

**Stafford Borough  
Local Plan 2020 - 2040:  
Preferred Options  
Responses**

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**Agents, Developers and  
Landowners - Part 3**

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Stone - Part A

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**From:** Neil Cox [REDACTED]  
**Sent:** 12 December 2022 11:51  
**To:** Strategic Planning  
**Cc:** [REDACTED]  
**Subject:** EP007: Preferred Options Representation: Land at Eccleshall Road, Stone  
**Attachments:** EP007\_PO\_FINAL\_121222RevA.pdf

Dear Strategic Planning Team,

Please find attached representations submitted on behalf of Bloor Homes Ltd in respect of land interests at Eccleshall Road, Stone.

Please do not hesitate to contact me if you require any further information or if you would like to receive the appendices to Appendix 4.

I intend to send a separate email with a wetransfer link with higher resolution versions of all documents submitted.

I would welcome receipt due to the file size.

Kind regards

**Neil Cox**  
Director



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# STAFFORD BOROUGH LOCAL PLAN 2020-2040 PREFERRED OPTIONS

LAND AT ECCLESHALL ROAD, STONE



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# 1. Introduction

- 1.1 This representation, submitted on behalf of Bloor Homes UK Ltd, responds to the Regulation 18 'Preferred Options' consultation document and accompanying published evidence, having regard to the national and local planning policy context. It relates specifically to Land at Eccleshall Road, Stone where Bloor Homes has secured land interests. A site location plan is attached at **Appendix 1**.
- 1.2 The representations are framed in the context of the requirements of Local Plans to be legally compliant and sound. The tests of soundness are set out in the National Planning Policy Framework (NPPF), paragraph 35. For a Development Plan to be sound it must be:
- **Positively prepared** – providing a strategy which, as a minimum, seeks to meet objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
  - **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
  - **Effective** – deliverable over the Plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
  - **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the Framework and other statements of national planning policy, where relevant.
- 1.3 These representations also give consideration to the legal and procedural requirements associated with the plan-making process.

## 2. Planning Policy Context

- 2.1 Bloor Homes supports Stafford Borough Council's decision to progress the review of the adopted Stafford Borough Local Plan. This provides an opportunity for the Council to comprehensively review the vision, strategic objectives, development requirements, spatial development strategy and policies for shaping detailed development proposals.
- 2.2 The most recent National Planning Policy Framework (NPPF) (July 2021) requires local planning authorities to keep their Local Plan up to date by undertaking a review at least every five years. The proposed timescales, as set out within the Local Development Scheme, will ensure that an up-to-date Local Plan for the Borough will be in place to support growth and meet future development needs, noting The Plan for Stafford Borough was adopted in 2012.
- 2.3 The Local Plan Review is necessary in order to respond to the need for continued growth within the Borough to 2040 and to ensure consistency with national policy and guidance.
- 2.4 The Preferred Options consultation follows the previous Issues and Options consultation which identified a range of growth options. Bloor Homes supported Scenario F which reflected jobs growth experienced within the Borough between 2000 and 2018 and distribution of growth over a wide geographical area in line with the identified settlement hierarchy, with limited reliance placed on delivery of a new settlement.
- 2.5 Bloor Homes supports the Council's proactive approach in continuing with a review of the Local Plan to ensure that an up-to-date policy framework exists within the Borough to guide growth to 2040 and to ensure that development is genuinely plan led.

### 3. Vision & Objectives

- 3.1 Bloor Homes welcomes the proposed approach to streamlining the Vision and Objectives in contrast to those contained within The Plan for Stafford Borough.
- 3.2 Through the Issues and Options consultation Bloor Homes supported the proposal to shorten the Vision and remove sub-visions for Stafford and Stone which would more usefully sit within Neighbourhood Plans to be defined and refined by local communities. Whilst the Vision is clear and succinct, as presently drafted, it doesn't appear locally relevant and contains no spatially specific references.
- 3.3 In addition, if Stafford Borough Council is to pursue a Garden Community at Meecebrook, the Vision should look beyond 2040, for at least 30 years from adoption, in line with the requirements of paragraph 22 of the NPPF.
- 3.4 In respect of the proposed Objectives, these appear succinct and thematic. Bloor Homes requests that Objective 4 is broadened to recognise housing growth would provide income and jobs and meet identified housing needs.



## 4. Development Strategy & Climate Change Response

- 4.1 Bloor Homes would wish to raise significant concerns with the intended approach to determining the quantum and spatial distribution of growth identified through the Preferred Options consultation document.

### Housing Requirement

- 4.2 Policy 1 proposes provision of 10,700 new homes to be delivered between 2020 and 2040 (535 dpa). This equates to 8,700 homes to meet local needs and a contribution of a further 2,000 homes to meet unmet needs of other authorities within the region.
- 4.3 Bloor Homes has previously submitted comments in respect of the Economic and Housing Development Needs Assessment (EHDNA). Bloor Homes supported the alignment of new homes and jobs growth but did not support the use of Scenario D to inform an appropriate housing requirement for the Borough.
- 4.4 Scenario D, which utilised the Cambridge Econometrics jobs growth projections, assumes no increase in the proportion of jobs filled by people commuting from outside the Borough or a reduction in the proportion of economically active residents commuting out of the Borough. Scenario D provided the lowest housing growth projected based on the four economic growth scenarios tested.
- 4.5 Scenario E included an uplift in homes to reflect additional jobs growth created to 2040 through employment sites at a new garden community and Stafford Station Gateway. Bloor Homes supported Scenario E as an absolute minimum if a garden community were to be pursued. A new garden community and the Stafford Station Gateway are now proposed as part of the development strategy.
- 4.6 Scenario F, supported previously by Bloor Homes, aligned housing growth to jobs growth experience between 2000 and 2018 (a period that included a significant period of economic uncertainty). Bloor Homes considers that this represents an appropriate scenario to consider growth over a 20 year period to 2040 which again is likely to include cyclical changes in the economy.
- 4.7 The Preferred Option for housing growth aligns to Scenario D which is not supported by Bloor Homes as it projects the lowest housing growth of all four economic growth scenarios tested.

### Cross Boundary Housing Needs

- 4.8 The Council recognises the migratory links between the Borough and both North Staffordshire and the Greater Birmingham and Black Country Housing Market Areas (HMAs). Stafford Borough, as a discrete HMA in itself is sandwiched between these two neighbouring HMAs. It is clear from evidence that has been published by LPAs within both neighbouring HMAs that the urban areas are unable to meet their own housing needs. This has been further exacerbated by an urban centres uplift applied to Stoke-on-Trent, Birmingham and Wolverhampton. In addition, it is noted that the Black Country Authorities have requested that Stafford Borough Council takes between 1,500 and 2,000 homes as a contribution to meeting unmet needs in the Black Country.
- 4.9 Bloor Homes therefore supports the commitment of Stafford Borough Council to providing a contribution to assist in meeting these unmet housing needs. However, the proposed contribution of 2,000 homes should be explored and reviewed through the ongoing Duty to Cooperate with LPAs within neighbouring HMAs. In light of most recent evidence in respect of urban capacity, Birmingham City Council's stance contained within their latest Issues and Options consultation document that Birmingham is likely to experience a shortfall in housing provision of close to 80,000 homes by 2042. This is in addition to the 28,239 home shortfall evidence by the Black Country LPAs to 2038 and any shortfall to be experienced within Stoke on Trent.

#### Balance Between Housing and Jobs Growth

- 4.10 The Council's Preferred Development Strategy seeks to pursue Scenario D in respect of the housing requirement and a level of employment growth that is far in excess of all HEDNA Scenarios with a level of employment land in excess of the OAN range contained within the HEDNA.
- 4.11 The HEDNA states that *"the selection of the final employment land requirement will depend upon the preferred level of employment growth for the Borough and the extent to which Officers consider that this aligns with the Council's economic aspirations and housing targets, including the need to reduce net out commuting."* Bloor Homes does not accept that this balance has been achieved.
- 4.12 Bloor Homes considers the preferred development strategy is unbalanced and likely to result in a much higher level of jobs being created to 2040 than an increase in the working age population that would be resultant of the delivery of 535 net new homes a year, even with an additional contribution of 2,000 homes over the plan period to meet cross boundary shortfalls. Instead, this strategy would increase the level of unsustainable travel experienced.

- 4.13 If the Council pursues the preferred strategy for employment an uplift in the level of homes delivered is required to ensure a balance between increased jobs and working age population to support these jobs.

#### Distribution of Growth

- 4.14 Bloor Homes maintains the position that it is important that a range of sites across a wide geographical area should be identified to provide greater certainty of delivery. Bloor Homes considers that the spatial distribution of growth should be driven primarily by sustainability and the existing settlement hierarchy where possible support the creation of sustainable communities. Bloor Homes would therefore recommend the inclusion of sustainable extensions to the top-tier settlements as a primary driver of growth, including within Stafford, Stone and the Larger Settlements.
- 4.15 Bloor Homes therefore objects to over 50% of the new supply sources being focused to an isolated location at Meecebrook at the expense of growth provided to Stone and the Larger Settlements. This not only provides an unsustainable distribution of housing growth but undermines the delivery of the Local Plan through over reliance on delivery of this Garden Community.
- 4.16 Bloor Homes accepts the distribution of housing growth to 2040 will be heavily influenced by existing housing commitments within the Borough, which equate to 5,913 new homes as of 31<sup>st</sup> March 2022, however, the new Local Plan provides an opportunity to rebalance the distribution of housing growth in line with the proposed settlement hierarchy.
- 4.17 However, the preferred distribution of growth set out within the Preferred options document is unbalanced, with Stone the focus for just 7% of housing growth over plan period compared to 59% in Stafford, 24% in Meecebrook and 4% in the larger settlements.
- 4.18 The 7% of housing growth focused to Stone does not reflect Stone's role as the second settlement of the settlement hierarchy set by Policy 2 which recognises its important role as a market town, second principal town and main provider of services, facilities, employment and transport links.
- 4.19 In addition, Bloor Homes considers housing growth and jobs growth are intrinsically linked. To ensure balanced and sustainable communities, housing growth should be focused to locations where job opportunities are present, having regard to not only planned employment allocation, but existing employment generating uses.

- 4.20 Instead Meecebrook Garden Community appears to represent a diversion of the housing supply away from Stone and the Larger Settlements; a strategy of not making best use of existing infrastructure within sustainable settlements containing existing employment, but the pursuit of the creation of an isolated, predominantly greenfield land led, settlement which runs the real risk of not performing as a sustainable community.
- 4.21 Meecebrook Garden Community should not be highlighted as the intended location for meeting housing needs from other authorities. Instead, any appropriate uplift provided to meet unmet needs from neighbouring authorities should form part of a comprehensive distribution of growth across the Borough within an integrated spatial development strategy. Stafford and Stone, for example, are better placed to meet needs arising from neighbouring areas due to existing public transport links, including the provision of existing, well served railway stations.
- 4.22 Bloor Homes fundamentally disagrees with the statement contained within the Housing & Employment Land Requirement Topic Paper that *“the rural peripheries of Stafford and Stone, have inferior sustainable transport links”* to Meecebrook and therefore growth in these areas *“would be less likely to contribute to the achievement of sustainable development.”*

### Housing Supply

- 4.23 Bloor Homes does not agree that the identified sources of supply will provide a 10% supply buffer above the preferred minimum requirements. This is explored in further chapters to this representation having regard to the assumed supply that can be achieved at a new Garden Community at Meecebrook.

### Stone Settlement Strategy

- 4.24 Bloor Homes objects to the housing requirement identified for Stone but supports the proposed settlement strategy in other respects. Increasing the level of homes focused to Stone would assist in delivering increased affordable housing, support employment growth and the viability and vitality of town centre uses.

### Settlement Hierarchy

- 4.25 Bloor Homes broadly supports the settlement hierarchy outlined in Policy 2 which considers the relative sustainability of settlements within Stafford Borough. The Tier 1 and Tier 2 settlements identified contain the widest range of services and facilities and therefore focusing new homes to these settlements

would provide an opportunity to increase sustainability and self-containment. Stone is the second most sustainable settlement after Stafford with a wide range of services, facilities, access to employment and sustainable transport links.

- 4.26 Bloor Homes would question the inclusion of Meecebrook within the settlement hierarchy at this stage as development has yet to commence and uncertainty remains in respect of delivery and the level of services and facilities that can realistically be provided if it were to come to fruition. Further information is provided in respect of Meecebrook in Chapter 5 to these representations.

## 5. Meecebrook Garden Community

5.1 Bloor Homes considers the approach to Meecebrook Garden Community is fundamentally unsound.

5.2 In 2019 the Council secured Garden Community status and received over £1m of Government funding to support the development of visionary and evidence based documents. Since this time the form of the proposal has altered significantly through:

- Removal of the Ministry of Defence land, resulting in a predominantly greenfield site and no significant controlling landowner; and
- Reduction in quantum of homes from 10,000 to 6,000.

5.3 The Government's Garden Communities Prospectus (2018) highlights the prioritisation of proposals for settlements that will deliver more than 10,000 new homes, but offers support for proposals which are particularly strong in the following aspects:

- Demonstrating exceptional quality or innovations;
- Development on predominantly brownfield sites;
- Being in an area of particularly high housing demand; or
- Ability to expand substantially further in the future.

