest standards of corporate governance of a major plc.

Taylor Wimpey works closely with landowners, local authorities, politicians and local communities to deliver high quality new homes. It has a strong track record, including within the local area, where it is currently building out its scheme at Burleyfields in Stafford for 1,400 units.





3.0 The Vision





3.0 The Vision

Vision Statement

Taylor Wimpey's overarching vision is:

To create an attractive and logical residential extension to Stone, offering a choice of high quality new homes, set within a permeable network of footpaths and multi-functional green spaces, which can complement and enhance the local neighbourhood with the potential to improve accessibility between existing residential areas to the south of the site and recreational land at Walton Heath.

Key Design Principles

Taylor Wimpey's vision for the site seeks to deliver the following key design principles:

- Provide a logical, appropriately scaled extension to Stone;
- Provide a network of attractive and accessible green spaces which create opportunities for recreation, while offering the potential to improve access to existing local open spaces and the wider public footpath network;
- Respect site character by sensitively retaining existing trees and hedgerows; using these to create a sense of maturity to the new residential extension;
- Supplement retained landscape features with new tree and hedgerow planting, areas of wildflower grassland, ponds and swales to maximise the biodiversity value of the site;
- Deliver quality new homes including both smaller properties and larger family homes which make best use of the land and contribute to the needs of the area;
- Sensitively relate to adjacent residential areas through considered building orientation and roof heights; and
- Ensure the creation of a desirable place to live with a safe and attractive environment that builds upon the strength of the local community.

Figure 6: Opportunities and Constraints Plan



Site Opportunities and Constraints

The vision for the site derives from an analysis of the characteristics of the site, its context and the opportunities and constraints that exist.

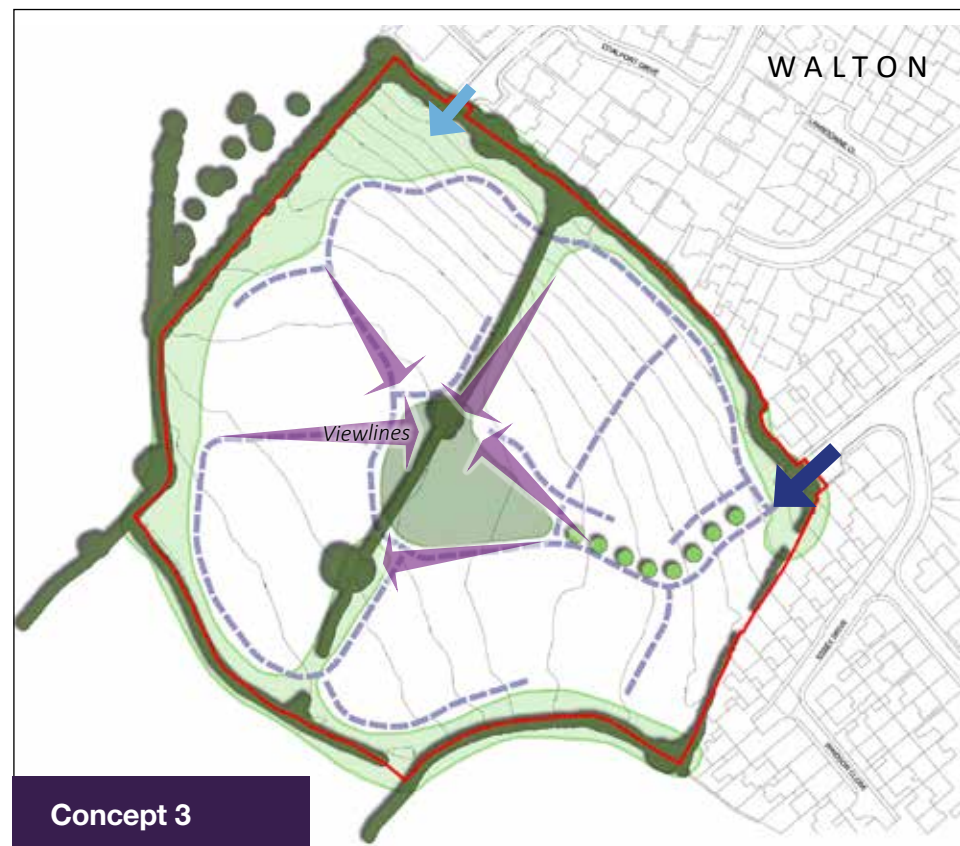
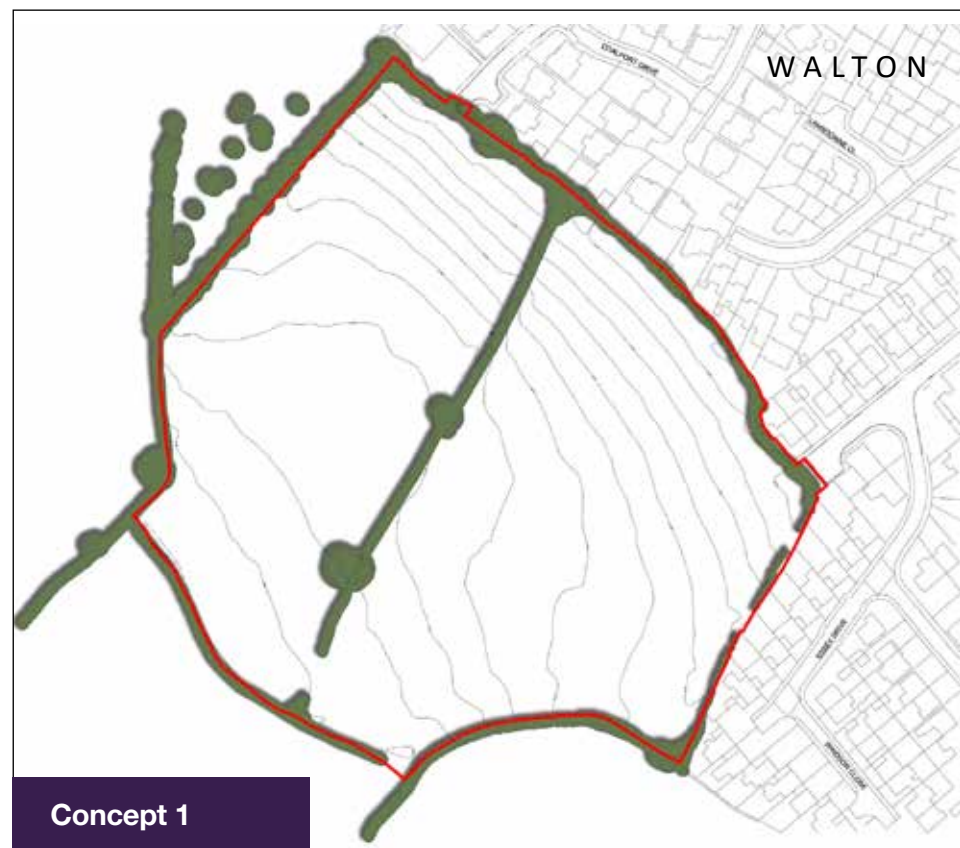
Opportunities

