

Stafford Borough
Local Plan 2020 - 2040:
Preferred Options
Responses

Agents, Developers and
Landowners - Part 10

Consultation Period: 24 October - 12 December 2022

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131	Wardell Armstrong on behalf of JT Leavesley Ltd	A, B	1
132	Wiseman, B.		30
133	WSP on behalf of Bellway Homes Ltd, Eccleshall	A, B	34
134	WSP on behalf of Bellway Homes Ltd, Hixon	A, B	147
135	Savills on behalf of Bellway Homes Ltd, Little Haywood	A - I	263
136	WSP on behalf of Seddon Homes	A, B	467
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140	YES Building Design Ltd		574

From: Day, Adam [REDACTED]
Sent: 12 December 2022 10:37
To: Strategic Planning Consultations
Cc: [REDACTED]
Subject: SBC Local Plan Consultation Submission - Little On Airfield
Attachments: SBC Local Plan Representation - Little Onn Airfield.pdf

Dear Sir/Madam,

Please find attached a representation submission prepared in response to the preferred options local plan consultation.

Can you please confirm receipt of this submission.

Kind regards

Adam

Adam Day | Principal Planner



Celebrating
185 Years

Contact Details

Full name (required): Adam Day

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):

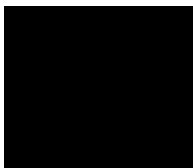
Tick the box that is relevant to you:

(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.

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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

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

No Comment

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 comment

Policy 3. Development in the open countryside - general principles

Yes – with modifications

Policy 3 Comments:

The premise of policy 3 is generally supported, particularly part 6 which pertains to support for renewable energy schemes in the countryside. We would recommend that the policy further sure up this support through additional wording that recognises that certain renewable energy projects may only be suitable in the countryside, i.e. larger scale solar developments and wind generation. This change would provide both policy support and general locational guiding principles for much needed renewable energy generation projects, helping address climate change and energy security in the short term.

Policy 4. Climate change development requirements

Yes – with modifications

Policy 4 Comments:

Policy 4 is of principal relevance to the carbon reduction and renewable energy generation strategy within Stafford Borough and as such, we support the general premise of the policy. We do however consider that in its current form, the policy does not provide optimum conditions for the promotion and support of new renewable energy developments. These facets are discussed in detail within the submission provided at the end of the form, notably at paragraphs 4 and 5.

Policy 5. Green Belt

Yes / No

Policy 5 Comments

No comment

Policy 6. Neighbourhood plans

Yes / No

Policy 6 Comments:

No comment

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 comment

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 comment

Policy 10. West of Stafford

Yes / No

Policy 10 Comments:

No comment

Policy 11. Stafford Station Gateway

Yes / No

Policy 11 Comments:

No comment

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 comment

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 comment

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

Yes / No

Policy 14 Comments:

No comment

Policy 15. Stone Countryside Enhancement Area

Yes / No

Policy 15 Comments:

No comment

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:

No comment

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 comment

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 comment

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 comment

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 comment

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 – Policy 40 with modifications

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:

We support the general approach taken by policy 40 with regard to renewable energy development. We do however consider that the policy should be developed further to offer a truly robust basis for renewable development, while ensuring compliance with national policy. This is discussed in full throughout the 'policy analysis' section of our submitted representation at the end of this form.

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 – with modifications

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:

We support the overall premise of seeking to identify, protect and mitigate potential environmental concerns through appropriate Development Plan policy. We would however urge that it be recognised within policy to a greater degree that different development typologies are compatible with certain constraints or multiple land uses.

Renewable energy generation is well established as being compatible with other beneficial uses such as agriculture and habitat creation. It is also clear that renewable energy projects are acceptable in more rural locations that may not be considered suitable for other development types. To proactively encourage renewable energy schemes in appropriate locations, we would suggest these factors be recognised within appropriate environmental policy.

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 Comment

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?

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:

When analysing the evidence base which applies to renewable energy allocations and policy, it is clear that the evidence underpinning these is deficient, in places out of date, and not a secure basis against which to inform the emerging Local Plan. We have discussed the shortfall in detail in our full submission between paragraphs 7 and 15.

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

Yes

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:

As previously noted, the evidence underpinning renewable energy generation policy, notably the site selection process is considered inadequate and not suitable to inform the eLP. The principal way of addressing this deficit is through the composition of additional evidence to provide a sound and up to date basis against which to develop the emerging Plan. We have discussed these aspects in detail in our full submission between paragraphs 7 and 15.

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.

Please find a full representation response to matters noted in this form attached at the end of the document.

The comments relate to the need for additional and updated evidence alongside associated policy development to inform the direction of renewable energy development in the emerging Local Plan, create a strong policy base against which to address climate change and energy security.

The site attached as part of the submission at Little Onn has also been submitted to the call for sites exercise.

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.

JT Leavesley Submission to Stafford Borough eLP Consultation

Introduction

1. This submission to the Stafford Borough Local Plan is made by JT Leavesley LTD in support of a potential mixed solar, battery storage, and wind renewable energy generation facility at Little Onn Former Airfield, ST20 0AS. JT Leavesley (JTL) seeks to proactively contribute to the preparation and direction of the emerging Local Plan, while identifying and suggesting how the site noted above can contribute to meeting future renewable energy requirements in manner compliant with emerging policy.
2. JTL fully support Stafford Borough in their aim to provide and allocate renewable energy generation opportunities throughout the Borough in the emerging Local Plan (eLP). This approach proactively responds to national objectives connected to the 2050 ambition for net zero carbon emissions, as well as the more ambitious local target to achieve the same aim by 2040.
3. We would suggest that a key route to meeting local and national 'net zero' targets is a proactive approach towards the provision of renewable energy generation through the emerging Local Plan. In order to ensure Local Plan proposals, policies and allocations are deliverable, they must be based on a robust, up to date evidence base, which informs carefully considered and positively worded policy. Failure to do so may result in the core principles of the plan being undeliverable either in parts or as a whole.

Policy Analysis

4. There are several core policies which support the development of renewable energy generation within the eLP. The policies identified are Policy 4: Climate change development requirements, and Policy 40: Renewable and low carbon energy. The guidance provided in Policy 4 at present is principally concerned with the how proposals should minimise their impact on climate change at a local level through largely site-specific focuses. Whilst we appreciate and support the general thrust of this policy, it is noted that the main focus appears to be on how individual residential and commercial developments will incorporate measures to reduce their impact on climate change. There is no overt mention of renewable energy in its own right within the policy, only how renewables can be incorporated to serve other development typologies.
5. We would urge that the policy broaden its focus to include guidance on the development of renewable generation schemes in their own right, rather than solely as part of other applications. Currently, there is very limited guidance in this respect within Policy 4 which we would suggest is an oversight given this is the principle emerging local plan policy for climate change adaptation methodology. It is widely accepted that renewable energy developments such as solar PV and battery storage, and wind generation are key in playing an active role in the decarbonisation of the energy sector by 2030 as required by the Energy Act 2013. As such, we would suggest this role be reinforced through robust and appropriate policies such as Policy 4.

6. We support and commend the Council in their approach to Policy 40 as this is significantly more focussed than Policy 4 in relation to the development of renewable energy generation, particularly potential solar and wind energy generation projects. We do however suggest that greater consideration be given to the potential allocations alluded within the policy. Part 'A' identifies that:

"The policies map identifies areas in which proposal for one or more wind turbines and proposals for solar photovoltaic generation will be supported in principle provided they are in accordance with the following paragraphs of this policy and other policies of this plan".

7. Following review of the evidence base used to inform the eLP, it is clear that these draft allocations have been informed by the Renewable Energy Topic Paper which depicts largely the same sites as potential locations for renewables in the eLP, however the renewable topic paper also notes at paragraph 3.1 on page 13:

"Please note the maps show the potential locations which were identified as the most suitable for the siting of strategic wind and solar installations, and do not constitute a proposed allocation".

8. Further examination of the methodology behind the identification of the sites within this paper reveals that their selection is largely based on a 2010 study undertaken by Camco. We would question as to how this now dated assessment has translated into the draft allocations within the emerging Local Plan for renewable energy generation, and whether the current site selection exercise undertaken can be considered sufficiently robust to underpin such a key element of the plan. Aside from the fact that the Camco study is considerably dated to be forming part of the evidence base for a development plan up to 2040, it is a county wide assessment and a very broad in scope. The Camco site selection appears to be based on broad GIS mapping considerations of certain development constraints, and what are considered to be favourable environmental conditions for renewable generation. The report does not appear however to make any overt recommendations for the preferred location for Solar PV development, rather focussing on potential wind and hydroelectric opportunities. We would therefore question how and why the potential sites for solar PV development which then appear in the Renewable Energy Topic Paper and are ultimately found in the eLP have been selected based on these assessments.
9. The 2010 Camco study does make broad recommendations as to potential locations for wind development, which is largely carried through into the more specific recommendations within the 2020 Renewable Energy Topic Paper. As per the potential sites identified for solar generation opportunities however, it remains unclear as to how the specific locations arrived at in the Renewable Energy Topic Paper and subsequently carried through into the plan, have been selected as preferred options for renewable energy development.
10. There is no apparent discussion within the eLP evidence base of alternative options having been considered through a comparison exercise being undertaken (for solar or wind generation) to assess the suitability of alternative sites, no assessment of deliverability, and no assessment of the potential connectivity to the wider National Grid. There is also a deficit of any detailed and up to date environmental assessments to inform the draft renewable generation allocations, and when combined with the other shortcomings, there is the

significant risk that the current allocations may be undeliverable and in doing so, undermine the overall development of renewable energy projects through the eLP.

11. There are facets of policy 40 which we do support however and would encourage the Council to develop further in seeking to create a robust basis for development. Paragraph 'b' of policy 40 is a more secure framework against which to assess potential solar developments within the Borough over the emerging plan period. Part 'b' identifies that support will be given for renewable energy generation projects where it can be demonstrated through technical and policy assessment that there will be no unacceptable impacts. We would suggest that this approach will yield more deliverable renewable energy generation projects within the Borough, helping to meet overall 'net zero' objectives locally and nationally.
12. We also note and support the appropriate application of paragraph 'd' of Policy 40 which accords with national policy in the preference for windfarms to be developed in areas identified as suitable within an adopted Development Plan. We do however reiterate the importance in this regard of the allocations within the plan being suitable, available, and deliverable.
13. The draft renewable energy allocations within the eLP need to be underpinned by a thorough and robust site selection exercise, including a Call for Sites exercise at the outset and a subsequent Sustainability Assessment. Currently, it does not appear that the draft allocations have not been arrived at through either a Call for Sites or appraisal via an SA. As such we would question the soundness of these allocations to inform the eLP and ultimately the decision-making process. We would suggest that given the questionable basis on which the draft allocations have been identified, there is the risk of development being directed to inappropriate and undeliverable locations. This has the potential to conflict with paragraph 155(b) of the National Planning Policy Framework (NPPF) which identifies '*local plans should consider identifying suitable areas for renewable and low carbon energy sources*'. We would therefore suggest that Stafford Borough re-evaluate the site allocations evidence base pertaining to renewable energy and consider the allocation of demonstrably suitable and deliverable alternative development opportunities.
14. The NPPF provides strong support for renewable energy development, notably Section 14 and specifically paragraph 158 which states:

"When determining planning applications for renewable and low carbon development, local planning authorities should:

 - a) *not require applicants to demonstrate the overall need for renewable or low carbon energy, and recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions.*
 - b) *approve the application if its impacts are (or can be made) acceptable."*
15. With reference to Solar PV and battery storage proposals, it is clear from paragraph 158 that the most effective method of bringing development forward is through applications to demonstrate their suitability and policy compatibility as alluded to in Part 'b' of Policy 40. This

will enable both allocated and unallocated sites to come forward through the plan in suitable and appropriate locations.

16. We would also suggest that the benefits of solar in terms of minimal land impacts be recognised within policy. Solar PV and Battery storage require a minimal physical ground footprint, while the temporary nature of these developments means that the site can be returned to previous uses after it has operationally ceased. There is the additional benefit that solar developments are compatible with other land uses including livestock grazing and habitat creation for biodiversity gain. These characteristics mean solar PV and battery developments are inherently flexible and multifaceted in the benefits that can be delivered. We would urge that this be directly recognised within eLP policy to ensure it is taken into account during decision making.
17. It is noted and accepted that the guidance applied to wind energy generation is more stringent than solar, largely due to the inherently greater impact wind generation may have on its surrounding environs. Footnote 54 of the NPPF requires that:

“a proposed wind energy development involving one or more turbines should not be considered acceptable unless it is in an area identified as suitable for wind energy development in the development plan; and, following consultation, it can be demonstrated that the planning impacts identified by the affected local community have been fully addressed and the proposal has their backing”.
18. This requirement is subsequently rightly reflected within eLP policy 40(d), however given the requirement for wind development to be allocated through adopted Development Plans, it is even more pertinent for the allocations to be based on sound evidence and demonstrably deliverable. At present, the sites identified for wind generation within the eLP appear to have been allocated more on the grounds of being a beneficial location from a high level and preliminary technical assessment perspective, rather than any detailed, site specific assessment of planning constraints or promotion from vested interests. We would therefore suggest that Stafford Borough consider allocating alternative or additional sites for wind generation which are both demonstrably suitable from an environmental perspective and benefit from ownership willing to see the land developed.

Little Onn Airfield Proposals

19. As part of this submission, JTL seeks to raise awareness of Little Onn Former Airfield, ST20 OAS as a suitable, available and deliverable location for potential solar PV, battery storage and wind energy generation. The nature of the site also lends itself to potential biodiversity enhancements, with significant net gain opportunities available through development. Little Onn is a rural, principally agricultural settlement within Stafford Borough.
20. The site falls under the sole ownership of JTL and is comprised of 3 closely related parcels of land, a plan for which is provided at appendix 1 of this submission. The western parcel is circa 5.3ha in size and principally comprises a single agricultural field with 2 agricultural sheds. The immediate boundary of the field is formed by hedgerow/boundary vegetation with interspersed tree growth predominantly within the northern boundary. The wider surrounds largely comprise field parcels, with a small number of dwellings to the south, west and north, the nearest being circa 28m from the field boundary to the south. There are several small wooded areas within the vicinity of the field, although not directly adjacent and a pond

located within the abutting western field. Access to the site is achieved by Little Onn Road to the east which has also historically facilitated an access to Little Onn Airfield.

21. The central main parcel comprises disused airfield and measures circa 85ha. The site is no longer in use as an airfield, predominantly now comprising agricultural use with associated operational structures, pits and equipment present on the site. Within the site ownership there are also several residential dwellings which are currently occupied by tenants, however there is no intention to displace or remove these dwellings as part of any potential development. These dwellings are also well separated from the main airfield area being located to the western extents of the site in their own land parcels. Given the size of the site, it is considered that proposals for renewable energy generation could be satisfactorily accommodated without affecting the amenity of any nearby residents. The wider boundary of the airfield is formed by hedgerow to the west and south west with Little Onn Road beyond, Slab Lane to the north and east, and a simple fence arrangement to the south. The largest parcel experiences the same rural, agricultural setting as the western parcel, but is located closer to the Shropshire Union Canal and woodland located to the east. There are also further residential dwellings located to the south and west, comprising a single large dwelling to the immediate south and the settlement of Marston to the south west. Aside from the residential units within the ownership, the nearest dwellings are circa 33m from the western and southern boundaries, but are well screened by dense vegetation.
22. The third and final parcel comprising the site ownership is formed by 2 fields located to the east of the central airfield parcel. The eastern area measures circa 7.5ha and contains no built elements, comprising solely of agricultural land and woodland. The north and eastern boundary to the parcel is formed by woodland and the Shropshire Union Canal which is set into a cutting below the level of the site. The woodland runs the length of the site and provides a dense visual screen between the canal and the parcels to the west. There is a single residential dwelling to the south (Circa 77m), however the parcel is no closer to any nearby dwellings overall than other areas of the site. The western boundary is formed by Slab Lane, which also provides principal access to the eastern parcel as well as the central airfield parcel. Any development on the eastern parcel would be undertaken with full regard to the adjacent woodland and canal, minimising any possible impacts and resulting on no loss or degradation to each asset.
23. A preliminary assessment of potential constraints to development indicates that there are no statutory or non-statutory designations within the land ownership. The principal items of note within the vicinity of the site are heritage considerations, notably along the canal to the east which has 5 Grade II listed assets associated with the canal beyond the densely treed site boundary. These assets comprise bridges and milestones, however given the dense vegetation along the eastern boundary of the land ownership, it is not considered likely that renewable proposals in this location would detrimentally effect any of these assets. The significant size of the ownership also affords the option for development to be concentrated away from any sensitive assets or receptors, which would be guided by the compilation of appropriate technical assessments. Aside from the canal, there is a Grade II house to the south of the main airfield parcel, two further Grade II dwellings in Marston to the south west, and a scheduled monument to the north west. This monument is identified as a moated site associated with Little Onn Hall, located circa 130m from the nearest ownership boundary. The monument benefits from significant intervening vegetation preserving its immediate setting, while again

the size of the overall ownership of the potential renewables site means appropriate mitigation can be achieved through design as required.

24. The site does not contain nor is it adjacent to any habitat or landscape designations. The nearest item of note is Motte Meadows (SSSI, NNR, SAC) located circa 780m from the southern boundary of the airfield parcel. The site falls within the impact zone for this designation which is identified as Lowland Grassland. Given the nature of the proposals, it is considered unlikely that there will be any detrimental impact on this designation.
25. There are also no overt policy constraints which would preclude the proposals in this location. Rather, as discussed there is national and local policy support to be derived for appropriately located solar generation (allocated or not), while we also note that the airfield is within the locality of other potential designations for wind energy generation. Given these current draft allocations have been largely derived from a high-level technical assessment as to the physical suitability of the area for wind generation, it is reasonable to consider that Little Onn Airfield benefits from the same technical suitability. The site however has gone a step further than the draft allocations, in that a preliminary policy and environmental review has been undertaken which suggests there are no overt constraints which would preclude the development of such as scheme in this location. Further, the site benefits from a willing land ownership seeking to actively promote the land for renewable energy generation use.

Site Accessibility

26. The access to the site is from the A5 in the south via Ivetsey Road, leading to Broad Holes Lane, Fenton House Lane, Marston Road and finally Slab Lane.
27. Ivetsey Road is a 2.5km long rural road which varies in width from 5.2m wide to 6.0m wide. It has clear visibility, and for half of its length has a double solid white line down the centre. Each carriageway is wide enough to carry two-way large vehicles to the village of Wheaton Aston with ease.
28. As Ivetsey Road enters Wheaton Aston it terminates at the junction with Broadholes Lane and High Street. To access the site, construction vehicles would use Broadholes Lane and Fenton House Lane on the western side of the village. The route prevents the commercial vehicles having to enter the residential area of Wheaton Aston.
29. Leaving Wheaton Aston, the commercial vehicles will use Marston Road, which is a derestricted, 1.9km rural road connecting Marston with Wheaton Aston. The road varies in width from 3.8m to 4.3m and has numerous passing places. The road passes on the eastern side of Marston and continues a further kilometre until it reaches the southwestern access to the air field, this is Access Option A.
30. To reach Access Option B (off Slab Lane) The vehicles must travel a further 1.15km north to reach the junction with Slab lane, the second access point is 300m down Slab Lane.
31. The solar site's development for renewable energy activity will only need larger vehicles initially to deliver and construct the any operation units. Any potential wind generation will be achieved by smaller scale turbines, circa 10m in height which are modular in construction and can be transported without the need for extra-length vehicles.

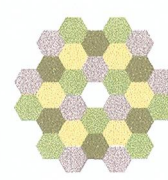
32. Beyond the initial construction phase the site will only require smaller vehicles to visit the site to perform a regular maintenance regime. If any unit were to fail, then a larger suitable commercial vehicle would be required to deliver any new unit. It will be rare for the units to fail and need replacement, so the requirement for larger vehicles post construction would be considered to be highly infrequent.
33. Establishment and operation of the site for renewables is not constrained by construction traffic management matters.

Submission Conclusions

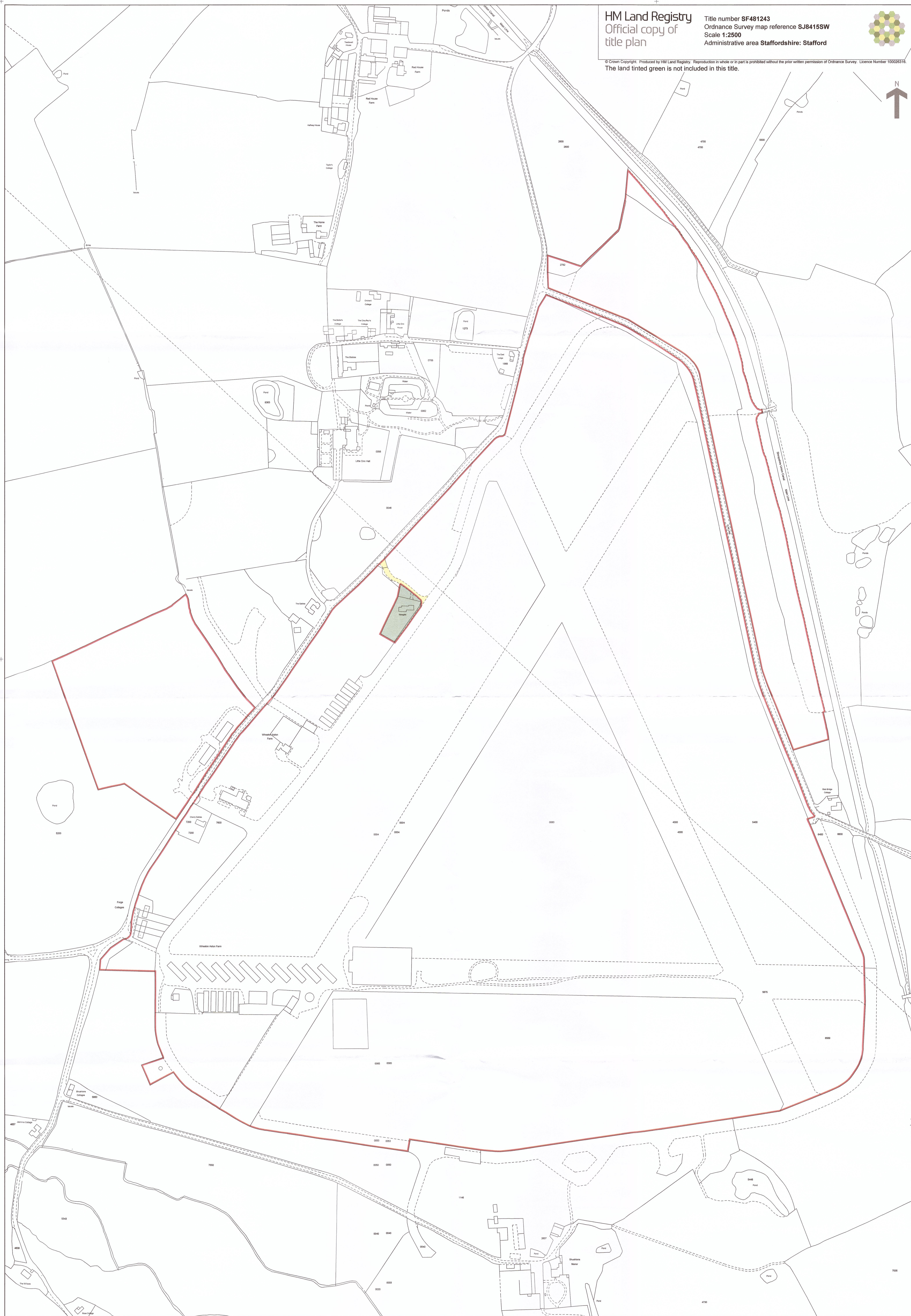
34. In summary, JTL wish to support the emerging Stafford Borough Local Plan and commend the Council in taking affirmative action with regard to the allocation and future development renewable energy sites. This approach will be key in meeting local and national commitments to facilitate 'net zero' and addressing wider climate change as a whole. The commentary provided within this submission seeks to ensure that the emerging Local Plan is both sound and robust as a development strategy, and able to deliver much needed renewable energy proposals in a positive way.
35. Having undertaken an assessment of the draft solar and wind allocations put forward within the eLP, it is apparent that there is a shortfall in evidence to justify the selection of the sites currently chosen, and whether these sites can be delivered. There is no detailed site-specific technical assessment, no call for sites exercise, assessment within the draft SA, nor overt landowner support for any of the renewable energy generation allocations within the Plan.
36. JTL would therefore suggest that the eLP consider the inclusion of alternative, demonstrably deliverable sites for renewable energy generation which have undergone more detailed assessment, such as those proposed within this submission and detailed at appendix 1. Allocation and development of sites such as Little Onn Airfield will be key to meeting national net zero targets by 2050 and the more ambitious eLP net zero target for Stafford Borough by 2040. We would further urge that local plan policy pertaining to renewable energy continue to reflect its key role, reinforcing support for this manner of development in demonstrably suitable locations throughout the Borough.

HM Land Registry
Official copy of
title plan

Title number SF481243
Ordnance Survey map reference SJ8415SW
Scale 1:2500
Administrative area Staffordshire: Stafford



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The land tinted green is not included in this title.



This official copy issued on 9 September 2019 shows the state of this title plan on 9 September 2019 at 10:48:57.
It is admissible in evidence to the same extent as the original (s.67 Land Registration Act 2002).
This title plan shows the general position, not the exact line, of the boundaries. It may be subject to distortions in scale. Measurements scaled from this plan may not match measurements between the same points on the ground.
This title is dealt with by HM Land Registry, Durham Office.

From: Preferred Options Consultation [REDACTED]
Sent: 08 December 2022 13:01
To: Strategic Planning Consultations
Subject: Preferred Options Consultation - Submitted Response

Full name: **Brian Wiseman**

Email: [REDACTED]

Statutory Bodies and Stakeholders

Organisation or Company: **No reply**

Age: [REDACTED]

Added to database: [REDACTED]

Topics (Contents page): **Site Allocation Policies**

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): **Not asked**

Comments: **Not asked**

Policy 2 (Settlement Hierarchy): **Not asked**

Comments: **Not asked**

Policy 3 (Development in open countryside): **Not asked**

Comments: **Not asked**

Policy 4 (Climate change and development requirements): **Not asked**

Comments: **Not asked**

Policy 5 (Green Belt): **Not asked**

Comments: **Not asked**

Policy 6 (Neighbourhood plans): **Not asked**

Comments: **Not asked**

Meecebrook Garden Community

Q3 - Do you agree with proposed new garden community: **Not asked**

Comments: **Not asked**

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): **Yes**

Comments: **Call for sites Stafford Borough Local Plan/SHELAA 2022 GNO 06 We are asking the council to consider adding the land sited at Brookhouse road, Gnosall (North) ST20 0EX to the Forward Plan and call for land. Adding these 0.06 hectares of land to the forward plan could supply a future small residential development that would be acceptable and sympathetic to the village area with regard to the council's future housing plans. The land is served from an access point already in existence without detriment to either the amenities of adjoining properties or the visual quality of the area. The site relates satisfactory to the existing pattern of development having regard for the present Government Policy on Countryside Development and latest policies SHELAA. In 1994 there was a planning Rejection for this site based on Prematurity due to the possibility of predisposing future formation of the local plan. However; the latest Local Plan and SHELAA overrides all previous plans. This is now extinguished due to the updated LP. The previous 1994 situation no longer exists. This site now fits well into the Government and Councils appeal for additional new housing development land This site which now complies with all Policy requirements including Policy 41 Historic Environment should be acknowledged and added into the latest forward plan. It also meets objectives of local needs. There are no access, walkway, Ecology or Environmental issues and a full report would be presented prior to any development.. The land is sloped and due to the gradient it would be unsuitable for use as recreational, sporting purposes, The site faces "The Acres" open space, walkways and playing fields to one side which already provide ample leisure and recreation facilities for the area. It is not agriculture land and has never been used by the public as open space, so does not create any loss of amenity or access issues. There is now a call for local Green sites in the Stafford Borough Local Plan and states that new houses in the area will be acceptable. The site meets a critical shortage of housing nationally, especially affordable housing and hopefully will be judged on its merits. There is a 1980s housing estate that adjoins one side of the site with school**

playing fields to the rear. A 1/3rd of the land would remain undeveloped and untouched to provide a green buffer to the adjoining Gnosall conservation area. Local infrastructure and road layouts including access road to the site already exist. There would be little disruption to the centre of the village during construction. All amenities for the local needs are already provided for; i.e. Shops, Doctors Surgery, post office, pubs, Bus Service, transport links, Playing fields, Open Space, Playground, Primary School and Dentist. Building houses within the boundaries of the village add vitality and bring much needed income to support local shops and businesses. In conclusion it would appear the site lends itself well to residential development. If the proposed dwellings were designed to suit the surrounding properties; then the site would fit well within the existing estate and help meet the needs of current and future generations as well as meeting the criterion the Government and Borough Council require.

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:

No reply

From: Nicholson, Sean [REDACTED]
Sent: 12 December 2022 11:34
To: Strategic Planning Consultations
Subject: Preferred Options consultation response by WSP E&IS on behalf of Bellway Homes Ltd - Land to the South of Stone Rd Eccleshall
Attachments: WSP E&IS UK for Bellway land at Eccleshall final.pdf

Dear team,
Please see response attached.

This includes a written response to the consultation, forms and the Vision Document that was previously submitted.

Please do not hesitate to contact me if you require any further information.

Kind regards,



Sean Nicholson
Principal Consultant
MRTPI

[REDACTED]

[REDACTED]

wsp.com

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Stafford Local Plan

Draft Response on behalf of Bellway Homes Ltd: Land to the South Stone Road, Eccleshall

1. Introduction and Summary

Stafford Borough Council (SBC) is in the process of updating its Local Plan. It is now consulting on Preferred Options. Bellway Homes (Bellway) is responding on a number of aspects and this response relates to the development strategy set out in the Preferred Options Local Plan and associated policies. Site specific comments are then provided in relation to Land to the South Stone Road, Eccleshall.

The key issues identified in the Preferred Options document are as follows:

- The Local Plan should plan for more growth than the proposed 435 dwellings per annum, reflecting historical rates of development in the Borough but could also make a greater contribution to the unmet needs associated with neighbouring authorities;
- The Local Plan should commit to meeting unmet housing needs arising from other authorities. At the moment the provision for such needs is contingent on the delivery of housing at Meecebrook Garden Village;
- The assumed delivery rate for Meecebrook Garden Village is not justified and could lead to a significant shortfall in the supply of housing, including affordable housing during the plan period. Meecebrook contributes 24% of housing supply in the plan period;
- The inclusion of Meecebrook Garden Village in the Local Plan could cause significant delays to the progression of the Local Plan. Significant issues in relation to the duty to co-operate associated with infrastructure delivery will need to be resolved before the Local Plan is submitted. A review commissioned by Bellway and other interested parties highlights the amount of work there is to do to resolve issues associated with the delivery of the railway station at Meecebrook. Bellway therefore objects to the inclusion of Meecebrook in the Local Plan on the grounds that it is not well located and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes);
- The build out rates for other sites and the assumption on windfall rates are not justified;
- The proposed spatial strategy does not make sufficient provision for growth in the Larger Settlements, including Eccleshall. The lack of provision in the Larger Settlements is also not consistent with Paragraphs 20, 60 and 69 of the NPPF which include the need for Local Plans to ensure that a sufficient amount and variety of land can come forward where it is needed;
- The spatial strategy should allow for allocation of land for housing at other sustainable settlements. A housing needs assessment is needed for the Large Settlements to

inform an evidence-based distribution of development, to ensure that market and affordable housing needs can be met, the viability of local services and facilities supported and new infrastructure investment secured (via CIL/S106). This evidence would sit alongside the Settlement Assessment and SHELAA to help ensure a robust and justified approach to securing a sustainable spatial strategy (i.e. directing growth to where it is needed, where it is sustainable and where there are deliverable sites);

- Eccleshall is acknowledged in the Local Plan's evidence base as a main settlement. It represents a sustainable location for growth. The Council's own assessment confirms that the site is suitable in terms of transport, heritage, landscape and infrastructure considerations. The Council should plan positively to address identified capacity issues in relation to secondary education provision; and
- The Site is available, the promoter, Bellway is a housebuilder committed to bringing the site forward in the short term. This will assist the Council through delivery of market and affordable homes in a highly sustainable settlement. The site should therefore be allocated in the Local Plan.

2. Development Strategy

Policy 1 of the emerging Local Plan sets out the amount of housing and employment to be provided in the plan 2020-2040 and the spatial distribution of new development.

Key elements of the policy are:

- Provision for 10,700 new homes (535 per annum);
- Provision for at least 80 hectares of new employment land;
- The housing requirement is proposed to be met through:
 - Completion of the North of Stafford and West of Stafford strategic development locations;
 - Completion of other existing commitments;
 - Proposed allocation at Stafford Station Gateway;
 - 3,000 homes at Meecebrook Garden Village by 2040 (with 3,000 homes delivered beyond 2040);
 - Other proposed allocations and windfalls.

2.1 Planning for new homes and jobs

The evidence base for the Local Plan notes that, due to its ageing population structure, natural change in Stafford Borough in the period 2020 to 2040 is projected to be negative in all Stafford Borough Economic and Housing Development Needs Assessment (EHDNA)¹ scenarios. Deaths will exceed births. This means that the principal driver of the need for new housing will be net immigration to the borough.

Policy 1 states that provision will be made for 10,700 dwellings (535 dwellings each year) between 2020-2040. Paragraph 1.2 of the supporting text states that the local housing need for the Borough

¹ <https://docslib.org/doc/3927264/stafford-borough-council-economic-and-housing-development-needs-assessment>

is 435 dwellings which is above the minimum standard method figure of 391 dwellings for Stafford. Stafford Borough Council ('SBC') is also proposing a 2,000 dwelling contribution (100 dwellings per annum) towards meeting the needs of adjacent Housing Market Areas ('HMA').

The EHDNA notes that the reasons why the Council may consider identifying a higher housing requirement figure in its emerging Local Plan include the need to accommodate a sufficient economically-active workforce to meet needs arising from projected economic growth, in particular taking into account the future strategic economic growth planned for the Borough through a potential Garden Community and Stafford Station Gateway. These developments are anticipated to generate around 12,470 jobs. The EHDNA notes that **647 dpa** is the number of homes needed to balance housing and jobs growth, allowing for employment growth proposed within the Local Plan but this takes no account of unmet housing needs arising from adjacent Housing Market Areas.

The Planning Practice Guidance ('PPG') states that there may be occasions where *"previous levels of housing delivery in an area...are significantly greater than the outcome from the standard method"* and *"authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests"* (Reference ID: 2a-010-20201216). Recent housing delivery in Stafford has been significantly more than the standard method figure of 391 dwellings and the proposed increase to 435 dwellings per annum. Table 13 of the 'Lead-in Times and Build Rate Assumptions' Topic Paper² sets out that in 2020/21 614 dwellings were delivered and in 2021/22 506 dwellings were delivered. Bellway therefore consider that past delivery should be a key consideration in determining the housing requirement for the Borough and planning for more growth than the proposed 435 dwellings per annum.

Paragraph 11 of the National Planning Policy Framework (NPPF) states that: *"all plans should promote a sustainable pattern of development that seeks to meet the development needs of their area."*

The Local Plan is not consistent with Paragraph 11 of the NPPF because it fails to plan for a balance between homes and the jobs associated with planned employment growth. This could give rise to increased car based commuting into the borough. The evidence base for the Local Plan³ notes that Stafford borough produces 1.1 million tonnes of CO₂ through greenhouse gases (GHG) per year. This is higher than the average for the county of Staffordshire and for the UK as a whole on a per capita basis. It notes that the largest source of these emissions is, petrol and diesel, mainly for road transport use. Failing to provide a balance between homes and planned job growth is not likely to improve on the current position in relation to transport related GHG emissions and could worsen it.

In addition to the borough's own housing need, the development strategy allows for **2,000 homes as a contribution to meeting unmet need of other authorities in the region**. Those homes are the subject of ongoing negotiations with other regional authorities.⁴ The Sustainability Appraisal states at 5.2.25:

*"there is considered to be a need to focus attention on growth scenarios that would involve setting the housing requirement at **435 dpa** or a higher figure. A higher figure would likely be in response to unmet needs, as opposed to locally arising needs, and an obvious unmet needs figure for discussion is **2,000 homes, or 100 dpa over the 20 year plan period**, such that the local plan housing requirement would be set at **535 dpa**."*

² <https://www.staffordbc.gov.uk/lead-in-and-build-rate-assumptions-topic-paper>

³ <https://www.staffordbc.gov.uk/climate-change-topic-paper>

⁴ A joint response was received from the Black Country authorities at Issues and Options stage. This response highlighted the functional migration and commuting relationship between Stafford Borough and the Black Country and requested that Stafford Borough Council take between 1,500 and 2,000 homes as a contribution to meeting unmet need in the Black Country.

Bellway support SBC's confirmation that a contribution will be made towards the Greater Birmingham and Black Country HMA ('GBBCHMA') and North Staffordshire HMA given the strong migration relationships identified in the evidence base (paragraph 1.30 of the Housing and Employment Land Requirement Topic Paper October 2022). However, Bellway objects to the 2,000 dwelling figure proposed. The NPPF (paragraph 31) and PPG requires policies to be justified and the evidence base "*needs to inform what is in the plan and shape its development*" (PPG Reference ID: 61-038-20190315). There is no information in relation to the consideration of needs arising from Greater Birmingham and North Staffordshire.

There is an identified shortfall of circa 28,000 dwellings across the Black Country up to 2039. Paragraph 1.32 of the HELN Topic Paper sets out that the Black Country authorities have requested for Stafford to take between 1,500-2,000 dwellings to assist in meeting their shortfall. However, SBC has not confirmed which HMA / authority need the proposed 2,000 dwelling contribution is seeking to address and it is unclear whether SBC has been part of any Duty to Cooperate discussions with other authorities to identify what contribution they require from the Borough. From the evidence provided, it seems that SBC's proposed contribution will only cover the Black Country's request and provide nothing towards the significant housing shortfall identified in Greater Birmingham of circa 78,000 dwellings up to 2042 (combined GBBCHMA shortfall of circa 106,000 dwellings). North Staffordshire HMA has not confirmed at this stage whether there are any identified needs arising from the area so if there are than this will only add to the significant shortfall from the GBBCHMA.

The Housing and Employment Land Numbers Topic Paper⁵ prepared by the Council also notes that: "*The council is at present undecided on whether or not the Scenario D jobs-based uplift to local housing need can make an additional contribution to meeting unmet need. This will be considered further after the preferred options consultation.*"

The EHDNA also notes that in the period between 2008 and 2014 there was a significant decline in the rate of new household formation among the 15-34 age group. The EHDNA says that this was probably attributable to a range of factors including increased house prices, reduced earnings growth, stricter lending practices, and larger household sizes among new international migrants. A 'partial catch up' adjustment was proposed. The EHDNA concludes that the partial catch up will not be applied because there is no guarantee that building more homes would result in household formation in younger age groups. However this provides further justification for a housing target that reflects the local context.

2.2 Meecebrook's contribution to housing in the plan period

Policy 1 states that 3,000 dwellings will be delivered at the proposed new settlement of Meecebrook by 2040. This amounts to 24% of growth proposed across the plan period. The NPPF (paragraph 31) requires policies to be underpinned by relevant evidence, which is adequate, proportionate and justifies the policies proposed. Bellway object to this proposed allocation and have significant concerns with the proposed delivery of this site given the limited amount of evidence provided to demonstrate its delivery.

The NPPF (paragraph 73) requires new settlements to be "*well located*" and "***supported by the necessary infrastructure and facilities (including a genuine choice of transport modes)***". Paragraph 73 of the NPPF goes on to state that Councils should "*identify suitable locations for such development where this can help to meet identified needs in a sustainable way*" through considering "*opportunities presented by **existing or planned investment in infrastructure***" [WSPs emphasis]. Bellway do not consider that the location of the Meecebrook allocation is 'well-located' given its distance from any key existing infrastructure. However, Bellway understand that the

⁵ <https://www.staffordbc.gov.uk/housing-and-employment-land-requirement-topic-paper>

Meecebrook site has been selected by SBC because of the planned investment in a new station to serve the site. Bellway has significant concerns with the rail station proposal and its deliverability.

Paragraph 1.4 of the Local Plan notes: *“It is intended that any unmet housing need from other authorities will be delivered at Meecebrook Garden Community. This, in turn, is predicated upon Meecebrook being able to deliver 3,000 homes within the plan period. If further evidence indicates that Meecebrook would deliver fewer than 3,000 homes within the plan period, then the quantum of unmet needs the borough is able to accommodate would likewise need to be reassessed.”*

The prospect of the quantum of housing being reassessed at some point in the event that Meecebrook Garden Community does not deliver 3,000 homes could mean that there is a bigger imbalance between homes and job growth in the Borough but also that needs arising within the Borough are not fully met. Moreover it is noted that Meecebrook does not contribute to housing need until 2030, suggesting that the contribution towards un-met needs from other authorities would be met by other sites before then. There is a very significant housing shortfall within the GBBCHMA (circa 106,000 dwellings) which needs to be addressed immediately rather than in the latter part of the plan period (or in this plan period at all). Allocating deliverable sites across the Borough’s existing sustainable settlements, such as Eccleshall (Tier 4 settlement), will ensure that the needs of the HMA are met in the short and medium term rather than being pushed to a site that is currently not sustainable (no confirmation on when the rail facilities will be delivered, if at all given the weak business case and lack of engagement and support from Network Rail) and is unlikely to deliver any dwellings within the next 10 – 15 years.

The Council has produced a paper on lead in and build rate assumptions, based on analysis of housing completions from 1 April 2011 to 31 March 2022.⁶ The paper also references the Lichfield Report (From Start to Finish).⁷

The Council has assumed that development at Meecebrook would commence in 2030. It is important to note that any issues associated with the duty to co-operate will need to be resolved prior to the Local Plan being submitted for examination. As the duty to cooperate relates to the preparation of the plan it cannot be rectified post-submission, so if the Inspector finds that the duty has not been complied with, they will recommend that the local plan is not adopted and the examination will not proceed any further (Planning Practice Guidance Paragraph: 031 Reference ID: 61-031-20190315). There is a danger that issues associated with the delivery of Meecebrook, which relate to the duty to cooperate, impact on progression of the Local Plan, particularly issues associated with:

- provision of the new railway station,
- funding,
- viability (including the impact this could have on the provision of affordable homes);
- delivery,
- land ownership
- necessary strategic highway infrastructure upgrades and
- agreement around meeting unmet housing need arising from outside of the Borough (which paragraph 1.4 of the Local Plan suggests is dependent on delivery of Meecebrook).

The annual build out rate assumed by the Council for sites over 2,000+ homes set out in the paper at Table 12 is 160 dpa (which is consistent with the Lichfield Report). However the paper notes (at

⁶ <https://www.staffordbc.gov.uk/lead-in-and-build-rate-assumptions-topic-paper>

⁷ <https://lichfields.uk/content/insights/start-to-finish#downloadcollapse>

paragraph 5.27) that any sites for more than 2,000 dwellings are assumed that they will have their own projected housing trajectory so will not necessarily follow this assumption. Paragraph 6.4 of the note includes an assumption that development at Meecebrook begins in 2030 and that it delivers 300 homes per annum. There is no explanation in the paper as to how the rate of 300 dpa has been arrived at. Table 12 in the LTBRA Topic Paper sets out SBCs proposed annual build rate assumptions and states that on sites of 2,000+ dwellings the proposed trajectory is 160 dwellings per annum. This aligns with Table 10 of the Council's Lead in and Build out Rates Topic Paper, which sets out the findings of the Lichfields Report. It is therefore unclear why SBC is proposing for Meecebrook to deliver almost double the figures identified in Tables 10 and 12 when SBC's own evidence is stating that a realistic assumption is 160 dwellings per annum. The proposed delivery rate is therefore considered to be unrealistic, over stated and therefore contrary to NPPF paragraph 73d, which requires strategic policy making authorities to make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites.

In terms of the 2030/31 delivery commencement date, Bellway also do not consider that this is realistic. Table 5 of the LTBRA Topic Paper shows Lichfields' timeframe assumptions from validation to completion of the first dwellings on a site. For 2,000+ dwellings, the average is 8.4 years. Table 7 shows SBC's assumptions on timescales and this only shows sites of 500+ which SBC consider will only take 4.5 years from validation and completion of the first dwellings. This is wholly unrealistic and given SBC's limited experience in delivering sites of 3,000 dwellings. SBC should be relying on the evidence of other authorities and Lichfields. In the best case scenario (i.e. application is validated upon the adoption of the Local Plan in October 2024), SBC should not be projecting the completion of any dwellings at Meecebrook until 2033/34 (8.4 years from October 2024) at the very earliest. However, given not all of the landowners are currently part of the promotion and the scale and cost of required infrastructure is unknown, we do not consider that it is likely an application would be ready for submission by October 2024.

In light of the above, in the best case scenario, SBC will need to identify sites to accommodate a minimum of 600 dwellings which will not be delivered in 2030/31 and 2031/32 as currently shown in Table 13 of the LTBRA Topic Paper. This shortfall will only increase when SBC provide a more realistic assumption for the first couple of years of construction and it is extremely unlikely that the site will consistently deliver the same 'maximum' number of dwellings across the whole build period when infrastructure triggers are taken into account. There are likely to be fluctuations in delivery which should be considered.

Paragraph 22 of the NPPF states that:

“Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.”

Local Plan Policy 7 in relation to Meecebrook states that development can only commence once a route to funding and delivery has been identified. This includes any necessary strategic highways and infrastructure upgrades. In order to be compliant with Paragraph 22 of the NPPF the Local Plan would need to set out the necessary strategic highways and infrastructure upgrades. This point is also relevant in relation to issues associated with the duty to co-operate highlighted above, as National Highways and Network Rail are statutory consultees.

Bellway was part of a consortium of interested parties that commissioned a review of the proposals for a new railway station at Meecebrook and associated technical work. The review was undertaken by an independent consultant, Intermodality. This is attached as **Appendix A** to these representations.

The Intermodality Report highlights several key issues and areas of risk in developing a brand new, multi-platform station on the West Coast Main Line (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;
- The conclusion from previous work undertaken by 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 previous work undertaken by SLC that the station business case would achieve a Benefit Cost Ratio (BCR) of 1.5, at the low end of the range for “medium” value for money.

The review highlights that 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 Train Operating Companies (TOCs), Rail Freight Operating Companies (FOCs), Department for Transport (DfT) and other industry stakeholders. A Freedom of Information Request to Network Rail that is included with the review highlights that no engagement appears to have taken place with Network Rail at this stage.

Table 2 of the review sets out how the work undertaken to date aligns with Network Rail’s guidance on investment in stations and highlights key gaps in the work undertaken to date.

The review concludes that, as recommended by the Council’s own advisers, the merits, deliverability and acceptability of the proposed new station can only be confirmed with proper input from Network Rail, at least up to Engineering Stage 2 of the company’s corporate governance for assessing new stations (Project Acceleration in a Controlled Environment or PACE), as well as input from other key stakeholders, including but not limited to:

- 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;
- FOCs, namely Colas Rail, DB Cargo, DC Rail, DRS, Freightliner, GB Railfreight and Varamis Rail;
- Rail Delivery Group and the Rail Freight Group;
- DfT;
- Office of Rail & Road.

Agreement in relation with Staffordshire County Council and bus operators will also be required. The Sustainability Appraisal⁸ accompanying the Local Plan states at page 96: “the question arises as to whether one or more high quality (i.e. fast and frequent) bus services could effectively link Stoke-on-Trent and Stafford via both Meecebrook and Stone. This is a detailed question for the County Council and the bus companies.” Page 96 of the SA also notes that “*There would also be a need to carefully consider traffic flows, including noting that the new red line boundary, since the Issues and Options stage is further from the M6 corridor and closer to the A5013. There would be a clear need to consider traffic flows through Eccleshall, and there are likely to be other sensitive / hotspot roads and junctions.*”

Paragraph 106 of the NPPF requires planning policies to be prepared with the active involvement of local highways authorities and other transport infrastructure providers and operators so that strategies and investments for supporting sustainable transport and development patterns are aligned. In order to comply with the NPPF issues around delivery of the railway station and highways and other infrastructure associated with Meecebrook need to be front loaded and addressed in the Local Plan, rather than development being dependent on them being addressed.

In regard to the wider infrastructure proposed to support a settlement of 6,000 dwellings, contrary to NPPF paragraph 31, there is very little information included within the evidence base documents to set out what level of infrastructure is required and whether its delivery is viable or deliverable. The Council’s Viability Assessment (September 2022)⁹ is based on very high level assumptions and clearly sets out that so far there has been little input on likely infrastructure costs. Paragraph 73 of the NPPF states that policies for new settlements should “*ensure that appropriate tools such as masterplans and design guides or codes are used to secure a variety of well-designed and beautiful homes to meet the needs of different groups in the community*”. However, the Viability Assessment (paragraph 6.42) concludes that in order to deliver 40% affordable housing and be viable, the development would not be able to meet other policy requirements and is likely to impact on the quality and future-proofing of the site (e.g. accessibility standards, electric charging points etc). As the largest allocation in this plan period (and potentially the next plan period with a further 3,000 dwellings expected), for this site to potentially not deliver affordable housing or other policy requirements seeking to meet future homes standards is unacceptable and will be contrary to paragraph 60 of the NPPF as the specific housing needs of different groups will not be addressed .

Page 86 of the Viability Assessment confirms that there is a lack of clarity around landowner commitment. In order for SBC to demonstrate that this site is ‘deliverable’, there should be clear evidence to demonstrate that all of the landowners within the proposed Meecebrook allocation are willing for their land to form part of the allocation and have agreed to collaborate to bring a development of this scale forward. This is particularly important for a development of this scale given this site will be delivered over a long period of time and will involve complex equalisation

⁸ <https://www.staffordbc.gov.uk/interim-sustainability-appraisal-report>

⁹

<https://www.staffordbc.gov.uk/sites/default/files/cme/DocMan1/Planning%20Policy/New%20Stafford%20Borough%20Local%20Plan%202020-2040/Evidence%20Base%20Documents/Stafford-Borough-Council-Local-Plan-and-CIL-Viability-Assessment-Accessible.pdf>

agreements to deliver the joint infrastructure. Without landowner support, how is SBC expecting to deliver the site in such over-ambitious timescales?

Policy 7 of the Local Plan also refers to a Framework Masterplan Supplementary Planning Document (SPD) being prepared for the site, including consideration of phasing, which could also add to lead in times. An SPD cannot allocate land for development, as it does not form part of the development plan, which means that decisions around the location of the local centre, employment and railway station will need to be made as part of Local Plan preparation so that these can be identified on the Local Plan proposals map.

The Inspector for the examination into the Tunbridge Wells Local Plan recently raised concerns around the treatment of large scale strategic allocations in the submitted Local Plan in his initial findings.¹⁰ The Inspector raised concerns regarding the adequacy of the evidence base in relation to the new settlement at Tudeley Village (new settlement of 2,800 dwellings), as well as in relation to aspects of the growth at Paddock Wood (3,500 homes and 11 ha employment).

In relation to Tudeley Village the Inspector highlighted the need for the Local Plan evidence base to include additional information in relation to infrastructure requirements, including funding and phasing and the relationship between delivery rates and viability.

In the absence of this information in the Local Plan he concluded that the Local Plan required modification to make it sound and capable of adoption.

He concluded that providing additional information in relation to Tudeley Village would not be a quick or straightforward exercise. Modifying the policy could also add significant delays to the examination process. The third option he presented was to delete the allocation and make consequential changes to the Local Plan.

Similarly, the Inspectors Report into the Shared Strategic Local Plan for North Essex¹¹ concluded in relation to the Garden Community proposals that they need demonstrate a reasonable prospect of being viably developed, setting out clear details of phasing of necessary infrastructure linked to a delivery timetable and that any garden community proposals must be clearly shown to be financially viable.

The above highlights the importance of the Local Plan front loading relevant issues in relation to the delivery of Meecebrook at the time it is submitted.

In summary, Bellway considers that the proposed allocation of land at Meecebrook for 3,000 dwellings is contrary to the NPPF (paragraph 73) as the site is not well-located, the planned rail infrastructure is likely to be undeliverable and the proposed rates of delivery and lead-in time are not realistic or supported by any evidence. Bellway therefore considers that additional housing sites should be allocated adjacent to the existing and sustainable Tier 4 settlements in place of Meecebrook. Should SBC have an aspiration to deliver a new settlement in the long term then further feasibility and technical work should be undertaken and it should be clear within the emerging Local Plan that it will not form part of the housing requirement until there is more certainty on its deliverability.

Given the concerns associated with the delivery of Meecebrook, Bellway objects to the proposed allocation.

2.3 Contributions from other Settlements

Under the Preferred Options Local Plan, the broad spatial distribution of housing is:

¹⁰ https://forms.tunbridgewells.gov.uk/data/assets/pdf_file/0007/434392/ID-012-Inspectors-Initial-Findings.pdf

¹¹ <https://www.braintree.gov.uk/downloads/file/2940/examiners-report-on-the-examination-of-nea-s1-10th-dec-2020>

- windfalls – (6%)
- Stafford (59%)
- Stone (7%)
- Meecebrook (24%)
- Larger settlements (4%)
- Smaller settlements (≤ 1%)
- Rural area (≤ 1%)

The Council has assumed that 750 homes come forward as windfall sites in the plan period (50 homes per annum) but the Local Plan does not provide any evidence as to why this figure is justified. Paragraph 71 of the NPPF notes: *“Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends.”* It is considered that in order to comply with the NPPF, SBC should clearly set out within the evidence what the historic windfall delivery rates have been in the Borough.

The delivery rates assumed for the Northern Stafford and Western Stafford SDLs set out in Table 13 of the Council’s Paper on Build out Rates also look high for the period 2026/7 to 2029/30 when compared with the Council’s own assumptions set out in the paper for sites of that size and are also higher than recent historical rates achieved at the sites.

Currently, only 234 homes are proposed through new allocations in Larger Settlements over the plan period. Settlements that can provide a sustainable location for growth, currently categorised within these groups should have a greater role in meeting housing needs, given the uncertainties associated with delivery at Meecebrook. The settlement hierarchy is discussed below in the response to draft Local Plan Policy 2.

The lack of provision in the Larger Settlements is not consistent with Paragraph 20 of the NPPF, which requires strategic policies to set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for housing (including affordable housing).

The lack of provision in the Larger Settlements is also not consistent with Paragraph 60 of the NPPF which states in part that: *“To support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed.”*

Paragraph 69 of the NPPF also notes that small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly.

The Council’s own analysis of settlements¹² demonstrates how the Larger Settlements can contribute to sustainable development in terms of:

- *“supporting support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being.”* (NPPF Paragraph 8b)
- Supporting a prosperous rural economy – NPPF Paragraph. 84.d *“...the retention and development of accessible local services and community facilities, such as local*

¹² <https://www.staffordbc.gov.uk/revised-settlement-assessment-and-profiles-topic-paper>

shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.”

- Promoting Sustainable Transport – NPPF paragraph 105 *“Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.”*
- Promoting healthy and safe communities – NPPF Paragraphs. 93.a, c and e *“To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:*
 - *a) plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;*
 - *c) guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community’s ability to meet its day-to-day needs;*
 - *e) ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.”*
- Promoting healthy and safe communities – NPPF Paragraph. 95: *“It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education.”*
- Promoting healthy and safe communities – NPPF Paragraph. 98: *“Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change.”*

The Council’s review of the settlement hierarchy¹³ states that distance to Stafford, Stone, Eccleshall and the North Staffordshire Urban Area where there is a range of retail, employment, education and community services, also referred to as the ‘main settlements’ is a key criterion in relation to accessibility. Despite Eccleshall’s position as a main settlement no new allocations are proposed. This is partly attributed by the Council to lack of capacity in existing secondary schools (which could be addressed) and also partly justified on the grounds of recent rates of housing growth at Eccleshall, but the rate of growth envisaged at Meecebrook would be significantly higher and is considered acceptable by the Council.

Eccleshall provides a highly sustainable location for growth that should play a greater role in meeting housing needs in the plan period.

2.4 Settlement hierarchy

The settlement hierarchy set out in Local Plan Policy 2 is integral to the spatial strategy. Meecebrook is identified as a new tier (Tier 3). Given uncertainties around its delivery it seems premature to identify the proposal in this way. Without the rail infrastructure, Meecebrook should not be considered as a more sustainable development opportunity than existing settlements listed under Tier 4.

¹³ <https://www.staffordbc.gov.uk/revised-settlement-assessment-and-profiles-topic-paper>

2.5 Sustainability Appraisal

The Sustainability Appraisal includes consideration of potential strategic allocations, including Meecebrook. The SA makes numerous references to the potential for a railway station at this location but then flags uncertainty in this respect. It is suggested that, this option is assessed under two scenarios, one with a train station and one without. This would then help make the assessment of this option more transparent. There are various comments in relation to Meecebrook offering opportunities for decarbonisation but no firm proposals are presented in the SA. All new dwellings will need to comply with the Future Homes Standard from 2025 and decarbonising of the electricity system continues.

The SA also includes consideration of various combinations of sites based on a 'to find' figure of 2,150 homes for additional allocations but this is predicated on some allocations, including Stafford Station Gateway being included in all of the options (page 5 of the non technical summary)¹⁴. The options considered include an option based on growth at Gnosall, Hixon and Weston (Option 1). The number of dwellings associated with this option is not clear because two options are identified for Hixon (128 homes or 1,985 homes associated with development at Hixon Airfield). Given the to find figure of 2,150 homes it is not clear what assumptions have been made about the capacity of the sites that contribute to Option 1. Taking the capacity for Gnosall (463 dwellings), 128 dwellings at Hixon and 175 dwellings at Weston would provide 766 dwellings, which is 1,384 short of the 'to find' figure. It is not therefore clear if Option 1 represents a reasonable alternative (couched in the terms of the approach taken in the SA).

Given the number of sites that the Council has identified the grouping of sites in this way is considered unnecessary. The site selection process should adopt an approach based on the position of settlements in the hierarchy, consideration of local housing need, informed by a housing need assessment by settlement, the planning merits of each of the shortlisted sites and consideration of whether or not their allocation is necessary (consistent with Paragraph 23 of the NPPF).

2.6 Failure to Identify an Appropriate Strategy

As noted above, the Local Plan assumes that Meecebrook provides 24% of housing supply between 2020 and 2040, but delivery is not anticipated to commence until 2030 and then at a constant rate of development (300 dpa) that is not considered to be realistic, particularly in the earlier phases of the development. Larger settlements contribute just 4% of supply and smaller settlements 1%. Given uncertainties in relation to delivery of Meecebrook, this is not considered to be an appropriate strategy.

Given uncertainties in relation to the delivery of Meecebrook, the Local Plan should include greater allowance for development at other settlements in order to ensure that it has been positively prepared (consistent with Paragraph 35 of the NPPF). A housing needs assessment is needed for the Large Settlements to inform an evidence-based distribution of development, to ensure that market and affordable housing needs can be met, the viability of local services and facilities supported and new infrastructure investment secured (via CIL/S106). This evidence would sit alongside the Settlement Assessment and SHELAA to help ensure a robust and justified approach to securing a sustainable spatial strategy (i.e. directing growth to where it is needed, where it is sustainable and where there are deliverable sites). Reduced reliance on Meecebrook would also ensure a steady supply of affordable housing throughout the plan period.

Policy 12 of the Local Plan should be updated to reflect additional allocations required to meet the shortfall identified from Meecebrook and provide a more meaningful contribution towards meeting

¹⁴ <https://www.staffordbc.gov.uk/interim-sustainability-appraisal-non-technical-summary>

the adjacent HMAs' needs. These allocations should be in the larger settlements and should include Bellways land and should include Bellways land to the South Stone Road, Eccleshall.

2.7 Conclusions on the Proposed Development Strategy

Given the above concerns it is concluded that the approach set out in the **Preferred Options Local Plan does not comply with paragraph 35 of the NPPF in that it is:**

- not positively prepared, with Paragraph 1.4 of the Local Plan suggesting that unmet need from neighbouring areas might not be accommodated in the event that Meecebrook cannot deliver 3,000 homes within the plan period;
- not justified, given uncertainties around the delivery of the Garden Community as reliance on it is not an appropriate strategy;
- not effective – as the 3,000 dwellings at the Garden Community may not be deliverable over the plan period;
- not consistent with national policy – given the failure to ensure a balance homes and planned job growth and provide a long term vision, consistent with paragraph 22 of the NPPF.

2.8 Changes sought to the Spatial Strategy

The Local Plan should plan for additional housing growth, including needs arising from neighbouring local authorities.

The Local Plan should commit to meeting un-met housing need arising from neighbouring areas and identify sites that will help meet such needs across the plan period. Provision of such housing should not be contingent on Meecebrook coming forward at the rate anticipated in the Local Plan.

Meecebrook should not be relied upon to deliver growth in the plan period as the delivery of the site is uncertain and the assumptions for delivery on site are not justified. Considerations around the duty to co-operate and the need for the Local Plan to provide a long term vision, consistent with paragraph 22 of the NPPF suggest that uncertainties around the delivery and viability of Meecebrook could delay the Local Plan. These are significant areas of uncertainty relating to whether or not the site will accommodate a new railway station and what upgrades would be required to the strategic road network. Should SBC have an aspiration to deliver a new settlement in the long term then further feasibility and technical work should be undertaken and it should be clear within the emerging Local Plan that it will not form part of the housing requirement until there is more certainty on its deliverability.

The spatial strategy should allow for allocation of land for housing at other sustainable settlements, such as the Larger settlements, including Eccleshall. A housing needs assessment is needed for the Large Settlements to inform an evidence-based distribution of development, to ensure that market and affordable housing needs can be met, the viability of local services and facilities supported and new infrastructure investment secured (via CIL/S106). This evidence would sit alongside the Settlement Assessment and SHELAA to help ensure a robust and justified approach to securing a sustainable spatial strategy (i.e. directing growth to where it is needed, where it is sustainable and where there are deliverable sites).

The settlement hierarchy at Policy 2 should be amended. Meecebrook does not warrant identification as a new tier at this stage. It should at least be caveated or could be identified with the larger settlements until such time as it has the critical mass to warrant separate categorisation, should it go ahead.

Given the concerns outlined above, Policy 7 in relation to Meecebrook should be amended to reflect the longer term nature of the proposal and not relied upon to deliver housing requirements within the plan period.

3. Land to the South Stone Road, Eccleshall

3.1 Introduction

The Council has assessed sites submitted through the SHELLA.

A total of 290 sites were assessed in stages:

- Stage 1 - sites with constraints rendering them non developable were rejected (after having considered the potential to adjust site boundaries to address the issue). 217 sites progressed beyond this stage.
- Stage 2 – reject sites not well linked to a settlement. 156 sites progressed beyond this stage.
- Stage 3 – further detailed work, including engagement with consultants and key consultees.
- Stage 4 - evidence-based decision to select or reject sites. 57 sites progressed beyond this stage (9 of them related to Meecebrook).

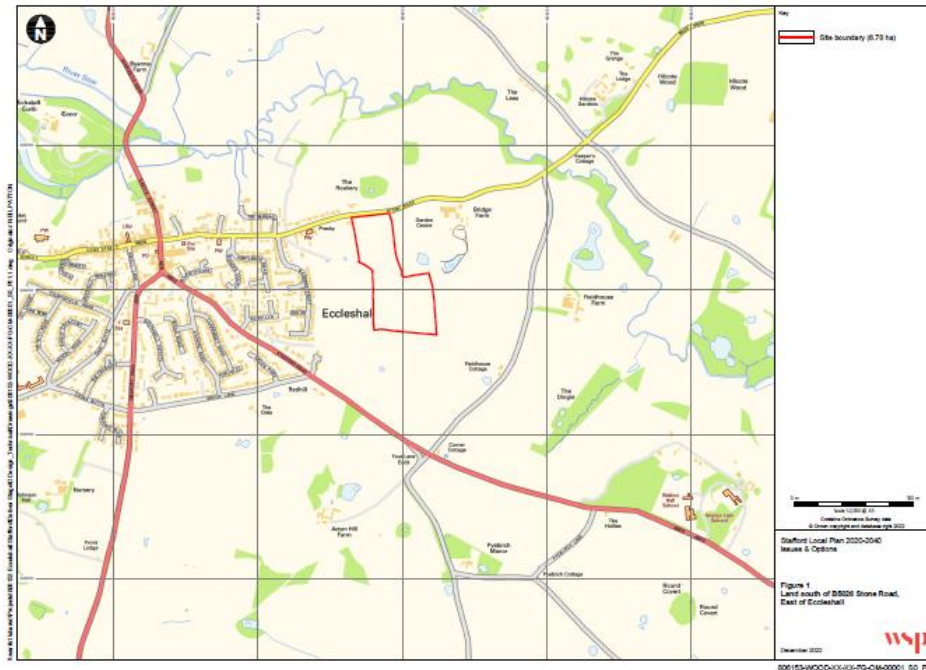
The site progressed beyond Stage 4. This section of our response comments on the Council's evaluation of the Site.

This response is structured around the criteria used by the Council to evaluate sites but consideration is first given to the boundary of the Site. **Appendix B** includes additional information in relation to school places and **Appendix C** provides additional information in relation to site access.

3.2 Site Area

Details of the Site were submitted to the Council in a response to the SHEELA. The site area was subsequently shown incorrectly in the SHEELA (site reference ECC02) and this error was carried forward into the technical work for the Local Plan. From subsequent correspondence with the Council, it is understood that the SHEELA will be updated in 2023. The Council should revise the boundary of the assessed site to reflect the boundary that was originally submitted, this is shown on **Figure 3.1**. below:

Figure 3.1 Site Location



Details of the site were submitted with a Vision Document informed by initial technical work covering accessibility and transport, ecology and landscape. The Vision Document is included with this submission.

3.3 The Council’s Assessment of the Site

The Council’s assessment of the shortlisted sites considered the following topics:

- education
- transport
- ecology
- landscape
- heritage
- water
- electricity

These are commented on below as they relate to the Site.

Education

The Council’s assessment concludes that Bishop Lonsdale CE Primary Academy has limited capacity to accommodate further new houses within Eccleshall, and it cannot be expanded.

The Council’s assessment concludes that Sir Graham Balfour High School cannot accommodate further new houses within existing capacity and the school cannot be expanded.

An assessment of school places has been undertaken by EFM Education Specialists and is provided at **Appendix B**. This highlights that Bishop Lonsdale CE Primary Academy has recently

expanded to 1.5FE (45 pupils per year group) and therefore has capacity for 76 pupils, which far exceeds the child yield of this Site.

Sir Graham Balfour School is a 6FE Secondary School that serves Eccleshall. Due to the distance, from the settlement to the school, Staffordshire County Council (SCC) provides school transport. The school is grouped with five additional schools to form the Stafford Secondary Planning Area. The schools will be full by 2027/28.

It is understood that SCC plan to build a 5FE (750 pupils in years 7-11) secondary school. It is also understood that SCC do not currently have a site secured to deliver this provision. In the meantime, additional provision will be provided via expansion projects. On the basis of the rising rolls and the fact that the nearest school to the development is predominantly full, it would not be unreasonable for SCC to request planning obligations towards the additional provision commensurate to the child yield. However, it is clear that there is no Secondary Education related reason for development not to come forward, as expansions and new provision is planned by SCC to accommodate the growing area.

The Council should plan positively to address current and emerging constraints in secondary educational school capacity, rather than letting this unduly influence the allocation of sites. Paragraph 95 of the NPPF states that: *“It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education.”* This includes giving *“great weight to the need to create, expand or alter schools through the preparation of plans”*

Transport

The Council's assessment states that access to the site would need to be improved with a possible right turn into the site. The previously submitted Vision Document notes that vehicular access can be achieved off Stone Road via a ghost island right turn junction with the 30mph speed limit extended and reinforced with traffic calming along the B5026 to the east. **Appendix C** provides a preliminary drawing demonstrating the feasibility of a ghost right turn junction for Stone Road that has been prepared by MODE.

The Council's assessment also says that the Public Right of Way (PRoW) that crosses the site needs further investigation, and concludes that it is likely that only the north section of field above the PRoW will be accessible and developable. The Vision Document demonstrates that the existing PRoW can be retained and enhanced, improving connectivity between the Site, Eccleshall and surrounding countryside. Incorporating the PRoW into the proposed development and enhancing it is consistent with Paragraph 100 of the NPPF, which states that *“Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users.....”*

It is not clear why the Council concluded that only the area to the south of the PRoW could be developed. The Vision Document demonstrates that there is potential to retain and enhance the PRoW, develop the northern part of the site, with enhanced landscaping and provision of open space on the eastern side of the site. The Council's own assessment in relation to landscape (discussed below) also suggests the whole site could be developed.

Eccleshall is recognised in the Local Plan evidence base as a main settlement. This reflects the services and facilities that the town provides and its role in serving the wider rural hinterland. The Vision Document for the Site notes that a range of facilities are within 5 to 10 minutes walking distance of the Site and include a post office, public library, doctors' surgery, dentist, pharmacy, veterinary surgery and optician. The centre includes restaurants, cafes, public houses and several shops.

Ecology

The Council's assessment identifies the site as having low overall ecological sensitivity and identifies it as being within a risk impact zone for Great Crested Newt. The Council's Ecological Assessment Report¹⁵ states in relation to GCN – where there are ponds either on site or nearby (a minimum of 500 metres up to 2 km from the site boundary), a new survey should be carried out to determine whether GCN are resident. The Council's assessment notes that entailed protection and mitigation proposals will be a legal requirement and further specialist work will be needed.

The Council's Ecological Assessment Report for the site identifies the following measures that could be incorporated into development at the site:

- Remaining hedgerows on site provide some habitat connectivity and should be conserved;
- Buildings may have some potential for bat roosting and should be surveyed by an appropriate experienced surveyor (note there are no buildings on the Site, the buildings referred to fall outside of the site boundary);
- Incorporate species rich grassland creation/enhancement into any design schemes.
- Retain the small area of woodland to benefit habitat connectivity;
- Parts of the site may be suitable for the implementation of natural flood management (NFM) interventions which would not only provide flood resilience as well as additional habitats;
- Retain pond and areas of open water if necessary, seek to restore their ecological quality. Ensure that they are effectively protected and that no run-off or pollutants are allowed to enter and degrade the habitat or water quality e.g. via SuDS;
- Loss of semi-natural habitat and replacement with more impermeable surfaces could lead to compounding and increased risk of flooding from watercourses and surface water both on site and elsewhere.

The Vision Document was informed by an ecological technical note and the proposals reflect the recommendations in the Council's Ecological Assessment Report. For example, the small area of woodland is retained and ponds enhanced. The opportunity for sustainable drainage features to be incorporated within a central green-blue corridor approximately following the path of the Public Right of Way through the centre of the Site has been identified in the Vision Document. Biodiversity Net Gain is therefore a deliverable and realistic prospect for this site. Ecological surveys would form part of any future planning application. The site is suitable from an ecological perspective.

Landscape

The Council's assessment¹⁶ identifies the site as Medium overall landscape sensitivity and identifies the need to consider the skyline to the south and extension of current development further east. The need to provide landscape buffers to the south and east is identified. Retention of the existing footpath through the site and existing vegetation is recommended. Finally the Council's assessment notes that ideally the site would come forward with site ECC06.

The Vision Document and accompanying Landscape Technical Note identified the opportunity to retain and strengthen planting on the Site's boundaries and the proposals retain and enhance the

¹⁵ <https://www.staffordbc.gov.uk/stafford-borough-ecological-assessment-report>

¹⁶ <https://www.staffordbc.gov.uk/stafford-borough-landscape-sensitivity-study-report>

PRoW as part of a corridor of public open space. The site is capable of being designed to respond to the landscape sensitivity. The north east of the site would be most suited to sustainable drainage features, as it is relatively low lying.

The comment in relation to ECC06 is noted, however the Site is being promoted as a stand-alone site and the Vision Document and accompanying Landscape Technical Note demonstrate that it is capable of coming forward on that basis. The site is deliverable on its own and is not reliant on other sites coming forward.

Heritage

The Council's site evaluation notes there are low direct impacts, low setting impacts and no substantial harm in relation to heritage.

The detailed assessment accompanying the Council's evaluation¹⁷ Notes that no heritage assets are recorded on the site on the Historic Environment Record although the survival of relict cultivation 'strip' that are preserved as field boundaries to the east and west of the Site suggests that it was under-cultivation during the medieval period. The Council's assessment concludes that, should the Site be allocated then, any planning application should be accompanied by a heritage impact assessment which should consider the potential for both direct and setting impacts. Mitigation measures including a trial trench evaluation and or/ geophysical survey are also recommended in order to address the potential for direct impacts upon any archaeological remains that may be present. These matters would be addressed as part of a planning application and there are considered to be no heritage matters which would preclude the site coming forward.

Water

The Council's site evaluation notes that there is low impact on sewerage infrastructure and medium potential impact on surface water sewerage infrastructure. The Site is sequentially preferable lying outside of the EA's flood risk zones. The Vision Document identifies the potential to work with the existing topography on the Site to utilise the gentle fall to guide the sustainable urban drainage. Consistent with the Council's conclusions, Bellway are not aware of any technical impediments in respect of infrastructure that could not be addressed.

Electricity

The Council's site evaluation states that there are no issues in relation to electricity. Bellway are not aware of any technical impediments in this respect that could not be addressed. In terms of achieving a reduction in energy use, Bellway is undertaking extensive work to redesign homes to meet the new energy efficiency standards. The company is building various exemplar homes in advance of the new Future Homes Standards which includes monitoring performance and running costs for the long term benefit of customers.

Outcome of the Council's Site Assessment

The Council's stated reason for rejecting the site is that education capacity constraints are unlikely to be resolved. The assessment of school places at **Appendix B** notes that the Bishop Lonsdale CE Primary Academy has recently expanded and has capacity to accommodate child yield of this Site. There is a clear need to plan for new secondary places and it is understood that new provision is planned by SCC. Paragraph 95 of the NPPF states: *"It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this*

¹⁷ <https://www.staffordbc.gov.uk/stafford-borough-historic-environment-site-assessment-stage-1-report>

requirement, and to development that will widen choice in education.” Measures identified in the NPPF include giving great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications. Current and emerging constraints relating to educational capacity should not therefore unduly influence the allocation of sites. S106 contributions would be made towards new education places.

Conclusions

Eccleshall is acknowledged in the Local Plan’s evidence base as a main settlement. It represents a sustainable location for growth. The Council’s own assessment confirms that the site is suitable in terms of transport, heritage, landscape and infrastructure considerations. The Council should plan positively to address identified capacity issues in relation to secondary education provision as demonstrated by SCC’s intention to provide a new secondary school to meet existing and future demand. The Vision Document demonstrates that a high quality new neighbourhood can be readily accommodated at the Site and development can be brought forward in the short term by a national housebuilder.

Changes sought to the Local Plan

Going forward the consideration of the Site should be on the basis of the site boundary previously provided to the Council.

Eccleshall is a highly sustainable settlement that is clearly suitable for further development. The site is in a sustainable location being walkable to key services and facilities, there are no technical or environmental constraints to development that cannot be addressed through a sensitive, carefully planned masterplan. The Site is available, the promoter, Bellway is a housebuilder committed to bringing the site forward in the short term. This will assist the Council through delivery of market and affordable homes in a highly sustainable settlement. The site should therefore be allocated in the Local Plan.

Appendix A Meecebrook – Review of new passenger station proposals, Intermodality

Meecebrook

Review of new passenger station proposals

5th December 2022

Document history

Date	Version	Issued to	Status	Quantity	Format	Approved
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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:

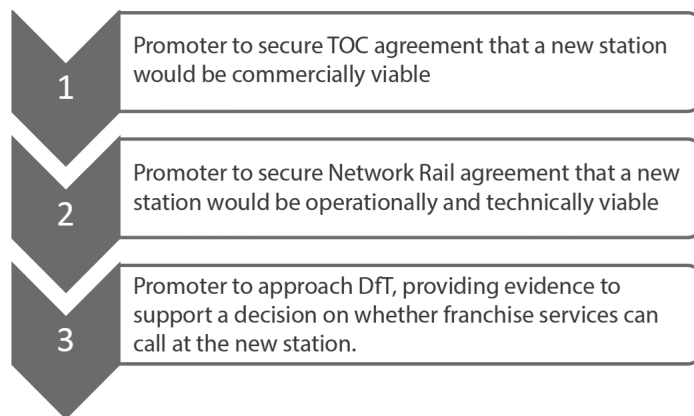
⁴ Pages 3-4

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

¹² 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>

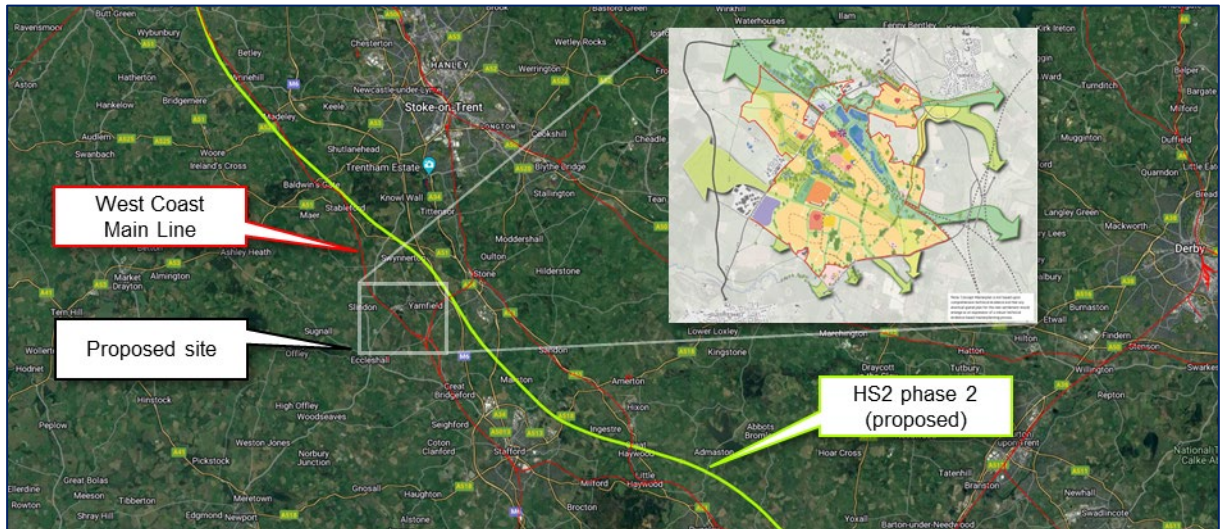
¹⁶ <https://governance.wmca.org.uk/documents/s5126/Report.pdf>

3 The proposed site

3.1 Location

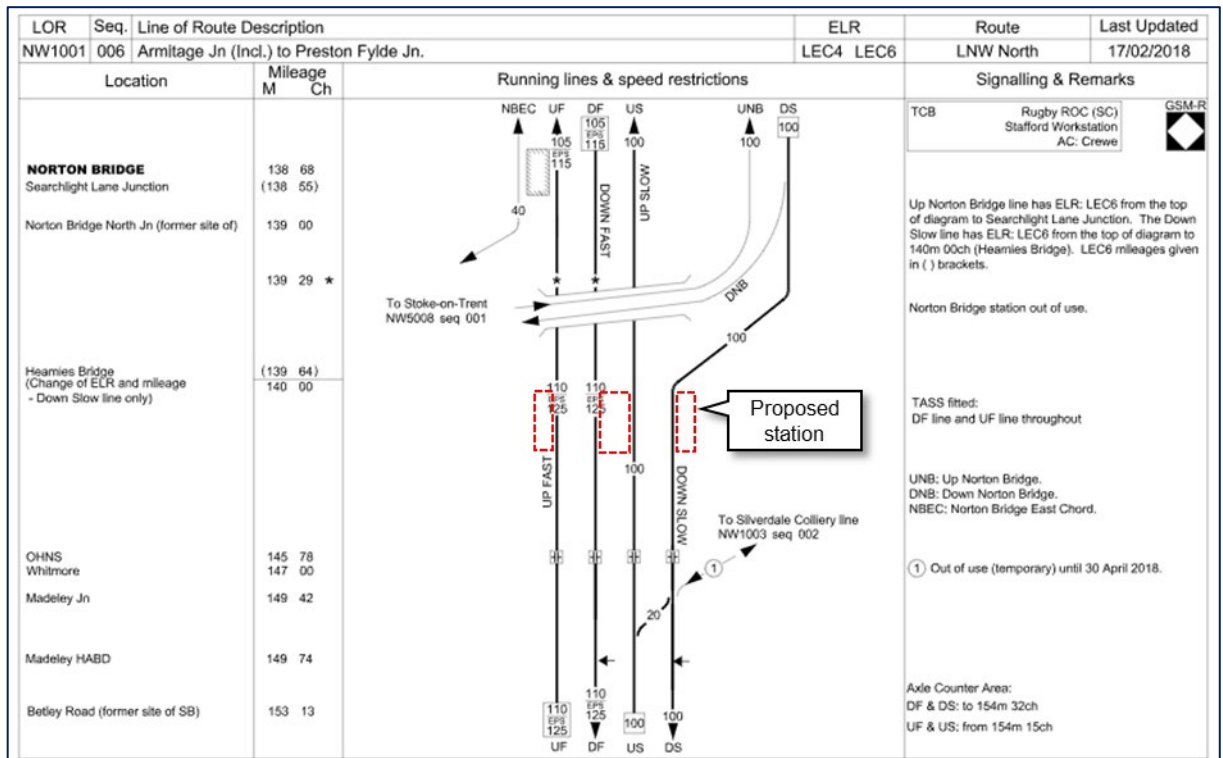
3.1.1 The location of the site relative to the West Coast Main Line (WCML) is shown in the Figure below:

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



31 October 2022

[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".

Intermodality



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Appendix B Education Landscape Assessment, EFM



9th December 2022

Bellway Homes Limited
BY EMAIL ONLY

REF: LAND EAST OF ECCLESHALL, STAFFORDSHIRE

The purpose of this Education Landscape Review is to establish whether there is currently sufficient capacity in local schools for the pupils expected to be living on this development site, both currently, and in the future.

This is in relation to a development of circa 140 residential dwellings on land East of Eccleshall, Staffordshire, shown below in Map 1:



Map 1: Approximate Development Site

The development is within the Eccleshall Ward (“the Ward”) within the Stafford Borough Council (“SBC”) planning area. The Education Authority for the area is Staffordshire County Council (“SCC”). The Ward boundaries can be seen below in Map 2:



Map 2: Eccleshall Ward Boundary

SBC does not currently operate a Community Infrastructure Levy (“CIL”). It is stated on their website¹:

Stafford Borough Council started to develop a CIL charging schedule in 2015 but it was put on hold due to changes in Government policy. It is anticipated that the work will re-commence as part of the review of the Local Plan.

For a planning obligation to be acceptable it must be necessary. In respect of an education planning obligation, to be necessary, there must be an insufficient number of places to

¹ <https://www.staffordbc.gov.uk/community-infrastructure-levy-cil>

accommodate the forecast number of children seeking a school place forecast to arise from the proposed development to which the obligation is linked. Thus, the obligation must be linked to a change (upwards) in the official number of school places.

The necessity requirement dictates that there must be the equivalent increase of the Capacity and Admission Number of a school that would serve the development. The Capacity of a school is published differently depending upon its type. The Admission Number is the number of places for each age group. For a maintained school (maintained by the local education and children's services authority) it is the Net Capacity, and for an Academy/Free School it is set out in the Funding Agreement with the Education Secretary of State. This obligation on the Council should be stipulated in the Section 106. The same principles should be applied to the SEN contribution, if it is deemed appropriate. "Improving" educational facilities is not appropriate use of planning obligations. Pre-existing deficits, upgrades and maintenance issues are funded from different sources.