5.4 Following the removal of the significant brownfield element of the proposal, Meecebrook Garden Village is not considered strong in any of the aspects identified above. A reduction in the overall level of growth that can be realistically delivered at Meecebrook also gives rise to questions regarding the ability for necessary infrastructure to be delivered to allow the community to function self-sufficiently on a day-to-day basis. The opportunity for further growth is also constrained following the withdrawal of the adjacent Ministry of Defence land.

5.5 A new Garden Community at Meecebrook would require significant investment in new infrastructure to create a sustainable community with a good degree of self-containment. The broad extent of this supporting infrastructure is set out in Policy 7. The Council's Stage 1 Viability Report determined that Meecebrook is 'marginally viable' and engagement with the various landowners is required to 'solidify a red line boundary and manage expectations.' This is despite no actual costs being provided for S106 or infrastructure for Meecebrook. In addition, no

abnormal costs for Meecebrook were provided to inform the Stage 1 Viability Assessment as confirmed in para 6.15. The Stage 1 report also identifies that the infrastructure costs for Meecebrook per dwelling would be higher than those for Station Gateway due to its rural greenfield typology.

- 5.6 As part of the infrastructure requirements for Meecebrook, Policy 7 requires the delivery of a new railway station on the West Coast Main Line. Bloor Homes considers the delivery of a train station to support a new community is fundamental to the creation of a sustainable community in this location which is not well served by strategic highway infrastructure or existing sustainable transport links.
- 5.7 Intermodality has been commissioned by a consortium of promoters and developers, including Bloor Homes, to review the Council's proposals for the new station. This review is attached at **Appendix 3** to this representation.
- 5.8 The review, which considers the pre-feasibility and feasibility studies, highlights a number of key issues and areas of risk in developing a brand new, multi-platform station on the West Coast Main Line, 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 in a post-COVID future;
- 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; and
- 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.

5.9 The evidence published by the Council has been prepared without engagement with the rail industry. This is a fundamental concern that means the merits, deliverability and acceptability of the proposed new station cannot be confirmed at this stage.

5.10 The Council's evidence determines that a new station would not provide value for money until the proposal is completed. Assuming the Council's lead in time and delivery rates incorporated in the draft housing trajectory, completion of 6,000 homes would not be achieved before 2050, yet the fully operational date of the railway station is assumed to be 2026; some 4 years prior to the completion of the first property. With, at best a medium level of value for money on completion of Meecebrook, the viability of a new station is highly questionable, particularly in the intervening period between 2026 and 2050.

5.11 Bloor Homes considers the deliverability of a new railway station at Meecebrook is minimal at best, with the merits and deliverability carrying no weight in the absence of a review and validation by Network Rail and wider rail industry stakeholders. Lack of a new railway station at Meecebrook would undermine the sustainability merits of the Garden Community.

### Delivery Timescales

5.12 The housing trajectory contained within the Preferred Options document assumes first completions within Meecebrook in 2030/31 and continuation of delivery beyond the plan period. Bloor Homes considers that a delivery of first homes in 2030/31 is unrealistic and lacking justification.



5.13 The Garden Community is being promoted by the Council. The site comprises land in multiple ownerships and requires the delivery of significant infrastructure which is likely to require a land equalisation agreement. There is no prospect of the new settlement being commenced in the next five years and delivery timescales would need to take account of:

- Progression of technical evidence to consider constraints and viability
- Business Case for new railway station/funding secured
- Preparation of SPD
- Preparation of comprehensive Masterplan and Design Code
- Preparation of Outline Planning Application
- Land equalisation and signing of S106 Agreement
- Identification of developer partner(s)
- Reserved Matters applications
- Discharge of pre-commencement conditions
- Acquisition of land by development partner
- Technical design and approval of enabling infrastructure
- Selection and mobilisation of contractors for enabling infrastructure

5.14 Lichfield's Start to Finish Report (Second Edition) identifies the average lead in time from validation of an outline application to delivery of the first dwelling on sites of 2,000+ dwellings as 8.4 years.

5.15 The lead in time of 4.5 years for sites of 500+ dwellings set out in the Council's Lead In and Build Rate Assumptions Topic Paper is not appropriate for Meecebrook Garden Community. Bloor Homes considers that the anticipated lead in time identified (2030/31) is far too optimistic. The assumptions also contradict the FAQs published by the Council which recognises that *"there are no plans to start until at least 2030 – and Meecebrook will be developed over a long period of time which could span a 30 year or more period."*

5.16 The Lead in and Build Rate Assumptions Topic Paper also considers the assumptions utilised by neighbouring authorities. These assumptions are not

relevant in respect of Meecebrook as none of these authorities are proposing a new settlement as part of their emerging Local Plans.

- 5.17 Bloor Homes considers that a new settlement at Meecebrook is unlikely to provide housing supply until 2034/5 at the earliest; 9 years beyond the scheduled adoption of the Local Plan and proposed supplementary planning document. This assumes that all technical evidence required to support the proposal (including business case and funding stream secured for railway station) is completed in tandem with the Local Plan review process and an outline application submitted in 2025 following swift adoption of the SPD.
- 5.18 In light of these more realistic timescales, Bloor Homes considers that allocation of a Garden Community at Meecebrook should be postponed and considered through a future Local Plan review in 5-10 years' time.

#### Delivery rates

- 5.19 The Council is assuming a delivery rate of 300dpa from 2030/31 as set out in the housing trajectory. As stated previously, the FAQs published by the Council assumes a build out period in excess of 30 years. This contradicts the trajectory which assumes 6,000 homes to be delivered over a period of 20 years.
- 5.20 The Council's Lead-in Times and Build Rate Assumptions Topic Paper concludes an annual build rate assumption of 160dpa for sites of 2,000+ dwellings. This assumption assumes multiple outlets with phases being completed simultaneously. The Topic Paper rightfully recognises that build rates do not double as the site size doubles. It is noted the Topic Paper caveats that sites or more than 2,000 dwellings are assumed to have their own projected housing trajectory so will not necessarily follow the assumption of 160dpa. The Topic Paper fails to provide the necessary evidence to support the 300dpa build out rate afforded to Meecebrook Garden Community within the draft housing trajectory contained within the Preferred Options consultation document.
- 5.21 Lichfield's Start to Finish Report (Second Edition) concludes the average completion rate on sites of 2,000+ dwellings equate to a mean of 160dpa. The highest site average recorded was 268dpa.
- 5.22 There is no compelling evidence to justify a delivery rate assumption in excess of 160dpa for Meecebrook garden Village. In reality, the pace of delivery will be related to, firstly, the critical infrastructure triggers and, secondly, how quickly demand for new homes will build up as a desirable place well served by community facilities is delivered. This is likely to result in a reduced annual delivery rate in early years.

- 5.23 Applying an average delivery rate of 160 dwellings from 2033/34 would result in a maximum supply of 1,120 dwellings within the plan period. This is significantly less than the 3,000 dwellings currently assumed by the Council and represents a level of development that would fail to support key infrastructure requirements to allow for an acceptable level of self-containment and inherent sustainability within a plan period to 2040.
- 5.24 Again, this supports a view that a Garden Community proposal is a source of supply that should be considered through a future Local Plan review.
- 5.25 With regard to the delivery of Meecebrook Garden Community, Bloor Homes considers this would have a number of disbenefits including requiring significant investment in new infrastructure, relying on long lead in times of a minimum of 8.4 years from the validation of an outline application and increased uncertainty related to delivery assumptions due to potential market saturation. Therefore, it is contended that proposed spatial strategy relies too heavily on the delivery of this new Garden Community. With reference to our comments set out above in respect of the housing requirement scenarios, and the potential for the Borough to accommodate increased housing numbers to 2040, it is clear that there is scope for a wide range of sites geographically spread across the Borough in accordance with the settlement hierarchy, without the need to rely on the possible inclusion of a Garden Community.

## 6. Site Allocation Policies

- 6.1 Bloor Homes has raised objections to the spatial distribution of growth proposed within Policy 1 and maintains a view that further allocations should be identified within the Tier 2 settlement of Stone and the Tier 4 Larger Settlements to create a balanced spatial strategy.

### Policy 9. North of Stafford

- 6.2 Bloor Homes supports the continued allocation of land to the north of Stafford to support the delivery of the remaining allocation of 2,700 new homes. Bloor Homes has control of land within this Strategic Development Location and is progressing proposals.

### Policy 12. Other Housing & Employment Land Allocations

- 6.3 In light of deliverability issues highlighted at the proposed Meecebrook Garden Community, further allocations should be identified to meet the shortfall in supply from this source within the plan period to 2040, including land at Eccleshall Road, Stone.
- 6.4 Bloor Homes notes that the proposed allocations at the Former Staffordshire University Campus (HOP03) and MoD Site 4 (HOP08) are identified as not being currently achievable and are not counted in the housing trajectory for the plan period.
- 6.5 On the basis these two proposed allocations are currently unachievable, Bloor Homes would question the 'soundness' of these allocations and considers these should be reconsidered through a future local plan review.

### Policy 15. Stone Countryside Enhancement Area

- 6.6 Bloor Homes supports the proposed Stone Countryside Enhancement Area allocation to provide a major nature conservation and recreation resource for the town of Stone.
- 6.7 This Enhancement Area provides an opportunity for development within Stone to contribute towards the identified enhancements as part of a package of contributions.

## 7. Housing Policies

- 7.1 Bloor Homes wishes to raise a number of comments in respect of the preferred policies to shape the mix and form of housing to be delivered within Stafford Borough to 2040, recognising that any policy burdens or specific requirements need be considered through a whole plan viability assessment and justified through robust evidence.

### Policy 23. Affordable Housing

- 7.2 Bloor Homes supports the approach of Whole Plan Viability to inform affordable housing requirements.
- 7.3 Having reviewed the Local Plan Viability Assessment Bloor Homes wishes to raise concerns that the benchmarking exercise only considered development sites of under 50 dwellings on greenfield sites in the high value areas. This fails to consider a range of site options that have been put forward by promoters, including those put forward by Bloor Homes at Stone (Rural) and Eccleshall.
- 7.4 Bloor Homes can confirm however that both sites can support the delivery of 40% affordable housing in line with the proposed tenure mix identified. Bloor Homes is satisfied that the tenure mix has been informed by the EHDNA.
- 7.5 It is assumed that First Homes to be delivered in Stafford Borough would be subject to the minimum 30% discount however, the emerging Policy should provide this clarification. The discount assumption contained within the Local Plan Viability report assumed a 30% discount.

### Policy 24. Homes for Life

- 7.6 If the Council wishes to adopt the higher optional standards for Part M Category 2 and 3 then this should only be done in accordance with the NPPF (paragraph 127f & Footnote 46). The Written Ministerial Statement (WMS) dated 25th March 2015 stated that *"the optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG."*
- 7.7 The Economic and Housing Development Needs Assessment provides an overview of those living with a long-term health problem or disability (LTHPD) and concludes a need for accessible and adaptable homes provision. Bloor Homes considers that the preferred policy approach in respect of accessible and adaptable dwellings is evidenced and sound.

7.8 Bloor Homes maintain a position that the acceptability of dwelling design and provision of external spaces should be considered on a site-by-site basis.

7.9 The NDSS was published by the Department of Communities and Local Government on 27 March 2015. Its publication was accompanied by a Planning Update issued as a Written Ministerial Statement to Parliament by the Rt. Hon. Sir Eric Pickles MP on 25th March 2015.

7.10 In introducing the standards, the Written Ministerial Statement outlines:

*"New homes need to be high quality, accessible and sustainable. To achieve this, the government has created a new approach for the setting of technical standards for new housing. This rationalises the many differing existing standards into a simpler, streamlined system which will reduce burdens and help bring forward much needed new homes."*

7.11 However, the Written Ministerial Statement is also clear that the standards are optional, and that compliance cannot be required outside of a relevant current Local Plan policy:

*"From 1 October 2015: Existing Local Plan, neighbourhood plan, and supplementary planning document policies relating to water efficiency, access and internal space should be interpreted by reference to the nearest equivalent new national technical standard. Decision takers should only require compliance with the new national technical standards where there is a relevant current Local Plan policy."*

7.12 This is to ensure that the need for the application of the standards through planning policy is fully evidenced and that the impact on viability is considered alongside all of the other policies contained in the Plan:

*"The optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the National Planning Policy Framework and Planning Guidance."*

7.13 The reference to the National Planning Policy Framework relates to paragraph 174 which states:

*"Local planning authorities should set out their policy on local standards in the Local Plan, including requirements for affordable housing. They should assess the likely cumulative impacts on development in their area of all existing and proposed local standards, supplementary planning*

*documents and policies that support the development plan, when added to nationally required standards. In order to be appropriate, the cumulative impact of these standards and policies should not put implementation of the plan at serious risk, and should facilitate development throughout the economic cycle. Evidence supporting the assessment should be proportionate, using only appropriate available evidence."*

7.14 The reference to the National Planning Guidance relates to the following:

*"Where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas:*

- *need – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.*
- *viability – the impact of adopting the space standard should be considered as part of a plan's viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.*
- *timing – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions."*

7.15 The Guidance is therefore clear that the application of the NDSS requires a Local Plan policy which has been fully evidenced, including identification of need and the consideration of any impact on viability. If the Council were to consider introducing such a requirement, further evidence is necessary.