- The development of the site for residential purposes would provide logical infill and 'rounding-off' to the existing settlement form, which would define a clear, defensible south-western boundary to Stone.
- Safe and viable vehicular access points into the site can be taken from Marlborough Road and Spode Close.
- There is potential to provide public access routes through the site which may be able to provide links to wider open spaces and the public footpath network, to the benefit of the wider local community.
- The topography of the site provides potential for the creation of a range of sustainable drainage features across the site. The sustainable drainage systems could comprise of basins, swales and/or rain gardens. These features would reduce the risk of flooding while also improving amenity and biodiversity.
- Mature hedgerows at the southern and western site boundaries provide established, natural defined containment to the site. Sensitively planned development will retain legibility of the historic field pattern.
- Aligning view lines through the site to terminate on existing mature trees within the site and at the site boundaries will provide a sense of maturity to the proposed residential area.

Constraints

- There are two trees at the north eastern site boundary which are subject to a Tree Preservation Order. These should be retained within the public realm to ensure their long-term retention.
- The site is in part bisected by an established field boundary hedgerow with trees. This provides an established ecological corridor through the site. The majority of the hedgerow should be retained where possible.
- Ground levels within the site rise as they extend away from the existing settlement edge, before plateauing further to the south west. This results in the site feeling strongly associated with the urban area.
- Development proposals consider the use of reduced ridge height dwellings or single/1.5 storey properties at appropriate locations along the south-eastern edge of the site to enable the proposed housing to sit comfortably in its setting.
- The site interfaces with existing bungalows along its south-eastern boundary. Development along this boundary will require consideration to provide appropriate separation distances for privacy and to avoid overlooking.
- The masterplan has been developed to be sensitive to the site interface with wider open land to south-west, including an enhanced landscape buffer to create an appropriate transition between the settlement edge and wider open countryside.
- Traffic noise from the M6 has been considered in the design and layout of the site.
- An existing drainage ditch along the northern boundary of the site would be retained.

Figure 7: Masterplan Concepts



Key Design Concepts

The concepts which underpin the masterplan vision respond directly to the characteristics of the site. Four key concepts can be identified:



Concept 1

Retain and sensitively accommodate existing landscape features: TPO trees, unprotected trees and hedgerows.

Concept 2

Create a multi-functional green infrastructure network for the purposes of recreation, biodiversity and sustainable drainage which is anchored by a new central 'green' at the heart of the development.

Concept 3

Provide safe and viable road access, taking primary access from Marlborough Road and emergency access from Spode Close. Align the internal road network to create a strong sense of place by utilising a combination of tree-lined streets and framed views to established trees within the site.

Concept 4

Create a series of defensible residential development blocks, designed to provide active streetscapes and to overlook public open spaces, while protecting existing residential amenity and creating a visually pleasing outer edge to the development.