This document will undertake the following tasks: firstly, it will look at the child yield multipliers utilised by SCC in order to ensure that they are appropriate for the area; second, it will look at the planning obligation cost multipliers utilised by SCC to ensure they are in line with the national averages and the Department for Education's ("DfE") Guidance, Securing Education Planning Obligations (November 2019) which is endorsed by MHCLG PPG Paragraphs: 007 Ref ID: 23b-007-20190315 and 008 Ref ID: 23b-008-20190315; finally, it will look at the Education landscape, in order to establish whether planning obligations are appropriate and required under the CIL Regulations, specifically the tests of CIL Regulation 122. This note looks specifically at Primary and Secondary School provision (including Sixth Form), Early Years, and SEN provision, as SCC is likely to consider the need for funding towards all of these Educational elements.

To first discuss the child yield multipliers utilised by SCC:

Child Yield

Staffordshire County Council adopted their Education Infrastructure Contributions Policy² in March 2021. This Policy includes their most recent child yield multipliers, which are reproduced in the Table below:

² <https://www.staffordshire.gov.uk/Education/Schoolsandcolleges/PlanningSchoolPlaces/Information-for-developers/Planning-policy.aspx#Introduction>

Area	PPR per dwelling per Year Group		PPR per dwelling
	Primary	Secondary	Sixth Form
Stafford	0.03	0.03	0.03
	$0.03 \times 7 = 0.21$	$0.03 \times 5 = 0.15$	0.03

Table 1: SCC Child Yield Multipliers for the SBC Area

Stafford’s child yield multipliers are the average for the county, with Cannock, Lichfield, and Tamworth seeing high expected yields. Utilising the child yield multipliers shown above in Table 1, against a development of circa 90 dwellings would generate the following:

- $140 \times 0.21 = 29$ Primary School aged children (4 per Year Group);
- $140 \times 0.15 = 21$ Secondary School aged children (4 per Year Group); and
- $140 \times 0.03 = 4$ Sixth Form aged children.

Furthermore, SCC utilises a child yield of 0.09 pupils for early years, and 0.0042/0.0088 for Primary/Secondary SEN respectively. This would generate the following:

- $140 \times 0.09 = 13$ Early Years aged children;
- $140 \times 0.0042 = 0.59$ Primary SEN children; and
- $140 \times 0.0088 = 1.23$ Secondary SEN children.

In each of these cases shown above, the child yield numbers discussed can be considered the “worst case scenario”, as this does not factor in any, for example, elderly residential accommodation, or one-bedroom dwellings; the more of any of these types of dwellings that reside on the development, the lower the child yield will be expected to be.

Net migration to new dwellings increases the number of pupils locally, but this need is predominantly focused in Reception Year in the Primary phase, and Year 7 in the Secondary phase. If a child is already in a Primary or Secondary School when they move on to this proposed development, they are very unlikely to change schools once habits have been formed. It is fair to say that a proportion of the children moving in to the new homes will

already be in the school system, as a proportion of people moving in to new homes do not move far. There is also the consideration that a proportion of pupils will attend Independent Schools (there are at least 2 in Stafford, and 12 in the whole county). Therefore, the likely impact on the school system will be less than forecast, and should be focused in either Reception Year or Year 7, as any other year group would likely necessitate a change of school.

The DfE has produced best practice guidance entitled “Securing developer contributions for education”. A key point in the Guidance is that pupil yield factors should be based on up-to-date evidence from recent local housing developments. It is assumed that SCC has taken this in to account with their child yield multipliers. At its paragraph 15, the Guidance recommends costs to be based on the published ‘scorecards’. These are DfE published financial statements of school places delivered via extensions and new schools on an individual school and number of places basis, standardised to a regional factor of 1.00 and a common date. This is discussed further below.

EFM’s own forecast trajectory for this development is based on a different methodology and measures the likely number of new children resident. Of course, a proportion of households moving to new developments do not move very far and their children do not change schools. The EFM demographic model, also working at District level, identifies a 1-year peak, which initial work has suggested is greater than the SCC formula. SCC’s multipliers are broadly consistent with the averages of most EA’s across the UK, and are not excessive. In this instance, the EFM model serves merely to substantiate that the number of pupil places associated with this development from the education authority is reasonable; the SCC child yield fulfils these criteria.

Cost Multipliers

The current SCC Policy states the following costs are utilised by SCC:

Phase of Education	Mainstream cost multiplier per pupil including weighting
Early Years/Nursery, First and Primary (including Infant and Junior schools)	£17,450
Middle	£20,738
Secondary and High	£24,026
Sixth Form	£24,026

Table 2: Cost per Pupil Place in SCC’s administrative area

SCC’s average cost for a new primary school place in the latest (2021) scorecard (which is the Department for Education’s published list of school costs for all Education Authorities nationwide) is £20,481 per pupil place, with a new secondary school place at £24,800. On the basis of this, the figures in Table 2 can be accepted.

However, SCC has stated that their costs for building a new school in 2022 are the following:

Type of school	Size of school	Total Cost
First School	1FE	£ 6,141,359
First School	1.5 FE	£ 6,668,288
First School	2FE	£ 8,106,424
Primary School	1FE	£ 7,596,058
Primary School	1.5FE	£ 9,983,703
Primary School	2FE	£ 11,378,438

Table 3: SCC New School Costs

These figures place the cost of a new 2FE primary school at £27,091 per pupil place. This is 32% higher than the average new school cost per pupil recorded in the scorecard. There has been a 10% uplift in costs from the DfE to take in to account higher build standards (such as zero carbon) but even when factoring in inflation these costs seem on the high side.

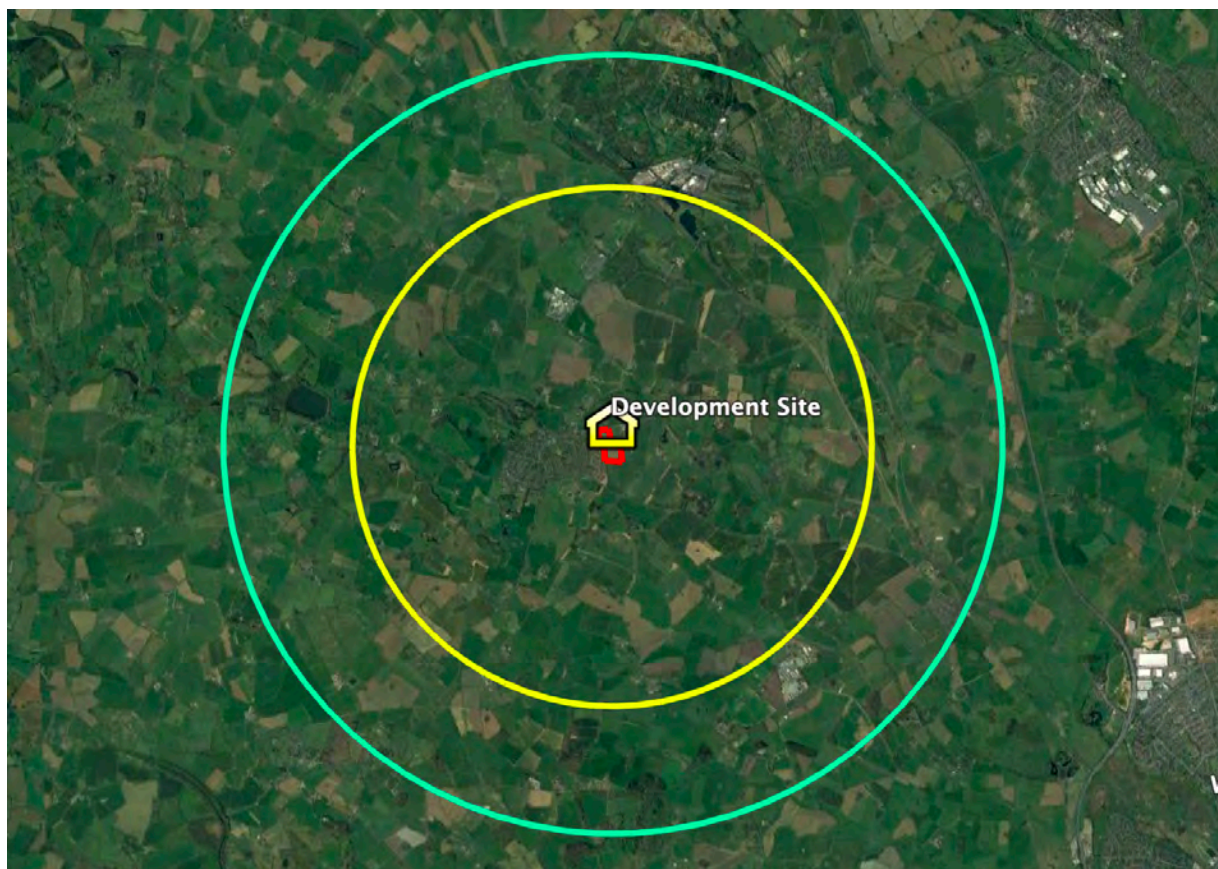
The remainder of this Report will look at the Education landscape in order to establish whether additional school infrastructure projects are necessary in order to mitigate the impact of this development:

Education

In our assessment, we consider all Primary Schools within a 2-mile walking distance³, and all Secondary schools that lie within a 3-mile walking distance of the development. The 2 and 3-mile criteria are the distances prescribed in the Education Act beyond which local authorities are required to provide/fund transport where the nearest available school is further away.

³ Distances have been calculated based upon coordinates near to the development (52.828087, -1.996104). Once the development is built out, some parts of the site will be further/closer than shown.

It is the intention of the planning system and the provision of state-funded schools that the ideal mode of travel to and from school is walking or cycling. The NPPF made this plain at paragraph 38. Paragraph 38 has been replaced by paragraph 106A in latest iteration of the NPPF (July 2021) with an exhortation to minimise the number and length of journeys. The words ‘within walking distance of most properties’ have been removed.



Map 3: Two- and Three-Mile Radius around the Development Site

The authority is required to make pupil forecasts to the Department for Education on a year of age basis by ‘school planning area’ and identify each school in the cluster and its capacity. The forecasts cover the period for which birth data is available. Forecasts covered by Section 106 agreements submitted separately to avoid double funding. For Primary School age pupils, the current published data runs to 2025/26 and for Secondary School aged pupils 2027/28. These are known as the School Capacity ("SCAP") returns. This is how Government allocates its funding for additional school places that are its responsibility to provide. The next publication of SCAP Forecasts (SCAP 2022) will be published in March 2023.

Schools should be operationally full to meet the financial audit requirement for best value from public assets. This is demonstrative of a properly functioning school system. School funding is predicated on the number of pupils that are on a school's roll, so it is in the best interest of schools to maximise intake within their capacity. Accordingly, many schools take from a wide catchment area and some enrol over capacity.

The statutory rules on enrolment are that whilst schools may have a catchment area and ordered criteria for admissions, the rules only apply if the school is oversubscribed. Otherwise, whoever applies is admitted irrespective of where they live. This is known as 'More Open Enrolment'. It fosters parental choice of school. The overarching duty to provide sufficient schools and school places rests with central Government. (Education Act 1996 Section 11) The duty excludes those otherwise provided for (private education, home schooling, those in new housing with a Section 106/CIL in place (my emphasis)).

The education authority's duty in such matters is to secure sufficient schools and school places for their area (Education Act 1996 Section 14). 'For their area':

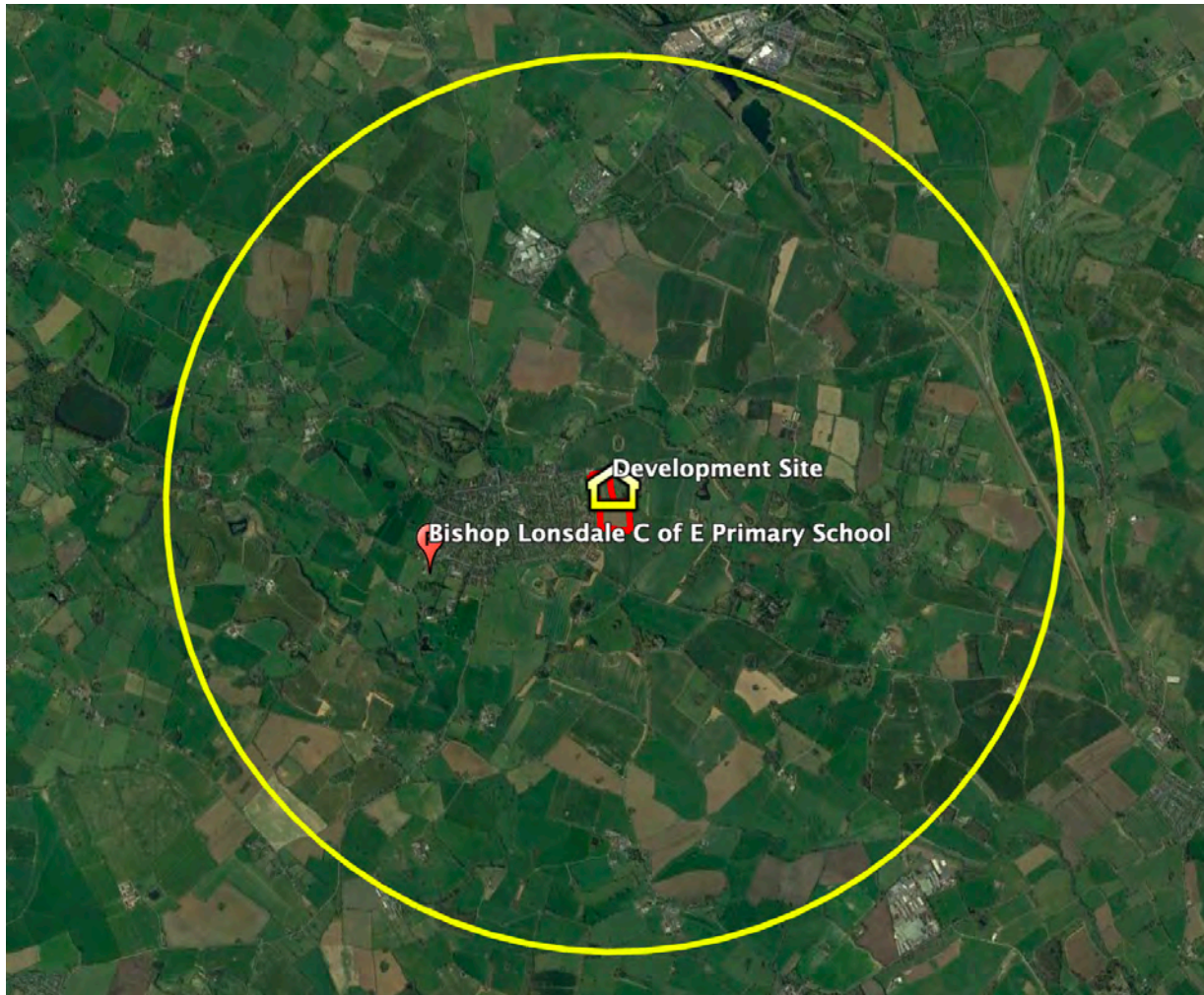
The duties of a [local] education authority do not require the authority to secure the provision of schools for pupils from outside the area of the authority, even though it may be convenient for a pupil to attend a school in an area other than that in which he lives.

Within the State-funded school sector there are Community Schools funded by the local authority, and there are other providers than the local authority; these are Academies, Free Schools, the Voluntary Sector (e.g. Church Schools) and Foundation Schools. Academies and Free Schools are funded directly by Central Government; Church Schools and Foundation Schools are maintained by the local authority.

The provision of school places, where there is a shortfall, is made via a funding stream from the Department for Education ("DfE") is known as Basic Need. Basic Need funding is allocated as 'a number of pupil places times a unit cost', differentiated by school phase and local building costs. Allocations are made on the basis of projected shortfalls in local School Planning Areas against current pupil numbers and the actual numbers of school places in that Planning Area. Each planning area is treated as a discrete area and shortfalls met through the allocation of resources. A surplus in one school planning area is not offset against another with a shortfall. In this case, providing housing in the Stafford Rural 1 Primary Planning Area (for whatever planning reason) will be reflected in the forecasts for the Stafford Rural 1 Primary Planning Area, and nowhere else.

Primary Education

There is one independent, state funded, non-selective school accommodating primary school aged pupils within a two-mile radius of the development site. The school is within the SCC administrative area, and all is within a planning area with five additional schools. Due to only one school being within an acceptable walking distance of the site, the remaining schools have been discounted. The location of the schools in relation to the development site can be seen below in Map 4:



Map 4: Schools within a two-mile radius of the development site

The most recent school roll data in the public domain (2021/22 academic year) can be seen below in Table 4:

Primary School Name	Postcode	LA Name	Distance (miles)	Capacity	PAN	NoR	Yr R	Yr 1	Yr 2	Yr 3	Yr 4	Yr 5	Yr 6
Bishop Lonsdale C of E Primary School	ST21 6AU	Staffordshire	1	210	30	239	32	40	42	26	43	28	28
TOTAL				210	30	239	32	40	42	26	43	28	28
Surplus							-2	-10	-12	4	-13	2	2
Available Surplus %							-7%	-33%	-40%	13%	-43%	7%	7%

Table 4: School Roll Data (January 2022)

PAN = Planned Admission Number; NoR = Number on Roll

The only Primary School in Eccleshall is Bishop Lonsdale C of E Primary School. This is a 1 Form of Entry school approximately one-mile walking distance from the development site. The school, as of the previous academic year, was full in four of the seven Year Groups. However, it should be noted that the school has recently expanded to 1.5FE (45 pupils per Year Group) and therefore has capacity for 76 pupils, which far exceeds the child yield of this development.

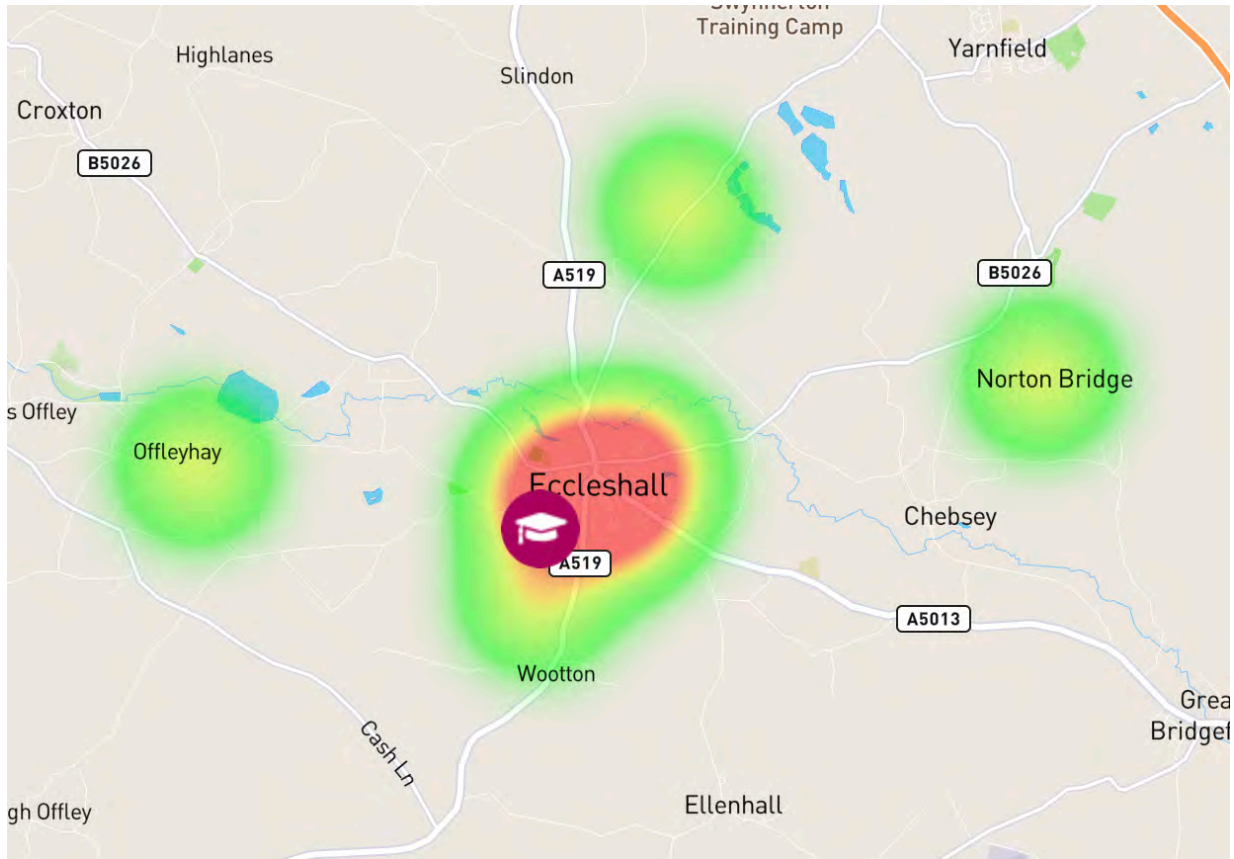
The school site is not detailed on the Land Registry. Although the Land Ownership Title for the school is not available online, from a desktop review on Google Earth, it looks like the school is on a site of over 2ha, which under the strictures of Building Bulletin 103, means that the school could expand by at least double its current size, potentially more:



Map 5: Bishop Lonsdale Primary School Site (via Google Earth)

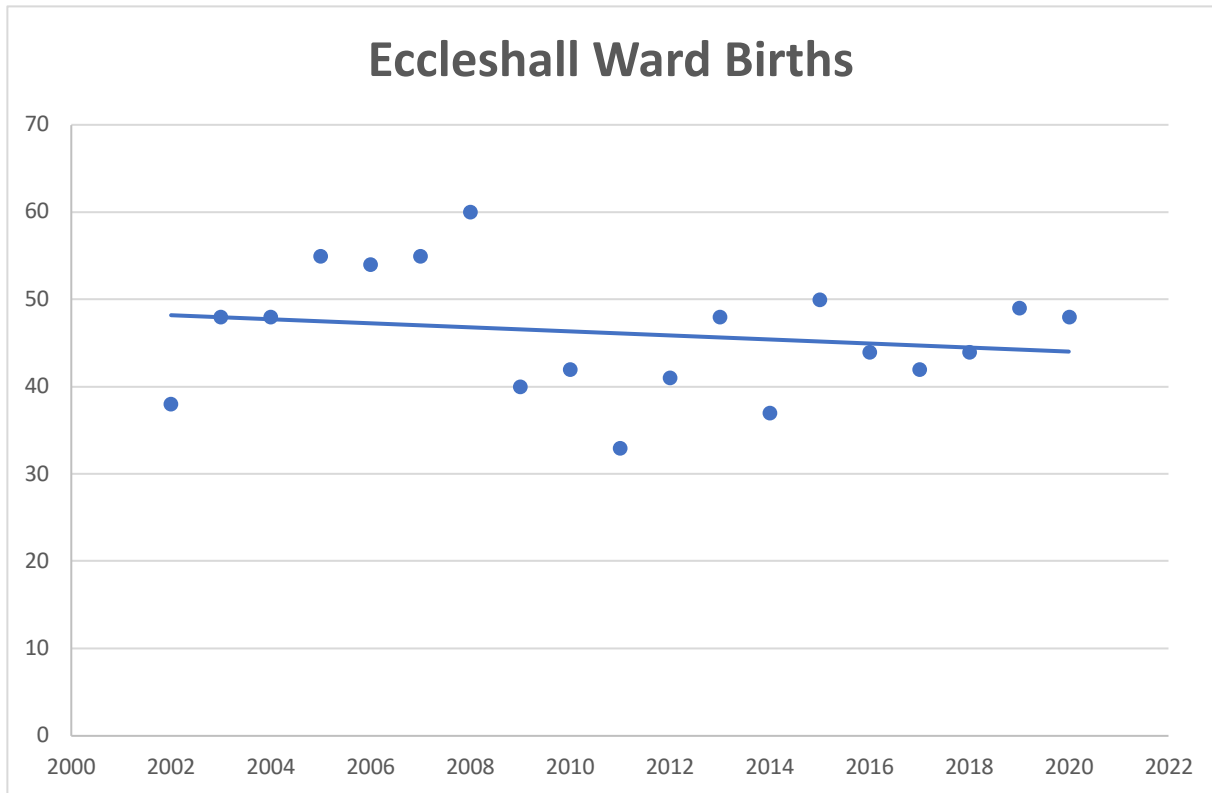
Therefore, whilst the school has expanded to 1.5FE, it could potentially go to 2FE, but it is likely that the Business Case did not justify it. The DfE supports the expansion of popular schools, so it would make sense for the school to grow on its site further if required

When looking at the area that the school serves, it accommodates pupils predominantly from Eccleshall, with a small number from neighbouring Offleyhay, and Norton Bridge areas:



Map 6: Bishop Lonsdale CofE Primary School Catchment Area Heat Map (via schoolguide)

When looking at birth numbers in the Ward, they have been relatively stable in the previous years, and if anything, are falling as a trend, which does not suggest that the school will struggle in coming years for places based on historic trends:



Graph 1: Ward Births

Turning now to the projections produced by SCC: Bishop Lonsdale C of E Primary School is grouped with five additional schools to form the Stafford Rural 1 Primary Planning Area. The schools have a combined capacity of 910 pupil places (1,015 when you take in to account the growth in Bishop Lonsdale Primary Academy):

LA Name	School Name	School Places	Pupil on Roll	Primary Capacity	Secondary Capacity
Staffordshire	Bishop Lonsdale Church of England Primary Academy	210	226	210	0
Staffordshire	Woodseaves CE Primary Academy	105	87	105	0
Staffordshire	Haughton St Giles CofE Primary Academy	105	116	105	0
Staffordshire	All Saints CofE (VC) Primary School	70	57	70	0
Staffordshire	Gnosall St Lawrence Coe Primary Academy	315	277	315	0
Staffordshire	Church Eaton Primary School	105	72	105	0

Table 5: Stafford Rural 1 Primary Planning Area Schools

In the 2020/21 academic year, the schools had a combined roll of 835, which equated to 75 spare places, or 180 when you consider the expansion of the Eccleshall School. The roll is expected to grow by 61 pupils by the 2025/26 academic year based on pupils in the system, meaning that there is still forecast to be surplus capacity.

LA
LA Name Staffordshire
Primary Change 61

Area Code 8606001
Area Name Stafford Rural 1 Primary

Year Group	Primary total
Actual 2021	835
Forecast 21-22	830
Forecast 22-23	840
Forecast 23-24	877
Forecast 24-25	881
Forecast 25-26	896

Table 6: SCC SCAP 2021 Forecasts

To summarise: The one Eccleshall based school – Bishop Lonsdale C of E Primary School – is popular and full in some of its Year Groups. The school has expanded, and now has spare capacity far exceeding the child yield of this development. The school is located on a site that, from a desktop assessment, looks ideally placed to grow further if necessary. On that basis, there is no Primary Education related reason why this development cannot commence.

Secondary Education

There are no state funded, independent, non-selective schools accommodating secondary school aged pupils within a three-mile radius of this development site. However, there is one school that serves Eccleshall that is beyond this parameter – Sir Graham Balfour School. This school is within the SCC administrative area, within the Stafford Secondary Planning Area.

The location of the school in relation to the development site can be seen below in Map 7:



Map 7: Secondary School in relation to the development site

The latest school roll data in the public domain can be seen in the Table below:

Secondary School Name	Postcode	LA Name	Distance (miles)	Capacity	PAN	NoR 7-11	Yr 7	Yr 8	Yr 9	Yr 10	Yr 11	Post 16
Sir Graham Balfour School	ST16 1NR	Staffordshire	6	925	180	853	155	172	182	174	170	101
TOTAL				925	180	853	155	172	182	174	170	101
Surplus							25	8	-2	6	10	
Available Surplus %							14%	4%	-1%	3%	6%	

Table 7: School Roll Data (January 2022)

PAN = Planned Admission Number; NoR = Number on Roll

Sir Graham Balfour School is a 6FE Secondary School approximately 6 miles walking distance from the development site. Due to the distance, SCC provides school transport:

Sir Graham Balfour High School - Service 432, Eccleshall, Chaserider

The wearing of a face covering is highly recommended on this service.

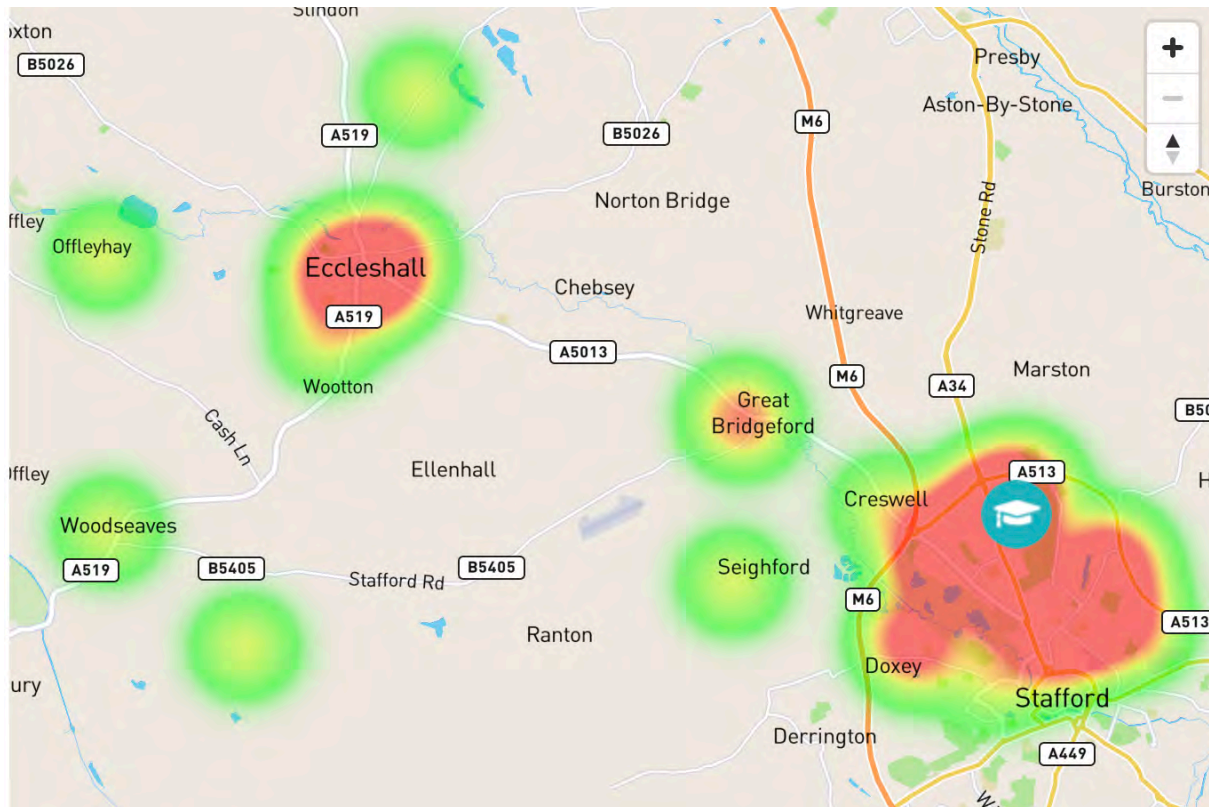
Timetable from September 2022

Schoolbound - Eccleshall, Castle Street, Stafford Street, A5013 Stafford Road, Eccleshall Road, Beaconside, Parkside Avenue, Beaconside, Stone Road.

Homebound - Stafford, Stone Road, Beaconside, Parkside Avenue, Beaconside, Eccleshall, A5013 Stafford Road, Stafford Street, Eccleshall, Castle Street.

Sir Graham Balfour School, as of the previous academic year, was full in only one Year Group, with the highest number of spare places in Year 7 (the transition Year Group)

The school draws pupils from Eccleshall and the surrounding settlements, Great Bridgeford, and north/north west Stafford, as shown in the Map below:



Map 8: Sir Graham Balfour School Catchment Area Heat Map

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:

LA Name	School Name	School Places	Pupil on Roll	Primary Capacity	Secondary Capacity
Staffordshire	Walton High School	1326	1332	0	1326
Staffordshire	Sir Graham Balfour High School	925	957	0	925
Staffordshire	King Edward VI High School	984	628	0	984
Staffordshire	The Weston Road Academy	1017	1002	0	1017
Staffordshire	Blessed William Howard Catholic School	1065	883	0	1065
Staffordshire	Stafford Manor High School	614	399	0	614

Table 8: Stafford Secondary Planning Area Schools

In the 2020/21 academic year, the schools had a combined roll of 5,211 pupils, which was 720 spare places. However, SCC forecast growth in Stafford of 714 additional pupils by 2027/28, meaning that the schools will be full. This is based on pupils that they already know of that are in the system, and does not account for new pupils from housing developments in Stafford, such as this one:

LA	Area Code 8606010
LA Name Staffordshire	Area Name Stafford Secondary
Secondary Change 714	

Year Group	Secondary total
Actual 2021	5211
Forecast 21-22	5360
Forecast 22-23	5516
Forecast 23-24	5603
Forecast 24-25	5736
Forecast 25-26	5817
Forecast 26-27	5871
Forecast 27-28	5925

Table 9: SCC SCAP 2021 Forecasts

SCC are well aware of the need for new secondary school provision. They state on their website⁴:

⁴ <https://www.staffordshire.gov.uk/Education/Schoolsandcolleges/PlanningSchoolPlaces/Stafford.aspx#Stafford>

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.

It is understood that SCC plan to build a 5FE (750 pupils in years 7-11) secondary school. It is also understood that SCC do not currently have a site secured to deliver this provision. In the meantime, additional provision will be provided via expansion projects.

On the basis of the rising rolls and the fact that the nearest school to the development is predominantly full, it would not be unreasonable for SCC to request planning obligations towards the additional provision commensurate to the child yield. However, it is clear that there is no Secondary Education related reason for this development not to commence, as expansions and new provision is planned by SCC to accommodate the growing area.

Early Years

Under the Childcare Act 2006, local authorities have specific duties to secure:

- Sufficient and suitable childcare places to enable parents to work, or to undertake education or training which could lead to employment;
- Sufficient and suitable early years places to meet predicted demand; and
- Free Early Years provision for all 3 and 4-year olds (and more recently the 40% most vulnerable 2-year olds) of 15 hours per week 38 weeks per year.

The Childcare Act 2016 includes an extension to the current entitlement and, from September 2017, provides an additional 15 hours (per week 38 weeks per year) of free childcare for 3 and 4-year old children from working families who meet the following criteria:

- Both parents are working (or the sole parent is working in a lone parent family); and
- Each parent earns, on average, a weekly minimum equivalent to 16 hours at national minimum wage and less than £100,000 per year.

SEN

The DfE states in their latest PPG on securing education planning obligations (November 2019):

We advise you to seek developer contributions for expansions required to sixth form and special educational needs and disabilities (SEN) provision, commensurate with the need arising from the development.

This demonstrates that the best practice guidance supports the requesting of SEN contributions if they are needed.

Government statistics suggest that in 2022 4% of children in the UK have an EHC plan/Statement of SEN (up from 3.7% in 2021)⁵. 12.6% of the UK's school age child population has some form of SEN but no EHC plan. Nationally, there is not sufficient SEN provision to accommodate the demand, which is growing.

There are not expected to be any pupils with Primary SEN on this development site, although it may be that SCC request funding towards one Secondary SEN pupil. This would be acceptable.

Summary

SCC may be justified in requesting planning obligations towards additional school provision. There is no education-related reason why this development cannot commence. Additionally, Education capacity is not a reason for the site not being allocated, and there are clear options available to SCC to manage school places via Section 106 planning obligation funding.

Kind regards,



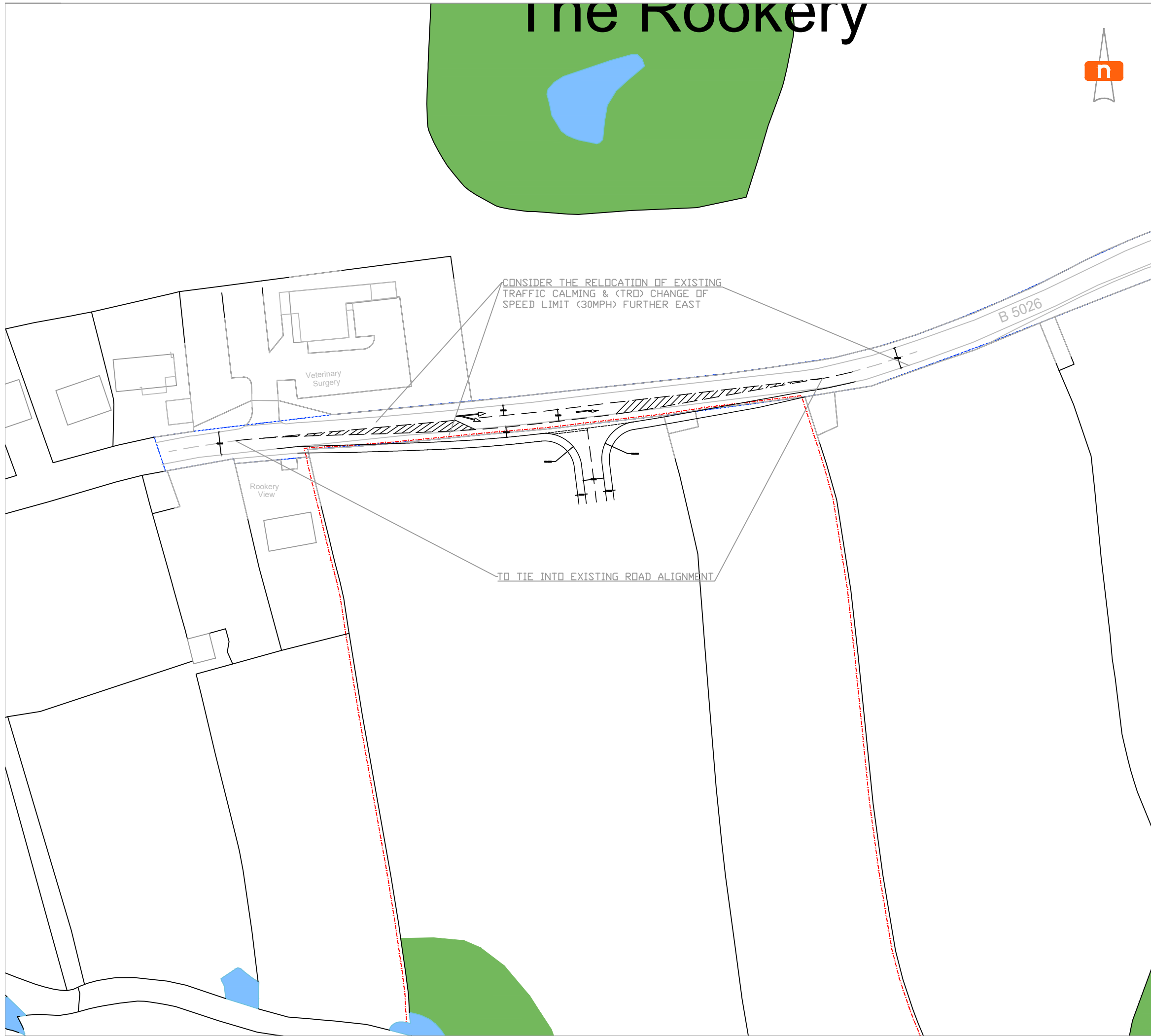
Ben Hunter

Associate Director – Education and Social Infrastructure

EFM

⁵ <https://explore-education-statistics.service.gov.uk/find-statistics/special-educational-needs-in-england>

Appendix C Site Access



- NOTE:
1. THIS DRAWING IS BASED UPON DRAWING NUMBER 31724 - BM-M-01 - Site Boundary Plan BY BARTON WILLMORE.
 2. THIS DRAWING IS BASED UPON THE ORDNANCE SURVEY'S (1:250) MAP WITH PERMISSION OF THE CONTROLLER OF HER MAJESTY'S STATIONERY OFFICE, CROWN COPYRIGHT RESERVED.
 3. THIS DRAWING IS INDICATIVE AND SUBJECT TO DISCUSSIONS WITH LOCAL & NATIONAL HIGHWAY AUTHORITIES. THIS DESIGN IS ALSO SUBJECT TO CONFIRMATION OF LAND OWNERSHIP, TOPOGRAPHY, LOCATION OF STATUTORY SERVICES, DETAILED DESIGN AND TRAFFIC MODELLING.
 4. ROAD MARKINGS & TRAFFIC SIGNS ARE TO BE IN ACCORDANCE WITH 'THE TRAFFIC SIGNS REGULATIONS AND GENERAL DIRECTIONS 2016'
 5. HIGHWAY BOUNDARY INFORMATION HAS BEEN PROVIDED BY STAFFORDSHIRE COUNTY COUNCIL (SCC 2020) AND HAS BEEN TRANSCRIBED BY MODE ONTO AN ORDNANCE SURVEY. MODE ACCEPTS NO LIABILITY FOR THE ACCURACY OF THE DATA PROVIDED AND THE HIGHWAY BOUNDARY INFORMATION SHOWN IS SUBJECT TO CHECKS BY A LICENSED CONVEYANCER.
 6. DO NOT SCALE FROM THIS DRAWING WORK FROM FIGURED DIMENSIONS ONLY.
 7. ALL DIMENSIONS ARE SHOWN IN METRES UNLESS NOTED OTHERWISE.

KEY:

- - - SITE BOUNDARY
- - - HIGHWAY BOUNDARY (TRANSCRIBED HIGHWAY BOUNDARY BASED ON SCC)

-	-	-
-	08.12.2022	INITIAL ISSUE
REV	DATE	REMARKS

CLIENT

BELLWAY HOMES

JOB TITLE: **STONE ROAD, ECCLESNALL**

DRAWING TITLE: **INDICATIVE GHOST TURN ACCESS**

DRAWING NO.: **J32-4892-PS-002**

DRAWN	ESP	CHECKED	ALF
CREATED	DEC '22	SCALE	1:1000 @A3



Stafford Borough Local Plan 2020-2040: Preferred Options Consultation Form

How we will use your details

All representations received to the Stafford Borough Local Plan 2020-2040 Preferred Options consultation document will be included in a schedule and made publicly available once the consultation has closed.

We will consider all representations received, using them to inform the next stage of the process for the Stafford Borough Local Plan 2020-2040.

Comments cannot be treated as confidential. Your personal information, such as your postal and email address will not be published and signatures will be redacted, but your name and organisation will be made available. Comments will be made public and, because they are used to inform the development of policy, will not be able to be withdrawn once they have been processed and published. In addition, we will use your personal information to send you information on the Local Plan and associated planning policy matters.

Except where the law obliges or allows us, we will not further share your data with any external bodies or persons or with other departments within the Council.

We believe you should always know what data we collect from you and how we use it, and that you should have meaningful control over both. As part of our ongoing commitment to transparency, and in relation to current data protection legislation, we have updated our Privacy Policy.

We are the data controller and you can find information about how we handle your personal data by visiting www.staffordbc.gov.uk/local-plan-consultation-representations-how-we-use-your-personal-information and if you have any queries or would like to unsubscribe from receiving information then please contact strategicplanningconsultations@staffordbc.gov.uk.

By completing this consultation form you are agreeing to the use of your personal information in the way set out above.

Local Plan 2020-2040: Summary

The Local Plan sets out where new development can take place in the future across Stafford Borough and contains policies that the Council uses to decide planning applications. The new Local Plan will cover the years 2020 to 2040.

We are currently at the Preferred Options stage in the plan making process, with the Local Plan 2020-2040 due to be adopted in October 2024.

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): Sean Nicholson

Email (required): 

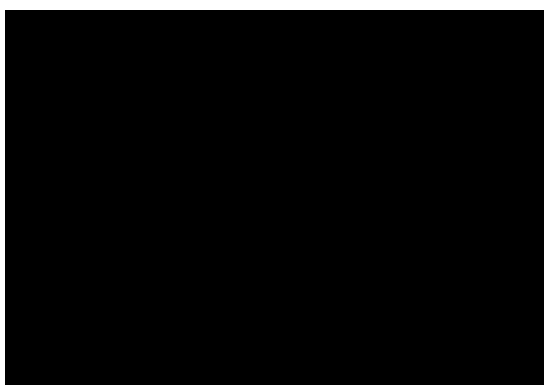
Tick the box that is relevant to you (required):

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

Organisation or Company Name (if applicable): WSP Environment and Infrastructure Solutions UK Ltd on behalf of Bellway Homes Ltd in respect of Land to the South Stone Road, Eccleshall

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
- **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:

Please see attached response.

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:

Please see attached response.

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:

Please see attached response.

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:

Please see response attached.

Policy 12 of the Local Plan should be updated to reflect additional allocations required to meet the shortfall identified from Meecebrook and provide a more meaningful contribution towards meeting the adjacent HMAs' needs. These allocations should be in the larger settlements and should include Bellways land to the South Stone Road, Eccleshall.

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:

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

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:

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:

Please see response attached.

There is a need for additional evidence in relation to Meecebrook, including the proposed railway station but also other fundamental issues relating to infrastructure, delivery and viability.

The site selection process should adopt an approach based on the position of settlements in the hierarchy, consideration of local housing need, informed by a housing need assessment by settlement, the planning merits of each of the shortlisted sites and consideration of whether or not their allocation is necessary (consistent with Paragraph 23 of the NPPF).

There is a need for additional work in relation to unmet needs arising from neighbouring areas.

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.

Please see response attached.

Going forward the consideration of the Land to the South Stone Road, Eccleshall, should be on the basis of the site boundary previously provided to the Council.

Eccleshall is a highly sustainable settlement that is clearly suitable for further development. The site is in a sustainable location being walkable to key services and facilities, there are no technical or environmental constraints to development that cannot be addressed through a sensitive, carefully planned masterplan. The Site is available, the promoter, Bellway is a housebuilder committed to bringing the site forward in the short term. This will assist the Council through delivery of market and affordable homes in a highly sustainable settlement. The site should therefore be allocated in the Local Plan.

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.



STONE ROAD
ECCLESHALL

MARCH 2021

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Eccleshall Vision Document 14

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Date: 24.03.2021 / Status: Draft / Rev: 14A
Author: DW / Checked by: LH



INTRODUCTION

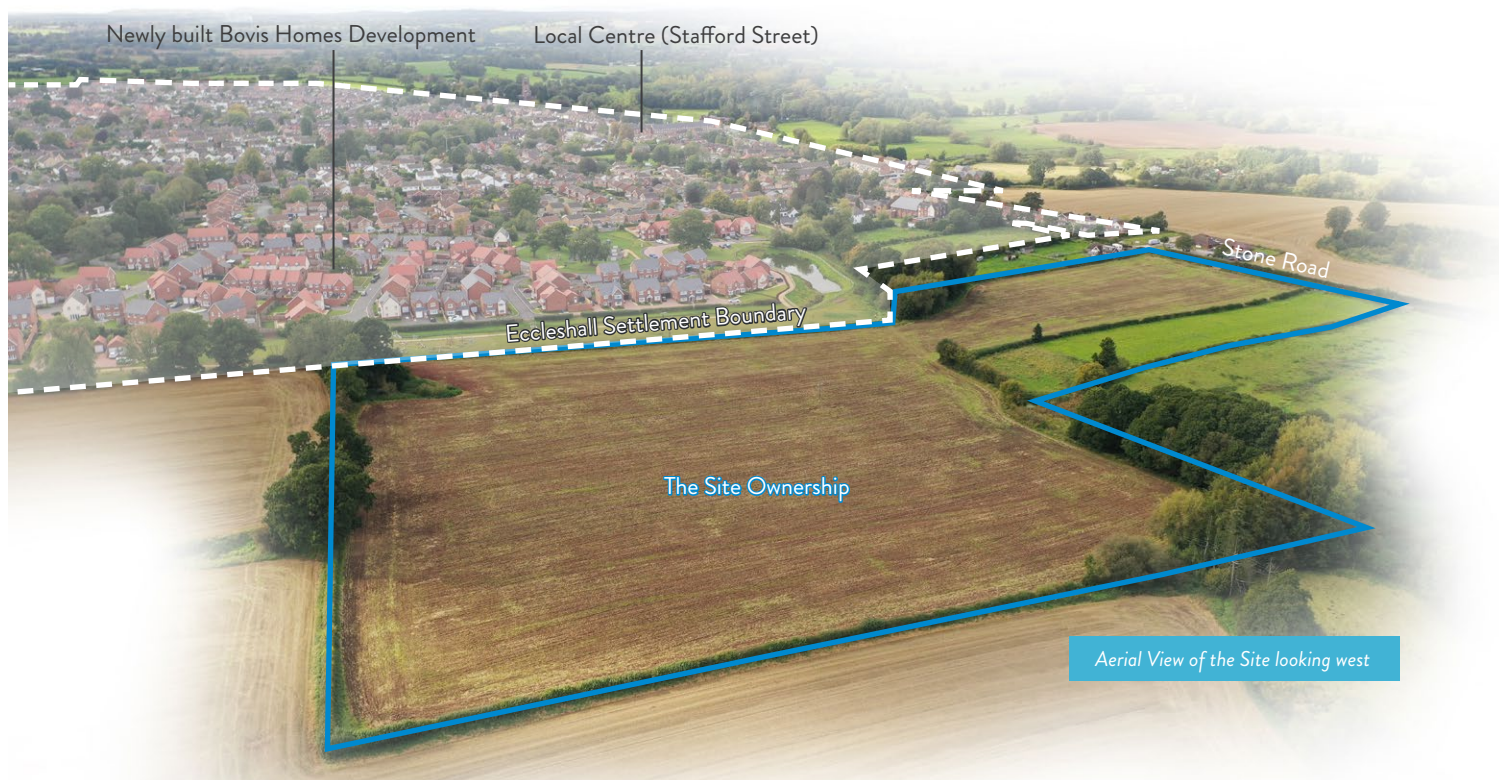
Stafford Borough Council is preparing a new local plan to deliver new homes, jobs and infrastructure through to 2040, looking at options for where new development might be needed. In parallel, there is a national priority to boost the supply and delivery of new homes.

As the 4th largest UK housebuilder with a strong track record in the delivery of high-quality development Bellway is keen to help. This report therefore presents a Vision for a new sustainable development opportunity at Eccleshall to inform further discussions with the Council, Eccleshall Parish Council and local community. Bellway is keen to explore what benefits and investment could be realised alongside the provision of new market and affordable homes.

Eccleshall is a highly sustainable location, designated as a Key Service Village given its range of community facilities, employment opportunities and local retail centre. It is well connected to Stafford by public transport.

This Vision document sets out the Site's opportunities and an emerging masterplan concept to support further discussions and engagement. It has been informed by initial technical work assessing accessibility and transport, ecology and landscape.

Bellway's Site opportunity is located to the north east of the town, south of Stone Road, just a 5-10 minute walk to the local centre and the range of services and facilities this provides. It adjoins and can complement a new residential neighbourhood of 130 homes which is now nearing completion.



PLANNING FOR SUSTAINABLE DEVELOPMENT

Eccleshall as a sustainable location for new development

Stafford Borough Council (SBC)'s Local Plan (Part 1, adopted June 2014) recognises the unique benefits of Eccleshall as a Key Service Village:

“6.28 Eccleshall has a historic centre designated by a Conservation Area, **with a significant level of services and facilities for a relatively small population, as well as having the Raleigh Hall Recognised Industrial Estate** nearby.”

It is the only Key Service Village to contain a Local Service Centre, as defined under Policy E8 Town, Local and Other Centres:

“Eccleshall Local Centre acts as a key service centre providing key services and facilities to the local community and an extensive rural hinterland, and includes specialist shops.” (extract from Policy E8, page 80 of the adopted Local Plan).

Eccleshall therefore has strong status as a sustainable location for development in the adopted Local Plan.



Sustainability and deliverability of land south of Stone Road

Bellway Homes has identified the opportunity for a 6.8-hectare (ha) site south of Stone Road to the north east of Eccleshall. The precedent for development in this part of Eccleshall is well-established given the adjoining consent for 130 homes which is being built out. The Site is 700 metres from the High Street, accessible by walking and cycling, with opportunities to further improve connectivity as part of a future development scheme, whilst creating a new gateway into the town. The scheme can also tie in with existing public transport provision on Castle Street providing links into Stafford and beyond via the number 14 bus route which runs regularly with a service once every two hours.

There are no policies or statutory designations affecting the Site and limited technical and environmental constraints as explained in the section opposite. It is deliverable in terms of the NPPF, being available, suitable and achievable, and in its role in the delivery of a sustainable spatial strategy. Bellway Homes has presented this case in representations submitted to the Council on its Issues and Options consultation in April 2020.

The table overleaf sets out how development on land south of Stone Road provides the opportunity to address the emerging plan's strategic priorities, as well as responding to the key issues identified by Eccleshall Parish Council in the ENP. It is these opportunities that underpin our Vision and emerging masterplan presented in this document.

Bringing forward the Site for residential development would therefore address local priorities and align with the objectives of the NPPF in terms of reinforcing sustainable patterns of development, meeting the needs of rural communities and helping to boost the supply of homes on a deliverable site being taken forward by a 5* housebuilder.

Emerging Plan Strategic Priorities	Contribution of Eccleshall & Land South of Stone Road
The emerging local plan sets out the following strategic priorities for the Council's Vision for Stafford Borough:	A new neighbourhood at north east Eccleshall on land south of Stone Road will support the Council in achieving the Vision set out in its emerging local plan:
a. Retain and enhance its high-quality unique character made up of the County Town of Stafford, the market town of Stone and extensive rural area containing smaller towns and historic villages;	A high-quality scheme can be delivered, drawing on local character and vernacular, as demonstrated through our masterplan and vision for the Site.
b. Provide high quality designed developments including recreation, open space and sport provision;	Provision of open space and informal recreational opportunities is central to our proposals, with circa 40% of the Site likely to form green spaces, accessible to all.
c. A range of housing types and tenures to meet the needs of the Borough, including for the ageing population, affordable housing and provision for gypsies and travellers;	Bellway can provide a mix of homes and tenures, including affordable homes, in response to local needs.
d. Reduce the need to travel, through the provision of increased services and facilities in key locations to sustain the surrounding rural areas;	Eccleshall is rightly recognised as a sustainable location for development given its status as a Key Service Village (and only KSV with a Local Centre for retail) and public transport links to Stafford. The scheme will therefore have high levels of accessibility to local services and facilities, with the opportunity to further support and enhance provision through S106/CIL.
e. Address issues of climate change, including a reduction of carbon emissions and flood risk with sensitively delivered renewable energy schemes;	The Site is not in an area at risk of flooding and will be built to prevailing building regulations requiring high levels of energy efficiency and sustainability.
f. Improve accessibility to services and facilities by providing safe, attractive and convenient sustainable connections from and to new developments;	The Site has high levels of accessibility to services and facilities, particularly to the High Street, via pedestrian/cycle links, with wider enhancements and improvements that can be delivered alongside development, benefiting Eccleshall as a whole.
g. Protect, conserve and enhance to provide an exceptionally high quality of environmental, historic and landscape character;	The scheme can support new habitat provision and deliver a new enhanced landscape boundary and open spaces to the north east of Eccleshall.
h. Community supported Neighbourhood Plans in place;	The scheme can respond to local priorities established through the Eccleshall Neighbourhood plan (below).
i. Deliver new development, where possible through the re-use of brownfield land and land not of high environmental value, in sustainable locations at Stafford, Stone and the Borough's selected villages.	Land south of Stone Road presents an opportunity to deliver new homes in an area free of significant environmental constraints in a highly sustainable location.

Site opportunities to address the emerging plan's strategic priorities

THE VISION

A significant opportunity exists for Stone Road, Eccleshall to come forward for a sustainable, residential development. Our Vision for the Site includes:



New high-quality homes responsive to the local character and context on the eastern edge of Eccleshall with a variety of types and tenures to suit the local need.



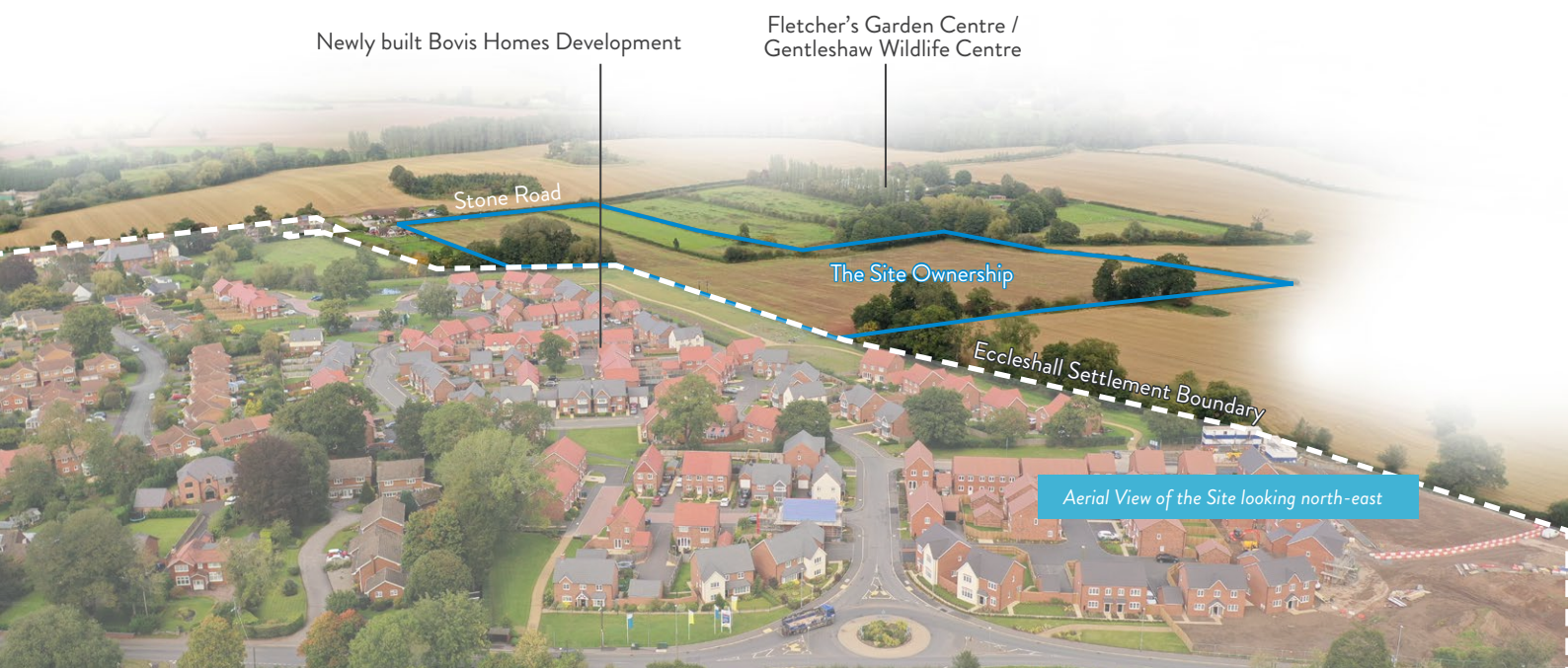
Potential opportunity for the creation of a new accessible green space on the eastern edge of the development to support community use, recreational activity and biodiversity enhancement, benefiting both the proposed and existing communities.

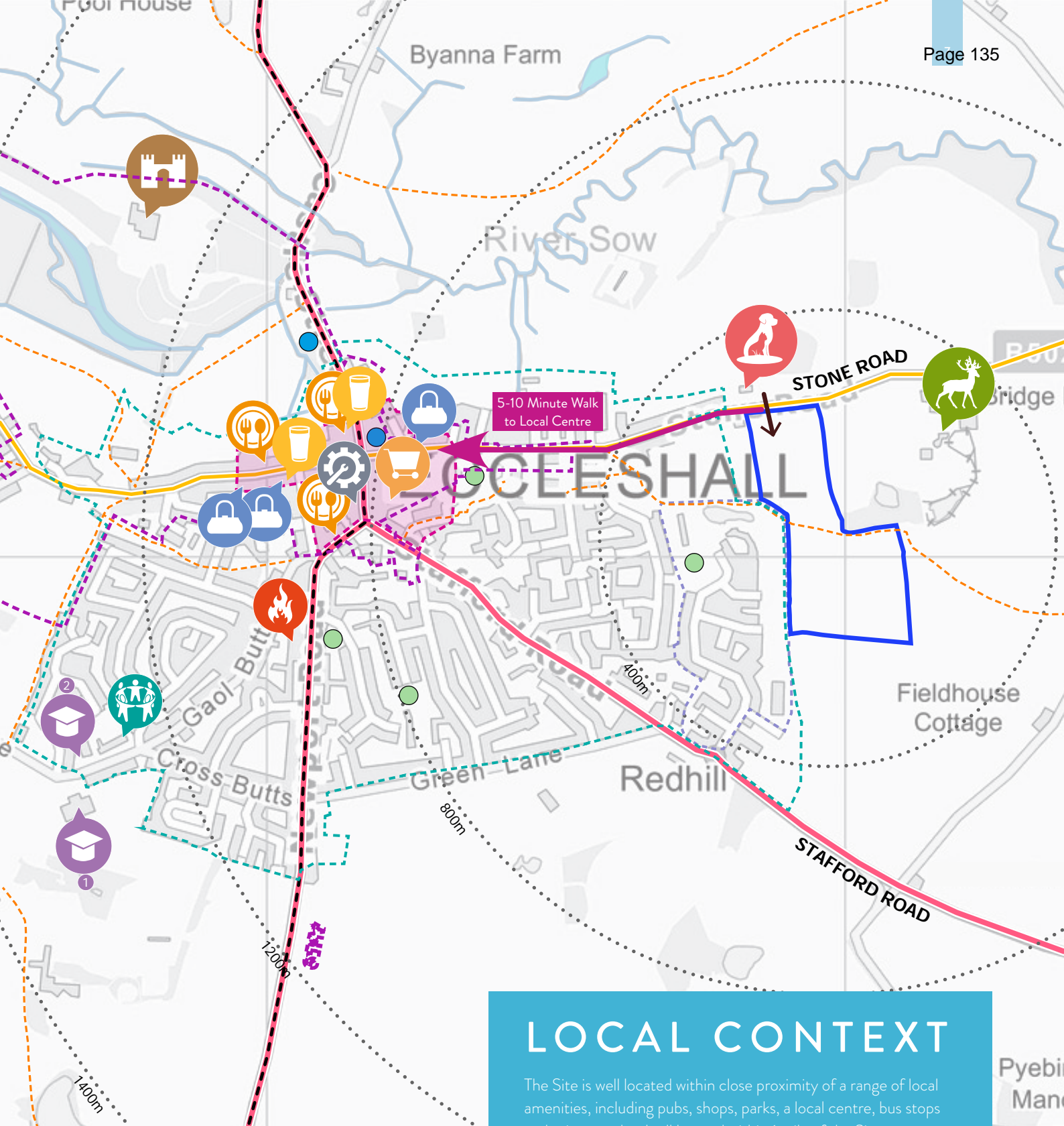


New and retained landscaping to inform new green corridors, public open space and landscaped site boundaries and buffers.



Well connected to local facilities and services within walking and cycling distance of Eccleshall town centre. The proposals incorporate the retention and enhancement of an existing Public Right of Way running across the Site, improving connectivity between the Site, Eccleshall and surrounding countryside.





Local Context Plan

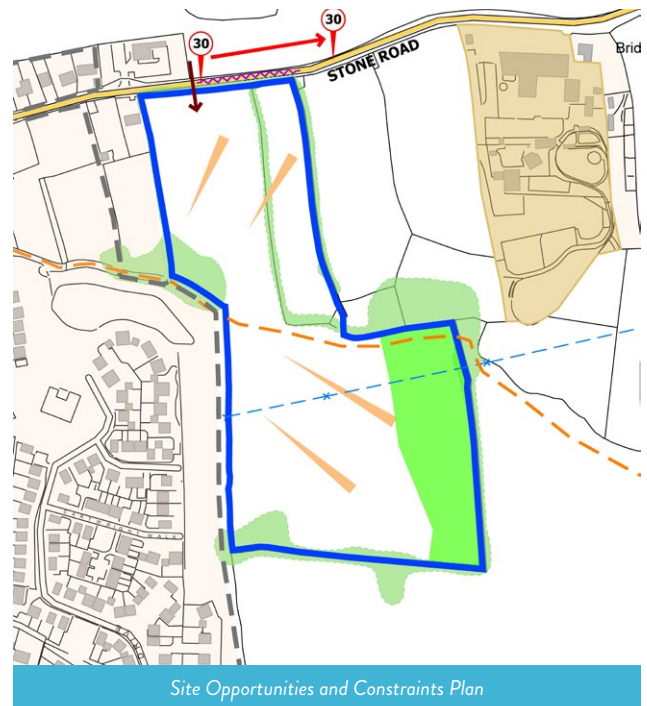
- | | | | |
|-------------------------------|---------------------|-----------------------------------|---|
| Site Ownership Boundary | A Roads | Gentleshaw Wildlife Centre | Pubs and Restaurants |
| Proposed Site Access | Local and B Roads | Eccleshall Castle | The Garage, Eccleshall |
| Local Centre | Bus Route 14 | Shires Veterinary Practice | Schools
1. Bishop Lonsdale C of E Primary School
2. Eccleshall Pre-School |
| Conservation Area | Settlement Boundary | The Co-operative Food, Eccleshall | Restaurants and Take Aways |
| Newly Constructed Development | Bus Stops | Eccleshall Community Fire Station | Local Shops |
| Walking Distances | Local Parks | Eccleshall Community Centre | |
| Public Rights of Way | River Sow | | |














OPPORTUNITIES AND CONSTRAINTS

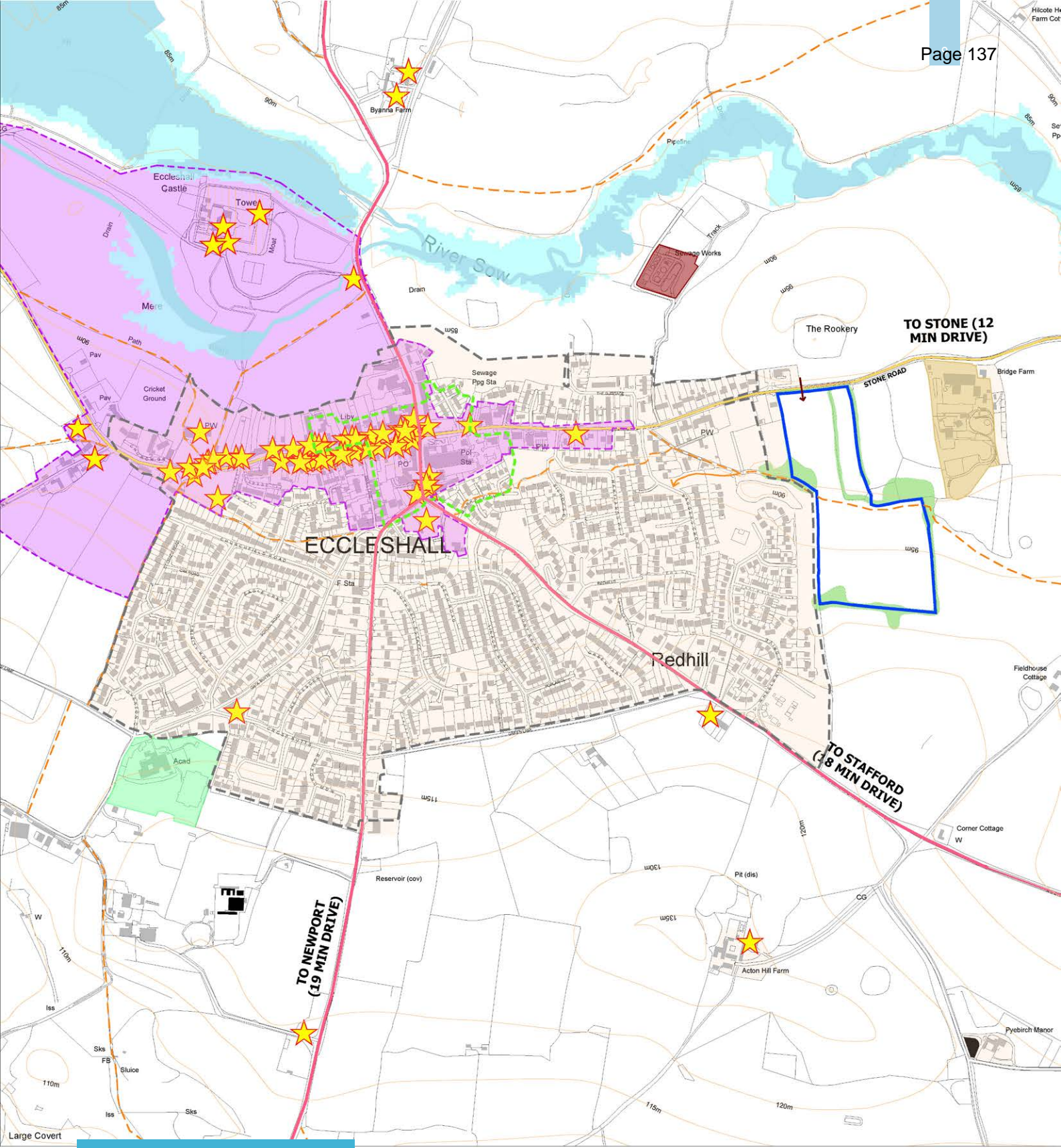
The Site provides a number of opportunities, set out as follows, and we are keen to discuss these with the Council and Parish Council to see what other benefits Bellway can help to realise.

- The ability to deliver new market and affordable homes (up to 40%) in a highly sustainable location, within a Key Service Village and just a 5-10 minute walk to the local retail centre off Stafford Street via Stone Road or the existing PRoW which link the Site with the heart of Eccleshall.
- To meet local needs in a location which avoids the flood risk areas and heritage-constrained areas to the north and west of Eccleshall.
- To retain and enhance existing landscape features and the PRoW, and provide enhanced access to the countryside within an attractive green setting. In particular, there are opportunities for new open space to the south and east of the Site comprising informal recreation, children's play, sustainable drainage and new habitats and planting, also providing a new landscaped boundary for the east of Eccleshall.
- To achieve a single point of vehicular access via priority junction off Stone Road.
- To look towards and complement the adjoining neighbourhood which is now nearing completion as part of a well-planned, integrated and comprehensive approach.
- To secure investment in and improvements to local infrastructure as required.
- Work with the existing topography on the Site to utilise the gentle fall to guide the sustainable urban drainage.

As explained above there are no significant technical or environmental constraints to development. The existing overhead lines can easily be diverted / under-grounded as part of the scheme.



 Site Ownership Boundary	 Wildlife Centre
 Site Access	 Recreational Green Space and Biodiversity Enhancement
 Settlement Boundary	 Bovis Homes Development
 B Roads	 Proposed Change to Existing Speed Reduction Change Location
 Public Rights of Way	 New Gateway Features
 Overhead Lines	
 Existing Hedgerows and Trees	
 Site Falls	



Contextual Opportunities and Constraints Plan

- Site Ownership Boundary
- ➔ Site Access
- A Road
- B Roads
- - - Public Rights of Way
- ➔ Link to Badgers Croft
- - - Local Centre
- Site Contours
- ★ Listed Buildings
- Bishop Lonsdale C of E Primary School
- Wildlife Centre
- - - Conservation Area
- Sewage Treatment Plant
- Flood Zone 2
- Flood Zone 3
- ||| Scheduled Ancient Monument
- Existing Hedgerows and Trees
- - - Settlement Boundary

TECHNICAL AND ENVIRONMENTAL CONSIDERATIONS

The following is a summary of some technical considerations which have been identified and considered in the design process following individual assessments in each area by a professional consultant.

Accessibility

As explained in the previous sections, Eccleshall is a sustainable location for development. The town's sustainability is already recognised in the adopted plan and through the grant of permission for new homes on the adjoining site. The Site itself is in a sustainable and accessible location, with clear opportunities to promote walking, cycling and public transport given the Site's proximity to Stafford Street (just a 5-10 minute walk) and frequent bus services to Stafford (service 14). There are two main links to the heart of Eccleshall, either via Stone Road or via the existing PRoW (E17) which new residents will be able to use.

Vehicular access can be achieved off Stone Road via a ghost island right turn junction provided at the existing farm access. Stone Road is subject to a 30mph speed limit for approximately 60 metres of the southern site frontage. To the east of this point the national speed limit restriction applies. There is a clear opportunity to extend the 30mph speed limit to beyond the Site frontage relocating the speed limit signs, associated dragon's teeth and road markings to reinforce the speed limit change in this area. This would be complemented by new gateway features for those entering Eccleshall from the east.

Ecology

The number of ecological constraints identified at this Site is limited and is restricted to a fairly typical range of protected species issues and the usual need to retain woodland, trees and hedgerows, and protect/buffer the on-site ponds and off-site habitats, wherever possible. Arable land and semi-improved grazed grassland dominates the Site and are considered to be of low ecological value.

Opportunities will exist to create new habitats and provide other ecological enhancements alongside development. The proposals should seek to retain the more ecologically valuable on-site habitats as part of green infrastructure provision or open space to ensure these features are protected with a suitable green buffer.

New habitats and improved biodiversity can be delivered as part of new development, recognising that, at present the Site's ecological value is limited to the field margins given its arable use. As the proposals progress Bellway will undertake further survey work, in consultation with the county ecologist, to identify the specific habitats and enhancements that can be realised, and the extent of net gain that it will be possible to achieve as part of the scheme's extensive green space network.

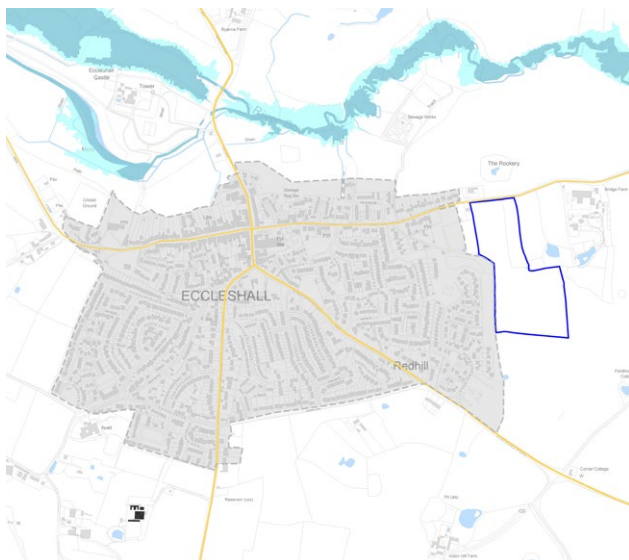
Landscape and Visual Considerations

The Site presents a clear opportunity to deliver homes in a part of Stafford Borough beyond the Cannock Chase AONB, with no landscape designations affecting the Site. It also avoids and reduces pressure on the more landscape sensitive parts of Eccleshall to the north west, west and south west (an area defined in SCC's Landscape Character Assessment as having the highest landscape sensitivity). Retention of existing landscape features (including trees and hedgerows) as far as possible and enhanced provision through new planting, particularly on the Site's eastern boundary, will create a longer-term boundary and help to visually contain the eastern edge of Eccleshall.

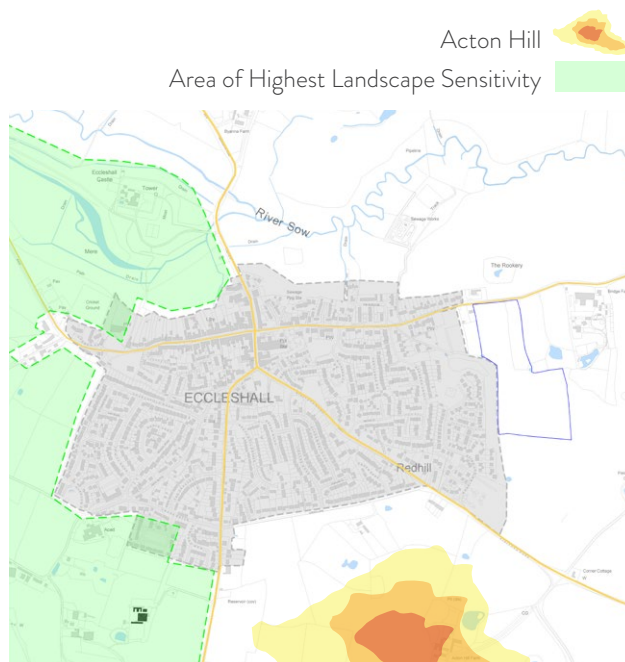
Development at the Site would be relatively well contained in views. The adjacent residential development to the west already exerts an urban influence over the southern and western parts of the Site. Therefore, the presence of additional residential development in this location would not be incongruous with the character of adjacent areas.

Sustainable Drainage

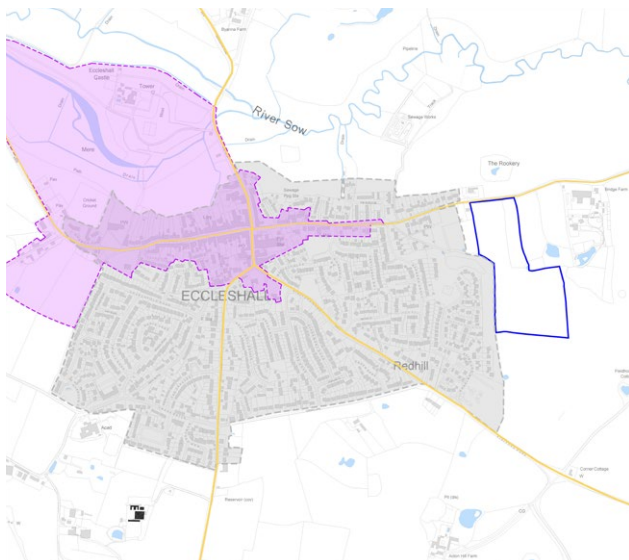
The Site naturally drains towards the middle of the Site, falling more towards the eastern edge. Sustainable Drainage features will be incorporated within a central green-blue corridor approximately following the path of the Public Right of Way through the centre of the Site.



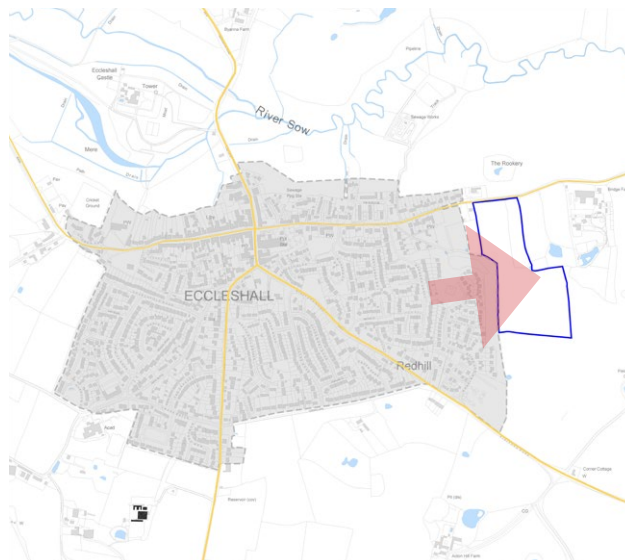
Flooding constraints north of Eccleshall



Landscape sensitive areas north west, west and south west of Eccleshall (shaded green).



Heritage constraints north / west of Eccleshall



No significant constraints to the east of Eccleshall, presenting a suitable opportunity for the future growth of the settlement.

Settlement Development Constraints Plans

These plans summarise the key environmental and technical constraints to the future potential growth of Eccleshall. We have identified that the natural direction for future growth for Eccleshall is towards the east where potential development is least constrained.

 Site Ownership Boundary

CONCEPT MASTERPLAN - OPTION 1

The initial concept masterplan for The Site is presented opposite. This is the first of two potential options informed by the initial site assessment work and creates a proposal with the following benefits:



Provision of approximately 95 high quality new homes (2.7 hectares (ha) of residential use at a density of 35 dph).



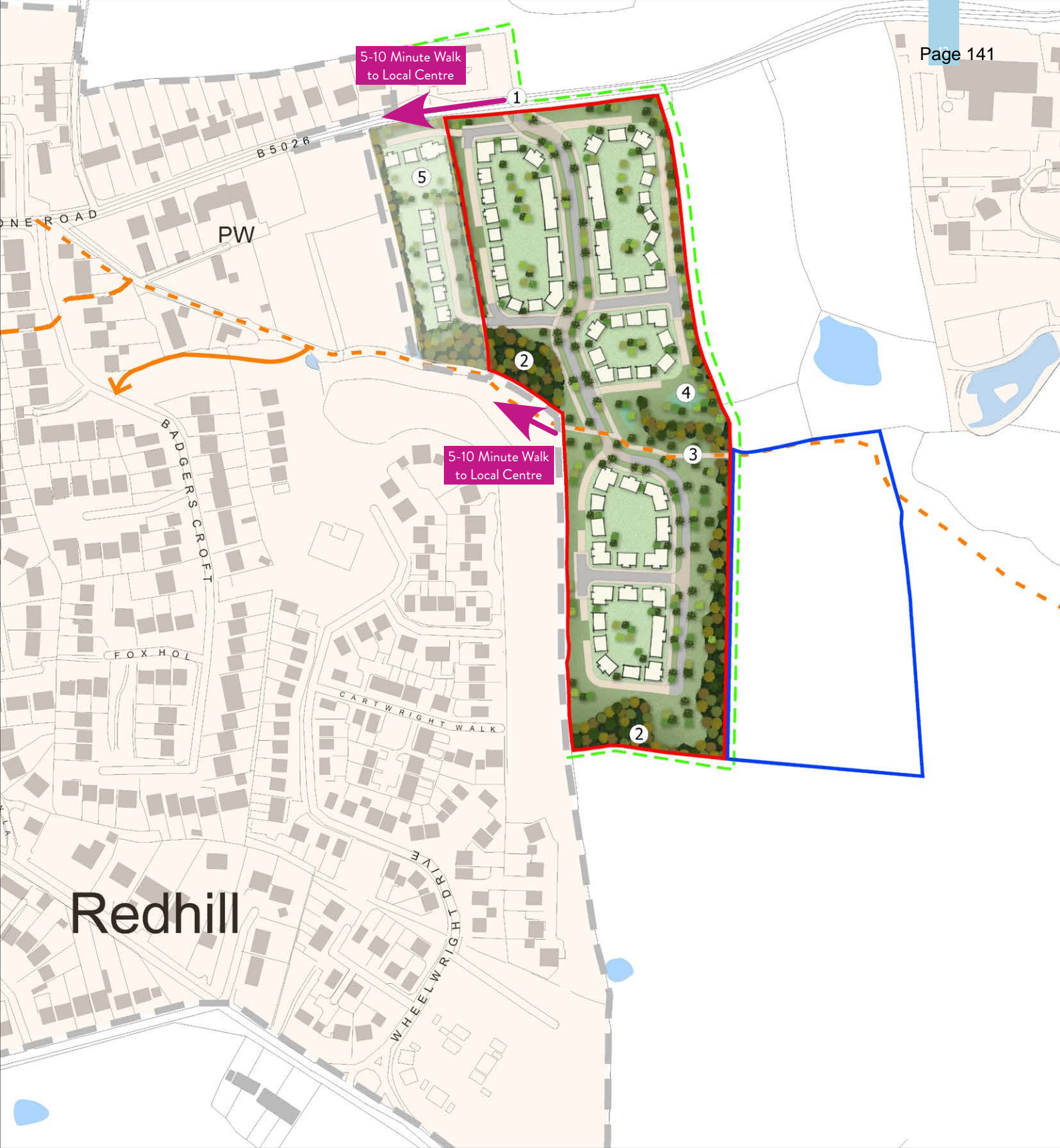
A vibrant new sustainable community well connected to local facilities and services within walking and cycling distance of Eccleshall's local centre. The proposals incorporate the retention and enhancement of an existing PRoW running across the Site, improving connectivity between the Site, Eccleshall and surrounding countryside.