7.16 Regarding need, no justification or evidence is provided and until it is the NDSS should not be applied to any site on the premise it would be unsound. Bloor Homes consider there is unlikely to be any local circumstances within Stafford Borough that would support such an imposition of the Nationally Described Space Standards (NDSS). There is no such support contained within the published Economic and Housing Development Needs Assessment.

7.17 Regarding viability, there is an intrinsic link between the affordability of a property and its size (in floorspace) typically expressed as a cost (£) per square metre (or square foot). Should the NDSS be implemented within Stafford

Borough, the building costs would increase, and these additional costs would be offset by the increase in market value, estimated to be in the order of 10%.

- 7.18 Therefore, artificially increasing the floor area of properties to achieve NDSS standards would serve the purpose of 'pricing out' a number of potential purchasers that have a current housing need. This is despite local evidence justifying a significant affordability issue being present within the Borough.

### Policy 31. Housing Mix

- 7.19 Bloor Homes supports the considers that it is most appropriate for housing mix to be guided by market signals, as defined within the most up-to-date assessment of needs. The assessment of needs should be routinely updated across the 20-year Plan period. This ensures that housing mix is reflective of market-driven need.
- 7.20 Bloor Homes does however recognise the recommended range provides a good level of flexibility to allow for changing market signals across the Plan period and in different locations within the Borough. It is therefore considered sufficient in terms of ensuring the needs of all members of the community can be met.
- 7.21 Bloor Homes considers the existing housing stock within Stone to be balanced however recognises the current demand for smaller 2 and 3 bed properties across the Borough.
- 7.22 The Policy requires the provision of self or custom build plots, equivalent to 1% of all dwellings, within a number of major sites. As previously submitted Bloor Homes favours the identification of specific sites for such development, as this option would have a greater chance of ensuring that the needs of local people wishing to build their own homes are met. It is likely that a high percentage of those on the self/custom build register are not looking for sites within major housing development sites. It is recommended that these sites are specifically allocated as self-build/custom build housing sites within the Local Plan Review document.
- 7.23 If major housing allocations are required to provide self and custom build plots, any such plots which remain unsold should be allowed to revert to delivery through conventional means. The appropriate period for marketing should be reduced to 12 months to allow for continuity of build out.
- 7.24 Bloor Homes supports the efficient use of land, in accordance with National Planning Policy and Guidance and supports the approach to residential



densities to be considered on a site-by-site basis, having regard to surrounding prevailing densities and landscape setting

- 7.25 Due to the size of the site at Eccleshall Road, Stone and the lack of identified constraints, it is realistic to expect the delivery of an efficient scheme that could achieve a minimum average net density of 37-40dph. However, this would be achieved through the provision of character areas of varying density and would be reflective of the character of surrounding development, including committed development currently under construction to the east of the site, within the current housing allocation.

## 8. Design & Infrastructure Policies

- 8.1 Bloor Homes supports the preferred policies that are proposed to ensure the delivery of high quality development, supported by necessary infrastructure, delivered in a timely manner.

### Policy 34. Urban Design General Principles

- 8.2 The urban design general principles identified in Policy 34 are supported by Bloor Homes. Bloor Homes considers the policy provides an appropriate framework for creating high quality new communities in line with the National Design Guide, National Model Design Code and Manual for Streets.

### Policy 25. Architectural Design

- 8.3 Bloor Homes supports the approach to architectural design set out in Policy 35. It is noted that this Policy should be read in conjunction with Policies 24, 27 28 and 29 relating to residential development to which Bloor Homes has provided comments separately.

### Policy 36. Landscape Design

- 8.4 Bloor Homes promotes landscape led proposals and recognises the importance of the creation of new areas of public realm and landscaped areas in creating cohesive communities and development that responds to contextual sensitivities. Policy 36 is supported as sound.

### Policy 37. Infrastructure to Support New Development

- 8.5 Where new development generates a demand for new or improved infrastructure, Bloor Homes recognises that a reliable mechanism such as a planning obligation is necessary.
- 8.6 Any infrastructure should be necessary to make the development acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development.

## 9. Environmental Policies

- 9.1 Bloor Homes supports the suite of preferred policies that seek to balance the delivery of the appropriate level of growth whilst ensuring environmental protection and enhancement where necessary.

### Policy 41. Historic Environment

- 9.2 Bloor Homes supports the approach to the historic environment contained within Policy 41.

### Policy 42. Flood Risk

- 9.3 Bloor Homes supports proposed Policy 42 in respect of Flood Risk which is informed by an up-to-date Strategic Flood Risk Assessment Level 1 and is consistent with national policy.

### Policy 43. Sustainable Drainage

- 9.4 Bloor Homes broadly supports the approach to Sustainable Drainage outlined in Policy 43.

- 9.5 Bloor Homes supports the integration of blue and green infrastructure to create multifunctional spaces which can assist in delivering landscape, biodiversity and recreational benefits.

### Policy 44. Landscapes

- 9.6 Bloor Homes supports the requirement for Landscape and Visual Impact Assessments for developments likely to have a significant visual effect on existing landscape.

### Policy 46. Green & Blue Infrastructure Network

- 9.7 The importance of green and blue infrastructure is, unquestionably, important in delivering good design and ensuring that it reaches beyond the site linking to areas beyond. At the Issues and Options stage Bloor Homes suggested caution should be exercised in being too prescriptive as sites and their contexts will vary. Notwithstanding this, it is important that opportunities for linkages are maximised and clearly articulated, through an evidence-based approach which is then clearly shown on a policies map to provide certainty.

- 9.8 The general principles contained in Policy 46 (Para A) are supported in addition to the areas of Strategic Green Infrastructure Network identified. Bloor Homes

supports the identification of the Strategic Green Infrastructure Network within Stone.

- 9.9 As current drafted, the policy requires developments of 10 or more dwellings to contribute towards extending the green network by providing onsite publicly accessible open space to meet a standard of 32m<sup>2</sup> per person. In addition, equipped playspace is required on site for all developments providing 51 or more homes. Whilst these proposed standards appear reasonable, there needs to be recognition of a site's context and the existing provision of accessible open space or equipped play within the vicinity. If an existing, good quality play area is already in situ in close proximity to the site, it may be more appropriate to upgrade an existing facility rather than duplicate provision.
- 9.10 It should be noted that the initial Development Framework Plan for land at Eccleshall Road, Stone identifies a significant new green infrastructure network to incorporate a range of recreational activities, including equipped play, natural play and a network of new routes to encourage walking and cycling. Provision is in excess of the proposed standards contained within Policy 46.

#### **Policy 47. Biodiversity**

- 9.11 The Council's proposed approach to achieve a net gain of at least 10% in line with the Environment Act 2021 is noted. Any requirement for biodiversity net gain should be considered through the Stage 2 Viability Assessment and provisions should be put in place by Stafford Borough Council to allow off-site mitigation where necessary. This will be particularly important in respect of smaller development sites where opportunities or viability for on-site provision are not available.

#### **Policy 48. Cannock Chase SAC**

- 9.12 Bloor Homes notes further evidence in respect of Cannock Chase SAC, including a review of mitigation measures and visitor survey. This evidence has informed the current mitigation measures to address any impact arising from development within a 15km radius of Cannock Chase SAC. Policy 48 is supported.

#### **Policy 49. Trees**

- 9.13 Bloor Homes broadly supports draft Policy 49 which seeks to retain, integrate and minimise the risk of harm to trees of value, hedgerow and woodland. The policy position to retain or ensure the replacement of existing trees, hedgerows and woodland is supported where these have value.

## 10. Land at Eccleshall Road, Stone

- 10.1 Bloor Homes has an interest in approximately 25.74 hectares of land to the west of Stone, occupying an area of land between an existing housing allocation to the east and the M6 and safeguarded land associated with HS2 to the west. Eccleshall Road defines the boundary to the south of the site and a railway line, safeguarded land associated with HS2 and the floodplain associated with the Filly Brook beyond the northern boundary.
- 10.2 The site lies within site reference ST014 as identified within the Borough Council's Strategic Housing & Employment Land Availability Assessment (SHELAA) most recently published in 2022. This identifies the site as Available, achievable but not suitable due to the inclusion of the HS2 safeguarding buffer. It should be noted the site being promoted by Bloor Homes, excludes the HS2 safeguarded land.
- 10.3 The Site Selection Topic Paper confirms that ST014 has been subject to the site selection process and the Site Assessment Profile concludes that it is a 'Potential Site Option' however education capacity constraints and transport concerns would need resolving. Despite this, the Interim Sustainability Appraisal considers this site as a shortlisted housing site and whilst this Appraisal considered the site sequentially less preferable to the identified allocations within Stone, no significant showstoppers were identified, recognising that the landscape will be significantly impacted by HS2. Highways and education capacity issues were also noted.

### Education Concerns

- 10.4 Bloor Homes has commissioned EHP to prepare an Education Impact and Mitigation Assessment. This is included at **Appendix 4**.
- 10.5 EHP concludes that the site would generate a need for 72 first school education places and 57 middle school places if development delivered 478 homes in line with the SHELAA assumptions. The report concurs with the Stafford Borough Council position that the demand for first and middle school places arising from the site can be accommodated at a local first school following expansion of the school and at an existing middle school without the need for expansion. It should be noted the emerging proposal includes an area of land for a potential new First School.

10.6

10.7 In addition, EHP considers the site would generate a need for up to 43 high school education places utilising the SCC child yield methodology. The report identifies a number of conclusions:

- There could be a degree of flexibility on the main Alleyne's Academy site for it to be able to accommodate a higher pupil capacity than its current figure of 1,012 places if additional teaching space is added
- It is not currently appropriate for Staffordshire County Council to conclude that Alleyne's Academy cannot be expanded further on its existing main site unless a detailed feasibility study is undertaken and made available for scrutiny which would clearly indicate that potential further expansion of Alleyne's Academy is not possible.

10.8 Overall, EHP conclude, first and middle school places arising from the site can be accommodated and an option should be explored to increase high school places at Alleyne's Academy. At present there is no feasibility study to determine potential future expansion at Alleyne's Academy is not possible.

### Transport Concerns

10.9 Bloor Homes has commissioned mode to review the deliverability of a site ST014 from a highways and transport perspective. The current issues experienced at the Walton Roundabout (capacity and non motorised user severance) are well established and known to both the Staffordshire County Council (SCC) in their role as the Local Highway Authority (LHA) and Local Planning Authority (LPA). To date, previous applications within Stone and the surrounding area, have simply provided minor kerb realignments at the junction and have provided financial contributions which SCC has pooled but is yet to spend and nor has an overarching mitigation scheme been identified to date.

10.10 Attached as **Appendix 5** is a Technical Note that specifically considers the Walton Roundabout to demonstrate there is a workable solution at the junction that could address existing issues as well as providing comfort that future development associated with Land at Eccleshall Road, Stone could be accommodated on the highway network.

10.11 This could be achieved through the delivery of a new signalised roundabout scheme which significantly improves the current and predicted future year scenarios and provides a better than nil detriment to both non-motorised users and vehicles.

### Conclusion

10.12 Land at Eccleshall Road, Stone represents a suitable housing development option. Issues highlighted, relating to education and highways capacity can be addressed, as evidenced by further work undertaken by Bloor Homes.

#### Land at Eccleshall Road, Stone

10.13 The emerging proposals are set out in the accompanying Promotional Document attached at **Appendix 2** to this representation. The Promotional Document brings together the findings of the initial technical and environmental studies which have informed initial masterplanning proposals for land at Eccleshall Road, Stone.

10.14 Land at Eccleshall Road, Stone is located approximately 2 miles to the west of Stone Town Centre and 2.1 miles from Stone Railway Station located to the east of the site.

10.15 The site is bound by to the north by Filly Brook and an existing railway line, along with Stone Golf Club located further north. West of the site is open countryside and Micklow Farm House adjoins the western boundary. The B5026 known as Eccleshall Road is situated along the southern boundary of the site.

10.16 To the south and east, the site is bounded by committed development proposals that are currently under construction or recently built.

10.17 The site is sustainably located in relation to public transport, located within walking distance of bus routes, and Stone Railway Station located approximately 2.1 miles to the east providing links with the major cities of Manchester, Liverpool, Birmingham and London among others.

10.18 The site constitutes greenfield land located adjacent to the confines of the existing settlement boundary for Stone.

10.19 The initial Development Framework Plan produced is landscape led. The site provides an opportunity to provide approximately 575 to 630 dwellings, a potential new first school and a significant new green infrastructure network that provides an opportunity to deliver equipped play, natural play, community garden and a range of new habitats to support wildlife.

10.20 The proposal seeks to protect Micklow Woods and ensure seamless integration with development currently under construction to the east of the site.