Illustrative Masterplan

Taylor Wimpey has developed an illustrative masterplan for land at Marlborough Road which is sensitive to the opportunities and constraints of the site. The resulting vision will deliver a comprehensively planned and high quality residential extension to Stone.

The masterplan is landscape-led, ensuring in the first instance, that the greenspace network is planned and shaped to respond sensitively to the valued landscape features of the site.

Existing hedgerows and trees will be retained across the site. These will add a sense of maturity and character to the development. Open spaces will be retained at low lying parts of the site to maximise opportunities for sustainable drainage ponds. A central green will be created at the heart of the development, providing both recreation and visual amenity benefits, and connectivity between open spaces will be prioritised for the benefit of ecology and pedestrian permeability. The central green provides scope for on-site play provision, alternatively the scheme would contribute to improving existing local play facilities, for example, at Spode Close, if that was preferred.

Proposed housing parcels are designed to sit appropriately within the multi-functional greenspace network, with new housing benefiting from attractive views over greenways and landscape corridors.

The housing parcels are designed to provide outward facing, secure development blocks, or to back onto existing housing immediately adjacent to the site to ensure residential security is retained. Any future detailed housing layout will be designed to ensure that residential amenity of existing nearby properties will be respected Whilst providing appropriate levels of amenity for new residents.

It is anticipated that new homes will comprise a mix of two- to five- bedroom properties. These will include an appropriately selected mix of detached, semi-detached and terraced units at between 1- to 2.5- storeys in height. Properties with lower ridge heights will be included, as appropriate, where new housing interfaces with existing bungalows, or is located on higher land at the development fringe which interfaces with the wider rural setting. New homes will primarily be constructed of red brick with grey or red roof tiles to complement building materials found in the immediate context of the site.

The new homes will be accessed from Marlborough Road, with a controlled emergency vehicle access provided onto Spode Close. A central loop road will meander through the development, aligned to frame views to retained trees and the proposed network of green spaces, resulting in a characterful route with a distinct sense of place. A series of secondary roads and private drives will be provided extending beyond the main loop. The character of these routes would be tailored through the detailed design process to provide an appropriate transition between the development and the wider open countryside to the south west.

The illustrative masterplan demonstrates how the site can be sensitively developed to provide up to 119 new homes for Stone, at a density of up to 35 dwellings per hectare, which will complement the development density found in the immediate local context.

Illustrative Masterplan Key

-  Site boundary
-  Existing vegetation
-  Existing ditch to be retained
-  Built form (indicative)
-  Potential single storey/reduced ridge heights
-  Proposed primary vehicular access
-  Proposed pedestrian, cycle and emergency access
-  Primary loop road
-  Secondary roads / private drives
-  Pedestrian / cycle route
-  Potential pedestrian links to be explored
-  Public open space
-  Public realm tree planting (indicative)
-  Garden tree planting (indicative)
-  Native hedgerows to be maintained as a hedgerow, at a max height of 1.0m - 1.2m (indicative)
-  Potential Local Equipped Area for Play
-  SuDS ponds / swales (indicative)



Figure 8: Illustrative Masterplan



Land use summary (approximate measures)

Site area:	4.8 ha
Proposed net developable area (inc roads):	3.4 ha
Greenspace / POS:	1.4 ha
<i>119 dwellings @ 35 dph</i>	

Figure 9: Sketch Illustrations

View 1: Illustrative sketch of the play area



View 2: Illustrative sketch of the green edge



Benefits of Development

Development of the site could provide a range of social, economic and environmental benefits including:



Social

- Mix of house types and sizes (e.g. smaller starter homes and larger family homes);
- A policy compliant 40% affordable housing will be provided on site, contributing to the Borough's need;
- Other financial contributions, which might be towards improvements to local services and infrastructure and other initiatives pursued by the Town Council.

Economic

- Additional spending capacity and creation of a more balanced age profile in the village to support local businesses;
- Increased patronage of local services and facilities to support their vitality, viability and long-term sustainability;
- Significant jobs during the construction phase of development;
- Significant revenue from the New Homes Bonus and Council Tax.

Environmental

- A quality development which respects the character and setting of Stone;
- The retention of natural features (particularly mature trees and hedgerows);
- On-site public open space to potentially include elements such as children's play equipment;
- Improvements to connectivity, supporting sustainable transport choices for access to local services and facilities;
- On-site ecology enhancements capable of delivering net gain for biodiversity.



4.0 Deliverability



4.0 Deliverability



Paragraph 68 of the National Planning Policy Framework (NPPF) requires Local Planning Authorities (LPAs) LPAs to identify a supply of deliverable sites for the first five years of the Plan and specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the Plan.

Accordingly, the NPPF establishes that to be considered deliverable, sites for housing should be:

- **available** now;
- offer a **suitable** location for development now, and;
- be **achievable** with a realistic prospect that housing will be delivered on the site within five years.

Is the site available?

Taylor Wimpey has an agreement with the landholder to promote it through the Local Plan Review process.