New and retained landscaping to support new green corridors, public open space and landscaped site boundaries and buffers, enhancing the character of the development and new public open space whilst retaining the existing character of the surrounding countryside.



A legible development with a hierarchy of streets with a primary north south movement route connecting through the Site with secondary roads leading off from this and single-sided private drives reaching dwellings facing outwards from blocks providing an sensitive transition and an appropriate development edge.



Concept Masterplan

-  Site Boundary
-  Other Land in Bellway's Control
-  Link to Badgers Croft
-  Retained and Enhanced Public Footpath
-  Settlement Boundary
-  Primary Access
-  Primary Route
-  Residential Development Area

-  Public Open Space
-  Retained and Enhanced Landscape
-  Attenuation Area
-  Proposed Settlement Boundary

Numerical Key

-  1 Access
-  2 Retained and Enhanced Landscape Planting
-  3 Retained and Enhanced Footpath
-  4 Attenuation Areas
-  5 Potential Further Development

CONCEPT MASTERPLAN - OPTION 2

The initial concept masterplan for The Site is presented opposite. This second option increases the amount of residential development, extending further to the east but also presents the opportunity to provide additional benefits for the local community. This option has also been informed by the initial site assessment work and creates a proposal with the following benefits:



Provision of approximately 140 high quality new homes (4.1 hectares (ha) of residential use at a density of 35 dph).



A vibrant new sustainable community well connected to local facilities and services within walking and cycling distance of Eccleshall's local centre. The proposals incorporate the retention and enhancement of an existing PRoW running across the Site, improving connectivity between the Site, Eccleshall and surrounding countryside.



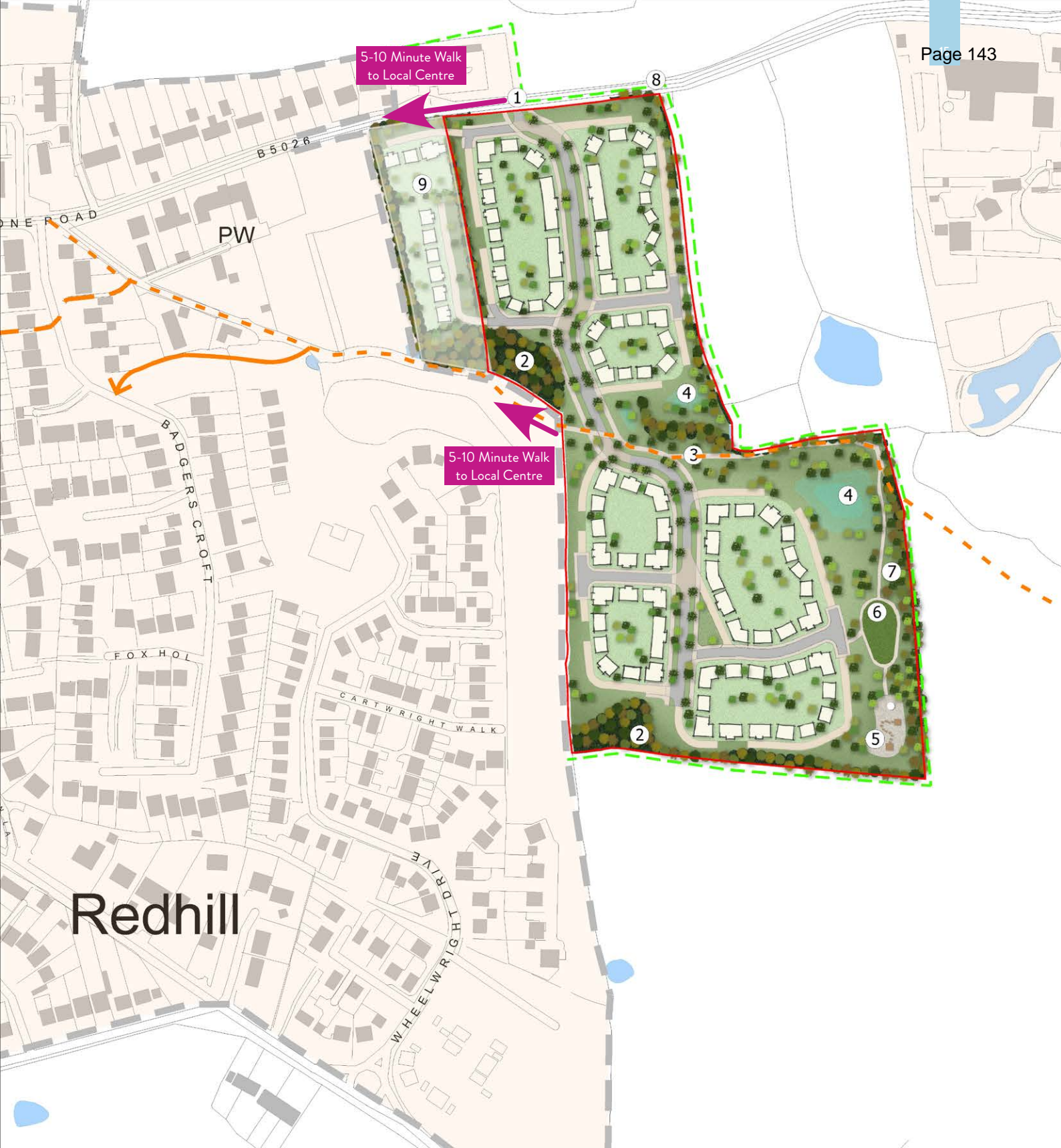
New and retained landscaping to support new green corridors, public open space and landscaped site boundaries and buffers, enhancing the character of the development and new public open space whilst retaining the existing character of the surrounding countryside.









A legible development with a hierarchy of streets with a primary north south movement route connecting through the Site with secondary roads leading off from this and single-sided private drives reaching dwellings facing outwards from blocks providing an sensitive transition and an appropriate development edge.







The proposals offers the opportunity for the creation of a new accessible green space on the eastern edge of the development to support community use, recreational activity and biodiversity enhancement.






Concept Masterplan

-  Site Boundary
-  Link to Badgers Croft
-  Settlement Boundary
-  Retained and Enhanced Public Footpath
-  Primary Access
-  Primary Route
-  Residential Development Area
-  Public Open Space

-  Retained and Enhanced Landscape
-  Attenuation Area
-  Play Areas
-  Proposed Settlement Boundary

Numerical Key

-  1 Access
-  2 Retained and Enhanced Landscape Planting
-  3 Retained and Enhanced Footpath

-  4 Attenuation Areas
-  5 Play Area
-  6 Focal Open Space
-  7 Strong Landscaped Boundary Including Habitats
-  8 Extension to 30mph and New Gateway Features
-  9 Potential Further Development

Summary

This document presents a clear Vision as to how Bellway Homes can contribute towards helping Stafford Borough deliver new homes through to 2040, presenting a suitable, available, achievable and deliverable site for allocation as part of the new Local Plan.

As well as the provision of market and affordable homes in a sustainable and walkable location, land south of Stone Road presents wider opportunities and benefits for Eccleshall. This Vision document is intended to inform a process of engagement with Stafford Borough Council, Eccleshall Parish Council and key stakeholders, who we are keen to meet with to discuss our proposals further.



Wider Concept Masterplan

The proposals and the wider development context. The Site is a logical and appropriate area for development within Eccleshall.

- Site Ownership Boundary
- - - Public Rights of Way
- - - Settlement Boundary
- - - Local Centre
- Roads

About Us

At Bellway our aim is not just to build new houses, it is to create attractive and sustainable communities that leave a positive legacy for residents and the wider society. Our commitment to this is demonstrated by being awarded the coveted five star housebuilder award by the House Builders Federation as a result of emphasis on build quality, customer care and health and safety.

Bellway recognise that successful developments must meet the needs of not just potential residents, but also of existing neighbouring communities. We therefore consult on new developments through tailored engagement with local communities and stakeholders, incorporating feedback into our plans to ensure local people have the opportunity to help shape developments within their community.

As the fourth largest housebuilder in the UK, Bellway are well placed to deliver much needed market and affordable homes to address the country's ongoing housing shortage. Since our beginning as a family business over 70 years ago, Bellway now operate from 22 trading divisions which are located in the main population centres in England, Scotland and Wales. This structure enables our divisional management teams to use their locational knowledge and working relationships to buy land, design, build and sell homes which are well-suited to the local area.

Bellway are promoting this highly sustainable Site in Eccleshall for the delivery of much needed market and affordable homes, and we are fully committed to working with the Council and the community to make this happen.



Photograph of Bellway Development at Tidbury Heights incorporating a new country park

Bellway



Photograph of Bellway Development at Dickens Manor



Photograph of Bellway Development at Barley Fields

From: Nicholson, Sean [REDACTED]
Sent: 12 December 2022 11:38
To: Strategic Planning Consultations
Subject: Preferred Options consultation response by WSP E&IS on behalf of Bellway Homes Ltd - Land East of Church Lane and South of
Attachments: WSP E&IS for Bellway Homes Land at Hixon Final.pdf

Dear team,
Please see response attached.

This includes a written response to the consultation, forms and the Vision Document that was previously submitted.

Please do not hesitate to contact me if you require any further information.

Kind regards,



Sean Nicholson
Principal Consultant
MRTPI

[REDACTED]

[REDACTED]

wsp.com

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Stafford Local Plan

Draft Response on behalf of Bellway Homes Ltd: Land East of Church Lane and South of Egg Lane, Hixon

1. Introduction and Summary

Stafford Borough Council (SBC) is in the process of updating its Local Plan. It is now consulting on Preferred Options. Bellway Homes (Bellway) is responding on a number of aspects and this response relates to the development strategy set out in the Preferred Options Local Plan and associated policies. Site specific comments are then provided in relation to Land East of Church Lane and South of Egg Lane, Hixon.

The key issues identified in the Preferred Options document are as follows:

- The Local Plan should plan for more growth than the proposed 435 dwellings per annum, reflecting historical rates of development in the Borough but could also make a greater contribution to the unmet needs associated with neighbouring authorities;
- The Local Plan should commit to meeting unmet housing needs arising from other authorities. At the moment the provision for such needs is contingent on the delivery of housing at Meecebrook Garden Village;
- The assumed delivery rate for Meecebrook Garden Village is not justified and could lead to a significant shortfall in the supply of housing, including affordable housing during the plan period. Meecebrook contributes 24% of housing supply in the plan period;
- The inclusion of Meecebrook Garden Village in the Local Plan could cause significant delays to the progression of the Local Plan. Significant issues in relation to the duty to co-operate associated with infrastructure delivery will need to be resolved before the Local Plan is submitted. A review commissioned by Bellway and other interested parties highlights the amount of work there is to do to resolve issues associated with the delivery of the railway station at Meecebrook. Bellway therefore objects to the inclusion of Meecebrook in the Local Plan on the grounds that it is not well located and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes);
- The build out rates for other sites and the assumption on windfall rates are not justified;
- The proposed spatial strategy does not make sufficient provision for growth in the Larger Settlements, including Hixon. The lack of provision in the Larger Settlements is also not consistent with Paragraphs 20, 60 and 69 of the NPPF which include the need for Local Plans to ensure that a sufficient amount and variety of land can come forward where it is needed;
- The spatial strategy should allow for allocation of land for housing at other sustainable settlements. A housing needs assessment is needed for the Large Settlements to

inform an evidence-based distribution of development, to ensure that market and affordable housing needs can be met, the viability of local services and facilities supported and new infrastructure investment secured (via CIL/S106). This evidence would sit alongside the Settlement Assessment and SHELAA to help ensure a robust and justified approach to securing a sustainable spatial strategy (i.e. directing growth to where it is needed, where it is sustainable and where there are deliverable sites);

- Hixon is classified as a Larger Settlement. Hixon has three of Stafford's recognised Industrial Estates – Hixon Industrial Estate, Hixon Airfield and Pasturefields, giving it a unique and distinct role in sustainability terms, complemented by good access to other social and community facilities identified in the Council's Settlement Assessment¹ and frequent bus services into Stafford;
- The Council's own assessment confirms that Land East of Church Lane and South of Egg Lane, Hixon is suitable in terms of education, transport, heritage, landscape and infrastructure considerations. It also has the advantage of making use of previously developed land and buildings, consistent with Paragraph 119 of the NPPF; and
- The Site is available, the promoter, Bellway is a housebuilder committed to bringing the site forward in the short term. This will assist the Council through delivery of market and affordable homes in a highly sustainable settlement. The site should therefore be allocated in the Local Plan.

2. Development Strategy

Policy 1 of the emerging Local Plan sets out the amount of housing and employment to be provided in the plan 2020-2040 and the spatial distribution of new development.

Key elements of the policy are:

- Provision for 10,700 new homes (535 per annum);
- Provision for at least 80 hectares of new employment land;
- The housing requirement is proposed to be met through:
 - Completion of the North of Stafford and West of Stafford strategic development locations;
 - Completion of other existing commitments;
 - Proposed allocation at Stafford Station Gateway;
 - 3,000 homes at Meecebrook Garden Village by 2040 (with 3,000 homes delivered beyond 2040);
 - Other proposed allocations and windfalls.

2.1 Planning for new homes and jobs

The evidence base for the Local Plan notes that, due to its ageing population structure, natural change in Stafford Borough in the period 2020 to 2040 is projected to be negative in all Stafford

¹ <https://www.staffordbc.gov.uk/evidence-base-settlement-assessment-july-2018>

Borough Economic and Housing Development Needs Assessment (EHDNA)² scenarios. Deaths will exceed births. This means that the principal driver of the need for new housing will be net in-migration to the borough.

Policy 1 states that provision will be made for 10,700 dwellings (535 dwellings each year) between 2020-2040. Paragraph 1.2 of the supporting text states that the local housing need for the Borough is 435 dwellings which is above the minimum standard method figure of 391 dwellings for Stafford. Stafford Borough Council ('SBC') is also proposing a 2,000 dwelling contribution (100 dwellings per annum) towards meeting the needs of adjacent Housing Market Areas ('HMA').

The EHDNA notes that the reasons why the Council may consider identifying a higher housing requirement figure in its emerging Local Plan include the need to accommodate a sufficient economically-active workforce to meet needs arising from projected economic growth, in particular taking into account the future strategic economic growth planned for the Borough through a potential Garden Community and Stafford Station Gateway. These developments are anticipated to generate around 12,470 jobs. The EHDNA notes that 647 dpa is the number of homes needed to balance housing and jobs growth, allowing for employment growth proposed within the Local Plan but this takes no account of unmet housing needs arising from adjacent Housing Market Areas.

The Planning Practice Guidance ('PPG') states that there may be occasions where *"previous levels of housing delivery in an area...are significantly greater than the outcome from the standard method"* and *"authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests"* (Reference ID: 2a-010-20201216). Recent housing delivery in Stafford has been significantly more than the standard method figure of 391 dwellings and the proposed increase to 435 dwellings per annum. Table 13 of the 'Lead-in Times and Build Rate Assumptions' Topic Paper³ sets out that in 2020/21 614 dwellings were delivered and in 2021/22 506 dwellings were delivered. Bellway therefore consider that past delivery should be a key consideration in determining the housing requirement for the Borough and planning for more growth than the proposed 435 dwellings per annum.

Paragraph 11 of the National Planning Policy Framework (NPPF) states that: *"all plans should promote a sustainable pattern of development that seeks to meet the development needs of their area."*

The Local Plan is not consistent with Paragraph 11 of the NPPF because it fails to plan for a balance between homes and the jobs associated with planned employment growth. This could give rise to increased car based commuting into the borough. The evidence base for the Local Plan⁴ notes that Stafford borough produces 1.1 million tonnes of CO₂ through greenhouse gases (GHG) per year. This is higher than the average for the county of Staffordshire and for the UK as a whole on a per capita basis. It notes that the largest source of these emissions is, petrol and diesel, mainly for road transport use. Failing to provide a balance between homes and planned job growth is not likely to improve on the current position in relation to transport related GHG emissions and could worsen it.

In addition to the borough's own housing need, the development strategy allows for **2,000 homes as a contribution to meeting unmet need of other authorities in the region**. Those homes are the subject of ongoing negotiations with other regional authorities.⁵ The Sustainability Appraisal states at 5.2.25:

² <https://docslib.org/doc/3927264/stafford-borough-council-economic-and-housing-development-needs-assessment>

³ <https://www.staffordbc.gov.uk/lead-in-and-build-rate-assumptions-topic-paper>

⁴ <https://www.staffordbc.gov.uk/climate-change-topic-paper>

⁵ A joint response was received from the Black Country authorities at Issues and Options stage. This response highlighted the functional migration and commuting relationship between Stafford Borough and the Black Country and requested that Stafford Borough Council take between 1,500 and 2,000 homes as a contribution to meeting unmet need in the Black Country.

*“there is considered to be a need to focus attention on growth scenarios that would involve setting the housing requirement at **435 dpa** or a higher figure. A higher figure would likely be in response to unmet needs, as opposed to locally arising needs, and an obvious unmet needs figure for discussion is **2,000 homes, or 100 dpa over the 20 year plan period**, such that the local plan housing requirement would be set at **535 dpa**.”*

Bellway support SBC’s confirmation that a contribution will be made towards the Greater Birmingham and Black Country HMA (‘GBBCHMA’) and North Staffordshire HMA given the strong migration relationships identified in the evidence base (paragraph 1.30 of the Housing and Employment Land Requirement Topic Paper October 2022). However, Bellway objects to the 2,000 dwelling figure proposed. The NPPF (paragraph 31) and PPG requires policies to be justified and the evidence base “needs to inform what is in the plan and shape its development” (PPG Reference ID: 61-038-20190315). There is no information in relation to the consideration of needs arising from Greater Birmingham and North Staffordshire.

There is an identified shortfall of circa 28,000 dwellings across the Black Country up to 2039. Paragraph 1.32 of the HELN Topic Paper sets out that the Black Country authorities have requested for Stafford to take between 1,500-2,000 dwellings to assist in meeting their shortfall. However, SBC has not confirmed which HMA / authority need the proposed 2,000 dwelling contribution is seeking to address and it is unclear whether SBC has been part of any Duty to Cooperate discussions with other authorities to identify what contribution they require from the Borough. From the evidence provided, it seems that SBC’s proposed contribution will only cover the Black Country’s request and provide nothing towards the significant housing shortfall identified in Greater Birmingham of circa 78,000 dwellings up to 2042 (combined GBBCHMA shortfall of circa 106,0000 dwellings). North Staffordshire HMA has not confirmed at this stage whether there are any identified needs arising from the area so if there are than this will only add to the significant shortfall from the GBBCHMA.

The Housing and Employment Land Numbers Topic Paper⁶ prepared by the Council also notes that: *“The council is at present undecided on whether or not the Scenario D jobs-based uplift to local housing need can make an additional contribution to meeting unmet need. This will be considered further after the preferred options consultation.”*

The EHDNA also notes that in the period between 2008 and 2014 there was a significant decline in the rate of new household formation among the 15-34 age group. The EHDNA says that this was probably attributable to a range of factors including increased house prices, reduced earnings growth, stricter lending practices, and larger household sizes among new international migrants. A ‘partial catch up’ adjustment was proposed. The EHDNA concludes that the partial catch up will not be applied because there is no guarantee that building more homes would result in household formation in younger age groups. However this provides further justification for a housing target that reflects the local context.

2.2 Meecebrook’s contribution to housing in the plan period

Policy 1 states that 3,000 dwellings will be delivered at the proposed new settlement of Meecebrook by 2040. This amounts to 24% of growth proposed across the plan period. The NPPF (paragraph 31) requires policies to be underpinned by relevant evidence, which is adequate, proportionate and justifies the policies proposed. Bellway object to this proposed allocation and have significant concerns with the proposed delivery of this site given the limited amount of evidence provided to demonstrate its delivery.

The NPPF (paragraph 73) requires new settlements to be *“well located”* and **“supported by the necessary infrastructure and facilities (including a genuine choice of transport modes)”**.

⁶ <https://www.staffordbc.gov.uk/housing-and-employment-land-requirement-topic-paper>

Paragraph 73 of the NPPF goes on to state that Councils should “*identify suitable locations for such development where this can help to meet identified needs in a sustainable way*” through considering “*opportunities presented by **existing or planned investment in infrastructure***” [WSPs emphasis]. Bellway do not consider that the location of the Meecebrook allocation is ‘well-located’ given its distance from any key existing infrastructure. However, Bellway understand that the Meecebrook site has been selected by SBC because of the planned investment in a new station to serve the site. Bellway has significant concerns with the rail station proposal and its deliverability.

Paragraph 1.4 of the Local Plan notes: “*It is intended that any unmet housing need from other authorities will be delivered at Meecebrook Garden Community. This, in turn, is predicated upon Meecebrook being able to deliver 3,000 homes within the plan period. If further evidence indicates that Meecebrook would deliver fewer than 3,000 homes within the plan period, then the quantum of unmet needs the borough is able to accommodate would likewise need to be reassessed.*”

The prospect of the quantum of housing being reassessed at some point in the event that Meecebrook Garden Community does not deliver 3,000 homes could mean that there is a bigger imbalance between homes and job growth in the Borough but also that needs arising within the Borough are not fully met. Moreover it is noted that Meecebrook does not contribute to housing need until 2030, suggesting that the contribution towards unmet needs from other authorities would be met by other sites before then. There is a very significant housing shortfall within the GBBCHMA (circa 106,000 dwellings) which needs to be addressed immediately rather than in the latter part of the plan period (or in this plan period at all). Allocating deliverable sites across the Borough’s existing sustainable settlements, such as Hixon (Tier 4 settlement), will ensure that the needs of the HMA are met in the short and medium term rather than being pushed to a site that is currently not sustainable (no confirmation on when the rail facilities will be delivered, if at all given the weak business case and lack of engagement and support from Network Rail) and is unlikely to deliver any dwellings within the next 10 – 15 years.

The Council has produced a paper on lead in and build rate assumptions, based on analysis of housing completions from 1 April 2011 to 31 March 2022.⁷ The paper also references the Lichfield Report (From Start to Finish).⁸

The Council has assumed that development at Meecebrook would commence in 2030. It is important to note that any issues associated with the duty to co-operate will need to be resolved prior to the Local Plan being submitted for examination. As the duty to cooperate relates to the preparation of the plan it cannot be rectified post-submission, so if the Inspector finds that the duty has not been complied with, they will recommend that the local plan is not adopted and the examination will not proceed any further (Planning Practice Guidance Paragraph: 031 Reference ID: 61-031-20190315). There is a danger that issues associated with the delivery of Meecebrook, which relate to the duty to cooperate, impact on progression of the Local Plan, particularly issues associated with:

- provision of the new railway station,
- funding,
- viability (including the impact this could have on the provision of affordable homes);
- delivery,
- land ownership;
- necessary strategic highway infrastructure upgrades and

⁷ <https://www.staffordbc.gov.uk/lead-in-and-build-rate-assumptions-topic-paper>

⁸ <https://lichfields.uk/content/insights/start-to-finish#downloadcollapse>

- agreement around meeting unmet housing need arising from outside of the Borough (which paragraph 1.4 of the Local Plan suggests is dependent on delivery of Meecebrook).

The annual build out rate assumed by the Council for sites over 2,000+ homes set out in the paper at Table 12 is 160 dpa (which is consistent with the Lichfield Report). However the paper notes (at paragraph 5.27) that any sites for more than 2,000 dwellings are assumed that they will have their own projected housing trajectory so will not necessarily follow this assumption. Paragraph 6.4 of the note includes an assumption that development at Meecebrook begins in 2030 and that it delivers 300 homes per annum. There is no explanation in the paper as to how the rate of 300 dpa has been arrived at. Table 12 in the LTBRA Topic Paper sets out SBCs proposed annual build rate assumptions and states that on sites of 2,000+ dwellings the proposed trajectory is 160 dwellings per annum. This aligns with Table 10 of the Council's Lead in and Build out Rates Topic Paper, which sets out the findings of the Lichfields Report. It is therefore unclear why SBC is proposing for Meecebrook to deliver almost double the figures identified in Tables 10 and 12 when SBC's own evidence is stating that a realistic assumption is 160 dwellings per annum. The proposed delivery rate is therefore considered to be unrealistic, over stated and therefore contrary to NPPF paragraph 73d, which requires strategic policy making authorities to make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites.

In terms of the 2030/31 delivery commencement date, Bellway also do not consider that this is realistic. Table 5 of the LTBRA Topic Paper shows Lichfields' timeframe assumptions from validation to completion of the first dwellings on a site. For 2,000+ dwellings, the average is 8.4 years. Table 7 shows SBC's assumptions on timescales and this only shows sites of 500+ which SBC consider will only take 4.5 years from validation and completion of the first dwellings. This is wholly unrealistic and given SBC's limited experience in delivering sites of 3,000 dwellings. SBC should be relying on the evidence of other authorities and Lichfields. In the best case scenario (i.e. application is validated upon the adoption of the Local Plan in October 2024), SBC should not be projecting the completion of any dwellings at Meecebrook until 2033/34 (8.4 years from October 2024) at the very earliest. However, given not all of the landowners are currently part of the promotion and the scale and cost of required infrastructure is unknown, we do not consider that it is likely an application would be ready for submission by October 2024.

In light of the above, in the best case scenario, SBC will need to identify sites to accommodate a minimum of 600 dwellings which will not be delivered in 2030/31 and 2031/32 as currently shown in Table 13 of the LTBRA Topic Paper. This shortfall will only increase when SBC provide a more realistic assumption for the first couple of years of construction and it is extremely unlikely that the site will consistently deliver the same 'maximum' number of dwellings across the whole build period when infrastructure triggers are taken into account. There are likely to be fluctuations in delivery which should be considered.

Paragraph 22 of the NPPF states that:

“Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.”

Local Plan Policy 7 in relation to Meecebrook states that development can only commence once a route to funding and delivery has been identified. This includes any necessary strategic highways and infrastructure upgrades. In order to be compliant with Paragraph 22 of the NPPF the Local Plan would need to set out the necessary strategic highways and infrastructure upgrades. This point is also relevant in relation to issues associated with the duty to co-operate highlighted above, as National Highways and Network Rail are statutory consultees.

Bellway was part of a consortium of interested parties that commissioned a review of the proposals for a new railway station at Meecebrook and associated technical work. The review was undertaken by an independent consultant, Intermodality. This is attached as **Appendix A** to these representations.

The Intermodality Report highlights several key issues and areas of risk in developing a brand new, multi-platform station on the West Coast Main Line (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;
- The conclusion from previous work undertaken by 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 previous work undertaken by SLC that the station business case would achieve a Benefit Cost Ratio (BCR) of 1.5, at the low end of the range for “medium” value for money.

The review highlights that 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 Train Operating Companies (TOCs), Rail Freight Operating Companies (FOCs), Department for Transport (DfT) and other industry stakeholders. A Freedom of Information Request to Network Rail that is included with the review highlights that no engagement appears to have taken place with Network Rail at this stage.

Table 2 of the review sets out how the work undertaken to date aligns with Network Rail’s guidance on investment in stations and highlights key gaps in the work undertaken to date.

The review concludes that, as recommended by the Council’s own advisers, the merits, deliverability and acceptability of the proposed new station can only be confirmed with proper input

from Network Rail, at least up to Engineering Stage 2 of the company's corporate governance for assessing new stations (Project Acceleration in a Controlled Environment or PACE), as well as input from other key stakeholders, including but not limited to:

- 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;
- FOCs, namely Colas Rail, DB Cargo, DC Rail, DRS, Freightliner, GB Railfreight and Varamis Rail;
- Rail Delivery Group and the Rail Freight Group;
- DfT;
- Office of Rail & Road.

Agreement in relation with Staffordshire County Council and bus operators will also be required. The Sustainability Appraisal⁹ accompanying the Local Plan states at page 96: *"the question arises as to whether one or more high quality (i.e. fast and frequent) bus services could effectively link Stoke-on-Trent and Stafford via both Meecebrook and Stone. This is a detailed question for the County Council and the bus companies."* Page 96 of the SA also notes that *"There would also be a need to carefully consider traffic flows, including noting that the new red line boundary, since the Issues and Options stage is further from the M6 corridor and closer to the A5013. There would be a clear need to consider traffic flows through Eccleshall, and there are likely to be other sensitive / hotspot roads and junctions."*

Paragraph 106 of the NPPF requires planning policies to be prepared with the active involvement of local highways authorities and other transport infrastructure providers and operators so that strategies and investments for supporting sustainable transport and development patterns are aligned. In order to comply with the NPPF issues around delivery of the railway station and highways and other infrastructure associated with Meecebrook need to be front loaded and addressed in the Local Plan, rather than development being dependent on them being addressed.

In regard to the wider infrastructure proposed to support a settlement of 6,000 dwellings, contrary to NPPF paragraph 31, there is very little information included within the evidence base documents to set out what level of infrastructure is required and whether its delivery is viable or deliverable. The Council's Viability Assessment (September 2022)¹⁰ is based on very high level assumptions and clearly sets out that so far there has been little input on likely infrastructure costs. Paragraph 73 of the NPPF states that policies for new settlements should *"ensure that appropriate tools such as masterplans and design guides or codes are used to secure a variety of well-designed and beautiful homes to meet the needs of different groups in the community"*. However, the Viability Assessment (paragraph 6.42) concludes that in order to deliver 40% affordable housing and be viable, the development would not be able to meet other policy requirements and is likely to impact on the quality and future-proofing of the site (e.g. accessibility standards, electric charging points etc). As the largest allocation in this plan period (and potentially the next plan period with a further 3,000 dwellings expected), for this site to potentially not deliver affordable housing or other policy requirements seeking to meet future homes standards is unacceptable and will be contrary to paragraph 60 of the NPPF as the specific housing needs of different groups will not be addressed .

Page 86 of the Viability Assessment confirms that there is a lack of clarity around landowner commitment. In order for SBC to demonstrate that this site is 'deliverable', there should be clear evidence to demonstrate that all of the landowners within the proposed Meecebrook allocation are

⁹ <https://www.staffordbc.gov.uk/interim-sustainability-appraisal-report>

¹⁰

<https://www.staffordbc.gov.uk/sites/default/files/cme/DocMan1/Planning%20Policy/New%20Stafford%20Borough%20Local%20Plan%202020-2040/Evidence%20Base%20Documents/Stafford-Borough-Council-Local-Plan-and-CIL-Viability-Assessment-Accessible.pdf>

willing for their land to form part of the allocation and have agreed to collaborate to bring a development of this scale forward. This is particularly important for a development of this scale given this site will be delivered over a long period of time and will involve complex equalisation agreements to deliver the joint infrastructure. Without landowner support, how is SBC expecting to deliver the site in such over-ambitious timescales?

Policy 7 of the Local Plan also refers to a Framework Masterplan Supplementary Planning Document (SPD) being prepared for the site, including consideration of phasing, which could also add to lead in times. An SPD cannot allocate land for development, as it does not form part of the development plan, which means that decisions around the location of the local centre, employment and railway station will need to be made as part of Local Plan preparation so that these can be identified on the Local Plan proposals map.

The Inspector for the examination into the Tunbridge Wells Local Plan recently raised concerns around the treatment of large scale strategic allocations in the submitted Local Plan in his initial findings.¹¹ The Inspector raised concerns regarding the adequacy of the evidence base in relation to the new settlement at Tudeley Village (new settlement of 2,800 dwellings), as well as in relation to aspects of the growth at Paddock Wood (3,500 homes and 11 ha employment).

In relation to Tudeley Village the Inspector highlighted the need for the Local Plan evidence base to include additional information in relation to infrastructure requirements, including funding and phasing and the relationship between delivery rates and viability.

In the absence of this information in the Local Plan he concluded that the Local Plan required modification to make it sound and capable of adoption.

He concluded that providing additional information in relation to Tudeley Village would not be a quick or straightforward exercise. Modifying the policy could also add significant delays to the examination process. The third option he presented was to delete the allocation and make consequential changes to the Local Plan.

Similarly, the Inspector's Report into the Shared Strategic Local Plan for North Essex¹² concluded in relation to the Garden Community proposals that they need to demonstrate a reasonable prospect of being viably developed, setting out clear details of phasing of necessary infrastructure linked to a delivery timetable and that any garden community proposals must be clearly shown to be financially viable.

The above highlights the importance of the Local Plan front loading relevant issues in relation to the delivery of Meecebrook at the time it is submitted.

In summary, Bellway considers that the proposed allocation of land at Meecebrook for 3,000 dwellings is contrary to the NPPF (paragraph 73) as the site is not well-located, the planned rail infrastructure is likely to be undeliverable and the proposed rates of delivery and lead-in time are not realistic or supported by any evidence. Bellway therefore considers that additional housing sites should be allocated adjacent to the existing and sustainable Tier 4 settlements in place of Meecebrook. Should SBC have an aspiration to deliver a new settlement in the long term then further feasibility and technical work should be undertaken and it should be clear within the emerging Local Plan that it will not form part of the housing requirement until there is more certainty on its deliverability.

Given the concerns associated with the delivery of Meecebrook, Bellway objects to the proposed allocation.

¹¹ https://forms.tunbridgewells.gov.uk/_data/assets/pdf_file/0007/434392/ID-012-Inspectors-Initial-Findings.pdf

¹² <https://www.braintree.gov.uk/downloads/file/2940/examiners-report-on-the-examination-of-nea-s1-10th-dec-2020>

2.3 Contributions from other Settlements

Under the Preferred Options Local Plan, the broad spatial distribution of housing is:

- windfalls – (6%)
- Stafford (59%)
- Stone (7%)
- Meecebrook (24%)
- Larger settlements (4%)
- Smaller settlements (≤ 1%)
- Rural area (≤ 1%)

The Council has assumed that 750 homes come forward as windfall sites in the plan period (50 homes per annum) but the Local Plan does not provide any evidence as to why this figure is justified. Paragraph 71 of the NPPF notes: *“Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends.”* It is considered that in order to comply with the NPPF, SBC should clearly set out within the evidence what the historic windfall delivery rates have been in the Borough.

The delivery rates assumed for the Northern Stafford and Western Stafford SDLs set out in Table 13 of the Council’s Paper on Build out Rates also look high for the period 2026/7 to 2029/30 when compared with the Council’s own assumptions set out in the paper for sites of that size and are also higher than recent historical rates achieved at the sites.

Currently, only 234 homes are proposed through new allocations in Larger Settlements over the plan period. Settlements that can provide a sustainable location for growth, currently categorised within these groups should have a greater role in meeting housing needs, given the uncertainties associated with delivery at Meecebrook. The settlement hierarchy is discussed below in the response to draft Local Plan Policy 2.

The lack of provision in the Larger Settlements is not consistent with Paragraph 20 of the NPPF, which requires strategic policies to set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for housing (including affordable housing).

The lack of provision in the Larger Settlements is also not consistent with Paragraph 60 of the NPPF which states in part that: *“To support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed.”*

Paragraph 69 of the NPPF also notes that small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly.

The Council’s own analysis of settlements¹³ demonstrates how the Larger Settlements can contribute to sustainable development in terms of:

- *“supporting support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with*

¹³ <https://www.staffordbc.gov.uk/revised-settlement-assessment-and-profiles-topic-paper>

accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being.” (NPPF Paragraph 8b)

- Supporting a prosperous rural economy – NPPF Paragraph. 84.d “...*the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.*”
- Promoting Sustainable Transport – NPPF paragraph 105 “*Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.*”
- Promoting healthy and safe communities – NPPF Paragraphs. 93.a, c and e “*To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:*
 - *a) plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;*
 - *c) guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs;*
 - *e) ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.*”
- Promoting healthy and safe communities – NPPF Paragraph. 95: “*It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education.*”
- Promoting healthy and safe communities – NPPF Paragraph. 98: “*Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change.*”

Hixon is identified as a Larger Settlement in the Council's review, which benefits from a range of local services, an established location for employment within the Borough and an hourly bus service between Uttoxeter Town Centre and Stafford Town Centre between 07:28 and 17:43 Mondays and Saturdays.

Hixon provides a highly sustainable location for growth that should play a greater role in meeting housing needs in the plan period.

2.4 Settlement hierarchy

The settlement hierarchy set out in Local Plan Policy 2 is integral to the spatial strategy. Meecebrook is identified as a new tier (Tier 3). Given uncertainties around its delivery it seems premature to identify the proposal in this way. Without the rail infrastructure, Meecebrook should not be considered as a more sustainable development opportunity than existing settlements listed under Tier 4..

2.5 Sustainability Appraisal

The Sustainability Appraisal includes consideration of potential strategic allocations, including Meecebrook. The SA makes numerous references to the potential for a railway station at this

location but then flags uncertainty in this respect. It is suggested that, this option is assessed under two scenarios, one with a train station and one without. This would then help make the assessment of this option more transparent. There are various comments in relation to Meecebrook offering opportunities for decarbonisation but no firm proposals are presented in the SA. All new dwellings will need to comply with the Future Homes Standard from 2025 and decarbonising of the electricity system continues.

The SA also includes consideration of various combinations of sites based on a 'to find' figure of 2,150 homes for additional allocations but this is predicated on some allocations, including Stafford Station Gateway being included in all of the options (page 5 of the non technical summary)¹⁴. The options considered include an option based on growth at Gnosall, Hixon and Weston (Option 1). The number of dwellings associated with this option is not clear because two options are identified for Hixon (128 homes or 1,985 homes associated with development at Hixon Airfield). Given the to find figure of 2,150 homes, it is not clear what assumptions have been made about the capacity of the sites that contribute to Option 1. Taking the capacity for Gnosall (463 dwellings), 128 dwellings at Hixon and 175 dwellings at Weston would provide 766 dwellings, which is 1,384 short of the 'to find' figure. It is not therefore clear if Option 1 represents a reasonable alternative (couched in the terms of the approach taken in the SA).

Given the number of sites that the Council has identified the grouping of sites in this way is considered unnecessary. The site selection process should adopt an approach based on the position of settlements in the hierarchy, consideration of local housing need, informed by a housing need assessment by settlement, the planning merits of each of the shortlisted sites and consideration of whether or not their allocation is necessary (consistent with Paragraph 23 of the NPPF).

2.6 Failure to Identify an Appropriate Strategy

As noted above, the Local Plan assumes that Meecebrook provides 24% of housing supply between 2020 and 2040, but delivery is not anticipated to commence until 2030 and then at a constant rate of development (300 dpa) that is not considered to be realistic, particularly in the earlier phases of the development. Larger settlements contribute just 4% of supply and smaller settlements 1%. Given uncertainties in relation to delivery of Meecebrook, this is not considered to be an appropriate strategy.

Given uncertainties in relation to the delivery of Meecebrook, the Local Plan should include greater allowance for development at other settlements in order to ensure that it has been positively prepared (consistent with Paragraph 35 of the NPPF). A housing needs assessment is needed for the Large Settlements to inform an evidence-based distribution of development, to ensure that market and affordable housing needs can be met, the viability of local services and facilities supported and new infrastructure investment secured (via CIL/S106). This evidence would sit alongside the Settlement Assessment and SHELAA to help ensure a robust and justified approach to securing a sustainable spatial strategy (i.e. directing growth to where it is needed, where it is sustainable and where there are deliverable sites). Reduced reliance on Meecebrook would also ensure a steady supply of affordable housing throughout the plan period.

Policy 12 of the Local Plan should be updated to reflect additional allocations required to meet the shortfall identified from Meecebrook and provide a more meaningful contribution towards meeting the adjacent HMAs' needs. These allocations should be in the larger settlements and should include Bellways land East of Church Lane and South of Egg Lane, Hixon.

¹⁴ <https://www.staffordbc.gov.uk/interim-sustainability-appraisal-non-technical-summary>

2.7 Conclusions on the Proposed Development Strategy

Given the above concerns it is concluded that the approach set out in the **Preferred Options Local Plan does not comply with paragraph 35 of the NPPF in that it is:**

- not positively prepared, with Paragraph 1.4 of the Local Plan suggesting that unmet need from neighbouring areas might not be accommodated in the event that Meecebrook cannot deliver 3,000 homes within the plan period;
- not justified, given uncertainties around the delivery of the Garden Community as reliance on it is not an appropriate strategy;
- not effective – as the 3,000 dwellings at the Garden Community may not be deliverable over the plan period;
- not consistent with national policy – given the failure to ensure a balance homes and planned job growth and provide a long term vision, consistent with paragraph 22 of the NPPF.

2.8 Changes sought to the Spatial Strategy

The Local Plan should plan for additional housing growth, including needs arising from neighbouring local authorities.

The Local Plan should commit to meeting unmet housing need arising from neighbouring areas and identify sites that will help meet such needs across the plan period. Provision of such housing should not be contingent on Meecebrook coming forward at the rate anticipated in the Local Plan.

Meecebrook should not be relied upon to deliver growth in the plan period as the delivery of the site is uncertain and the assumptions for delivery on site are not justified. Considerations around the duty to co-operate and the need for the Local Plan to provide a long term vision, consistent with paragraph 22 of the NPPF suggest that uncertainties around the delivery and viability of Meecebrook could delay the Local Plan. These are significant areas of uncertainty relating to whether or not the site will accommodate a new railway station and what upgrades would be required to the strategic road network. Should SBC have an aspiration to deliver a new settlement in the long term then further feasibility and technical work should be undertaken and it should be clear within the emerging Local Plan that it will not form part of the housing requirement until there is more certainty on its deliverability.

The spatial strategy should allow for allocation of land for housing at other sustainable settlements, such as the Larger Settlements, including Hixon. A housing needs assessment is needed for the Large Settlements to inform an evidence-based distribution of development, to ensure that market and affordable housing needs can be met, the viability of local services and facilities supported and new infrastructure investment secured (via CIL/S106). This evidence would sit alongside the Settlement Assessment and SHELAA to help ensure a robust and justified approach to securing a sustainable spatial strategy (i.e. directing growth to where it is needed, where it is sustainable and where there are deliverable sites).

The settlement hierarchy at Policy 2 should be amended. Meecebrook does not warrant identification as a new tier at this stage. It should at least be caveated or could be identified with the larger settlements until such time as it has the critical mass to warrant separate categorisation, should it go ahead.

Given the concerns outlined above, Policy 7 in relation to Meecebrook should be amended to reflect the longer term nature of the proposal and not relied upon to deliver housing requirements within the plan period.

3. Land East of Church lane and South of Egg Lane, Hixon

The Council has assessed sites submitted through the SHELLA.

A total of 290 sites were assessed in stages:

- Stage 1 sites with constraints rendering them non developable were rejected (after having considered the potential to adjust site boundaries to address the issue). 217 sites progressed beyond this stage.
- Stage 2 – reject sites not well linked to a settlement. 156 sites progressed beyond this stage.
- Stage 3 – further detailed work, including engagement with consultants and key consultees.
- Stage 4 - evidence-based decision to select or reject sites. 57 sites progressed beyond this stage (9 of them related to Meecebrook).

Land East of Church Lane and south of Egg Lane, Hixon (the Site) was one of the 48 sites not associated with Meecebrook that progressed beyond stage 4. This section of our response comments on the Council's evaluation of the site and the reasons for its rejection.

Additional information is also provided in relation to planning for schools places at **Appendix A** to this response.

This response is structured around the criteria used by the Council to evaluate sites but consideration is first given to the boundary of the Site.

3.1 Site Area

Details of the Site were submitted to the Council on 9th August 2021 and acknowledged by email by a member of the Council's planning team on the same day. The following were also submitted:

- A Vision Document (which is included with these representations);
- A completed call-for-sites form;
- A supporting transport strategy;
- A historic environment assessment;
- A preliminary drainage strategy.

The boundary of the site as shown in the Vision Document is shown on **Figure 4.1** below.

Figure 4.1 Land East of Church Lane and south of Egg Lane, Hixon



3.2 The Council's Assessment of the Site

The Council has assessed the site in two parcels (HIX01 'Grange Hill Farm' and HIX04 'Land West of Egg Lane'). It is requested that going forward these parcels are treated as one site by the Council, consistent with the information submitted to the Council on 9th August 2021).

The Council's assessment of the shortlisted sites considered the following topics:

- education
- transport
- ecology
- landscape
- heritage
- water
- electricity

These are commented on below as they relate to the Site.

Education

The Council's site evaluation notes that St Peter's CE Primary School can accommodate development. The school is approximately 190m of the site, which equates to a circa 2 minute walk or a circa 1 minute cycle. .

The assessment of school places provided by EFM attached as **Appendix B** notes that, as of the previous academic year, was operating at 83% of its available capacity with 34 spare places. It should be noted that this development is forecast to generate a maximum of 19 primary school aged pupils. There is also a neighbouring development currently under construction for 30 dwellings that is expected to generate approximately 6 pupils when fully built-out. Therefore, there is sufficient capacity for the forecast pupils. Indeed given that the school was operating under its available capacity in the previous academic year, combined with a fall in birth numbers identified at **Appendix B** suggests that development will help support the school.

The Council's site evaluation notes that Weston Road Academy (secondary education) serves Hixon and transport by bus is provided from the village. The Council's evaluation notes that the school could potentially be expanded. Financial contributions towards expansion of the school

could be made via a S106 agreement. Current lack of capacity in this respect is not therefore a sound reason for not pursuing this site.

Transport

The Council's assessment states that access would be available from the existing estate road off Church Lane (this is St Peters View). St Peters View was part of application 13/19784/FUL and is a cul-de-sac which measures approximately 5.5m in width and gives access to the 7 dwellings constructed as part of 13/19784/FUL and the 30 dwellings associated with application 14/20548/FUL. There are footways on both sides of the carriageway. St Peters View forms a standard T- junction with Church Lane.

The Vision Document also notes that a potential pedestrian/emergency access can be provided on to Egg Lane to the north east if required.

The Council's assessment includes an accessibility score of 3/6 but there is no explanation for this score in the technical material that we could see.

The site has good accessibility by foot/cycle to local facilities and services (as highlighted in the material previously submitted). The Vision Document identifies the opportunity to provide an enhanced network of walking routes. The proximity of the Site to existing employment provides opportunity to live and work locally.

There is an hourly bus service between Uttoxeter Town Centre and Stafford Town Centre between 07:28 and 17:43 Mondays and Saturdays.

Given the scale of development envisaged at the Site, it is concluded that it provides a sustainable location in terms of transport related considerations. Employment, education and social and community facilities are available locally, within walking distance and development will help support the existing bus service, which provides modal choice.

Ecology

The Council's assessment identifies the site as medium/low overall ecological sensitivity and amber in terms of Great Crested Newt (GCN) risk impact zone. The Council's Ecological Assessment Report¹⁵ states in relation to GCN – where there are ponds either on site or nearby (a minimum of 500 metres up to 2 km from the site boundary), a newt survey should be carried out to determine whether GCN are resident. The Assessment Report notes that detailed protection and mitigation proposals will be a legal requirement and further specialist work will be needed. A site being located within a GCN risk impact zone does not prevent a site from being developed and is not a reason to not allocate a site.

The Council's Ecological Assessment Report also considers the site (HIX01) and the following measures are identified in the report:

- Incorporate species rich grassland creation/enhancement into any design schemes.
- Retain hedgerows as these will benefit habitat connectivity into the wider landscape.
- Ensure that habitats adjacent to the site are subject to a full ecological survey at an appropriate time of year for the habitat. If higher quality habitats exist, conserve and ensure there are no negative impacts. Or if habitats are degraded, use as an opportunity to improve their quality.
- Retain areas of scrub or provide scrub as part of any design schemes.

¹⁵ <https://www.staffordbc.gov.uk/stafford-borough-ecological-assessment-report>

The Vision Document notes that there are opportunities to provide improved habitat provision as part of any scheme at the Site and secure a net gain in biodiversity, on a site which at present is unlikely to have significant ecological interest. New planting and habitats would complement and reinforce the existing hedgerows and tree planting which sit towards the edge of the Site. There is also the opportunity to open up the existing culvert which, alongside the provision of new ponds as part of the sustainable drainage network, can deliver further benefits for wildlife. The ability to deliver net gain is supported by the extent of land which Bellway controls in this location, which includes land beyond the Site's immediate southern boundary. Net gain is therefore a deliverable and realistic prospect for this site. Ecological surveys would form part of any future planning application.

Landscape

The Council's assessment for the site identifies the site as medium sensitivity.¹⁶ The site was assessed by the Council as two parcels (HIX01 to the north and HIX04 to the south). The assessment for HIX01 identifies the site as medium/low sensitivity. The assessment for HIX04 identifies the site as medium sensitivity. The need to maintain views to St. Peter's spire where possible, retain the Public Right of Way along the site's western boundary within a green corridor, providing an attractive frontage to it, retention of existing vegetation and a landscaped edge where the site adjoins the countryside. The Vision Document previously submitted includes a concept plan that incorporates all of these development considerations.

The Vision Document also notes that the Site provides an opportunity to deliver homes in a part of Stafford Borough beyond the Cannock Chase Area of Outstanding Natural Beauty and other more sensitive landscapes. The Site is outside of the very high and highly sensitive landscapes, in an area of moderate landscape sensitivity where opportunities to encourage small-scale landscape improvements can be considered – such as hedgerow maintenance, habitat creation and tree planting – all things that can be incorporated as part of the masterplanning for the Site.

Heritage

The Council's site evaluation notes there are medium direct impacts, Low setting impacts and no substantial harm in relation to heritage.

The detailed assessment for HIX04 accompanying the Council's evaluation¹⁷ says that any planning application should be accompanied by a heritage impact assessment which should consider the potential for both direct and setting impacts. Mitigation measures including historic building recording, a trial trench evaluation and a geophysical survey are recommended in order to address the potential for direct impacts upon any archaeological remains that may be present.

The Vision Document notes that the site lies to the east of the Grade II listed St Peter's Church, its setting can be reflected as part of the masterplan, providing views towards the church to support the appreciation of this asset. The former WWII buildings to the south east of the site are non-designated assets of low historic significance. Whilst these are of some local interest they are dilapidated and unsafe – re-using or converting these buildings is unlikely to be feasible. Nevertheless, as proposals progress, the key features of the buildings can be recorded for posterity, and an information board could be provided as part of the scheme to highlight the site of this local historic interest. Further details were provided as part of the Heritage Appraisal that accompanied the Vision Document and which assesses the Site's relationship with heritage assets and archaeology in this location.

¹⁶ <https://www.staffordbc.gov.uk/stafford-borough-landscape-sensitivity-study-report>

¹⁷ <https://www.staffordbc.gov.uk/stafford-borough-historic-environment-site-assessment-stage-1-report>

Water

The Council's site evaluation notes that there is low impact on sewerage infrastructure and medium potential impact on surface water sewerage infrastructure.

The Vision Document notes that the Site is sequentially preferable lying outside of the EA's flood risk zones. The supporting technical note – Flood Risk and Drainage Feasibility – that was previously provided identifies the opportunity to provide sustainable drainage features and open up the existing culvert as part of an attractive green corridor on the southern part of the site, providing new habitats and recreational routes for existing and future residents. As the lower lying part of the Site, the route of the culvert is also an area of surface water flood risk, so no development is therefore proposed here.

The Vision Document also shows how existing sewers that cross the site can be incorporated into the scheme. The preliminary drainage strategy identified that Severn Trent Water had confirmed that the available outfall is the existing foul sewer located immediately south of the site.

Electricity

The Council's site evaluation states that there are no issues in relation to electricity. Bellway are not aware of any technical impediments in this respect that could not be addressed. In terms of achieving a reduction in energy use, Bellway is undertaking extensive work to redesign homes to meet the new energy efficiency standards. The company is building various exemplar homes in advance of the new Future Homes Standards which includes monitoring performance and running costs for the long term benefit of customers. Homes on this site would be built to Future Homes standard.

Outcome of the Council's Site Assessment

The Council's Site Assessment identifies the Site as a potential site option, noting that secondary school capacity constraints would need to be resolved. The Site was then included in the Sustainability Appraisal as 'Land East of Church Lane' (at page 118).

Sustainability Appraisal

The Sustainability Appraisal includes consideration of a series of options, including one that allows for some development at Hixon. As noted in the main response it is not clear if this option represents a reasonable alternative because the number of homes the option would deliver is not made explicit in the SA Report.

Appendix V of the SA Report includes a GIS analysis of sites. This is based on distances to designated sites etc.

The following comments are made:

- Proximity to European sites – any issues in relation to European sites should be considered through the Habitats Regulations Assessments of the Local Plan. The relative proximity of the Site to these designations does not prevent its allocation and the Council's Ecological Assessment Report raised no concerns in terms of proximity to these sites;
- There is a red score in relation to proximity to 'Protected Employment Land' but this term is not defined and it is not clear why this score has been assigned. The Site benefits from proximity to existing employment in Hixon at Airfield Industrial Estate which is within walking distance of the site;

- There is a red score against proximity to a Town Centre, as is the case with most sites. There is an hourly bus service between Uttoxeter Town Centre and Stafford Town Centre between Mondays and Saturdays. Local facilities within Hixon include a convenience store (Morrisons Daily), post office, community hall, public house and place of worship.

3.3 Conclusions

Hixon is classified as a Larger Settlement. Hixon has three of Stafford's recognised Industrial Estates – Hixon Industrial Estate, Hixon Airfield and Pasturefields, giving it a unique and distinct role in sustainability terms, complemented by good access to other social and community facilities identified in the Council's Settlement Assessment¹⁸ and frequent bus services into Stafford. The Council's own assessment confirms that the site is suitable in terms of transport, heritage, landscape and infrastructure considerations. It also has the advantage of making use of previously developed land and buildings, consistent with Paragraph 119 of the NPPF. This does not appear to have been factored into this stage of the Council's assessment. The Vision Document demonstrates that a high quality new neighbourhood can be readily accommodated at the Site and development can be brought forward in the short term by a national housebuilder.

Changes sought to the Local Plan

The Council should plan positively in relation to the future provision of school places, rather than using existing capacity issues as a reason for reliance on Meecebrook. In this instance the primary school has capacity and the secondary school has potential for expansion.

Going forward the consideration of the Site should be on the basis of the boundary provided, rather than the site considered as two parcels.

The Site is available, the promoter, Bellway is a housebuilder committed to bringing the site forward in the short term. This will assist the Council through delivery of market and affordable homes in a highly sustainable settlement. The site should therefore be allocated in the Local Plan.

¹⁸ <https://www.staffordbc.gov.uk/evidence-base-settlement-assessment-july-2018>

Appendix A Meecebrook – Review of new passenger station proposals, Intermodality

Meecebrook

Review of new passenger station proposals

5th December 2022

Document history

Date	Version	Issued to	Status	Quantity	Format	Approved
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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:

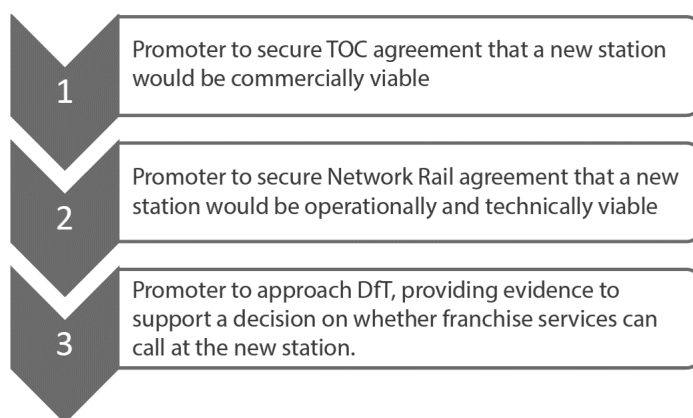
⁴ Pages 3-4

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>

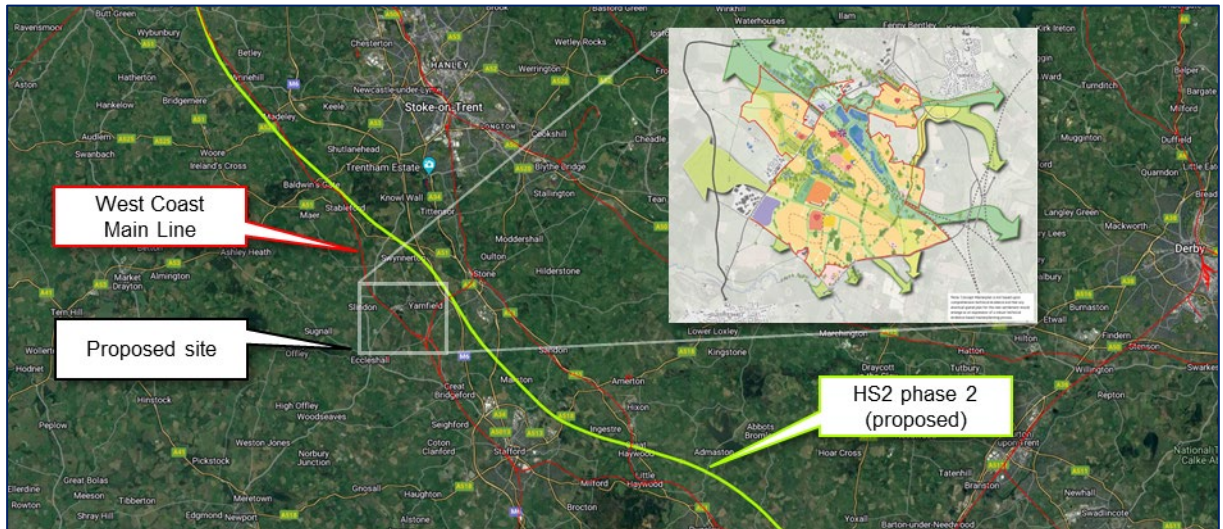
¹⁶ <https://governance.wmca.org.uk/documents/s5126/Report.pdf>

3 The proposed site

3.1 Location

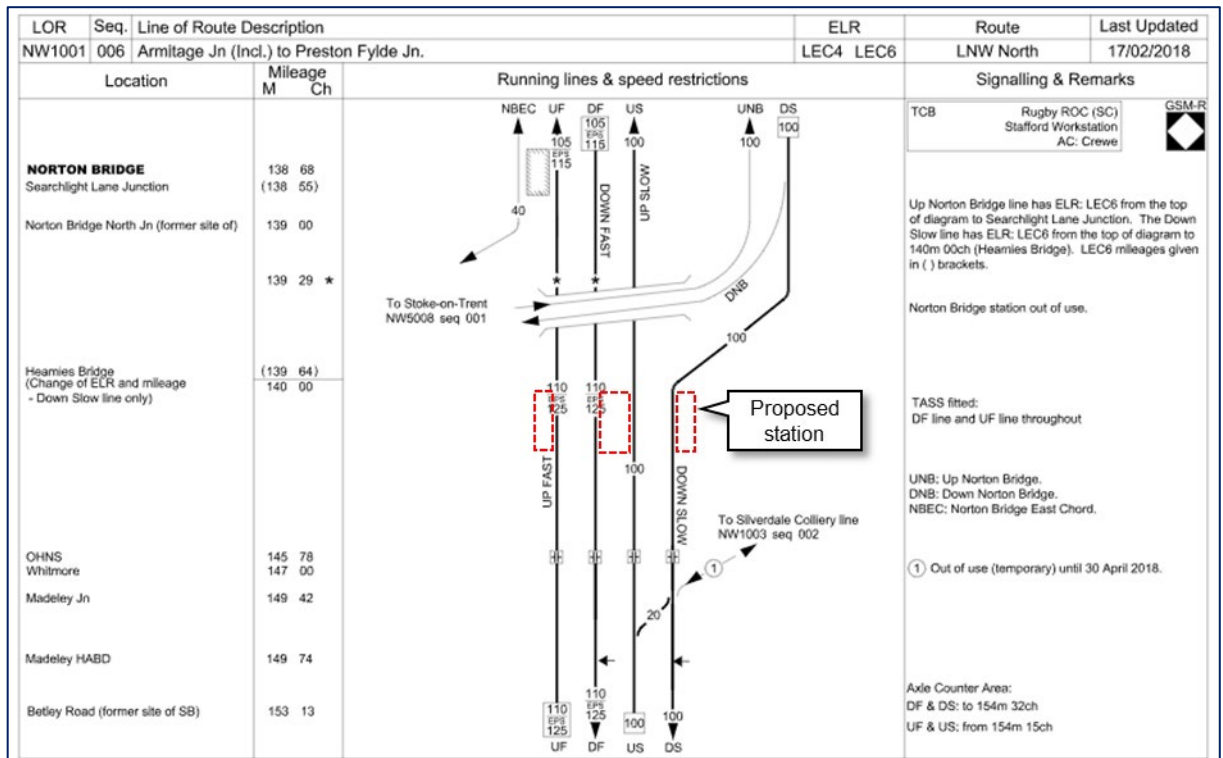
3.1.1 The location of the site relative to the West Coast Main Line (WCML) is shown in the Figure below:

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

31 October 2022

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, [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".

Intermodality



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Appendix B Education Landscape Assessment, EFM



9th December 2022

Bellway Homes Limited
BY EMAIL ONLY

REF: LAND AT CHURCH LANE, HIXON, STAFFORDSHIRE

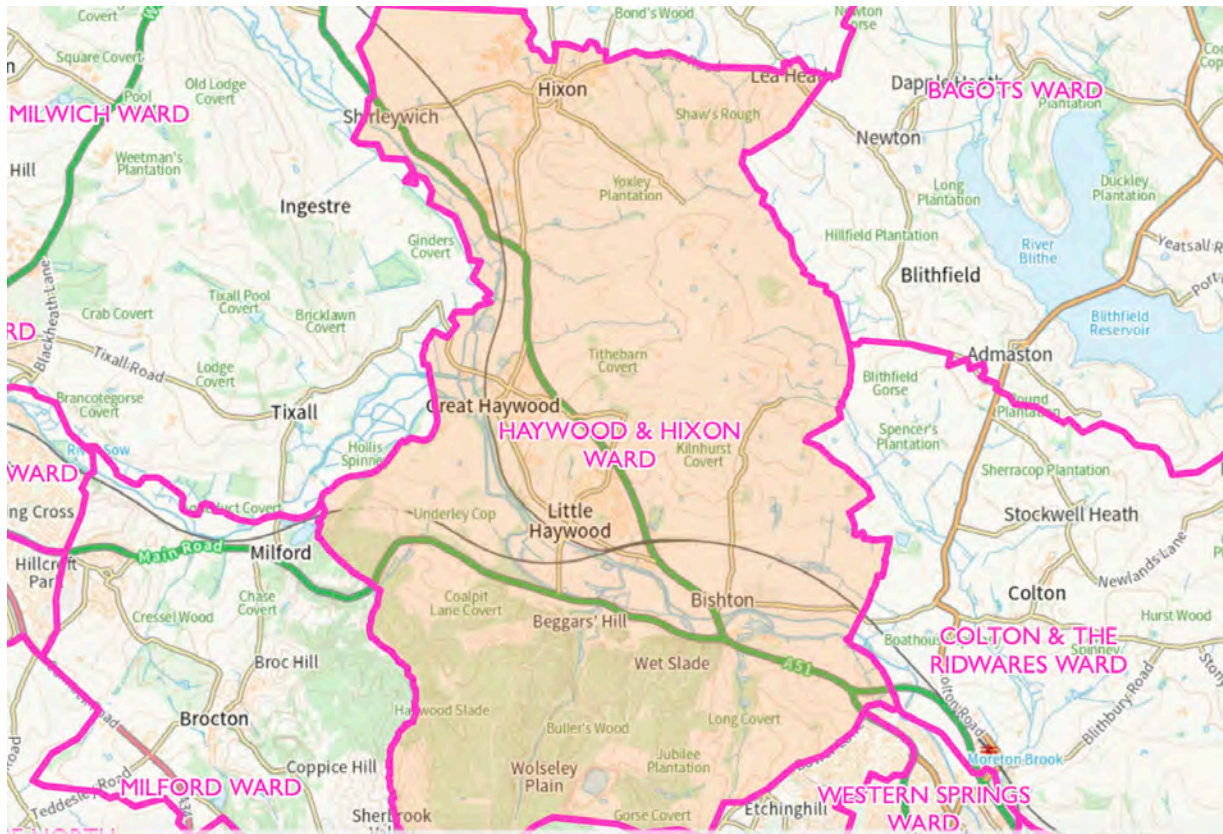
The purpose of this Education Landscape Review is to establish whether there is currently sufficient capacity in local schools for the pupils expected to be living on this development site, both currently, and in the future.

This is in relation to a development of circa 90 residential dwellings on land in Hixon, Staffordshire, shown below in Map 1:



Map 1: Approximate Development Site

The development is within the Haywood and Hixon Ward (“the Ward”) within the Stafford Borough Council (“SBC”) planning area. The Education Authority for the area is Staffordshire County Council (“SCC”). The Ward boundaries can be seen below in Map 2:



Map 2: Haywood & Hixon Ward Boundary

SBC does not currently operate a Community Infrastructure Levy (“CIL”). It is stated on their website¹:

Stafford Borough Council started to develop a CIL charging schedule in 2015 but it was put on hold due to changes in Government policy. It is anticipated that the work will re-commence as part of the review of the Local Plan.

For a planning obligation to be acceptable it must be necessary. In respect of an education planning obligation, to be necessary, there must be an insufficient number of places to accommodate the forecast number of children seeking a school place forecast to arise from the proposed development to which the obligation is linked. Thus, the obligation must be linked to a change (upwards) in the official number of school places.

The necessity requirement dictates that there must be the equivalent increase of the Capacity and Admission Number of a school that would serve the development. The Capacity of a school is published differently depending upon its type. The Admission Number is the number

¹ <https://www.staffordbc.gov.uk/community-infrastructure-levy-cil>

of places for each age group. For a maintained school (maintained by the local education and children’s services authority) it is the Net Capacity, and for an Academy/Free School it is set out in the Funding Agreement with the Education Secretary of State. This obligation on the Council should be stipulated in the Section 106. The same principles should be applied to the SEN contribution, if it is deemed appropriate. “Improving” educational facilities is not appropriate use of planning obligations. Pre-existing deficits, upgrades and maintenance issues are funded from different sources.

This document will undertake the following tasks: firstly, it will look at the child yield multipliers utilised by SCC in order to ensure that they are appropriate for the area; second, it will look at the planning obligation cost multipliers utilised by SCC to ensure they are in line with the national averages and the Department for Education’s (“DfE”) Guidance, Securing Education Planning Obligations (November 2019) which is endorsed by MHCLG PPG Paragraphs: 007 Ref ID: 23b-007-20190315 and 008 Ref ID: 23b-008-20190315; finally, it will look at the Education landscape, in order to establish whether planning obligations are appropriate and required under the CIL Regulations, specifically the tests of CIL Regulation 122. This note looks specifically at Primary and Secondary School provision (including Sixth Form), Early Years, and SEN provision, as SCC is likely to consider the need for funding towards all of these Educational elements.

To first discuss the child yield multipliers utilised by SCC:

Child Yield

Staffordshire County Council adopted their Education Infrastructure Contributions Policy² in March 2021. This Policy includes their most recent child yield multipliers, which are reproduced in the Table below:

Area	PPR per dwelling per Year Group		PPR per dwelling
	Primary	Secondary	Sixth Form
Stafford	0.03	0.03	0.03
	$0.03 \times 7 = 0.21$	$0.03 \times 5 = 0.15$	0.03

Table 1: SCC Child Yield Multipliers for the SBC Area

² <https://www.staffordshire.gov.uk/Education/Schoolsandcolleges/PlanningSchoolPlaces/Information-for-developers/Planning-policy.aspx#Introduction>

Stafford's child yield multipliers are the average for the county, with Cannock, Lichfield, and Tamworth seeing high expected yields. Utilising the child yield multipliers shown above in Table 1, against a development of circa 90 dwellings would generate the following:

- $90 \times 0.21 = 19$ Primary School aged children (3 per Year Group);
- $90 \times 0.15 = 14$ Secondary School aged children (3 per Year Group); and
- $90 \times 0.03 = 3$ Sixth Form aged children.

Furthermore, SCC utilises a child yield of 0.09 pupils for early years, and 0.0042/0.0088 for Primary/Secondary SEN respectively. This would generate the following:

- $90 \times 0.09 = 8$ Early Years aged children;
- $90 \times 0.0042 = 0.38$ Primary SEN children; and
- $90 \times 0.0088 = 0.79$ Secondary SEN children.

In each of these cases shown above, the child yield numbers discussed can be considered the "worst case scenario", as this does not factor in any, for example, elderly residential accommodation, or one-bedroom dwellings; the more of any of these types of dwellings that reside on the development, the lower the child yield will be expected to be.

Net migration to new dwellings increases the number of pupils locally, but this need is predominantly focused in Reception Year in the Primary phase, and Year 7 in the Secondary phase. If a child is already in a Primary or Secondary School when they move on to this proposed development, they are very unlikely to change schools once habits have been formed. It is fair to say that a proportion of the children moving in to the new homes will already be in the school system, as a proportion of people moving in to new homes do not move far. There is also the consideration that a proportion of pupils will attend Independent Schools (there are at least 2 in Stafford, and 12 in the whole county). Therefore, the likely impact on the school system will be less than forecast, and should be focused in either Reception Year or Year 7, as any other year group would likely necessitate a change of school.

The DfE has produced best practice guidance entitled "Securing developer contributions for education". A key point in the Guidance is that pupil yield factors should be based on up-to-date evidence from recent local housing developments. It is assumed that SCC has taken this

in to account with their child yield multipliers. At its paragraph 15, the Guidance recommends costs to be based on the published ‘scorecards’. These are DfE published financial statements of school places delivered via extensions and new schools on an individual school and number of places basis, standardised to a regional factor of 1.00 and a common date. This is discussed further below.

EFM’s own forecast trajectory for this development is based on a different methodology and measures the likely number of new children resident. Of course, a proportion of households moving to new developments do not move very far and their children do not change schools. The EFM demographic model, also working at District level, identifies a 1-year peak, which initial work has suggested is greater than the SCC formula. SCC’s multipliers are broadly consistent with the averages of most EA’s across the UK, and are not excessive. In this instance, the EFM model serves merely to substantiate that the number of pupil places associated with this development from the education authority is reasonable; the SCC child yield fulfils these criteria.

Cost Multipliers

The current SCC Policy states the following costs are utilised by SCC:

Phase of Education	Mainstream cost multiplier per pupil including weighting
Early Years/Nursery, First and Primary (including Infant and Junior schools)	£17,450
Middle	£20,738
Secondary and High	£24,026
Sixth Form	£24,026

Table 2: Cost per Pupil Place in SCC’s administrative area

SCC’s average cost for a new primary school place in the latest (2021) scorecard (which is the Department for Education’s published list of school costs for all Education Authorities nationwide) is £20,481 per pupil place, with a new secondary school place at £24,800. On the basis of this, the figures in Table 2 can be accepted.

However, SCC has stated that their costs for building a new school in 2022 are the following:

Type of school	Size of school	Total Cost
First School	1FE	£ 6,141,359
First School	1.5 FE	£ 6,668,288
First School	2FE	£ 8,106,424
Primary School	1FE	£ 7,596,058
Primary School	1.5FE	£ 9,983,703
Primary School	2FE	£ 11,378,438

Table 3: SCC New School Costs

These figures place the cost of a new 2FE primary school at £27,091 per pupil place. This is 32% higher than the average new school cost per pupil recorded in the scorecard. There has been a 10% uplift in costs from the DfE to take in to account higher build standards (such as zero carbon) but even when factoring in inflation these costs seem on the high side.

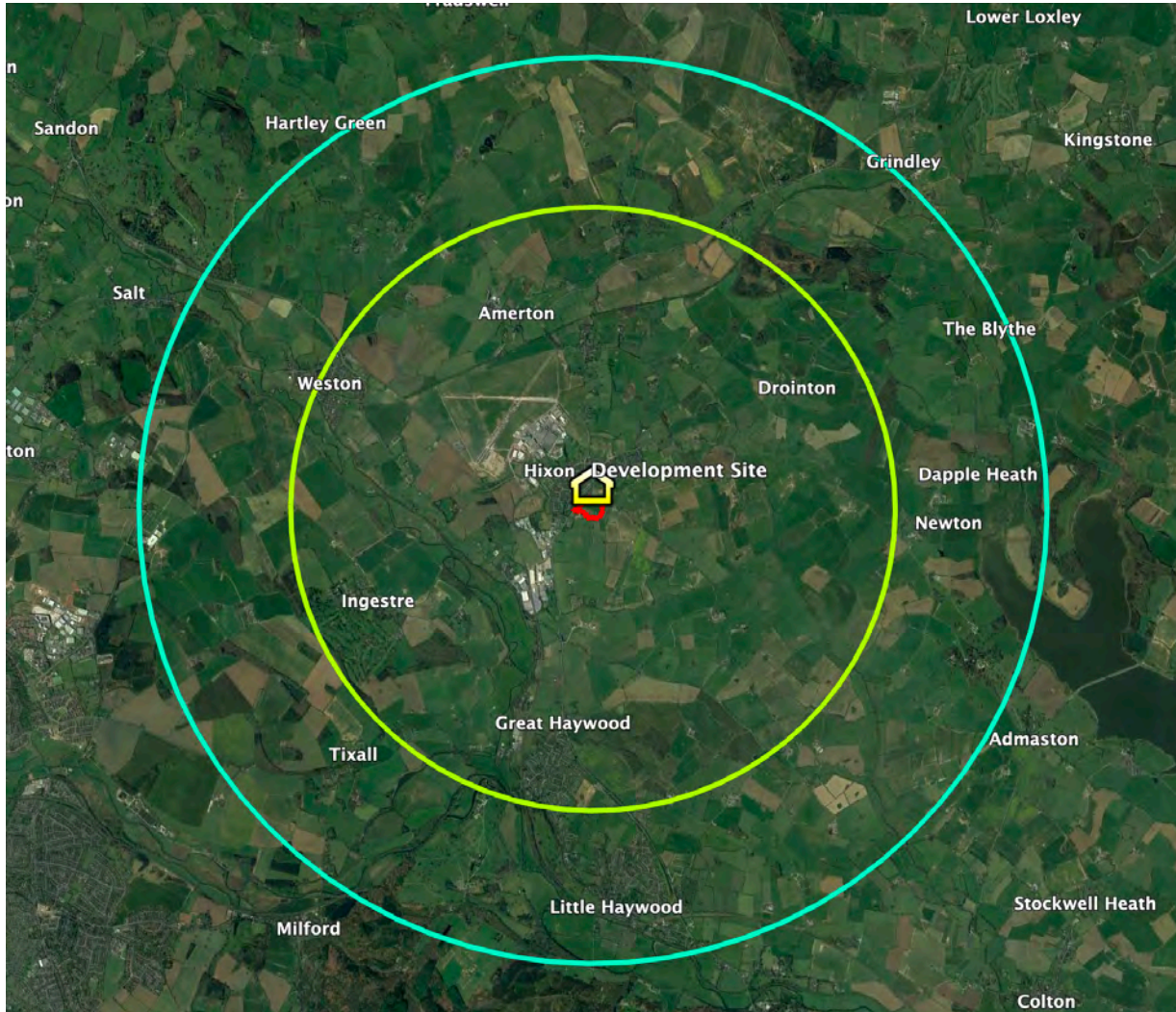
The remainder of this Report will look at the Education landscape in order to establish whether additional school infrastructure projects are necessary in order to mitigate the impact of this development:

Education

In our assessment, we consider all Primary Schools within a 2-mile walking distance³, and all Secondary schools that lie within a 3-mile walking distance of the development. The 2 and 3-mile criteria are the distances prescribed in the Education Act beyond which local authorities are required to provide/fund transport where the nearest available school is further away.

It is the intention of the planning system and the provision of state-funded schools that the ideal mode of travel to and from school is walking or cycling. The NPPF made this plain at paragraph 38. Paragraph 38 has been replaced by paragraph 106A in latest iteration of the NPPF (July 2021) with an exhortation to minimise the number and length of journeys. The words ‘within walking distance of most properties’ have been removed.

³ Distances have been calculated based upon coordinates near to the development (52.828087, -1.996104). Once the development is built out, some parts of the site will be further/closer than shown.



Map 3: Two- and Three-Mile Radius around the Development Site

The authority is required to make pupil forecasts to the Department for Education on a year of age basis by ‘school planning area’ and identify each school in the cluster and its capacity. The forecasts cover the period for which birth data is available. Forecasts covered by Section 106 agreements submitted separately to avoid double funding. For Primary School age pupils, the current published data runs to 2025/26 and for Secondary School aged pupils 2027/28. These are known as the School Capacity ("SCAP") returns. This is how Government allocates its funding for additional school places that are its responsibility to provide. The next publication of SCAP Forecasts (SCAP 2022) will be published in March 2023.

Schools should be operationally full to meet the financial audit requirement for best value from public assets. This is demonstrative of a properly functioning school system. School funding is predicated on the number of pupils that are on a school’s roll, so it is in the best

interest of schools to maximise intake within their capacity. Accordingly, many schools take from a wide catchment area and some enrol over capacity.

The statutory rules on enrolment are that whilst schools may have a catchment area and ordered criteria for admissions, the rules only apply if the school is oversubscribed. Otherwise, whoever applies is admitted irrespective of where they live. This is known as 'More Open Enrolment'. It fosters parental choice of school.

The overarching duty to provide sufficient schools and school places rests with central Government. (Education Act 1996 Section 11) The duty excludes those otherwise provided for (private education, home schooling, those in new housing with a Section 106/CIL in place (my emphasis)).

The education authority's duty in such matters is to secure sufficient schools and school places for their area (Education Act 1996 Section 14). 'For their area':

The duties of a [local] education authority do not require the authority to secure the provision of schools for pupils from outside the area of the authority, even though it may be convenient for a pupil to attend a school in an area other than that in which he lives.

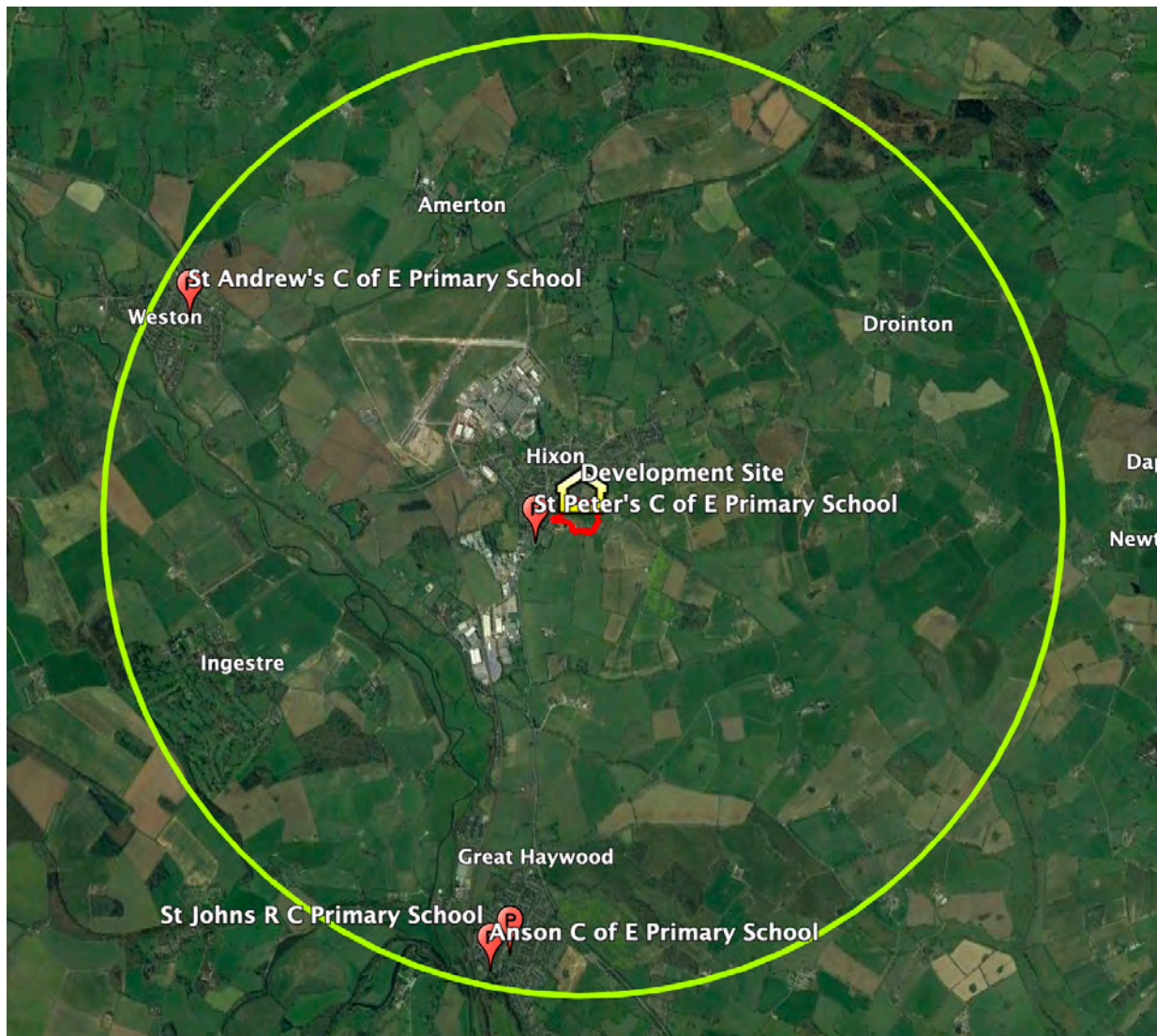
Within the State-funded school sector there are Community Schools funded by the local authority, and there are other providers than the local authority; these are Academies, Free Schools, the Voluntary Sector (e.g. Church Schools) and Foundation Schools. Academies and Free Schools are funded directly by Central Government; Church Schools and Foundation Schools are maintained by the local authority.

The provision of school places, where there is a shortfall, is made via a funding stream from the Department for Education ("DfE") is known as Basic Need. Basic Need funding is allocated as 'a number of pupil places times a unit cost', differentiated by school phase and local building costs. Allocations are made on the basis of projected shortfalls in local School Planning Areas against current pupil numbers and the actual numbers of school places in that Planning Area. Each planning area is treated as a discrete area and shortfalls met through the allocation of resources. A surplus in one school planning area is not offset against another with a shortfall. In this case, providing housing in the Stafford Rural 2 Primary Planning Area (for whatever planning reason) will be reflected in the forecasts for the Stafford Rural 2 Primary Planning Area, and nowhere else.

Primary Education

There are at least four independent, state funded, non-selective schools accommodating primary school aged pupils within a two-mile radius of the development site. However, only one of these schools is within an acceptable walking distance of the proposed new housing. All of the schools are within the SCC administrative area, and all are within the same planning area. Due to only one school being within an acceptable walking distance of the site, the remaining schools have been discounted.