10.21 Key Design Principles include:

- A primary site access via Eccleshall Road;

- Secondary streets serving clusters of development;
- Outward facing development providing natural surveillance over newly created public open space;
- Centralised public open space to blend seamlessly with neighbouring consented development providing a more coherent development;
- Green movement corridors providing foraging routes for wildlife and an enhanced ecology infrastructure;
- Cycle and pedestrian movement routes utilising the newly created green corridors;
- Possible cycle and pedestrian connections to neighbouring development;
- Potential location for 'first school' of up to 0.78 Ha;
- Utilised site low points for sustainable urban drainage;
- Maximum retention of existing green vegetation and incorporation of Sustainable Drainage Systems (SuDS);
- Potential location for a community garden for new and existing residents;
- Proposed landscape to provide transition on approach to Stone; and
- Proposed landscape structural enhancements to western boundary.

### *Availability*

- 10.22 The site is owned by a single private landowner. Bloor Homes has entered into an agreement with the landowner to promote the site for residential development with the option to acquire the site for development. The site is available.
- 10.23 The most recent Strategic Housing and Economic Land Availability Assessment (SHELAA), published in 2019, considers land off Eccleshall Road (site reference ST014) as available and achievable with an assumed yield of approximately 629 dwellings. The assumed yield aligns to the emerging Development Framework Plan prepared by Bloor Homes.

### *Suitability*



- 10.24 With regard to the suitability credentials of the site, it is located outside current settlement boundary but adjacent to the sustainable settlement of Stone and in proximity to public transport routes, services and facilities. Bloor Homes has provided further evidence at **Appendices 4 and 5** to demonstrate the constraints relating to education and highways, identified through the Council's site selection process, can be overcome.
- 10.25 Further evidence will be provided in respect of the nearby Site of Biological Importance, the Historic Environment Record and identified Landfill Buffer referenced within the SHELAA however, it is considered that all such matters can be addressed through a well-designed scheme and appropriate mitigation measures within the site. A number of Technical Reports have been commissioned to address these points and further information will be provided through the Local Plan Review process.
- 10.26 It is noted that the previous Strategic Housing and Economic Land Availability Assessment (SHELAA), published in 2019, considered land off Eccleshall Road (site reference ST014) as suitable. Bloor Homes concurs with this conclusion.

### Summary

- 10.27 Land at Eccleshall Road, Stone is a suitable and sustainable location for residential development and represents a deliverable proposition, being available now and providing every prospect that approximately 575 to 630 dwellings can be delivered. The suitability of the site is further detailed within the accompanying Promotional Document at **Appendix 2** and further evidence provided at **Appendices 4 & 5**. The proposal would make best use of existing infrastructure and provides the opportunity to deliver further facilities not limited to a new first school and a significant green infrastructure network.

## 11. Conclusion

- 1.1 This representation is made by Evolve Planning on behalf of Bloor Homes to the Stafford Local Plan Review, Preferred Options (Regulation 19). This representation relates to land at Eccleshall Road, Stone, which is promoted as an available, achievable and suitable housing allocation within the Tier 2 sustainable settlement.
- 11.1 Bloor Homes raise significant concerns with the intended approach to determining the quantum and spatial distribution of housing growth identified through the Preferred Options consultation document.
- 11.2 The Preferred Option for housing growth aligns to Scenario D which is not supported by Bloor Homes as it projects the lowest housing growth of all four economic growth scenarios tested. If the Council pursues the preferred strategy for employment an uplift in the level of homes delivered is required to ensure a balance between increased jobs and working age population to support these jobs.
- 11.3 Bloor Homes supports the commitment of Stafford Borough Council to providing a contribution to assist in meeting these unmet housing needs. However, the proposed contribution of 2,000 homes should be explored and reviewed through the ongoing Duty to Cooperate with LPAs in light of most the recent evidence in respect of the shortfall in housing provision in neighbouring HMAs.
- 11.4 Meecebrook Garden Community should not be highlighted as the intended location for meeting housing needs from other authorities. Instead, any appropriate uplift provided to meet unmet needs from neighbouring authorities should form part of a comprehensive distribution of growth across the Borough within an integrated spatial development strategy.
- 11.5 Bloor Homes objects to the proposed spatial distribution of growth including the focus of 3,000 homes to a new Garden Community at Meecebrook. Representing over 50% of the new supply sources, growth is being focused to an isolated location at Meecebrook at the expense of growth provided to Stone and the Larger Settlements. This not only provides an unsustainable distribution of housing growth but undermines the delivery of the Local Plan through over reliance on delivery of this Garden Community.
- 11.6 A new Garden Community at Meecebrook would require significant investment in new infrastructure to create a sustainable community with a good degree of self-containment. The Council's own evidence highlights potential risks of viability and evidence commissioned by Bloor Homes and others has highlighted

the deliverability of a new railway station at Meecebrook is minimal at best, with the merits and deliverability carrying no weight in the absence of a review and validation by Network Rail and wider rail industry stakeholders. Lack of a new railway station at Meecebrook would completely undermine the sustainability merits of this proposed Garden Community.

- 11.7 Bloor Homes does not agree that the identified sources of supply will provide a 10% supply buffer above the preferred minimum requirements due to the unrealistic lead in times and delivery rates assumed for Meecebrook Garden Community. Bloor Homes contends that evidence provided by Stafford Council would only support the delivery of 1,120 dwellings within the plan period. This is significantly less than the 3,000 dwellings currently assumed by the Council and represents a level of development that would fail to support key infrastructure requirements to allow for an acceptable level of self-containment and inherent sustainability within a plan period to 2040.
- 11.8 In light of the above, Bloor Homes fundamentally disagrees with the statement contained within the Housing & Employment Land Requirement Topic Paper that *“the rural peripheries of Stafford and Stone, have inferior sustainable transport links”* to Meecebrook and therefore growth in these areas *“would be less likely to contribute to the achievement of sustainable development.”*
- 11.9 Instead, Bloor Homes considers the spatial strategy should focus development to sustainable extensions to the top-tier established, settlements as a primary driver of growth, including within Stafford, Stone and the Larger Settlements. Consideration of a Garden Community should be reserved for a future local plan review.
- 11.10 Land at Eccleshall Road, Stone is a suitable and sustainable location for residential development and represents a deliverable proposition, being available now and providing every prospect that approximately 575 to 630 dwellings can be delivered. The suitability of the site is further detailed within the accompanying Promotional Document at **Appendix 2** and further evidence provided at **Appendices 4 & 5**. The proposal would make best use of existing infrastructure and provides the opportunity to deliver further facilities not limited to a new first school and a significant green infrastructure network.

# APPENDIX 1

## Site Location Plan

# APPENDIX 2

## Promotional Document

# APPENDIX 3

## Meecebrook New Passenger Station Review

# APPENDIX 4

## Education Impact & Mitigation Assessment

# APPENDIX 5

## Walton Roundabout Study









# ECCLESHALL ROAD STONE

## PROMOTIONAL DOCUMENT

Prepared by Pegasus Group on behalf of Bloor Homes (Midlands) Limited

December 2022 | P19-1831





Offices throughout the UK and Ireland.

Prepared by: Pegasus Group Ltd  
Prepared on behalf of: Bloor Homes (Midlands) Limited.  
Date: December 2022  
Project code: P19-1831  
Document Ref: P19-1831\_04 REV A  
Contact: James Walch

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## 01

## INTRODUCTION

## BLOOR HOMES

- 1.1 Established in 1962, Bloor Homes is one of the UK's largest privately owned house building companies, completing in excess of 3,500 new homes each year. The Company has considerable experience in promoting and delivering strategic residential development sites across the country, ranging in size and complexity from those of around 50 dwellings to substantial mixed-use urban extensions of over 5,000 dwellings. The proposed scheme at Land off Eccleshall Road, Stone would be delivered by the Midlands Division of Bloor Homes.

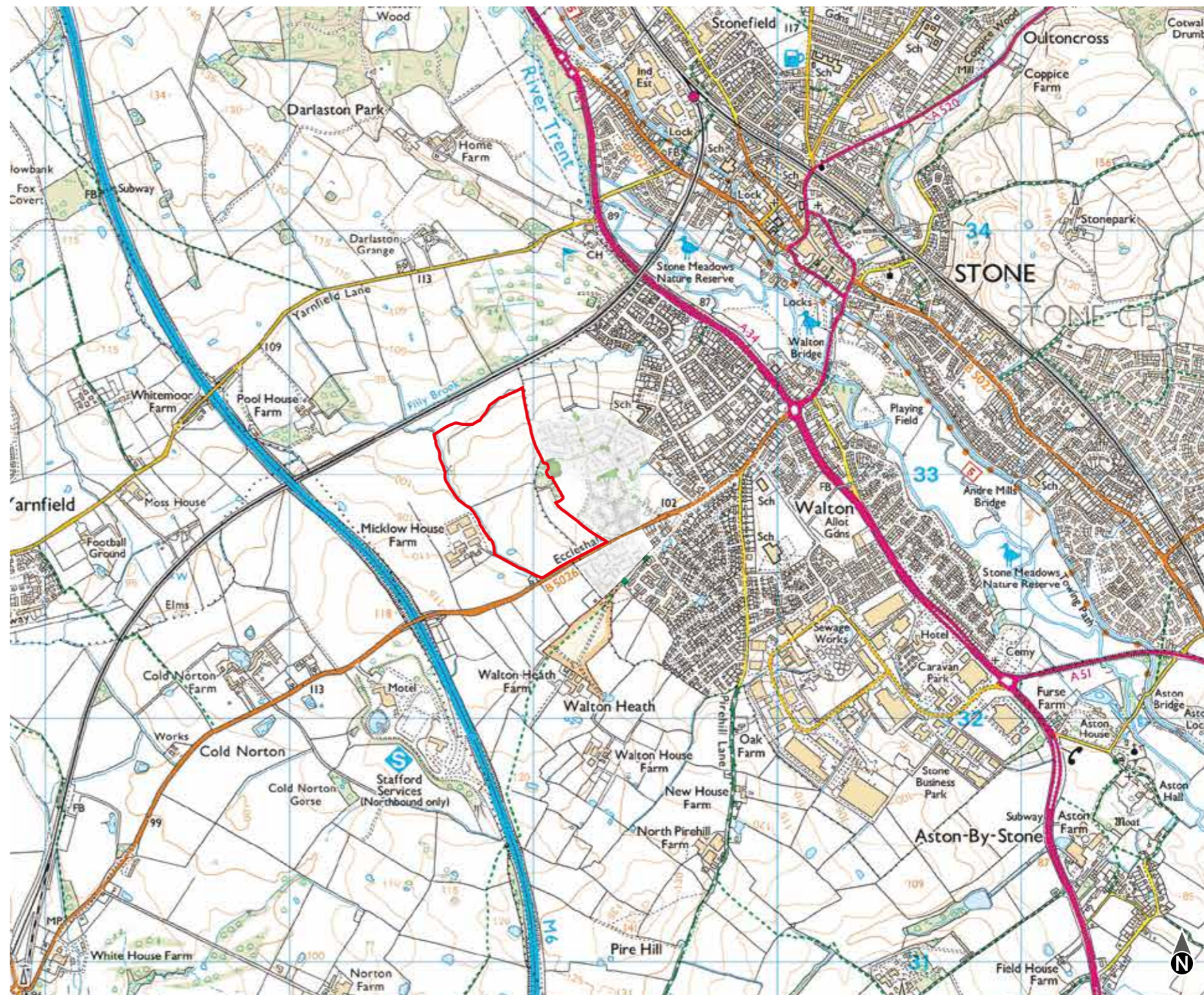
## STAFFORD BOROUGH COUNCIL

- 1.2 Stone is identified as a sustainable settlement within the current Plan for Stafford Borough (adopted in June 2014) second only to Stafford. Stone is a focus for the provision of 10% of the Borough's new homes growth between 2011 and 2031.
- 1.3 Stafford Borough Council has commenced work on a review of the adopted Local Plan. The Local Plan Review provides an opportunity for the Council to comprehensively review the vision, strategic objectives, development requirements, spatial development strategy and policies for shaping detailed development proposals. Land at Eccleshall Road, Stone is being promoted by Bloor Homes as a suitable, available, deliverable and achievable site option through the Local Plan Review process.

## PURPOSE OF THE DOCUMENT

- 1.4 This promotional document seeks to bring together the initial technical and environmental studies that have been undertaken by Bloor Homes' consultant team and explains the initial masterplanning proposals for land at Eccleshall Road, Stone. What is presented in this document is not intended to be a fully worked-up scheme but has been prepared for illustrative purposes to be used as the basis for engagement with the key stakeholders, including the Council, through Local Plan Review process.