This confirms the willingness of both the landowner and Taylor Wimpey to develop the site.

Taylor Wimpey is currently building out its scheme at Burleyfields in Stafford for 1,400 units, therefore demonstrating a solid track record of housing delivery within the Borough.

The modest scale of the development at the site would support rapid delivery of housing without the need for major enabling works or provision of onsite infrastructure. It also envisaged that the site could be delivered as a single phase.

There is no legal ownership or other technical impediments. Accordingly, the site is available now in NPPF terms.

Taylor Wimpey would seek to deliver the site within the first 5 years of the plan being adopted. We have set out below an indicative programme for delivery on the Site. It should be noted that these timescales can be brought forward should it be agreed with the LPA through pre-application discussions that a planning application can be submitted earlier.

Indicative Site Timescales:

- **Submission of Outline Application: January 2024**
- **Obtaining a Resolution to Grant: October 2024**
- **Agreement of S106 and Grant of Outline Planning Permission: December 2024**
- **Submission of Reserved Matters Application: January 2025**
- **Approval of Reserved Matters Application: June 2025**
- **Commencement of Ground and Enabling Works: July 2025**
- **Completion of First Dwelling: April 2026**
- **Occupation of First Dwellings: May 2026**
- **Completion of Scheme: January 2029**



Is the site suitable?

The site is immediately adjacent to the urban edge of Stone, with existing residential areas immediately to the north of the site. The site is approximately 1.6 kilometres from Stone town centre.

Stone is identified by the settlement hierarchy in the Plan for Stafford Borough as a 'key market town' which is second in the Sustainable Settlement Hierarchy as set out by Policy SP3. There is a good range of services and facilities, including several supermarkets, banks, doctors surgeries, schools, shops, bars and restaurants.

The town lies approximately 10km to the north west of Stafford. The adopted Development Strategy has identified Stone as one of the most sustainable locations to distribute new development within the Borough. The New Local Plan also proposes to identify Stone as 'Tier 2' in the settlement hierarchy (i.e. the most sustainable settlement after Stafford). It is, therefore, clearly a suitable and sustainable, preferred, location for further housing growth in the Borough.

The site will provide a high-quality development that will incorporate new greenspace; including a village green, footpaths and cycleways.

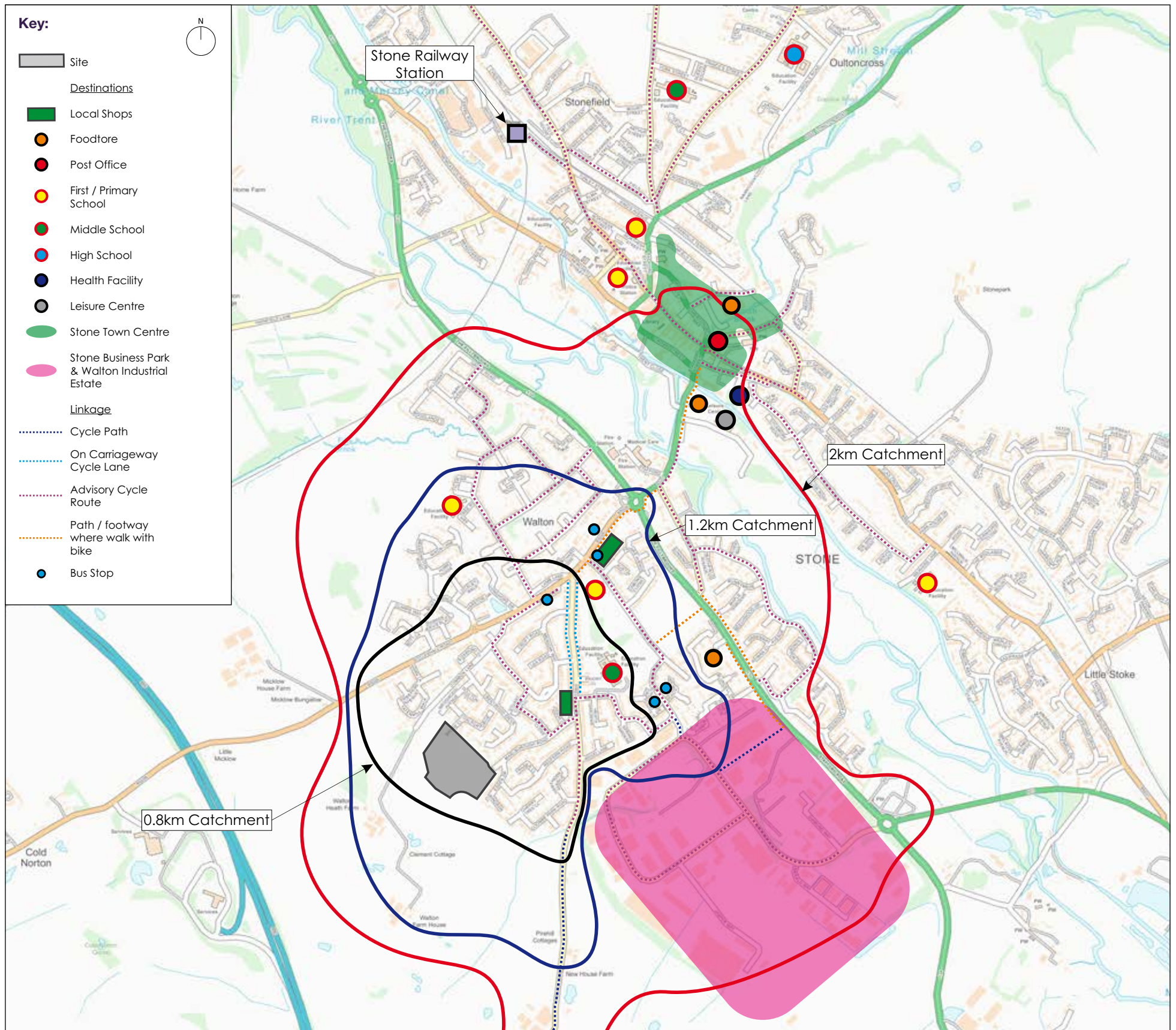
Is the site achievable?