The location of the schools in relation to the development site can be seen below in Map 4:



Map 4: Schools within a two-mile radius of the development site

The most recent school roll data in the public domain (2021/22 academic year) can be seen below in Table 4:

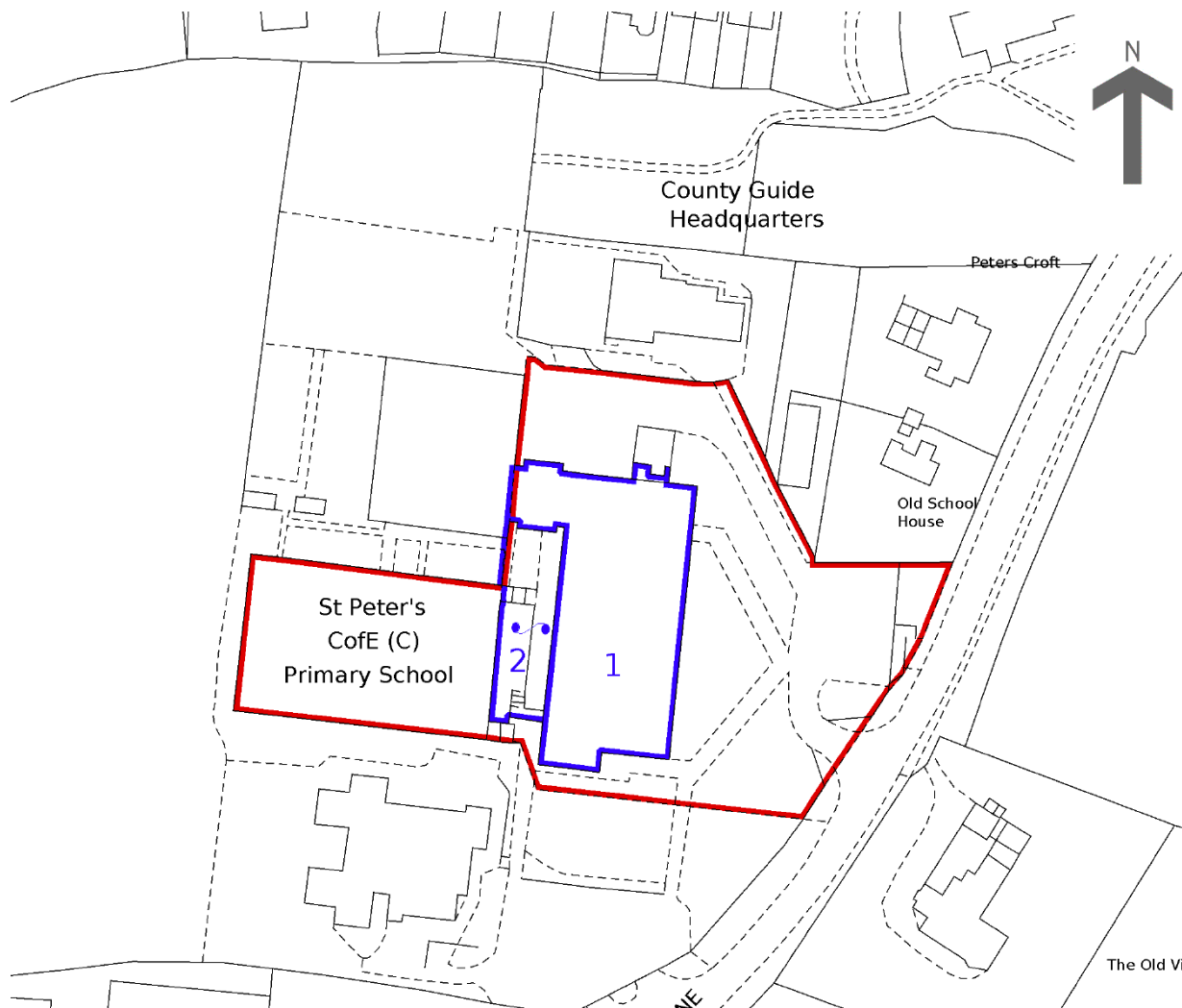
Primary School Name	Postcode	LA Name	Distance (miles)	Capacity	PAN	NoR	Yr R	Yr 1	Yr 2	Yr 3	Yr 4	Yr 5	Yr 6
St Peter's C of E Primary School	ST18 0PS	Staffordshire	0.3	196	28	162	27	21	28	30	26	18	12
TOTAL				196	28	162	27	21	28	30	26	18	12
Surplus							1	7	0	-2	2	10	16
Available Surplus %							4%	25%	0%	-7%	7%	36%	57%

Table 4: School Roll Data (January 2022)

PAN = Planned Admission Number; NoR = Number on Roll

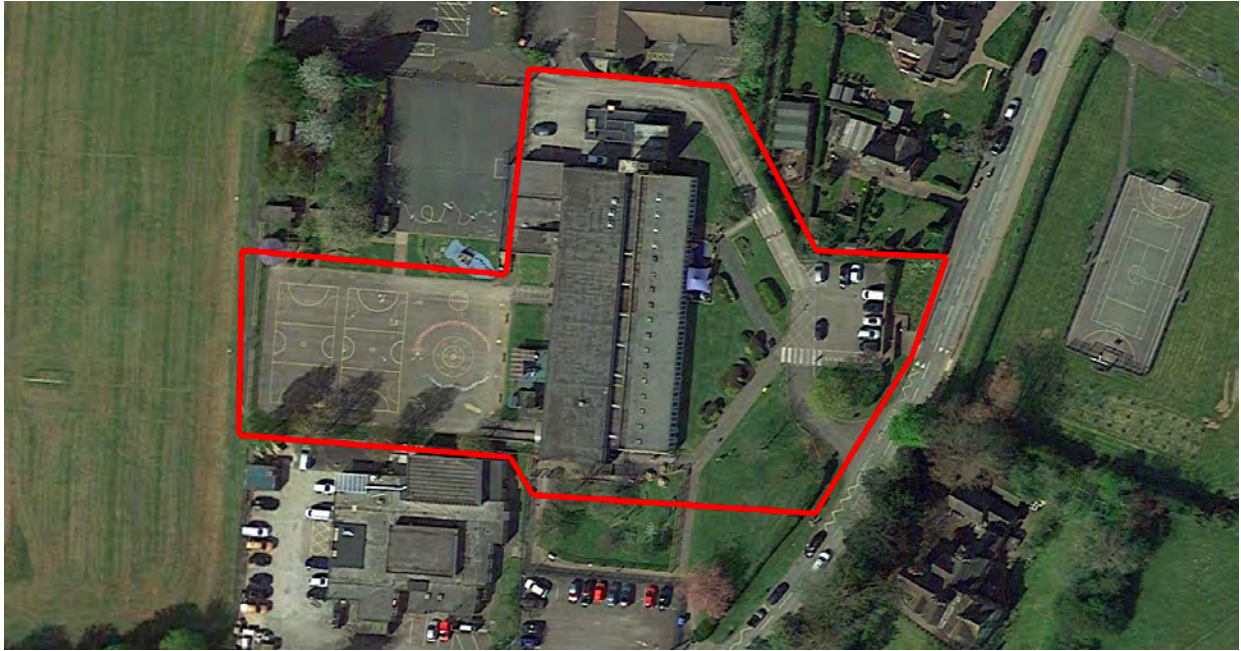
The only Primary School in Hixon is St Peter's C of E Primary School. This is almost a full 1FE Primary School (28 pupils per Year Group rather than a full 30) that, as of the previous academic year, was operating at 83% of its available capacity with 34 spare places. It should be noted that this development is forecast to generate a maximum of 19 primary school aged pupils. There is also a neighbouring development currently under construction for 30 dwellings that is expected to generate approximately 6 pupils when fully built-out. Therefore, there is sufficient capacity for the forecast pupils.

The school is on a site of approximately 0.75ha, as the Land Registry demonstrates:



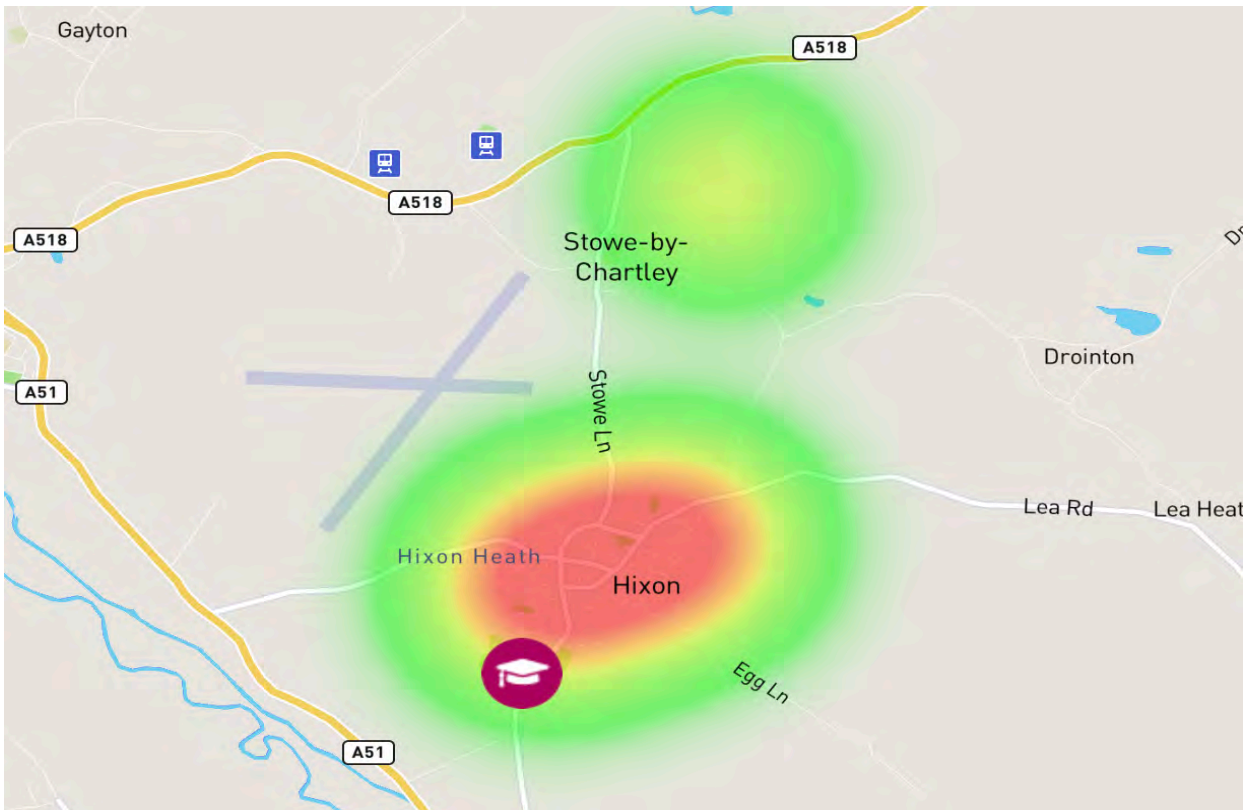
Map 5: St Peter's Primary School Site Boundary (via Land Registry)

0.75ha is on the small side for a school of this size (according to Building Bulletin 103), and does not suggest that a significant expansion is possible without acquiring additional land, although there is no suggestion that this will be necessary.



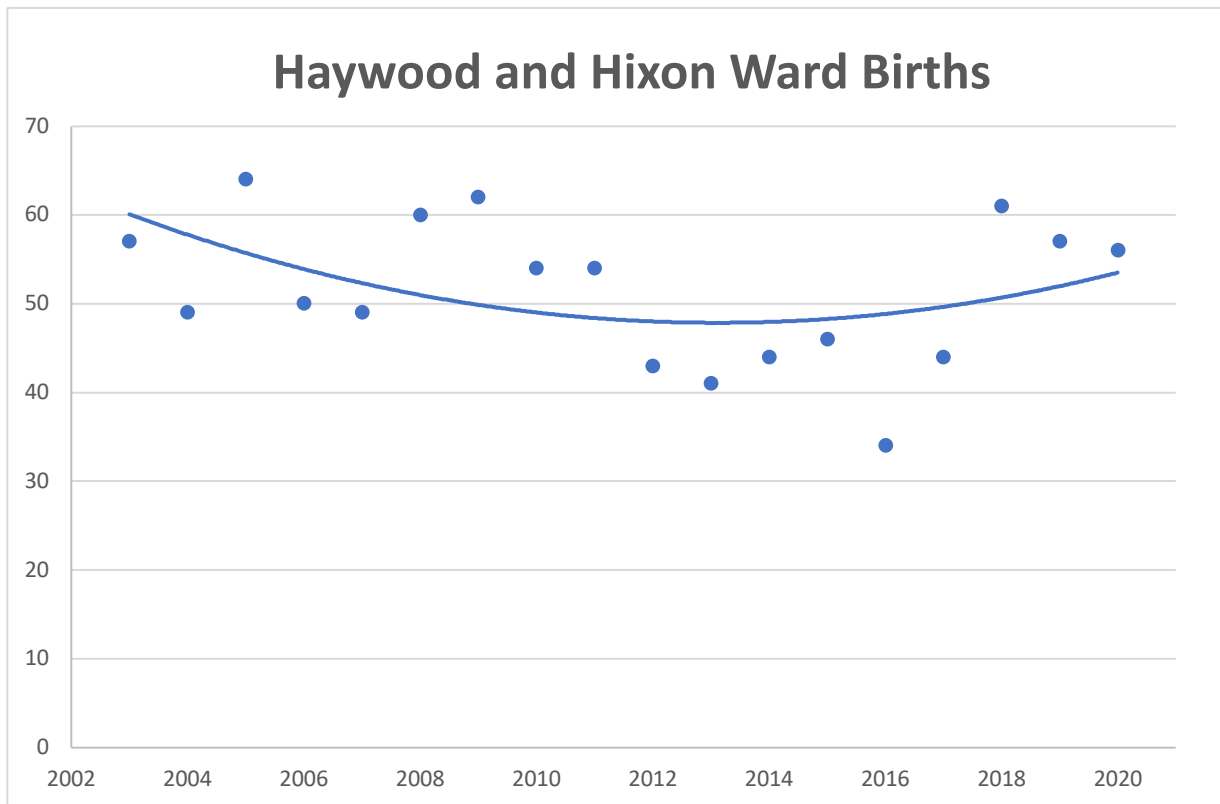
Map 6: St Peter's Primary School Site (via Google Earth)

When looking at the area that the school serves, it accommodates pupils predominantly from Hixon, with a small number from neighbouring Stowe-by-Chartley:



Map 7: St Peter's C of E Primary School Catchment Area Heat Map (via schoolguide)

When looking at birth numbers in the Ward, they have been falling from the recent peak in 2018, and are lower than they have been since their peak in 2005, as shown below, which suggests that capacity will be available for this development. This suggests that pupils from new development would help sustain the viability of the primary school if the demand for pupil places falls:



Graph 1: Ward Births

Turning now to the projections produced by SCC: St Peter’s C of E Primary School is grouped with four additional schools to form the Stafford Rural 2 Primary Planning Area. The schools have a combined capacity of 752 pupil places:

LA Name	School Name	School Places	Pupil on Roll	Primary Capacity	Secondary Capacity
Staffordshire	Colwich CofE Primary School	185	165	185	0
Staffordshire	St Andrew's CofE Primary School	196	156	196	0
Staffordshire	St Peter's CofE Primary School	161	141	161	0
Staffordshire	St John's Catholic Primary School	105	58	105	0
Staffordshire	Anson CofE Primary School	105	102	105	0

Table 5: Stafford Rural 2 Primary Planning Area Schools

In the 2020/21 academic year, the schools had a combined roll of 616, which equated to 136 spare places. The roll is not expected to change by the 2025/26 academic year, as shown in the Table below:

LA	Area Code 8606002
LA Name Staffordshire	Area Name Stafford Rural 2 Primary
Primary Change -2	

Year Group	Primary total
Actual 2021	616
Forecast 21-22	604
Forecast 22-23	623
Forecast 23-24	623
Forecast 24-25	628
Forecast 25-26	614

Table 6: SCC SCAP 2021 Forecasts

To summarise: there is sufficient surplus capacity now and forecast in the future to be able to accommodate the total child yield of this, and the neighbouring, development across the whole school.

Secondary Education

There are no state funded, independent, non-selective schools accommodating secondary school aged pupils within a three-mile radius of this development site. However, there is one school that serves Hixon that is just beyond this parameter – Weston Road Academy. This school is within the SCC administrative area, within the Stafford Secondary Planning Area.

The location of the school in relation to the development site can be seen below in Map 8:



Map 8: Secondary School in relation to the development site

The latest school roll data in the public domain can be seen in the Table below:

Secondary School Name	Postcode	LA Name	Distance (miles)	Capacity	PAN	NoR 7-11	Yr 7	Yr 8	Yr 9	Yr 10	Yr 11	Post 16
Weston Road Academy	ST18 0YG	Staffordshire	5.3	1,017	182	904	189	193	169	180	173	87
TOTAL				1,017	182	904	189	193	169	180	173	87
Surplus							-7	-11	13	2	9	
Available Surplus %							-4%	-6%	7%	1%	5%	

Table 7: School Roll Data (January 2022)

PAN = Planned Admission Number; NoR = Number on Roll

West Road Academy is a 6FE Secondary School approximately 5.3 miles walking distance from the development site. Due to the distance, SCC provides school transport:

Weston Road Academy - Service 11S, Colwich, Little Haywood, Great Haywood, Hixon, Select Bus

The wearing of a face covering is highly recommended on this local service bus.

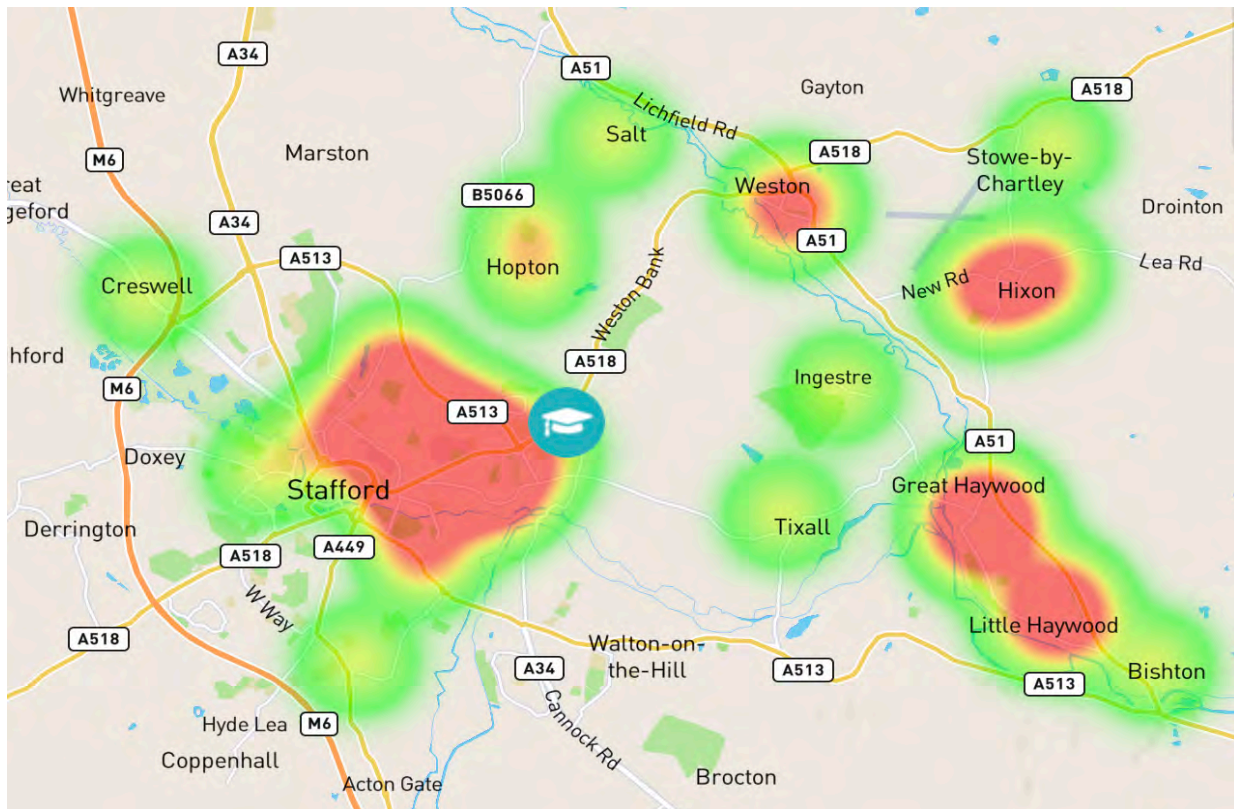
Timetable from 5 September 2022

Schoolbound - Colwich Church, Main Road, Little Haywood, Great Haywood, A51, Church Lane, Martin's Way, Hixon, New Road, A51, Weston, Green Road, Old Road, A518, Blackheath Lane, Weston Road Academy Bus Park.

Homebound - Weston Road Academy Bus Park, Blackheath Lane, A518, Old Road, Green Road, A51, New Road, Hixon, Martin's Way, Church Lane, A51, Great Haywood, Main Road, Little Haywood, Colwich, Main Road.

Weston Road Academy, as of the previous academic year, was full in Years 7 and 8, with minor capacity in higher Year Groups.

The school draws pupils from Hixon, Great and Little Haywood to the east of the school, and from the east of Stafford, as shown in the Map below:



Map 9: Weston Road Academy Catchment Area Heat Map

Weston Road Academy is grouped with five additional schools to form the Stafford Secondary Planning Area. The schools have a combined capacity of 5,931 pupil places:

LA Name	School Name	School Places	Pupil on Roll	Primary Capacity	Secondary Capacity
Staffordshire	Walton High School	1326	1332	0	1326
Staffordshire	Sir Graham Balfour High School	925	957	0	925
Staffordshire	King Edward VI High School	984	628	0	984
Staffordshire	The Weston Road Academy	1017	1002	0	1017
Staffordshire	Blessed William Howard Catholic School	1065	883	0	1065
Staffordshire	Stafford Manor High School	614	399	0	614

Table 7: Stafford Secondary Planning Area Schools

In the 2020/21 academic year, the schools had a combined roll of 5,211 pupils, which was 720 spare places. However, SCC forecast growth in Stafford of 714 additional pupils by 2027/28, meaning that the schools will be full. This is based on pupils that they already know of that are in the system, and does not account for new pupils from housing developments in Stafford, such as this one:

LA	Area Code 8606010
LA Name Staffordshire	Area Name Stafford Secondary
Secondary Change 714	

Year Group	Secondary total
Actual 2021	5211
Forecast 21-22	5360
Forecast 22-23	5516
Forecast 23-24	5603
Forecast 24-25	5736
Forecast 25-26	5817
Forecast 26-27	5871
Forecast 27-28	5925

Table 8: SCC SCAP 2021 Forecasts

SCC are well aware of the need for new secondary school provision. They state on their website⁴:

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 <https://www.staffordshire.gov.uk/Education/Schoolsandcolleges/PlanningSchoolPlaces/Stafford.aspx#Stafford>

It is understood that SCC plan to build a 5FE (750 pupils in years 7-11) secondary school. It is also understood that SCC do not currently have a site secured to deliver this provision. In the meantime, additional provision will be provided via expansion projects.

On the basis of the rising rolls and the fact that the nearest school to the development is predominantly full, it would not be unreasonable for SCC to request planning obligations towards the additional provision commensurate to the child yield. However, it is clear that there is no Secondary Education related reason for this development not to commence, as expansions and new provision is planned by SCC to accommodate the growing area.

Early Years

Under the Childcare Act 2006, local authorities have specific duties to secure:

- Sufficient and suitable childcare places to enable parents to work, or to undertake education or training which could lead to employment;
- Sufficient and suitable early years places to meet predicted demand; and
- Free Early Years provision for all 3 and 4-year olds (and more recently the 40% most vulnerable 2-year olds) of 15 hours per week 38 weeks per year.


The Childcare Act 2016 includes an extension to the current entitlement and, from September 2017, provides an additional 15 hours (per week 38 weeks per year) of free childcare for 3 and 4-year old children from working families who meet the following criteria:

- Both parents are working (or the sole parent is working in a lone parent family); and
- Each parent earns, on average, a weekly minimum equivalent to 16 hours at national minimum wage and less than £100,000 per year.

There is one private nursery in Hixon: Kids Planet Hixon, which accommodates 38 children:

Kids Planet Hixon 0.1 miles away

Horn End Cottage, Egg Lane, Hixon, Stafford ST18 0PR
Group/Owner Kids Planet Day Nurseries



Kids Planet Hixon Nursery is conveniently located in the village of Hixon, just east of Stafford. It is easy to access by road and has great public transport links for commuting parents. The nursery offers day care for children aged between 3 months...

[Read more about Kids Planet Hixon >](#)

Type of Nursery Day Nursery **38 Places**

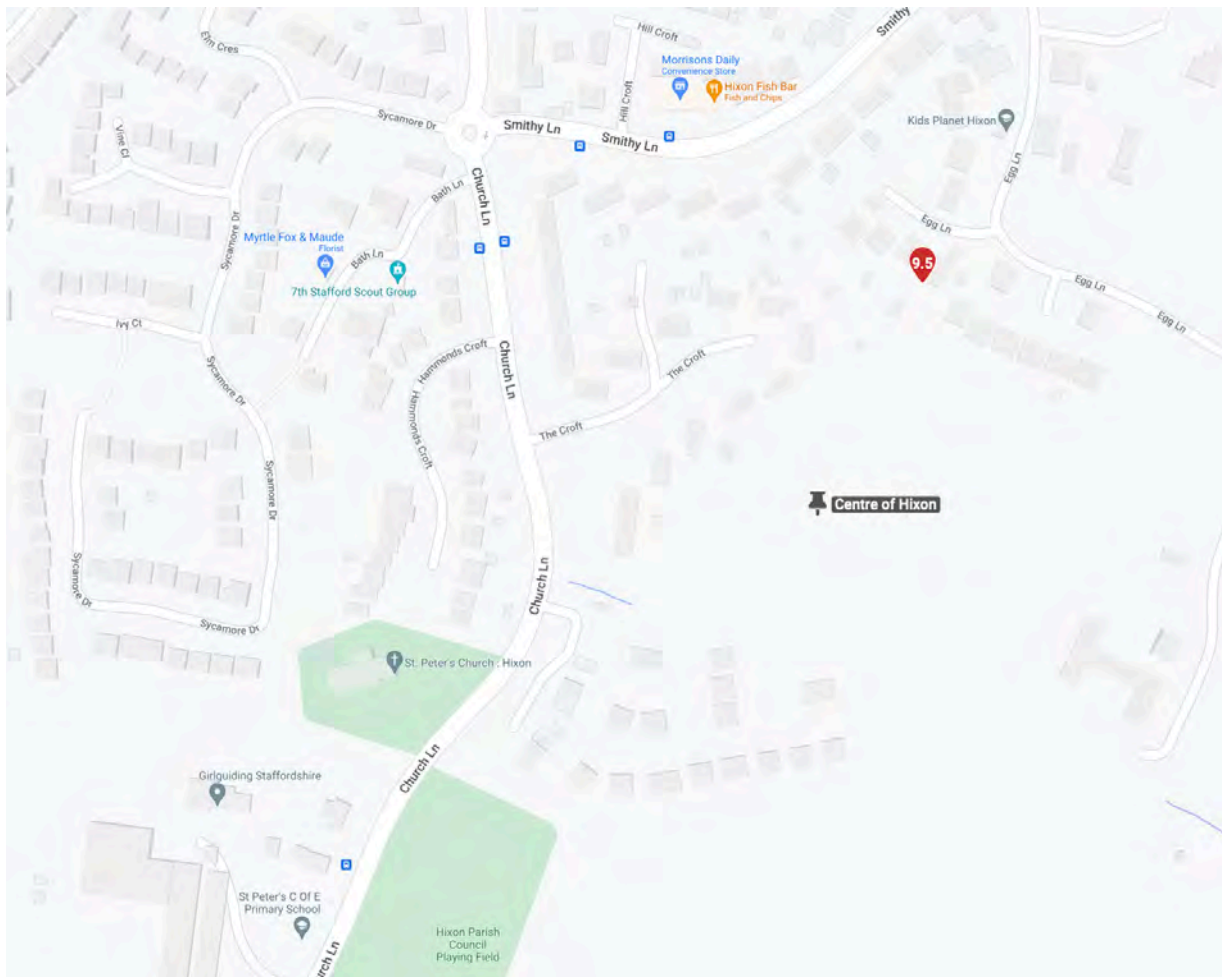
16 photos 1 video

7 reviews **9.5**

"Both my children have attended the nursery and benefited from the excellent care and experience at Kids Planet Hixon. The staff are..."

Save [View Full Details](#)

Table 9: Private Nursery in Hixon



Map 10: Location of Private Nursery in Hixon

If SCC can demonstrate that there is no available provision for the Early Years children expected to be resident on the development site, then planning obligations towards additional provision may be justified. Providing Section 106 planning obligations are forthcoming, there is no Early Years related reason for this development not to commence

SEN

The DfE states in their latest PPG on securing education planning obligations (November 2019):

We advise you to seek developer contributions for expansions required to sixth form and special educational needs and disabilities (SEN) provision, commensurate with the need arising from the development.

This demonstrates that the best practice guidance supports the requesting of SEN contributions if they are needed.

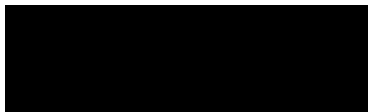
Government statistics suggest that in 2022 4% of children in the UK have an EHC plan/Statement of SEN (up from 3.7% in 2021)⁵. 12.6% of the UK's school age child population has some form of SEN but no EHC plan. Nationally, there is not sufficient SEN provision to accommodate the demand, which is growing.

There are not expected to be any pupils with Primary SEN on this development site, although it may be that SCC request funding towards one Secondary SEN pupil. This would be acceptable.

Summary

SCC may be justified in requesting planning obligations towards additional school provision. There is no education-related reason why this development cannot commence. Additionally, Education capacity is not a reason for the site not being allocated, and there are clear options available to SCC to manage school places via Section 106 planning obligation funding

Kind regards,



Ben Hunter

Associate Director – Education and Social Infrastructure

EFM

⁵ <https://explore-education-statistics.service.gov.uk/find-statistics/special-educational-needs-in-england>

Stafford Borough Local Plan 2020-2040: Preferred Options Consultation Form

How we will use your details

All representations received to the Stafford Borough Local Plan 2020-2040 Preferred Options consultation document will be included in a schedule and made publicly available once the consultation has closed.

We will consider all representations received, using them to inform the next stage of the process for the Stafford Borough Local Plan 2020-2040.

Comments cannot be treated as confidential. Your personal information, such as your postal and email address will not be published and signatures will be redacted, but your name and organisation will be made available. Comments will be made public and, because they are used to inform the development of policy, will not be able to be withdrawn once they have been processed and published. In addition, we will use your personal information to send you information on the Local Plan and associated planning policy matters.

Except where the law obliges or allows us, we will not further share your data with any external bodies or persons or with other departments within the Council.

We believe you should always know what data we collect from you and how we use it, and that you should have meaningful control over both. As part of our ongoing commitment to transparency, and in relation to current data protection legislation, we have updated our Privacy Policy.

We are the data controller and you can find information about how we handle your personal data by visiting www.staffordbc.gov.uk/local-plan-consultation-representations-how-we-use-your-personal-information and if you have any queries or would like to unsubscribe from receiving information then please contact strategicplanningconsultations@staffordbc.gov.uk.

By completing this consultation form you are agreeing to the use of your personal information in the way set out above.

Local Plan 2020-2040: Summary

The Local Plan sets out where new development can take place in the future across Stafford Borough and contains policies that the Council uses to decide planning applications. The new Local Plan will cover the years 2020 to 2040.

We are currently at the Preferred Options stage in the plan making process, with the Local Plan 2020-2040 due to be adopted in October 2024.

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): Sean Nicholson

Email (required): [REDACTED]

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): WSP Environment and Infrastructure Solutions UK Ltd on behalf of Bellway Homes Ltd in respect of Land at Land East of Church Lane and South of Egg Lane, Hixon.

Tick the box that is relevant to you:

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

[REDACTED]

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

[REDACTED]

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:

Please see attached response.

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:

Please see attached response.

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:

Please see attached response.

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:

Please see response attached.

Policy 12 of the Local Plan should be updated to reflect additional allocations required to meet the shortfall identified from Meecebrook and provide a more meaningful contribution towards meeting the adjacent HMAs' needs. These allocations should be in the larger settlements and should include Bellways land East of Church Lane and South of Egg Lane, Hixon

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:

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

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:

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:

Please see response attached.

There is a need for additional evidence in relation to Meecebrook, including the proposed railway station but also other fundamental issues relating to infrastructure, delivery and viability.

The site selection process should adopt an approach based on the position of settlements in the hierarchy, consideration of local housing need, informed by a housing need assessment by settlement, the planning merits of each of the shortlisted sites and consideration of whether or not their allocation is necessary (consistent with Paragraph 23 of the NPPF).

There is a need for additional work in relation to unmet needs arising from neighbouring areas.

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.

Please see response attached.

Going forward the consideration of the Site should be on the basis of the boundary provided, rather than the site considered as two parcels.

Land East of Church Lane and South of Egg Lane, Hixon should be allocated for housing. The Site is available, the promoter, Bellway is a housebuilder committed to bringing the site forward in the short term. This will assist the Council through delivery of market and affordable homes in a highly sustainable settlement. The site should therefore be allocated in the Local Plan.

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.

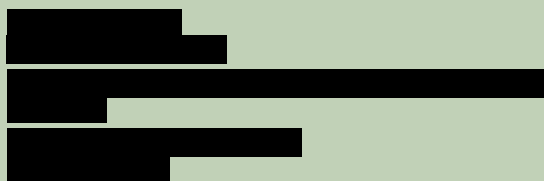


LAND AT CHURCH LANE HIXON



VISION DOCUMENT
AUGUST 2021

Prepared by:



On behalf of:



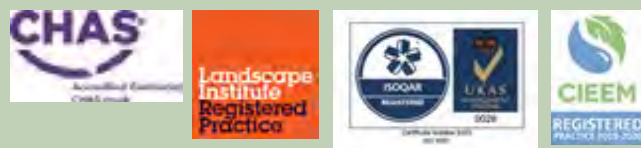
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	Date:	Prepared by:	Authorised by:	File reference:
1 st Issue	09/07/21	SP/JC	RR	CSA/5633/01/DRAFT
2 nd Issue	23/07/21	SP/JC	RR	CSA/5633/01/A
3 rd Issue	28/07/21	SP/JC	RR	CSA/5633/01/B
4 th Issue	30/07/21	SP/JC	RR	CSA/5633/01/C
5 th Issue	02/08/21	SP/JC	RR	CSA/5633/01/D
6 th Issue	09/08/21	JC	RR	CSA/5633/01/E



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Site Opportunities & Influences	9
Design Principles & Concept Masterplan	13
Delivery	17

Vision Statement

Our vision for the Land at Church Lane, Hixon, is to provide new homes in a highly sustainable location at the heart of the village. The scheme will link in with adjoining development and nearby facilities including primary school, sports pitches, play areas and local shops. The provision of new homes will support Hixon's role as a major employment location in Stafford Borough.

As well as market and affordable homes, the proposals will make use of previously developed land, provide new open space, habitats and a landscaped boundary to the southern edge of Hixon, and improve existing pedestrian and cycle links in this part of the village.

As a 5* housebuilder Bellway will provide high quality and attractive new homes, reflecting Hixon's vernacular, to help create a strong sense of place.

The development will be located in a sustainable location, and will ensure a safe and attractive environment for the new residents to call home.





Introduction

This Vision Document has been prepared on behalf of Bellway Homes, who are working with the landowner of the Site, to promote the land for residential development. The 3.95 hectare (Ha) Site presents an exciting opportunity to create a sustainable new neighbourhood to address the future housing needs of both Hixon and the wider Borough.

Planning and Strategic Context

Stafford Borough Council (SBC) is currently preparing a new Local Plan to help meet the need for homes, jobs and infrastructure through to 2040. In doing so, the Council is looking at various spatial options for growth and the availability of specific suitable, sustainable and deliverable sites.

This document therefore presents a vision for a new community at Hixon to inform further discussions with the Borough Council, Hixon Parish Council, the local community and key stakeholders. Bellway is keen to explore what benefits and investment could be realised alongside the provision of new market and affordable homes.

Hixon is a highly sustainable location for new development as the main location for strategic employment outside of Stafford. Complemented by its range of local services, including a primary school and shops, and with good public transport links, this designated Key Service Village presents clear opportunities to promote high levels of self-containment and reduce the need to travel by car.

Bellway's part-brownfield site lies at the heart of the village, within a short walking distance of the school, shops, playing fields playground and bus routes into Stafford. It can deliver both market and affordable homes, alongside open space, habitat creation and a new landscaped edge to the south of Hixon.

Structure of Vision Document

This Vision Document identifies the Site's opportunities, with an emerging concept masterplan to support further consultation and engagement. This has been informed by initial technical work assessing accessibility, transport, ecology, heritage and landscape.

This Vision Document sets out:

- An initial understanding of the Site and its local context;
- A summary of current Site assessment undertaken to date; and,
- The emerging key design principles and concept plan.

About Bellway

At Bellway, our aim is not just to build new houses, it is to create attractive and sustainable communities that leave a positive legacy for residents and the wider society. Our commitment to this is demonstrated by being awarded the coveted five star housebuilder award by the Home Builders Federation, as a result of emphasis on build quality, customer care and health and safety.





★★★★★
5 STAR HOME BUILDER
CUSTOMER SATISFACTION

HBF
HOME BUILDERS FEDERATION
2021

Bellway





1.5km from centre of Site

1km from centre of Site
Hixon Airfield Industrial Estate

New Rd

0.5km from centre of Site
Hixon

Lea Rd

Ego Ln

Hixon Industrial Estate

Church Ln

Pasturefields Industrial Estate

A51

Stafford

Hopton

Hixon

Ingestre

Great Haywood

Tixall

Walton on the Hill

M6

river Trent
West and Mersey Canal

CANNOCK CHASE AONB

A Sustainable Location

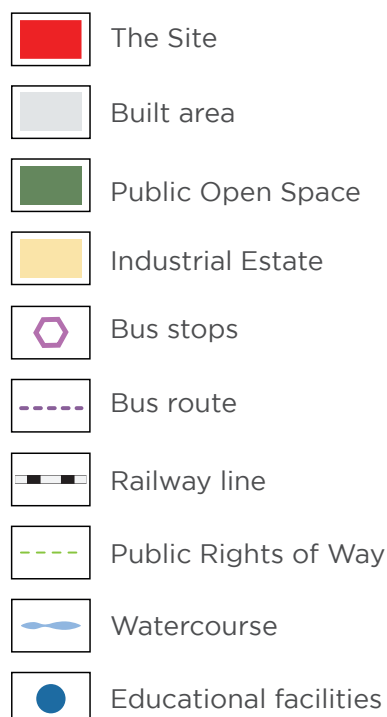
Hixon is large village and key employment centre to the east of Stafford.

Hixon's Unique Sustainability Credentials and Strategic Location

SBC's Local Plan Part 1 (adopted June 2014) designates Hixon as a Key Service Village, with such settlements considered to have the most potential for accommodating sustainable development, with good access to current and future services.

Significantly, Hixon has three of Stafford's Recognised Industrial Estates (Policy E3) – Hixon Industrial Estate, Hixon Airfield and Pasturefields, giving it a unique and distinct role in sustainability terms, complemented by a primary school, a designated area for 'Village and Neighbourhood Shops' and frequent bus services into Stafford.

This combination of employment, local retail and community facilities provides the opportunity for high levels of self-containment, reducing the need to travel, and providing Hixon with considerable advantages in delivering sustainable growth. Hixon should therefore have a key role to play in any spatial strategy through to 2040 and beyond.

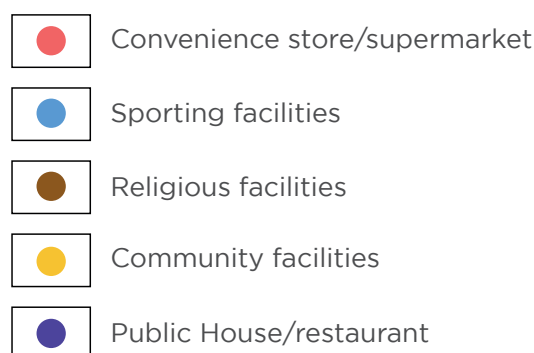


Sustainability and Deliverability of Land at Church Lane

As well as being a highly sustainable location for development within walking distance of the school, bus stops, employment and village shops, the Site is also part brownfield, supporting wider national policy objectives to prioritise development on previously developed sites. The precedent for development in this location is already well-established through previous decision making.

There are no policies or statutory designations affecting the Site and limited technical and environmental constraints, as explained in the following sections. A previous planning application for 50 homes on part of the Site reflected this, with no statutory or technical objections raised in the determination of that scheme. The only issue material to determination of that application was a policy one in that it was a scheme beyond the settlement boundary in the adopted Development Plan, however that plan is now undergoing review to cover a new period to 2040.

The Site also presents the opportunity to deliver wider benefits for Hixon, not just through the delivery of market and affordable homes, but through the provision of a new landscaped boundary to the south of the village, biodiversity enhancements, new open spaces and supporting wider access to the countryside. This would help to address the aspirations of the Hixon Neighbourhood Plan, which is seeking greater provision of open spaces and footpath networks, as well as habitats, including wildlife meadows.



The Site

The Site is well-enclosed with development to the north and west, and includes previously developed land which will be redeveloped as part of the proposals, comprising the dilapidated WWII hospital buildings. The Site adjoins a new housing scheme for 30 homes, accessed via Church Lane. This scheme has already been designed to accommodate further development in this location, safeguarding two routes to the north and east directly into the Site.

There are two mature oak trees which are covered by a Tree Protection Order (506-2008). These trees and other existing landscaping are predominantly found within the Site's boundaries or peripheries, and can be retained as part of any scheme and complimented with further planting.

Public footpath 'Hixon2' runs along the Site's western boundary and provides an invaluable link to Egg Lane, Church Lane and the local amenities.

The Site is not a designated or valued landscape and is visually well-contained given the presence of adjoining development and existing hedgerow boundaries. The Site falls away from 100-105m AOD at Egg Lane, to circa 80m AOD on its southern boundary which, alongside the Site's existing landscaping, helps to limit views from further afield.





LOCAL CONVENIENCES
SHOP, TAKEAWAYS, BARBERS

Public Footpath(PF)

Smithy Ln

HORN END NURSERY

EGG LANE ALLOTMENTS

Hixon Ln

PF 'Hixon2'

Egg Ln

The Site

30 Homes currently under construction

WWII DERELICT HOSPITAL BUILDINGS

TREES PROTECTED BY TREE PRESERVATION ORDER (506-2008)

Church Ln



The Site, Immediate Context & Facilities

Site Opportunities & Influences

Preliminary planning, environmental and technical assessments have been undertaken to inform this Vision Document, the findings of which are summarised in this section. This work highlights the opportunities to deliver a high-quality, well-designed and sustainable development in this location. It is clearly a deliverable site with no significant constraints to the delivery of much-needed new homes.

Accessibility and Highways

Hixon's and the Site's specific sustainability credentials as a location for new homes are outlined in the previous 'A Sustainable Location' section of this document. The provision of new homes in what is an important employment location, on a site which is well-connected in proximity to jobs, shops, a primary school, recreation and public transport presents clear opportunities to reduce the need to travel by car and deliver a truly 'walkable' community, with key services and bus stops within 400m. The Site's location at the heart of the village is therefore a significant advantage in sustainability and accessibility terms. The scheme can tie in with existing routes, specifically PRow Hixon 2 - which runs along the site's western boundary and connects on to Church Lane and Egg Lane - and deliver wider improvements to key routes where required.

Vehicle access can be secured via the adjoining housing scheme, providing direct access on to Church Lane, with the opportunity to provide an emergency access on to Egg Lane, if required.

Landscape & Visual

The Site provides an opportunity to deliver homes in a part of Stafford Borough beyond the Cannock Chase AONB and other more sensitive landscapes. SCC's 'Planning for landscape change' shows that the Site is outside of the very high and highly sensitive landscapes, in an area of moderate landscape sensitivity where opportunities to encourage small-scale landscape improvements can be considered - such as hedgerow maintenance, habitat creation and tree planting - all things that can be incorporated as part of the masterplanning for the Site.

As explained previously, the Site is visually well-contained given its topography, adjoining development and existing boundary planting, and presents a further opportunity to enhance the appearance of this area through the removal of the dilapidated and unsafe buildings and new landscaped boundary on the Site's southern edge.

Ecology

There are opportunities to provide improved habitat provision as part of any scheme and secure a net gain in biodiversity, on a site which at present is unlikely to have significant ecological interest. New planting and habitats would complement and reinforce the existing hedgerows and tree planting which sit towards the edge of the Site. There is also the opportunity to open up the existing culvert which, alongside the provision of new ponds as part of the sustainable drainage network, can deliver further benefits for wildlife. The ability to deliver net gain is supported by the extent of land which Bellway controls in this location, which includes land beyond the Site's immediate southern boundary. Net gain is therefore a deliverable and realistic prospect.

Flooding and Drainage

The Site is sequentially preferable lying outside of the EA's flood risk zones. A supporting technical note - Flood Risk and Drainage Feasibility - identifies the opportunity to provide sustainable drainage features and open up the existing culvert as part of an attractive green corridor on the southern part of the site, providing new habitats and recreational routes for existing and future residents. As the lower lying part of the Site, the route of the culvert is also an area of surface water flood risk, so no development is therefore proposed here.



Heritage

There are no designated heritage assets on the site. Whilst the site lies to the east of the Grade II listed St Peter's Church, its setting can be reflected as part of the masterplan, providing views towards the church to support the appreciation of this asset. The former WWII buildings to the south east of the site are non-designated assets of low historic significance. Whilst these are of some local interest they are dilapidated and unsafe – re-using or converting these buildings is unlikely to be feasible. Nevertheless, as proposals progress, the key features of the buildings can be recorded for posterity, and an information board could be provided as part of the scheme to highlight the site of this local historic interest. Further details are provided as part of the accompanying Heritage Appraisal which assesses the Site's relationship with heritage assets and archaeology in this location.

Summary of Opportunities and Constraints

The specific features and characteristics of the Site described in the preceding pages have been drawn together to prepare an initial Opportunities and Constraints Plan for the Site. These are illustrated in on pages 11 and 12, and are summarised below:

Opportunities

- Provide new market and affordable homes in a sustainable location supporting Hixon's role as a key employment location in Stafford Borough.
- Making use of existing ped/cycle connections on to Church Lane and Egg Lane via the PROW which routes along the Site's western boundary, which link to all of the local facilities and bus stops.
- Provision for new vehicular access points taken from the adjacent development. A potential pedestrian/emergency access can be provided on to Egg Lane to the north east if required.
- Opportunity to provide an avenue of tree planting through the development, to frame views towards St Peters Church in the South west.
- Opportunity for a new area of public open space within the southern parts of the Site. This area could be enhanced with native wildflower planting, a community orchard, wildlife pond and natural children's play area. This area will also create a strong green edge to the development.
- Opportunity to provide a range of ecological enhancement measures to maximise the Site's biodiversity value. Enhanced green corridors within and around the boundaries of the Site to improve wildlife connectivity. Incidental greens will allow for the retention of existing trees within the proposals.
- To provide sustainable drainage basins, which will form an integral part of the development's green infrastructure, providing ecological benefits and habitat creation. There is also the opportunity to open up part of the culvert in places, to improve drainage and provide habitat benefits.

Influences

- Assessing the feasibility of opening up parts of the culvert, which runs at the low point of the Site, to create an attractive green corridor through this area.
- The public footpath which runs along the Site's western boundary will be retained along its current alignment within a green corridor.
- The two trees covered by the TPO orders will need to be retained within the proposals and protected during any future construction works.

Opportunity to set new homes back from the public footpath and existing houses to respect their setting and to create an outward looking development, overlooking areas of public open space.

Opportunity to retain views across the Site towards St Peter's Church. Orientating the road and enhancing with new landscaping will help frame these views.

The low point of the Site provides the opportunity for a SuDS basin to manage and store the flow of surface water.

Opportunity to utilise and tie the new recreational routes with the existing public footpath, connecting directly to Church Lane.

Potential vehicular access point to be taken from the adjacent development, which is currently being constructed.

30 Homes Currently Under Construction

Opportunity to provide a pedestrian and cycle link to the adjacent scheme creating a connected and coherent development.

Opportunity to provide vehicular access to White Barn to be retained and facilitated through the internal street layout.

Potential for a children's play area, to be accessible for new and existing residents of Hixon. This location could also provide an area for ecological enhancements, orchard and a link to the historic WWII buildings on the site. This area will also create a strong green edge to the development.



Potential combined pedestrian, cycle and emergency access point onto Egg Lane, providing a link to the allotments to the north east of the Site.

Egg Lane Allotments

Incidental pocket greens will create a break in built in development and help strengthen the view corridor towards St Peter's Church, as well enabling the retention of existing trees.

Opportunity for new boundary planting will help set the development in a strong green framework, providing wildlife corridors and support its visual containment.

OPPORTUNITIES & INFLUENCES PLAN

Site boundary: **Aprx. 3.95ha**

Opportunities

- Potential vehicular access point
- Potential secondary access point
- Potential emergency access point
- Potential pedestrian and cycle links
- Potential primary vehicular routes
- Potential building frontages
- Potential public open space
- Potential location for SuDS
- Potential location for an orchard and ecological enhancements
- Opportunity to provide structural boundary vegetation
- Opportunity to retain views to St Peter's Church & the wider countryside beyond
- Potential location for play provision

Influences & Context

- Existing contours
- Existing vegetation
- Tree Preservation Orders (TPO)
- Public SW gravity sewer (3m easement)
- Public foul gravity sewer (scope to divert)
- Existing watercourses
- Route of existing culvert/pipe (8m easement)
- Respect the privacy and amenity of existing dwellings
- Existing Public Rights of Way
- World War II Hospital building (Non-Designated)
- Local road network and bus stops

Retained access to White Barn

Design Principles & Concept Masterplan

Initial Concept Masterplan

Drawing upon the assessment of the Site's Opportunities and Influences, an initial Concept Masterplan has been prepared to illustrate how a sustainable, high quality new neighbourhood can be readily accommodated at the Site.

The development can provide high quality, sustainable and sensitively designed new market and affordable homes, which create a locally distinctive development which draws upon the local vernacular.

Land Use and Density

The Site is anticipated to accommodate circa 2.50ha of residential development, which equates to approximately 90 new homes at an average density of 36 dwellings per hectare (dph). This will ensure an efficient use of the Site whilst providing green space to respect the setting of the adjacent houses, as well as to ensure a comprehensive network of green infrastructure within the development.

The provision of new landscape boundary planting, as well as new landscaping within the recreation and wildlife areas will significantly increase the level of hedgerows and trees on the Site, improving wildlife connectivity and habitat creation.

The development could also explore the opportunity to open up part of the culvert to further enhance this green corridor. This could form a heart to the new neighbourhood, and provide social and environmental benefits to new and existing residents.



Movement

The existing public footpath through the Site will be retained along its current alignment, and set within a green corridor to create an attractive walking route. New recreational routes within the development's green spaces will link to this footpath, to create a comprehensive network of walking routes, which are located close to all the new homes and will better connectivity and sustainable travel options to Hixon and the surrounding area.

The proposed development will be accessed via two new access points from the adjacent development in the south, with a potential emergency vehicular, pedestrian and cycle access point taken from Egg Lane to the north.

A new tree-lined main street would lead through the development, which would aid in creating a legible and permeable layout within the Site, as well as framing views towards St Peters Church. Secondary streets will lead off the main street, and will serve private drives, courtyards, and lanes, to ensure a varied character within the development, and a clear hierarchy of movement routes.

Design

The publication of the 'Building Beautiful Places' Plan is at the centre of change within the UK Planning system. The NPPF has recently been updated to ensure that "beautiful, environmentally sustainable, and life-enhancing communities" are created. This means good quality design is paramount, with local communities put at the very heart of decision-making to help shape the places they live.

Bellway are therefore keen to work with the local community and other stakeholders to provide a high quality, well-designed scheme which everyone can enjoy, sympathetically designed to reflect the Site's village location and local vernacular.

Green Infrastructure

The Concept Masterplan demonstrates how nearly 40% of the development will deliver an extensive green infrastructure framework to conserve and improve the existing landscape features, and establish a variety of new landscaped areas with recreational routes and wildlife habitats.

These areas of green space include:

- Traffic-free pedestrian routes which will meander through the open space, linking to the public footpath and onto the amenities Hixon has to offer, supporting active lifestyles for both new and existing residents alike.
- Retention of the existing trees within incidental green spaces, in particular those covered by Tree Preservation Orders, as well as setting hedgerows and the public within new publicly accessible open space.
- Green corridors located alongside the Site's boundaries to set the new homes within a green framework.
- A large area of public open space within the southern part of the development, to include play opportunities as well as space for informal recreation, such as pic-nicking.
- This area will be set aside for recreation uses and wildlife enhancements. Potential for native wildflower planting and an orchard. Part of the culvert could be opened to provide further habitat creation and recreation potential. Interpretation boards could be installed to highlight the local and national significance of this area and will be accessible to all. This area will also create a strong green edge to the development.
- The higher land in the north east offers views down the valley towards St Peters Church and beyond and it is proposed that an avenue of street trees will be planted along the primary street to frame this view. A pocket green and children's play space within this corridor will break up the built development and create an attractive space to use.
- New native planting throughout the open spaces, including specimen trees, thicket planting and wildflower grassland, orchards and wildflower meadows will contribute to the Site's green infrastructure.
- National planning policy requires schemes to provide net gains in biodiversity. Given the quantum of development promoted, there is clear scope for ecological enhancements.



New homes set back from the public footpath and houses along The Croft, planted with new tree and hedgerow planting. Recreational routes will link into the existing public footpath to help promote better connections. This route will also frame views toward St Peter's Church to the South west.

Proposed internal street layout and avenue tree planting will help retain and enhance views across the Site towards St Peter's Church. Small incidental pocket greens will allow for the retention of existing trees.

Proposed location for a SuDS basin can be designed to provide wildlife and habitat benefits forming an integral part of the site green infrastructure offering.

Proposed vehicular access point to be taken from the adjacent development, which is currently being constructed.

Potential pedestrian and cycle link onto Church Road, to run alongside the public footpath.

Grade II Listed Building
SAINT PETER'S CHURCH

Potential pedestrian and cycle link into the adjacent scheme, creating a connected and coherent layout.

30 Homes Currently Under Construction

HIXON PARISH COUNCIL PLAYING FIELDS

Vehicular access to White Barn to be retained and facilitated through the internal street layout.

Wildlife Pond



New homes located here will have deeper rear gardens and new tree and thicket planting to respect the adjacent houses along Egg Lane.



















Potential combined pedestrian, cycle and emergency access point onto Egg Lane, providing a link to the existing allotments to the north east of the Site.

Proposed central area of green space will create a break in built in development and help strengthen the view corridor towards St Peter's Church. It will also include a small children's play area to help form a focal point to the development.






New boundary planting will help set the development in a strong green framework, providing wildlife corridors and support its visual containment.

Proposed recreation and wildlife area will make reference to the former WWII hospital buildings (eg. interpretation boards). This area could potentially be enhanced with native wildflower and orchard planting, and natural children's play. This area will help create a strong green edge to the development and will allow for a part of the existing culverted ditch to be opened up to create additional wildlife benefits.

CONCEPT MASTERPLAN

-  Site Boundary: **Aprx. 3.95ha**
-  Potential vehicular access point
-  Potential secondary access to serve southern residential parcel
-  Potential emergency access point
-  Proposed residential area: **Aprx. 2.50ha (Up to 90 dwellings)**
-  Potential public open space, thicket, tree and wildflower planting
-  Potential orchard and wildlife area
-  Potential location for children's play provision
-  Potential location for sustainable drainage features with new habitats
-  Potential primary street
-  Potential secondary streets within the development/ shared surface
-  Potential lanes and private drives
-  Avenue tree planting (Frame views across the development)
-  Public realm/ shared surface
-  Potential pedestrian and cycle routes
-  Potential pedestrian and cycle links

Influences & Context

-  Existing vegetation
-  Tree Preservation Orders
-  Existing Public Rights of Way
-  Local road network and bus stops
-  Retained access to White Barn

Delivery

Land at Church Lane, Hixon provides a viable, sustainable and logical opportunity to help the Council fulfil its housing needs. Our proposals for the Site have carefully considered the economic, social and environmental dimensions set out in the NPPF, and respond to the technical opportunities and constraints of the Site.

Through this Vision Document, it has been demonstrated how the Site has the potential to support a sustainable residential development:

- **The Site is within the control of a landowner who is committed to progressing a proposal as soon as possible;**
- **In Bellway, the Site has the benefit of a house builder with the necessary experience and expertise to successfully guide a proposal through to implementation;**
- **The Site is in a highly sustainable location in relation to Hixon's services and facilities, and there are opportunities for sustainable means of travel into the village centre, and also beyond to larger towns; and**
- **There are no technical impediments or environmental constraints that could not be addressed through a sensitive and successful design, to deliver a high quality pro-posal in this location.**

The Site is deliverable. Bellway would welcome continued discussions with the Council and other consultees in the planning process, as we look to realise this exciting development opportunity, and deliver a carefully integrated and sustainable extension to Hixon.





Egg Ln

Hixon

The Site

From: Jessica Graham [REDACTED]
Sent: 12 December 2022 10:28
To: Strategic Planning Consultations
Cc: [REDACTED]
Subject: Bellway Homes (Little Haywood) - Response to Preferred Options Consultation Email 1 of 2
Attachments: Bellway (Little Haywood) - Preferred Options Consultation Response 12-12-22.pdf; Bellway (Little Haywood) - Haywood Vale Vision Document.pdf; Bellway (Little Haywood) - Joint Meecebrook Rail Station Review v3.pdf

EMAIL 1 of 2

Dear Sir / Madam,

On behalf of Bellway Homes, please find attached their response to the Local Plan Preferred Options consultation in relation to their land interests in Little Haywood.

The following documents are attached to this response:

- Consultation Response Form;
- Haywood Vale Vision Document;
- EFM Education Report (November 2022);
- EDP Landscape Technical Note (November 2022);
- EDP Heritage Technical Note (November 2022);
- EDP Ecology Technical Note (November 2022); and,
- Intermodality 'Meecebrook Rail Station Review' (December 2022).

Due to the size of the supporting documents, we have submitted them across 2 emails. This email has the consultation response, vision document and joint rail station review attached.

Please can you confirm receipt of this representation and both emails?

Kind regards,

Jess

Jessica Graham MRTPI
Associate
Planning





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[Redacted content]

We are registered with the Scottish Letting Agent Register, our registration number is LARN1902057.

Please note any advice contained or attached in this email is informal and given purely as guidance unless otherwise explicitly stated. Our views on price are not intended as a formal valuation and should not be relied upon as such. They are given in the course of our estate agency role. No liability is given to any third party and the figures suggested are in accordance with Professional Standards PS1 and PS2 of the RICS Valuation –Global Standards (incorporating the IVSC International Valuation Standards) effective from 31 January 2022 together, the "Red Book". Any advice attached is not a formal ("Red Book") valuation, and neither Savills nor the author can accept any responsibility to any third party who may seek to rely upon it, as a whole or any part as such. If formal advice is required this will be explicitly stated along with our understanding of limitations and purpose.

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From: Jessica Graham <[REDACTED]>
Sent: 12 December 2022 10:28
To: Strategic Planning Consultations
Cc: [REDACTED]
Subject: Bellway Homes (Little Haywood) - Response to Preferred Options Consultation Email 2 of 2
Attachments: Bellway (Little Haywood) - EDP Heritage Note.pdf; Bellway (Little Haywood) - EDP Landscape Note.pdf; Bellway (Little Haywood) - EFM Education Landscape Assessment.pdf; Bellway (Little Haywood) - EDP Ecology Technical Note.pdf

EMAIL 2 of 2

Dear Sir / Madam,

Following our earlier email (1 of 2) with the consultation response, vision document and joint Meecebrook rail station review attached, please find attached the remaining documents to support Bellway's submission.

The following documents are attached to this email:

- EFM Education Report (November 2022);
- EDP Landscape Technical Note (November 2022);
- EDP Heritage Technical Note (November 2022); and,
- EDP Ecology Technical Note (November 2022);

Please can you confirm receipt of the attached and earlier email?

Kind regards,

Jess

Jessica Graham MRTPI
Associate
Planning



 Before printing, think about the environment



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Contact Details

Full name (required): Michael Davies

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

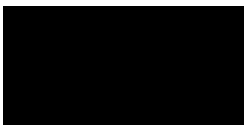
Organisation or Company Name (if applicable): Savills (UK) Limited on behalf of Bellway Homes

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)

No

Policy 1 Comments:

Policy 1 - Part A (Housing Requirement)

Policy 1 states that provision will be made for 10,700 dwellings (535 dwellings each year) between 2020-2040. Paragraph 1.2 of the supporting text states that the local housing need for the Borough is 435 dwellings which is above the minimum standard method figure of 391 dwellings for Stafford. Stafford Borough Council ('SBC') is also proposing a 2,000 dwelling contribution towards meeting the needs of adjacent Housing Market Areas ('HMA').

The Planning Practice Guidance ('PPG') states that there may be occasions where "*previous levels of housing delivery in an area...are significantly greater than the outcome from the standard method*" and "*authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests*" (Reference ID: 2a-010-20201216). Recent housing delivery in Stafford has been significantly more than the standard method figure of 391 dwellings and the proposed increase to 435 dwellings per annum. Table 13 of the 'Lead-in Times and Build Rate Assumptions' ('LTBRA') Topic Paper sets out that in 2020/21 614 dwellings were delivered and in 2021/22 506 dwellings were delivered. Bellway Homes ('Bellway') therefore consider that past delivery should be a key consideration in determining the housing requirement for the Borough and planning for more growth than the proposed 435 dwellings per annum.

Paragraph 1.7 of the supporting text states that the plan identifies 12,580 homes over the plan period which provides a buffer between the supply and the 10,700 dwellings requirement. The majority of new housing growth is being directed to the proposed Meecebrook allocation. It is not considered that this site is well located (National Planning Policy Framework ('NPPF') Paragraph 73) nor will it deliver the number of homes currently projected within the plan period for reasons set out below and additional sites will need to be identified in order to meet any shortfall against the Borough's needs.

Paragraph 1.22 states that the Council is allocating the Meecebrook site in order to look ahead beyond 2040 to meet the Borough's housing needs. However, paragraph 22 of the NPPF states "*where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery*". We do not consider that a 20 year plan period is sufficient particularly given the significant concerns Bellway has with the deliverability of the Meecebrook allocation.

Bellway support SBC's confirmation that a contribution will be made towards the Greater Birmingham and Black Country HMA ('GBBCHMA') and North Staffordshire HMA given the strong migration relationships identified in the evidence base (paragraph 1.30 of the Housing and Employment Land Requirement ('HELN') Topic Paper October 2022). However, we object to the 2,000 dwelling figure proposed. The NPPF (paragraph 31) and PPG requires policies to be justified and the evidence base "*needs to inform what is in the plan and shape its development*" (PPG Reference ID: 61-038-20190315).

There is an identified shortfall of circa 28,000 dwellings across the Black Country up to 2039. Paragraph 1.32 of the HELN Topic Paper sets out that the Black Country authorities have requested for Stafford to take between 1,500-2,000 dwellings to assist in meeting their shortfall. There is no justification provided by the Black Country on how this figure has been calculated. SBC has also not confirmed which HMA / authority need the proposed 2,000 dwelling contribution is seeking to address and it is unclear whether SBC has been part of any Duty to Cooperate discussions with other authorities to identify what contribution they require from the Borough. From the Walsall Council's response to the Preferred Options Plan (Cabinet Version 14 December 2022), they are also unclear which shortfall the 2,000 dwelling contribution will be made towards. From the evidence provided, it seems that SBC's proposed contribution may only cover the Black Country's request and provide nothing towards the significant housing shortfall identified in Greater Birmingham of circa 78,000 dwellings up to 2042 (combined GBBCHMA shortfall of circa 106,0000 dwellings). North Staffordshire HMA has not confirmed at this stage whether there are any identified needs arising from the area so if there are than this will only add to the significant shortfall from the GBBCHMA.

Box 4 within the HELN Topic Paper sets out that the proposed 2,000 dwellings HMA contribution will be met through the delivery of the proposed Meecebrook allocation. SBC explain that the new rail links that will be provided at Meecebrook will connect the new settlement with the adjacent HMAs (we have set out separately under Policy P1 Part B.3 Bellway's concerns with the proposed delivery of new rail infrastructure for Meecebrook). SBC also note in Box 4 that "*meeting unmet housing needs elsewhere in the Borough would be less sustainable and could increase long-distance car commuting*".

As stated above, there is no real justification in the evidence base demonstrating how the 2,000 dwelling contribution towards the HMA shortfall has been calculated. However, SBC note in Box 4 that "*if more than 2,000 new homes in unmet need were to be accommodated, a proportion of those houses would need to be accommodated in the borough's other settlements. The borough's other settlements, including the rural peripheries of Stafford and Stone, have inferior sustainable transport links so housebuilding in these locations would be less likely to contribute to the achievement of sustainable development*". Should all of the unmet HMA need be met only through Meecebrook then this will mean that any delays in the sites delivery will result in delays to delivering housing to meet the significant housing needs.

As set out in our response to Policy 1 Part B.3 below, Bellway Homes have significant concerns with the principle and deliverability of the proposed Meecebrook allocation given the limited information on infrastructure requirements and costs and the unrealistic delivery timescales. Bellway therefore do not consider it appropriate that SBC is focusing all of the proposed unmet need contribution at this site. There is a very significant housing shortfall within the GBBCHMA (circa 106,000 dwellings) which needs to be addressed immediately rather than in the latter part of the plan period (or in this plan period at all). Allocating deliverable sites across the Borough's existing sustainable settlements, such Little Haywood (Tier 4 settlement), will ensure that the needs of the HMA are met in the short and medium term rather than being pushed to a site that is currently not sustainable (no confirmation on when the rail facilities will be delivered, if at all given the weak business case and lack of engagement and support from Network Rail) and is unlikely to deliver any dwellings within the next 10 – 15 years.

SBC is proposing for windfall sites to deliver 50 dwellings per annum across the plan period (6% of the total growth planned). The NPPF (paragraph 71) states that there should be "*compelling evidence*" if an allowance is made for windfall sites as part of the housing supply. The only evidence we could identify on the supply was within the LTBRA Topic Paper. Paragraph 6.3 states that "*small site windfalls are calculated as a rate of 50 per year, which is in accordance with historic data, and are predicted to contribute towards the housing trajectory from year 6 of the plan period (i.e. 2025/26)*". It is considered that in order to comply with the NPPF, SBC should clearly set out within the evidence what the historic windfall delivery rates have been in the Borough.

Policy 1 - Part B.3 (Meecebrook)

Policy 1 states that 3,000 dwellings will be delivered at the proposed new settlement of Meecebrook by 2040. This amounts to 24% of growth proposed across the plan period. The NPPF (paragraph 31) requires policies to be underpinned by relevant evidence which is adequate, proportionate and justifies the policies proposed. Bellway object to this proposed allocation and have significant concerns with the proposed delivery of this site given the limited amount of evidence provided to demonstrate its delivery.

The NPPF (paragraph 73) requires new settlements to be “*well located*” and “*supported by the necessary infrastructure and facilities (including a genuine choice of transport modes)*”. Paragraph 73 of the NPPF goes on to state that Councils should “*identify suitable locations for such development where this can help to meet identified needs in a sustainable way*” through considering “*opportunities presented by existing or planned investment in infrastructure*” [Savills emphasis]. Bellway do not consider that the location of the Meecebrook allocation is ‘well-located’ given its distance from any key existing infrastructure. However, Bellway understand that the Meecebrook site has been selected by SBC because of the planned investment in a new station to serve the site. Bellway has significant concerns with the rail station proposal and its deliverability.

Bellway and a group of developers / promoters (Richborough Estates, Bloor Homes and Stoford Developments) have jointly commissioned a report by ‘Intermodality’ to assess the deliverability and feasibility of a new railway station being delivered on the west coast mainline. The ‘Review of New Passenger Station Proposals’ (2 December 2022) report has been submitted with these representations. The report sets out serious issues and areas of risk in delivering a new station on the West Coast Main Line which have not been addressed within the limited evidence base published with the Preferred Options consultation.

Paragraph 106 of the NPPF requires planning policies to be prepared with the active involvement of local highways authorities and other transport infrastructure providers and operators so that strategies and investments for supporting sustainable transport and development patterns are aligned. The Infrastructure Delivery Plan (2022) does not list any engagement which has taken place between SBC, the Meecebrook landowners / developers and Network Rail on the proposed new station. Most significantly, following a Freedom of Information request, Network Rail has confirmed that they have not been involved in the proposals (Appendix A of the Intermodality Report). Without the key rail provider’s involvement (and buy-in) in the proposals, Bellway do not consider that SBC has sufficiently demonstrated that the new station is deliverable. In order to comply with the NPPF issues around delivery of the railway station and highways and other infrastructure associated with Meecebrook need to be front loaded and addressed in the Local Plan, rather than development being dependent on them being addressed.

The Intermodality Report also confirms that the provision of a station at Meecebrook is highly likely to require a 4-platform station (platforms on the fast and slow lines). This would cause significant disruption during construction as well as the logistics of adding in additional station calls and signalling. The West Coast Main Line is the busiest mixed-use railway in Europe with over 500 existing passenger and freight services per day so this is a significant consideration that requires Network Rail's involvement. Has any consideration been given to the likely impacts on amenity of locating development immediately adjacent to this train line?

Additionally, the submitted Intermodality Report also sets out significant concerns with the viability of the proposed new station. SBC assumes that the new station will be fully operational within the next 4 years. However, the level of development needed to achieve (at best) a medium level of value-for-money for the station would not be in place before the mid-2050s at the earliest. There is no evidence to demonstrate how the significant costs associated with the construction and operation of the station will be funded up to 2050.

Even if the rail station was delivered, the Meecebrook Garden Community Transport Strategy (July 2020) concluded that a new settlement in this location would have a major impact on the existing highway network. The site is not in close proximity to any significant movement corridors and therefore we expect that major highways improvements will be required to support development in the proposed unsustainable location.

In light of the uncertainty surrounding the station, Bellway do not consider that the Meecebrook allocation is 'well-located' or served by any existing or realistic planned infrastructure that would make it a sustainable location for such significant growth. The proposed allocation is therefore contrary to paragraph 73 of the NPPF and is not a suitable location for a new settlement.

In regards to the wider infrastructure proposed to support settlement of 6,000 dwellings, contrary to NPPF paragraph 31, there is very little information included within the evidence base documents to set out what level of infrastructure is required and whether its delivery is viable or deliverable. The Viability Assessment (September 2022) is based on very high level assumptions and clearly sets out that so far there has been little input on likely infrastructure costs. Paragraph 73 of the NPPF states that policies for new settlements should "*ensure that appropriate tools such as masterplans and design guides or codes are used to secure a variety of well-designed and beautiful homes to meet the needs of different groups in the community*" [Savills emphasis]. However, the Viability Assessment (paragraph 6.42) concludes that in order to deliver 40% affordable housing and be viable,...

...the development would not be able to meet other policy requirements and is likely to impact on the quality and future-proofing of the site (e.g. accessibility standards, electric charging points etc). As the largest allocation in this plan period (and potentially the next plan period with a further 3,000 dwellings expected), for this site to potentially not deliver affordable housing or other policy requirements seeking to meet future homes standards is unacceptable and will be contrary to paragraph 60 of the NPPF as the specific housing needs of different groups will not be addressed.

Page 86 of the Viability Assessment confirms that there is a lack of clarity around landowner commitment. In order for SBC to demonstrate that this site is 'deliverable', there should be clear evidence to demonstrate that all of the landowners within the proposed Meecebrook allocation are willing for their land to form part of the allocation and have agreed to work together in a collaborate fashion to bring a development of this scale forward. This is particularly important for a development of this scale given this site will be delivered over a long period of time and will involve complex equalisation agreements to deliver the joint infrastructure. Without landowner support, how is SBC expecting to deliver the site in such over-ambitious timescales?

The Inspector for the examination into the Tunbridge Wells Local Plan recently raised concerns around the treatment of large scale strategic allocations in the submitted Local Plan in his initial findings. The Inspector raised concerns regarding the adequacy of the evidence base in relation to the new settlement at Tudeley Village (new settlement of 2,800 dwellings), as well as in relation to aspects of the growth at Paddock Wood (3,500 homes and 11 ha employment).

In relation to Tudeley Village the Inspector highlighted the need for the Local Plan evidence base to include additional information in relation to infrastructure requirements, including funding and phasing and the relationship between delivery rates and viability. In the absence of this information in the Local Plan he concluded that the Local Plan required modification to make it sound and capable of adoption. The Inspector concluded that providing additional information in relation to Tudeley Village would not be a quick or straightforward exercise. Modifying the policy could also add significant delays to the examination process. The third option he presented was to delete the allocation and make consequential changes to the Local Plan.

Similarly, the Inspectors Report into the Shared Strategic Local Plan for North Essex concluded in relation to the Garden Community proposals that they need demonstrate a reasonable prospect of being viably developed, setting out clear details of phasing of necessary infrastructure linked to a delivery timetable and that any garden community proposals must be clearly shown to be financially viable.

The above highlights the importance of the Local Plan front loading relevant issues in relation to the delivery of Meecebrook at the time it is submitted.

The NPPF (paragraph 73d) requires that Councils should “*make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation*”. SBC is currently claiming that 300 dwellings will start being delivered at Meecebrook from 2030/31 and then consistently throughout the rest of the plan period. Bellway have a number of concerns with the proposed trajectory of this site.

The LTBRA Topic Paper sets out SBC’s proposed approach to development on the projected delivery timescales for the allocations. SBC acknowledge in the report that, if allocated, Meecebrook will be the largest development delivered within the Borough. Therefore, SBC has limited experience in managing and delivering a development of this scale. However, SBC has looked at experience in adjacent authorities and also reviewed the findings of the Lichfields’ Start to Finish report (February 2020) which Bellway supports.

Table 12 in the LTBRA Topic Paper sets out SBCs proposed annual build rate assumptions and states that on sites of 2,000+ dwellings the proposed trajectory is 160 dwellings per annum. This aligns with Table 10 of the LTBRA Topic Paper, which sets out the findings of the Lichfields Report. It is therefore unclear why SBC is proposing for Meecebrook to deliver almost double the figures identified in Tables 10 and 12 when SBC’s own evidence is stating that a realistic assumption is 160 dwellings per annum. The proposed delivery rate is therefore considered to be unrealistic, over stated and therefore contrary to NPPF paragraph 73d.

In terms of the 2030/31 delivery commencement date, Bellway also do not consider that this is realistic. Table 5 of the LTBRA Topic Paper shows Lichfields’ timeframe assumptions from validation to completion of the first dwellings on a site. For 2,000+ dwellings, the average is 8.4 years. Table 7 shows SBC’s assumptions on timescales and this only shows sites of 500+ which SBC consider will only take 4.5 years from validation and completion of the first dwellings. This is wholly unrealistic and given SBC’s limited experience in delivering sites of 3,000 dwellings. SBC should be relying on the evidence of other authorities and Lichfields. In the best case scenario (i.e. application is validated upon the adoption of the Local Plan in October 2024), SBC should not be projecting the completion of any dwellings at Meecebrook until 2033/34 (8.4 years from October 2024) at the very earliest. However, given not all of the landowners are currently part of the promotion and the scale and cost of required infrastructure is unknown, we do not consider that it is likely an application would be ready for submission by October 2024.

In light of the above, in the best case scenario, SBC will need to identify sites to accommodate a minimum of 600 dwellings which will not be delivered in 2030/31 and 2031/32 as currently shown in Table 13 of the LTBRA Topic Paper. This shortfall will only increase when SBC provide a more realistic assumption for the first couple of years of construction and it is extremely unlikely that the site will consistently deliver the same 'maximum' number of dwellings across the whole build period when infrastructure triggers are taken into account. There are likely to be fluctuations in delivery which should be considered.

Policy 7 of the Local Plan also refers to a Framework Masterplan Supplementary Planning Document (SPD) being prepared for the site, including consideration of phasing, which could also add to lead in times. An SPD cannot allocate land for development, as it does not form part of the development plan, which means that decisions around the location of the local centre, employment and railway station will need to be made as part of Local Plan preparation so that these can be identified on the Local Plan proposals map.

In summary, Bellway considers that the proposed allocation of land at Meecebrook for 3,000 dwellings is contrary to the NPPF (paragraph 73) as the site is not well-located, the planned rail infrastructure is likely to be undeliverable and the proposed rates of delivery and lead-in time are not realistic or supported by any evidence. Bellway therefore considers, that additional housing sites should be allocated adjacent to the existing and sustainable Tier 4 settlements in place of Meecebrook . Should SBC have an aspiration to deliver a new settlement in the long term then further feasibility and technical work should be undertaken and it should be clear within the emerging Local Plan that it will not form part of the housing requirement until there is more certainty on its deliverability.

Policy 1 - Part B.4 (Stafford Station Gateway)

Bellway does not object to the principle of development or the allocation of Stafford Station Gateway given it is a brownfield site located within the largest settlement in the Borough and is in close proximity to Stafford train station and the shops, services and facilities offered within the settlement. Bellway does not question that some parts of the site which are being promoted by willing landowners / developers could be delivered within the plan period, however, Bellway consider that further justification should be provided in order to demonstrate that the whole allocation (900 dwellings) will be delivered within the plan period. If the full site cannot be delivered then SBC should consider allocating further development sites within or adjacent to existing sustainable settlements which could deliver dwellings in the first part of the plan period and meet any gaps in delivery from Stafford Station Gateway.

Policy 1 - Part B.5 (The development of other allocations under Policy 12)

Supporting paragraph 1.13 of Policy 1 states that “*housing in the borough’s rural communities is allocated in the larger settlements...which have more services and facilities*”. However, SBC is not proposing to direct growth to Little Haywood & Colwich which is one of the most sustainable settlements in the Borough. Little Haywood performs the same as Woodseaves in the ‘Revised Settlement Assessment and Profiles’ Topic Paper (both score 8). Additionally, Bellway’s site is in close proximity to Great Haywood. Great Haywood is a better performing settlement than both Woodseaves and Gnosall (score of 11 compared to 8 for Woodseaves and 10 for Gnosall). Yet the Preferred Options plan proposes to allocate 125 dwellings in Woodseaves and 109 dwellings in Gnosall whilst no development is being directed to Little Haywood & Colwich or Great Haywood. Bellway does not consider that SBC’s proposed approach to the amount of growth being directed to Tier 4 settlements (just 4% of the overall growth) or the location of the proposed allocations is justified or sound as it is contrary to the proposed spatial strategy and evidence base. The lack of growth being directed to large settlements is likely to result in decline in the viability / vitality of services within the villages. This is particularly concerning for Little Haywood which has been the target of minimal growth in the adopted plan as well as the emerging plan.

Paragraph 4.18 of the LTBRA Topic Paper refers to the only application over 1,000 dwellings in Stafford (reference 16/25450/OUT). The Topic Paper states that the current lead in time for the site is 5.3 years. Bellway does not consider that this is correct. On SBC’s planning application website it states that the application was validated 20 December 2016 and determined on 30 May 2022 which is 6.5 years. However, even if the 5.3 years stated was correct, it is unclear why SBC is proposing for a lead in time for 500+ dwelling sites of 4.5 years in Table 7 of the Topic Paper.

Paragraph 4.5 of the LTBRA Topic Paper states that two of the largest applications that delivered between 100 to 499 dwellings and didn’t have an outline application, had a shorter lead time than the 5 to 9 dwelling and 10 to 49 dwelling sites submitted and determined by SBC. These two large sites were developed by Persimmon and Bellway Homes. The Topic Paper states that “*these housebuilders are likely to have the in-house expertise to be able to develop the application and meet the council’s expectations and policies quicker than other applicants, which could explain the shorter lead-in time*”. Bellway support this statement and consider that sites which are being promoted by housebuilders, such as Bellway, should be assessed favourably in terms of their deliverability. SBC is placing an over reliance on Meecebrook which Bellway does not consider is likely to deliver in the first part of the plan period (if at all – see our response to Policy 1 Part B.3 and the separate Intermodality Report), therefore SBC should be allocating more sites which can start to be delivered within the next 5 years. It is considered that Bellway Homes’ land at Little Haywood (COL10 and COL13) could assist SBC in meeting its short and medium term needs.

In regards to build rates, paragraph 5.9 of the LTBRA states that *“in terms of the proposed assumptions for build rates it is fair to assume that as the difference in build rate between greenfield and brownfield / PDL is minimal, the same assumptions can be applied on the basis of site size rather than site type”*. It is considered that the number of landowners should be a factor when assessing lead-in times and build out rates, as this is likely to lead to delays if negotiations or land assembly are required. Where land is controlled by a single developer, like Bellway’s site at Little Haywood (COL10 and COL13), these sites are likely to be delivered more quickly than a site with multiple developers / landowners.

Table 13 of the LTBRA sets out the proposed trajectory of allocated sites. The table shows that the proposed Meecebrook allocation is expected to deliver 300 dwellings consistently from 2030/31 and Stafford Station Gateway is proposed to start delivering 70 dwellings per annum from 2028/29 up to 2038/39 where 100 dwellings per annum will be delivered that year and in 2039/2040. For both of the sites, you would not expect delivery in the first year to match the rest of the construction period. You normally expect delivery to ramp up after the first few years. This has not been reflected in the Council’s trajectory which shows 300 and 70 dwellings consistently being delivered across the plan period for both sites.

Table 13 also sets out proposed trajectories for the West and North Strategic Development sites. Bellway request that previous delivery figures are added to the Table 13 so that we can assess whether the increased trajectories proposed for both sites across the plan period are realistic and reflective of past delivery. The delivery figures shown in Appendix 2 of the LTBRA do not come close to those projected in Table 13. Burleyfields is currently delivering 52 dwellings per annum and Castleside is just 18 dwellings per annum.

Policy 1 - Part C. (The spatial distribution of new housing)

The Table within Policy 1 sets out that only 4% of housing growth between 2020-2040 is being directed to the Tier 4 Larger Settlements. Bellway strongly object to the limited amount of growth being directed to some of the most sustainable settlements in the Borough. Notwithstanding our comments on Meecebrook in our response to Policy 1 Part B.3 and the concerns over its suitability for an allocation and the level of dwellings it can deliver in the plan period if allocated, not directing growth to Little Haywood, which is a Tier 4 settlement, is contrary to the Council’s proposed spatial strategy and therefore Policy P1 is not justified or sound.

Table 1 of the HELN Topic Paper sets out completions and commitments by settlement between 2011/12 to 2021/22. Little Haywood / Colwich's total is just 13 dwellings equating to a 1.36% increase. As one of the most sustainable settlements in the Borough, the continued approach to stifle growth in Little Haywood is contrary to SBC's spatial strategy. The allocation of Bellway's site adjacent to Little Haywood (COL10 and COL13) would ensure that the settlement is receiving a proportionate amount of growth for the shops, services and facilities it provides.

Bellway's sites are also in close proximity to the shops, services and facilities provided within Great Haywood. Table 1 of the HELN Topic Paper states that 254 dwellings have been delivered in Great Haywood which is a 30.3% increase in number of dwellings in each settlement. Within the Sustainability Appraisal ('SA') it notes at paragraphs 5.2.34 and paragraph 9.6.7 that Great Haywood has had 'high growth' between 2011-2021 compared to other Tier 4 settlements. This has been one of the reasons why additional growth has not been directed to the settlement in the Preferred Options plan. It is not clear why development is not being directed to settlements just because they have experienced growth within the adopted plan. If there is sufficient existing and / or proposed infrastructure to accommodate the growth then the scale of growth delivered in a settlement should not be a factor in determining whether it is suitable for more growth up to 2040. The dwellings being built in Great Haywood are obviously being sold which demonstrates a local need for these homes.

Appendix VI of the SA (pages 119 and 120) acknowledges that there is a strategic case for a degree of growth in Little Haywood / Colwich given the area has "*good road links to neighbouring areas to the south and Stafford Town*". The SA also notes that Little Haywood has had very limited growth in the last 10 years (only 13 dwellings).