Site Location • Not to scale



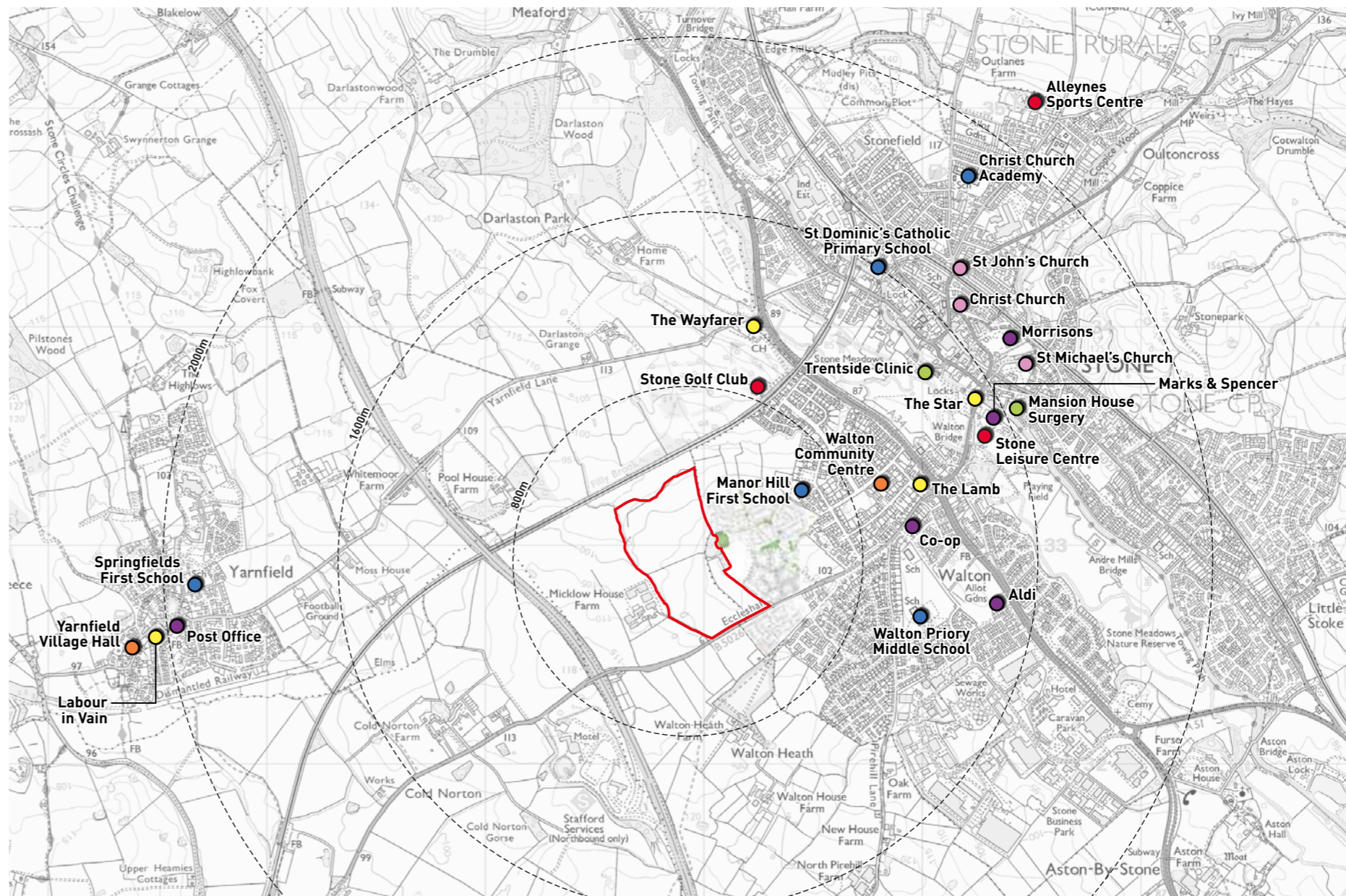
# 02

## THE DEVELOPMENT SITE

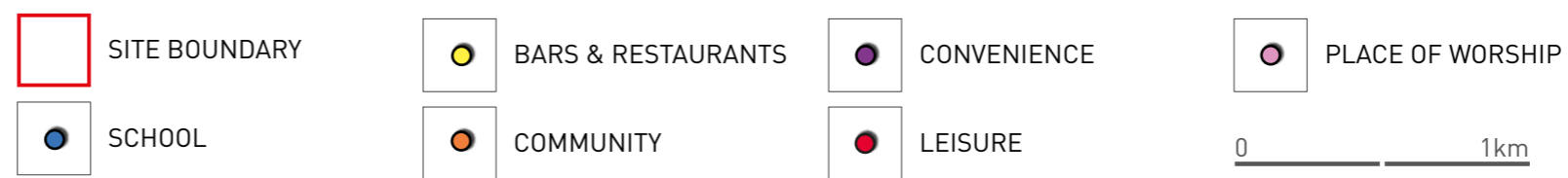
### STONE

- 2.1 Stone is an old market town in Staffordshire which serves a significant rural hinterland. Situated about 7 miles (11 km) north of Stafford, and around 7 miles (11 km) south of the city of Stoke-on-Trent, it is the second town in the Borough's settlement hierarchy after Stafford itself. From a national perspective it is located almost midway between Birmingham and Manchester.
- 2.2 Stone consists of two distinct areas bisected by the A34, a dual carriageway and major trunk route, and the River Trent which lies slightly east of but parallel to the road. To the west of the river is Walton, a predominantly residential area with housing development occurring in the main over the last 50 to 60 years. The town's main Business Park is also located here to the west.
- 2.3 To the east lies the town centre and the older pre-Victorian and Victorian residential areas.
- 2.4 The site is located within Walton to the west of the settlement, which comprises a wide range of services and facilities.

Local facilities • Not to scale



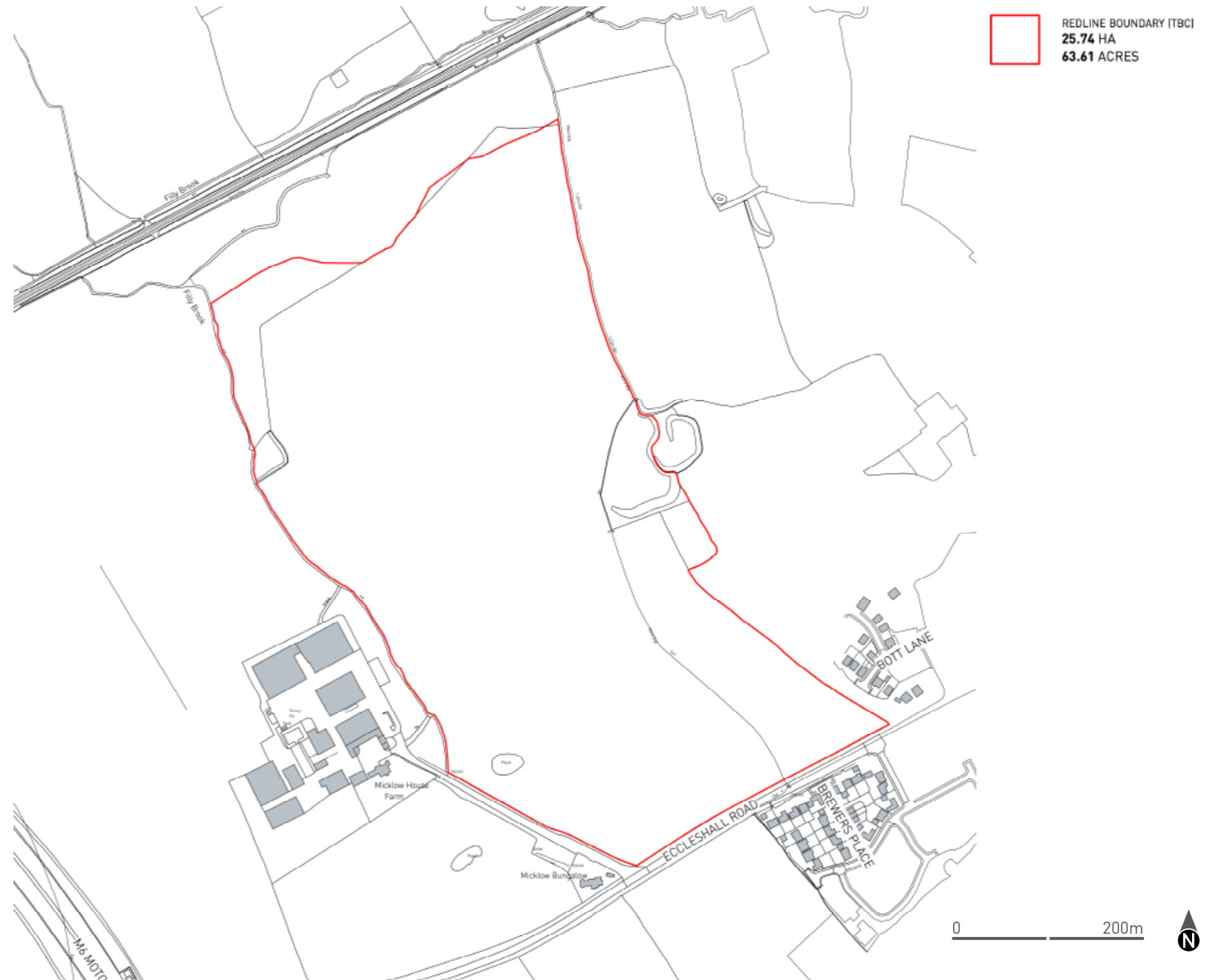
### LEGEND



## THE SITE

- 2.5 The site known as Land at Eccleshall Road extends over approximately 25.74 hectares, approximately 2 miles to the west of Stone Town Centre and 2.1 miles from Stone Railway Station located to the east of the site.
- 2.6 The site is bound by to the north by Filly Brook and an existing railway line, along with Stone Golf Club located further north. West of the site is open countryside and Micklow Farm House adjoins the western boundary. The B5026 known as Eccleshall Road is situated along the southern boundary of the site.
- 2.7 To the south and east, the site is bounded by committed development proposals that are currently under construction.
- 2.8 The site is sustainably located in relation to public transport, located within walking distance of bus routes, and Stone Railway Station located approximately 2.1 miles to the east providing links with the major cities of Manchester, Liverpool, Birmingham and London among others.
- 2.9 The site constitutes greenfield land located adjacent to the confines of the existing settlement boundary for Stone.

Site boundary • 1:5000



## 03

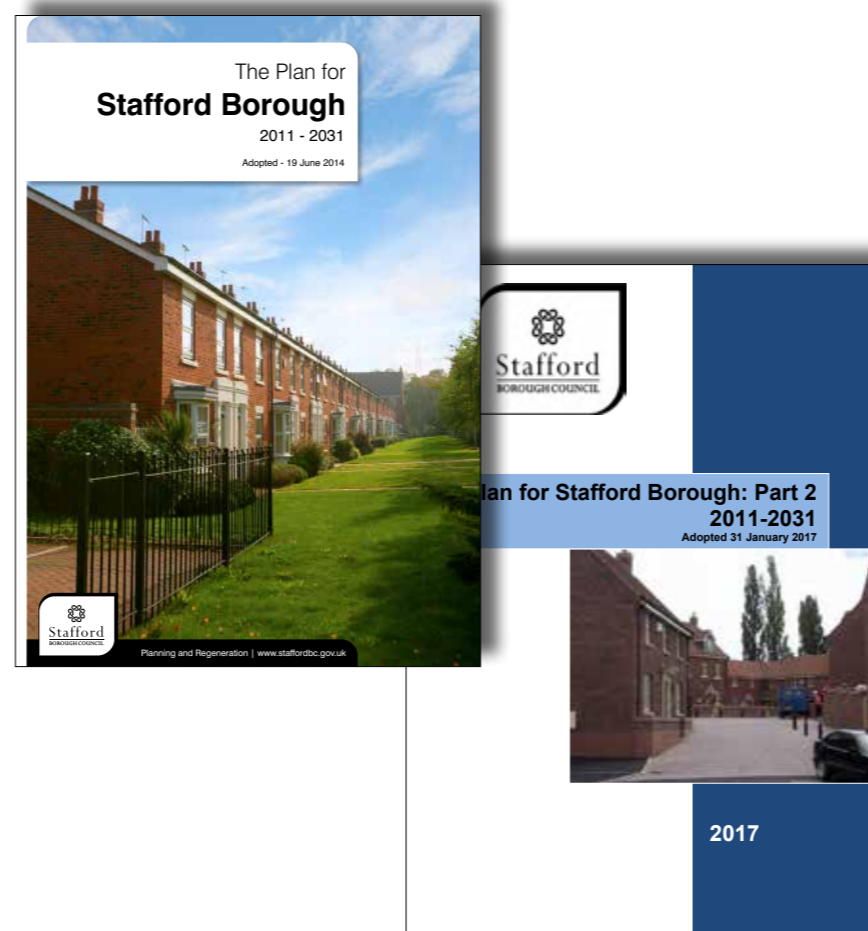
# PLANNING CONTEXT

## NATIONAL PLANNING POLICY

- 3.1 The latest National Planning Policy Framework (NPPF) was introduced in July 2021. The Government recognises that the planning system should be genuinely plan-led, with succinct and up-to-date local plans providing a positive vision for each District; a framework for addressing housing needs and other economic, social and environmental priorities that span a minimum 15 year period from adoption.
- 3.2 The NPPF requires local authorities to identify a sufficient amount and variety of land, that can come forward where it is needed, to support the Government's aim of significantly boosting the supply of homes. To determine the number of homes needed a local housing need assessment is required, conducted using the 'standard method.' This standard method identifies a local housing need for Stafford Borough of 391 dwellings per annum, including an uplift to take account of market signals and affordability. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account.

## CURRENT DEVELOPMENT PLAN

- 3.3 The Development Plan for Stafford Borough currently comprises the adopted Plan for Stafford Borough 2011 to 2031 (adopted June 2014) and the Plan for Stafford Borough Part 2 (adopted January 2017).
- 3.4 At the local level, a 'made' Neighbourhood Plan forms part of the development plan within the Town of Stone.