The masterplan illustrates that this site could deliver approximately 119 dwellings, contributing towards meeting the housing needs of the Borough.

An assessment of the constraints and opportunities of this site has been undertaken, demonstrating that the site is deliverable and achievable. Where any potential constraints have been identified, Taylor Wimpey has considered the necessary mitigation measures and required investment in order to overcome any deliverability barriers.

If this site is allocated for residential development through the local plan review, a planning application could be submitted for the residential development of the site very quickly, following engagement with the community. Taylor Wimpey would be able to start to deliver housing on site shortly after the grant of planning permission and immediately following site preparation works and the discharge of any relevant planning conditions.

Figure 10: Accessibility Drawing



Physical Constraints and Technical Matters

Taylor Wimpey has commissioned a range of technical assessments to demonstrate that there are no physical constraints that would make the site unsuitable for residential development including the following disciplines.

Highways

Taylor Wimpey has taken advice from a specialist transport consultant, CBO. The site would be accessed from an extension to Marlborough Road. CBO has advised that the width of Marlborough Road is suitable to provide access for up to 119 dwellings. It is also suitable for use by cyclists. In addition, any access would incorporate footways to both sides, which would link to the existing footway on the north side of Marlborough Road and, once pedestrians have crossed the existing turning head, the footway on the south side.

In respect of the 2015 David Wilson Homes scheme for the site, Highway Officers at the County Council concluded that access from Marlborough Road was acceptable and caused no undue impacts to the highway network. Officers at the Borough Council also concluded that this would not give rise to unacceptable impacts on the amenity of residential properties along Marlborough Road, subject to conditions and Section 106 obligations.

A separate point of pedestrian, cycle and emergency access would be provided from Spode Close. Spode Close is considered sufficiently wide to accommodate emergency vehicles.

With footways provided to both sides of the Marlborough Road access and the provision of a dedicated pedestrian and cycle access via Spode Close, the proposed allocation site would be linked to the existing pedestrian network. These links would ensure permeability on key desire lines to bus stops, the railway station, local amenities and services and Stone town centre, helping to enhance the use of the sustainable modes.

CBO has assessed the potential impact of development on the capacity of the wider highway network. This preliminary assessment suggests that at this stage of the promotion of the site there should be no fundamental traffic implications on the local highway network that would prevent residential development coming forward at the site.

Any future detailed layout will be designed in accordance with the appropriate design standards, with turning heads provided as required at the end of cul-de-sacs and private drives serving a maximum of 5 dwellings.

On this basis we conclude that highways and access is not considered a significant constraint to development.



Ecology and Arboriculture

An Ecological Appraisal and Tree Survey has been undertaken by FPCR. This confirms that the site predominantly comprises arable agricultural land of low ecological importance that is bound and separated by native species poor hedgerows of local importance, which contain a number of mature trees, and residential gardens along the northern and eastern boundaries.

FPCR concludes that the main ecological value of the site is limited to the native hedgerows and trees and a ditch feature along part of the northern boundary. Habitats on site have the potential to provide foraging resources for local bat and bird populations, as well as providing potential nesting opportunities for a range of urban and farmland bird species. The ditch habitat may have potential to support great crested newts, however previous survey work of several waterbodies in the wider area did not indicate the presence of great crested newts.

FPCR have confirmed that the site and adjoining land is not subject to any ecological designations. The site falls within the Cannock Chase SAC 15km buffer zone. On this basis, whilst development is unlikely to have any direct impact on these sites it is anticipated that contributions may be required towards mitigation of indirect impacts on the SAC.

FPCR has carried out an initial Biodiversity Impact Calculation. This indicates that a scheme of up to 119 dwellings has the potential to support significant net gains for biodiversity that exceed the 10% requirement set out in the Environment Act and meet the local policy target of a 20% net gain.