The SA lists a number of constraints around the Little Haywood / Colwich including its relationship with the River Trent, Shugborough Estate, Cannock Chase SAC and Local Green Space. The SA states that given the river corridor to the south / west of Little Haywood / Colwich and the A52 to the east, it "*would suggest a need to focus attention on north as a potential direction for growth, but land here is sensitive on account of forming the landscape gap between Little and Great Haywood as well as partly designated in the adopted Neighbourhood Plan as Local Green Space*". We address Local Green Space in further detail in our response to Policy 13 below, however we do not consider that Local Green Space should be a factor in determining where growth is directed to around this sustainable settlement, partially on Bellway's site (COL10 and COL13). In regards to the other ecological, heritage and landscape considerations noted within Appendix VI and V of the SA, these have all been assessed and considered by technical consultants when producing the submitted Promotion Document (April 2020) and concept masterplans for Bellway's site. Updated technical notes have been produced and submitted with these representations in response to the new evidence documents which have been published with the Preferred Options document.

Bellway acknowledges the heritage and environmental constraints noted for their site (COL10 and COL13), however, technical work has been submitted to the Council to demonstrate how these constraints could be mitigated. Additionally, no landscape, ecology and heritage constraints were identified by the Inspector for COL10 when a previous appeal was determined on the site. This is discussed further in our response to Policy 12. Bellway therefore consider that more than 4% of the Local Plan's housing growth should be directed to Tier 4 settlements and the sustainable settlement of Little Haywood / Colwich should be the location of additional growth.

Policy 1 – Part E (Local Plan Review)

Part E of Policy 1 states that the development strategy will be reviewed within 5 years of the adoption of the plan. Given the significant housing shortfall within the HMA's it is considered that this policy should incorporate an early review mechanism triggered upon the adoption of the emerging HMA Local Plans which will confirm the level of shortfall. Additionally, it should not just be the development strategy that is reviewed but all policies within the local plan as required by the NPPF (paragraph 33).

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

No

Policy 2 Comments:

Policy 2 states that “*new development will be of a scale commensurate with the position of the settlement in the hierarchy*”. Little Haywood / Colwich is identified as Tier 4 larger settlements within the proposed settlement hierarchy. As stated in our response to Policy 1, Bellway does not support the limited growth being directed to the sustainable Tier 4 settlements. These settlements have been assessed in the Council’s evidence base (‘Revised Settlement Assessment and Profiles’ Topic Paper) as being sustainable as a result of the existing shops, services and facilities that they offer. Therefore, it is considered that more housing growth should be directed to these Tier 4 settlements.

A significant proportion of the proposed housing growth up to 2040 in the Borough is being directed to Meecebrook (24%). As set out in our response to Policy 1, it is considered that Meecebrook is not “well located” (NPPF paragraph 73). SBC is proposing to deliver new rail infrastructure to support the proposals but there has been no evidence provided by SBC as part of this consultation to demonstrate that the rail infrastructure is deliverable within the plan period. Without the rail infrastructure, Meecebrook should not be considered as a more sustainable development opportunity than existing settlements listed under Tier 4.

Policy 6. Neighbourhood plans

No

Policy 6 Comments:

Policy 6.A states that policies of made neighbourhood plans remain in effect and will be given appropriate weight, except for those listed within Appendix 5. There are no policies currently listed in the Preferred Options version of Appendix 5. Appendix 5 states that the superseded neighbourhood plan policies will be listed within the Regulation 19 consultation document. Without the confirmed list of policies, we are unable to make a comment on whether Bellway support or object to the proposals at this time.

Policy 6.B states that Neighbourhood Plans must be in broad accordance with the strategic policies of the Local Plan. Colwich Neighbourhood Plan ('CNP') was made in November 2016. It is considered that the majority of policies within the plan have the potential to be broadly consistent with the strategic policies listed within Policy 6.B. However, as set out elsewhere in our representations, Bellway consider that further development should be directed to the sustainable settlements of Great Haywood and Little Haywood within Colwich Parish, therefore CNP Policy CC1 will need to be updated to reflect any revised settlement boundaries.

Additionally, as set out in our response to Policy 13, Bellway strongly object to the Local Plan proposing to retain the Local Green Space (LGS) designated in CNP. It is considered that the LGS designated within CNP Policy CE2 do not accord with the national LGS guidance and therefore does not meet basic condition a (having regard to national policies and advice). Bellway request that CNP Policy CE2 is identified as a superseded NP policy within Appendix 5 of the plan.

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?

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:

Bellway object to this proposed allocation for a number of reasons. Please see our response to Policy 1 Part B.3 which set out our concerns with the principle and delivery of this proposed new Garden Settlement.

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 12. Other housing and employment land allocations.

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

No

Policy 12 Comments:

As set out in our separate responses to Policy 1 and Policy 2, Bellway object to the housing growth being directed to Gnosall and Woodseaves (particularly proposed allocations GNO04 (100 dwellings), HIG10 (25 dwellings) and HIG13 (88 dwellings)) which have been assessed by SBC as being as sustainable as Little Haywood / Colwich. Additionally, Bellway has also raised objections to the amount of housing being directed to Meecebrook which is considered to be an unsuitable location for a new settlement (NPPF 73) and Bellway consider that SBC should be making a more substantial contribution towards meeting the significant housing shortfalls arising from adjacent HMAs. In light of this, it is considered that more housing growth should be directed to the sustainable Tier 4 settlements, such as Little Haywood / Colwich and this policy should be updated to reflect the additional allocations required to meet the shortfall identified from Meecebrook and provide a more meaningful contribution towards meeting the adjacent HMAs' needs.

Paragraphs 6.14 and 6.15 of the Infrastructure Delivery Plan (IDP) 2022 state that no response has been received from CCG yet. Without a response from the CCG, the Council cannot confirm whether existing health facilities have the capacity to accommodate the proposed additional growth or if expansion of existing facilities or erection of new facilities is required. Either way, financial contributions and / or land for a new facility, could have a significant impact on the viability and / or net developable area of proposed allocations and needs to be considered.

Under the capital cost column of Appendix 1 (IDP 2022), the majority of costs are noted as being either 'TBC' or 'unknown'. The supporting text to the table confirms that "*the majority of the costs at this stage are yet to be confirmed*". The PPG requires plans to set out contributions expected from development and should include cost implications (Reference ID: 10-001-20190509). Without these costs it is unclear whether the proposed allocations are viable or deliverable and if they have or will have the infrastructure to support them.

Paragraph 7.2 of the IDP states that electricity upgrades are required in Gnosall and therefore development is unlikely to be accommodated in this settlement until after 2030. The projected housing completions within Table 13 of the LTBRA Topic Paper groups the sites located under Policy 12 as 'other Site Allocations'. It is therefore unclear when the Council consider that the proposed allocations will be delivered across the plan period and we cannot confirm if the Gnosall allocations are projected to deliver after 2030. Given the limited number of allocations proposed, it is considered that the Council should provide a trajectory for each of the new allocations as part of their evidence base.

The Viability Assessment (September 2022) did not assess the individual site allocations except for the proposed Meecebrook and Stafford Station Gateway allocations. Section 7.2 of the assessment recommends lower affordable housing rates than what is identified as the need within the EHDNA (between 5,040 to 7,780 dwellings up to 2040). These percentages are reflected within proposed Policy 23 (Affordable Housing). The HELN Topic Paper (paragraph 5.1) sets out that SBC consider that the figures within the EHDNA overestimate the true need. However, the document does not set out any analysis on what level of affordable housing the proposed allocations will deliver against the need, assuming they are all policy compliant. Bellway request that this analysis is undertaken and published with the Publication version of the plan to assess what levels of affordable housing need will be met across the plan period and how much this may differ from the EHDNA.

Bellway's site at Little Haywood / Colwich have been assessed by SBC as sites referenced COL10 and COL13. COL13 represents all of the land submitted for residential development by Bellway Homes and COL10 represents a smaller development option within the wider promotion opportunity. Within the SHELAA 2022, SBC concluded that that "*the portion of the site not designated as Local Green Space in Colwich Neighbourhood Plan is potentially developable*". As a result of this positive assessment in the SHELAA, the Sites passed 'stage 2' of the process (paragraph 2.2 of the Site Selection Topic Paper) and were subsequently assessed within SBC's 'Site Assessment Profiles' (stage 3) which included input from key statutory consultees.

Both COL10 and COL13 were rejected the Site Assessment Profiles (2022). The reasoning given for COL10 was "*education capacity constraints are unlikely to be able to be resolved and ecology and landscape concerns are unlikely to be able to be suitably mitigated for. Additionally, to attain access to the site significant works are likely required which may not be feasible or viable*". The reasoning given for rejecting COL13 was "*education capacity constraint would need resolving. Additionally, ecology, landscape and heritage concerns are unlikely to be able to be suitably mitigated for*".

The development proposals for COL10 and COL13 shown within Promotion Document (April 2020) have been informed by a range of technical work (heritage, landscape, ecology and highways) which concluded that, subject to mitigation and through the sensitive design of the scheme, there were no technical considerations which would impact on the development potential of the site. Additionally, land shown within COL10 was the subject of previous planning applications and appeals (application references 14/20477/OUT and 15/22731/OUT). The Inspector for the most recent appeal (15/22731/OUT) concluded that with careful consideration the proposed development could respond to existing natural features and respect the rural character of the area (paragraph 92 of the appeal decision) so she did raise any concern with impacts on landscape or the AONB. Additionally the inspector concluded that any impacts on trees and ecology could also be mitigated. Bellway therefore do not agree with SBC's assessment of COL10 that it impacts on ecology and landscape cannot not be mitigated.

Bellway has instructed the 'Environmental Dimension Partnership' (EDP) to review the Site Profile Assessments for COL10 and COL13 as well as the new evidence documents which have been published relating to ecology, landscape and heritage. The three technical notes have been submitted to SBC with these representations and are summarised below. Overall, EDP do not consider that SBC's suggested ecology, landscape or heritage constraints are sufficient to justify SBC's conclusion that COL10 and COL13 are not suitable for development within the plan.

- Ecology Technical Note (November 2022) – an updated Phase 1 Habitat Survey has been undertaken which confirms that over 75% of COL13 is made up of species-poor grassland that is of low value and distinctiveness which is greater than the level suggested for the site in the SBC Ecological Assessment. It is considered that there is scope to potentially avoid impacts on the grassland habitats of greater botanical diversity through sensitive development design and compensation elsewhere on-site. The incorporation of a well-considered green infrastructure network within the development layout could ensure that habitat connectivity within the Site and in the surrounding landscape is maintained. The Site Profile Assessment also states that COL13 lies within a 'red' Great Crested Newt Risk Impact Zone. Whilst the presence of great crested newts on-site, and being in a Red zone, means that a future development at the site will require appropriate mitigation and licensing, it does not in any way preclude development on COL10 or COL13.

- Landscape Technical Note (November 2022) – the Council’s Landscape Sensitivity Study (‘LSA’) (October 2021) and Cannock Chase AONB Views and Setting Guide have been reviewed by EDP. The high landscape sensitivity set out within the LSA, with COL10 being ‘high-medium’, has largely derived from the site’s proximity to the Cannock Chase AONB. However, in views from the AONB, the majority of the site is barely perceptible, if seen at all. Furthermore, the LSA has been found to be based on a brief methodology with the final judgement of sensitivity being based on ‘professional judgement’.

In regards to the AONB, EDP's analysis of the site to date has shown that due to changes in the baseline landscape in the time since the Council's assessment was undertaken in 2001, this being the most up-to-date assessment available on the Council's website, a moderate rather than high sensitivity is appropriate. As such, at this early stage, there is absolutely no reason to conclude that the site's proximity to the Cannock Chase AONB should preclude sensitive development in this location.

EDP's work to date has concluded that the minimisation of visibility to the proposals from the AONB could be achieved through the retention, enhancement of and addition to vegetation at the north-western and north-eastern site boundaries. In addition, the visibility of new built form could be limited by excluding development from the more elevated slopes, as on the adjacent settlement, and/or by limiting the height of development in these areas of the site.

- Heritage Technical Note (November 2022) – SBC’s exclusion of COL13 because of the identification of ‘potential’ substantial harm is unjustified as the impact of development on designated heritage assets has been overstated. ‘Substantial’ harm is a very high test within the NPPF (Section 16) which requires much or all of a designated heritage asset’s significance to be lost. This is quite evidently not going to happen to Shugborough Estate and Conservation Area if COL13 is developed. Furthermore, SBC’s assessment does not take into consideration the masterplan proposals or mitigation that can be incorporated to minimise any potential harm.

Bellway has also instructed ‘Education Facilities Management’ (EFM) to review education capacity within proximity of COL10 and COL13. The Site Assessment Profiles stated that there was no existing capacity in Colwich Primary School or The Hart Academy (which are apparently the closest schools to Bellway’s site) and this was listed as a reason for rejecting the site.

The EFM Report actually identifies that there are at least 3 independent primary schools within 2 miles of the site (Colwich Primary School, Anson Church of England Primary School and St John Catholic Primary School). The report has identified that there is existing capacity in Colwich Primary School and St Johns Catholic Primary School. There is therefore considered to be sufficient primary school capacity to serve a development of less than 200 dwellings. Should more than 200 dwellings be delivered and the additional spaces would be needed. EFM acknowledge that there is no capacity for the Colwich primary school to expand, however as part of the development of Bellway's site, land for a primary school could be delivered. However, it is important to note that should the St Johns Catholic school be included in the school roll data then there would be sufficient capacity to accommodate growth of circa 500 dwellings and land for a primary school would not be required as part of Bellway's site. There is therefore no justification to reject the site on lack of primary school capacity.

In regards to secondary education, it is the Weston Road Academy which serves Little Haywood and not The Hart Academy. Staffordshire County Council provides school transport to Weston Road Academy from Little Haywood. The Academy is at capacity now but SCC have plans to construct a new secondary school. It is not unreasonable for SCC to request contributions towards secondary provision but it should not be a reason to reject Bellway's site. Additionally, a secondary school in Rugeley (Hagley Park Academy) was closed in 2016 due to lack of demand for places and we understand a new secondary school is proposed to be delivered as part of the Rugeley Power Station development.

The proposed yields noted within the Site Assessment Profiles for COL10 and COL13 were 78 dwellings and 340 dwellings respectively. The Profiles note that the yield calculation excludes the Local Green Space (circa 11ha). Bellway object to this approach. As part of the development proposals being promoted on these sites, Bellway has proposed to relocate the LGS in appropriate locations within the site. At the moment, the LGS are not connected and is not all publicly accessible. The development proposals proposed within the submitted Promotion Document (April 2020) will increase the amount of Local Green Space across COL13 by circa 3.9ha (circa 14.9ha of open space proposed). It is considered that by remodelling the LGS on site, it will create in enhancements to accessibility as the LGS will be more connected and more usable. Bellway therefore consider that the proposed yield for COL13 should be recalculated to accord with the proposals submitted in the Promotion Document (around 425 dwellings at 32 dwellings per hectare).

In light of the above and the technical evidence provided, Bellway considers that the 'constraints' noted within the Site Assessment Profiles for COL10 and COL13 can be mitigated against and will not hinder development on a site in a sustainable site between two Tier 4 settlements.

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)

No

Policy 13 Comments:

SBC proposes to designate an additional 19 LGS across the Borough. In order to conclude that these sites met the LGS criteria, SBC undertook a series of assessments and scored the sites against specific criteria listed within the 'Local Green Space Designations Background Paper'. It is considered that SBC's approach to identifying the 19 LGS was thorough, fair and well evidenced. This level of detailed assessment is not something that was undertaken in preparing for the Colwich Neighbourhood Plan (CNP) and there is no evidence available to support the LGS designations in the CNP. It is considered that the approach by SBC for the proposed additional 19 LGS, should be extended to assess the designated LGS within the Borough and identify whether they should still be designated as LGS in the new Local Plan.

The NPPF (paragraph 102) requires local green space designations to meet the following criteria:

“(a) in reasonably close proximity to the community it serves;

(b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and

(c) local in character and is not an extensive tract of land.” [Savills Emphasis]

The PPG (Reference ID: 37-019-20140306) states that *“the qualifying body (in the case of neighbourhood plan making) should contact landowners at an early stage about proposals to designate any part of their land as Local Green Space”*. The landowner of COL10 and COL13 was not party to any discussions with Colwich Parish Council in relation to the designation of circa 11ha of their land across 5 parcels. Paragraph 102c of the NPPF states that LGS should not be *“an extensive tract of land”*. Although the individual parcels themselves may not represent an ‘extensive tract of land’, cumulatively across a single landownership, 11ha is considered to be ‘extensive’ and therefore the designations do not accord with the NPPF.

The PPG (Reference ID: 37-007-20140306) also states that *“designating any Local Green Space will need to be consistent with local planning for sustainable development in the area. In particular, plans must identify sufficient land in suitable locations to meet identified development needs and the Local Green Space designation should not be used in a way that undermines this aim of plan making”*. As set out in our responses to Policies 1, 2 and 12, Bellway consider that further housing growth should be directed to the sustainable settlement of Little Haywood / Colwich. Bellway’s land (COL10 and COL13) is between Little Haywood and Great Haywood so is considered to be well located and accessible to the shops, services and facilities provided in both settlements. The submitted Promotion Document (April 2020) for the site shows that by remodelling the LGS on site, it will create enhancements to accessibility as the LGS will be more connected and more usable. We therefore consider that the LGS should not act as a constraint to where future development is proposed in the Local Plan, especially when there are significant housing needs from adjacent HMAs that need to be met and the designated LGS are adjacent to sustainable Tier 4 settlements.

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.



HAYWOOD VALE
STAFFORDSHIRE

VISION DOCUMENT

April 2020



Illustrative view of multi-use green corridors providing local facilities and amenity.

THE VISION

The Site presents an excellent opportunity to deliver new green infrastructure, enhance connectivity and accessibility and provide high quality new homes on 31.1 hectares (76.9 acres) of land as part of an inclusive and sustainable extension to the local community. The vision for the Site is for a landscape-led approach with large, usable green corridors around which residential development, using existing site features, will be accommodated whilst complementing the surrounding site context to create a sustainable new development.

To support the vision for the Site, this Vision Statement clearly articulates the opportunities presented by the Site. In summary, it demonstrates that:



The Site presents an excellent opportunity to enhance existing open green space on the Site, creating large new usable green corridors which enhance connectivity between Great Haywood and Little Haywood for pedestrians and cyclists whilst also retaining a green buffer between the two. This will make existing facilities more accessible for the local community.



We have carefully considered the existing Local Green Space designations and produced alternative enhanced green space areas to improve provision and access for local residents, whilst retaining and enhancing existing landscape features where possible.



Retaining and enhancing the network of pedestrian and cycle routes through public open space and sustainable transport links will increase accessibility allowing for more sustainable movement for the new and existing communities into the Site and the wider area, including nearby facilities.



Delivery of a range and mix of dwellings that will make a positive contribution to the district's housing requirement; providing both open market and affordable housing, and generating significant social and economic benefits for the local area.



The Site is deliverable, achievable and available for housing development in accordance with the guidance contained in the NPPF. There are no known technical or environmental constraints that would prevent the Site coming forward for development.

1. INTRODUCTION

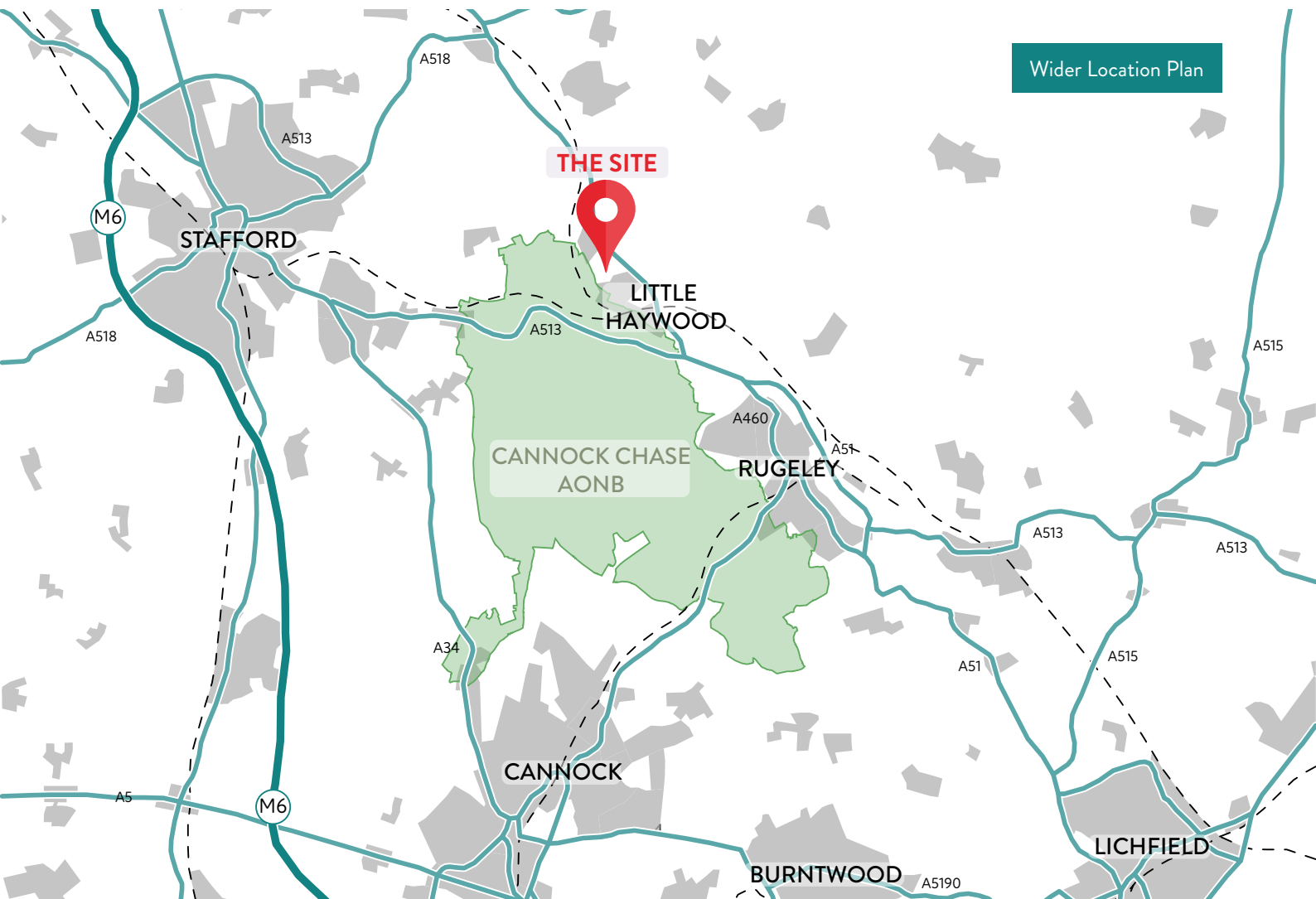
The Site provides an opportunity to create a high quality sustainable residential extension, located between the villages of Little Haywood and Great Haywood, Staffordshire which can deliver much needed family and affordable homes as well as enhanced public open space for the benefit of both new and existing communities.

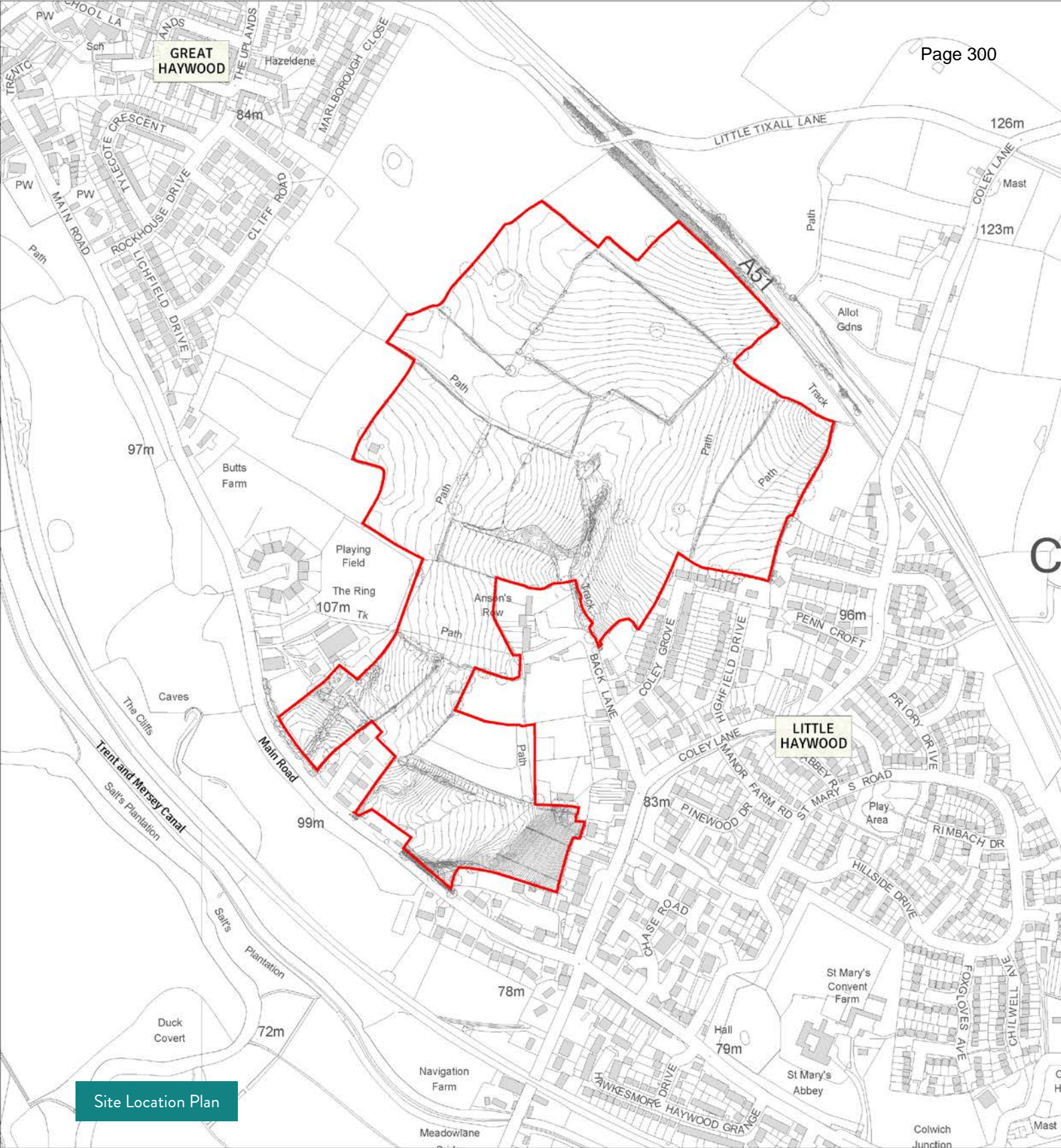
The Site consists of approximately 31.1 hectares of land located north west of Little Haywood. The Site is not within the Green Belt.

The Site is located between Great Haywood and Little Haywood, approximately half a mile north of Cannock Chase AONB and 5 miles west of Stafford.

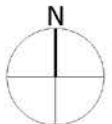
The Site is accessed from Main Road to the south and bounded as follows:

- To the south and south east the Site is bounded by Main Road and residential development. Beyond it to the south are agricultural fields, the Trent Valley Railway, River Trent and Cannock Chase AONB.
- To the north the Site is bounded by the A51 with agricultural fields beyond.
- To the east the Site is bounded by the village of Little Haywood.
- To the north west of the Site are agricultural fields, separating the Site from Great Haywood which lies beyond.





— Site Boundary



2. SITE CONTEXT

The Site is located on the north west edge of the village of Little Haywood and to the south east of Great Haywood. The Site is within walking distance of shops and services in both Little Haywood and Great Haywood villages, although existing connectivity between the two is poor.

ACCESS AND MOVEMENT

The Site is accessed from Main Road which runs from Colwich to the south east, through Little Haywood and up to Great Haywood to the north. Main Road is a single carriageway road with a pavement along the opposite side of the road to the Site.

There are a number of Public Rights of Way (PRoW) running through the Site which offer pedestrian connections to the surrounding area including Little Haywood, Great Haywood and the surrounding countryside. Existing pedestrian and cycle connections between the two villages is limited with only a single PRoW with a poorly defined path running between them directly.

Current access to the fields which make up the Site is restricted to the alignment of the public footpaths, with

no formal or informal open space or recreational activities available and the condition of many of the footpaths is poor (wet and boggy under foot).

The Site is also located within walking distance of bus services on Main Road.

PUBLIC TRANSPORT

The closest bus stops to the Site are located:

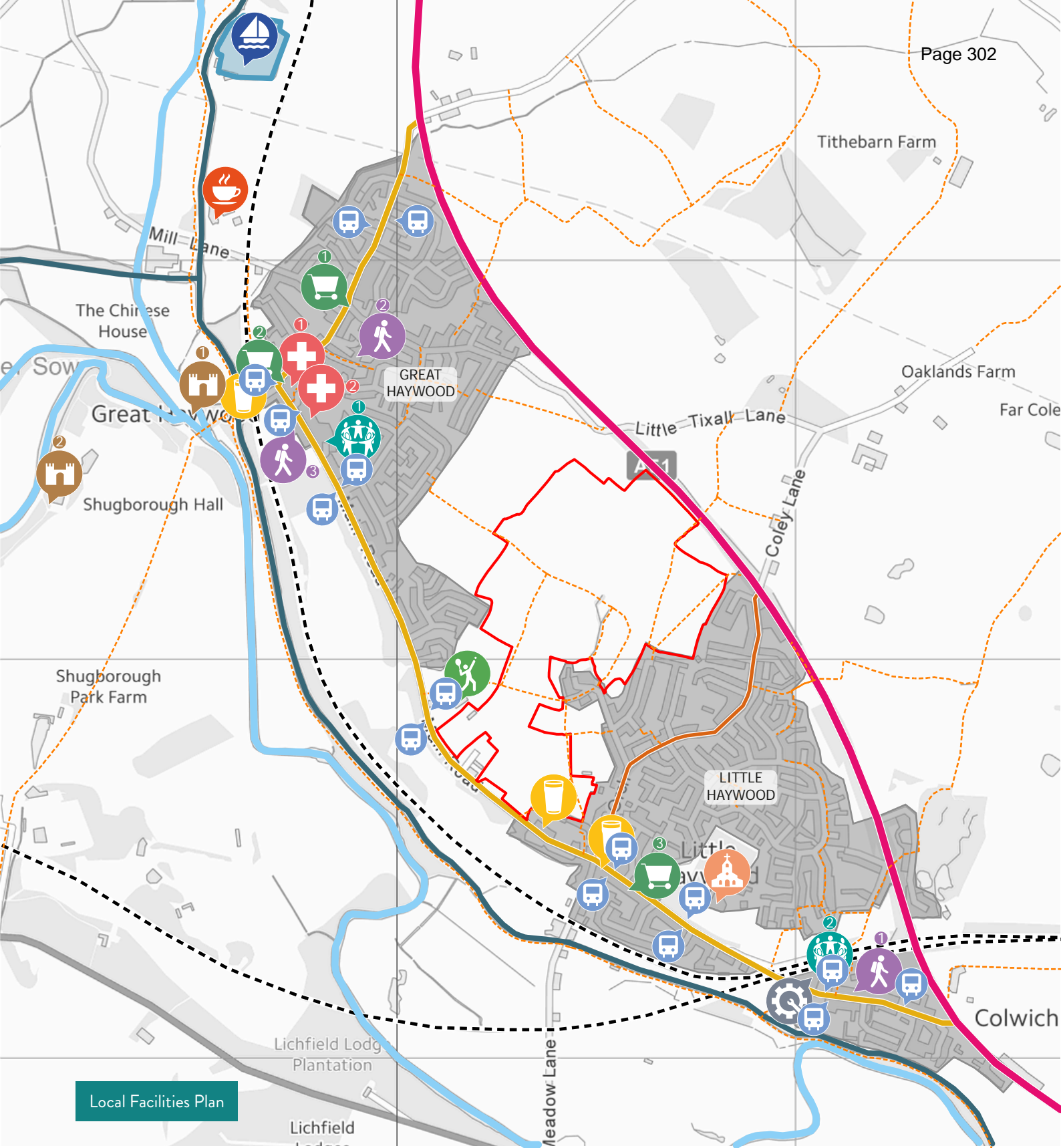
- On Main Road, approximately 0.2 miles, a 3 minute walk south of the Site is served by the 11S, 550, 825 and 828 routes.

The 825 is the main bus route and runs between Lichfield and Stafford via Rugeley with a daytime frequency of approximately every half an hour.

The closest railway stations to the Site are Rugeley Trent Valley and Rugeley Town and can be reached by a 9 minute and 11 minute drive respectively. Both stations offer regular services to London Euston via Nottingham, Crewe and Birmingham International via Birmingham New Street.

LOCAL FACILITIES AND SERVICES

Type	Description	Walking Distance	Walk / Cycle Time
Education	St. John's RC Primary School	1.4 km / 0.9 miles	17 minutes / 4 minutes
	Colwich Primary School	1.0 km / 0.6 miles	10 minutes / 3 minutes
	Anson CofE Primary School	1.1 km / 0.7 miles	12 minutes / 3 minutes
Healthcare	Catshill Village Surgery	1.1 km / 0.7 miles	12 minutes / 3 minutes
	Catshill Clinic	1.1 km / 0.7 miles	12 minutes / 3 minutes
Food Retail	SPAR and Post Office	1.4 km / 0.9 miles	17 minutes / 4 minutes
Pubs, Cafes, Restaurants and Leisure	The Red Lion	0.5 km / 0.3 miles	6 minutes / 1 minute
	The Lamb and Flag	0.6 km / 0.4 miles	7 minutes / 1 minute
	Clifford Arms	1.0 km / 0.6 miles	10 minutes / 3 minutes
	Great Haywood Sports & Social Club	0.8 km / 0.5 miles	8 minutes / 2 minutes
	Colwich and Little Haywood Village Hall	1.3 km / 0.8 miles	15 minutes / 4 minutes
	Canalside Shop and Cafe		



Local Facilities Plan

- | | | | |
|--|---|---|---|
|  Site Boundary |  Schools
1. St Johns RC Primary School
2. Colwich Primary School
3. Anson Primary |  Shops
1. SPAR - Great Haywood
2. Your Local Day-Today Shop
3. Little Haywood General Store |  Station Garage |
|  Urban Areas |  Public Houses |  Historic Sites
1. Essex Bridge
2. Shugborough Hall |  Skate Park and Multi-use Games Area |
|  Public Rights of Way |  Medical Centres / Pharmacies
1. Alphega Pharmacy
2. Hazeldene House Surgery |  Community Halls
1. Great Haywood Memorial Hall
2. Colwich and Little Haywood Village Hall |  Bus Stops |
|  A51 |  Great Haywood Marina |  St Mary's Abbey, Colwich |  Canalside Farm Shop and Cafe |
|  Main Road | | | |
|  Coley Lane | | | |
|  Railway Lines | | | |
|  Rivers | | | |
|  Trent and Mersey Canal | | | |

3. PLANNING POLICY CONTEXT

ADOPTED DEVELOPMENT PLAN

The adopted development framework for Stafford Borough Council comprises the Local Plan Part 1 (June 2014) (LP1) and the Local Plan Part 2 (January 2017) (LP2). The Site is also located within the made Colwich Neighbourhood Plan (NP) area (November 2016).

The Site is not allocated for any land uses but there are areas of 'Local Green Space' within the Site (NP Policy LGS4) and there is a Staffordshire Historic Environment Record (HER number 20096 - Ridge and Furrow, Colwich) in the northern part of the Site. The Site is adjacent to the settlement boundaries of Great Haywood and Little Haywood and the 'Great Haywood & Shugborough' and 'Colwich & Little Haywood' Conservation Areas. The Site is outside of the Green Belt and Cannock Area of Outstanding Natural Beauty.

EMERGING DEVELOPMENT PLAN

The Council is now producing a new Local Plan which will cover the period between 2020-2040.

The Site was submitted to the Council during the Call for Sites process in autumn 2019. The Council is now consulting on the Issues and Options version of the new Local Plan (January – April 2020). This document sets out the potential housing requirement and growth options for the Borough and it also proposes a revised settlement hierarchy. In the LP1 and LP2, Great Haywood and Little Haywood are identified as 'Key Service Villages', in the new Local Plan they are identified as 'Large Settlements'. The settlements continued to be identified as a couple of the most sustainable settlements in the Borough.

Little Haywood has been identified by the Council as having taken the lowest amount of growth (1.2%) of any of the Key Service Villages since 2011. As one of the most sustainable locations in the district we consider that there is scope for further housing growth to be considered at Little Haywood.

When considering Little Haywood, the options for expansion are limited to the north of the village given the barriers provided by the A51 to the east and the Registered Park and Gardens of Shugborough Hall to the west.

The timescales for the production of the new Local Plan are as follows:

- Issues and Options (closes 21st April 2020)
- Preferred Option (January 2021)
- Publication (June 2021)
- Submission (December 2021)
- Examination (March 2022)
- Adoption (October 2022)

STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENT

The southern part of the Site has been assessed in the SHLAA separately (Site ID COL10) as well as being assessed as part of the whole Site (Site ID COL13).

COL10 has been assessed as being available and achievable and has scored amber for suitability due to the Site being adjacent to the existing settlement boundaries of Great Haywood and Little Haywood. The key constraints identified within the Site are Tree Preservation Orders, Public Right of Way and Local Green Space designations. The Site abuts two conservation areas, a site of biological importance, area of outstanding natural beauty, a Historic Environment Record to the east and south and a Historic Environment Record abuts the northern boundary.

COL13 has also been assessed as available and achievable and has scored amber for suitability due to the Site being adjacent to existing settlement boundaries. The same suitability constraints as COL10 are identified for COL13.

However, the SHLAA also states that “the portion of the site not designated as Local Green Space in the Colwich Neighbourhood Plan is potentially developable based on the compliance with Criteria C5 of the Local Plan and Paragraph 71 of the NPPF”.

In regards to the technical constraints identified on the sites COL10 was previously the subject of two planning appeals and the Inspector’s did not identify any technical constraints which would result in the Site not being suitable for residential development. Therefore, we consider that the technical constraints can be overcome through the design of the Site. In regards to the Local Green Space designations, this has been considered further in the technical chapter of this document and have been taken into consideration when producing design responses for the Site.

COLWICH NEIGHBOURHOOD PLAN - LOCAL GREEN SPACES

Policy CE2 within the NP designates 9 Local Green Space sites, 4 of which are located within the Site (LGS4, LGS5, LGS6 and LGS8). The supporting text states that Local Green Space designations are a way to provide special protection against development for green areas of particular importance to local communities. The NP provides the following justification for why the Local Green Space areas within the Site are important to the community:

- LGS4 – there are public footpaths within the Site which offer views towards Cannock Chase. The NP also states that the Site is ‘rich in wild meadow species’ and there are a number of trees within TPOs.
- LGS5 – there is a public footpath running along the southern boundary which offers views of Great Haywood and Little Haywood as well as Cannock Chase. There are also trees protected by TPOs and a dew pond.

- LGS6 – the fields are considered to have historic significance to an adjacent Grade II Listed house and there are two public footpaths that cross the Site. The Site is part of a network of hedgerows and shrubs which are considered to be of importance by the local community for birds. The Parish Council would like to extend access for recreational purposes through the creation of a footpath linking this area to the rest of the footpath network.
- LGS8 – this site forms part of a medieval field system and has remnants of strip cultivation. There are two public footpaths that cross the Site which provide a link between Little Haywood and Great Haywood.

The NP considers that LGS8 and LGS4 are integral in maintaining the landscape setting and the historic character of this part of the Little Haywood conservation area.

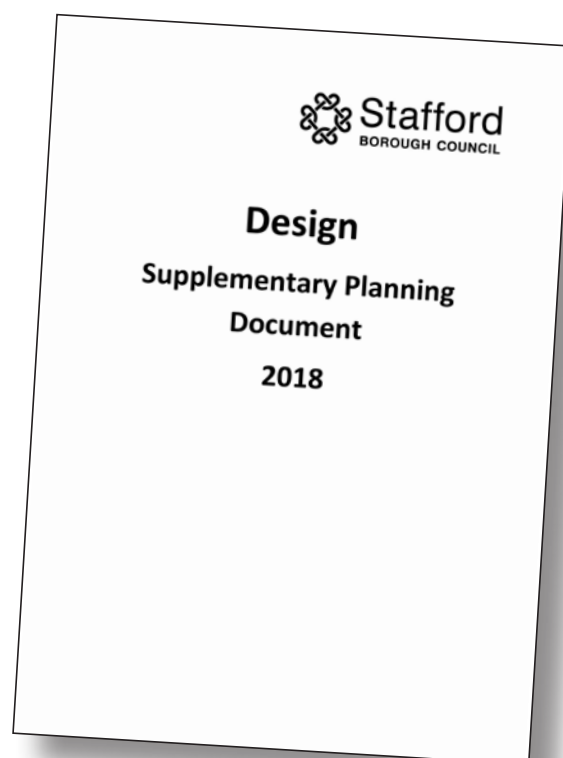
DESIGN GUIDANCE

Supplementary Planning Documents (SPDs) including Design Guidance at local authority level are also considered material in the planning process whilst national level design guidance is also important in informing the design response to the Site.

These documents from Stafford Borough Council and National Government have formed a key part of the design considerations throughout the development of the site proposals.

DESIGN SPD

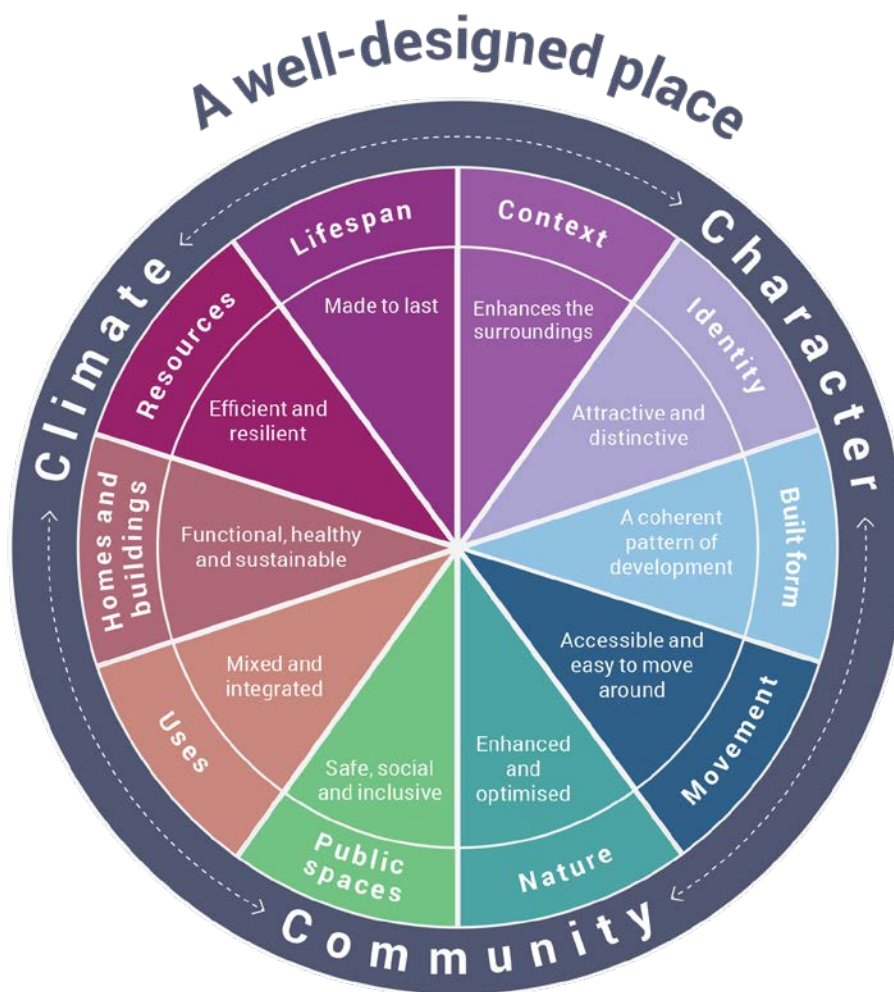
Stafford Borough Council's Design (2018) SPD contains extensive advice relating to sustainable development, layout, density, connectivity, amenity provision and objectives of urban design. The SPD also gives specific guidance on the size and layout of private amenity spaces.



Stafford Council Design SPD

NATIONAL DESIGN GUIDE

On a national level, the recently released National Design Guide (MHCLG, 2019) will be used to guide and develop the design approach. In particular, the ten key principles of good design have been used as a framework to shape the best practice design principles within this document. The contextually driven responsive approach will ensure a high design quality in the resultant development.



Key Design Principles, National Design Guide (MHCLG, 2019)

4. OPPORTUNITIES & CONSTRAINTS

The adjacent plan sets out the key opportunities and constraints identified for the Site and a summary is set out below:

OPPORTUNITIES

- There is an opportunity to reshape existing Local Green Spaces to provide additional connectivity along enhanced green corridors, new community amenities and better access to facilities in Great Haywood and Little Haywood.
- There is an opportunity to create a new usable green corridor along the north-western site edge, providing more open space for the local people whilst acting as a buffer to prevent coalescence with Great Haywood.
- There is an opportunity to create a new east-west green corridor across the Site to link the two settlements for pedestrians and cyclists, increasing accessibility to local facilities and services as well as the new proposed green spaces.
- The Site has an established network of landscape, hedgerow, trees, wildlife corridors and green spaces which the development proposal will be able to utilise and respond to.
- The Site is well located for pedestrian and cycle accessibility to local services and facilities in nearby Little Haywood and Great Haywood.
- There are a wide number of connections into the wider landscape and surroundings existing on the Site in the form of Public Rights of Way which will be maintained and enhanced as part of the development.
- The Site is located entirely within EA Flood Zone 1 and therefore is not liable to flooding. Any surface water flooding will be mitigated with an appropriate attenuation and SUDS strategy.
- The Site is sloping with the topography able to be utilised to inform the location of attenuation ponds.
- The Site is within one land ownership without any known constraints to delivery.

CONSTRAINTS

- There a number of designated local green spaces which will need to be considered and either retained or compensated for as part of the proposals. At present there are approximately 11ha of designated Local Green Space on the Site.
- The Site is located in relatively close proximity to Great Haywood and care will need to be taken at the design stage to avoid coalescence and maintain a buffer between Great Haywood and Little Haywood.
- The Site is sloping with gradient restricting development in places.
- Consideration should be given to the registered park and garden and area of outstanding natural beauty to the south.

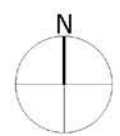


Opportunities and Constraints Plan

- | | | |
|-------------------------------------|---------------------------|----------------------------|
| Site Boundary | Existing Vehicular Routes | AONB |
| Potential Access | Existing Railway | Ancient Woodland |
| Potential Pedestrian / Cycle Access | Existing Vegetation | Registered Park and Garden |
| A51 Noise | Flood Zone 3 | Listed Buildings |
| Existing Allotment | Flood Zone 2 | Local Green Space |
| Existing Local Centre | Public Right of Way | Conservation Area |

NOTE:

- Reference: 17/25920/REM. Reserved matters pursuant to permission 14/20886/OUT, outline development of 77 dwellings.
- Site 2 - Suggested note :Reference: 17/25898/REM. Reserved matters pursuant to permission 16/24235/OUT, outline development of 11 dwellings.
- Site 3 - Suggested note : Reference: 15/22347/REM. Reserved matters pursuant to permission 13/19534/OUT, outline development of 76 dwellings."



HERITAGE

The Site exists within a locality which has considerable heritage interest. Little Haywood has medieval origins, while Great Haywood was principally developed during the post-medieval period. Both villages contain a number of listed buildings: the church at Little Haywood is Grade II* listed, with the other listed buildings in the villages being Grade II. Immediately to the west of Great Haywood is the 16th-century Essex Bridge, a scheduled monument and Grade I listed building.

To the west of the Site is the Shugborough Estate, established in the early 17th century and subsequently developed into one of the country's finest designed parkland landscapes. The estate is a Grade I registered park and garden (RPG). The Shugborough Estate and the historic cores of Great Haywood and Little Haywood are incorporated into a single conservation area.

Despite this rich baseline, the proposed development will not intersect with, or cause physical damage to, any designated heritage asset, as all of those described above lie outside its boundary. Similarly, it is not anticipated to significantly alter the setting of the Shugborough RPG, or of the historic centre of either village, nor the listed buildings they contain. Changes to the setting of two Grade II listed buildings adjacent to the Site will occur, but this change is unlikely to amount to substantial harm. Any effects on the conservation area, arising from the northward expansion of Little Haywood into agricultural land, could potentially be mitigated through sensitive masterplanning.

LANDSCAPE

The Site does not lie within a nationally or locally designated landscape, however it does lie to the east of Cannock Chase Area of Outstanding Natural Beauty (AONB). From the more elevated parts of the Site to the east there are westerly views of the wooded Cannock Chase AONB and Shugborough Registered Park & Garden and local views of the settlement edge of Little Haywood. The Site is located immediately to the east of Shugborough Grade I Listed Registered Park and Garden separated by Main Street. Glimpsed views towards Main Street are possible from The Staffordshire Way promoted route. There are a number of Tree Preservation Orders across the Site and several Public Rights of Way (PRoW). Users of these PRoW are considered of high sensitivity.

In the wider landscape, long distance views are generally constrained by the enclosure provided by the mature trees and woodland within Cannock Chase to the west, built form within the adjacent villages of Little Haywood and Great Haywood to the north and south and the A51 to the east. The A51 arterial route is enclosed by mature vegetation which filters views of the Site from the open countryside to the east. There is a strong frontage created by existing properties on Main Street which encloses views to the western portion of the Site. However, the local public footpaths which run through the Site permit open views of the Site's interior and the local context, including views back towards the settlement of Little Haywood flanked by the woodland of Cannock Chase.

Visual receptors include vehicles travelling along Main Road, local roads within Little Haywood, users of the local rights of way network, particularly within the Site itself, but also within Cannock Chase AONB and Shugborough Estate (of very high sensitivity) and users of the promoted routes 'The Way for the Millennium' and 'The Staffordshire Way'.

Woodland, hedgerows and hedgerow trees are characteristic of the landscape and have some representation within the Site to varying degrees. The landscape fabric predominantly comprises pasture fields subdivided by managed hedgerows or post and wire fencing with regular mature trees.

ECOLOGY

An Ecological Desk study and walkover of the Site was undertaken in order to assess the ecological value of the Site and the potential for biodiversity enhancement through Site design.

Three international statutory designations (Cannock Chase SAC, Paturefields Saltmarsh SAC and Charley Moss SAC/Ramsar) and four national statutory designations (Rawbones Meadow SSSI, Stafford Brook SSSI, Baswich Meadows SSSI and Blithfield Reservoir SSSI) lie within the potential zone of influence of the Site. Additionally, there are five locally designated green spaces (areas demonstrably special to local communities either for ecological, historic or aesthetic reasons and recognised within the local plan) within the Site.

The intervening distance means that development at the Site is unlikely to have a direct impact on the statutory designations through anything other than a potential increase in recreational impact. Residential impact on Cannock Chase is covered by planning policy that requires financial contributions from developments within 8km of the SAC. Charley Moss is visited by permit only and will not be impacted by increased recreation. The other identified designated sites within the vicinity may also be susceptible to recreational pressure, however the provision of a large amount of public open space within the Site in the form of a community park is likely to minimise such effects. This community park creation will also provide an attractive, rural setting for the development as well as higher quality habitat in the local area to enhance biodiversity, thus minimising the impacts of the loss of the Local Green Space Areas within the Site.

The Site itself is an extensive system of grazed pasture fields delineated by hedgerows, many of which are defunct and species poor. There are two ponds on site and two others within 250m. There is also a stream in the centre of the Site with steep wooded banks. Further detailed botanical surveys will confirm the ecological value of the pasture

and hedgerows but some of the fields and hedges are likely to be of local value along with the ponds and the stream, whilst a majority of the improved pasture fields and defunct hedgerows will be of limited ecological value.

The Site has the potential to support badgers, breeding birds, foraging bats, amphibians including great crested newts, common and widespread reptiles and mammal species of conservation concern, such as hedgehogs. Further survey work is recommended to confirm the presence or absence of these species; however, based on the existing habitats and the masterplan proposals, even if present they are unlikely to pose an 'in principle' constraint to development.

The masterplan for the Site incorporates habitats of higher ecological value within retained and enhanced areas of Green Infrastructure (GI). The creation of a county park provides opportunity to create high quality grassland in line with the identification of the Site within a 'grassland opportunity area'. This high quality habitat will provide important ecological corridors linking the ponds on Site with those nearby thus creating an important habitat network for many species including great crested newt which are known to be in the area. The retention/buffering of many of the internal and boundary hedgerows, as well as selective 'gap' planting with native hedgerow species of local provenance and long-term management for the benefit of wildlife will ensure ecological connectivity within and around the Site is maintained. Where other GI is created, soft landscape enhancements such as wildflower grassland planting and creation of Sustainable Drainage Systems (SuDS) features designed to benefit biodiversity through appropriate design, planting and management will help to achieve a net gain in biodiversity.

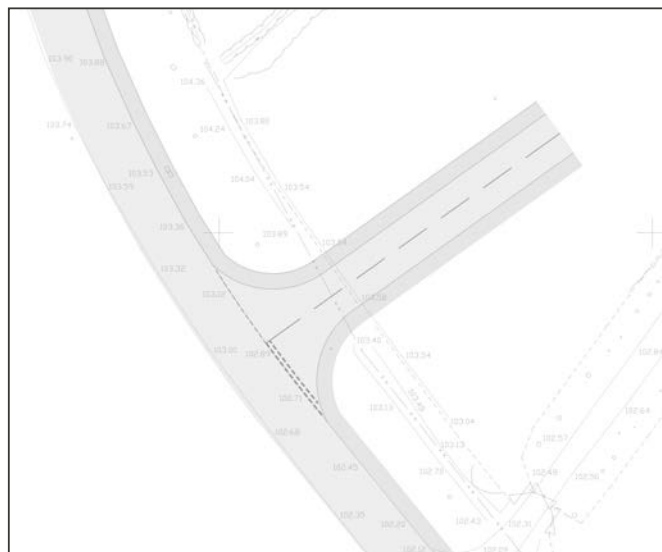
ACCESS AND HIGHWAYS CONSIDERATIONS

The Site is located within a walking distance of local Public Right of Way footpaths, advisory cycling routes and canal towpaths, which enable access to a wide range of local amenities; including health, education, retail and leisure facilities all within the recommended walking and cyclist distances. Bus services operating within an acceptable distance of the Site provide prospective residents with frequent connections to Great Haywood, Little Haywood, Rugeley and Stafford.

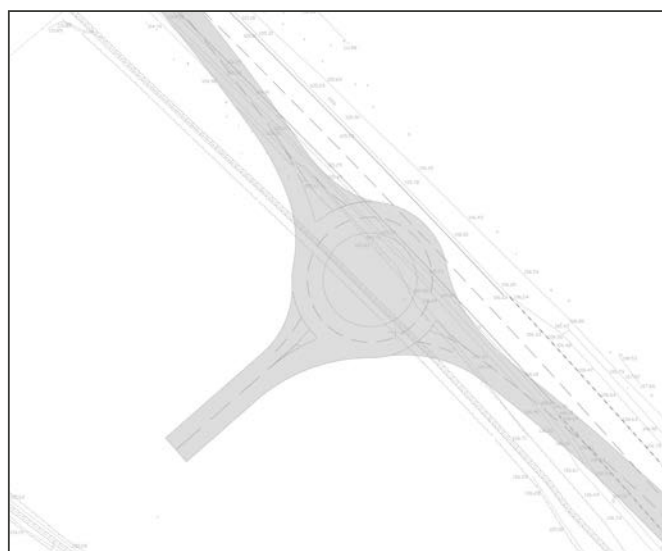
Taking into account the trip rates utilised as part of an approved adjacent residential development, it is envisaged that the proposed development would generate in the region of 209 - 246 and 252 - 298 two-way trips during the traditional highway AM and PM peak periods respectively, depending on the density of the Site. Further assessment will need to be undertaken as part of a future TA to understand any off-site junctions where capacity assessment may be necessary.

It is envisaged that a new priority junction connecting the southern parcel (Phase 1) to Main Road can be provided c. 80m northwest of The Butts. The proposed access will follow the precedent set by that of a prior application (ref: 15/22731/OUT) for a residential development at this location. Access into the northern parcel will be provided via a new roundabout from the A51. On account of the level variations, it is envisaged that this will require some land take within the Site, which will need to be factored into masterplanning and density proposals. A central spine road between the two accesses will provide a vehicular route through the Site, connecting the two residential parcels.

Overall it is envisaged that the necessary infrastructure to support a residential development of c. 400 dwellings is achievable. Furthermore, as a result of the development of several adjacent parcels of land (at varying stages of completion) it is envisaged that the potential future development could serve to enhance sustainable connectivity between Little Haywood to the southeast, and Great Haywood to the northwest of the Site.



The proposed new road junction onto Main Road (the southern site access) (Source: Mode)



The proposed new roundabout junction on the A51 (the northern site access) (Source: Mode)

NON-MOTORISED USER CONNECTIVITY

Additional Non-Motorised User (NMU) accesses could be provided onto Back Lane and Coley Lane, in order to enhance the existing options for pedestrians and cyclists; providing access onto quieter secondary residential streets and catering for one of the primary desire lines from the Site into Little Haywood. As part of the masterplanning and future vision for the Site, the potential to upgrade the existing PRow routes to all weather surfaced shared linkages with lighting should be explored, in order to provide a suitable direct link between Great Haywood and Little Haywood.



Photos showing the existing NMU access points into the Site along the east-west PRow.

5. DEVELOPMENT PROPOSALS - OPTION 1

A number of potential development options have been prepared for the Site following a consistent design framework whilst varying in scale and position to deliver different development options as necessary to suit demand or approach. Options 1 and 2 represent a partial delivery of the Site whilst Option 3 presents comprehensive proposals for the entire site.

GUIDING PRINCIPLES

This development option represents a relatively small intervention of residential development in the southern portion of the Site, accessed from Main Road and extending west from Little Haywood. This proposal creates enhanced public open space on the rest of the Site and largely retains the existing areas of designated local green space whilst compensating for that which is lost. The Concept Masterplan shows the key guiding design principles which underpin the approach to the Site:

- Pockets of development are encompassed within high quality landscape and public open space.
- Primary movement routes permeate the development to ensure connectivity and sustainable transport options.
- Green fingers follow existing landscape features creating highly attractive and safe green movement corridors.
- Areas of attenuation are designed so as to contribute to the drainage strategy, ecological value and provide high quality open space and are informed by the Site topography.

DELIVERY BENEFITS

- This option proposes 2.2 ha (5.4 acres) of Residential Development, delivering approximately 70 new homes at 32 dwellings per hectare.
- This option proposes 3.2 ha (7.9 acres) of Public Open Space, including the relocation of 1.9 ha of Neighbourhood Plan designated Local Green Space.
- There is an existing PRoW which runs up the Site's eastern boundary which will be retained and enhanced as part of the development.

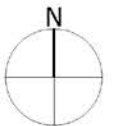


- Site Boundary
- Residential Development
- Primary Movement Route
- Attenuation Area
- Public Open Space



Concept Masterplan

- Site Boundary
- Primary Site Access
- Main Routes
- Walking / Cycling Routes
- SUDs
- Residential Development Area
- Existing Trees and Hedgerows
- Public Open Space
- Green Corridor
- Neighbourhood Plan Local Green Space



OPTION 2

GUIDING PRINCIPLES

This development option shows a larger area of residential development extended from the south into the centre of the Site. It is accessed from Main Road and again is an extension of Little Haywood along its western edge. The rest of the Site will be enhanced open space, retaining much of the existing areas of designated local green space and compensating for that which is lost. The Concept Masterplan shows the key guiding design principles which underpin the approach to the Site:

- Pockets of development are encompassed within high quality landscape and public open space.
- Primary movement routes permeate the development to ensure connectivity and sustainable transport options.
- Green fingers follow existing landscape features creating highly attractive and safe green movement corridors.
- Areas of attenuation are designed so as contribute to the drainage strategy, ecological value and provide high quality open space and are informed by the Site topography.
- Large areas of public open space will be retained and created as part of the development, exceeding in size the area of currently designated area of local green space.

DELIVERY BENEFITS

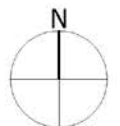
- This option proposes 6.7 ha (16.6 acres) of Residential Development delivering approximately 215 new homes at 32 dwellings per hectare.
- This option proposes 6.5 ha (16.1 acres) of Public Open Space, including the relocation of 3.3 ha of Neighbourhood Plan designated Local Green Space.
- Existing PRoWs which cross the Site will be retained and enhanced, improving connectivity for Pedestrians and Cyclists between the Site and Little Haywood.



- Site Boundary
- Residential Development
- Primary Movement Route
- Attenuation Area
- Public Open Space



- | | |
|--|--|
|  Site Boundary |  Existing Trees and Hedgerows |
|  Primary Site Access |  Public Open Space |
|  Main Routes |  Green Corridor |
|  Walking / Cycling Routes |  Neighbourhood Plan Local Green Space |
|  SUDs | |
|  Residential Development Area | |



OPTION 3

GUIDING PRINCIPLES

Under this option, we seek to provide a more comprehensive residential scheme which would seek to deliver open space and Local Green Space improvements as part of a larger residential development whilst providing enhanced connectivity for pedestrians and cycles across the Site between Little Haywood and Great Haywood. This proposal also incorporates two vehicular accesses, one from Main Road to the south and one from the A51 to the north. The Concept Masterplan shows the key guiding design principles which underpin the approach to the Site:

- Pockets of development are encompassed within high quality landscape and public open space.
- Primary movement routes permeate the development to ensure connectivity and sustainable transport options.
- Green fingers follow existing landscape features creating highly attractive and safe green movement corridors.
- Areas of attenuation are designed so as contribute to the drainage strategy, ecological value and provide high quality open space and are informed by the Site topography.
- Large areas of public open space will be retained and created as part of the development, exceeding in size the area of currently designated area of local green space.






LOCAL GREEN SPACE REMODELLING

Within the Neighbourhood Plan there are approximately 11.0 ha (27.2 acres) of Local Green Space designated on our site. Our proposals provide for 14.9 ha of public open space, an enhancement of approximately 3.9 ha over and above the current Local Green Space provision and also above the local Public Open Space requirement. The enhancements to accessibility have made this remodelled Local Green Space more connected and more usable with greater amenity whilst providing access through to other local facilities.

DELIVERY BENEFITS

- This option proposes 13.3 ha (32.9 acres) of Residential Development delivering approximately 425 new homes at 32 dwellings per hectare.
- This option proposes 14.9 ha (36.8 acres) of enhanced public open space, including the relocation of 4.8 ha of Neighbourhood Plan designated Local Green Space.
- This option provides an opportunity to deliver a comprehensive solution to Local Green Space improvements. It could enable the delivery of two green corridors moving NE to SW and NW to SE providing enhanced linkages and public open space opportunities for existing and future residents of both Little Haywood and Great Haywood.

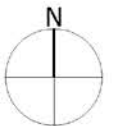


	Site Boundary
	Residential Development
	Primary Movement Route
	Public Open Space
	SUDs



Concept Masterplan

- Site Boundary
- Primary Site Access
- Main Routes
- Walking / Cycling Routes
- SUDs
- Residential Development Area
- Existing Trees and Hedgerows
- Public Open Space
- Green Corridor
- Neighbourhood Plan Local Green Space



ALTERNATIVE OPTION



Concept Masterplan

This alternative option proposes the development of only the northern area of the Site and is an extension to Great Haywood rather than Little Haywood.

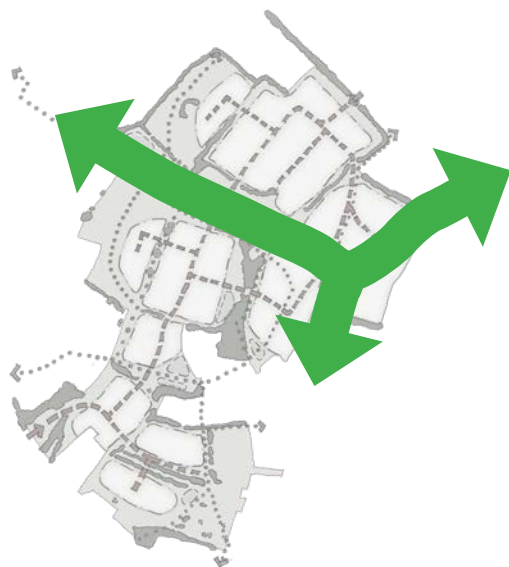
DELIVERY BENEFITS

- This option proposes 4.2 ha (10.3 acres) of Residential Development delivering approximately 135 new homes at 32 dwellings per hectare.
- This option proposes 3.7 ha (9.1 acres) of enhanced public open space, this option retains the existing Neighbourhood Plan designated Local Green Space in its entirety.

 Site Boundary	 Existing Trees and Hedgerows
 Primary Site Access	 Public Open Space
 Main Routes	 Green Corridor
 Walking / Cycling Routes	 Neighborhood Plan Local Green Space
 SUDs	
 Residential Development Area	



6. CONNECTIVITY



Two key green corridors form part of the wider public open space strategy within the proposal whilst they also inform the new, enhanced pedestrian and cycle routes which alongside the existing Public Rights of Way on site, make up the Site wide connectivity strategy for Option 3.

EAST-WEST GREEN CORRIDOR

The east-west green corridor creates a large area of public open space, including retained designated Local Green Space land and enhanced public open space for community use. In addition, the east-west corridor will provide an enhanced pedestrian and cycle movement route connecting Little Haywood to Great Haywood through the proposed development. The width of this Green Corridor varies from approximately 140m to 40m.



NORTH-SOUTH GREEN CORRIDOR

The north-south green corridor along the Site's western edge not only creates an accessible, usable green route for movement and amenity from the north to the south of the Site but is also an important buffer against coalescence, maintaining separation between Little Haywood and Great Haywood in perpetuity regardless of potential future developments in the area. The width of this Green Corridor varies from approximately 100m to 55m.

PEDESTRIAN AND CYCLE CONNECTIVITY

As part of the development, new Pedestrian and Cycle routes will be created and existing ones will be enhanced and better defined in order to improve connectivity for the existing communities in Great Haywood and Little Haywood as well as the new community on the Site. These routes retain, enhance and link into the existing public rights of way.



7. GREEN CORRIDORS AND OPPORTUNITIES FOR LOCAL GREEN SPACE ENHANCEMENTS

As part of Development Proposal Option 3 we have the potential to provide a range of Green Corridor and Local Green Space enhancements that we would invite the community to engage in selecting. These will serve not only the new residential community but also the the existing communities of Little Haywood and Great Haywood.

Potential to integrate play areas, recreational routes and other community facilities within new connected green corridors



RECREATIONAL CYCLE ROUTES

Recreational cycle routes are cycle routes that offer users the opportunity to cycle without traffic, often along scenic routes, closer to nature. These are important to give people an opportunity to cycle from a health and wellbeing perspective as well as giving children a safe space to cycle and within the context of a residential development, a recreational cycle route through a site can also be useful for visiting local places and people without the need to use roads.



Recreational Cycle Routes are important for learning to cycle (Source: Sustrans)



TRIM TRAILS

Trim Trails are directional outdoor play equipment/climbing frame routes designed to make traversing through a space or along a path more fun, interactive and healthy. There are numerous types of equipment which might be included in a trim trail including monkey bars, balancing poles and stepping stones. Easy access to this activity equipment will help to keep the local community fit and healthy.



Example of equipment on a Trim Trail



ECOLOGY / WILDLIFE HABITATS

Ecology and Wildlife Habitats are specifically designed features to encourage Ecology and Wildlife to flourish on a site. These can be spaces to encourage certain flora growth (such as a wildflower meadow) or fauna (such as a bird house, hedgehog hutch or pond). They are important for environmental reasons, encouraging and maintaining biodiversity whilst also important for our own health and wellbeing with interaction with nature and ecology a scientifically proven health benefit to humans.



Example: A hedgehog 'campsite' (Source: Wales Online)



COMMUNITY PARK

Community Parks can bring communities together. Accessible community parks can be multi-functional in their design, allowing for a variety of uses and users to enjoy them. The parks can vary in their formality, from very informal green areas with mown grass paths through them to more formal equipped areas with picnic benches and play equipment. Community Parks give the local population an area for recreation, somewhere to play and somewhere to walk, jog and cycle through green areas improving their health, fitness and wellbeing.

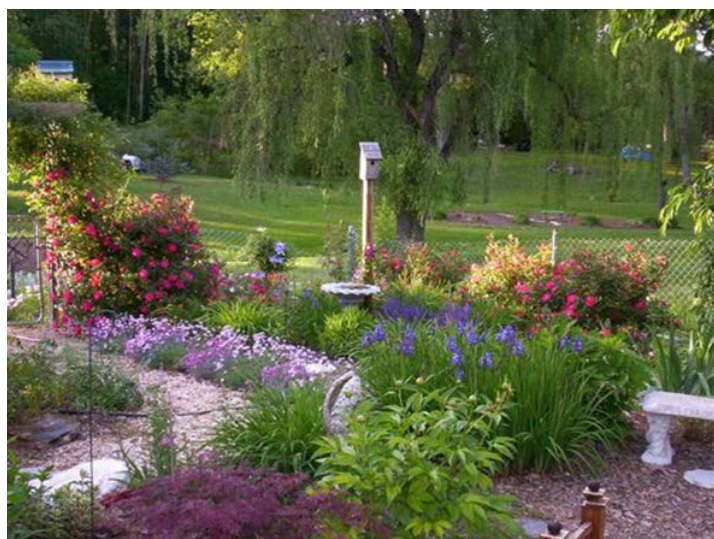


A Community Park offers great opportunities to socialise and exercise, improving the health and wellbeing of local residents.



MEMORIAL GARDEN

A Memorial Garden provides a place of tranquility and reflection for the local community, a peaceful environment for contemplation with the wellbeing benefits created by being in the open air and in touch with nature. The proposed memorial garden would be highly accessible with access off Main Road and some car parking provision.



A memorial garden creates a peaceful environment for reflection and contemplation.

8. DELIVERING A WELL DESIGNED PLACE

The development has been designed to adhere to best practice place-making principles. It adheres to the guidance within the National Design Guide.

Lifespan

The proposal has been designed with longevity in mind to accommodate potential additions and adaptations in the future. Open space integrated within the development will be communal and encourage a sense of ownership of shared space among residents to ensure their long term amenity.

Resources

The development makes efficient use of land available and is also capable of adapting to alterations in climate, technological advancement and market changes.

Homes and Buildings

The development has been designed to accommodate a range of housing types and tenures to provide for people at every stage of life.

Uses

The development will incorporate a variety of community uses in addition to housing, including enhanced public open green space integrated within the residential scheme.

Public Spaces

Public open space created as part of the development will be integrated within the scheme and overlooked by housing to create spaces which are surveilled and secure. Green corridors permeate development blocks ensuring that open space is accessible to all throughout the Site.



Context

The development will enhance the connectivity and permeability of the surrounding area through the creation of new movement routes.

Identity

The strong relationship between built form and areas of open space in the development give it a strong character that is attractive, identifiable and Site specific.

Built Form

Built form throughout the development responds to Site constraints and opportunities, taking advantage of elevation, green links and movement routes to create a coherent pattern of residential development.

Movement

The development proposes a strong heirachy of roads for coherent vehicular movement through the Site as well as new and enhanced pedestrian and cycle routes.

Nature

As part of the development, existing landscape will be retained where possible with existing trees and hedgerows permeating development blocks. Existing and proposed landscape and planting will also be made more accessible through the creation of extensive new public open green space.



In accordance with the Key Design Principles, National Design Guide (MHCLG, 2019)

9. BENEFITS SUMMARY & DELIVERABILITY

The development proposals will provide a deliverable, high quality, accessible and connected environment in which to live, rest and play.

These proposals also have the potential for huge benefits for the local area, including:



Public Open Space and Landscaping – extensive public open space including large new usable green corridors, designed around the local landscape with opportunities for the community to be engaged in the review and selection of Local Green Space enhancements which could include comprehensive investment in a new community park.



New Homes – new high quality homes, both market and affordable homes, to meet the local needs, providing growth at Little Haywood which as a Key Service Village is one of the most sustainable settlements in the Borough.



Responsive Design – a carefully considered design which makes use of the local landscape and opportunities afforded by the Site and is both responsive to it and contextually appropriate with opportunities to support the vitality and viability of Little Haywood and Great Haywood existing services and businesses.



Permeability – a legible and accessible Site which champions sustainable modes of travel, use of new facilities and sustainable lifestyles.



Accessibility and Sustainability - At the centre of the design ethos for the proposals are accessibility and sustainability, to support health and wellbeing and a sensitive climate response.



Recent high-quality Bellway Homes development, Studham



Recent high-quality Bellway Homes development, Saxon Fields

BELLWAY HOMES EXPERIENCE

Bellway is an FTSE 250 major PLC housebuilder delivering just over 10,800 new homes across the UK last year. They are a five star housebuilder as a result of emphasis on build quality, customer care and health and safety, and build and sell high quality homes to suit local housing styles as well as providing social housing to housing associations.

Since their beginning over 70 years ago, Bellway now operate from 22 trading divisions which are located in the main population centres in England, Scotland and Wales. This structure enables their divisional management teams to use their locational knowledge and working relationships to buy land, design, build and sell homes which are attractive to their customers and help to build local communities.

Bellway control this highly sustainable site in Little Haywood. Their experienced multi-disciplinary consultant team have assessed the Site and consider it is available, suitable and developable and can therefore provide a deliverable site of new homes including affordable housing and other potential community uses. The landowners have carefully chosen Bellway as their development partner to ensure a positive legacy locally and seek to deliver community benefits too.

Bellway are fully committed to building and delivering a sustainable development for Little Haywood and would like to work with the Council and the community to make this happen.





[REDACTED]

[REDACTED]

9th December 2022

Bellway Homes Limited
BY EMAIL ONLY

**REF: LAND ADJACENT TO STONE HOUSE FARM, GREAT AND LITTLE HAYWOOD,
STAFFORDSHIRE – COL10 AND COL13**

The purpose of this Education Landscape Review is to establish whether there is currently sufficient capacity in local schools for the pupils expected to be living on this development site, both currently, and in the future. This is in relation to a development of between 78-340 residential dwellings on land in Great and Little Haywood, Staffordshire.

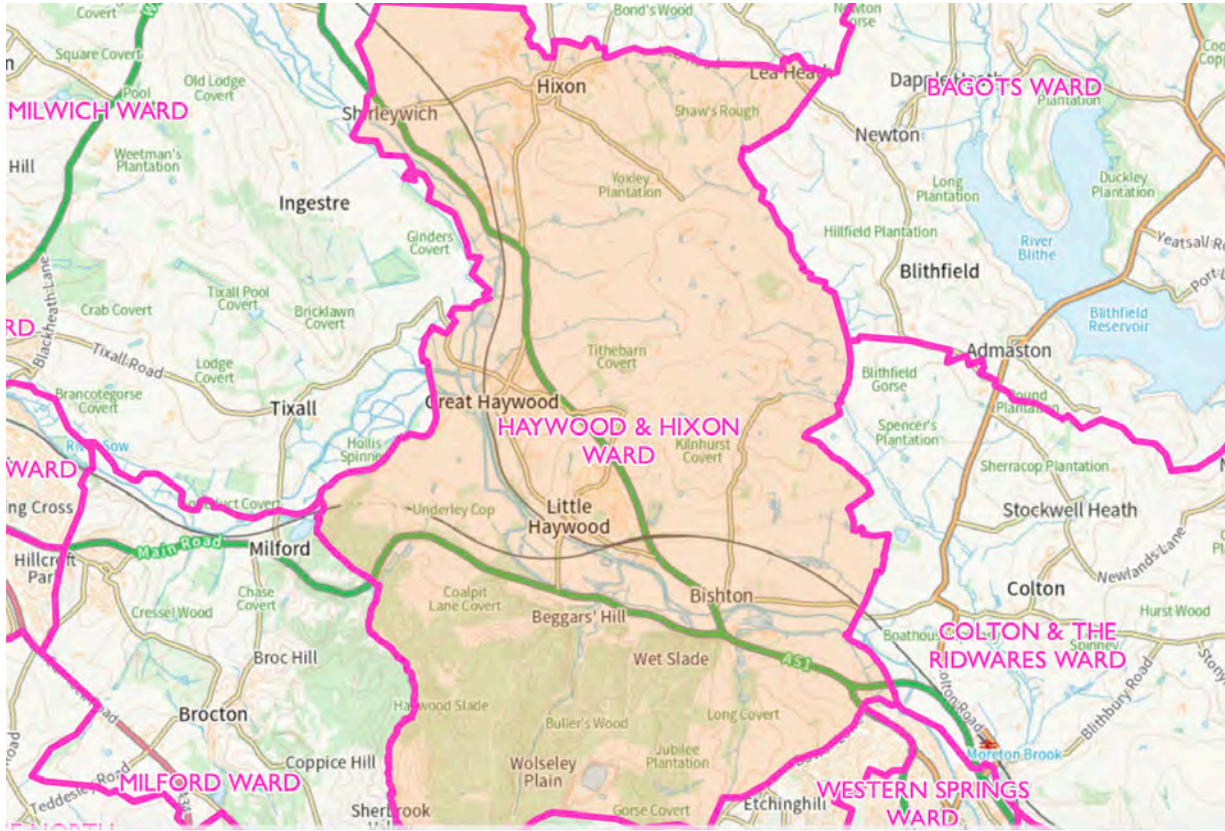
Stafford Borough Council (“SBC”) has assessed Bellway's sites as a smaller parcel (COL10) for 78 dwellings and a wider parcel (COL13) for 380 dwellings. Bellway Homes is promoting COL13 for around 425 dwellings.

The entire site boundary can be seen below in Map 1:



Map 1: Approximate Development Site

The development is within the Haywood and Hixon Ward (“the Ward”) within the Stafford Borough Council (“SBC”) planning area. The Education Authority for the area is Staffordshire County Council (“SCC”). The Ward boundaries can be seen below in Map 2:



Map 2: Haywood & Hixon Ward Boundary

SBC does not currently operate a Community Infrastructure Levy (“CIL”). It is stated on their website¹:

Stafford Borough Council started to develop a CIL charging schedule in 2015 but it was put on hold due to changes in Government policy. It is anticipated that the work will re-commence as part of the review of the Local Plan.

For a planning obligation to be acceptable it must be necessary. In respect of an education planning obligation, to be necessary, there must be an insufficient number of places to accommodate the forecast number of children seeking a school place forecast to arise from the proposed development to which the obligation is linked. Thus, the obligation must be linked to a change (upwards) in the official number of school places.

The necessity requirement dictates that there must be the equivalent increase of the Capacity and Admission Number of a school that would serve the development. The Capacity of a school is published differently depending upon its type. The Admission Number is the number

¹ <https://www.staffordbc.gov.uk/community-infrastructure-levy-cil>

of places for each age group. For a maintained school (maintained by the local education and children’s services authority) it is the Net Capacity, and for an Academy/Free School it is set out in the Funding Agreement with the Education Secretary of State. This obligation on the Council should be stipulated in the Section 106. The same principles should be applied to the SEN contribution, if it is deemed appropriate. “Improving” educational facilities is not appropriate use of planning obligations. Pre-existing deficits, upgrades and maintenance issues are funded from different sources.

This document will undertake the following tasks: firstly, it will look at the child yield multipliers utilised by SCC in order to ensure that they are appropriate for the area; second, it will look at the planning obligation cost multipliers utilised by SCC to ensure they are in line with the national averages and the Department for Education’s (“DfE”) Guidance, Securing Education Planning Obligations (November 2019) which is endorsed by MHCLG PPG Paragraphs: 007 Ref ID: 23b-007-20190315 and 008 Ref ID: 23b-008-20190315; finally, it will look at the Education landscape, in order to establish whether planning obligations are appropriate and required under the CIL Regulations, specifically the tests of CIL Regulation 122. This note looks specifically at Primary and Secondary School provision (including Sixth Form), Early Years, and SEN provision, as SCC is likely to consider the need for funding towards all of these Educational elements.

It should be stated at this stage that SCC has highlighted potential capacity issues at Colwich Primary School, and The Hart Academy, which could impact development allocations COL10 (78 dwellings) and COL13 (340 dwellings) if there is an issue with these sites in that neither can be expanded. As will be discussed, Colwich Primary School is one of three that can serve the area, and The Hart Academy is not the linked Secondary School to the area. This will be expounded upon throughout this document.

To first discuss the child yield multipliers utilised by SCC:

Child Yield

Staffordshire County Council adopted their Education Infrastructure Contributions Policy² in March 2021. This Policy includes their most recent child yield multipliers, which are reproduced in the Table below:

² <https://www.staffordshire.gov.uk/Education/Schoolsandcolleges/PlanningSchoolPlaces/Information-for-developers/Planning-policy.aspx#Introduction>

Area	PPR per dwelling per Year Group		PPR per dwelling
	Primary	Secondary	Sixth Form
Stafford	0.03	0.03	0.03
	$0.03 \times 7 = 0.21$	$0.03 \times 5 = 0.15$	0.03

Table 1: SCC Child Yield Multipliers for the SBC Area

Stafford's child yield multipliers are the average for the county, with Cannock, Lichfield, and Tamworth seeing high expected yields. Utilising the child yield multipliers shown above in Table 1, against a development of circa 78 dwellings (COL10) would generate the following:

- $78 \times 0.21 = 16$ Primary School aged children (2 per Year Group);
- $78 \times 0.15 = 12$ Secondary School aged children (2 per Year Group); and
- $78 \times 0.03 = 2$ Sixth Form aged children.

Furthermore, SCC utilises a child yield of 0.09 pupils for early years, and 0.0042/0.0088 for Primary/Secondary SEN respectively. This would generate the following:

- $78 \times 0.09 = 7$ Early Years aged children;
- $78 \times 0.0042 = 0.33$ Primary SEN children; and
- $78 \times 0.0088 = 0.69$ Secondary SEN children.

Utilising the child yield multipliers shown above in Table 1, against a development of circa 340 dwellings (COL13) would generate the following:

- $340 \times 0.21 = 71$ Primary School aged children (10 per Year Group);
- $340 \times 0.15 = 51$ Secondary School aged children (10 per Year Group); and
- $340 \times 0.03 = 10$ Sixth Form aged children.

Furthermore, SCC utilises a child yield of 0.09 pupils for early years, and 0.0042/0.0088 for Primary/Secondary SEN respectively. This would generate the following:

- $340 \times 0.09 = 31$ Early Years aged children;

- $340 \times 0.0042 = 2$ Primary SEN children; and
- $340 \times 0.0088 = 3$ Secondary SEN children.

In each of these cases shown above, the child yield numbers discussed can be considered the “worst case scenario”, as this does not factor in any, for example, elderly residential accommodation, or one-bedroom dwellings; the more of any of these types of dwellings that reside on the development, the lower the child yield will be expected to be.

Net migration to new dwellings increases the number of pupils locally, but this need is predominantly focused in Reception Year in the Primary phase, and Year 7 in the Secondary phase. If a child is already in a Primary or Secondary School when they move on to this proposed development, they are very unlikely to change schools once habits have been formed. It is fair to say that a proportion of the children moving in to the new homes will already be in the school system, as a proportion of people moving in to new homes do not move far. There is also the consideration that a proportion of pupils will attend Independent Schools (there are at least 2 in Stafford, and 12 in the whole county). Therefore, the likely impact on the school system will be less than forecast, and should be focused in either Reception Year or Year 7, as any other year group would likely necessitate a change of school.

The DfE has produced best practice guidance entitled “Securing developer contributions for education”. A key point in the Guidance is that pupil yield factors should be based on up-to-date evidence from recent local housing developments. It is assumed that SCC has taken this in to account with their child yield multipliers. At its paragraph 15, the Guidance recommends costs to be based on the published ‘scorecards’. These are DfE published financial statements of school places delivered via extensions and new schools on an individual school and number of places basis, standardised to a regional factor of 1.00 and a common date. This is discussed further below.