## LOCAL PLAN REVIEW

- 3.5 Stafford Borough Council has commenced work on a review of the adopted Local Plan. The Local Plan Review provides an opportunity for the Council to comprehensively review the vision, strategic objectives, development requirements, spatial development strategy and policies for shaping detailed development proposals. The review process will also ensure consistency with the new National Planning Policy Framework (NPPF), which seeks a requirement for local planning authorities to keep their Local Plan up to date by undertaking a review at least every five years.
- 3.6 The most recent Strategic Housing and Economic Land Availability Assessment (SHELAA), published in 2022, considers land off Eccleshall Road (site reference ST014) as having capacity for 629 dwellings. The SHELAA considers the site to be available and achievable. The SHELAA determines the site is not suitable as it is intersected by the HS2 safeguarding buffer. Bloor Homes has removed the HS2 safeguarded land from the site being promoted..
- 3.7 With regard to the availability credentials of the site, Bloor Homes can confirm that they have an agreement in place with the landowner to promote the site for residential-led development through the Local Plan Review process. Therefore, the site is available for development.
- 3.8 With regard to the suitability credentials of the site, it is located outside current settlement boundary but adjacent to the sustainable settlement of Stone and in proximity to public transport routes, services and facilities. Further evidence will be provided in respect of the nearby Site of Biological Importance, the Historic Environment Record and identified Landfill Buffer referenced within the SHELAA however, it is considered that all such matters can be addressed through a well-designed scheme and appropriate mitigation measures within the site. A number of Technical Reports have been commissioned to address these points and further information will be provided through the Local Plan Review process.



## 04

# LANDSCAPE AND VISUAL

## POLICY CONTEXT

- 4.1 Current policies relevant to landscape and visual matters include: Policy N4 The Natural Environment & Green Infrastructure and Policy N8 Landscape Character.
- 4.2 Policy N4 sets out that the Borough's natural environment will be protected, enhanced and improved by a series of measures including ensuring new development includes appropriate mitigation.
- 4.3 It states that local landscape and heritage features should be conserved and enhanced and inform the master planning and design of new neighbourhoods; be positively managed to conserve and enhance their significance and contribution to the character of the landscape; and be accessible to local communities for leisure and recreation.
- 4.4 It also states that new developments should be set within a well-designed and maintained attractive green setting and provide a variety of spaces to meet the needs of people and nature.
- 4.5 Policy N8 sets out that development proposals must be informed by, and be sympathetic to, landscape character and quality. The policy also states that development should demonstrate that proposals with landscape and visual implications, should protect, conserve and, where appropriate, enhance:

***"a. The elements of the landscape that contribute to the local distinctiveness of the area (including heritage assets, cultural character and biodiversity);***

***b. Historic elements of the present-day landscape that contribute significantly to landscape character;***

***c. The setting and views of or from heritage assets, including conservation areas, Registered Parks and Gardens, Scheduled Monuments, Listed Buildings and assets identified in the Historic Environment Record;***

***d. The locally distinctive pattern of landscape elements such as woodland, streams, hedgerows, trees and field boundaries."***

- 4.6 The policy sets out that new development should reinforce and respect the character of the settlement and the landscape setting, through the design and layout that includes use of sustainable building materials and techniques that are sympathetic to the landscape.

## NATIONAL LANDSCAPE CHARACTER

- 4.7 The site is located within National Character Area Profile 61: Shropshire, Cheshire and Staffordshire Plain, as published by Natural England (2014). The Shropshire, Cheshire and Staffordshire Plain National Character Area (NCA) is an expanse of flat or gently undulating, pastoral farmland.

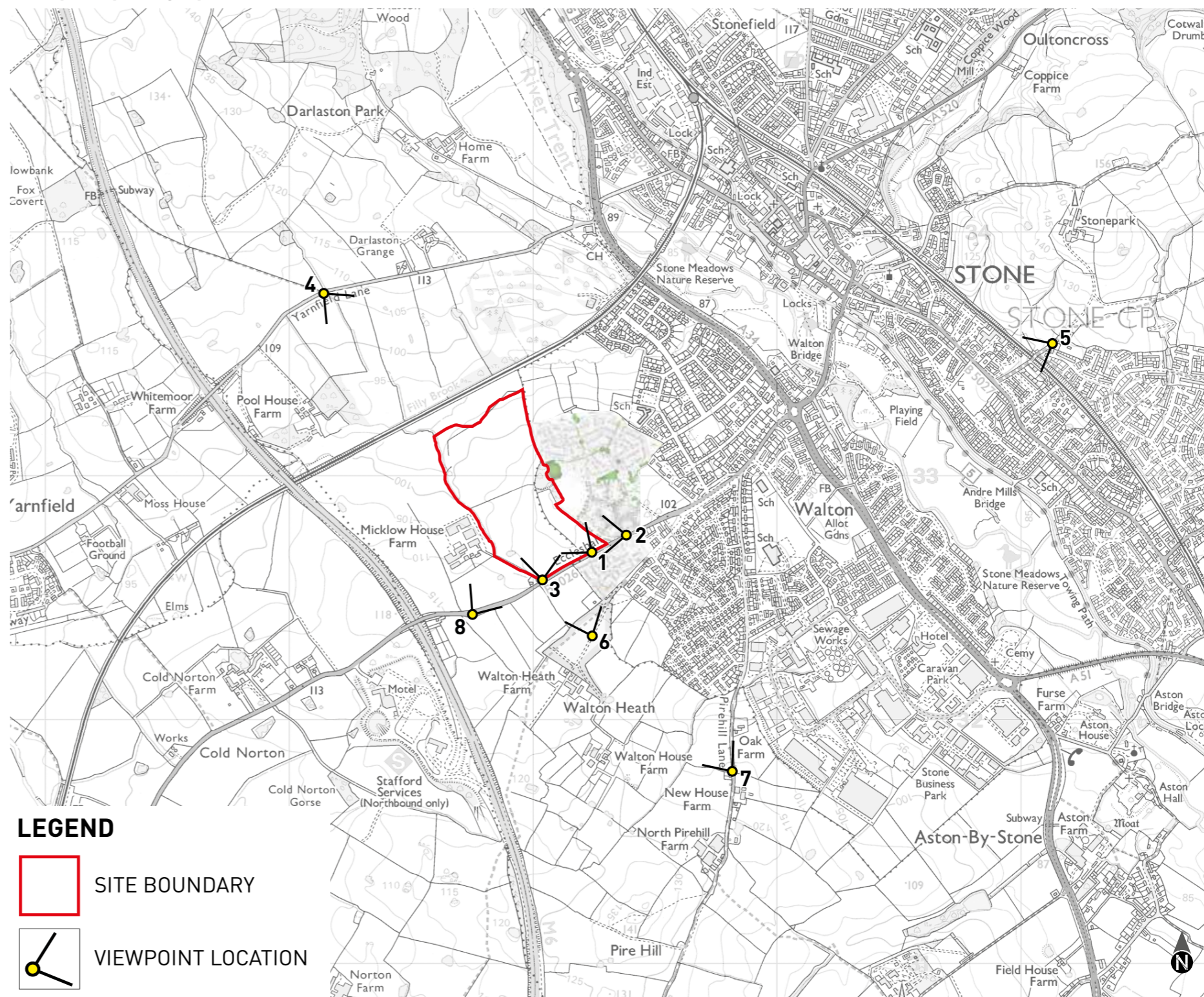
## COUNTY LANDSCAPE CHARACTER

- 4.8 The site is located within the 'Settled Farmlands' landscape character type, as identified in the Staffordshire Landscape Character Assessment. This landscape character type is described as:
- "...a landscape of mixed arable and pastoral farmland in which farming practices vary from low intensity, still retaining an intact ancient pattern of hedgerows and hedgerow trees, to areas of more intensively farmed arable and improved pasture."***
- 4.9 Its sets out that:
- "This landscape has a very rural feel, with the small winding country lanes linking the large numbers of traditional style red brick farms and old settlements. Industrial and commuter development, however, are now generally impacting on this character quite strongly. General decline, both of settlement pattern and landcover elements, is resulting in long term irreversible changes to the overall character of the landscape."***
- 4.10 Those factors considered to be critical to landscape character and quality are:
- "...the loss of characteristic landscape features, the poor condition of those features that remain, and the relatively poor survival of characteristic semi-natural vegetation (i.e. ancient woodland and hedgerows, semi-natural grasslands and riparian and wetland vegetation)."***
- 4.11 The published character assessment also sets out 'landscape restoration' policy objectives for this area. The site and its immediate context is not however located within either an 'area of highest landscape sensitivity' or 'landscape at risk of rapid loss of character and quality'.

## VISUAL AMENITY

- 4.12 A series of photographic viewpoints have been taken that are representative of visual receptors in the area. These photographs illustrate the views towards the site in the context of the surrounding landscape.
- 4.13 Overall, views towards the site are generally limited to the local context by the mature network of vegetation, including woodlands and hedgerows associated with field boundaries, combined with the physical boundary of the M6 motorway corridor to the west, which is also vegetated.
- 4.14 At a local level, there are views of the site from Eccleshall Road itself and from the residential settlement edge of Stone. In local views, the site is typically seen in the context of existing and emerging new residential development as the allocated housing site to the east continues to be built out. This also includes recently built properties at Sweepers Avenue to the south of the site.
- 4.15 There are middle distance views to the site from more elevated areas to the south, for example from Walton Heath open access land and footpath; and from a byway along Pirehill Lane. Views from further south are limited by the undulating topography of the landscape to the south-west of Stone, which includes Pire Hill.
- 4.16 From the north there are middle distance views from Yarnfield Lane looking across the Filly Brook valley to the rising topography of the valley side, including the site. Views from further north are limited by the combination of undulating topography and vegetation, including large woodland blocks such as that at Darlaston Park.
- 4.17 From the west, views towards the site are limited by the M6 motorway corridor which passes through the landscape west of the site. The motorway is in cutting near Micklow House Farm, is at grade further north and passes over the railway line to the north-west of the site. The motorway corridor is well vegetated in this location.
- 4.18 From the east, views are generally limited by the settlement pattern of Stone, although there are some potential longer distance views towards the site from higher ground north-east of Little Stoke.

Viewpoint photograph locations · Not to scale





1  
View looking north-west towards the site from Eccleshall Road



2  
View looking east towards the site from Eccleshall Road



3  
View looking north across the site from the boundary hedgerow along Eccleshall Road



4  
View looking south-east from Yarnfield Lane



View looking south-west from Pingle Lane



View looking north-west from Common Lane



View looking looking north-west from Pirehill Lane



View looking north-east towards the site from Eccleshall Road

## LANDSCAPE ANALYSIS

- 4.19 The constraints and opportunities for the site and its surrounding landscape context have been identified following the review of baseline information on landscape and visual matters.
- 4.20 The constraints for the site are considered to be:
- Albeit relatively limited, the local PROW network (providing recreational opportunities for potential high sensitivity visual receptors); and
  - The relationship between the site and surrounding countryside, including its position on the southern slope of a small valley (Filly Brook) and the requirement to keep development away from the site's high point to reduce potential visual impact; and
  - The existing hedgerow and tree network, including a small woodland copse along the eastern boundary of the site, and the requirement for appropriate setbacks to retain and protect it.
- 4.21 Landscape and visual opportunities can be summarised as follows:
- The site itself is not subject to any statutory landscape planning designations;
  - The physical and visual relationship of the site to the existing and emerging settlement edge, including the backdrop of new housing development in local views towards the site;
  - The presence of the M6 motorway corridor which acts as a detractor, and the future baseline scenario of the High Speed 2 rail line which will occupy land to the west of the site, reducing the susceptibility of the landscape at a local level;
  - The presence of mature vegetation across the local landscape including hedgerows, hedgerow trees, woodland associated with the stream valley to the north and some woodland blocks, in combination with the undulating landform, helps to minimise the visual envelope of the site and contributes to the capacity of the site to accommodate development; and
  - Existing vegetation throughout the site itself, including hedgerows and a small woodland copse, providing opportunities to enhance this through a comprehensive landscape strategy.

## LANDSCAPE CAPACITY

- 4.22 In relation to landscape and visual matters and as set out in the Guidelines for Landscape and Visual Impact Assessment (3rd Edition), landscape susceptibility is the ability of a landscape to accommodate change without undue consequences for the maintenance of the baseline situation. Different types of development can affect landscapes in different ways; therefore, landscape susceptibility is specific to the type of development proposed (i.e. in this case, residential use).
- 4.23 In terms of the susceptibility of the site and its immediate landscape context, local landscape character is influenced predominantly by a combination of transport corridors including the railway line and M6 motorway, as well as the B5026 Eccleshall Road (the main route into and out of the settlement on this edge of Stone); and the settlement edge itself, including emerging development to the east of the site and recently built development to the south. Local vegetation patterns include a strong hedgerow and hedgerow tree network and some woodland blocks.
- 4.24 Whilst the topography of the site itself on the southern slope of the Filly Brook stream valley allows middle distance views from the north, the landform of the wider context in combination with woodland blocks, built form and field boundary vegetation means that the visual envelope of the site is limited.
- 4.25 The site and its immediate context are also influenced by extensive (and future) reference to the type of development proposed (i.e. new housing) to the east and south of the site. The presence of the M6 motorway corridor as a detracting feature, and the future baseline scenario of the High Speed 2 rail line which will occupy land to the west of the site, also has an influence.
- 4.26 Elements such as hedgerows and trees can be addressed by appropriate stand offs between proposed built form and vegetation. Therefore, opportunities are available to retain these landscape elements where possible as part of a scheme, reducing susceptibility; there are also opportunities for the creation and enhancement of new green infrastructure and landscape planting which would be beneficial to the local landscape character and this would also reduce susceptibility.
- 4.27 Overall, it is considered that in relation to the matters described above, the site and its immediate context (i.e. the local landscape character) is generally of low susceptibility in landscape terms to the type of development proposed. It is considered therefore that it retains capacity for development in landscape and visual terms.