FPCR's tree survey confirms that the majority of trees are located along the site boundary and an internal field boundary. It is envisaged that aside from the removal of small sections of hedgerow to accommodate access into the site the development of the site would be able to avoid the removal of quality trees.

Key:

- Habitats Proposed**
- Built linear features
 - Developed land; sealed surface
 - Mixed scrub
 - Modified grassland
 - Other neutral grassland
 - Standing Water
 - Sustainable urban drainage feature
 - Un-vegetated garden
- Hedgerows Proposed**
- Native Hedgerow
 - Native Species Rich Hedgerow
- Urban Trees**
- Retained Large
 - Proposed/Retained Medium
 - Proposed Small

Figure 11: Proposed Habitat Plan



Figure 12: Tree Survey Plan

Key:

- Category U - Trees / Groups Unsuitable for Retention (BS 5837:2012)
- Category A - Trees / Groups of High Quality (BS 5837:2012)
- Category B - Trees / Groups of Moderate Quality (BS 5837:2012)
- Category C - Trees / Groups of Low Quality (BS 5837:2012)
- Hedgerow (Colour indicates BS5837:2012 Category)
- Root Protection Area (The RPA has been altered where appropriate to reflect underground constraints)
- Individual / Group Number and BS5837:2012 Category
- Indicative Shade Pattern (in accordance with BS5837:2012 where appropriate)

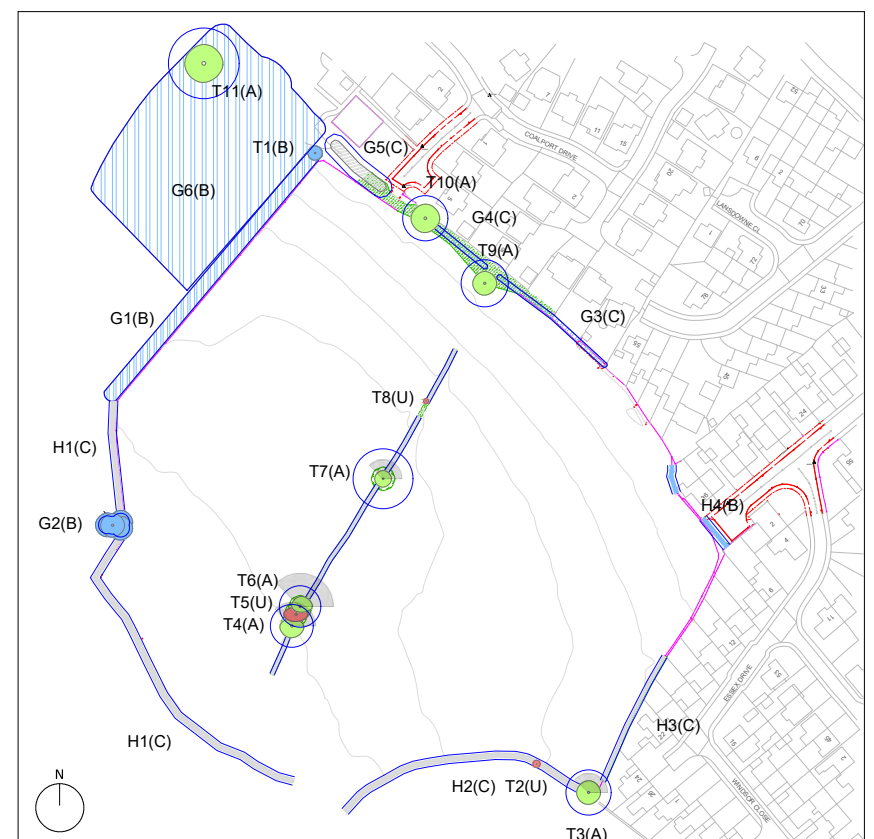


Figure 13: Flood Zone Map



Figure 14: Surface Water Flood Map



Flood Risk and Drainage

Avison Young has been appointed to undertake flood risk assessment and provide advice on drainage strategy for the site.

According to the Environment Agency's Flood Map for Planning, the site in its entirety is located within Flood Zone 1, the lowest level of risk from fluvial sources. The Environment Agency Long Term Flood Risk Map also indicates that the site is at very low risk of flooding from rivers, surface water and reservoirs. The site is, therefore, suitable for development in Flood Risk terms.

Surface water from any future development would be drained through SuDs features, which would be designed in accordance with national and local policies. It is likely that SuDs features would include roadside swales and attenuation basins. Surface water would ultimately be drained to existing surface water sewers in Marlborough Road and Spode Close.

Foul water would likely discharge via two separate foul water discharge points to the existing foul sewers in Marlborough Road and Spode Close.

In summary, the risk of flooding is considered low, and the site can be adequately drained for both surface water and foul water.

Landscape and Visual

Randall Thorp has been instructed to undertake a Landscape and Visual Appraisal for the site. The site is located on the edge of the urban area and is visually well contained to the north and east by existing residential properties. It is not subject to any national or local landscape designations, is broadly typical of the local landscape character and does not have any intrinsic value.