EFM’s own forecast trajectory for this development is based on a different methodology and measures the likely number of new children resident. Of course, a proportion of households moving to new developments do not move very far and their children do not change schools. The EFM demographic model, also working at District level, identifies a 1-year peak, which initial work has suggested is greater than the SCC formula. SCC’s multipliers are broadly consistent with the averages of most EA’s across the UK, and are not excessive. In this instance, the EFM model serves merely to substantiate that the number of pupil places

associated with this development from the education authority is reasonable; the SCC child yield fulfils these criteria.

Cost Multipliers

The current SCC Policy states the following costs are utilised by SCC:

Phase of Education	Mainstream cost multiplier per pupil including weighting
Early Years/Nursery, First and Primary (including Infant and Junior schools)	£17,450
Middle	£20,738
Secondary and High	£24,026
Sixth Form	£24,026

Table 2: Cost per Pupil Place in SCC's administrative area

SCC's average cost for a new primary school place in the latest (2021) scorecard (which is the Department for Education's published list of school costs for all Education Authorities nationwide) is £20,481 per pupil place, with a new secondary school place at £24,800. On the basis of this, the figures in Table 2 can be accepted.

However, SCC has stated that their costs for building a new school in 2022 are the following:

Type of school	Size of school	Total Cost
First School	1FE	£ 6,141,359
First School	1.5 FE	£ 6,668,288
First School	2FE	£ 8,106,424
Primary School	1FE	£ 7,596,058
Primary School	1.5FE	£ 9,983,703
Primary School	2FE	£ 11,378,438

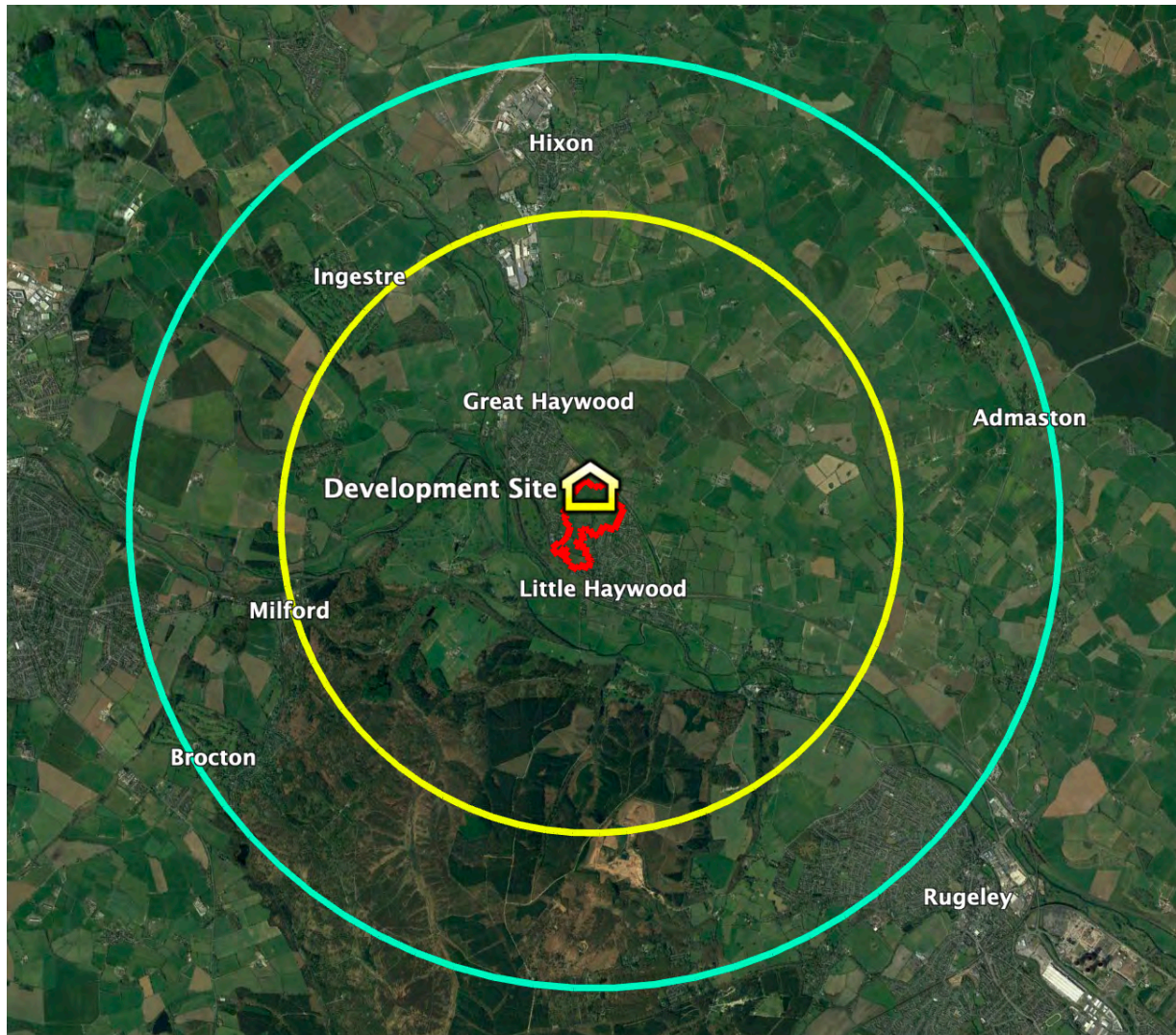
Table 3: SCC New School Costs

These figures place the cost of a new 2FE primary school at £27,091 per pupil place. This is 32% higher than the average new school cost per pupil recorded in the scorecard. There has been a 10% uplift in costs from the DfE to take in to account higher build standards (such as zero carbon) but even when factoring in inflation these costs seem on the high side.

The remainder of this Report will look at the Education landscape in order to establish whether additional school infrastructure projects are necessary in order to mitigate the impact of this development:

Education

In our assessment, we consider all Primary Schools within a 2-mile walking distance³, and all Secondary Schools that lie within a 3-mile walking distance of the development. The 2 and 3-mile criteria are the distances prescribed in the Education Act beyond which local authorities are required to provide/fund transport where the nearest available school is further away.



Map 3: Two- and Three-Mile Radius around the Development Site

³ Distances have been calculated based upon coordinates near to the development (52.828087, -1.996104). Once the development is built out, some parts of the site will be further/closer than shown.

It is the intention of the planning system and the provision of state-funded schools that the ideal mode of travel to and from school is walking or cycling. The NPPF made this plain at paragraph 38. Paragraph 38 has been replaced by paragraph 106A in latest iteration of the NPPF (July 2021) with an exhortation to minimise the number and length of journeys. The words ‘within walking distance of most properties’ have been removed.

The authority is required to make pupil forecasts to the Department for Education on a year of age basis by ‘school planning area’ and identify each school in the cluster and its capacity. The forecasts cover the period for which birth data is available. Forecasts covered by Section 106 agreements submitted separately to avoid double funding. For Primary School age pupils, the current published data runs to 2025/26 and for Secondary School aged pupils 2027/28. These are known as the School Capacity ("SCAP") returns. This is how Government allocates its funding for additional school places that are its responsibility to provide. The next publication of SCAP Forecasts (SCAP 2022) will be published in March 2023.

Schools should be operationally full to meet the financial audit requirement for best value from public assets. This is demonstrative of a properly functioning school system. School funding is predicated on the number of pupils that are on a school’s roll, so it is in the best interest of schools to maximise intake within their capacity. Accordingly, many schools take from a wide catchment area and some enrol over capacity.

The statutory rules on enrolment are that whilst schools may have a catchment area and ordered criteria for admissions, the rules only apply if the school is oversubscribed. Otherwise, whoever applies is admitted irrespective of where they live. This is known as ‘More Open Enrolment’. It fosters parental choice of school.

The overarching duty to provide sufficient schools and school places rests with central Government. (Education Act 1996 Section 11) The duty excludes those otherwise provided for (private education, home schooling, those in new housing with a Section 106/CIL in place (my emphasis)).

The education authority’s duty in such matters is to secure sufficient schools and school places for their area (Education Act 1996 Section 14). ‘For their area’:

The duties of a [local] education authority do not require the authority to secure the provision of schools for pupils from outside the area of the authority, even though it may be convenient for a pupil to attend a school in an area other than that in which he lives.

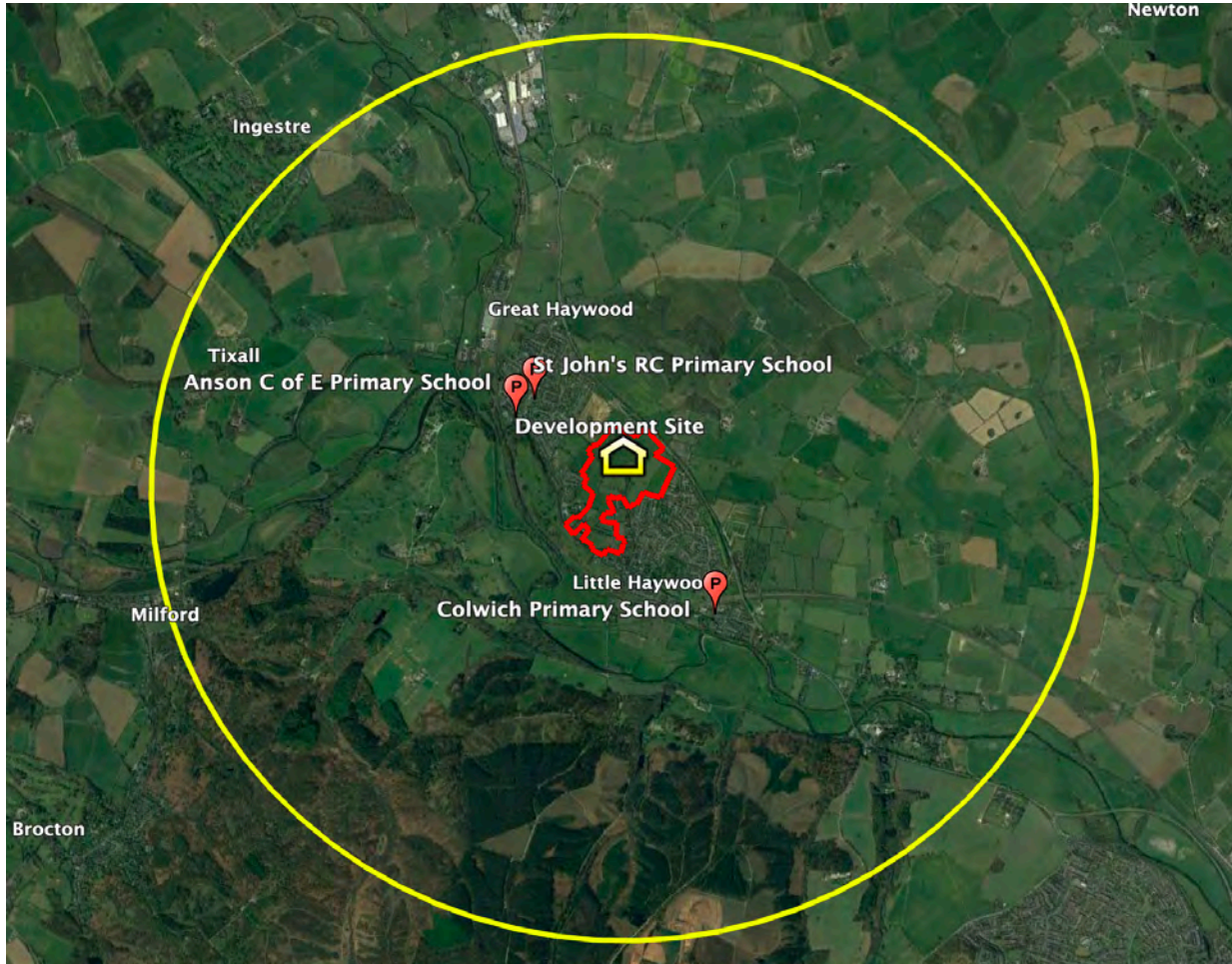
Within the State-funded school sector there are Community Schools funded by the local authority, and there are other providers than the local authority; these are Academies, Free Schools, the Voluntary Sector (e.g. Church Schools) and Foundation Schools. Academies and Free Schools are funded directly by Central Government; Church Schools and Foundation Schools are maintained by the local authority.

The provision of school places, where there is a shortfall, is made via a funding stream from the Department for Education (“DfE”) is known as Basic Need. Basic Need funding is allocated as ‘a number of pupil places times a unit cost’, differentiated by school phase and local building costs. Allocations are made on the basis of projected shortfalls in local School Planning Areas against current pupil numbers and the actual numbers of school places in that Planning Area. Each planning area is treated as a discrete area and shortfalls met through the allocation of resources. A surplus in one school planning area is not offset against another with a shortfall. In this case, providing housing in the Stafford Rural 2 Primary Planning Area (for whatever planning reason) will be reflected in the forecasts for the Stafford Rural 2 Primary Planning Area, and nowhere else.

Primary Education

There are at least three independent, state funded, non-selective schools accommodating primary school aged pupils within a two-mile radius of the development site. All are within an acceptable walking distance of the proposed new housing. The schools are within the SCC administrative area, and all are within the same planning area.

The location of the schools in relation to the development site can be seen below in Map 4:



Map 4: Schools within a two-mile radius of the development site

The most recent school roll data in the public domain (2021/22 academic year) can be seen below in Table 4:

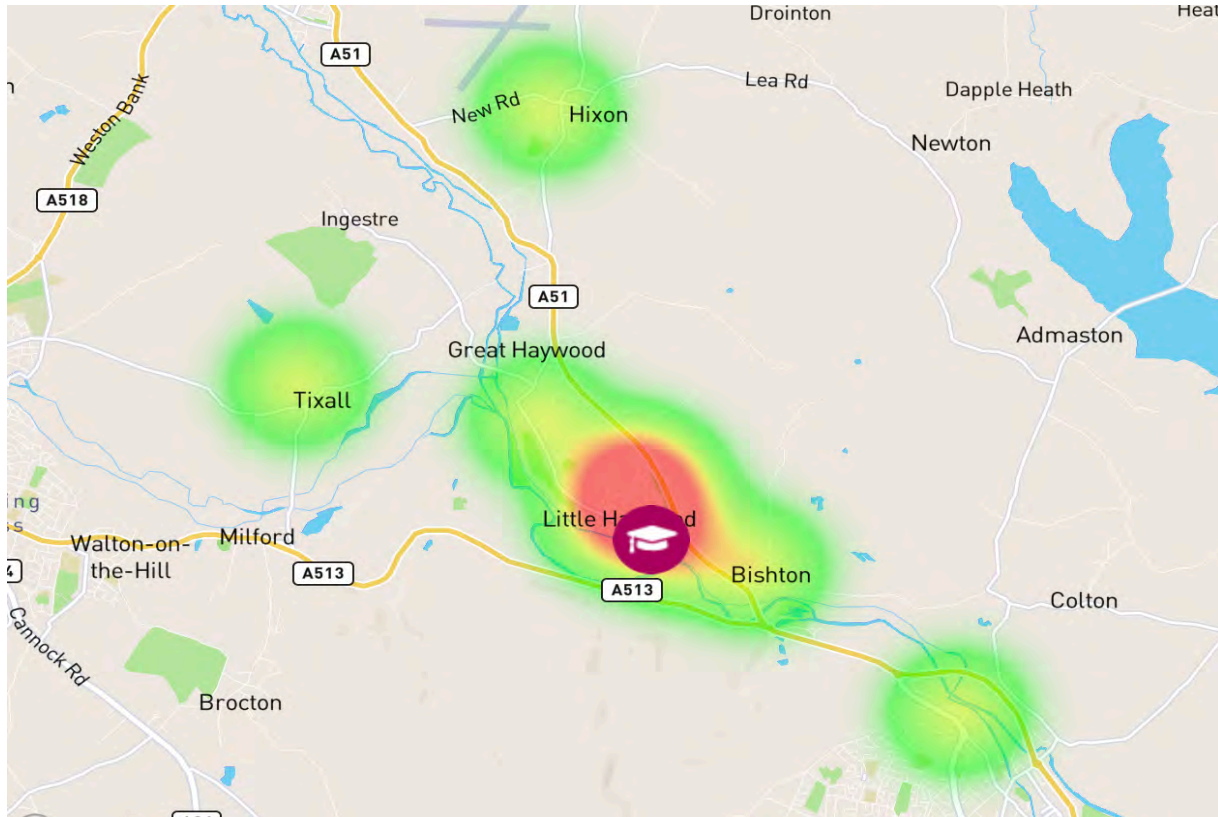
Primary School Name	Postcode	LA Name	Distance (miles)	Capacity	PAN	NoR	Yr R	Yr 1	Yr 2	Yr 3	Yr 4	Yr 5	Yr 6
Colwich Primary School	ST17 0XD	Staffordshire	0.8	185	26	129	17	24	17	18	16	15	22
Anson C of E Primary School	ST18 0SU	Staffordshire	1.2	105	15	105	15	15	16	15	15	13	16
St John's RC Primary School	ST18 0SL	Staffordshire	1.4	105	15	53	4	7	7	13	6	5	11
TOTAL				395	56	287	36	46	40	46	37	33	49
Surplus							20	10	16	10	19	23	7
Available Surplus %							36%	18%	29%	18%	34%	41%	13%

Table 4: School Roll Data (January 2022)

PAN = Planned Admission Number; NoR = Number on Roll

The closest school to the development site is Colwich C of E Primary School. This is a 0.88FE Primary School approximately 0.8 miles south of the development site. The school, as of the previous academic year, was operating at 70% of its capacity with 56 spare places. The COL10 development generates 16 pupils (which there is capacity for) whereas the COL13 development is forecast to generate 71 primary school aged pupils, so there is definitely

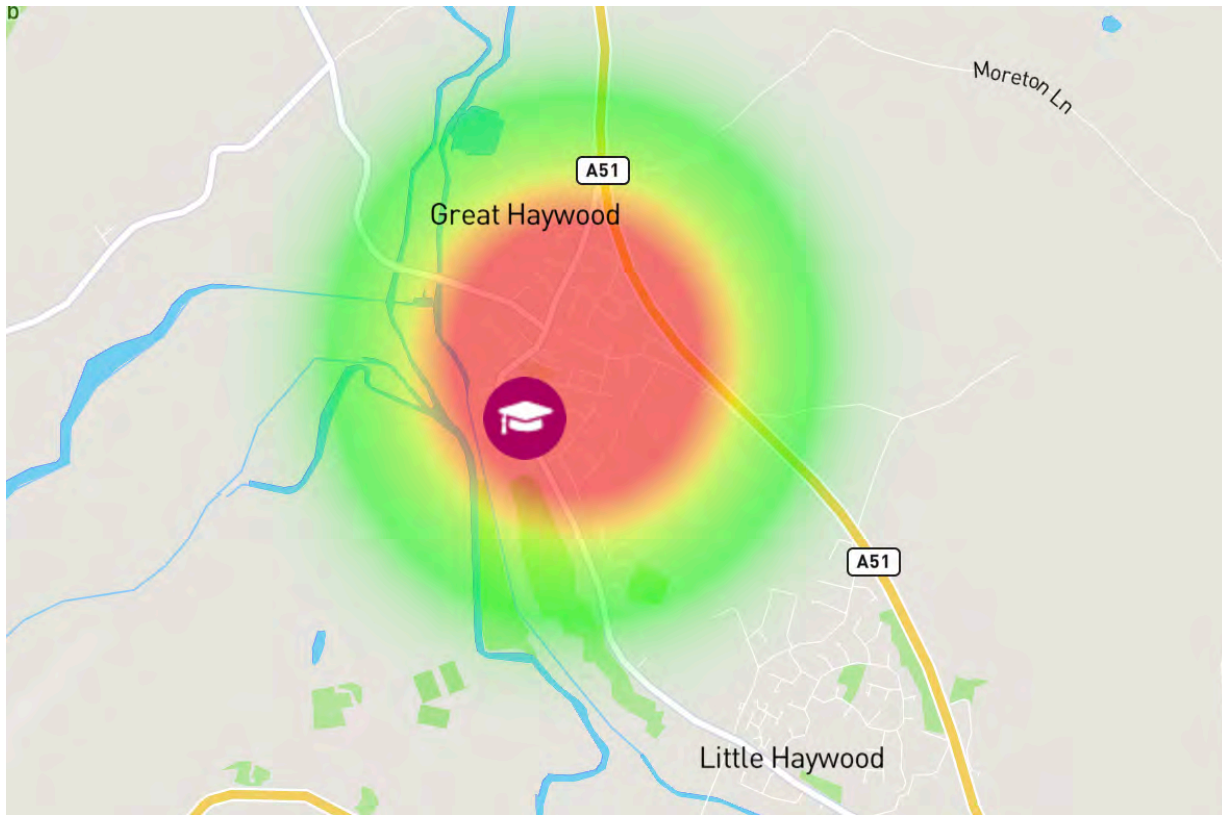
sufficient surplus capacity for some of the pupils expected to be living on the latter site, but not all (it should be noted that there is a development off Little Tixhall Lane for 40 dwellings that is expected to generate in the region of 8 primary school pupils i.e. some but not all of the spare capacity).



Map 5: Colwich CE Primary School Catchment Area Heat Map

The second closest school to the development site is Anson C of E Primary School. This is a 0.5FE Primary School approximately 1.2 miles walking distance to the north of the development site. The school, as of the previous academic year, was full.

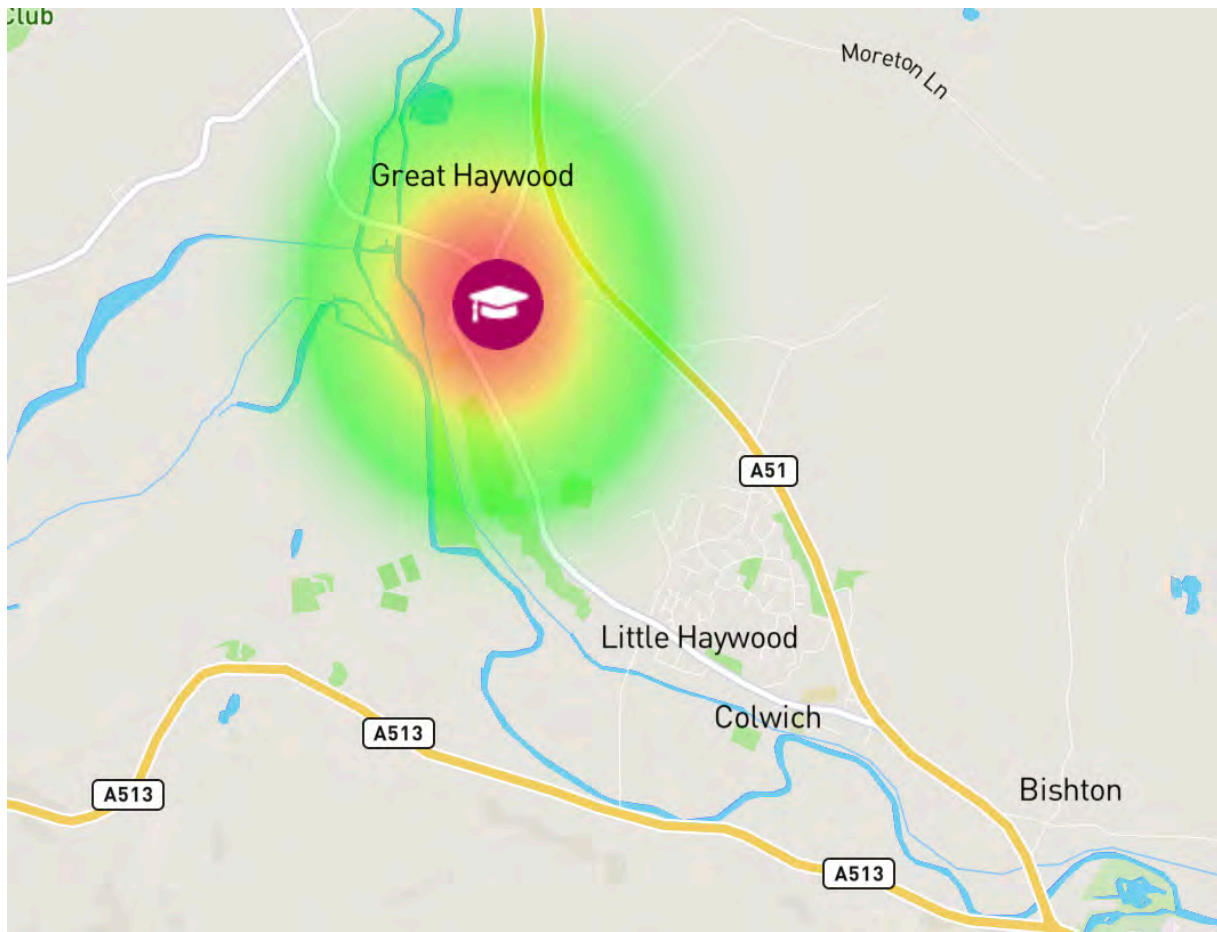
Anson C of E Primary School accommodates pupils from the Great Haywood area, as shown in the Map below:



Map 6: Anson C of E Primary School Catchment Area Heat Map

The final school within an acceptable walking distance of the development site is a Catholic School, with an admissions criterion that favours those Baptised Catholic. On that basis, it may not be appropriate capacity for this development, although could accommodate some of the pupils from the site due to the large number of surplus places it currently has (the school had 52 spare places and was operating at around 50% of its available capacity). The school serves exclusively from Great Haywood, as shown in the Map below.

It should also be stated that if the Catholic School is included in the school roll data for the area, then there would currently be sufficient existing capacity to accommodate growth of circa 500 dwellings (utilising SCC’s child yield multipliers), which more than addresses Bellway’s proposed 425 dwellings:

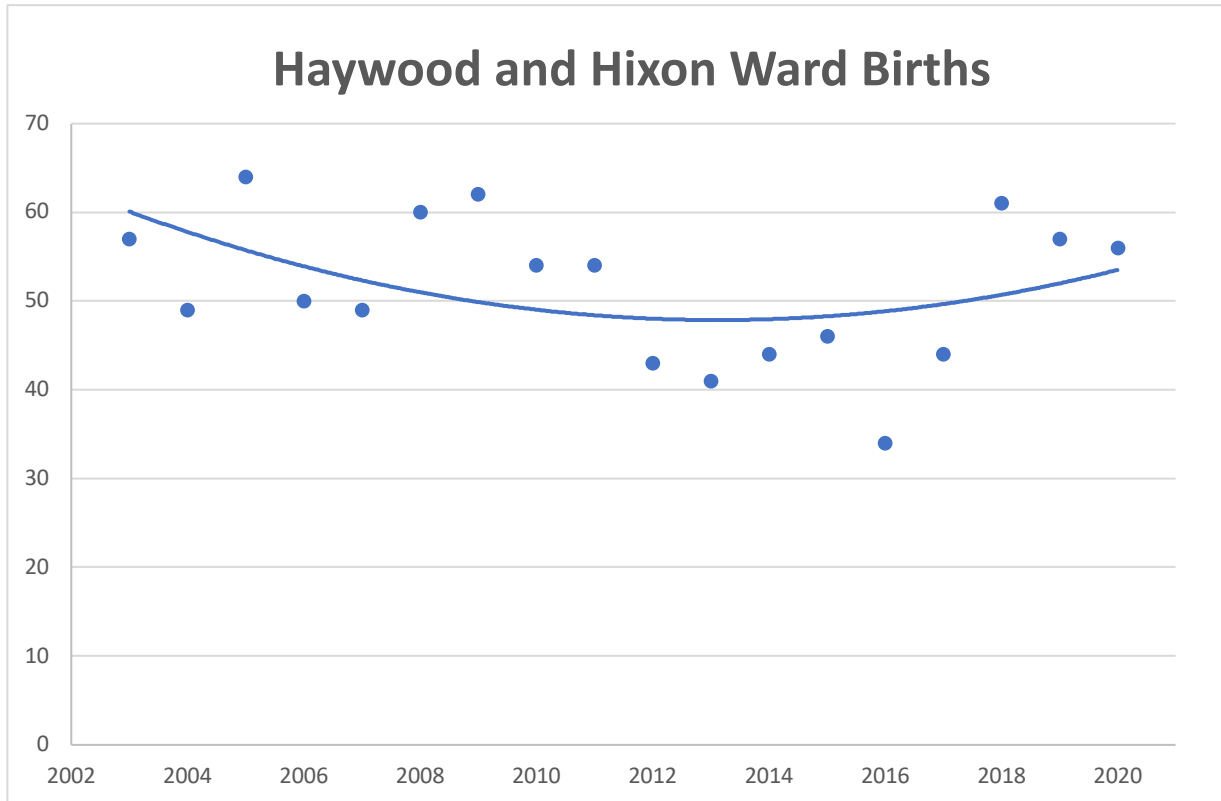


Map 7: St John's RC Primary Catchment Area Heat Map

When looking at COL10 in isolation, there is spare capacity, especially in Reception Year, far exceeding the child yield of this development. There is no Primary School related reason for this development not to come forward. On the contrary, planning obligations would not be justifiable as it stands.

It should be noted that both sites (COL10 and COL13) were rejected from being a Local Plan allocation on the basis that “education capacity constraints are unlikely to be able to be resolved”. For a development of 340 dwellings (COL13), this is likely to be the case, as the child yield exceeds the spare capacity (the threshold is expected to be in the region of 200-250 dwellings). In order to overcome this, should COL13 (or any dwellings above the 200-250 dwelling threshold) be delivered then land for a primary school could be provided as part of the development proposals to allow relocation and enlargement of existing provision. This will be discussed further below.

When looking at birth numbers in the Ward, they have been falling from the recent peak in 2018, and are lower than they have been since their peak in 2005, as shown below:



Graph 1: Ward Births

Turning now to the projections produced by SCC: Anson and Colwich Primary Schools are grouped with three additional schools to form the Stafford Rural 2 Primary Planning Area. The schools have a combined capacity of 752 pupil places:

LA Name	School Name	School Places	Pupil on Roll	Primary Capacity	Secondary Capacity
Staffordshire	Colwich CofE Primary School	185	165	185	0
Staffordshire	St Andrew's CofE Primary School	196	156	196	0
Staffordshire	St Peter's CofE Primary School	161	141	161	0
Staffordshire	St John's Catholic Primary School	105	58	105	0
Staffordshire	Anson CofE Primary School	105	102	105	0

Table 5: Stafford Rural 2 Primary Planning Area Schools

In the 2020/21 academic year, the schools had a combined roll of 616, which equated to 136 spare places. The roll is not expected to change by the 2025/26 academic year, as shown in the Table below:

LA
LA Name Staffordshire
Primary Change -2

Area Code 8606002
Area Name Stafford Rural 2 Primary

Year Group	Primary total
Actual 2021	616
Forecast 21-22	604
Forecast 22-23	623
Forecast 23-24	623
Forecast 24-25	628
Forecast 25-26	614

Table 6: SCC SCAP 2021 Forecasts

To summarise: there is spare capacity, especially in Reception Year, far exceeding the child yield of the COL10 development. There is no Primary School related reason for this development not to come forward. On the contrary, planning obligations would not be justifiable as it stands.

There is insufficient surplus capacity now and forecast in the future at the current non-Catholic schools to accommodate the child yield of the COL13 development site. If this site was to come forward at the quantum discussed, then it would be advisable to reserve a school site on the development to allow one of the existing schools to relocate and expand on to this site. The existing schools, excluding the Catholic School, may be able to accommodate growth in the Great and Little Haywood area of circa 200 dwellings, but 340 is likely to be considered to be too much growth for the existing schools to be able to accommodate. However, if the Catholic School wanted support in terms of new pupils, then the combined capacity of the schools could accommodate growth of circa 500 dwellings without the need for expansion. On that basis, the new school would not be required. It is only if the Catholic School is discounted that new school provision is necessary, which would be triggered around the 250 dwelling quantum.

Any school land reserved should be of a regular shape (roughly rectangular), ideally broadly level and free draining. Primary Schools are often ideally centrally located to where they will serve (the same is generally not true of Secondary Schools). Ultimately, the site will safeguard provision until it can be established whether it is needed, which due to the quantum of dwellings being suggested is not certain.

It should be noted that Bellway is happy to include a school on site for the larger development. On that basis, if more than 200-250 dwellings are delivered, then a Primary/Nursery School will be able to be accommodated as part of the proposals.

Secondary Education

There are no state funded, independent, non-selective schools accommodating secondary school aged pupils within a three-mile radius of this development site. However, there is one school that serves Great and Little Haywood that is just beyond this parameter – Weston Road Academy. This school is within the SCC administrative area, within the Stafford Secondary Planning Area. There is also The Hart School in Rugeley, but this school does not serve Great and Little Haywood, as it is a Rugeley School.

The location of the schools in relation to the development site can be seen below in Map 8:



Map 8: Secondary School in relation to the development site

The latest school roll data in the public domain can be seen in the Table below:

Secondary School Name	Postcode	LA Name	Distance (miles)	Capacity	PAN	NoR 7-11	Yr 7	Yr 8	Yr 9	Yr 10	Yr 11	Post 16
The Hart School	WS15 2UE	Staffordshire	4	1,238	220	1,116	248	243	222	213	190	124
Weston Road Academy	ST18 0YG	Staffordshire	4.9	1,017	182	904	189	193	169	180	173	87
TOTAL				2,255	402	2,020	437	436	391	393	363	211
Surplus							-35	-34	11	9	39	
Available Surplus %							-9%	-8%	3%	2%	10%	

Table 7: School Roll Data (January 2022)

PAN = Planned Admission Number; NoR = Number on Roll

Weston Road Academy is a 6FE Secondary School approximately 4.9 miles walking distance from the development site. Due to the distance, SCC provides school transport:

Weston Road Academy - Service 11S, Colwich, Little Haywood, Great Haywood, Hixon, Select Bus

The wearing of a face covering is highly recommended on this local service bus.

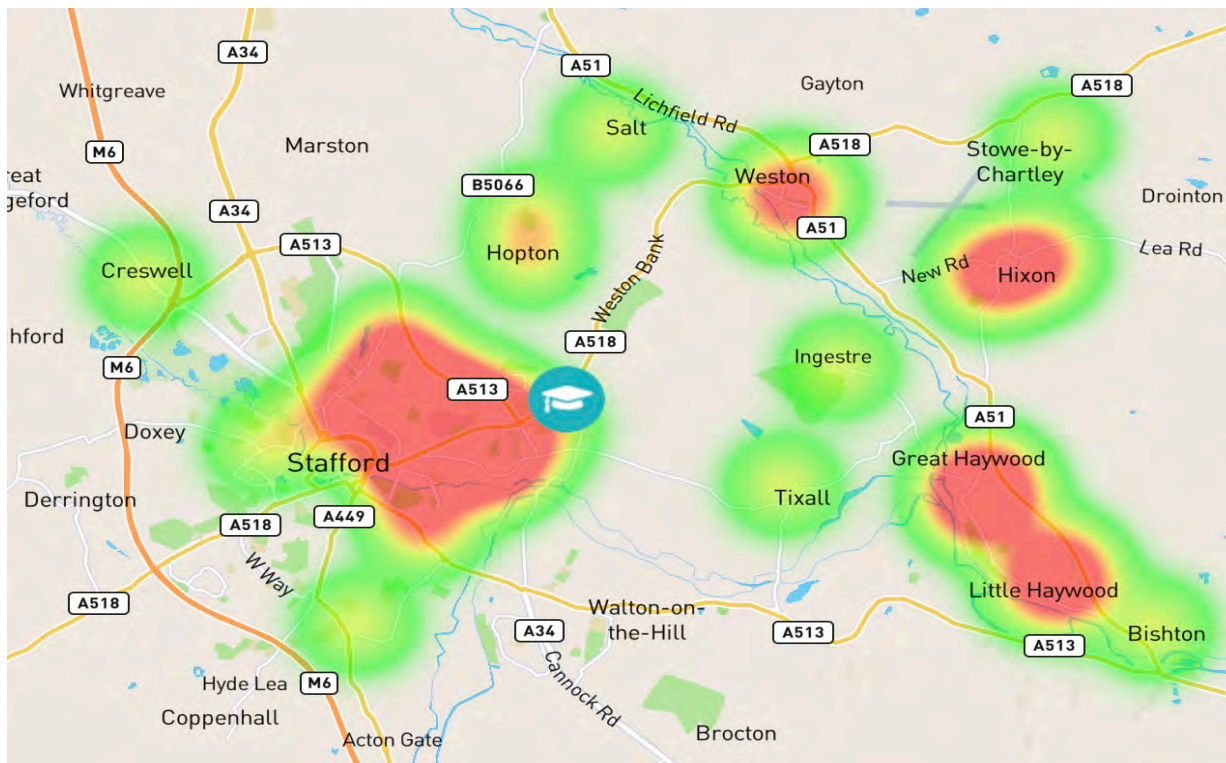
Timetable from 5 September 2022

Schoolbound - Colwich Church, Main Road, Little Haywood, Great Haywood, A51, Church Lane, Martin's Way, Hixon, New Road, A51, Weston, Green Road, Old Road, A518, Blackheath Lane, Weston Road Academy Bus Park.

Homebound - Weston Road Academy Bus Park, Blackheath Lane, A518, Old Road, Green Road, A51, New Road, Hixon, Martin's Way, Church Lane, A51, Great Haywood, Main Road, Little Haywood, Colwich, Main Road.

Weston Road Academy, as of the previous academic year, was full in Years 7 and 8, with minor capacity in higher Year Groups.

The school draws pupils from Hixon, Great and Little Haywood to the east of the school, and from the east of Stafford, as shown in the Map below:



Map 9: Weston Road Academy Catchment Area Heat Map

Weston Road Academy is grouped with five additional schools to form the Stafford Secondary Planning Area. The schools have a combined capacity of 5,931 pupil places:

LA Name	School Name	School Places	Pupil on Roll	Primary Capacity	Secondary Capacity
Staffordshire	Walton High School	1326	1332	0	1326
Staffordshire	Sir Graham Balfour High School	925	957	0	925
Staffordshire	King Edward VI High School	984	628	0	984
Staffordshire	The Weston Road Academy	1017	1002	0	1017
Staffordshire	Blessed William Howard Catholic School	1065	883	0	1065
Staffordshire	Stafford Manor High School	614	399	0	614

Table 8: Stafford Secondary Planning Area Schools

In the 2020/21 academic year, the schools had a combined roll of 5,211 pupils, which was 720 spare places. However, SCC forecast growth in Stafford of 714 additional pupils by 2027/28, meaning that the schools will be full. This is based on pupils that they already know of that are in the system, and does not account for new pupils from housing developments in Stafford, such as this one:

LA

Area Code 8606010

LA Name Staffordshire

Area Name Stafford Secondary

Secondary Change 714

Year Group	Secondary total
Actual 2021	5211
Forecast 21-22	5360
Forecast 22-23	5516
Forecast 23-24	5603
Forecast 24-25	5736
Forecast 25-26	5817
Forecast 26-27	5871
Forecast 27-28	5925

Table 9: SCC SCAP 2021 Forecasts

SCC are well aware of the need for new secondary school provision. They state on their website⁴:

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.

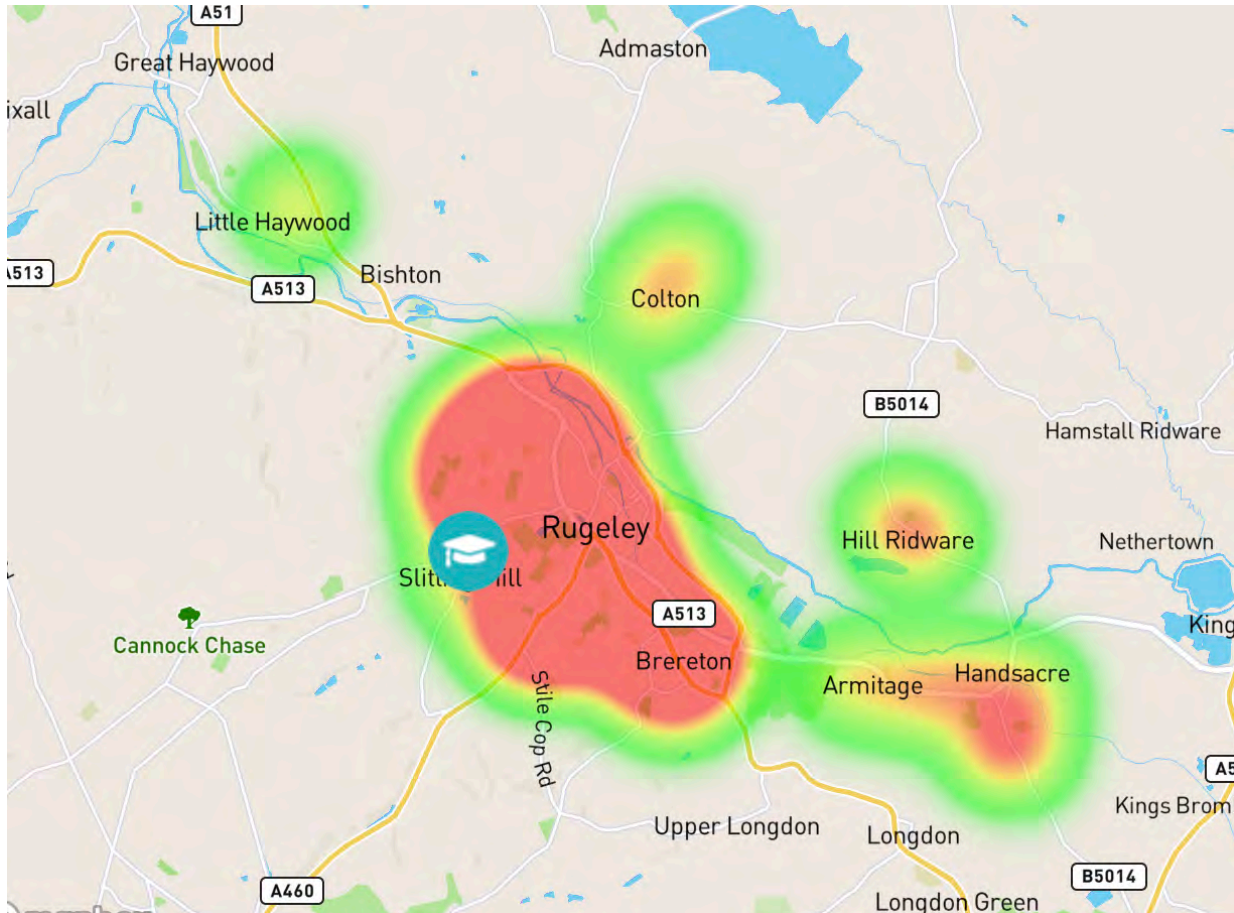
It is understood that SCC plan to build a 5FE (750 pupils in years 7-11) secondary school. It is also understood that SCC do not currently have a site secured to deliver this provision. Expansions are planned prior to the delivery of new provision.

On the basis of the rising rolls and the fact that the nearest school to the development is predominantly full, it is not unreasonable for SCC to request planning obligations towards additional secondary school provision commensurate to the child yield of the development. This is in line with SCC's plan to expand the Stafford Secondary area, and would aid in the viability of these projects.

It should also be noted that part of the reason that these sites were not allocated in the Local Plan was related to Secondary School provision, because it was erroneously stated that The Hart School was the catchment school, which it isn't. Compare the Heat Map shown in Map 9 – which shows a significant number of pupils attending Weston Road Academy from Great

⁴ <https://www.staffordshire.gov.uk/Education/Schoolsandcolleges/PlanningSchoolPlaces/Stafford.aspx#Stafford>

and Little Haywood – to the Heat Map below, which shows a very minor number of pupils from Little Haywood only attending The Hart School:



Map 10: The Hart School Catchment Area Heat Map

School Transport is provided from Great and Little Haywood to Weston Road Academy, and not The Hart School. What is clear is that Secondary School growth in Stafford will accommodate pupils from this development site. On that basis, there is no Secondary School related reason to prevent this development from commencing, providing that planning obligations are provided commensurate to the child yield.

Two final points to note: first is that a Secondary School in Rugeley – Hagley Park Academy (900 pupil capacity) – was closed in 2016 due to a lack of demand for places. Secondly, there is the potential for new Secondary School capacity at the Rugeley Power Station development, so contributions could potentially be directed towards this project if required, and if the timing lines-up.

Early Years

Under the Childcare Act 2006, local authorities have specific duties to secure:

- Sufficient and suitable childcare places to enable parents to work, or to undertake education or training which could lead to employment;
- Sufficient and suitable early years places to meet predicted demand; and
- Free Early Years provision for all 3 and 4-year olds (and more recently the 40% most vulnerable 2-year olds) of 15 hours per week 38 weeks per year.

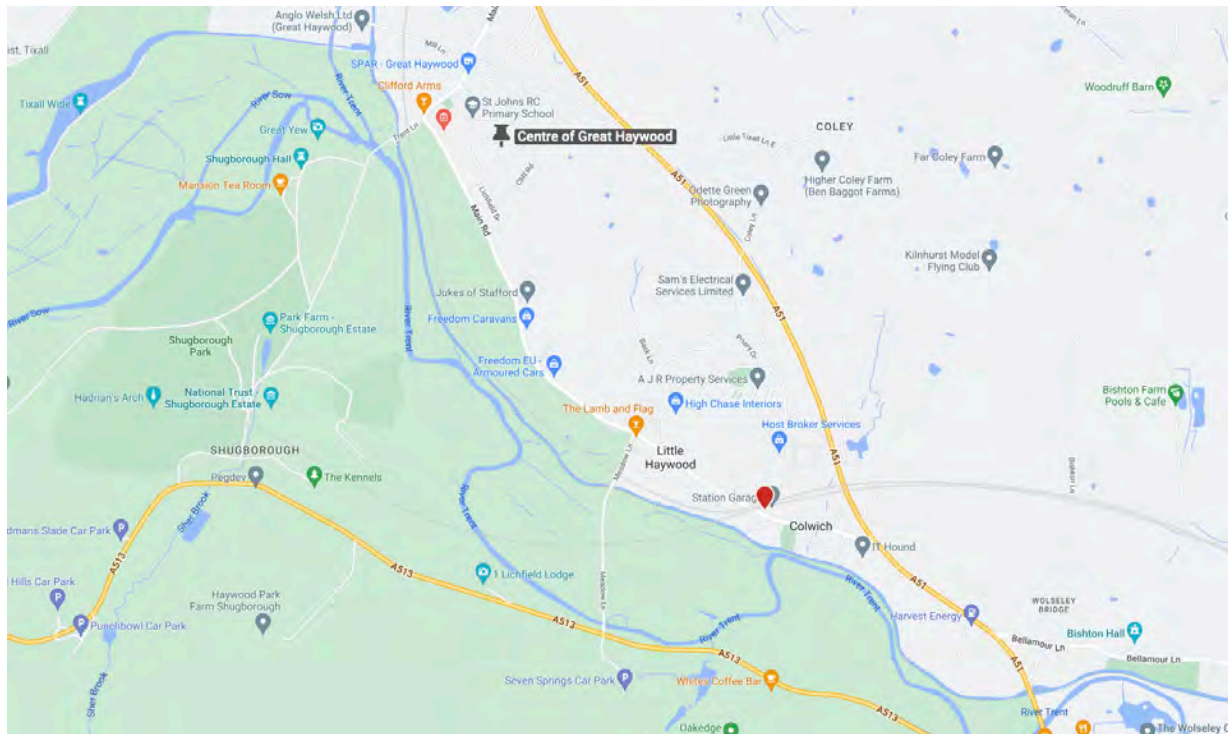
The Childcare Act 2016 includes an extension to the current entitlement and, from September 2017, provides an additional 15 hours (per week 38 weeks per year) of free childcare for 3 and 4-year old children from working families who meet the following criteria:

- Both parents are working (or the sole parent is working in a lone parent family); and
- Each parent earns, on average, a weekly minimum equivalent to 16 hours at national minimum wage and less than £100,000 per year.

There is one private nursery in Great Haywood: Colwich Playgroup, which accommodates 24 children:

<p>Colwich Playgroup 📍 1.0 mile away c/o Colwich Community Hall, Main Road, Colwich, Stafford ST17 0XD</p> <p>i Type of Nursery Nursery School 24 Places</p>	<p>♡ Save View Full Details</p>
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Table 10: Private Nursery in Great Haywood



Map 11: Location of Private Nursery in Great Haywood

This development could reserve space for a new private Nursery to operate. The child yield of a development of this size would be expected to be circa 31 Early Years aged children. A 31 place Early Years facility would be expected to be accommodated on land of circa 350 sqm, as shown in the Table below (although SCC may require a larger Nursery to accommodate further development/child yield):

Internal			
Facilities	No. Children	31	
Min Area sqm			
Secure Entrance		12	Accessible to wheelchair users & buggies
Storage		6	
Office		8	
Main Area		77.5	Based on 2.5m ² per child to cover all ages
Gp Quiet Room		9.7	
Kitchen		6.2	
Toilet Std		4.03	1 per 10
Toilet Accessible		4	Double as staff provision
Washbasins		5.04	1 per 10
Plant		4	
Nappy Changing Area		4	
Sub Total		140.46	
Circulation		28.09	20% net
Total		168.55	
External			
Minimum Space Required			
Play Space		77.5	2.5m ² per child
Buggy Store		10	
Staff Parking		75	12m ² /space
Outdoor Storage		7	
Externals Total		169.5	
Site Total		339	

Table 11: Early Years Standalone Calculator

Alternatively, if new school provision was provided on this site, any new school would include an element of Early Years provision (usually 26 children per 1FE).

SEN

The DfE states in their latest PPG on securing education planning obligations (November 2019):

We advise you to seek developer contributions for expansions required to sixth form and special educational needs and disabilities (SEN) provision, commensurate with the need arising from the development.

This demonstrates that the best practice guidance supports the requesting of SEN contributions if they are needed.

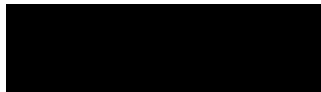
Government statistics suggest that in 2022 4% of children in the UK have an EHC plan/Statement of SEN (up from 3.7% in 2021)⁵. 12.6% of the UK's school age child population has some form of SEN but no EHC plan. Nationally, there is not sufficient SEN provision to accommodate the demand, which is growing.

Contributions towards additional SEN places are likely to be sought and likely to be justified.

Summary

There are options, from a Primary, Secondary, and Early Years Education perspective, to allow either development to come forward. There are no Education-related reasons why either development cannot progress.

Kind regards,



Ben Hunter

Associate Director – Education and Social Infrastructure

EFM

⁵ <https://explore-education-statistics.service.gov.uk/find-statistics/special-educational-needs-in-england>

Land at Little Haywood, Staffordshire

Review of Stafford Borough Council's Local Plan Landscape and Visual Evidence Base

edp5977_r004b

1. Introduction

- 1.1 This Note has been prepared by The Environmental Dimension Partnership Ltd (EDP) on behalf of Bellway Homes Limited to review and then respond to the findings of Staffordshire Borough Council's Local Plan evidence base on landscape and visual matters in respect of Land at Little Haywood, Staffordshire (hereafter known as the 'site').
- 1.2 More specifically, the Note reviews and considers the findings of the Council's evidence base in relation to landscape and visual matters for sites COL 10 and COL 13, which it does not currently intend to take forward as draft residential allocations.
- 1.3 The two sites in question lie to the north-west of the village of Little Haywood (and Colwich) and to the south of the village of Great Haywood. Little Haywood lies to the north of the West Coast Mainline railway, whilst Colwich is nestled between the West Coast Mainline railway and the Trent and Mersey Canal, with the River Trent immediately adjacent.

2. Background

- 2.1 A Landscape and Visual Technical Note was prepared by EDP for Land at Little Haywood, Staffordshire in April 2020. This examined the landscape and visual baseline conditions within the site and evaluated the site in its broader context with reference to sensitive visual receptors and landscape receptors.
- 2.2 The EDP Technical Note, which was submitted in support of the site's promotion for allocation through the Local Plan process, summarised the key opportunities and constraints of the site and made recommendations regarding mitigation measures and its development potential. This included recommendations that, with regards to the AONB, any potential development should (inter alia):
 - Recognise the setting of the Cannock Chase AONB to the west and its 'Special Qualities';
 - Conserve and enhance those environmental assets that contribute towards the districts distinctiveness, in particular the Cannock Chase AONB, Shugborough Registered Park and Garden, Conservation Areas, settlement pattern and landscape (Policy N4 and Policy N8);



- Demonstrate it has been positively influenced (design, scale and nature) by the landscape and that it has enhanced and respected the setting of the settlement (Policy N1, NP Policy CC5 and NP Policy CE1); and
- Incorporate a landscape strategy to ensure it integrates appropriately into its surroundings and demonstrate that it does not reduce the visual separation of settlements along the Trent Valley (NP Policy CC2 and NP Policy CE2).

- 2.3 In September 2020 FPCR was commissioned by Stafford Borough Council (SBC) to carry out a Landscape Sensitivity Assessment (LSA) to inform and support the preparation of its new Local Plan 2020-2040 (see extracts in **Appendix EDP 1** to this Paper). The LSA takes into account the 'Cannock Chase AONB Views and Setting Guide' (extracts provided at **Appendix EDP 2**), which was published in July 2020. Both the LSA and the Areas of Outstanding Natural Beauty (AONB) guide were produced prior to the publication of EDP's report.
- 2.4 According to FPCR, the landscape character information which is used within the LSA is based upon the Staffordshire Landscape Character Assessment Review (2015). However, although FPCR state that *"This landscape character information used within this Sensitivity Study is based on the Staffordshire Landscape Character Assessment Review, 2015 with updates as necessary to ensure the information is relevant at a borough level and based upon field observation"*, the document is not available on the Council's website. It is noted that the South Staffordshire Landscape Sensitivity Assessment, published in 2019, stated that (with EDP emphasis) *"The principal source of written information for carrying out the sensitivity assessment in South Staffordshire is the Planning for Landscape Change SPG (a landscape character assessment produced for Staffordshire and Stoke on Trent Structure Plan 2010-26 in 2000), which was subsequently revoked but is still a material consideration. This was updated in 2015 as the Draft Staffordshire Landscape Character Assessment Review but not adopted and is not publicly available".* As such, the basis of FPCR's conclusions is unclear and, seemingly, based on information that is not adopted and is not available.
- 2.5 In order to robustly test the findings of the AONB guide, and also the conclusions of the LSA, EDP undertook a recent site visit in November 2022, with photography taken from selected viewpoints. The locations of the proposed representative photoviewpoints are illustrated on **Plan EDP 1**, while the photography is contained at **Appendix EDP 3**.
- 2.6 EDP has selected a number of viewpoints that are considered to be representative of the nature of the views available from a range of the receptor groups including users of the local public rights of way (PRoW) network including the 'Staffordshire Way' promoted route, users of Shugborough Registered Park and Garden (RPG) and users of the Cannock Chase AONB. A general summary of Photoviewpoint locations is provided below.
- 2.7 **Photoviewpoints EDP 1** and **2** illustrate the views available to PRoW users on the rising land to the north, from where there are broad views across the landscape. The site forms the foreground, comprising open agricultural fields contained by boundary vegetation and

overlooked by residential development on the settlement edge of Little Haywood. The built form is flanked by woodland within Shugborough RPG and the AONB beyond which rises to form the distant horizon.

- 2.8 In addition, **Photoviewpoints EDP 3, 4, 5 and 6** represent views experienced by PRow users within the site, and within its context, looking towards Shugborough RP&G and the AONB. **Photoviewpoints EDP 7, 8, 9 and 10** are representative of views experienced by receptors within the AONB looking towards the site.

3. Stafford Borough Council Landscape Sensitivity Assessment

- 3.1 As set out above (see Paragraph 1.2) and in the LSA (**Appendix EDP 1**), the site is split into two landscape assessment sites; COL10 and COL13.
- 3.2 Parcel COL13 is a wider area of land, covering 31.05 hectares (ha) and includes the far smaller COL10 covering 3.7ha within its footprint area (refer to **Image EDP 3.1** below).

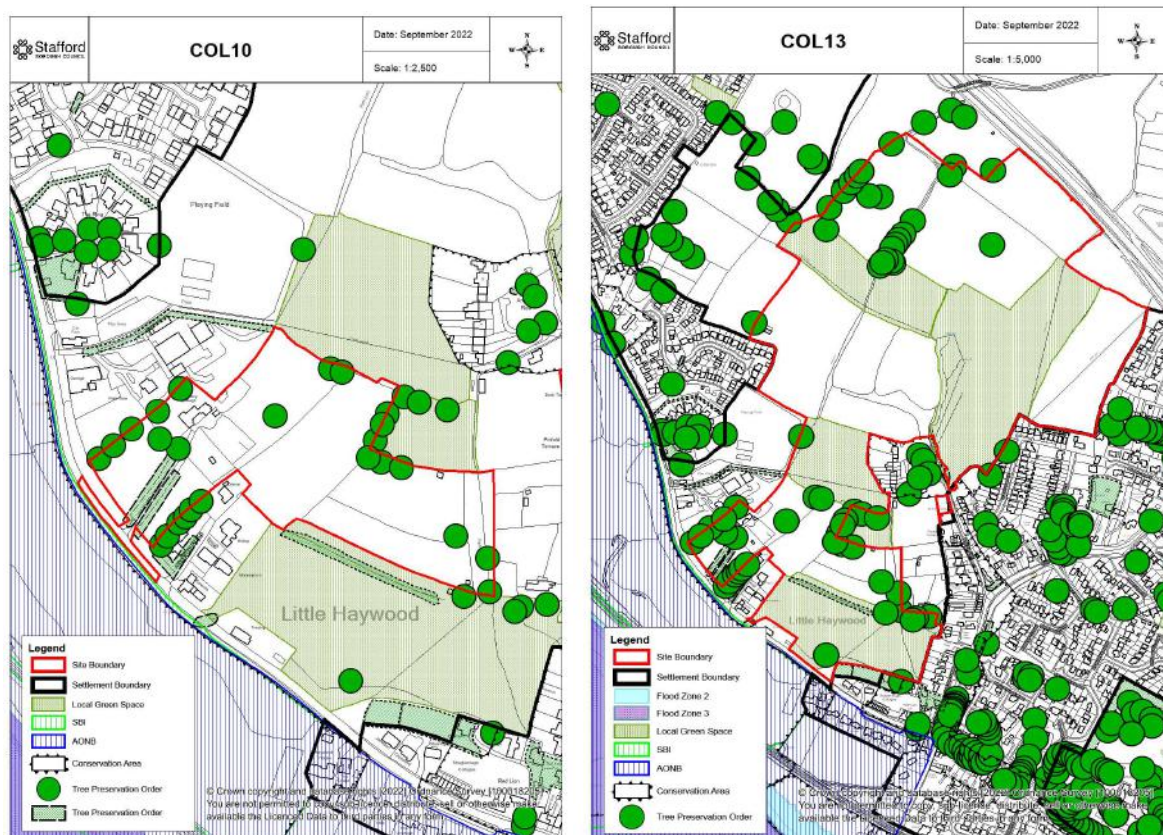


Image EDP 3.1: Maps illustrate the Parcel areas COL10 and COL13 extracted from the Site Assessments Profiles.



- 3.3 The LSA states that the judgements which are made on the landscape sensitivity of a particular site are based on a combination of factors and the final sensitivity rating, being based on a brief methodology, is a 'professional judgement'.
- 3.4 Landscape sensitivity criteria are listed in Appendix A of the LSA, which are then combined with corresponding comments for high, medium and low susceptibility. The site assessment sheets included at Appendix B comprise a tick box exercise for each landscape criterion which is scored on a five-point scale from high to low sensitivity. The scoring is again based upon professional judgement. The assessment concludes that:
- Parcel COL10 has a **high-medium** overall landscape sensitivity; and
 - Parcel COL13 has a **high** overall landscape sensitivity.
- 3.5 As described above, the methodology is heavily based upon professional judgement, leading to an element of ambiguity in the scoring. The landscape value of the wider Parcel COL13 is assessed as medium, whereas the smaller Parcel COL10 is assessed as medium/high. There is no commentary as to why the value of the smaller site is so elevated.
- 3.6 The two key summaries relating to the two different Parcels COL10 and COL13 are highlighted below (extracts highlighted by EDP for emphasis):
- *Restrict development to the south west where it relates more to the existing settlement pattern and **maintain the gap between Little Haywood and Great Haywood**. Retain existing vegetation as far as possible and the Public Right of Way - COL10; and*
 - ***Restrict development from rising land in the north** and locate development as close as possible to the existing settlement edge to maintain a gap between Little Haywood and Great Haywood. Retain existing vegetation and Public Rights of Way - COL13.*
- 3.7 Importantly, neither of the two key summaries conclude or recommend that development in this location should be avoided.
- 3.8 EDP's analysis of the site to date, has shown that the Site is not located within a landscape designated at the Local level, although is in very close proximity to the Cannock Chase AONB and Shugborough Registered Park and Garden. The Site is broadly typical of the wider LCA, having been identified as forming part of the Settled Farmlands LCT within the Staffordshire Planning for Landscape Change and Character Assessment' (2001, Supplementary Planning Guidance) which was undertaken over 20 years ago. The Draft Staffordshire Landscape Character Assessment Review was not adopted and is not publicly available, and therefore provides no further analysis of the site.
- 3.9 The 'Planning for Landscape Change' document includes an assessment of landscape quality, described as an assessment of the condition of the landscape and how strongly the underlying



landscape character is expressed in that area. This assessment of landscape quality has led to the mapping of landscape policy objective zones, with the site lying with one policy zone, 'landscape maintenance'. This is derived from an assessment of high (but not highest) landscape quality and high visibility. EDP's analysis of the site to date has shown that due to changes in the baseline landscape in the time since the Council's assessment was undertaken in 2001, following a review of the visual constraints identified as specific to the Site, a moderate rather than high sensitivity is appropriate.

4. Cannock Chase AONB Views and Setting Guide (July 2020)

- 4.1 With respect to the AONB, the '*Cannock Chase AONB Views and Setting Guide*' was prepared to identify views to and from the AONB to ensure that new development is effectively integrated into the landscape setting in views from the high ground of the AONB (outwards) and in towards the AONB from outside its boundaries.
- 4.2 The document identifies twenty (20) key views which it states affect the setting of the AONB. The viewpoints in it have been used to demonstrate how the guide may be applied to specific views within the landscape.

Representative Viewpoints

- 4.3 The AONB's '*Representative Viewpoint 2: View looking north from the Triumphal Arch at the Shugborough Estate*' is identified as offering panoramic views across the landscape north-east of the AONB. Whilst the site is predominately screened from this view, glimpsed views of the River Trent and Great Haywood are available in the middle ground and filtered by the extent of intervening vegetation. In response, **Photoviewpoint EDP 8** is specifically orientated towards the site and represents views from the Triumphal Arch (also known as Hadrian's Arch). As can be seen, the site is entirely screened from view by the intervening mature trees which wrap around the National Trust carpark and are associated with the disused railway line. Beyond this, further tree and woodland planting screens the site.
- 4.4 With that in mind, **Photoviewpoint EDP 9** illustrates the view from c.300m west of the Triumphal Arch on an informal footpath where the landform rises. From here, 'Great Haywood Cliffs' can be seen as an area of open grassland on the horizon behind the Triumphal Arch. To the right and on the horizon, a very small area of land within the site's eastern boundary can be identified in this view (approximating to the location of **Photoviewpoint EDP 1**).
- 4.5 Overall, in views from the AONB, the site itself is barely perceptible, if seen at all. The exception being a small part of the northernmost areas of COL13 which could possibly be visible in heavily filtered views during winter months. Parcel COL10 cannot be seen in open views from the AONB.



Setting Zones

- 4.6 A number of Setting Zones have been identified in the AONB Guide, and these are derived largely from the Landscape Character Type boundaries included in the published landscape character assessment for the AONB. Management principles have been applied to these zones to help ensure that the AONB and its setting are managed in a way that conserves and enhances its special qualities.
- 4.7 The site falls in 'Setting Zone A: Needwood Farmlands' (refer to **Appendix EDP 2**) where *"The close relationship between Little Haywood and Great Haywood with the AONB boundary is described as a 'Sensitive Edge' within the AONB Design Guide."*
- 4.8 A key summary that must be addressed by any proposals for the site is: *"The characteristic farmland vales and patchwork landscape of this setting zone provide the rural backdrop in views from the high ground of the eastern flank of the AONB, contributing to its tranquil character. The setting zone plays an important role in maintaining long distance views to the wooded ridge line associated with the Needwood Claylands (Setting Zone B) in views from the AONB."*
- 4.9 Within the 'Views from the AONB', the following recommendations are relevant to any proposed development within the site:
- *Conserve the function of the area as a predominantly rural uncluttered backdrop by **retaining views to the patchwork field pattern in views from the AONB;***
 - *Monitor development proposals with the overall objective of **maintaining the existing small scale settlement pattern at Great Haywood and Little Haywood** in views from the AONB. The strong estate character of the villages due to the associations with the Shugborough Estate should also be conserved. Ensure that proposed developments **do not disrupt views towards the background view**, including views to the wider wooded ridge line of Needwood Claylands;*
 - *The use of **vernacular building styles/materials for new development** within the landscape of the setting zone should therefore be promoted, where appropriate;*
 - *Explore opportunities to **enhance tree cover and reinstate hedgerow boundaries** to soften stark settlement edges around in views from the AONB;*
 - *Landscape schemes associated with development proposals should also consider opportunities for the **mitigation of view interruption as well as the creation of framed vistas** where possible. With the exception of shadow effects in the ZTV output associated with Rugeley Power Station and the settlements of Great Haywood, Little Haywood and Rugeley; and*



- Seek to retain views and **provide a visual link from the AONB to the undeveloped ridge line** occupying the remnants of Needwood Forest (Setting Zone B).

4.10 The AONB Board has set out a number of 'management principles' for land within the setting of the AONB. Importantly, along with the criteria in dealing with views from the AONB, these do not preclude new development, but simply promote the idea that new development in this location should be approached sensitively and so accordingly the management principles should not be employed as 'selection criteria' to discriminate between development options at this early stage of the process.

5. Summary and Recommendations

5.1 This Note reviews and responds to the Council's LSA and the Cannock Chase AONB Views and Settings Guide, insofar as they relate to landscape and visual matters, in assessing the reasons why sites COL 10 and COL 13 (Land at Little Haywood) have not been identified as being suitable for development and taken forward as draft residential allocations within the Local Plan.

5.2 The high landscape sensitivity set out within the LSA, with COL10 being 'high-medium', has largely derived from the site's proximity to the Cannock Chase AONB. The LSA states that "*Elevated land within the site has potential to form the view on the skyline from the AONB to the south as well as from adjacent settlement. Falls within Setting Area A within the Cannock Chase AONB Views and Setting Guide*". However, in views from the AONB, the majority of the site is barely perceptible, if seen at all. Furthermore, the LSA has been found to be based on a brief methodology with the final judgement of sensitivity being based on 'professional judgement'.

5.3 Following EDP's review of the site and its context, as demonstrated by the supporting photography contained at **Appendix EDP 3**, with the exception of a very small part of COL13 which may be seen in heavily filtered views, the site is screened in views from the AONB by mature woodland; this can also be seen in the AONB's own Representative Viewpoint 2. Parcel COL10 cannot be seen in open view from the AONB. EDP's analysis of the site to date has shown that due to changes in the baseline landscape in the time since the Council's assessment was undertaken in 2001, this being the most up-to-date assessment available on the Council's website, a moderate rather than high sensitivity is appropriate. As such, at this early stage, there is absolutely no reason to conclude that the site's proximity to the Cannock Chase AONB should preclude sensitive development in this location.

5.4 EDP's work to date has concluded that the minimisation of visibility to the proposals from the AONB could be achieved through the retention, enhancement of and addition to vegetation at the north-western and north-eastern site boundaries. In addition, the visibility of new built form could be limited by excluding development from the more elevated slopes, as on the adjacent settlement, and/or by limiting the height of development in these areas of the site.

5.5 At this early stage, EDP considers that, with the application of sound masterplanning principles, either of the two different options (COL 10 and COL 13) could come forward and be delivered



for development in accordance with the current planning policy framework. Indeed, there is no landscape reason why residential development should be avoided in this location and these two sites not taken forward as allocations within the emerging Local Plan.

- 5.6 In that regard, the evidence presented in the Council's LSA and the AONB Guide should not be used to reject the allocation of the site.



Appendix EDP 1
Extracts from the Stafford Borough Council Landscape Sensitivity Assessment
(Sept 2020)

Landscape Assessment Site COL10

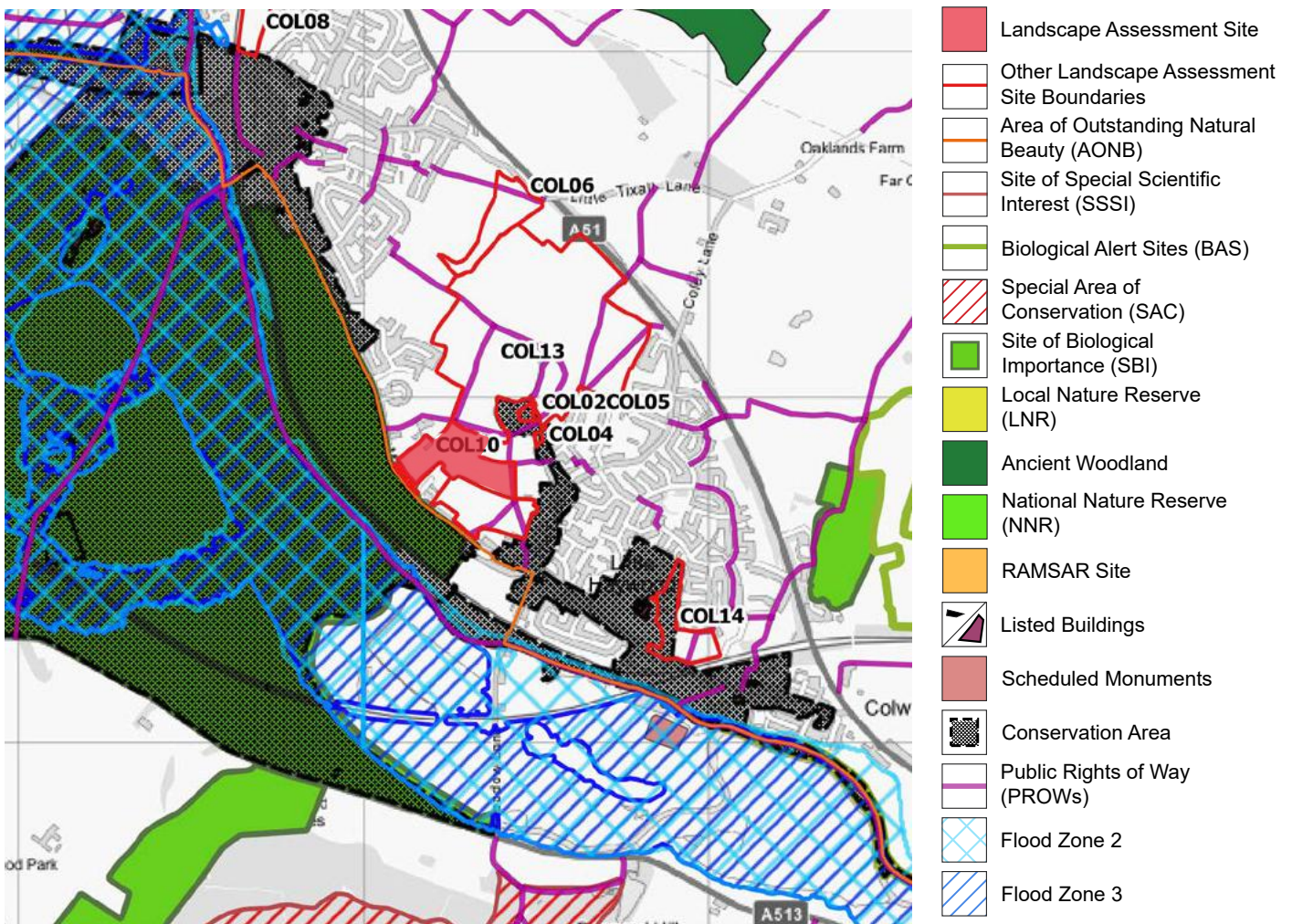
Several fields / land parcels located to the north of Main Road and separated by established trees. Properties off Main Road adjoin to the south east and business / farm buildings lie adjacent to the west. To the north, east and south lie agricultural land with that to the south and north forming part of site COL13. Land within the site also falls within the wider COL13 site. A Public Right of Way runs adjacent to the site's eastern boundary.

Settlement: Little Haywood/Great Haywood

Designations: None

Landscape Character Area: Settled Farmlands

Considered as part of a potential Garden Village or Strategic Development Site: No



Representative Photographs

Criteria	Sensitivity					Notes
	H	H/M	M	M/L	L	
Scale		✓				Medium to small scale fields enclosed by established vegetation.
Landform				✓		Landform rises to the north, north west.
Landcover			✓			Predominately pasture land with well-established vegetation along field boundaries.
Biodiversity		✓				Nearest site is a Site of Biological Importance located to the south beyond Main Road.
Man-made Influences			✓			Development to the east, south and west though vegetation within the site helps limit intervisibility in areas.
Scenic Quality and Character		✓				Established vegetation provide some sense of place and a scenic quality.
Relationship with Existing Settlement Form		✓				Site is located in the gap between Little Haywood and Great Haywood. The south west of the site fits more with the existing settlement pattern.
Skylines and Settings		✓				Elevated site though vegetation helps to limit effects on skylines. Potential for skyline views from AONB to the south. Falls within Setting Area A within the Cannock Chase AONB Views and Setting Guide.
Movement			✓			Adjacent to Main Road and existing settlement edge.
Visibility, Key Views, Vistas		✓				Though vegetation helps to visually enclose the site there is intervisibility with the AONB to the south.
Views to and from Important Landscape and Cultural Heritage Features (both within and outside of each assessment Site / Landscape Character Area)		✓				Registered garden to the south and conservation area to the south and east.
Relationship with Wider Landscape		✓				Views to AONB to the south where boundary vegetation allows.
Landscape Value		✓				

Overall Landscape Sensitivity of the Site:

High/Medium

Mitigation:

Restrict development to the south west where it relates more to the existing settlement pattern and maintain the gap between Little Haywood and Great Haywood. Retain existing vegetation as far as possible and the Public Right of Way.

Landscape Assessment Site COL13

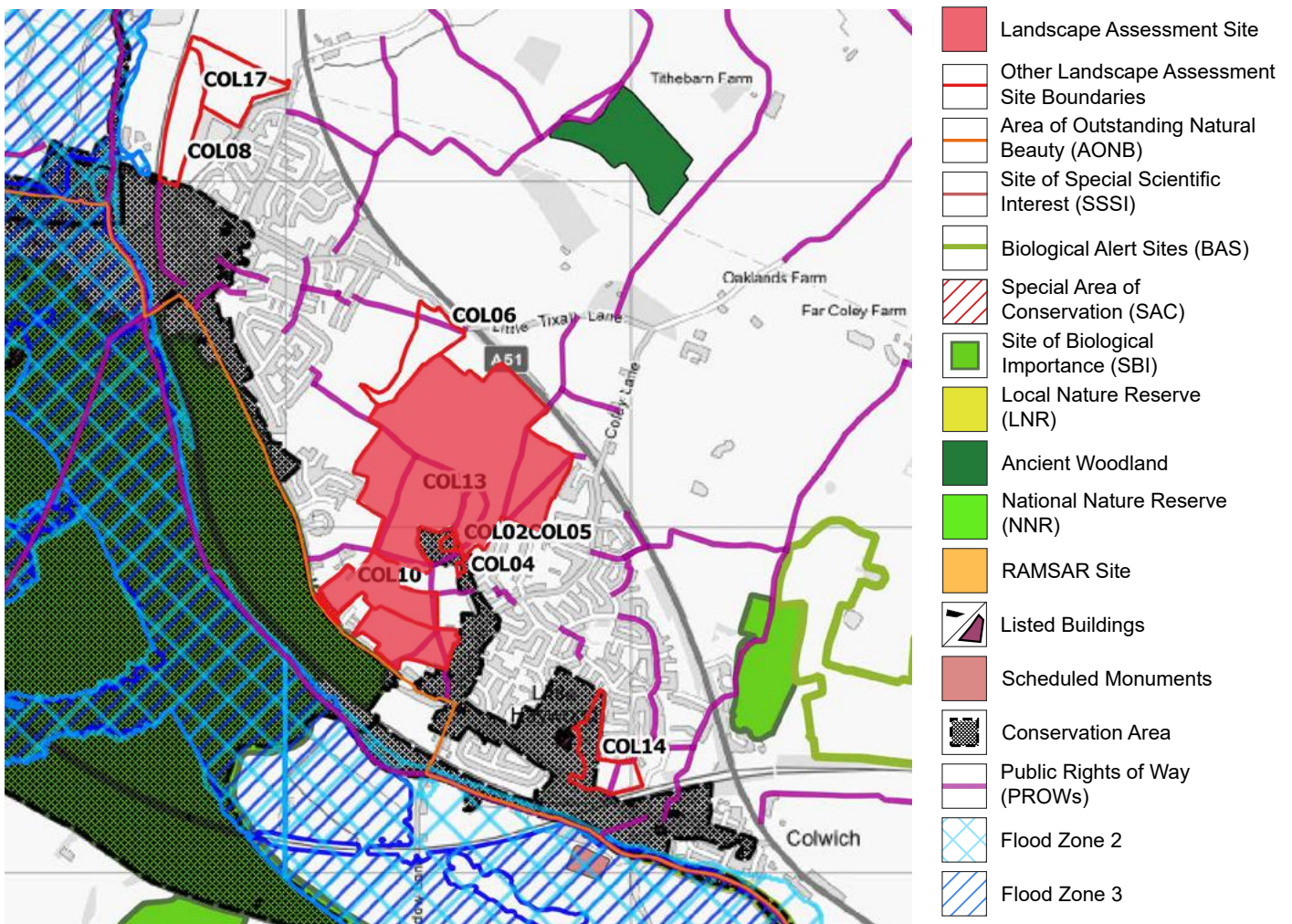
Fields located between Little Haywood and Great Haywood to the north of main road. The settlement edge of Little Haywood adjoins to the east and the A51 runs to the north. To the south is located Main Road. The site incorporates land within site COL10 as well as further land to the south and north. The fields within the site are divided by hedgerows and trees and a number of Public Rights of Way cross the site.

Settlement: Little Haywood

Designations: None

Landscape Character Area: Settled Farmlands

Considered as part of a potential Garden Village or Strategic Development Site: No



Representative Photographs



Criteria	Sensitivity					Notes
	H	H/M	M	M/L	L	
Scale				✓		Medium to large scale landscape.
Landform			✓			Land rises to the north.
Landcover			✓			Agricultural land with established trees and hedgerows to field boundaries.
Biodiversity		✓				Site of Biological Importance located to the south beyond Main Road.
Man-made Influences			✓			Development to the east and south east, south west. Main Road runs adjacent to the south and the A51 to the north.
Scenic Quality and Character		✓				Some scenic qualities such as views to the rising land within the AONB to the south and established trees though also detracting factors.
Relationship with Existing Settlement Form		✓				Though the site adjoins the settlement edge it is also located within the gap which separates Little Haywood and Great Haywood. Important to settlement identity.
Skylines and Settings	✓					Elevated land within the site has potential to form the view on the skyline from the AONB to the south as well as from adjacent settlement. Falls within Setting Area A within the Cannock Chase AONB Views and Setting Guide.
Movement				✓		Movement associated with the A51, settlement edge and Main Road.
Visibility, Key Views, Vistas	✓					Parts of the site are visible from the AONB located beyond Main Road to the south.
Views to and from Important Landscape and Cultural Heritage Features (both within and outside of each assessment Site / Landscape Character Area)		✓				Conservation area located to the east and south. Shugborough registered garden to the south, though its boundary is enclosed by vegetation. Listed buildings to the south east.
Relationship with Wider Landscape		✓				Views of adjacent settlement but also views to rising land within AONB to the south and agricultural land to the west.
Landscape Value			✓			

Overall Landscape Sensitivity of the Site:

High

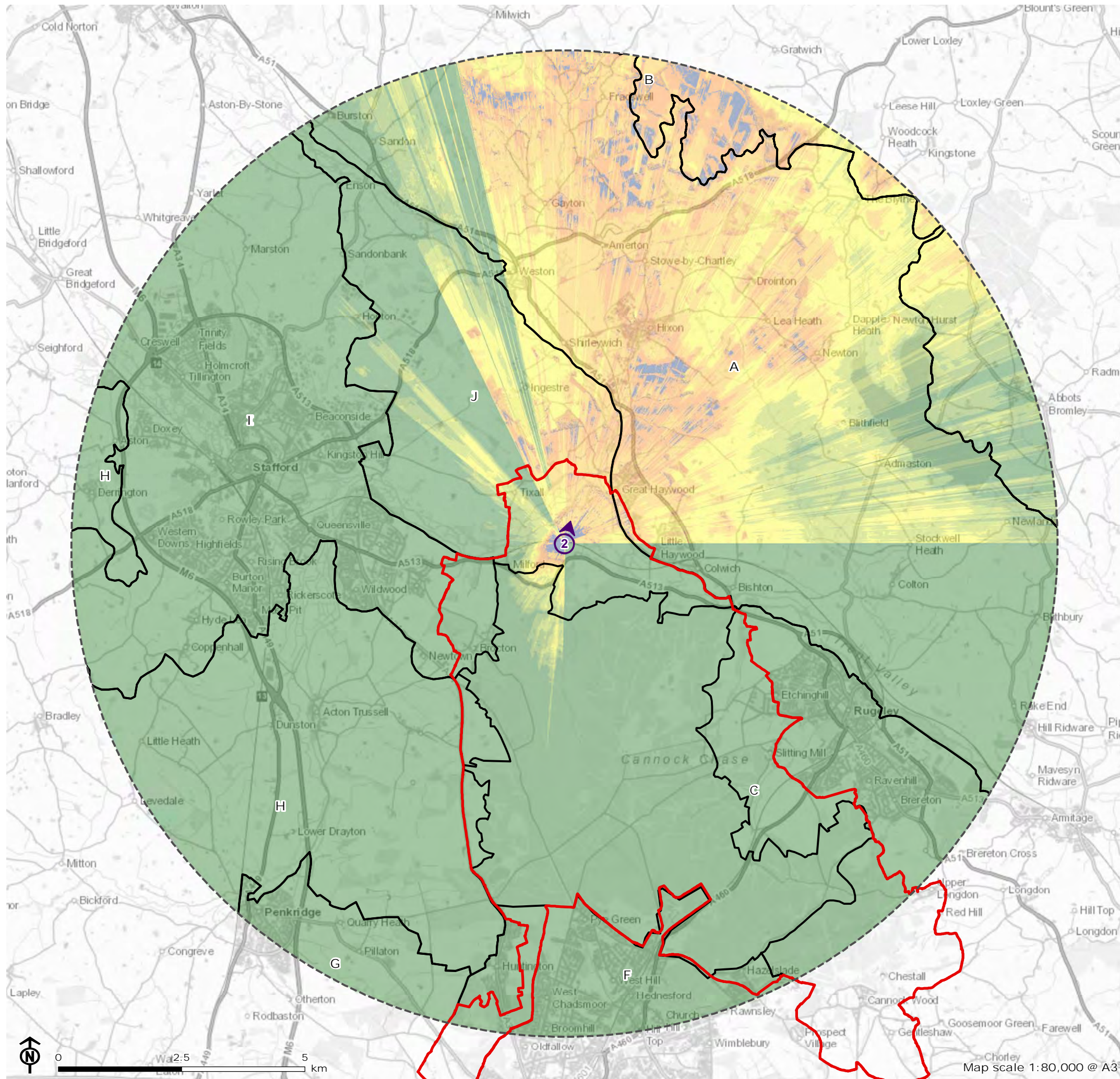
Mitigation:

Restrict development from rising land in the north and locate development as close as possible to the existing settlement edge to maintain a gap between Little Haywood and Great Haywood. Retain existing vegetation and Public Rights of Way.