## LANDSCAPE & VISUAL STRATEGY

4.28 The key elements which should be incorporated into a landscape strategy for the site are summarised as follows.

### DEVELOPMENT ENVELOPE

4.29 The development envelope is influenced by the landscape and visual constraints and opportunities described earlier in this report.

4.30 To the north the envelope is defined by an offset to the boundary with the railway line and the existing green infrastructure (including hedgerows and a tributary to Filly Brook). Here, the sites' low point will provide drainage and attenuation.

4.31 To the west the development envelope is defined by an offset to the existing boundary vegetation to allow for additional structural landscape planting. This will enhance the existing landscape framework in order to provide screening and filtering of views both into the site from the wider landscape and some amenity protection both from the M6 motorway corridor and from the HS2 rail line for residents of the proposed development.

4.32 To the east the development envelope is influenced by the woodland copse, which is a distinct landscape feature on the site, and the rising topography of the site which reaches ca. 115-120m AOD along its eastern boundary. As a result, the development envelope is set broadly below the 115m contour line to reduce potential visual impacts and create new public open space that will connect seamlessly with that consented on the allocated site to the east. The proposals also allow for a potential local park and play space at the 120m high point, where views to the surrounding landscape will be retained.

4.33 To the south, the development envelope is influenced by views on the approach into the settlement, and as such it is set back from the south-western corner of the site. A proposed 'frontage' landscape treatment will help to filter and soften views of new housing along this edge.

## STRATEGY FOR EXISTING VEGETATION

4.34 Around any potential development envelope, consideration will be given to the existing vegetation (including trees, hedgerows and hedgerow trees). Where possible these landscape elements will be retained and integrated.

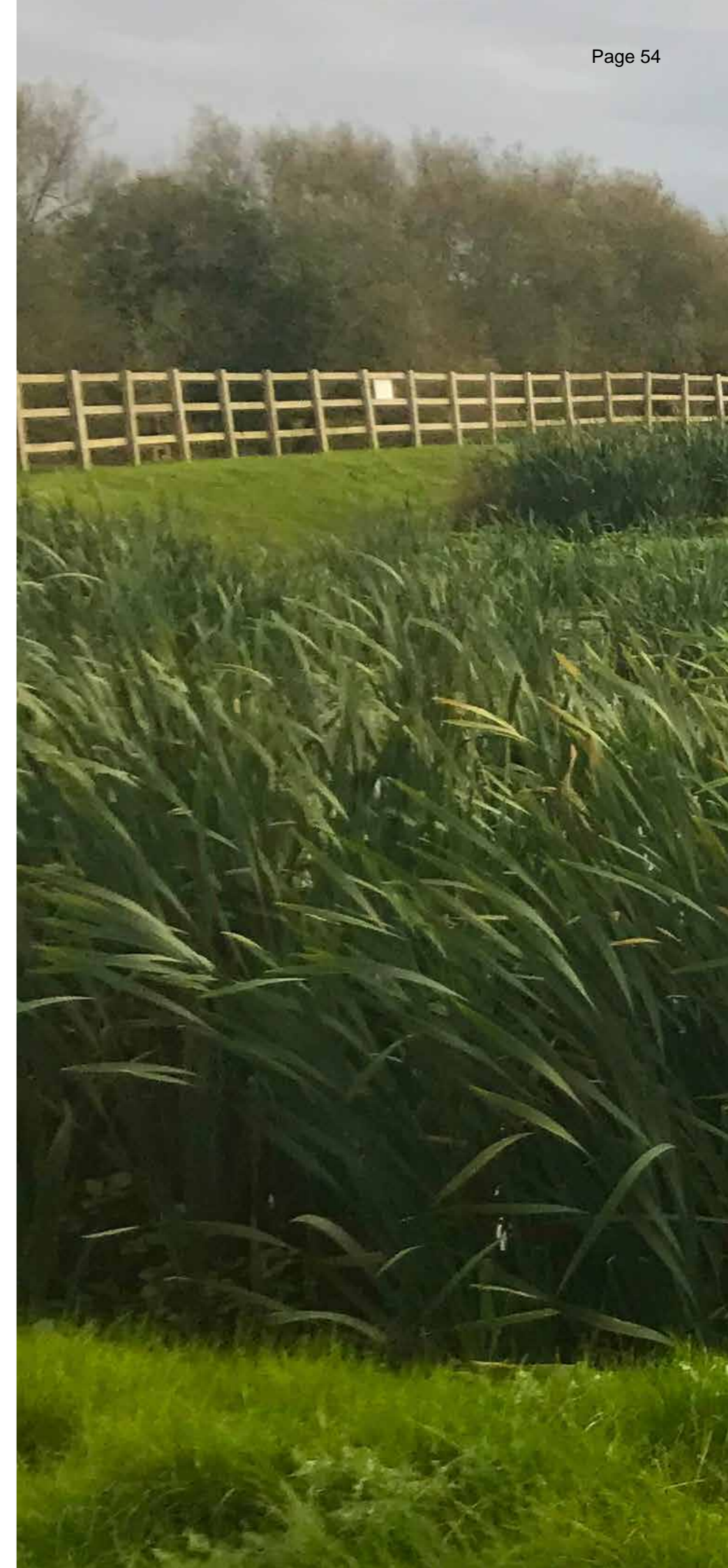
4.35 Where existing vegetation is retained this will be subject to appropriate maintenance and management in order to conserve and enhance its structure and condition. Whilst not primarily a landscape and visual matter, the retention and management of vegetation, along with proposed landscape planting, will have benefits for biodiversity and ecology.

## GREEN INFRASTRUCTURE & OPEN SPACE

4.36 The retained areas of vegetation and new infrastructure planting (as described above) would help ensure that the built form of a proposal would be contained as much as possible in a robust and diverse framework of green infrastructure. A strategy for retaining existing vegetation combined with proposals for extensive landscaping would result in a landscape context for any future proposals which show a variety of stages of establishment and maturity. This would enhance the quality of a proposal and help to integrate the site with the local landscape character.

## LANDSCAPE SCHEME & DETAILED DESIGN

4.37 All proposed landscape mitigation would be subject to a high-quality detailed landscape scheme that will ensure that the functions of the landscape components are delivered; this will also reflect positively on the design quality of the proposed development as a whole and allow any new development to tie in and complement the emerging new residential edge to the east. At detailed design the selection of species for trees and woodland will refer to native species as well as those present in the context of the local landscape.







## 05

## EMERGING PROPOSALS

## SITE &amp; CONTEXTUAL CONSIDERATIONS

## Access

- 5.1 At present there are no access points into the site along the southern boundary with Eccleshall Road. A pedestrian footway to Stone is planned along northern side of Eccleshall Road associated with the housing allocation currently under construction. This will fall approximately 65m short of the south eastern extent of the site, however the presence of a generous grass verge provides opportunity for this to be extended. A pedestrian footway is available to the south of Eccleshall Road from Horn Lane. No public rights of way cross the site itself.

## Landscape

- 5.2 The site is located outside of the Green Belt and comprises of three fields, each marked by internal hedgerows and a number of mature trees. Views towards the site are generally limited to the local context by the mature network of vegetation, including woodlands and hedgerows associated with field boundaries, combined with the physical boundary of the M6 motorway corridor to the west, which is also vegetated. At a local level the site is typically seen in the context of existing and emerging new residential development as the allocated housing site to the east continues to be built out.

## Ecology

- 5.3 Field boundaries and perimeter edges are generally defined by hedgerows. These, together with hedgerow trees, two small tree groups to the west of the site and a proportion of Micklow Wood to the eastern boundary are assumed to be likely of most ecological sensitivity. Micklow Wood, centrally located, along the eastern boundary is recognised as a Site of Biological Importance (SBI). The initial Development Framework Plan offsets new development from the SBI and the majority of the other features/ areas and significantly compensates for those which are lost.
- 5.4 The site lies within a 15km buffer associated with Cannock Chase Special Area of Conservation (SAC). An existing Cannock Chase SAC mitigation strategy requires financial contributions towards projects within Cannock Chase to mitigate recreational pressures.

## Heritage

- 5.5 The site is not located within or adjacent to a Conservation Area. In addition, there are no listed buildings within or within the vicinity of the site. It is recognised that the site lies within a Historic Environment Record Area (HER) relating to an area of water meadow.

## Flood Risk

- 5.6 Environment Agency mapping confirms the site falls entirely within Flood Zone 1 and suggests that far western area of the site is the most susceptible to surface water flooding.

## Topography

- 5.7 Site low points have been estimated and are assumed to be located towards the north and west of the site. Site topography is not considered to pose a significant constraint to development.

## Land Uses

- 5.8 Agricultural land extends to the north, west and south-west of the site. A recently constructed residential development is located to the south east of the site to the south of Eccleshall Road and further residential development is currently being constructed by a number of housebuilders to the east of the site. The site excludes all land safeguarded for HS2.

## Utilities and services

- 5.9 None known or taken into account at this stage.

## INDICATIVE PROPOSAL

- 5.10 The initial Development Framework Plan produced is landscape led. The site provides an opportunity to provide approximately 575-630 dwellings (at between 37 and 40 dwellings per net hectare), a potential new first school and a significant new green infrastructure network that provides an opportunity to deliver equipped play, natural play, community garden and a range of new habitats to support wildlife. The proposal seeks to protect Micklow Woods and ensure seamless integration with development currently under construction to the east of the site.

## Key Principles

- Primary site access achieved via Eccleshall Road;
- Primary vehicular movement, providing access to wider movement infrastructure;
- Secondary streets serving clusters of development;
- Outward facing development providing natural surveillance over newly created public open space;
- Centralised public open space to blend seamlessly with neighbouring consented development providing a coherent scheme with strategic centralised greenspace;
- Green movement corridors providing foraging routes for wildlife and an enhanced ecology infrastructure;
- Cycle and pedestrian movement routes utilising the newly created green corridors;
- Possible cycle and pedestrian connections to neighbouring development;
- Safeguarded land for HS2 development to north and west of site;
- Potential location for 'first school' of up to 0.78 Ha;
- Utilised site low points for Sustainable Drainage (SuDS);
- Maximum retention of existing green vegetation;
- Location for potential community garden for new and existing residents;
- Potential location for community orchard for new and existing residents;
- Proposed frontage landscape on approach to Stone; and
- Proposed landscape structural enhancements to western boundary.



**LEGEND**

-  SITE BOUNDARY (TBC)  
25.74 HA  
63.61 ACRES
-  PROPOSED RESIDENTIAL DEVELOPMENT PARCELS  
NDA 15.78 HA / 39.00 ACRES  
UP TO 630 DWELLINGS (AT 40 DPH)
-  POTENTIAL SITE ACCESS  
VIA ECCLESHALL ROAD (TBC)
-  EXISTING PRIMARY INFRASTRUCTURE
-  PRIMARY MOVEMENT ROUTE
-  SECONDARY MOVEMENT ROUTE
-  GRASCRETE EMERGENCY ACCESS ROAD
-  POTENTIAL EMERGENCY ACCESS POINT  
VIA ECCLESHALL ROAD (TBC)
-  POTENTIAL PEDESTRIAN/CYCLE ROUTES  
WITHIN DEVELOPMENT
-  POTENTIAL FLOODING FOR RIVERS AND SEAS  
E.A 26.09.19
-  EXISTING VEGETATION
-  PROPOSED LANDSCAPE STRUCTURAL ENHANCEMENTS  
TO WESTERN BOUNDARY
-  PROPOSED PLANTING
-  PROPOSED "FRONTAGE" LANDSCAPE ON APPROACH
-  ORNAMENTAL PLANTING
-  SUSTAINABLE URBAN DRAINAGE (TBC)
-  SAFEGUARDED LAND FOR FUTURE HS2 LINE  
[BOUNDARY TAKEN FROM HIGH SPEED RAIL (WEST MID  
MIDLANDS - CREWE)  
REF: CT-06-222-RL / CT-06-222
-  KEY FOCAL SPACES
-  LONG DISTANCE VIEWS TO WIDER CONTEXTUAL  
LANDSCAPE
-  POTENTIAL LOCATION FOR 'FIRST SCHOOL' (TBC)
-  POTENTIAL LOCALLY EQUIPPED AREA OF PLAY
-  AREA OF NATURAL PLAY
-  POTENTIAL POINTS OF CONNECTION TO NEIGHBOURING  
PEDESTRIAN MOVEMENT INFRASTRUCTURE
-  INDICATIVE CONTOUR LEVELS (TBC WITH  
TOPOGRAPHICAL REPORT)