Randall Thorp has identified that the site would be visible from the south and the west, which is characterised by open countryside, however, public vantage points from these areas are limited. Any views towards the site are experienced in the context of Stone and the existing residential development. Further, the proposed HS2 route to the southwest of the site would detract from the open quality of the landscape.

Randall Thorp considers residential development to be typical of the area.



Existing vegetation to the north of the site

Existing property to the north west of the site

View from the western corner of the site looking north east

To reduce the potential landscape and visual impacts caused by development, development would be set back from the southern and western boundaries, incorporate a strong green infrastructure network including retained and proposed trees, hedges and shrubs to help the development transition into the open countryside and filter out views of the urban area.

It is overall considered that while the impact on landscape character and views is expected to be minimal, appropriate design mitigation will allow an attractive, high-quality development to be provided without undue harm to the landscape or visual amenity of the site and surrounding landscape context.

Landscape and visual impacts are not considered to represent a significant constraint to development on the site.



View from southern boundary of the site looking north east

Other Technical Considerations

Noise

BWB has been instructed to undertake a Noise Constraints Assessment for the site. As part of this, baseline noise monitoring was undertaken on site in May 2022 to capture existing noise conditions, including that generated by road vehicle movements on the M6 and surrounding road network.

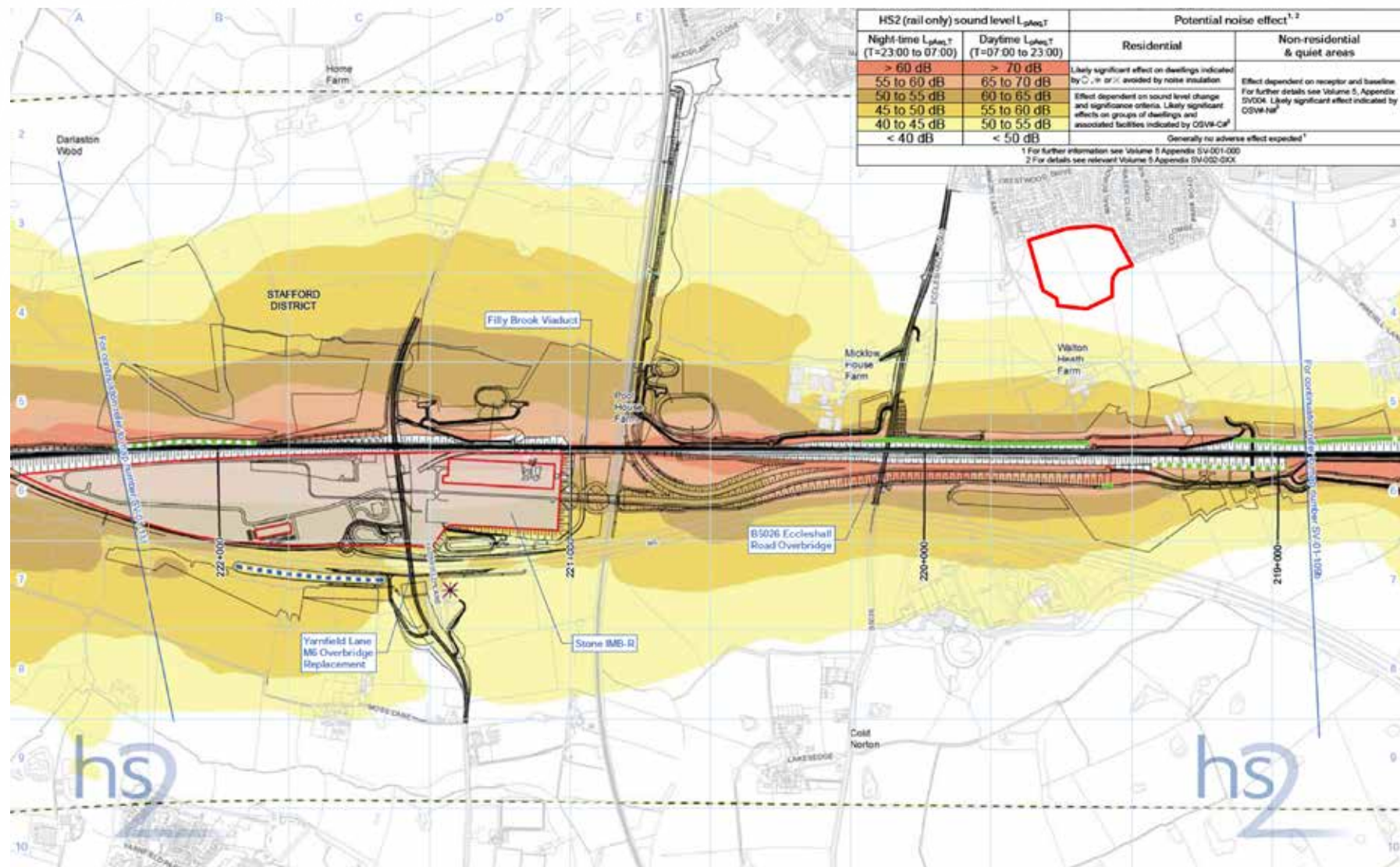
The results of the baseline noise monitoring indicated that noise levels should be of low to negligible risk, based on guidelines for new residential development.