Appendix EDP 2
Extracts from the Cannock Chase AONB Views and Settings Guide
(July 2020)

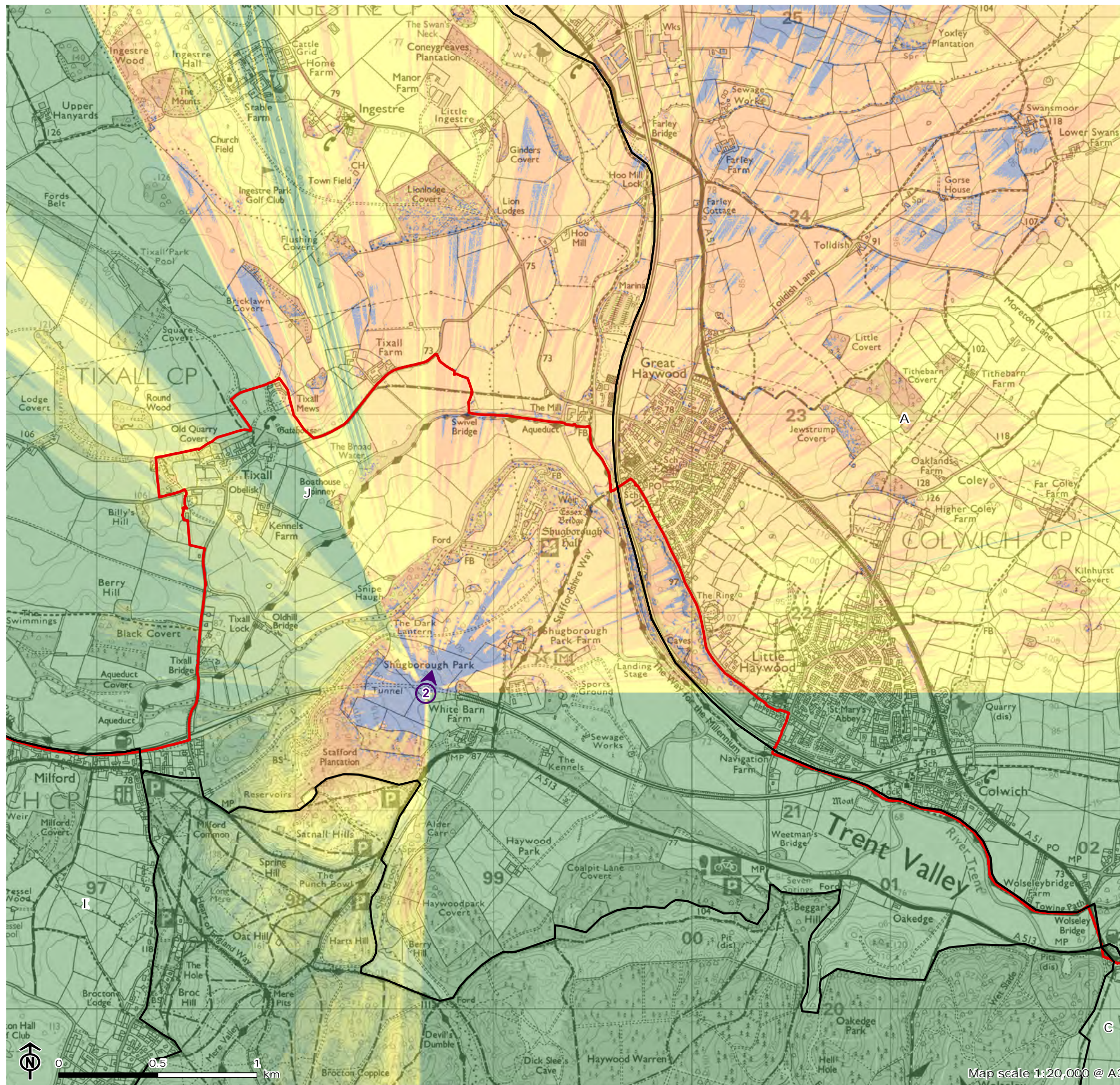
Figure 4.4: Zone of Theoretical Visibility (ZTV) for Viewpoint 2 and Setting Zones



-  Viewpoint
 -  Cannock Chase Area of Outstanding Natural Beauty
 -  Viewpoint 10km buffer
 -  Setting Zone
 - A: Needwood Farmlands
 - B: East Staffordshire Wooded Plateau
 - C: Rugeley Heathland Edge
 - F: West Midlands and Staffordshire Coalfields
 - G: West Cannock Settled Heathlands
 - H: Staffordshire Plain
 - I: Stafford Centre and Farmland Fringe
 - J: River Trent and Sow Estatelands
- Height at which objects become visible
-  0m (visible)
 -  0 - 10m
 -  10 - 25m
 -  25 - 50m
 -  50 - 75m
 -  75 - 100m
 -  >100m

Note: The ZTV/HOBV is calculated from an observer height of 2m above ground level using APGB 2m Digital Surface Model (DSM). Earth curvature and atmospheric refraction have been taken into account. The ZTV was calculated using ArcMap 10.5.1 software.

Figure 4.5: Zone of Theoretical Visibility (ZTV) for Viewpoint 2 and Setting Zones



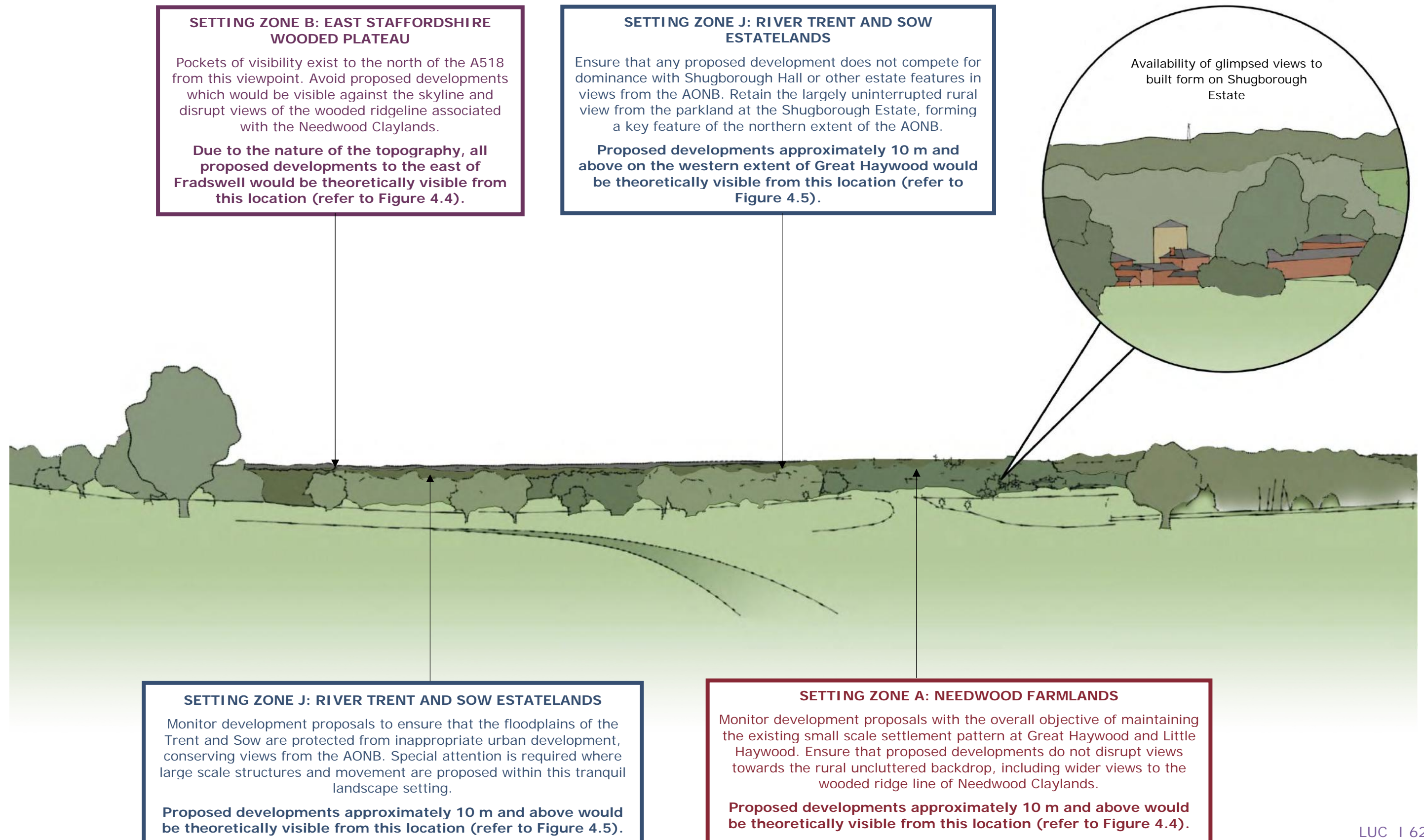
- Viewpoint
 - Cannock Chase Area of Outstanding Natural Beauty
 - Setting Zone
 - A: Needwood Farmlands
 - C: Rugeley Heathland Edge
 - I: Stafford Centre and Farmland Fringe
 - J: River Trent and Sow Estatelands
- Height at which objects become visible
- 0m (visible)
 - 0 - 10m
 - 10 - 25m
 - 25 - 50m
 - 50 - 75m
 - 75 - 100m
 - >100m

Note: The ZTV/HOBV is calculated from an observer height of 2m above ground level using APGB 2m Digital Surface Model (DSM). Earth curvature and atmospheric refraction have been taken into account. The ZTV was calculated using ArcMap 10.5.1 software.



Map scale 1:20,000 @ A3

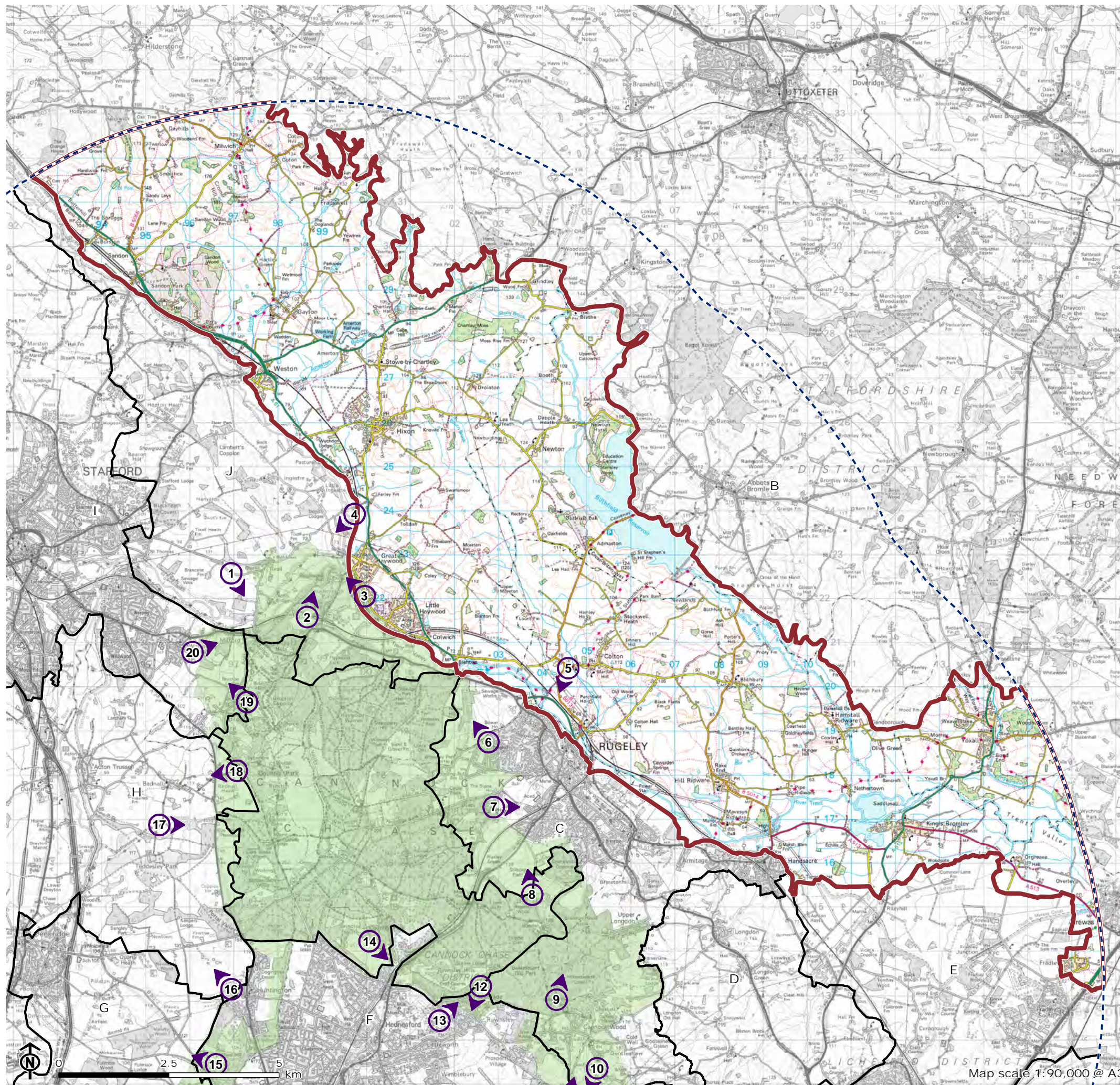
Figure 4.6: Representative Viewpoint 2: View looking north east from the Triumphal Arch at the Shugborough Estate



**Setting Zone A:
Needwood
Farmlands**

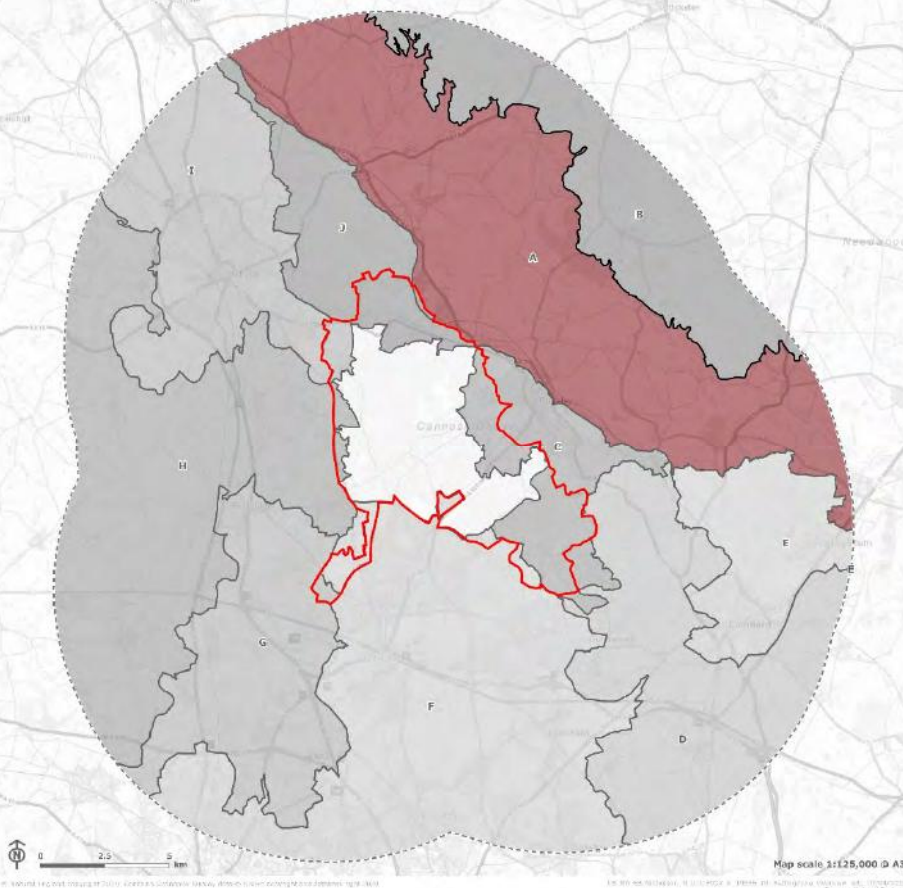


Figure 5.2: Needwood Farmlands Setting Zone



- Viewpoint
- Cannock Chase Area of Outstanding Natural Beauty
- Cannock Chase AONB - 10km buffer
- Setting Zone
- A: Needwood Farmlands

Table 5.1: Setting Zone A: Spatial Guide

Setting Zone A: Needwood Farmlands	LCTs encompassed within Setting Zone A: Needwood Farmlands	Geographical location
	<ul style="list-style-type: none"> Settled Farmlands LCT; River Meadowlands LCT; and Lowland Village Farmlands LCT. 	<p>Comprising a belt of land forming the transition between the valley floor of the River Trent and the wooded ridge line of Needwood Forest, the area is characterised by a patchwork of gently rolling agricultural fields with a clustered settlement pattern.</p>
	<p>Issues / Threats to the AONB</p>	
	<ul style="list-style-type: none"> Erosion of built character and incremental suburbanisation within the larger villages such as Hixon, Little Haywood and Great Haywood - including changes to the distinctive clustered settlement pattern which would be visible in views from higher ground within the AONB. Small scale incremental change in the landscape, such as disruption of the well-defined field patterns, which would alter views towards the patchwork landscape from the AONB. Introduction of severance and intrusion associated with the construction and operation of HS2, including the presence of cuttings (Moreton, Blithbury and Stockwell Heath) and embankments (Trent South, Moreton North, Pipe Ridware and Stockwell Heath). The scheme will result in localised changes to existing undulating landscape character, the loss of field boundary vegetation and the disruption of views towards the AONB. Pressure to develop agricultural land for housing close to existing village settlements including the potential expansion of the urban area of Rugeley. Land at Hixon Airfield is subject to garden settlement proposals, as advised by Stafford BC. The landscape around Colton has been recently subject to development proposals for a large solar Photo Voltaic (PV) farm. The close relationship between Little Haywood and Great Haywood with the AONB boundary is described as a 'Sensitive Edge' within the AONB Design Guide. 	<ul style="list-style-type: none"> Erosion of built character and incremental suburbanisation within the larger villages such as Hixon, Little Haywood and Great Haywood - including changes to the distinctive clustered settlement pattern which would be visible in views from higher ground within the AONB. Small scale incremental change in the landscape, such as disruption of the well-defined field patterns, which would alter views towards the patchwork landscape from the AONB. Introduction of severance and intrusion associated with the construction and operation of HS2, including the presence of cuttings (Moreton, Blithbury and Stockwell Heath) and embankments (Trent South, Moreton North, Pipe Ridware and Stockwell Heath). The scheme will result in localised changes to existing undulating landscape character, the loss of field boundary vegetation and the disruption of views towards the AONB. Pressure to develop agricultural land for housing close to existing village settlements including the potential expansion of the urban area of Rugeley. Land at Hixon Airfield is subject to garden settlement proposals, as advised by Stafford BC. The landscape around Colton has been recently subject to development proposals for a large solar Photo Voltaic (PV) farm. The close relationship between Little Haywood and Great Haywood with the AONB boundary is described as a 'Sensitive Edge' within the AONB Design Guide.
<p>Management Guidelines (relating to views in and out of Cannock Chase AONB)</p>		
<p>Views from the AONB</p>		
<p>Representative Viewpoints 2, 7, 8 and 9 – Refer to Chapter 4: Viewpoint Specific Guide</p>		
<ul style="list-style-type: none"> Conserve the function of the area as a predominantly rural uncluttered backdrop by retaining views to the patchwork field pattern in views from the AONB. The ZTV output for Representative Viewpoint 9 demonstrates the role Setting Zone A plays in providing an agricultural backdrop in views from Castle Ring, where pockets of visibility are afforded towards Colton and Stockwell Heath. Monitor development proposals with the overall objective of maintaining the existing small scale settlement pattern at Great Haywood and Little Haywood in views from the AONB. The strong estate character of the villages due to the associations with the Shugborough Estate should also be conserved. Ensure that proposed developments do not disrupt views towards the background view, including views to the wider wooded ridge line of Needwood Claylands. The ZTV output for Representative Viewpoint 2 indicates that all proposed development within sections of Great Haywood, Little Haywood, Hixon, Gayton, Stowe-by-Chartley, Drointon, Lea Heath and Newton would be theoretically visible from the Shugborough Estate. The use of vernacular building styles / materials for new development within the landscape of the setting zone should therefore be promoted, where appropriate. Explore opportunities to enhance tree cover and reinstate hedgerow boundaries to soften stark settlement edges around in views from the AONB. This is especially relevant to the north and east of Rugeley. Landscape schemes associated with development proposals should also consider opportunities for the mitigation of view interruption as well as the creation of framed vistas where possible. With the exception of shadow effects in the ZTV output associated with Rugeley Power Station and the settlements of Great Haywood, Little Haywood and Rugeley; proposed developments 25 m in height or above within Setting Zone A would be theoretically visible from Representative Viewpoint 8. Seek to retain views and provide a visual link from the AONB to the undeveloped ridge line occupying the remnants of Needwood Forest (Setting Zone B). 		
<p>Views towards the AONB</p>		
<p>Representative Viewpoints 3, 4 and 5 – Refer to Chapter 4: Viewpoint Specific Guide</p>		
<p>Contribution to the significance of Cannock Chase AONB</p> <p>The characteristic farmland vales and patchwork landscape of this setting zone provide the rural backdrop in views from the high ground of the eastern flank of the AONB, contributing to its tranquil character. The setting zone plays an important role in maintaining long distance views to the wooded ridge line associated with the Needwood Claylands (Setting Zone B) in views from the AONB.</p>	<ul style="list-style-type: none"> Consider the effect of proposed tall development within Rugeley and the surrounding urban edge to avoid the disruption of views towards the characteristic wooded plateau of the AONB. Despite the relatively low-lying nature of the landform at the settlement edge, proposed built form within Rugeley would need to reach a height of at least 10 m to be theoretically visible in views towards the AONB from Representative Viewpoint 4. Ensure the visual integration of infrastructure features associated with HS2 through the introduction of landscape mitigation proposals, avoiding any detrimental effects on views towards the AONB itself. Maintain views towards Shugborough Estate as a key heritage asset which forms a distinctive and characteristic feature of the adjoining Setting Zone J. 	



Appendix EDP 3
Representative Photoviewpoints
(edp5977_d008 29 November 2022 RBa/VPo)



To be viewed at comfortable arm's length



To be viewed at comfortable arm's length



To be viewed at comfortable arm's length

Photoviewpoint EDP 4: View from public footpath (Ref. Colwich 46) looking west across the site



To be viewed at comfortable arm's length



To be viewed at comfortable arm's length



To be viewed at comfortable arm's length



To be viewed at comfortable arm's length



To be viewed at comfortable arm's length



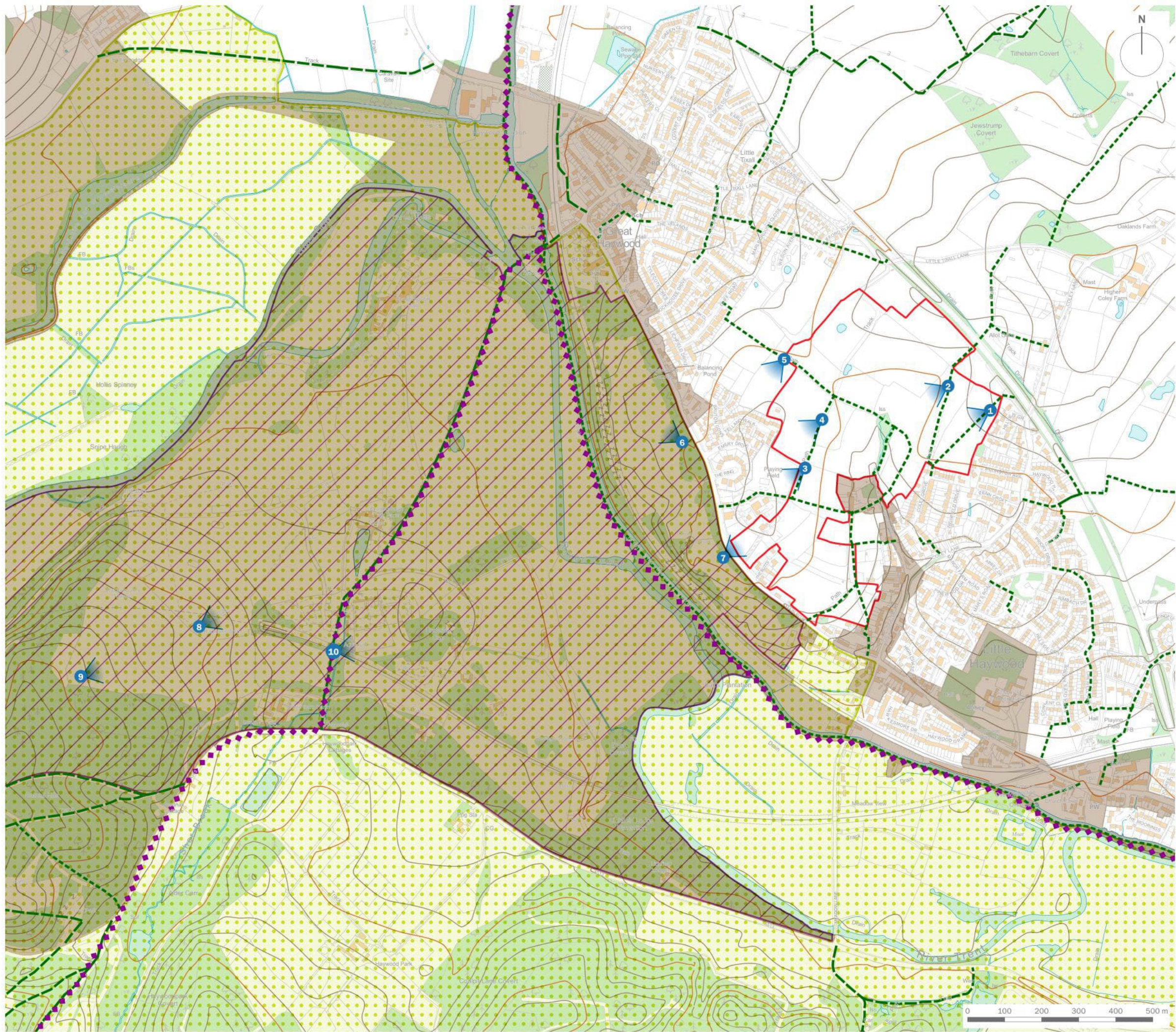
To be viewed at comfortable arm's length











To be viewed at comfortable arm's length



Plan EDP 1
Representative Photoviewpoint Locations
(edp5977_d009 29 November 2022 RBa/VPo)



-  Site Boundary
-  Cannock Chase Area of Outstanding Natural Beauty (AONB)
-  Shugborough Registered Parks and Garden
-  Great Haywood and Shugborough Conservation Area
-  Promoted Route: Staffordshire Way
-  Footpath
-  Bridleway
-  Photoviewpoint Location

client	Bellway South Midlands		
project title	Land at Little Haywood, Staffordshire		
drawing title	Representative Photoviewpoints		
date	29 NOVEMBER 2022	drawn by	RBa
drawing number	edp5977_d009	checked	VPO
scale	1:10,000 @ A3	QA	JFr



Little Haywood, Staffordshire

Briefing Note – Heritage

edp5977_r006a

1. Introduction

- 1.1 This Briefing Note provides a summary of the key considerations in relation to proposed housing allocations within Stafford Borough Council's (SBC's) *Stafford Borough Council Local Plan 2020–2040*. More specifically, the note reviews and considers the findings of the Council's evidence base in relation to the historic environment for sites Col 10 and Col 13, which it does not currently intend to take forward as draft residential allocations.
- 1.2 The two sites in question lie to the north-west of the village of Little Haywood (and Colwich) and to the south of the village of Great Haywood. Little Haywood lies to the north of the West Coast Mainline railway, whilst Colwich is nestled between the West Coast Mainline railway and the Trent and Mersey Canal, with the River Trent immediately adjacent.

2. Background

- 2.1 In 2020 Stafford Borough Council (SBC) commissioned AOC Archaeology Group to undertake an Historic Environment Site Assessment (HESA), which forms part of the evidence base that has been used to inform site selection for the Council's forthcoming Local Plan.
- 2.2 This evidence base comprises a 'Stage 1' assessment of potential development sites put forward within the 2020 call for sites. The study identifies those sites where development within a proposed allocation area is predicted to have impacts upon heritage assets which, in their view, could not be resolved through the application of mitigation measures.
- 2.3 AOC (2020) have considered the proposed allocation sites Col 10 and Col 13. For Col 10, the assessment concludes a predicted 'low' direct impact and a 'medium' potential for setting impacts on the Great Haywood Conservation Area and Shugborough Park Grade I Registered Park and Garden (RPG). For Col 13, AOC's historic environment assessment concludes that there is the potential for 'high' impacts on, primarily, the adjacent Colwich and Little Haywood Conservation Area and the 'potential' for substantial harm.
- 2.4 SBC has therefore declined to take either of the two sites forward as a draft allocation, albeit citing heritage concerns for **only** the larger Col 13, whereby they note that *inter alia* heritage concerns are unlikely to be able to be suitably mitigated for within the development proposals.
- 2.5 Conversely, SBC only cites access, landscape, ecology and education provision (not heritage) as reasons why Col 10 has been rejected and is not being taken forward as a draft allocation through the emerging Local Plan process.



3. Review

3.1 It is noted above that AOC Archaeology Group identify only the *potential* for substantial harm to arise from the development of the site. It is worth reviewing the conclusions on this and the implications it has on the potential development of the site because there are fundamental flaws with this conclusion. There also seems to be a slight disconnect between the AOC narrative and the ‘substantial’ harm conclusion.

3.2 Regarding methodology, AOC identify in paragraph 3.11 that the identification of potential effects on designated heritage assets are expressed in terms of ‘less than substantial’ and ‘substantial’ harm, thus reflecting the wording of the National Planning Policy Framework (NPPF; 2021).

3.3 They proceed in paragraph 3.12 to note the guidance in the Government’s Planning Practice Guidance (PPG) that “*substantial harm is a high test*”. Furthermore, they recognise, in the same paragraph, that ‘any such assessment’ depends on the predicted impacts resulting in:

“a major impediment to the ability to understand or appreciate the heritage asset or historic landscape in question by reducing or removing its information content, to the extent that the consequent harm resulted in a major reduction or total loss of its cultural heritage value “

3.4 Setting aside the inclusion of ‘historic landscape’ for the time being; it not being a designated asset unless conferred as such through an RPG designation for instance; AOC fully recognise that, for a proposal to result in substantial harm, the harm should result in “*a major reduction or total loss of its cultural heritage value*”. This follows established case law, for example in Paragraphs 24 and 25 of *Bedford BC v Secretary of State for Communities and Local Government* [2013] EWHC 2847 which outlines the assessment of harm:

“What the inspector was saying was that for harm to be substantial, the impact on significance was required to be serious such that very much, if not all, of the significance was drained away.

Plainly in the context of physical harm, this would apply in the case of demolition or destruction, being a case of total loss. It would also apply to a case of serious damage to the structure of the building. In the context of non-physical or indirect harm, the yardstick was effectively the same. One was looking for an impact which would have such a serious impact on the significance of the asset that its significance was either vitiated altogether [i.e. destroyed] or very much reduced.”

3.5 In other words, for the ‘harm’ to be ‘substantial’, the proposal would need to result in the asset’s significance either being “*vitiated altogether or very much reduced.*”

3.6 However, whilst it is clear from the above that AOC clearly recognise the high threshold required for ‘substantial’ harm to accrue, this does not appear to be translated into their Sensitivity Scoring Criteria in Table 1, whereby they note for indirect, or setting, impacts that a high sensitivity would result from:



“An impact upon the setting or character of a designated asset or area is predicted that would compromise its cultural heritage value to the extent that the attributes that led to its designation, or the ability to understand and read its historic, context are diminished and compromised.

This would involve a loss of significance that could not be resolved through mitigation.”

- 3.7 So, by this measure, AOC clearly identify that a ‘high’ sensitivity rating would result from merely a ‘diminishing’ or ‘compromising’ of a heritage asset through change within its setting, as it makes no provision for the degree of harm. Furthermore, the criteria for a ‘medium sensitivity’ is classified as follows:

“An impact upon the setting or character of a designated asset or area is predicted. However, this would not compromise the cultural heritage value to the extent that the attributes that led to its designation or the ability to understand and read its historic context would be diminished or compromised. The overall significance of the asset would not therefore be materially changed”

- 3.8 Given that the application of ‘medium’ sensitivity would result in no change to a designated heritage asset’s significance, it would appear that by utilising the AOC methodology, **any** impact whatsoever on the significance of a designated heritage asset would necessarily be put in the ‘high’ category regardless of its scale.

- 3.9 Turning to the specific consideration of the COL 13 site, the AOC assessment’s commentary notes that:

- The eastern boundary of the Shugborough Park Grade I RPG (NHL No.1001167) and the Great Haywood Conservation Area extend to within 5m of the site boundary if the public road, Main Road, is included;
- Considerable care and attention to detail will need to be taken with the proposed access to the site, which could lead to harm;
- Care will need to be taken to ensure that any development would not increase traffic levels to the extent that the characters of the Colwich and Little Haywood and the Great Haywood and Shugborough Conservation Areas or the approach to Shugborough Park would be harmed;
- The site directly borders the Colwich and Little Haywood Conservation Area, and care will need to be taken to protect the character of this designation;
- It may not prove possible to successfully deliver residential development within some parts of the site; and



- Potential effects of development upon both the historic character of the non-designated Main Road and the integrity of the individual identities of the two settlements of Great and Little Haywood will still require detailed consideration.

3.10 However, despite claiming to have done so in the methodology, there is no evidence that the assessment has followed the stepped process for identifying effects through change within the settings of heritage assets as per the Historic England Guidance GPA 3 (2017) and there was no site visit.

3.11 Indeed, to all intents and purposes, the methodology that is presented in paragraph 3.20 is the correct approach:

- *“What contribution the site makes to the significance of heritage assets;*
- *How the significance of heritage assets would/could be affected by proposed development should the site come forward;*
- *Where setting of designated heritage assets could be affected, identification of what contribution setting makes to the significance of relevant assets;*
- *Whether there are opportunities to enhance the significance of heritage assets or where there are opportunities to better reveal heritage assets through development;*
- *Whether there are opportunities to reduce heritage at risk through proposed development at proposal sites.”*

3.12 However, there is nothing presented which shows or suggests that these steps have actually been undertaken in the completion of the site assessment.

3.13 For example, there is no description of the character and appearance of the Colwich and Little Haywood Conservation Area or the contribution made by its setting, nor does AOC’s commentary show or suggest much understanding of the significance of the Grade I registered Shugborough Park.

3.14 The AOC makes statements on how these designated assets may be harmed, but it makes no attempt to explain how or why this harm would occur or what aspects of their significance would be lost or damaged.

3.15 Without first specifically identifying whether, why, in what way(s) and to what extent the land within the site contributes to the significance of the heritage assets in question, it is scarcely realistic to contend that it is possible to identify whether they would be harmed by its development or to what extent they would be harmed by its development.

3.16 Indeed, with this methodological shortcoming in mind, it is notable that AOC do not actually explicitly state that the proposals *would* lead to substantial harm; there is only the *potential*; an



assessment which might reasonably be true of any site and not something which is directly and specifically applicable to this site in isolation.

3.17 Whilst AOC note that it may not be possible to develop some parts of the site, this does not in itself preclude development from other parts of the site which could avoid these areas, thus avoiding or minimising the effects identified. It would be more accurate to say that the presence of these assets may form a constraint to the masterplan or the capacity of the site, but in themselves they do not preclude development of the site in its entirety.

3.18 Turning to the site itself, and whether the proposals could actually lead to substantial harm on a conceptual level, it is noted above, and indeed by AOC, that substantial harm is a high threshold, and occurs with “*such a serious impact on the significance of the asset that its significance was either vitiated altogether [i.e. destroyed] or very much reduced.*”

3.19 Commonly such affects arise through direct physical impacts on an asset rather than change within its setting. With few exceptions, designated assets are designated due to the heritage interest held within the fabric of the buildings or components within a designated area, such as a conservation area. Setting, in contrast, is not a heritage asset, but its importance lies in what it contributes to the significance of the asset. So, in order to for an impact to arise, an impact will most likely be eating into the very heart of why an asset was designated in the first place, rather than the general character of its wider surroundings.

3.20 In terms of setting, the Secretary of State’s Decision [Ref. APP/H5390/V/21/3277137] in reference to proposals at Edith Summerskill House provides a useful commentary on the harm which would be caused to designated heritage assets as a result of changes within their setting, and more specifically how they place that harm on the scale harm in the NPPF.

3.21 The important observation is in paragraph 12.50 of the Inspector’s Report (IR), where the Inspector considers the approach to be taken to the assessment of where on the spectrum of ‘less than substantial harm’ an individual impact is located:

“In cases where the impact is on the setting of a designated heritage asset, it is only the significance that asset derives from its setting that is affected. All the significance embodied in the asset itself would remain intact. In such a case, unless the asset concerned derives a major proportion of its significance from its setting, it is very difficult to see how an impact on its setting can advance a long way along the scale towards substantial harm to significance.”

3.22 The Inspector, endorsed by the Secretary of State, then sums up on this matter in paragraph 12.54, tying their assessment in with the approach set out in the Framework:

“It is often argued that such an approach leads to harm to the significance of a designated heritage asset being underestimated. However, what is under consideration is the impact of change on the significance of a designated heritage asset. If that change would come about as a result of development in the setting of that asset, then it is only the component of significance



that the asset derives from its setting that would be affected. This is the outcome of the approach the Framework takes.”

- 3.23 In this context, the AOC report recognises that the proposed development of Col 13 would not have a direct effect on a designated heritage asset. As such, any perceived effects to designated heritage assets would be considered to arise from changes within their setting and would not bear upon the physical form or fabric of the assets themselves.
- 3.24 Taking into consideration the above; whilst it is possible (indeed probable) that the land within the site boundary represents an element of the setting of these off-site assets which contributes to their significance, and development has the potential to adversely affect this contribution to the detriment of these assets; it is quite clear that this would land firmly within the ‘less than substantial harm’ category and that the majority of what is significant about these assets; i.e. their physical integrity; would not be destroyed or very much reduced.
- 3.25 Given this, the ‘potential’ for ‘substantial’ harm identified by AOC for development is quite evidently over-stated when it is properly considered and understood that the entirety of the significance bound up in the physical form and fabric of the relevant designated assets would remain completely intact and unaffected; whilst at the same time it is true to conclude that even the portion drawn from their wider setting would not be lost altogether.
- 3.26 When the impact of the site’s development is properly contextualised in line with the totality of the assets’ significance (from their physical form and fabric and setting), it is quite apparent that at most it could result in ‘less than substantial harm’. This is concluded even without considering any potential mitigation, which may be put in place to help to reduce or minimize such harm, as per Step 4 of the Historic England guidance.
- 3.27 Notwithstanding this, it is also worth considering what the NPPF says when it comes to decision making in cases where there would be heritage harm. Paragraph 199 of the NPPF directs the decision maker to place ‘great weight’ on the asset’s conservation within the planning balance. Furthermore, in cases of ‘less than substantial harm’, paragraph 202 states that this harm should be weighed against the public benefits of the proposal. Here it should be noted that public benefits can include heritage benefits, including securing the optimum viable use, sustaining, or enhancing the significance of a heritage asset or reducing or removing risks to a heritage asset. Paragraph 202 also allows for ‘non heritage’ benefits to be taken into account as described in the PPG (paragraph 020) as being:

“anything that delivers economic, social or environmental objectives”.

- 3.28 In other words, the identification of *potential* ‘less than substantial harm’ ought not to preclude the site’s allocation for development because it could well be the case that, when they are properly quantified and understood, the public benefits of delivering development could outweigh that harm.



- 3.29 In that respect, it may be the case that the ‘potential’ impacts of development on off-site designated heritage assets may bear upon the site’s capacity, but there is no reason to believe or expect that they would preclude or restrict its deliverability in line with the relevant national and local planning policy framework.
- 3.30 Accordingly, it is assessed that Col 13’s exclusion from the Local Plan as a draft residential allocation is considered to be pre-emptive, on the basis that there is not currently any evidence to demonstrate that impacts on off-site heritage assets arising from its development could not be avoided or minimised through the application of detailed design measures or that the public benefits that would be delivered by the site’s allocation and development would not counter-balance or in fact outweigh the ‘less than substantial harm’ which might be generated.
- 3.31 The site and surroundings were visited by an experienced consultant in November 2022 to establish the baseline situation on the ground and in relation to the designated assets. It should be noted that the AOC assessment did not include a site visit as part of their Stage 1 assessment. Primarily the site visit focused on the Colwich and Little Haywood Conservation Area, and listed buildings therein, and the Grade I RPG at Shugborough.
- 3.32 The visit established that the site does lie within the setting of these assets, but its contribution to their significance varied. It was considered that development on the site as a whole would potentially lead to harm, but that this would not reach the high bar of substantial harm as the significance embodied in the asset itself would remain intact. As such, unmitigated, harm would lie at the ‘less than substantial’ level.
- 3.33 This does not take into account any mitigation, which could be achieved through sensitive masterplanning of the site which could help to minimise the potential harm.

4. Conclusions

- 4.1 In light of the above, it is quite clear that the Council’s exclusion of site Col 13 because of the identification of ‘potential’ substantial harm is unjustified because the impact of development on designated heritage assets has (without question) been over-stated.
- 4.2 The PPG and case law tells us that ‘substantial harm’ is a high test that will not be reached in many cases and requires much or all of a designated heritage asset’s significance to be lost. This is quite evidently not going to be the case with either the adjacent conservation area or the nearby Shugborough Park RPG, where the vast majority of the aspects which contribute to their total significance would be left intact and undiminished by the site’s development.
- 4.3 Furthermore, the AOC assessment was undertaken without the benefit of a site visit, nor does the potential impacts consider any masterplan proposals which could incorporate mitigation to help minimise any potential harm.



- 4.4 In policy terms alone, the identification of harm is not necessarily a bar to development, as the NPPF allows for public benefits to be taken into account, which could outweigh that harm and so therefore the perceived impact of the site's development on off-site designated heritage assets should quite evidently not represent a reason for not taking the site forward through the Local Plan process and instead excluding it at this early stage.
- 4.5 In light of the available information, it is considered that the evidence is not strong enough at this stage to identify 'substantial' harm and it is more likely, at the most, that the proposals could lead to 'less than substantial harm' to the adjacent conservation area, and potentially the RPG at Shugborough.
- 4.6 Further assessment is likely to be needed to establish any mitigation and master planning of the site, but at this stage there is no reason to believe that the site could not be taken forward and delivered in accordance with the current planning policy framework and therefore represent a sound inclusion as a draft residential allocation within the Local Plan.

Little Haywood, Staffordshire

Ecology Technical Note November 2022

edp5977_r005a

1. Introduction

1.1 This Technical Note has been prepared by The Environmental Dimension Partnership Ltd (EDP) on behalf of Bellway Homes Limited. It provides further information to support the proposed allocation of an area of land at Little Haywood for residential development in the emerging Stafford Local Plan. The land submitted by Bellway has been assessed as a whole (SHEELA ID Code: COL13) and as a smaller first phase within the wider site area (SHEELA¹ ID Code: COL10). Unless otherwise specified, this Technical Note is referring to COL13 (hereafter referred to as 'the Site').

1.2 The scope of the Technical Note is as follows:

- To present the findings of an additional Phase 1 habitat survey conducted across the Site in November 2022; and
- To review the findings of the Stafford Borough ecological assessment of potential new Local Plan sites (SBEA)², as far as this relates to the Site, and how this has influenced the Council's overall assessment of the Site's suitability for development.

1.3 This Technical Note should be read in conjunction with EDP's previous Ecology Technical Note (report ref. edp5977_r003, March 2020, see **Appendix EDP 1**) which sets out the findings of a preliminary site walkover and desk study records search.

2. Phase 1 habitat survey November 2022

Methodology

2.1 A Phase 1 habitat survey was undertaken on 25 November 2022 by a field ecologist with over thirty years' experience of botanical survey and habitat assessment throughout the UK. The purpose of the survey was to map and evaluate the habitats present within the Site at a greater level of detail than had been done during EDP's preliminary walkover in February 2020 and, in doing so, to confirm whether habitat of medium and high value/distinctiveness is as extensive across the Site as is suggested by the SBEA.

¹ Strategic Housing and Employment Land Availability Assessment

² Stafford Borough – Ecological assessment of potential new Local Plan sites using Nature Recovery Network (NRN) mapping and submitted sites. Staffordshire Wildlife Trust 2021.



- 2.2 Weather conditions were optimal during the survey, namely dry, still, and bright, and followed several weeks with much rain and relatively mild temperatures. There was full survey access throughout the Site. Each field was walked in a randomised zig-zag manner such that the majority of the grassland habitat could be satisfactorily assessed for its botanical interest. The dominant vascular plant species were recorded, and notable vascular plant species were sought – such as species which could indicate older and more species-rich swards. Brief notes were made on the relative abundances of the main species identified; these were objective assessments but did not follow the DAFOR methodology or any other systematic botanical methodology.
- 2.3 November is outside of the optimal period for general habitat survey (April-October) and outside of the optimal period for detailed botanical survey of grassland (May-July) and it was therefore not possible to obtain a comprehensive botanical species list for the habitats present on-site. However, owing to the nature of the habitats present and the experience of the surveyor (together with the presence of survey information from the walkover in March 2022), a robust assessment of the broad habitat types present could still be undertaken.

Results

- 2.4 The full results of the Phase 1 habitat survey are provided in **Appendix EDP 2**.
- 2.5 In summary, the Site comprises twenty contiguous pasture fields with boundaries which are predominantly hedgerows, although some boundaries are solely fences. Sheep graze most of the Site but cattle and horses graze the southern fifth of the site.
- 2.6 A small stream runs through the northern half of the Site and for part of its course lies within a small area of broadleaved semi-natural woodland. Small areas of scrub are present, mainly on the sides of embankments or gullies and there is also an abandoned garden and orchard, associated with a derelict house and smallholding; this abandoned area is effectively scrub habitat with areas of tall ruderal vegetation.
- 2.7 With regard to the grassland habitats, **Table EDP 2.1** below provides a summary of the broad habitat types recorded with reference to both Phase 1 Habitat and Defra Biodiversity Metric classification.

Table EDP 2.1 Summary of grassland habitats within the Site

Phase 1 Habitat Type	Biodiversity Metric		Approximate Extent (Hectares)	Coverage of Site (%)
	Habitat Type	Distinctiveness		
Improved grassland	Modified grassland	Low	7.8	25.1
Poor semi-improved grassland	Modified grassland	Low	16.3	52.4
Semi-improved neutral grassland	Other neutral grassland	Medium	5.15	16.6
Semi-improved acid grassland	Other lowland acid grassland	Medium	0.15	0.5



- 2.8 As the table above demonstrates, based on the survey findings, low value grassland (i.e. habitat of low distinctiveness as defined by the Biodiversity Metric) makes up approximately 77.5% of the total Site area, with medium value grassland (habitat of medium distinctiveness) making up approximately 17%.
- 2.9 It does not appear as though the semi-improved neutral and acid grassland habitats are sufficiently botanically rich as to meet the relevant Priority habitat definitions (namely Lowland Meadow and Lowland Acid Grassland respectively) as published on the JNCC website³. However, this is based on a survey conducted at a sub-optimal time of year. Furthermore, the presence of waxcap fungi (*Hygrocybe* sp.) in two of the fields (**F12** and **F16** – see **Appendix EDP 2**) is of note as these fungi typically indicate long-established swards which have not been intensively managed (albeit these fields comprise only 8% of the Site). A detailed botanical survey at the optimal time of year (May-July) is therefore required to confirm the grassland value and presence of absence of Priority grassland habitat.

3. Review of the Stafford Borough Ecological Assessment (SBEA)

- 3.1 The SBEA includes an individual assessment of both COL10 and COL13 land areas being promoted through the Local Plan.
- 3.2 Both land areas are given an overall ecological sensitivity rating of 'High' based on a range of factors including the distinctiveness of the habitats present and the presence of Priority habitats. However, with respect to the habitat information used in its assessment, the SBEA acknowledges that: *"Some sites may only have part of the site area mapped and the quality of available habitat data may not always accurately reflect the current status of what is present on site"*.
- 3.3 Whilst the additional Phase 1 habitat survey presented in this Technical Note was undertaken outside of the optimal time of year, the findings are sufficiently robust to conclude that the extent of habitats of High and Medium distinctiveness across the Site are not as extensive as that shown on the SBEA's Habitat Distinctiveness Map for COL13. Furthermore, it is uncertain that any High distinctiveness/Priority grassland habitats are present at all.
- 3.4 The SBEA's assessment for COL13 rates potential impacts on nearby designated conservation sites as 'Medium-high'- based on proximity to designated sites in the vicinity⁴, most notably Cannock Chase SAC. However, this is somewhat misleading and does not, for example, acknowledge that a strategic mitigation solution is in place for residential development within the zone of influence for recreational impacts on the SAC whereby developer contributions are collected to fund access management and monitoring.

³ <https://jncc.gov.uk/our-work/uk-bap-priority-habitats/>

⁴ See EDP Ecology Technical Note March 2020 for full consideration of designated sites within the Site's potential zone of influence



- 3.5 Similarly, the SBEA's assessment for COL13 rates potential impacts on protected or notable species as 'High' based on the known presence of great crested newts in the two on-site ponds, and the potential for other species to be present⁵. This is also somewhat misleading as, for a site of the scale of COL13, there would be significant scope to avoid or mitigate for impacts on protected species, to compensate for impacts which could not be avoided and to provide enhancement above the existing baseline.
- 3.6 Finally, the SBEA notes that the Site *"represents an area of habitat connectivity between the habitats in the open countryside to the North and the regionally and locally important habitats at Shugborough and Cannock Chase. Complete loss of this band of connectivity would sever a key habitat link in the local area."* This again fails to recognise that a sensitive development design is more than capable of retaining and/or creating green corridors to maintain habitat connectivity with the wider landscape.

4. Conclusions

- 4.1 A detailed Phase 1 habitat survey has confirmed that the vast majority (over 75%) of the Site is made up of species-poor grassland that is of low value and distinctiveness. This is a greater coverage than that suggested by the SBEA for COL13.
- 4.2 Whilst there are some grassland habitats of greater botanical diversity, which are of least medium value and distinctiveness, the extent of such habitats is restricted. There is therefore scope to avoid impacts on such habitats through a sensitive development design, and to compensate for unavoidable impacts/loss through the enhancement of other currently poor-quality habitats elsewhere on-site.
- 4.3 When considering the habitats present on-site, together with the other key elements of the assessment which lead to an overall ecological sensitivity rating of High for COL13 (and COL10), it is apparent that these matters do not represent 'in principle' constraints to development coming forward. This is because potential impacts upon all relevant ecological features/receptors (namely designated sites, habitats and species), can be readily avoided or reduced to insignificant levels through sensitive design and an appropriate mitigation strategy. Furthermore, the incorporation of a well-considered green infrastructure network within the development layout could ensure that habitat connectivity within the Site and in the surrounding landscape is maintained.
- 4.4 The Council's Site Selection Assessment of COL13, set out in the latest SHEELA, proposes to reject this Site from being allocated in the Local Plan. This conclusion has been reached partly with reference to the High ecological sensitivity rating given in the SBEA despite the fact that, for the reasons summarised above, this rating does mean the Site is unsuitable for development.

⁵ See EDP Ecology Technical Note March 2020 for full consideration of protected/notable species potentially present within the Site



- 4.5 The Council's assessment also notes that COL13 lies within a 'Red' great crested newt risk impact zone, based on the NatureSpace great crested newt district licensing scheme which is in operation in Staffordshire and reflecting the known presence of this species in the two on-site ponds. Whilst the presence of great crested newts on-site, and being in a Red zone, means that a future development at the Site will require appropriate mitigation and licensing, it does not in any way preclude development at the Site. To the contrary, the district licensing scheme was introduced by the Government to streamline the licensing process and to facilitate development rather than to resist it.
- 4.6 The Council's final reasoning statement which aims to justify rejection of the COL13 from allocation includes the following wording: "...ecology....concerns are unlikely to be able to be suitably mitigated for". For the reasons given above, EDP concludes that all relevant ecological concerns/potential impacts could be mitigated and therefore strongly disagrees with this element of the Council's overall assessment of COL13.
- 4.7 EDP's conclusions and reasoning also apply to COL10, which has also been rejected by the Council in part on ecology grounds. It is also relevant to note that, when determining an appeal for a previous planning application for 60-65 dwellings⁶ within the COL10 portion of the Site, the Inspector stated (at paragraph 40 of the appeal decision, July 2015) that:

"I am satisfied that the proposed development would not cause any significant harm to protected species or their habitat, subject to controls and mitigation that could be secured via planning conditions."

⁶ Council planning ref. 14/20477/OUT; PINS appeal ref. APP/Y3425/W/15/3003745

Little Haywood, Staffordshire
Ecology Technical Note November 2022
edp5977_r005a



Appendix EDP 1
EDP Ecology Technical Note March 2020

Little Haywood, Staffordshire

Ecology Technical Note

edp5977_r003

1. Introduction

- 1.1 This Technical Note has been prepared by the Environmental Dimension Partnership Ltd (EDP) on behalf of Bellway Homes Limited to inform the proposed allocation of an area of land at Little Haywood for promotion through the planning process (split into two phases but hereafter, together, referred to as 'the Site'). Location of the Site is shown on **Appendix EDP 1**.
- 1.2 The Site covers approximately 6.8 hectares (ha) and is centred at approximately Ordnance Survey Grid Reference (OSGR) SK 005 222 between the villages of Great Haywood and Little Haywood in Staffordshire. It is bounded by the A51 to the north-east and Main Road to the south-west. The land falls within the Local Planning Authority (LPA) area of Stafford Borough Council and Colwich Parish Council.
- 1.3 The purpose of this Technical Note is to consider the ecological sensitivities pertaining to the Site and identify opportunities and constraints which influence its potential to support residential development.

2. Methodology

- 2.1 This Technical Note has been informed by a desk study, which involved the collation of information on designated sites and species records from online resources and Staffordshire Ecological Record (see **Appendix EDP 2**), and an Extended Phase 1 Survey of the Site undertaken by an experienced ecologist in February 2020.
- 2.2 Although February is considered to be a sub-optimal time of year for Extended Phase 1 surveys, for the purposes of providing high level information to inform potential opportunities and constraints afforded by the Site, the findings are not considered to be significantly limited by seasonality.

3. Potential Constraints

Statutory Designations

- 3.1 Whilst three international statutory designations (Cannock Chase Special areas of Conservation (SAC), Paturefields Saltmarsh SAC and Charley Moss SAC/Ramsar) and four nationally designated sites (Rawbones Meadow Site of Special Scientific Interest (SSSI), Stafford Brook SSSI, Baswich Meadows SSSI and Blithfield Reservoir SSSI) lie within the



potential Zone of Influence (Zol) of the Site¹. Further details on each site are provided in **Appendix EDP 2**. The intervening distances between these designated sites and the Site means that development is unlikely to have a direct impact on these designations. However, there is a potential for indirect impacts, particularly those arising from increases in recreational pressure and these are discussed in turn below.

Cannock Chase SAC

- 3.2 Cannock Chase SAC lies approximately 1km south of the Site at its closest point. Cannock Chase SAC Development Management Policy NR7 states:

“Any development that results in a net increase in dwellings within a 15km radius of any boundary of Cannock Chase SAC (as shown on the Policies Map) will be deemed to have an adverse impact upon the Cannock Chase SAC unless or until satisfactory avoidance and/or mitigation measures have been secured.”

- 3.3 Despite the acknowledged 15km Zol, financial contributions for the required mitigation are being sort in the 0-8km zone only. Therefore, development within the study area should expect to contribute financially to the mitigation Strategy for Cannock Chase SAC.

Pasturefield Salt Marsh SAC

- 3.4 The Natura 2000 form for this Site² does not list any current threats to this habitat. Therefore, it is assumed that it is on private land and thus no residential impacts will occur.

Chartley Moss SAC, Ramsar, NNR

- 3.5 Chartley Moss lies 5.7km north. Its threats from external sources include changes to hydraulic conditions, air pollution, hunting of wild animals and changes to ground water³. There is no public access to this site. There is also no hydraulic connectivity between the Site and this SAC/Ramsar/NNR. Therefore, development at the Site is not considered likely to impact this designated site.

Rawbones Meadow SSSI

- 3.6 With regards to Rawbones Meadow SSSI, the Site falls within the Impact Risk Zone⁴ where for *“any residential developments with a total net gain in residential units”*, the LPA should consult Natural England (NE) on likely impacts on the SSSI.

¹ Zone of Influence - the areas and resources that may be affected by the proposed development

² <https://jncc.gov.uk/jncc-assets/SAC-N2K/UK0012789.pdf>

³ <https://jncc.gov.uk/jncc-assets/SAC-N2K/UK0013595.pdf>

⁴ Natural England (2016) Natural England's Impact Risk Zones for Sites of Special Scientific Interest: User Guidance v2.5.

Available from:

http://magic.defra.gov.uk/Metadata_for_magic/SSSI%20IRZ%20User%20Guidance%20v2.5%20MAGIC%2010Mar2016.pdf.



- 3.7 It is considered that any adverse recreational impacts could be readily mitigated through sensitive scheme design that provides adequate recreational opportunities for the new residents.

Stafford Brook, Baswich Meadows and Blithfield Reservoir SSSIs

- 3.8 The intervening distance between the Site and Stafford Brook (2.7km), Baswich Meadows SSSI (4.9km) and Blithfield reservoir SSSI (4.5km) and the lack of any terrestrial or hydrological links mean that development at the Site is unlikely to have a significant negative impact on these SSSIs. None of these remaining sites fall into an Impact Risk Zone whereby the LPA should consult NE.

Non-statutory Designations

- 3.9 Non-statutory designations in Staffordshire are known as Local Wildlife Sites (LWSs) (formerly known as Sites of Biological Importance (SBIs)) which are of county importance. Other designations include Biodiversity Alert Sites (BASs) which are of local importance for nature conservation or of interest for wildlife where there may be potential to improve the habitat to LWS standard with appropriate management.
- 3.10 The Site itself is not covered by any non-statutory designations. However, there are four LWSs (Colwich Brickworks, Shugborough Hall, Tixall Broad Water and Lount Farm) one BAS (land adjacent to Colwich Brickworks) and two Retained BASs (north of Bishton and Wolsley Bridge) that occur within 2km of the Site (details are provided in **Appendix EDP 2**).
- 3.11 Colwich Brickworks, Shugborough Hall and Tixall Broad Water LWSs are a Staffordshire Wildlife Trust reserve, a National Trust Estate and a public waterway, respectively, and thus are already managed to receive a high volume of visitors. Therefore, development at the Site is unlikely to increase recreational impact to a greater level than they are managed to receive. In addition, it is considered that any adverse recreational impacts, if identified, could be readily mitigated through sensitive scheme design that provides adequate recreational opportunities within the proposed development.
- 3.12 The intervening distance between the Site and Lount Farm LWS, Bishton retained BAS and Wolsley Bridge retained BAS means that it is unlikely that development at the Site will have any significant impact on these non-statutory designations.
- 3.13 Additionally, there are five locally designated green spaces within the Site; Local Green Space (LGS) 4, 5, 6, 7 and 8. LGS 4 and 5 form a contiguous area of land towards the north of the Site and LGS 6, 7 and 8 form a contiguous piece of land towards the south of the Site. These are areas demonstrably special to local communities either for ecological, historic or aesthetic reasons and are covered under Policy CE2 of the Colwich Neighbourhood Plan (where maps of these spaces can also be found) which states that *“the development of local green space is ruled out other than in very special circumstances.”*



- 3.14 In terms of ecology and biodiversity, LGS 4 is reported to contain lowland meadow habitat and Priority butterfly species, LGS 5 contains a pond, LGS 6 is reported to contain species rich hedgerows and LGS 7 contains many trees with Tree Preservation Orders (TPOs).
- 3.15 There is a suite of new evidence documents to support the New Stafford Borough Local Plan consultation 2020-2040 including the 'Stafford Borough Nature Recovery Network Mapping' Report. Within this report, the Site is identified as being within a grassland opportunity area. Priorities for these areas include grassland creation/management and Hedgerow enhancement/management with the report stating that: *"It is critical that areas of high-quality grassland are linked with mosaics of other high-quality grassland to ensure that species reliant upon these habitats are able to move freely between them."*

Habitats

Planning Policy

- 3.16 Habitats are generally covered within the Stafford Borough Local Plan - Policy N4 The Natural Environment & Green Infrastructure:

The Borough's natural environment will be protected, enhanced and improved by:

- a. *Implementation of the Staffordshire Biodiversity Action Plan, the Stafford Borough Green Infrastructure Strategy and guidance including 'Biodiversity by Design' or any other successor documents to increase and enhance biodiversity, in terms of habitats and species as well as geological conservation or geodiversity through appropriate management for a network of...*
- ii. *Biodiversity Action Plan habitats and species populations; and*
- iii. *Wildlife Corridors and Ecological Networks...;*
- c. *Protecting, conserving and enhancing the natural and historic environment and irreplaceable semi-natural habitats, such as ancient woodlands, and ancient or veteran trees;*
- d. *Increasing the ability of landscapes and ecosystems to adapt to different weather patterns and climate change, by increasing the range and extent of habitats, informed by Biodiversity Opportunity mapping...;*
- f. *Any new development where damage to the natural environment is unavoidable must include measures to mitigate and/or compensate such impacts, through the establishment of replacement habitats or features, including appropriate site management regimes. The Borough's green infrastructure network, as defined on the Policies Map, will be protected, enhanced and expanded; and*



- g. *Networks of open spaces for formal and informal recreation, natural corridors, access routes and watercourses will be enhanced and created...*"

Habitats on Site

- 3.17 The Site itself is an extensive system of grazed pasture fields delineated by hedgerows, many of which are defunct and species poor. There are two ponds on site and two others within 250m. There is also a stream in the centre of the Site with steep wooded banks.
- 3.18 Online resources do not list any Priority Habitats within the Site. The closest Priority Habitat listed is the 'Wood Pasture and Parkland' and 'Deciduous Woodland' within the Shugborough estate.
- 3.19 The majority of the pasture land is heavily improved and is not considered to pose a potential constraint to development. However, as that within LGS 4 is reported to contain lowland meadow species, further detailed botanical surveys are required to determine the value of the pasture. With respect to some of the hedgerows, the stream and its wooded banks and the ponds, these are likely to meet the criteria for Priority Habitats.

Protected and Notable Species

- 3.20 The desk study identified records for a number of protected species within 1km of the Site, as summarised in **Appendix EDP 2**. No records of notable plant species were returned.
- 3.21 Based on the nature of the habitats present within the Site, and the immediate surroundings, there is the potential for the following assemblages of protected and notable species (species considered to be locally rare or listed as being of conservation concern at a local or national level) to occur.

Breeding Birds

- 3.22 A number of records of species associated with Cannock Chase SAC were received as well as records of bird species associated with farmland and woodland. A detailed summary of the species recorded is provided in **Appendix EDP 2**.
- 3.23 The Site holds little or no breeding habitat for a majority of the species for which records were returned, including wetland species or heathland specialists from Cannock Chase. The Site does, however, offer breeding and foraging habitat for some of the farmland, woodland and garden species for which records were returned.
- 3.24 Although no records of skylark (*Alauda arvensis*) were returned, the pasture fields that comprises most of the Site have the potential to support this species as well as other ground nesting species such as lapwing (*Vanellus vanellus*) and grey partridge (*Perdix perdix*) (for which records were returned).



3.25 The hedgerows and trees and wooded stream banks are likely to support an assemblage of common and widespread bird species. The single dilapidated farm building on Site also has the potential to support species such as swallow (*Hirundo rustica*) and house martin (*Delichon urbicum*).

Bats

3.26 Records of four common and widespread bat species were returned during the desk study (see **Appendix EDP 2**); soprano pipistrelle (*Pipistrellus pygmaeus*), common pipistrelle (*Pipistrellus pipistrellus*), brown long eared bat (*Plecotus auritus*) and Daubentons Bat (*Myotis daubentonii*). The pipistrelle species are Local BAP species⁵.

3.27 The hedgerows, stream corridor and ponds within the Site are likely to provide foraging and commuting habitat for bats. The habitats on Site likely provide a commuting route to the adjacent offsite habitats on the Shugborough Estate and Cannock Chase.

3.28 The mature trees within the Site and on the boundaries may also potentially support roosting bats. There are no buildings present within the Site which have potential to support roosting bats. However, properties which immediately border the Site may potentially support roosting bats.

Great Crested Newts and other Amphibians

3.29 There are multiple records of great crested newt (*Triturus cristatus*) (GCN) within 1km of the Site. There is a GCN licence in place for Site number 1 on **Appendix EDP 1** which is adjacent to the northwest of the Site. Therefore, as GCN are known to travel up to 500m from a breeding pond, presence within the ponds on Site should be assumed.

Reptiles

3.30 Records of common lizard (*Zootoca vivipara*) were returned from over 1km south of the Site. However, the Site is not thought to provide any suitable habitat for reptiles.

Notable Mammals

3.31 Records of otter (*Lutra lutra*) pole cat (*Mustela putorius*), brown hare (*Lepus europaeus*), badger (*Meles meles*) and hedgehog (*Erinaceus europaeus*) were returned during the desk study. The wooded stream on Site, is shallow and unlikely to hold water for much of the year. It is considered very unlikely to support fish and thus unlikely that it would form part of an otter territory. The Site holds suitable habitat for all of these species with the exception of otter.

3.32 The existing arable and pasture land surrounding the Site is likely to provide sufficient foraging areas for brown hare, badger and polecat, and the existing woodland and scrub both on and

⁵ <http://www.sbap.org.uk/actionplan/species/index.php>



around the Site is likely to provide sufficient foraging and resting areas for hedgehog and badger.

Invertebrates

3.33 There are records of notable moth, bee, beetle and fly species returned from Cannock Chase and the Shugborough Estate with some of the bee and moth records from Little Haywood. The variety of habitats offered by the Site (woodland, hedgerows, ponds and arable land) mean that it is possible for it to support a wide range of invertebrates. However, the predominantly arable nature of the Site will limit the numbers and mean a significant, notable assemblage is unlikely.

4. Key Constraints and Opportunities – Masterplanning Principles

4.1 On the basis of the initial survey work described within this Technical Note it is considered that there are no 'in principle' constraints to the proposed development of the Site. However, impacts on Cannock Chase SAC and some locally valuable habitats and protected species pose some limited constraints to any development and will need further consideration and possible mitigation as discussed below.

4.2 The key constraints associated with the Site are as follows:

- Presence of Cannock Chase SAC less than 1km away will mean financial contributions are required to offset recreational impact;
- Presence of five local green spaces within the Site boundary which are likely to require retention;
- Ecologically valuable habitats; hedgerows and trees, ponds, wooded stream and potential for locally valuable grassland within the Site; and
- Protected species whose presence will need to be confirmed through specific 'Phase 2' surveys (scope to be agreed via consultation with the LPA), but may potentially include great crested newts, breeding birds, bats (roosting and foraging) and badgers.

4.3 It is considered the majority of impacts on habitats and protected species (if present) can be avoided/mitigated/compensated for through the retention and enhancement of key features within the Site as per the following:

- Retention/buffering, where possible, of the on-site habitats and immediately adjacent semi-natural habitats, in particular, the hedgerows, ponds and wooded stream;



- Retention of the ponds and creation of further ponds within a large area of open space that connects the Site to the green space within the development in area 1 (see **Appendix EDP 1**);
- Creation of high-quality grassland areas relevant to the local area within any retained and created green space;
- Enhancement of existing hedgerows, where retained, through selective 'gap' planting with native hedgerow species of local provenance and long-term management for the benefit of wildlife;
- Provision of good-quality informal green space to offset any recreational impacts on the SSSIs and LWSs within the potential Zol;
- Incorporation of a range of bat and bird boxes on retained trees to provide new roosting and nesting opportunities;
- Wildlife-sensitive lighting scheme to minimise the effects of artificial lighting on commuting and foraging bats and other nocturnal wildlife; and
- Provision of Sustainable Drainage Systems (SuDS) features designed to benefit biodiversity through appropriate design, planting and management of surrounding green open spaces.

4.4 It is considered that the habitat creation and enhancement recommendations mentioned previously would provide a net gain in biodiversity in line with the objectives of the and local and national planning policy.

Protected Species

4.5 Given the opportunities to retain and create areas of ecological valuable habitat, it is considered that any potential impacts on protected species such as bats, nesting birds, great crested newt and invertebrates can be avoided through the retention of habitat with any medium to long-term impacts mitigated for, through the creation of areas of higher ecological value within areas of Public Open Space (POS).

4.6 There are two ponds within the Site and the presence of GCN is assumed. It is considered that the potential presence of GCN does not represent a significant constraint to the promotion of the Site but may have a bearing on the extent of the developable area. If the presence of GCN is confirmed, then appropriate mitigation could be achieved through habitat retention, creation and enhancement within the Site and translocation of newts to these areas.



Biodiversity Impact Assessments

- 4.7 Although local planning policies make no specific mention about the requirement for a Biodiversity Impact Assessment (BIA), the National Planning Policy Framework (NPPF) mentions 'securing measurable net gains' and the Biodiversity & Development Supplementary Planning Development Document states that: "*Development will only be permitted where it delivers a net gain for biodiversity*" (see local policy NR3). In addition, the imminent Environment Bill, if passed, will also make a measurable 10% net gain in biodiversity on a site mandatory. Given the intention to create a large country park on the western boundary as well as other areas of POS within the development, and assuming the recommendations regarding retention and enhancement of existing habitat features are implemented; it is considered that the development on the Site is capable of delivering a 10% biodiversity net gain.

5. Conclusions

- 5.1 This Technical Note provides an initial high-level assessment of the Site with respect to identifying key ecological constraints and opportunities to inform a wider assessment of its potential to support future residential development. The desk study has identified the following valuable ecological features within and adjacent to the Site:

- Presence of Cannock Chase SAC within the Zol requiring financial contributions to offset recreational impacts;
- The present of five local green spaces within the Site upon which development should not occur except in special circumstances;
- Hedgerows and trees, two ponds, a wooded stream and potentially valuable pasture within the Site; and
- Potential for GCN, breeding birds, roosting/foraging bats and notable invertebrates to be present (presence to be confirmed by further survey work).

- 5.2 However, there are no obvious 'in principle' (significant) ecological constraints that would preclude development, and which cannot be avoided by good design. Moreover, EDP considers that the Site and wider land parcel presents an opportunity to deliver a net gain to local biodiversity and contribute to the conservation objectives for the local priority species on Site, as well as ensuring local and national policy compliance.

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Ecology Technical Note
edp5977_d003



**Appendix EDP 1
Context Plan**



Appendix EDP 2 Desk study

Methodology

- A2.1 The desk study is an important element of undertaking an initial ecological appraisal of a site proposed for development, since it enables the initial collation and review of contextual information such as designated sites together with known records of protected and priority species.
- A2.2 EDP undertook an ecological desk study for the Site in February 2020 to check for information on designated sites and protected species within the site's potential Zone of Influence⁶ (Zoi). Information was collated from both statutory and non-statutory bodies, including:
- (i) Staffordshire Ecological Record (SER); and
 - (ii) Multi-Agency Geographic Information for the Countryside (MAGIC⁷).
- A2.3 Biodiversity information was requested for the following search areas measured approximately from the red line boundary shown, centred approximately at OSGR SK 004 222.
- (i) 15km radius for sites of European importance;
 - (ii) 5km for sites of national importance;
 - (iii) 2km for sites of local importance;
 - (iv) 2km radius for other protected/notable species records; and
 - (v) 500m radius for Priority Habitats
- A2.4 Any pertinent information received as a result of the updated desk study has been included and specifically referenced within the results section. Data pre-2010 has not been included as it is considered historic. Where more than four locations are returned for a species, a summary is provided.

⁶ Zone of Influence - the areas and resources that may be affected by the proposed development

⁷ MAGIC Partners (2020) Interactive Map. [Online] Available from: <https://www.magic.gov.uk> [Accessed 11 February 2020].

Results

Statutory Designations

- A2.5 International statutory designated sites include Natura 2000 sites regarded as being important at a European level including, Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and globally important wetlands designated as Ramsar Sites. National designations include Sites of Special Scientific Interest (SSSIs) and National Nature Reserves (NNRs). Local Designations include Local Nature Reserve (LNRs).
- A2.6 The Site is not covered by any statutory designations. However, three SACs (one also designated as a Ramsar), four SSSIs occur within the Site's potential Zol.
- A2.7 Details have been summarised in **Table EDP A2.1**, alongside their condition status where applicable⁸.

Table EDP A2.1: Statutory Designations within the Desk Study Search Radius

Site Name	Grid Ref	Approx. Distance from Site	Size (ha)	Interest Feature(s)
SAC				
Cannock Chase	SJ988179	1km S	1244	Annex I habitats: Northern Atlantic wet heaths with <i>Erica tetralix</i> and European dry heath. Nationally important series of relict ancient Forest/Chase landscapes in the Midlands. Important flora (including bryophytes), invertebrate, bird, deer, bat and reptile presence. Largely unfavourable, recovering (90%).
Pasturefields Salt Marsh	SJ991248	2.5km NW	8	Annex I habitat: inland salt meadow. Rare plant community of close affinity with grazed coastal saltmarshes. Important breeding wader presence. Unfavourable, no change.
SAC and Ramsar				
West Midlands Mosses Specifically, Chartley Moss SSSI, NNR	SJ842399	5.7km N	185	Annex I habitats of natural dystrophic lakes and ponds & transition mires and quaking bogs. Composed of a series of SSSIs, with Chartley Moss (105 ha) occurring within the search radius. It is the largest schwingmoor in Britain, which is unfavourable, recovering. Ramsar designation for: Wetlands of importance. A series of lowland open water and peatland sites set in depressions left

⁸ Natural England (2020) Designated Sites View. [Online] Available from: <https://designatedsites.naturalengland.org.uk/> [Accessed 11 February 2020].



Site Name	Grid Ref	Approx. Distance from Site	Size (ha)	Interest Feature(s)
				by receding ice sheets. Includes meres, fringing habitat and schwingmoors. Supports a vast number of rare plant species and invertebrates.
SSSI				
Rawbones Meadow	SJ985225	1.4km W	20	Large, low lying flood meadow in the valley of the River Sow. Long establish neutral grassland and of species interest for species rich rush pasture. Supports regionally significant numbers of snipe (<i>Gallinago gallinago</i>). Unfavourable, recovering.
Stafford Brook	SK023194	2.7km SE	7	Combination of carr woodland, acidic marsh grassland and fen in the valley of the Stafford Brook, a tributary of the River Trent. 59% unfavourable, recovering with the remainder favourable.
Baswich Meadows	SJ950227	4.9km W	13	Unimproved low-lying permanent pasture in the valley of the River Sow. The most important feature is the presence if a semi natural grassland community which is much reduced in lowland Britain. Significant population of waders. Unfavourable, recovering.
Blithfield Reservoir	SK057242	4.5km NE	436	Staffordshire's largest area of standing water. Important for supporting waterfowl and a variety of bird species with 21 species of waterfowl regularly using the site in winter. 100% favourable.

Note: N - North, E - East, S - South, W - West

Non-Statutory Designations

- A2.8 Non-statutory designations in Staffordshire are known as Local Wildlife Sites (LWSs) and are formerly known as Sites of Biological Importance (SBIs) which are of county importance.
- A2.9 Biodiversity Alert Sites (BASs) are of Local Importance for Nature Conservation or of interest for wildlife where there may be potential to improve the habitat to SBI standard with appropriate management.
- A2.10 Additional designated sites which should be considered at this level including Ancient Semi-natural Woodland (ASNW) where these are not covered by other designations.
- A2.11 Four LWSs, one BAS and one Retained BAS occur within the Site's potential Zol as shown in **Table EDP A2.2**.

Table EDP A2.2: Non-statutory Designations within the Desk Study Search Radius

Site Name	Grid Ref	Approx. Distance from Site	Interest Feature(s)
Local Wildlife Sites			
Colwich Brickworks	SK013214	0.9km SE	Also a Staffordshire Wildlife Trust Reserve. Disused quarry and two adjacent fields with several typical disturbed ground habitats thriving colonies of garden escapes with areas of semi-improved neutral grassland.
Shugborough Hall	SJ992225	1km SW	A large ornamental park important for its lowland wood-pasture.
Tixall Broad Water	SJ983226	1.2km NW	A stretch of canal from just south-west of Tixall Lock to Haywood Junction, which has a quite diverse marginal flora and includes locally uncommon species.
Lount Farm	SK035220	2km E	Five fields with unimproved sympathetically managed wet grassland through which several wet ditches cross.
Biodiversity Alert Site			
Colwich Brickworks (land adj. to)	SK015216	0.8km E	A series of fields of semi-improved neutral grassland, managed for both pasture and hay.
Retained Biodiversity Alert Site			
Bishton (north of)	SK021214	1.5km SE	Hedges with a rich complement of woody species.
Wolseley Bridge	SK018204	1.8km SE	A stretch of the Trent and Mersey Canal and an area of planted broadleaf woodland situated adjacent between the canal and the River Trent.

Priority Habitats

A2.12 There are eight Priority Habitats within 500m of the Site. SER have detailed an ancient woodland (Tithebarn Covert) is located 0.7km north. Habitats are discussed in further details within **Table EDP A2.3**.

Table EDP A2.3: Non-statutory Designations within 500m of the Site

Priority Habitat	Approx. Distance from Site	Size (ha)
Deciduous woodland	0.02km S	3
Wood-pasture and parkland	0.03km S	12
Deciduous woodland	0.1km S	1
Deciduous woodland	0.2km S	4
Coastal and floodplain grazing marsh	0.3km S	46
Deciduous woodland	0.3km E	1
Deciduous woodland	0.5km E	<1
Deciduous woodland	0.5km N	2

Protected and Notable Species

Table EDP A2.4: Notable Species Records within the Desk Study Search Radius

Scientific Name	Common Name	Grid Ref	Approx. Distance from Site	Date	Status
Birds					
A majority of the species records returned were of wetland species for which the Site holds no breeding habitat					
barn owl, curlew, dunnoek, lapwing, marsh tit, meadow pipit, reed bunting, short-eared owl, wood warbler, yellow wagtail, yellowhammer, Swift, tree pipit, hawfinch stock dove, cuckoo, lesser spotted woodpecker, merlin, kestrel, pied flycatcher, linnet, grey wagtail, yellow wagtail. Red start, grey partridge, willow		Multiple locations within 2km		2018 - 2010	WCA Sch. 1 BoCC Red and Amber
Reptiles and amphibians					
<i>Bufo bufo</i>	Common toad	SJ999231	0.8km NW	2011	NERC s41
<i>Zootoca vivipara</i>	Common lizard	SJ996204 SK004205 SK003205	1.4km S 1.1km S 1.1km S	2017 2014 2010	NERC s41
<i>Triturus cristatus</i>	Great crested newt	SK007232 SK002225 SK001226	0.7km N 0.2km W 0.3km W	2017 2016 2014	EPS
Mammals					
<i>Meles meles</i>	Badger	Multiple locations within 2km		2018 - 2010	PBA
<i>Lutra lutra</i>	European Otter	Multiple locations within 2km		2017 - 2014	NERC s41
<i>Lepus europaeus</i>	Brown hare	SK000238 SJ986232 SJ9823	1.4km NW 1.8km W Within 2km	2015 2014 2011	NERC s41
<i>Erinaceus europaeus</i>	West European hedgehog	Multiple locations within 2km		2015 - 2010	NERC s41
<i>Mustela putorius</i>	Polecat	SJ992225 SK012204	1km W 1.4km SE	2014 2010	NERC s41
Bats					
<i>Pipistrellus pipistrellus</i>	Common pipistrelle	Multiple locations within 2km (including roosts)		2016 - 2010	EPS NERC S.41
<i>Myotis daubentonii</i>	Daubenton's Bat	SJ995225	0.8km W	2010	
<i>Plecotus auritus</i>	Brown long eared	Multiple locations within 2km (including roosts)		2016 - 2013	



Scientific Name	Common Name	Grid Ref	Approx. Distance from Site	Date	Status
<i>Pipistrellus pygmaeus</i>	Soprano pipistrelle	Multiple locations within 2km (including roosts)		2017 - 2012	
Invertebrates					
Three species of true fly (Diptera)		Various locations within Cannock Chase		2017 - 2010	Rare
Eight species of beetle (Coleoptera)		Within Cannock Chase and Shugborough Estate		2019 - 2018	Rare
Nine species of moth: Buff Ermine, Cinnabar, Dark-barred Twin-spot Carpet, Ghost Moth, Grey Dagger, September Thorn, Shoulder-striped Wainscot, Small Phoenix, Welsh Clearwing		Largely recorded within Cannock Chase but also within the Village of Little Haywood.		2018 - 2011	NERC S.41
Sixteen species of bee: Including: Buff-tailed bumble bee, common carder bee, early bumble bee large red tailed bumble bee, small garden bumble bee, tree bumblebee		Largely within Shugborough Estate with some records within the Village of Little Haywood.		2018 - 2010	NERC S.41

Note: WCA = Wildlife and Countryside Act 1981 (as amended); BoCC = Bird of Conservation Concern, NERC = Natural Environment and Rural Communities Act 2006 EPS = European Protected Species under The Conservation of Habitats and Species Regulations 2017 (as amended) (also known as 'the Habitats Regulations'), PBA = Protection of Badgers Act 1992

Appendix EDP 2 Phase 1 Habitat Survey Results

A2.1 The distribution of the habitats present within the Site is illustrated on **Plan EDP 1** appended to this Technical Note. This plan also includes reference numbers for field parcels (F1, F2 etc.) and boundary features (B1, B2 etc.) and the habitat descriptions below should be read in conjunction with the plan.

Grassland

A2.2 Brief notes on the grassland habitats within each field parcel are set out below:

- Field F1. An Improved sward apparently dominated by perennial rye-grass (*Lolium perenne*) with much white clover (*Trifolium repens*) and an abundance of creeping buttercup (*Ranunculus repens*);



Figure EDP A2.1: Field F1 – looking north.

- Field F2. The southern half of this field has a relatively steep gradient and the sward here appears to be a relatively fine, but not herb-rich, semi-improved neutral grassland with much crested dog's-tail (*Cynosurus cristatus*) and some ribwort (*Plantago lanceolata*). The remainder of the field appears to be a poor semi-improved sward with less crested dog's

tail and ribwort. Patches of scrub (see **S1**) and two field trees (English oak) are also present here;

- Field F3. A sheep-grazed poor semi-improved grassland dominated by common grass species such as perennial rye-grass (*Lolium perenne*), common bent (*Agrostis capillaris*) and Yorkshire fog (*Holcus lanatus*). Tall herbs such as creeping thistle (*Cirsium arvense*) and docks (*Rumex* spp.) are common. No species of any note were recorded here;
- Field F4. Very similar to field F3 and is a poor semi-improved grassland but with a pond (**P1**) in its centre;
- Field F5. Very similar to the adjacent fields F3 and F4 and is also poor semi-improved grassland. An English oak is present in the north of the field;
- Field F6. Possibly subject to a degree of relatively recent agricultural improvement this field has less species diversity than the fields to its north and is either an Improved pasture or a particularly grass-dominated poor semi-improved sward;



Figure EDP A2.2: Field F6 – looking east.