BWB has also undertaken a desktop appraisal to consider the potential future noise effects of the proposed HS2 route. The available noise contour maps show that the predicted levels are well below the acceptable range in policy and guidance for residential development. Therefore, it is considered that there should be no significant constraints to development at the site in terms of noise.

Notwithstanding this, appropriate acoustic layout design has been incorporated into the Masterplan to prevent unreasonable acoustic conditions, especially through the location and orientation of dwellings set back from the southern boundary. Where necessary, additional mitigation can be provided in the form of uprated double glazing with alternative means of ventilation on façades facing the motorway.

On this basis noise is not considered to represent a significant constraint to development.

Figure 15: HS2 Noise Map



Air Quality

BWB has been instructed to carry out an initial Air Quality Constraints Assessment of the site. The site does not lie within, or in the vicinity, of an existing Air Quality Management Area and local air quality monitoring in the vicinity of the site recorded pollutant concentrations below the current air quality objectives.

It is considered that atmospheric pollutants associated with road, rail, dust and industrial sources are unlikely to significantly impact air quality within the site. A detailed air dispersion modelling assessment was undertaken to consider the influence of road traffic emissions within the site and pollution concentrations across the site were predicted to be well below the current air quality objectives. In addition, odorous emissions are unlikely to affect the residential amenity of the site.

Therefore, no mitigation is required to minimise the exposure of future residents to elevated pollutant concentrations and air quality is considered unlikely to be a constraint to development.

Archaeology

An Archaeological Desk Based Assessment has been undertaken by the University of Leicester Archaeological Services. The potential for medieval, post-medieval and modern archaeology is considered to be low to moderate, based on the Historic Environment Record, heritage context of the site, and previous land use. Archaeology is not, therefore, considered a constraint to development and further investigation could be carried out at the planning application stage, if required.



Utilities

All utility apparatus (sewage, water, electricity and telecoms) are present in the vicinity of the site and will be available to serve the proposed development.

Any costs required to upgrade the utilities network or provide suitable reinforcements will be met by the developer, or, by the network provider, where appropriate.

There are no existing utilities services within the site that would require diversion.

Agricultural Land

Kernon Countryside has undertaken an Agricultural Land assessment for the site. Whilst the majority of the site is classified as 'Best and Most Versatile land' (Grade 2), the site is not of a size that would be considered 'significant development' in the context of national policy and guidance. Furthermore, there are no areas of poorer agricultural land available to the south west of Stone. Therefore, agricultural land is not considered a constraint to development.



Is the site achievable?

If the site is allocated for residential development through the Local Plan Review, a planning application could be submitted for the residential development of the site very quickly, following engagement with the community. Taylor Wimpey would be able to start to deliver housing on site shortly after the grant of planning permission and immediately following site preparation works and the discharge of any relevant planning conditions.

Therefore, there is a realistic prospect of housing being delivered on the site within five years. As set out above, there are no significant site constraints that might prevent or make the development unviable. Therefore, the development of the entire site is viable and achievable.



5.0 Summary and Conclusions





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The land at Marlborough Road is clearly “deliverable” and should be allocated for housing through a review of the Stafford Borough Plan.

This Vision and Delivery Statement has clearly demonstrated that the site represents an excellent opportunity to deliver a sustainable residential development of approximately 119 dwellings on the edge of Stone, as part of a masterplan, along with significant new green infrastructure.

Available

The site is currently available. Taylor Wimpey has an agreement with the landowner to promote the land for residential development through the Local Plan Review. There are no legal or ownership impediments which would present the land from being delivered and the site is available immediately.

Suitable

The site is in a suitable location on the urban edge of Stone, and would act as a natural extension to the town. Stone has been identified as a Key Market Town and is second in the Sustainable Settlement Hierarchy, with a substantial range of services and facilities which are accessible to the site.

This document has demonstrated that there are no technical constraints or impediments to the scale and form of development identified in Taylor Wimpey’s emerging vision for the site. As such, the site is clearly suitable.

Achievable

The site is achievable, considering the technical assessments undertaken and the vision for the site, Taylor Wimpey confirm development on the site would be economically viable. It is anticipated that should the site benefit from an allocation in the emerging Local Plan, Taylor Wimpey would be in a position to submit an application and commence development quickly. As such, the development of the site is achievable.

Taylor Wimpey is committed to working with the Borough Council and the local community to design a high quality and sympathetic development which delivers real benefits for the village. We shall use this document to facilitate further consultation with the Council and the local community to refine the development vision and proposals.

Taylor
Wimpey

Marlborough
Road
Stone