- Field F7. Similar to field F6 in being apparently dominated by a small number of common grass species and with a poor herb component. Nettle (*Urtica dioica*) is locally abundant in the north-east and west of the field. A derelict and collapsed small barn is present in the west of the field;



Figure EDP A2.3: Field F7 – looking north-east.

- Field F8. Grass-dominated poor semi-improved grassland with a low diversity and low abundance of herbs; grazed short by sheep;



Figure EDP A2.4: Field F8 – looking north-east.



- Field F9. Very similar to Field F8 but with slightly more tall ruderal species such as nettle, creeping thistle and docks. There is a shallow ridge and furrow earthwork feature here;
- Field F10. A small rectangular field with a poor semi-improved sward and a low diversity and abundance of herb species. A dry and broad gully feature is present in the north of this field and supports some scattered scrub (see **S2**) and tall ruderal vegetation;
- Field F11. A tightly grazed poor semi-improved sward with no apparent botanical interest;
- Field F12. This is quite a complex field and also one of the few on the Site with some botanical interest. A broad grass-covered raised trackway runs along the western edge of the field and small patches of scrub (see **S3**) are present on the edges of the trackway. This scattered scrub is also present around a small area of slightly raised ground in the north-east of the field. In lower ground in the north of the field is an area of marshy grassland where sweet-grass (*Glyceria* spp.) appears to be abundant and soft rush (*Juncus effusus*) frequent. It is possible that this lower ground may have been excavated although such an action would appear to have occurred long ago. The remainder of the field has a semi-improved neutral grassland sward although an area of semi-improved acid grassland (with some sheep's sorrel and common cat's-ear (*Hypochaeris radicata*)) is present on the edge of the trackway;



Figure EDP A2.5: Waxcap fungi in Field F12.



Figure EDP A2.6: Marshy grassland in the north of field F12 – looking west.

- Field F13. This is a small paddock with an improved sward and much tall ruderal vegetation which had been cut prior to the survey. In the south of the field is a covered sheep pen comprising a plastic fabric over an arched metal frame whilst on the western edge of the field is a store of silage bales;
- Field F14. A small paddock with a poor semi-improved sward which had been tightly-grazed and heavily-pounded by horses. The south-western end of the paddock was waterlogged at the time of survey; some marsh thistle (*Cirsium palustre*) and cuckoo flower (*Cardamine palustre*) were recorded;



Figure EDP A2.7: Field F14 -looking north-east.

- Field F15. Another small paddock on the south-western edge of the Site had not been grazed for a while and supported the longest sward recorded on the survey Site. This is a poor semi-improved grassland with much crested dog's-tail but nothing else of any apparent note was recorded although small quantities of marsh thistle and soft rush are present in the south-west of the paddock;
- Field F16. One of the larger fields in the southern part of the Site this was grazed short by beef cattle at the time of survey and had an irregular surface. Along the northern edge of the field is a raised grassy trackway with an open line of mature hawthorn (*Crataegus*

monogyna) along the southern edge of the trackway. The western third of the Site also has a variety of shallow landforms suggesting a possible history of small-scale extraction (of sand or gravel). Across the field there are several scattered mature hawthorn bushes. The southern edge of the field drops away steeply and there is much dense bramble which grades into a wooded bank (see **B43**).

The sward appears to be predominantly semi-improved neutral grassland with common cat's-ear and yarrow (*Achillea millefolium*) recorded; populations of waxcaps are present in the west of the field and small populations of sheep's sorrel indicate semi-improved acid grassland in the same area. The eastern quarter of this field is heavily disturbed by livestock pounding and vehicle movements; items of agricultural machinery were present here at the time of survey;



Figure EDP A2.8: Field F16 - looking north.

- Field F17. This small field was divided into two component pastures by an electric tape fence at the time of survey and was grazed by horses. It has a steep easterly aspect and at the top of the field (western side) is an abundance of sheep's sorrel, common cat's-ear and yarrow suggesting a semi-improved acid grassland sward. There is also a small quantity of scrub (see **S5**) in the south-west of the field and several scattered mature hawthorn bushes within the field;

- Field F18. A small narrow pasture with a poor semi-improved sward which had been grazed tight at the time of survey. Some ribwort and white clover were recorded here;
- Field F19. Another small rectangular field which had been grazed tight and which supported a poor semi-improved sward with some yarrow, white clover and ribwort. A small area at the western end of the field was fenced off but had an identical sward to the rest of the field; and



Figure EDP A2.9: Field F19 - looking north-west.

- Field F20. Tightly-grazed by horses, this small field has a poor semi-improved sward with no species of note recorded. There is a very slight and shallow ridge and furrow system in this field.

Hedgerows

A2.3 Brief notes on the hedgerow/boundary habitats are set out below:

- B1. 8m tall and unmanaged, open to grazing on one side but fairly dense in the north; dominated by hawthorn and blackthorn (*Prunus spinosa*);

- B2. A boundary against residential houses this is a mix of relict unmanaged hedgerow with long sections of garden fence and some non-native trees and shrubs;
- B3. The eastern third of this unmanaged boundary is dominated by bramble with sections where no woody vegetation is present. The remainder of the 6m tall hedge has at least three common woody species and a single standard English oak;
- B4. Against private gardens this boundary is mostly fences with a mix of native and non-native trees and shrubs, however, in the north there are several mature broadleaved trees;
- B5. A short section of boundary against a large garden this mostly comprises non-native shrubs which are cut to approximately 4m tall;
- B6. This 4-5m tall hedgerow would appear to be flailed on an infrequent basis and has sheep fencing on both sides. Hawthorn and blackthorn are dominant here but small quantities of other species are present including crack willow (*Salix fragilis*); a field maple (*Acer campestre*) standard is also present;



Figure EDP A2.10: Hedgerow B6 – looking north-west from its easternmost point.

- **B7.** This is a ditch containing a small stream and there are many coppiced white willow (*Salix alba*) along this boundary although other woody species are also present. Bramble is abundant here and there is a sheep fence on the eastern side. This boundary is essentially dense scrub with coppiced willow;



Figure EDP A2.11: Coppiced white willow along boundary B7.

- **B8.** 8m tall this dense hedge has much holly (*Ilex aquifolium*) and bramble but is generally poor with regard to woody species;
- **B9.** This is a continuation of the stream described in boundary **B7** but the stream is shallow here and runs at the foot of a derelict and open hedgerow with several mature English oaks within it. To the west of the stream is a narrow public footpath and to the west of this a sheep fence.;
- **B10.** The Site boundary with the **A51** this is predominantly unmanaged hawthorn 5-6m tall but with numerous semi-mature ash standards;
- **B11.** A thin flailed 4m tall hedgerow dominated by hawthorn; this hedgerow appears to be of relatively recent origin (less than 20 years old);

- **B12.** Unmanaged and 8m tall this is a relatively species-poor hedgerow with much dead English elm (*Ulmus procera*);
- **B13.** Very similar to hedgerow **B12** but in slightly better condition and with a mature ash standard that has high bat roost/owl nest potential;



Figure EDP A2.12: Hedgerow B13 -with ash standard.

- **B14.** Unmanaged and 6-8m tall this hedgerow comprises at least five woody species and bramble; there is also a large ash standard and much dying English elm;
- **B15.** A 4m tall hedgerow which appears to be frequently flailed; mostly hawthorn and blackthorn and with a mature ash standard;
- **B16.** A very fragmentary defunct hedgerow with several mature ash and English oak standards. A rectangular pond (see **P2**) is present on the south-eastern edge of this feature;
- **B17.** This 4m tall hedge appears to be occasionally flailed; of note here is a crab apple (*Malus sylvestris*);
- **B18.** The northern half of this species-poor boundary is a gappy hedgerow mostly comprising hawthorn and bramble whilst the southern half is denser and taller as well as being occasionally trimmed;

- B19. This hedgerow would appear to be occasionally flailed and has sheep fencing on both sides. Hawthorn is dominant but there is also blackthorn, elder, young English oak and hazel;
- B20. The majority of this boundary is a sheep fence with several mature standards and occasional shrubs, however, in the north is a short length of dense hedgerow where holly is dominant;



Figure EDP A2.13: The defunct hedgerow of B20 -looking north.

- B21. The northern part of this boundary comprises a thin hawthorn-dominated hedge that has been cut to a height of approximately 3m whilst the southern part is taller, thicker and contains some holly;
- B22. Unmanaged and 6-7m tall this is quite a dense hedge although relatively poor in woody species diversity;
- B23. This hedge would appear to be flailed on an occasional basis and has much holly within it;



- B24. Mostly sheep fencing but with three large English oaks and small clumps of flailed woody species such as hawthorn and bramble;
- B25. Between 4m and 6m in height this hedgerow would appear to be occasionally flailed; it is poor in woody species diversity and fairly thin;
- B26. A continuation of B25 but denser, taller and less frequently managed;
- B27. A very gappy hedgerow with only a few clumps of flailed hedgerow vegetation and a standard English oak in the north;
- B28. Unmanaged, 6-8m tall, largely of hawthorn and very gappy;
- B29. A very gappy flailed hedgerow 2m in height dominated by hazel;
- B30. Against a house and garden this is an irregular feature with a large gap where fencing predominates. A mix of tall native and non-native shrubs are present here;
- B31. This is a gappy and unmanaged hedge but with a relatively good woody species diversity;
- B32. A tall and unmanaged hedgerow but relatively thin; several large mature standards are present here and there is also a semi-mature weeping willow (*Salix babylonica*);



Figure EDP A2.14: Hedgerow B32.

- **B33.** Against a garden this is a variable hedgerow with some sections cut to a height of 4m and others uncut; native woody species predominate here;
- **B34.** Tall, unmanaged and relatively thin with much holly and several English oak and ash standards;
- **B35.** An unmanaged relatively species-poor hedgerow with very variable height and thickness; some sections are up to 5m tall whilst others are less than 2m high. There are two Lombardy poplar (*Populus nigra Italica*) standards here;
- **B36.** An unmanaged hedgerow with a height varying between 6m and 8m; holly, hawthorn, English elm, bramble and elder are predominant here;
- **B37.** This is a tall unmanaged hedgerow comprising mostly semi-mature coppice stems of sycamore (*Acer pseudoplatanus*) although there is some holly and there are two large ash standards in the west;
- **B38.** A semi-derelict picket fence against a road verge with several semi-mature planted cherries (*Prunus avium*) on the verge;

- **B39.** The two sides of a trackway leading from the public highway to the derelict house this comprises an avenue of common lime (*Tilia x vulgaris*) with some beech (*Fagus sylvatica*) and Scots pine (*Pinus sylvestris*), with non-native shrubs such as cherry laurel (*Prunus laurocerasus*) and some bamboo;



Figure EDP A2.15: Boundary B39 from within field F14.

- **B40.** A thin species-poor hedgerow with some sections cut to a height of 3m and other sections unmanaged. There are two Lombardy poplars and a mature ash standard here;
- **B41.** A recently-planted beech hedge against a garden, managed to a height of 3m with occasional hawthorn, silver birch (*Betula pendula*), holly and bramble;
- **B42.** Mostly a garden fence with much bramble and nettle and with a single semi-mature hawthorn on its eastern side;
- **B43.** An ill-defined boundary comprising a steep bank leading down from Field **F16** to the public highway; bramble is abundant on the northern edge of this boundary but most of the bank comprises mature and semi-mature broadleaved trees and shrubs. English oak, common gorse (*Ulex europaea*), elder, blackthorn, hawthorn, silver birch, sycamore, holly and some Scots pine are present here. This feature is also described as woodland **W2**;



- B44. Against gardens this is mostly a complex of fences and walls with some sections of hedgerow and sections of non-native woody species. Silver birch, holly and hawthorn are the most frequently recorded native species here;
- B45. A defunct unmanaged hedgerow with sheep fencing dominated by mature English oak standards in the south. The majority of the hedgerow averages 10m in height and comprises hawthorn, holly, bramble, ash and elder;
- B46. A single ash standard is present in this thin, tall and unmanaged hedgerow where there is also English oak, hawthorn, elder and bramble;
- B47. Forming the northern boundary of field **F18** this is a short section of defunct unmanaged hedgerow and mostly comprising holly and hawthorn;
- B48. This is a tall thin unmanaged hedgerow comprising hawthorn, holly, hazel and some sycamore;
- B49. Another tall, thin, gappy and unmanaged hedgerow; this is dominated by hawthorn but also contains occasional semi-mature English oaks; and
- B50. Four mature English oak standards are present here and the hedgerow is relatively dense in places as it is well-fenced although some sections are notably thinner; holly and hawthorn appear to be the predominant woody species.

Scrub

A2.4 Brief notes on the scrub habitats are set out below:

- **S1**. This area of scrub comprises two strips of woody vegetation in the south-west of field **F2** which may represent remnant hedgerows. Hawthorn, holly, hazel and field maple are predominant here. Livestock can freely access this scrub and there is thus a relatively poor understorey and little regeneration of woody species;



Figure EDP A2.16: Part of S1 on the right with the edge of woodland W1 on the left.

- **S2**. Situated on the boundary between fields **F9** and **F10** in the centre of the Site this occupies a broad dry gully feature with much nettle and foxglove (*Digitalis purpurea*). As well as two mature English oaks, scattered mature hawthorn, sycamore and elder are present in the west whilst a denser structure is present to the east where these species are augmented by holly, hazel, and bramble. As livestock freely access this scrub there is little regeneration of woody species and a species-poor field layer;

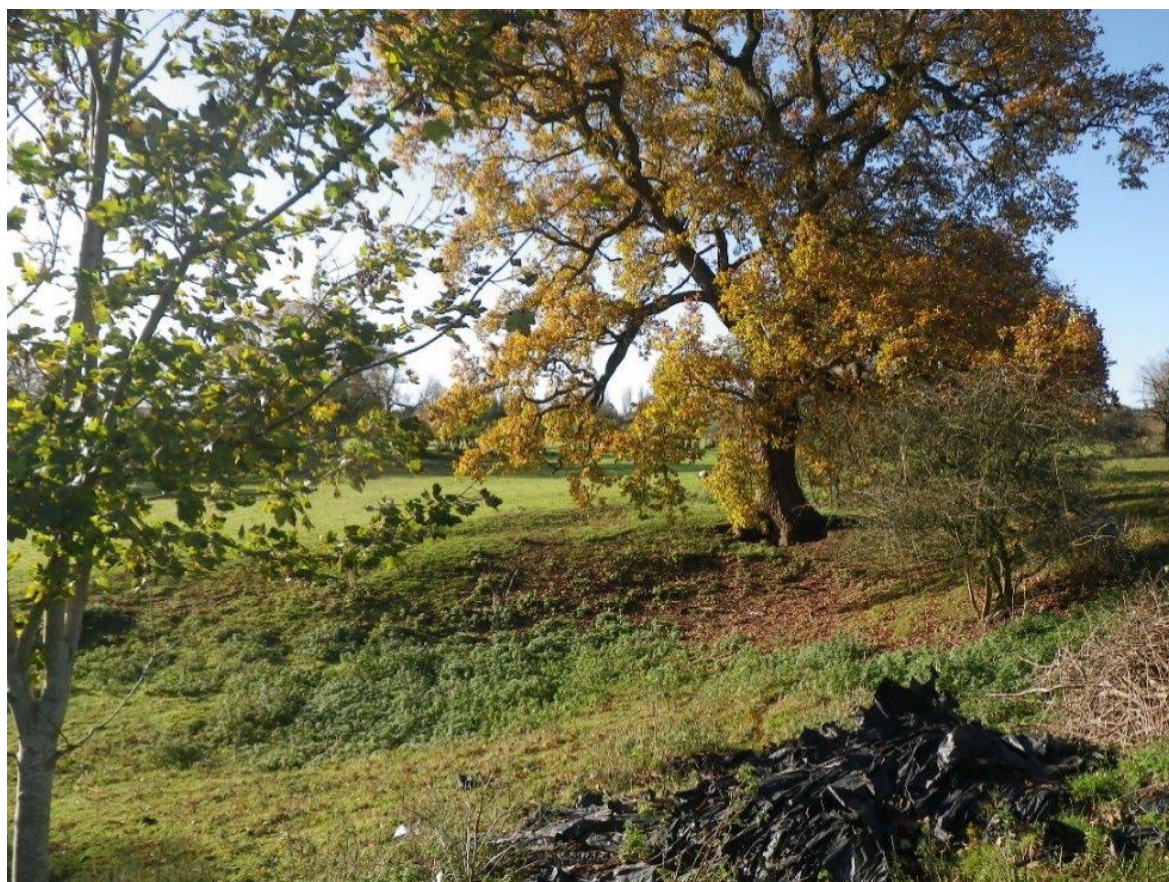


Figure EDP A2.17: S2 – looking west.

- S3. Along the edges of slightly elevated ground in field **F12** there are patches of scrub where common gorse and hawthorn are predominant with some hawthorn and silver birch;
- S4. A line of mature hawthorn, possibly representing a former hedge line. There is no distinctive field layer here and no regeneration of woody species due to livestock browsing;



Figure EDP A2.18: S4 in the centre of the photograph leading away to the south-east.

- S5. A narrow band of holly, bramble, hazel and hawthorn in field **F17** with much nettle and foxglove; and
- S6. This is an area of old and unmanaged crack willow (*Salix fragilis*) with some hawthorn, ash, and bramble. Tall herbs such as nettle are common in the species-poor field layer although there are small areas of semi-improved neutral grassland where yarrow and common cat's-ear are present.

Woodland

A2.5 Brief notes on the woodland habitats are set out below:

- W1. A narrow strip of fenced broadleaved woodland with much bramble scrub and tall ruderal vegetation on its northern and north-eastern edges, this is centred on a deep valley of a small south-flowing stream. Mature English oak standards are frequent here, but there are also semi-mature ash. Holly, hazel, field maple, hawthorn, blackthorn, elder, sycamore, and dog rose (*Rosa canina agg.*) are also present in varying quantity. Nettle is abundant on the edges of the woodland; and

- **W2**. This is a narrow section of steep wooded bank on the southern edge of field **F16**; it is synonymous with boundary **B43** as it is not clear where the boundary lies. As such this description is essentially that of boundary **B43**. Bramble is abundant on the northern edge of this feature but most of the bank comprises mature and semi-mature broadleaved trees and shrubs. English oak, common gorse, elder, blackthorn, hawthorn, silver birch, sycamore, holly and Scots pine are present here.

Ponds

- A2.6 The two ponds in the north-west of the Site (**P1** in field **F4** and **P2** in the north of field **F6**) demonstrated no aquatic, riparian or marginal vegetation at the time of survey; only a small quantity of sweet-grass (*Glyceria spp*) in **P1**. Both ponds were surrounded by a ring of scrub – English oak, hawthorn, holly, grey willow (*Salix cinerea*), hazel, bramble etc. Stock could access Pond **P1** but pond **P2** was more securely fenced.



Figure EDP A2.19: Pond P1.

Abandoned Buildings and Smallholding

- A2.7 On the south-western edge of the Site is a small but complex area dominated by a large, abandoned house with associated outbuildings and an abandoned cottage which now serves as a stable. A small, abandoned apple (*Malus domestica*) orchard is present to the north-east and south-east of the cottage and this has a dense understorey of nettle.
- A2.8 There is a brick-built walled garden in the south of this complex and this supports scattered scrub (bramble, hawthorn, elder and dog rose) with much tall ruderal vegetation and common grass species.
- A2.9 The grounds of the house have largely become an area of dense scrub comprising a mosaic of native and non-native trees and shrubs. There is also a small area south of the house where a mobile home is located and which appears to be actively used. A recently-planted beech hedge is present on the southern side of the mobile home.
- A2.10 No native plant species of any note were recorded in this area.

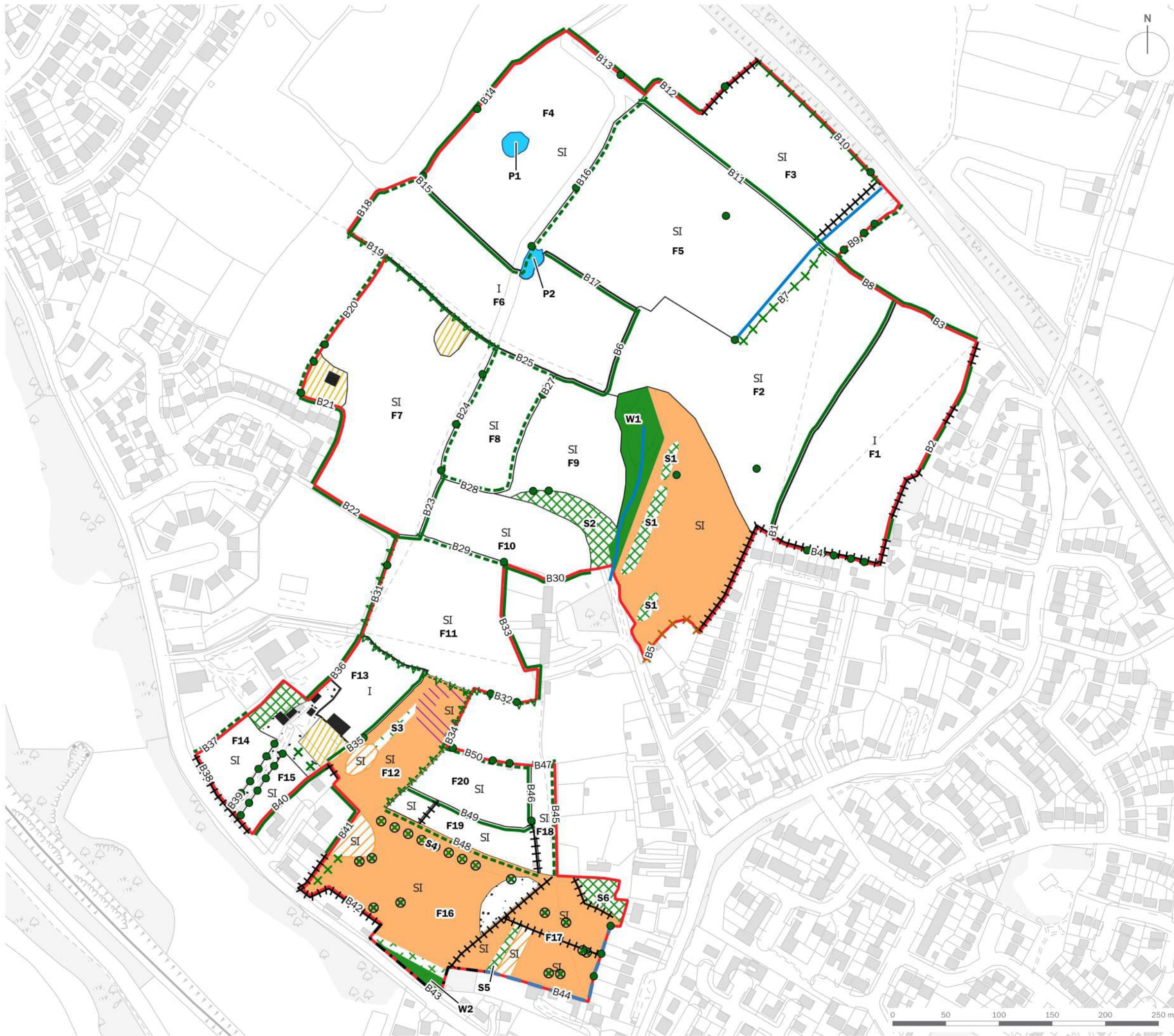


Figure EDP A2.20: The abandoned house (south-eastern elevation).

Little Haywood, Staffordshire
Ecology Technical Note November 2022
edp5977_r005a



Plan EDP 1
Phase 1 Habitat Plan
(edp5977 d010 05 December 2022 MCa/TWi)



- Site Boundary
- Broadleaved Semi-natural Woodland
- Dense Continuous Scrub
- Scattered Scrub
- Tall Ruderal
- Improved Grassland
- Semi-improved Acid Grassland
- Semi-improved Neutral Grassland
- Poor Semi-improved Grassland
- Marsh/Marshy Grassland
- Standing Water
- Building
- Bare Ground
- Intact Species-rich Hedgerow
- Intact Species-poor Hedgerow and Trees
- Intact Species-poor Hedgerow
- Defunct Species-rich Hedgerow
- Defunct Species-poor Hedgerow
- Scattered Trees/Parkland (Broadleaved)
- Scattered Scrub
- Running Water
- Fence
- Introduced Shrub
- Scattered Mature Hawthorn
- Steep Bank
- Fence/Wall/Hedgerow Combination

client
Bellway South Midlands

project title
Little Haywood, Staffordshire

drawing title
Phase 1 Habitat Plan

date	05 DECEMBER 2022	drawn by	MCa
drawing number	edp5977_d010	checked	TWI
scale	1:3,500 @ A3	QA	RBa



Meecebrook

Review of new passenger station proposals

5th December 2022

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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:

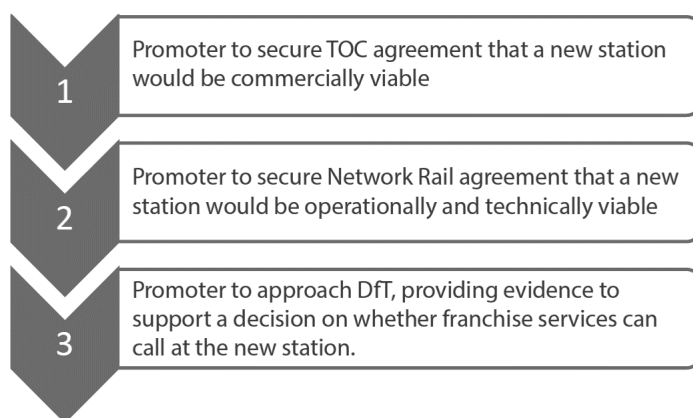
⁴ Pages 3-4

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>

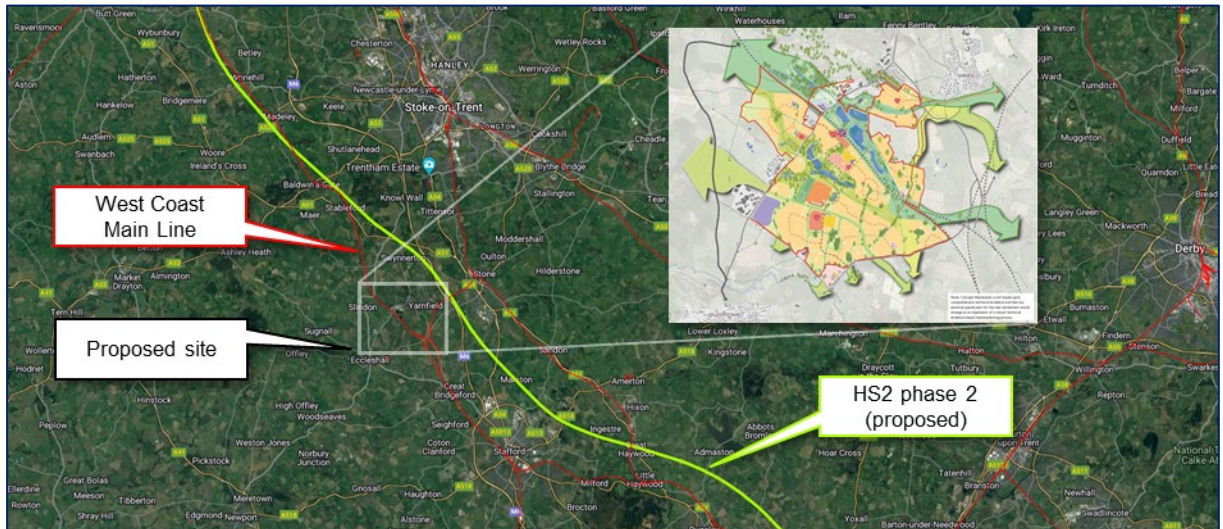
¹⁶ <https://governance.wmca.org.uk/documents/s5126/Report.pdf>

3 The proposed site

3.1 Location

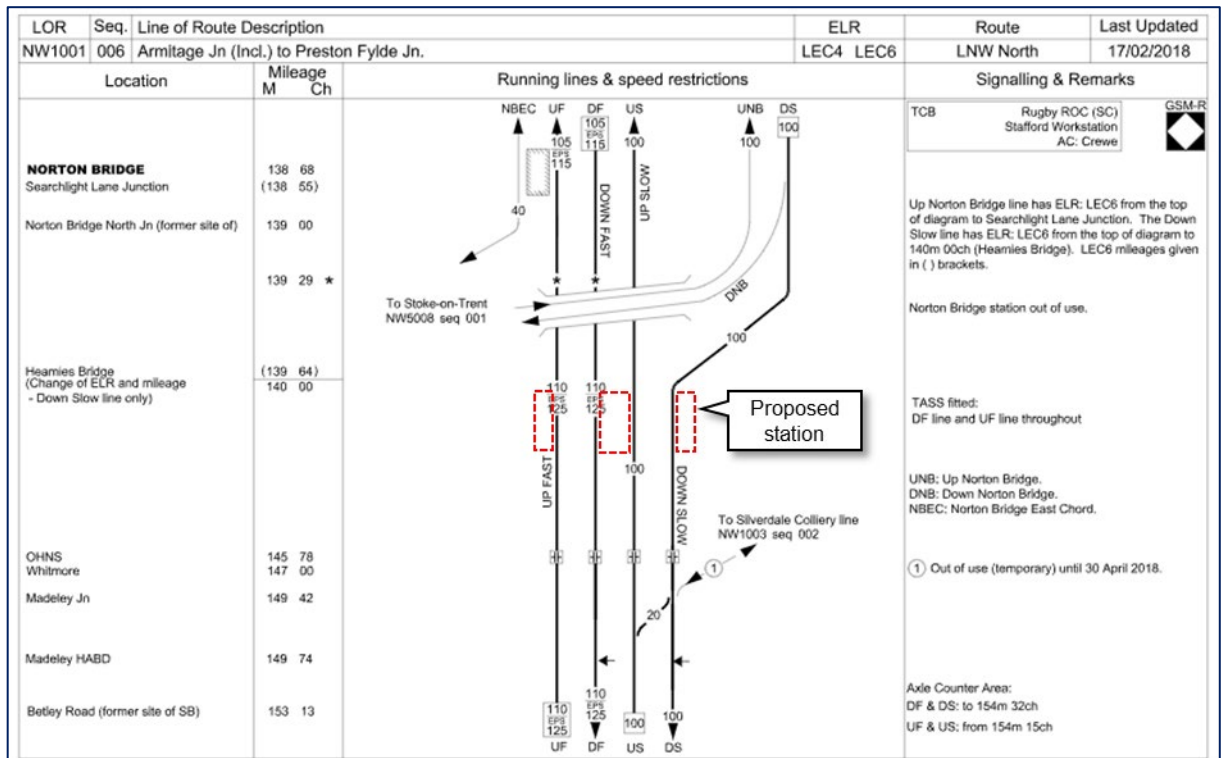
3.1.1 The location of the site relative to the West Coast Main Line (WCML) is shown in the Figure below:

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

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, [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".

Intermodality



Original documents printed on FSC certified Mixed Sources paper from well-managed forests and other controlled sources.

From: Webb, Josh [REDACTED]
Sent: 12 December 2022 11:52
To: Strategic Planning Consultations
Cc: [REDACTED]
Subject: Stafford Borough Local Plan - Preferred Options Consultation
Attachments: Preferred-Options-Consultation-Response-Form (WSP on behalf of Seddon Homes).pdf

Dear Sir / Madam

Please find attached a completed consultation form for the purposes of making representations to the Stafford Borough Local Plan 2020-2040 Preferred Options consultation, on behalf of Seddon Homes.

I would be grateful if you could please confirm receipt of the attached at your earliest convenience.

Kind regards
Josh

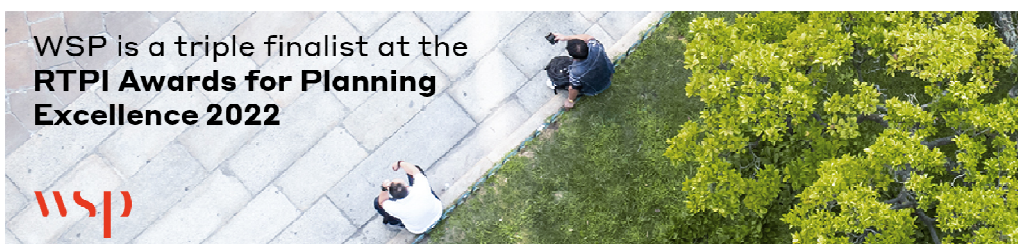


Joshua Webb



wsp.com

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-LAEmHhHzdJzBITWfa4Hgs7pbKI

Contact Details

Full name (required): Joshua Webb

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~~

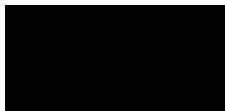
Organisation or Company Name (if applicable): WSP on behalf of Seddon Homes

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:

Seddon support the proposed housing requirement of 535 new dwellings per year, higher than the minimum figure set by the standard method of 391. Identifying a realistic but high growth scenario, based on jobs-based housing projections is important in providing appropriate opportunities for housing across the plan period.

Seddon welcome the spatial distribution of new housing as shown in Policy 1, weighted towards Stafford Town as the most appropriate location for growth and housing delivery, as well as the proposed allocation at Ashflats (ref STAFMB03) under Policy 12.

It is essential especially in boroughs where large-scale strategic allocations are proposed that a range of alternative sites are identified for development.

Large sites such as Meecebrook, North of Stafford and West of Stafford require major infrastructure works to be undertaken and constraints to overcome before housing can be delivered. Such constraints can have a major impact on delivery and create uncertainties in viability terms. There are many examples around the country where garden communities have taken significantly longer than expected to start delivering houses. In the short term, this can impact the five-year deliverable supply of housing. Choice and flexibility are therefore required in terms of the size and location of allocated sites to provide sufficient certainty that the housing requirement will be met.

Proposed allocation STAFMB03 has no technical constraints to development and can deliver housing early in the plan period. This is set out 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:

Seddon endorse the Council's desire to focus the development of new housing towards Stafford Town and understands it is the most appropriate and sustainable location for growth. Whilst the Ashflats site (STAFMB03) is currently located outside of the current settlement boundary, it is well connected to the existing built-up area of Stafford and was identified as a sustainable location in the Inspectors Report for the Local Plan Part Two:

“The site, to the south-west of Stafford’s urban area, has the potential to yield around 320 new homes. It is located beyond the settlement boundary, and it is contained by the M6 motorway, the Stafford to Birmingham railway and the A449 main road. It is sustainably located, subject to appropriate mitigation from the significant noise impacts of both the two highways (especially the M6) and the railway. It is my view, however, that the strategic housing requirements of PSB1 can be provided satisfactorily without recourse to developing new homes on this site. I therefore consider that the site is not needed now, and for this reason the settlement boundary does not need to be changed.”

It is a logical extension to Stafford Town with defensible boundaries on all sides and now that a need exists to bring the site forward, there is a logical reason for the settlement boundary to be adjusted to include the site.

Policy 3. Development in the open countryside - general principles

Yes / No

Policy 3 Comments:

Seddon has no comments on draft Policy 3 at the current time.

Policy 4. Climate change development requirements

Yes / No

Policy 4 Comments:

Seddon supports the Council's commitment to address potential climate change implications, which includes reducing carbon emissions associated with the construction and operation of developments, however, has concerns around the implementation of the policy.

As with any Seddon Homes scheme, the delivery of the Ashflats site (STAFMB03) will have a core focus on the principles of sustainable design throughout the construction and operation of the site. Minimizing energy use is a theme at the centre of all Seddon schemes.

Seddon is however concerned with the practicalities of achieving some of the requirements of Policy 4. It is still not fully understood within the housebuilding industry how the move to net zero operational energy will impact on build cost and design approach. Furthermore, it is likely that standards will be revised over time, and as data becomes available.

It is therefore crucial that Policy 4 includes a robust viability clause which provides flexibility to relax the policy requirements where it can be demonstrated that the requirements would render development unviable through submission of a robust site-specific Financial Viability Assessment at the application stage. This is crucial to provide the requisite flexibility to prevent development from stalling due to viability constraints. It is also crucial that Policy 4 includes flexibility to adapt to new standards as they become available and the housebuilding industry learns how to best achieve net zero in its developments.

Similar concerns are raised with the proposed requirement to meet at least the on-site energy demand through on-site renewable energy generation. To make this policy consistent with paragraph 16. d. of the NPPF, and to address Seddon's concerns about the policies contained within Policy 4 set out above, clearer wording needs to be introduced in relation to flexibility for viability.

Seddon may wish to provide further comments to draft Policy 4 during the Local Plan production process as technical considerations of the implications of these requirements develop.

Policy 5. Green Belt

Yes / No

Policy 5 Comments

Seddon has no comments on draft Policy 5 at the current time.

Policy 6. Neighbourhood plans

Yes / No

Policy 6 Comments:

Seddon has no comments on draft Policy 6 at the current time.

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:

Seddon has no comments on draft Policies 7 or 8 at the current time.

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:

Seddon has no comments on draft Policy 9 at the current time.

Policy 10. West of Stafford

Yes / No

Policy 10 Comments:

Seddon has no comments on draft Policy 10 at the current time.

Policy 11. Stafford Station Gateway

Yes / No

Policy 11 Comments:

Seddon has no comments on draft Policy 11 at the current time.

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:

Seddon is supportive of the Council's acknowledgement that allocating 'other' housing sites under draft Policy 12 is critical to maintain a sufficient five-year supply across the borough throughout the plan period. These representations are submitted as part of the continued promotion of Land at Ashflats (STAFMB03) which is allocated under this policy and deemed available and deliverable in line with the settlement hierarchy. Seddon strongly supports the allocation of this site, however, makes the following comments and enclose a Site Location Plan showing the full extent of the site area to be allocated.

Why Land at Ashflats is needed now

The site is a logical extension to Stafford Town, being immediately adjacent to the current settlement boundary, and will be a key contributor to the overall housing targets set by the Council, as well as the growth aspirations for Stafford Town. It provides an excellent opportunity to widen housing choice in the Town and across the Borough. It is well contained due to existing development to the north (residential) and east (commercial) and the presence of the M6, Stafford to Birmingham railway and the A449 main road. The fact the site is well contained with strong physical boundaries, means that its development would not result in urban sprawl across the open countryside. This is a significant benefit of developing this site as opposed to other areas surrounding Stafford which are not as well contained; further details on the deliverability of this site are set out below.

Whilst it is the Council's intention that Meecebrook Garden Village and other large strategic development sites are a key instrument for delivering housing over the plan period, there are risks associated with relying on the delivery of such larger strategic sites. There are often uncertainties associated with the deliverability and developability of such large new settlements in both timescales, funding and supporting infrastructure, which often take longer to come forward than anticipated. Therefore, potentially delaying the overall delivery of housing.

Progressing with a new Garden Community growth option should not be at the expense of the development and growth of the rest of the Borough. For the reasons set out above, it is important that a range of sites are allocated, particularly those, such as land at Ashflats, that are able to come forward in the short term and start delivering housing, whilst the complexities of bringing forward larger strategic sites are being worked through. Stafford Town should continue to be the focus for future development in order to continue fulfilling its role as a regionally significant service centre and Tier 1 settlement. The new Garden Community should not reduce the amount of housing directed towards Stafford, which would compromise the Town meeting its growth aspirations as envisaged by the Council.

It is vital that the Council recognize the importance of those sites allocated under Policy 12 as critical to their ambitions of delivering 10,700 new homes over the plan period. An over reliance on large strategic sites could see the Council fall short of their admittedly 'ambitious' housing target should those sites allocated under Policy 12 not be delivered. Maintaining a strong supply of deliverable housing numbers in key settlements through Policy 12 is therefore vitally important and necessary if the Plan is to accord with national policy.

Suitable and sustainable sites, such as Ashflats, that are able to come forward in the short term, should be encouraged and supported. In terms of timescales, the Council do not consider Ashflats to start delivering housing until 2028/2029, as per the Lead-in Times and Build Rate Assumptions Topic Paper.

This Topic Paper assumes there is a 4-year lead in time attributed to the site, assuming an outline permission will be pursued. In this case, it is Seddon's ambition to pursue a full planning application, therefore, reducing the lead in time to 2-years.

Seddon would start work on site as soon as permission was granted. Considering the size of the site, the infrastructure requirements, primarily delivery of the new access through Lawford House, Seddon would assume a delivery rate of 40dpa. The delivery programme provided by Seddon for the site is summarised in the table below. This confirms the site can deliver prior to the dates assumed by the Council in the housing trajectory.

Seddon request the Council updates its housing trajectory accordingly.

Milestone	Date
Submission of updated development framework	Spring 2023
Local Plan Publication	July to September 2023
Local Plan Submission	November 2023
Full application submission	November 2023
Local Plan Examination	February 2024
Planning permission granted	February 2024
Start on site	May 2024
Local Plan Adoption	October 2024
First dwelling completion	February 2025
Last dwelling completion	December 2031

Seddon have a strong track record of ensuring sites such as this are delivered and their approach in this instance (through a full application rather than outline) will ensure this delivery is expedited.

Land at Ashflats can come forward prior to the Council's expected delivery rate and offers the opportunity to help reinforce the Council's housing land supply position at an early stage in the Plan period, whilst larger strategic sites are taking time to come forward. The delivery assumptions for this site therefore need to be updated in the Local Plan housing trajectory to reflect the potential for early housing delivery from this site.

Extent of Ashflats Allocation and Quantum of Development

Whilst the extent of the site boundary of the Ashflats site in Appendix 2 and on the Draft Proposals Map does cover a large proportion of the site, there are some key parts of the site which need to be included within the allocation. For ease, a Site Location Plan is included with these representations which clearly shows the full extent of the Ashflats site. It is appreciated that it is not possible for the Council to allocate land outside of its administrative boundary, however, the full extent of the Ashflats site as shown on the enclosed Site Location Plan, up to the Stafford Borough boundary, should form part of the allocation. Key changes to be made to the extent of the allocated area for Ashflats are:

- Inclusion of Lawford House along the eastern boundary – Seddon has recently purchased this property and intends to demolish Lawford House as part of the development of the site to provide access into the site.
- Inclusion of the flood zone area – whilst it is appreciated that it is unlikely residential development would occur in this location (unless there were changes to the extent of these zones and/or the Sequential and Exceptions Test were passed), this area does provide an opportunity for landscaping and ecological enhancements, therefore, should be included in the site boundary of the allocation as it is likely to form part of the scheme.
- Likewise, although the part of the site that falls within the neighbouring borough of South Staffordshire is unlikely to be developed for housing, it will form an important part of the scheme for ecological/landscaping purposes.

In terms of quantum of development, STAFMB03 is proposed to be allocated with a potential yield of 268 dwellings. This is based on a site area of 12.76 hectares and using the Council's assumptions in the SHELAA 2022 Update that 60% of a site greater than 4ha is deliverable and applying a standard rate of 35 dwellings per hectare for sites immediately on the edge of Stafford.

However, a significant amount of technical work has been carried out on the site to demonstrate that 320 dwellings is appropriate.

The Inspector in his consideration of appeal APP/Y3425/A/14/2217578 noted that no evidence had been presented to demonstrate that the site could not accommodate 320 dwellings and that the reserved matters process provides adequate provision to assess this and ensure acceptable design standards were met. The appeal site measured 13.8ha and included land at Lawford House and also land further south beyond the Stafford Borough boundary. The proposed

delivery of 320 dwellings at the site was also informed and underpinned by a robust evidence base associated with the appeal, demonstrating that the site, taking account of its opportunities and constraints could suitably accommodate 320 dwellings.

The SHELAA (2022) that forms part of the evidence base for this Local Plan examination estimates the site has capacity to deliver 314 dwellings, on a site size of 14.9 hectares. Again, this assessment makes use of land outside of the SBC boundary although as per the previous appeal (and draft plans for the site) no housing would be delivered on this parcel of land.

There is clear evidence to suggest the site has potential to accommodate a higher potential yield than the 268 dwellings identified in the plan. The potential yield has been calculated using a smaller site area (12.76ha) than the previous appeal and site assessment, without regard for the fact that all housing proposed was to be delivered on this parcel of land. Seddon request that Policy 12 is updated to reflect that Land at Ashflats (STAFMB03) can deliver 320 dwellings.

Further details are provided below demonstrating the deliverability of the site.

Availability

The Ashflats site (STAFMB03) is available now and is actively being promoted for development. Lawford House is also now owned by Seddon and proposed access is to be provided through its demolition.

Suitability

As set out above, the site is ideally located to provide a logical extension to Stafford Town, which is identified as the Borough's Tier 1 Settlement and the key area for future growth. It is immediately adjacent to the existing settlement boundary and a well-established residential area and is a contained site with strong boundaries, which once developed wouldn't lead to urban sprawl.

The suitability of the site has already been assessed through both a Local Plan Examination and a Planning Appeal. The site has not previously progressed as an allocation or been granted planning permission for housing due to a matter of timing, as opposed to there being any technical constraints that would restrict its development.

By way of summary, an outline planning application with all matters reserved except for means of access for up to 320 dwellings (ref: 13/19524/OUT) was refused in 2014. The reason for refusal was on the basis that the proposed development is on greenfield land outside the residential development boundary of Stafford and given there was a sufficient supply of housing was contrary to the development plan. An appeal was lodged (APP/Y3425/A/14/2217578) and subsequently dismissed in December 2014 for similar reasons.

In dismissing the appeal, the Inspector concluded that although geographically the site was located within the countryside, it was acknowledged *"the M6 and the railway are in themselves dominating linear features that sharply define the whole*

of the appeal site by forming significant boundaries between it and the largely rural area beyond” (paragraph 18 of the Appeal Decision). This reinforces the fact that whilst the site is currently outside of the settlement boundaries, it should not be considered “rural” in character. On the basis that the site is proposed to be allocated for housing, the settlement boundary of Stafford Town should be updated to include the allocation at Ashflats. It is unclear from the Draft Proposals Map if the intention is to extend the settlement boundary to include the Ashflats site, however, Seddon request that the settlement boundary is extended to include Ashflats to avoid any confusion.

Technical Considerations

It is acknowledged that a small part of the site is located within the flood zone, however, this is situated in the southernmost part of the site and applying the sequential approach to the location of development still leaves the majority of the site available for development. This is not and previously was not a constraint preventing the development of the site. It is a matter that can be easily mitigated.

In terms of access, the site-specific requirements of STAFMB03 require proposed access to be provided by the demolition of Lawford House the potential provision of a priority junction. This was deemed an acceptable access arrangement by the Inspector and highways authority as part of the previous application and subsequent appeal: *“Both the appellant’s highways expert and the equivalent representative of SCC explained that relevant criteria for the circumstance of the highway are met and that their judgement is (with the measures proposed to reinforce the tendency of northbound traffic approaching the bridge to slow down) the proposed junction would operate safely and efficiently”*. Lawford House is under Seddon ownership and proposed access would be taken from this point, in line with the site-specific requirement and the previously acceptable method.

Furthermore, the Inspector concludes that there is no evidence to suggest that any special character features (for example important open spaces and views, heritage assets etc) would be adversely impacted upon by the proposed development. The Inspector concluded that whilst a range of objections had been raised by third parties, it was clear from the Council Officer’s Report and the Planning Statement of Common Ground *“there are no ‘technical’ objections from relevant consultees”*.

Whilst the survey information carried out to support the application and appeal will need to be updated, the suite of documents available do demonstrate the suitability of the site for residential development and evidence that there are no technical constraints present that would prevent or even delay the delivery of housing at the site.

The site was also promoted through the Local Plan Part Two examination process. However, the Local Plan Inspector concluded that he was satisfied that the level of flexibility already provided for by sites within settlement boundaries to meet housing needs was appropriate for the effectiveness of the plan. As a result, the Local Plan Part Two did not make any specific allocations for additional housing sites.

Notwithstanding this, the Local Plan Inspector did provide comments on some of the individual sites being promoted. With regards to the Ash Flats site specifically, the Local Plan Inspector noted:

“The site, to the south-west of Stafford’s urban area, has the potential to yield around 320 new homes. It is located beyond the settlement boundary, and it is contained by the M6 motorway, the Stafford to Birmingham railway and the A449 main road. It is sustainably located, subject to appropriate mitigation from the significant noise impacts of both the two highways (especially the M6) and the railway. It is my view, however, that the strategic housing requirements of PSB1 can be provided satisfactorily without recourse to developing new homes on this site. I therefore consider that the site is not needed now, and for this reason the settlement boundary does not need to be changed.”

The Local Plan Inspector echoes the comments from the Inspector determining the appeal in that the site is sustainable and suitably located to accommodate housing. The Local Plan Inspector notes this is subject to mitigation from noise impacts, however, based on the fact noise was not an issue raised as part of the application and appeal at the site demonstrates it can be suitably mitigated and is not a constraint that would prevent development from coming forward.

The site can therefore be clearly deemed a suitable and deliverable allocation.

Achievability

There are no site-specific reasons for the site not being able to deliver housing in the short term.

The site is also of a sufficient size to be able to deliver a wide range of different housing types, sizes and tenures to meet the different needs of the local community.

It has been proven that the site has the capacity to deliver 320 units. The site should therefore be deemed deliverable for a higher number of units than the existing potential yield of 268 dwellings.

Based on the above, it is clear that the site is sustainable and suitable and able to deliver a wide range of housing within the short term. Therefore, it should be maintained as a future housing allocation within the new Local Plan with an uplifted potential yield and site area.

Site Specific Requirements (Appendix 2)

With regards to the essential site-specific requirements set out in Appendix 2, Seddon make the following comments:

Contributions to a bus service would be required

Any contribution needs to be justified and underpinned by evidence to demonstrate it meets the CIL tests set out in the NPPF (paragraph 57) of being necessary, directly related and fairly and reasonably related in scale and kind.

Full ecological surveys of grassland area on site should be carried out, along with any required mitigation as a result

Updated ecological surveys will be carried out across the site during the appropriate survey season and recommended mitigation incorporated into the development proposals as appropriate.

Create an area of habitat to allow for continued habitat connectivity

Retain woodland, in-field trees and hedgerow

Retain views east to Cannock Chase

Provide landscape buffers to east and west to mitigate against M6 and rail line

Focus development to north adjacent to existing settlement

Whilst the Illustrative Masterplan in the Development Framework (Figure 6.2) is only indicative, it does show how a scheme could be delivered to accord with the above. The Illustrative Masterplan shows substantial green infrastructure and linkages across the site to ensure habitat connectivity. Strong landscape buffers are provided along the site boundaries, with the majority of development located in the northern and central parts of the site.

In terms of tree retention, whilst the Illustrative Masterplan does show how trees can be retained, in some instance it might not be possible to retain all existing trees, therefore, policy should be amended to reflect this and enable removal and replanting if retention is not an option.

Access

As set out above, Seddon do now own Lawford House, therefore, have the ability to demolish this property to create the access point into the site.

In summary, for the reasons set out above, land at Ashflats should continue to be identified as a housing allocation as the new Local Plan progresses, albeit with the amendments made to site area and proposed development yield.

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:

Seddon has no comments on draft policies 13 to 22 at the current time.

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

Yes / No

Policy 14 Comments:

Seddon has no comments on draft policies 13 to 22 at the current time.

Policy 15. Stone Countryside Enhancement Area

Yes / No

Policy 15 Comments:

Seddon has no comments on draft policies 13 to 22 at the current time.

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:

Seddon has no comments on draft policies 13 to 22 at the current time.
--

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:

Seddon has no comments on draft policies 13 to 22 at the current time.

Housing Policies

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

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:

Seddon support the acknowledgement in draft Policy 23 that the provision and proportion of affordable housing required as part of new developments varies across the borough. This mechanism allows affordable housing delivery to focus on those areas with the greatest need, resulting in more realised socio-economic benefits from housing delivery in the borough.

As per the Viability Assessment Report in the Council's evidence base, the recommended affordable housing rates on greenfield sites in low value areas are viable when CIL is set at £0 psm and net zero requirements (costs) are accounted for. At this stage, it is understood that the Council is not intending to adopt CIL and Seddon agree with this stance as adopting CIL would have a negative impact on scheme viability and hinder the delivery of affordable housing. However, draft policy 23 should still enable scheme viability to be taken into account when determining the level of affordable housing to be provided as part of new developments. There needs to be the ability for site specific constraints and abnormalities and overall economic and market conditions to be considered to ensure that housing schemes remain viable and are able to come forward and start delivering much needed housing.

Part B of draft policy 23 requires affordable housing to be provided on-site, noting that a commuted sum will only be accepted in exceptional circumstances where it is demonstrated that neither on-site nor off-site provision of affordable housing is feasible or viable. Whilst the flexibility of how affordable housing is delivered is supported by Seddon, the trigger for when a financial contribution will be accepted is more onerous than national policy. The NPPF (paragraph 63) notes that there is only an expectation that affordable housing should be provided on-site and that where it can be robustly justified an off-site provision or financial contribution will be accepted. Therefore, to be consistent with national policy, draft policy 23 should allow the same flexibility.

With regards to the inclusion in the draft policy of a proposed tenure mix, given the lifetime of the plan it is important that there is sufficient flexibility within the policy for an alternative tenure mix to be provided which is more appropriate to meeting local needs at the time developments are coming forward.

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:

Seddon has no comments on draft Policy 30 at the current time.

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, 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:

With regard to Policy 24 (Homes for Life), Seddon endorse Building Regulations and NDSS guidance proposed for adoption by the Council. Seddon Homes deliver schemes in accordance with these guidelines and support the provision of external amenity space in creating attractive places to live.

Seddon support the principle that new housing should contribute to a range of house types as set out in Policy 31 (Housing Mix and Density). The capacity for larger sites to accommodate a mix of dwelling sizes within the sites is important in ensuring housing needs are met in the plan period. Housing mix and density should be a consideration on a site-specific basis and the circumstances set out in Part C of the policy are welcomed in considering the physical and technical constraints of delivering sites such as Land at Ashflats (STAFMB03). In this location, graduating densities in relation to site surrounds (existing development, open space etc,) will be important. Where higher densities can be suitably accommodated in line with these criteria, this should be encouraged.

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:

The importance of delivering developments to a high design standard as set out in the design chapter is endorsed by Seddon. The policies recognise that where good design principles can be applied and demonstrated then development should be forthcoming. However, policies should be sufficiently flexible in order for site specific characteristics, opportunities and constraints to be considered as these will all influence the overall design and landscaping of development schemes.

Whilst the Illustrative Masterplan provided in the Development Framework (Figure 6.2) is only indicative, it does demonstrate how the Ashflats site could be developed, with the provision of strong landscaped boundaries and provision of substantial ecological and landscaping enhancements in the southern part of the site which connect to a wider network of green infrastructure throughout the site.

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:

Whilst the Illustrative Masterplan provided in the Development Framework (Figure 6.2) is only indicative, it does demonstrate how the Ashflats site could be developed with the provision of strong landscaped boundaries and provision of substantial ecological and landscaping enhancements in the southern part of the site which connect to a wider network of green infrastructure throughout the site, to assist in aiming for a net gain in biodiversity.

Seddon wish to make comments on Policy 47 Biodiversity, specifically Section E Sites of Special Scientific Interest. 'In combination' impacts are usually only assessed in relation to Natura 2000 sites. It is unusual for policy to request assessment of the impacts of numerous developed sites in combination on SSSI sites. Seddon request that the council justifies this approach.

Seddon have employed specialists to review their masterplan in November 2022 in line with 10% BNG and have confirmed this can be achieved on site

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:

Seddon has no comments on draft policies 52 and 53 at the current time.

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:

Seddon has no comments on the evidence base at the current time.

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:

Seddon has no comments on the evidence base at the current time.

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.

Seddon has no further comments to make at the current time.

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.

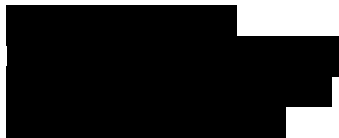
From: Gerald Willard [REDACTED]
Sent: 11 December 2022 12:28
To: SPP Consultations; forwardplanningconsultations
Cc: [REDACTED]
Subject: Re: Local Plan 2020-2040 Preferred Options - Consultation
Attachments: 2022 Poptions submission letter.pdf; MILFORD Preferred-Options-Consultation-Response-Form.pdf

Hello.

Please find the attached LP consultation response.

Gez Willard

Gez Willard





Forward Planning,
Stafford Borough Council,
Civic Centre,
Riverside,
Stafford,
ST16 3AQ

forwardplanningconsultations@staffordbc.gov.uk

SPPconsultations@staffordbc.gov.uk

11th December 2022

Dear Sir/madam

Re: Local Plan 2020-2040 Preferred Options - Consultation

Please find attached completed Preferred Options Consultation Form. This is submitted on behalf of a client who lives in Milford.

Yours Sincerely

Gez Willard.

M.R.T.P.I Chartered Town and Country Planner

[Redacted signature block]

Contact Details

Full name (required): Gez Willard for Willardwillard Ltd as agent

Email (required): 

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

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

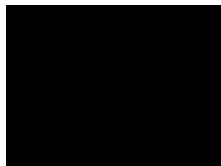
Organisation or Company Name (if applicable): Willardwillard Ltd

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) **Preferences highlighted in bold.**

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:

6. This is not agreed if the proposed boundary in this draft plan for Milford remains unchanged. This settlement boundary for Milford and point 6 would allow windfall infill development which would lead to significant and damaging change in the character and rural nature of Milford. Milford is a small village with limited services within it for local people. To allow additional windfall development within it would strain local services and infrastructure and be alien to the form and nature of this special part of the Borough.

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:

D is not agreed. Milford is identified as a tier 5 village. It is considered that it is not appropriate to list Milford as being a suitable settlement for development. Milford should not have a defined settlement boundary. It is considered to be a unsustainable location and its character would be harmed by windfall development within it.

The council's own Settlement assessment (2022) makes it very clear that there is a dearth of local service provision. It confirms to that Milford is The settlement is within the Cannock Chase AONB, Cannock Chase SAC and SSSI lies to the southeast of the settlement and that the settlement lies within the Cannock Chase Special Area of Conservation 15km buffer.

The Green Belt abuts the settlement along its eastern boundary.

All of the above special features of Milford mean that is not an appropriate settlement in which to encourage additional windfall development

Policy 3. Development in the open countryside - general principles

Yes / No

Policy 3 Comments:

No comment at this stage and whilst Milford remains a tier 5 village identified in draft policy 2

Policy 4. Climate change development requirements

Yes / No

Policy 4 Comments:

These are agreed

Policy 5. Green Belt

Yes / No

Policy 5 Comments

No comment at this stage

Policy 6. Neighbourhood plans

Yes / No

Policy 6 Comments:

No comment at this stage

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?

No comment at this stage

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:

No comment at this stage

Policy 10. West of Stafford

Yes / No

Policy 10 Comments:

No comment at this stage

Policy 11. Stafford Station Gateway

Yes / No

Policy 11 Comments:

No comment at this stage

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:

These allocations are supported.

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 comment at this stage

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

Yes / No

Policy 14 Comments:

No comment at this stage

Policy 15. Stone Countryside Enhancement Area

Yes / No

Policy 15 Comments:

No comment at this stage

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:

No comment at this stage

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 comment at this stage

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:

A more positive approach should be taken to providing affordable housing off site or via commuted sums. Some smaller sites in rural areas are simply not suitable for the appropriate and efficient provision of affordable housing and accordingly are not favoured by providers.

The policy should make it clear in the policy that major means 10 housing units or more and that if less than 10 houses are sought then affordable housing will not be required.

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 comment at this stage

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, 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:

24 and 25 No comment at this stage

26 This is supported.

27 and 28 No comment at this stage

29 Point 1 should be amended so as to make it clear that sub vision of existing residential lots will not be accepted where even individually it would harm the character of the relevant residential site.

30 to 33 These are supported.

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:

34 to 38	These are supported
39	No comment at this stage

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: 41, 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:

42 and 43 The policy must also address sites at risk from surface water drainage. Where the sites are at risk from current or future flooding planning permission should not be granted unless a drainage strategy demonstrates that surface water flooding can be appropriately managed. Where this is not done then planning permission should be refused.

45 This is supported but it can be strengthened at B. It should be stated that proposals within an AONB development will be refused unless it demonstrably enhances visual, nature conservation and / or historic assets.

46 and 47 are supported

48 This is generally supported. It could however be strengthened by clarifying simply that within influencing distance of a SAC new development will not be allowed unless it clearly shown that it together within any mitigation would lead to enhancements of the essential features of the SAC.

49 to 51 are supported.

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:

52 and 53 These are supported

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:

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.

Yes

The existing Plan for Stafford Borough does not show a settlement boundary around Milford. This delineate or lack of should be carried forward into the replacement plan. Milford is not a sustainable location for development and encouraging windfall development within it by awarding it tier 5 status would both harm its character and lead to development proceeding in a non-sustainable location.

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.

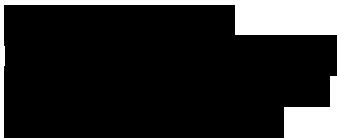
From: Gerald Willard [REDACTED]
Sent: 11 December 2022 14:15
To: SPP Consultations
Subject: Re: Local Plan 2020-2040 Preferred Options - Consultation (TIER \$ SITES IN Meir Heath AND ROUGH CLOSE)
Attachments: 2022 Poptions submission letter.pdf; Preferred-Options-Consultation-Response-Form.pdf

Hello

Please find the attached consultation response.

Gez Willard

Gez Willard





Forward Planning,
Stafford Borough Council,
Civic Centre,
Riverside,
Stafford,
ST16 3AQ

forwardplanningconsultations@staffordbc.gov.uk

SPPconsultations@staffordbc.gov.uk

11th December 2022

Dear Sir/madam

Re: Local Plan 2020-2040 Preferred Options - Consultation

Please find attached completed Preferred Options Consultation Form. This is submitted on behalf of a client who lives in Stafford Borough.

Yours Sincerely

Gez Willard.

M.R.T.P.I Chartered Town and Country Planner

[Redacted signature block]

Contact Details

Full name (required):

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
-

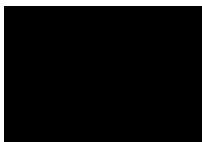
Organisation or Company Name (if applicable):

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:

Policy 1 is generally supported as this includes:

6. The permitting of housing on windfall sites within settlement boundaries where applications accord with the policies of this plan; and

7. The permitting of housing which accords with the policies of this plan on new housing in rural areas.

Additionally it is considered the distribution of housing ought to reflect the existing housing situation and 30% of new housing ought to be in sustainable rural locations.

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:

It is agreed that Meir Heath/Rough Close ought to be a tier 4 area.

The following is supported:

D. Within the settlement boundaries identified on the policies map and associated inset maps development will be supported subject to its compliance with other policies of this plan.

Policy 3. Development in the open countryside - general principles

Yes / No

Policy 3 Comments:

No comment at this stage.

Policy 4. Climate change development requirements

Yes / No

Policy 4 Comments:

No comment at this stage.

Policy 5. Green Belt

Yes / No

Policy 5 Comments

No comment at this stage.

Policy 6. Neighbourhood plans

Yes / No

Policy 6 Comments:

No comment at this stage.

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 comment at this stage.

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 comment at this stage.

Policy 10. West of Stafford

Yes / No

Policy 10 Comments:

No comment at this stage.

Policy 11. Stafford Station Gateway

Yes / No

Policy 11 Comments:

No comment at this stage.

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 comment at this stage.

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 comment at this stage.

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

Yes / No

Policy 14 Comments:

No comment at this stage.

Policy 15. Stone Countryside Enhancement Area

Yes / No

Policy 15 Comments:

No comment at this stage.

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:

No comment at this stage.

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 comment at this stage.

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 comment at this stage.

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 comment at this stage.

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 comment at this stage.

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 comment at this stage.

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 comment at this stage.

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 comment at this stage.

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 comment at this stage.

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 comment at this stage.

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.

No comment at this stage.

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.

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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: Gerald Willard [REDACTED]
Sent: 11 December 2022 13:06
To: forwardplanningconsultations; SPP Consultations
Cc: [REDACTED]
Subject: Re: Local Plan 2020-2040 Preferred Options - Consultation (STANDON MILL FARM)
Attachments: 2022 Poptions submission letter copy.pdf; Preferred-Options-Consultation-Response-Form copy.pdf

Hello.

Please find the attached response.

Gez Willard





Forward Planning,
Stafford Borough Council,
Civic Centre,
Riverside,
Stafford,
ST16 3AQ

forwardplanningconsultations@staffordbc.gov.uk

SPPconsultations@staffordbc.gov.uk

11th December 2022

Dear Sir/madam

Re: Local Plan 2020-2040 Preferred Options - Consultation

Please find attached completed Preferred Options Consultation Form. This is submitted on behalf of a client who who owns Standon Mill Farm.

Yours Sincerely

Gez Willard.

M.R.T.P.I Chartered Town and Country Planner

[Redacted signature block]

Contact Details

Full name (required):

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

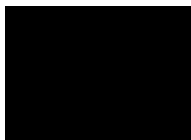
Organisation or Company Name (if applicable):

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?



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- **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.

Additional Comment

It is suggested that this list misses a chance to clearly establish (In accordance with the Taylor Review- "*Living Working Countryside*") the Borough's commitment to its rural area which comprises most of the Borough by all definitions. Indeed your own PO document says on page 14:

"The borough is predominantly rural, covering approximately 230 square miles." "The population of the borough in 2021 was 136,800 people, with a third of the population living in the borough's rural areas.

Perhaps you can add the following additional objective:

“To protect rural communities by supporting new housing in suitable locations and which can help to retain and grow local services such as rural schools, community uses and rural jobs in (including home working).”

Additional clarification could add the need to provide homes for older local people wishing to down-size and for small starter homes to encourage younger people to stay or move to rural areas.

Finally. The final paragraph on page 17 is very weak. It fails to address the breadth or depth of challenge rural areas face. It is so much more than just lost shops.

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:

Policy 2. Settlement Hierarchy (Tier 1:

Clause B6 should be broadened so as to allow for windfall development adjoining rural settlements and not just within them. The policy as written is in danger of leading to the loss of often long standing openness within settlements instead of properly allowing an examination of whether as site within or adjoining a settlement would be better in planning, design and community terms.

Clause E. The council is clearly disregarding the fact that 33% of the Borough is rural by setting a target of no more than 6% of new housing to be in rural areas. This can only hasten the decline of rural areas as vibrant communities as they become bastions of older non working people. There is an assumption that the urban bias in these policies is more sustainable but there is little evidence for this. Attention should be paid to a rural rebalance and protecting existing rural communities and their services by allowing new growth in line with existing population distribution. This would mean 33% of new allocations being in the rural area.

Stafford, Tier 2: Stone, Tier 3: Meecebrook, Tier 4: Larger settlements, Tier 5: Smaller settlements)

Yes / No

Policy 2 Comments:

At Clause D this should be broadened to all development "within or adjoining". See comments made in respect of policy 1.

Under the settlement hierarchy at clause E Standon is omitted as a tier 4 or even tier 5 settlement. This omission would bring about the stagnation of this community and puts its well regarded local school (All Saints C of E First School) and play group under existential threat along with the Church of All Saints which is a grade 1 Listed Building.

Policy 3. Development in the open countryside - general principles

Yes / No

Policy 3 Comments:

It is considered that there is an omission from the 11 categories of allowable development. Allowance also should be made for the following 3 additional categories:

12 The conversion of buildings on brownfield sites not within settlements including those last used but not needed for employment purposes

13. The redevelopment of redundant farm buildings including traditional and steel framed building where by dint of their design or location they are no longer suitable for agricultural purposes.

14. Limited infilling between houses by no more 1 or 2 dwellings of sites within villages

NB. All 3 are sensible and will help with delivering limited and organic growth within rural areas. 14 would bring general allowance in rural areas in line with that which applies in Green Belt locations.

Finally. No clarity as to why A and B are required. B should simply be rolled into the A list.

Policy 4. Climate change development requirements

Yes / No

Policy 4 Comments:

No comments at this stage

Policy 5. Green Belt

Yes / No

Policy 5 Comments

No comments at this stage

Policy 6. Neighbourhood plans

Yes / No

Policy 6 Comments:

No comments at this stage

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 at this stage

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 at this stage

Policy 10. West of Stafford

Yes / No

Policy 10 Comments:

No comments at this stage

Policy 11. Stafford Station Gateway

Yes / No

Policy 11 Comments:

No comments at this stage

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 at this stage

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 at this stage

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

Yes / No

Policy 14 Comments:

No comments at this stage

Policy 15. Stone Countryside Enhancement Area

Yes / No

Policy 15 Comments:

No comments at this stage

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:

Policy 16 Care must be taken that policies such as these do not stifle and interrupt natural market movements. Sometimes changed economics or business preference can make an employment use unviable. The change of use of such sites to viable ones should be encouraged and not discouraged. No amount of policy allocation can protect an extant employment use from the outward tide of economic change and planning policy should not seek so to do.

Clause D falls into this category. It is plainly preposterous to use the planning system to try and retain employment sites where such uses are no longer economically viable. Instead their change of use or redevelopment for housing uses ought to be supported by policy without qualification. Point 2 of Clause D of policy 16 should be deleted. Moreover such policy would exceed that which applied in the case of Green Belt employment sites.

Policy 18. This is a good forward looking policy proposal Clause B should also allow employment uses adjoining a settlement where more land is likely to be available and also the allowance should be for all service and/or employment generating uses Clause C should be removed it is wholly unnecessary and counter productive.

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:

Policy 21 is supported

Housing Policies

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

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 at this stage. The council will be expected to show that these draft policies are considered reasonable and deliverable by their partners and especially the Social landlords or those in the market housing sector delivering affordable homes.

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:

Policy 26. Clause 3 is generally supported. However the opposition to the conversion of steel framed buildings is contrary to the provisions allowed in respect of Class q conversion. Local policy must be in accord with national planning policy. In this respect draft policy is not.

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, 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 at this stage

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 at this stage

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 at this stage

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 at this stage

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:

Q14 and 15 The site assessments report is considered to be deficient in that it omits Standon from its examination. It would appear that this simply was because it was not put forward by the Parish Council. Standon has more than 50 dwellings within it and it is considered that planning officers ought to have considered it within the study.

The council ought to be concerned with rural settlements which have schools. These uses are the heart of vibrant communities. Positive planning policy process ought to be considering the possibility that schools may have declining pupil numbers and may become unviable. The council's assessment does say that schools are a 'key facility'. This makes it strange that they have omitted Standon from the assessment. At line 4.20 the assessment says:

Education

4.20 The presence of a school in a settlement, particularly a primary school (or first school), is considered a 'key facility' as it provides an opportunity to reduce the need to travel by car.

The population in Standon in 1931 was 428 but increased to 879 in 2011.

NB From "Key Figures for 2011 Census: Key Statistics". Neighbourhood Statistics. Office for National Statistics. Retrieved 27 March 2014.

Assuming average occupancy of 2.4 people per dwelling within the parish of Standon in 2011 there would have been at that stage in the order of 366 dwellings albeit most of these are not within the village itself.

It is advised and requested that as an addendum to the Settlement Assessment and Profiles Topic Paper, that Standon be reviewed again for possible inclusion in all probability as a tier 4 or 5 village.

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:

See above at Q14

It is suggested that Standon be considered a suitable village for new residential development and that a settlement boundary ought to be drawn around it which would allow for new housing. This settlement boundary ought to include Standon Mill and Standon Mill farm in addition to land adjoining the school. This additional land is already subject to submission under the council's SHELA exercise.

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: Preferred Options Consultation [REDACTED]
Sent: 12 December 2022 11:26
To: Strategic Planning Consultations
Subject: Preferred Options Consultation - Submitted Response

Full name: **Brian Edgecombe**

Email: [REDACTED]

Agents and Developers

Organisation or Company: **YES Building Design Ltd**

Age: **Prefer not to say / not applicable**

Added to database: [REDACTED]

Topics (Contents page): **Vision and Objectives**

Vision and Objectives

Q1 - Which 3 are most important to you? To deliver sustainable economic and housing growth to provide income and jobs., To deliver infrastructure led growth supported by accessible services and facilities. 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): **No**

Comments: How have the settlement boundaries been defined? There does not appear to be a description of this process. Some properties that are clearly part of a defined settlement have been excluded. Surely the concept of a settlement boundary should, in part, be subject to scrutiny at the time of an application and shall be tested against defined criteria, rather trying to exactly define the minutia of the settlement with a redline in the Plan. Settlement boundaries shown are very tightly defined which appear to exclude opportunity for infill development. The focus appears to support large developments for national builders, rather than providing opportunities through smaller parcels of land across the borough which allows greater opportunity for local businesses. To support all parts of the Borough, surely some housing allocation should be given to all communities and not just focused in the larger settlements or in the new garden village.

Policy 2 (Settlement Hierarchy): **No**

Comments: How have the settlement hierarchies been established? The 'New Local Plan

Settlement Assessment (July 2018)' document appears to have not considered Sandon, despite Sandon exceeding the small village criteria of 50 minimum houses and ticking all the requirements of the NPPF Paragraphs 28, 34 and 70 indicators referenced in the SBC assessment i.e. Shops, meeting places, sports venues, cultural buildings, places of worship, public houses, public transport provision, general store, community facility, employment opportunities and more. Sandon and has a wealth of facilities including: pub/restaurant, village shop, antiques shop, village halls, a nursery, a cricket ground, church, good transport links, mobile library, war memorial, tourist/visitor attractions with the canal, Sandon Hall, Sandon Estate events and considerable employment opportunities beyond the surrounding agricultural employment e.g. at the Dog and Doublet, Mumbles Day Nursery, Sandon Estate, Sandon Estate events. The core of Sandon is along the Lichfield Road, Sandon Road and Hilderstone Road. This is more compact and less linear or separated than other small villages included in tier 5 ie Croxton, Hilderstone, Hopton, Milford, Milwich and Moreton. We note that the summary comparison in section 7 of the 'New Local Plan Settlement Assessment (July 2018)' does not reflect the headings referenced in the NPPF Paragraphs 28, 34 and 70 i.e. shops, meeting places, sports venues, cultural buildings, places of worship, public houses, public transport provision, general store, community facility, employment opportunities None the less, it is clear that, compared to many of the other small villages, Sandon provides many of the facilities and services expected by the NPPF. Comparing this to nearby villages included within tier 5: Salt has a pub/restaurant and a church. Hopton has a village hall, sports ground and church. Milwich has a pub, church, village hall and remote school and remote post office Sandon has pub/restaurant, village shop, antiques shop, village halls, a nursery, a cricket ground, church, good transport links, mobile library, war memorial, tourist/visitor attractions with the canal, Sandon Hall, Sandon Estate events and considerable employment opportunities beyond the surrounding agricultural employment e.g. at the Dog and Doublet, Mumbles Day Nursery, Sandon Estate, Sandon Estate events From the above it is not possible to understand why Sandon has not been given Tier 5 status and a corresponding Settlement Boundary.

Policy 3 (Development in open countryside): No

Comments: A. Refer to comments on the referenced policies. B.1 Where development is deemed acceptable in principle this clause should start 'Firstly...'. It would seem overly restrictive to not allow some new building e.g. to support existing (non-agricultural) businesses if their needs develop and grow. If the policy is no new buildings for expansion of existing business, then this stifles the business and Stafford Borough economy. If the policy means that expansion of non-agricultural businesses can only be to move the larger settlements, with settlement boundaries, then this may affect the viability of the business and remove the business and it benefits from its current community. The policy does not comment on the replacement of existing buildings. We note that the NPPF para 149 does allow rebuilding within the greenbelt and this infers this would also be acceptable in the open countryside. The policy does not comment on the development of brownfield sites in the open countryside.

Policy 4 (Climate change and development requirements): No

Comments: Whilst we all agree that climate change is an issue that needs to be addressed, however, does this policy creates another layer of documentation with associated cost that is, in reality, beyond the realm of small developments to deliver. Is B expected to apply to all house building or just major development as A? Is D also expected to apply to all house building or just major development as A? Clearly there is a question of economies of scale which cannot be achieved through small developments. For these policies to be deliverable/successful they must link with energy producers and suppliers. Are they

required to cooperate and engage with SBC's proposed policies and with individual development proposals?

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: **No**

Comments: **The option to focus major development in the open countryside is contrary to many other aspects of the plan that seeks to protect the countryside. It is expected that a new large village would be the focus of all new infrastructure for years to come and this will deprive most other areas of Stafford of significant investment in infrastructure e.g. faster broadband. It must be remembered that the existing properties have been paying council tax for many years and it is only right that these properties should see upgrades to infrastructure to the same standards as expected for new properties. We see the policy 37 deals with infrastructure to support new development, but where is the policy that deals with upgrading infrastructure across the Borough? To be inclusive, surely Meece Brook, and all major development, should include provision for gypsy and traveller accommodation.**

Site Allocation Policies

Q4 - Do you agree with the proposed allocations?

Policy 9 (North of Stafford): **No**

Comments: **Development should be more widely spread across the Borough**

Policy 10 (West of Stafford): **No**

Comments: **Development should be more widely spread across the Borough**

Policy 11 (Stafford Station Gateway): **No**

Comments: **Development should be more widely spread across the Borough**

Policy 12 (Other housing and employment land): **No**

Comments: **What appears to be missing here is the identification of brownfield sites across the Borough that should be considered for development ahead of open countryside e.g. Meece Brook. While the employment land allocation is welcomed, from a sustainability point of view, to promote greener transport, surely employment sites should be distributed more widely across the Borough.**

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**

Comments: Policy 17 – Recognised Industrial estates The Expansion of the Ladfordfields site is welcomed, however, there will be significant infrastructure costs to develop Ladfordfields further e.g. with a new access/highway improvements and utilities. Policies require the retention of existing features e.g. the ponds, which also reduce the deliverable area of usable commercial land. Given the prevailing clay ground conditions, the disposal of storm water is likely to be via attenuation ponds and discharge to the nearby brook to the north east. The large attenuation ponds will further reduce the area of useable land. To provide sufficient employment land to fund the infrastructure costs and to link with the brook the site should be extend to include the adjacent field to the east. Policy 18 – Home working and small scale employment uses While A. Suggests that small scale employment and the development and expansion of small businesses in rural areas will generally be supported, C. appears to be overly restrictive. Does the 100 sqm just apply to office use or all employment uses? In rural locations, the available buildings to be utilized may be larger than 100 sqm and this begs the question as to what happens to the other parts of the building? In C. the words ‘is complimentary to and would and’ should be removed. In this changed world where home working is more accepted and widely encouraged, there should not be a need to be prescriptive about the type of business (unless potentially harmful or a nuisance) for this small scale use. To support small scale employment and the development and expansion of established viable small businesses, the need for extensions should be considered. The only option should not be to move to a RIE. If it is, this very significant upheaval is likely to affect viability and therefore stifle growth and the local economy. Also, the business’ client base may be very local and a forced moved would again impact the business. Clearly some locations will be better suited to the expansion of a business and each proposal shall be assessed on its own merits.

Q7 - The Stafford Borough Plan proposes policies around the town centres uses, agriculture and forestry development, tourism development and canals. Do you agree? **No**

Comments: **Policy 20 Agricultural and forestry development Should 20.1 include ‘...the processing and sale of ...’ and the list include timber processing. Policy 22 Canals The wording to 3 is unclear. It appears to limit the development and excludes associated uses that could be welcomed by the marina uses and the local community. To make developments viable a range of complimentary uses are likely to be needed. Surely SBC want to encourage successful enterprises and encourage visitors to the area.**

Housing Policies

Q8 - The local plan proposed a policy (23) on affordable housing. Do you agree? **No**

Comments: **Policy 23. Affordable Housing A 1 & 2.** While it appears that affordable housing is to being encouraged, this is not the case as the defined settlement boundaries for the majority of villages listed do have any scope for new housing. To make this policy deliverable, the settlement boundaries need to have some scope for infill development and rural brownfield sites identified for redevelopment.

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: **Policy 30. Gypsy and traveller accommodation** It is perplexing that both the proposed sites are outside settlement boundaries and, by default, are deemed to be not in sustainable locations and, therefore, development at these sites would not usually be supported. Why has SBC not identified sites in sustainable locations? Surely the major development sites and the new Meece Brook village provide good opportunities to address this need and provide integration of communities.

Q10 - The local plan proposes policies around homes for life, rural exception sites, new rural dwellings, replacement dwellings, extension etc. Do you agree? **No**

Comments: **Policy 24. Bungalows** The policies do not mention bungalows. It is expected that most people with a mobility issues would prefer to live in a bungalow. What is SBC's target for this type of home? **E.** The minimum provision of private external space for flats is not well defined. **Policy 25. Rural exception sites A.** Is the 'directly adjoining' requirement too prescriptive? Could this not be 'well connected' or similar? **B.** Should a 'right to buy' be excluded. Surely this natural process should be available to all tenants, in all communities. **Policy 26. New rural dwellings** To support all communities and those living there, and their children, some infill development should be allowed in all communities. **Policy 27. Replacement dwellings 7.** While it may desirable to maintain a similar setting for the new building, on many occasions the location of the replacement may enhance the setting or make little difference or facilitate a more economical build if the house to be removed can still be lived in until the replacement is completed. Each case should be considered on its own merits. The plan does not comment on replacement outbuildings outside of settlement boundaries. As previously noted the NPPF para 149 does allow rebuilding within the greenbelt and this infers this would also be acceptable in the open countryside. **Policy 28. Extension to dwellings C.3.** On occasion the size of an extension is determined from the 'fall back' position established by permitted development. This should be acknowledged as an acceptable way to confirm the size allowed for extensions. **Policy 29. Residential subdivision and conversion** The policy does not comment on residential sub-division and conversion outside settlement boundaries (although policy 3 does touch on conversions). We note that the NPPF para 80 d. does allow subdivision. This should be reflected in this policy. **Policy 31. Housing mix and density A.** This specified need by SBC is undeliverable as there is no housing allocation in most tier 4 or 5 settlements. **Policy 32. Residential amenity** For this policy it is assumed that the Design SPD will be reviewed and updated as parts of overly restrictive and simplified compared to similar documents from other authorities. **Policy 33. Extension of the curtilage of a dwelling** The policy is potentially too restrictive and each case should be considered on its own merits. For example adding curtilage land to Class Q changes of use typically adds the obvious curtilage of the barn to provide amenity space.

Design and Infrastructure Policies

Q11 - Do you agree with policies? **No**

Comments: **Policy 40. Renewable and low carbon energy** The associated policy map shows solar panels on Sandon Park which is grade II listed. Surely this proposed use would be inappropriate. We notice that hydrogen generation does not appear to be mentioned. The policy maps only consider greenfield locations. Surely renewable energy should be embedded in new development for example all new development and especially larger sheds, should have solar panels in preference to removing farmland for fields of solar panels. The paragraph referencing in this policy is wrong.

Environment Policies

Q12 - Do you agree with policies? **No**

Comments: **Policy 48. Cannock Chase Special Area of Conservation** The wording to C. should be amended to reflect the wording of The Conservation of Habitats and Species Regulations 2017, reg. 76 & 77 which requires an applicant to apply under regulation prior to commencing development i.e. post the prior approval under the general development order.

Connections

Q13 - Do you agree with policies? **No reply**

Comments: **No reply**

Evidence Base

Q14 - Have we considered all relevant studies and reports? **No**

Comments: **In the case of consider tier 5 villages Sandon has not been considered whereas there is clear evidence to justify its inclusion. Supporting evidence can be sent if required.**

Q15 - Do you think there is any further evidence required? **Yes**

Comments: **The SPD documents should be developed to support the policies. Studies of infrastructure deficiencies across the Borough should be undertaken and included in the policies with proposals to upgrade these parts of the Borough. The impact of HS2 is the elephant in the room. This is barely mentioned and the route and associated land take does not appear on the policy maps. This national development will have the most significant effect on the shape of the Borough going forward and should be considered in the plan.**

General Comments:

We would be pleased to discuss our comments with you and we would like to be kept informed about further reviews and the progression of the Plan.