## 06

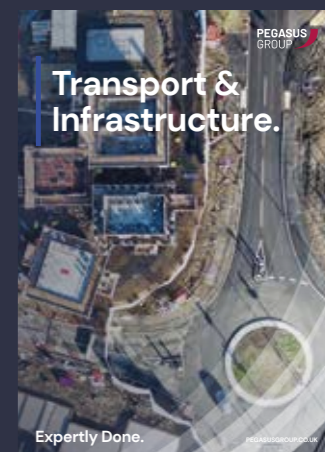
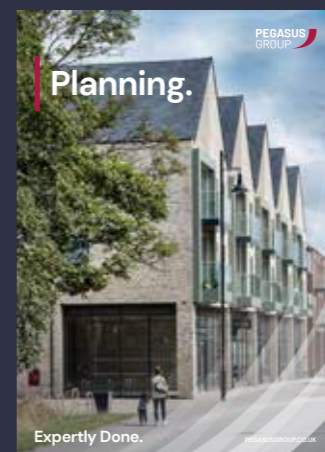
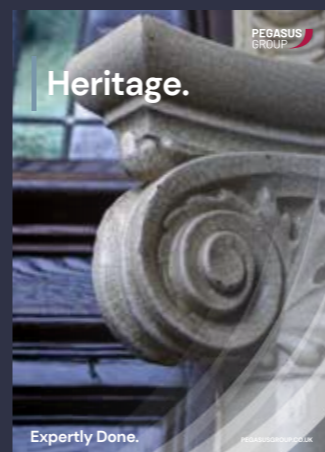
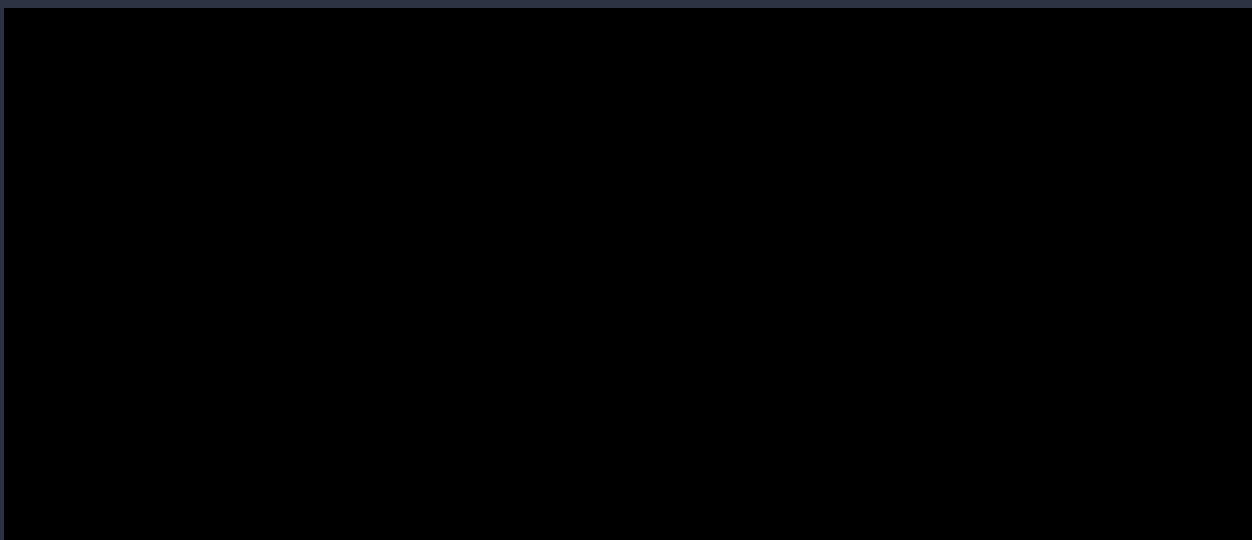
## CONCLUSIONS

## SUMMARY

- 6.1 The Council has commenced work on a review of the Local Plan. This document is intended to a comprehensively review the vision, strategic objectives, development requirements, spatial development strategy and policies for shaping detailed development proposals.
- 6.2 Stone is the second largest settlement within Stafford Borough and recognised as a sustainable location for growth. There are a good range of services and facilities available within the town and further investment in these services and associated infrastructure is planned and could be further supported by planned growth.
- 6.3 Bloor Homes' emerging proposals for land at Eccleshall Road would be capable of contributing positively to meeting the housing needs of the Borough to 2040 within the sustainable settlement of Stone.
- 6.4 Land at Eccleshall Road would deliver up to approximately 600 dwellings with access achievable from Eccleshall Road. There would be the opportunity to provide for a range of dwelling types and sizes at a density that would respect the adjacent pattern of development on the modern developments currently under construction to the east and the south of the site. Land at Eccleshall Road represents the logical location for meeting the development needs within Stone to 2040.
- 6.5 The initial assessments on matters such as heritage, landscape, drainage, flooding and transport contained within this Promotional Document indicate that there are no overriding constraints which would restrict development in this location.
- 6.6 Bloor Homes is continuing to commission further surveys and other related work to refine the proposals for land at Eccleshall Road. As part of this refinement process it is Bloor Homes' intention to engage with the Council and other stakeholders to discuss the range of issues associated with a housing proposal of this type.

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# Meecebrook

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## Review of new passenger station proposals

5<sup>th</sup> December 2022

## Document history

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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.<sup>1</sup> 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.<sup>2</sup>
- 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).

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<sup>1</sup> Meecebrook Garden Community Leaflet, page 2

<sup>2</sup> <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.<sup>3</sup>

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;**

<sup>3</sup> 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.<sup>4</sup>

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.<sup>5</sup>

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

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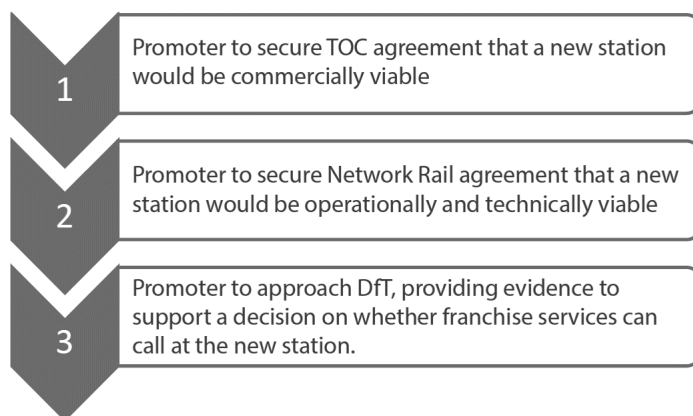
<sup>4</sup> Pages 3-4

<sup>5</sup> 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.<sup>6</sup>

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.<sup>7</sup>

**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.<sup>8</sup>

<sup>6</sup> Page 6

<sup>7</sup> Page 7

<sup>8</sup> 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.<sup>9</sup>

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.<sup>10</sup>

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.<sup>11</sup>

- 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) <sup>12</sup>	2010	2017	3.5	2030
Magor and Undy (South Wales) <sup>13</sup>	2013	2018	1.7	None at present
Worcestershire Parkway <sup>14</sup>	2006	2014	3.3 – 3.6	2020
Cambridge South <sup>15</sup>	2017	2021	1.9	2025
Darlaston and Willenhall stations (West Midlands) <sup>16</sup>	2017	2021	4.7 – 6.5	2023

<sup>9</sup> Page 17

<sup>10</sup> Page 20

<sup>11</sup> 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](https://www.whatdotheyknow.com/request/599394/response/1427134/attach/3/FINAL%20Old%20Oak%20Overground%20Stations%20Consolidated%20SOBC%202017%20Full%20Document.pdf?cookie_passthrough=1)

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

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

<sup>15</sup> <https://sacuksprodnrdrigital0001.blob.core.windows.net/twao-cambridge-south-infrastructure-enhancements/Cambridge%20South%20station%20OBC/Cambridge%20South%20Outline%20Business%20Case.pdf>

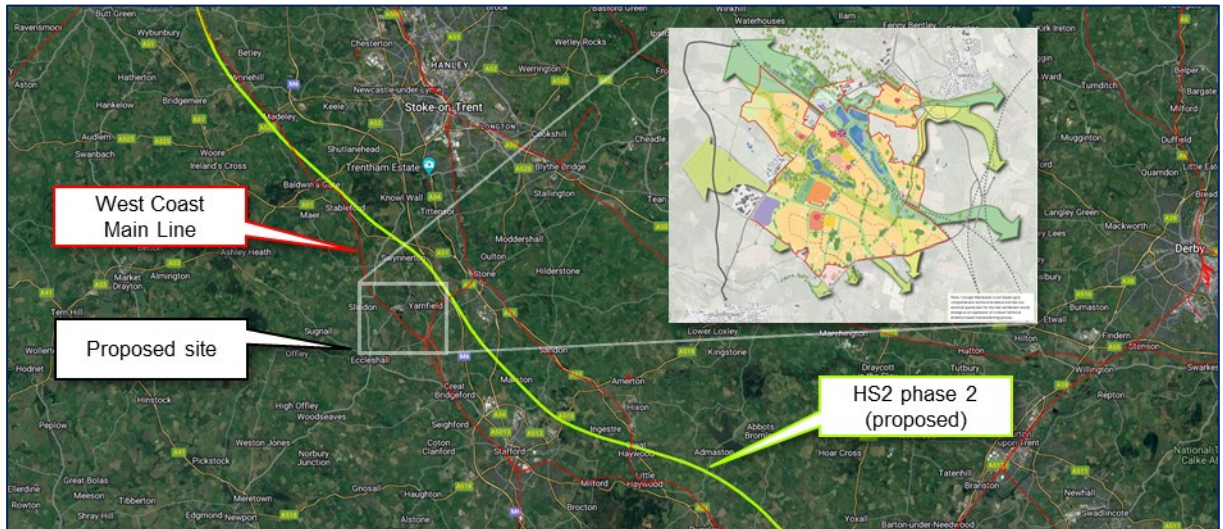
<sup>16</sup> <https://governance.wmca.org.uk/documents/s5126/Report.pdf>

### 3 The proposed site

#### 3.1 Location

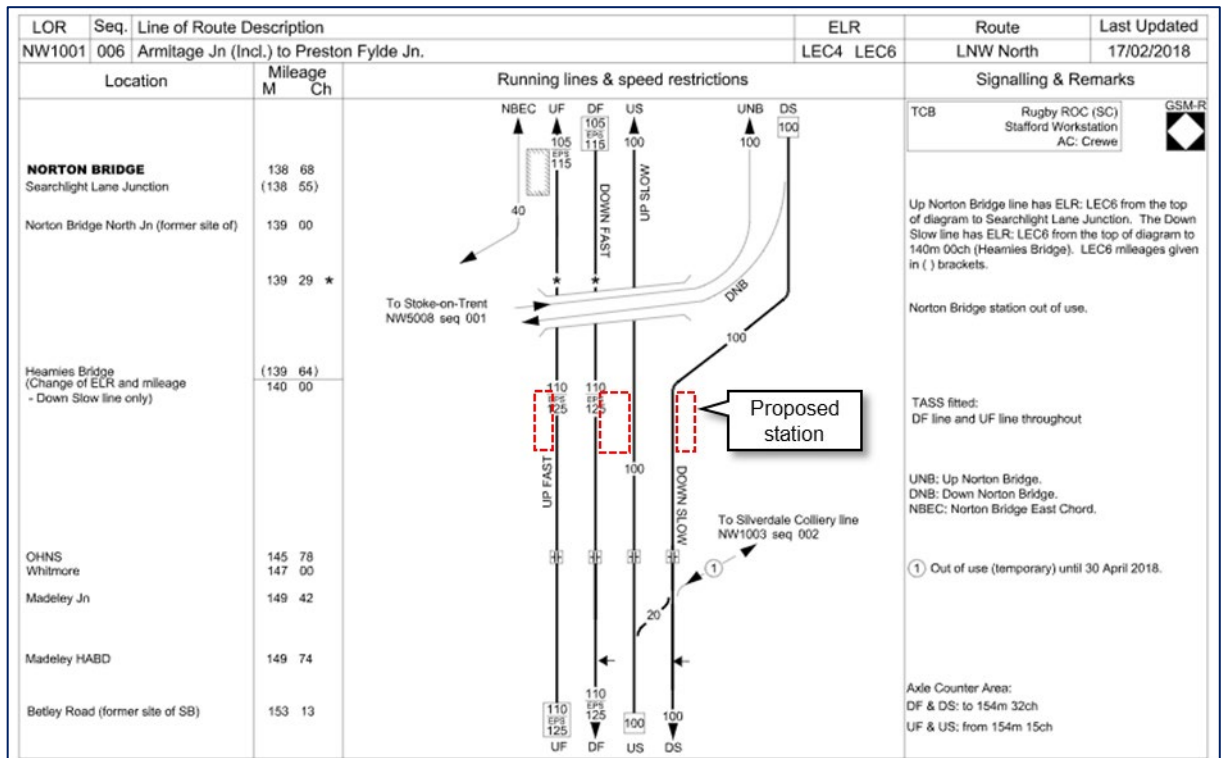
3.1.1 The location of the site relative to the West Coast Main Line (WCML) is shown in the Figure below:

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.<sup>17</sup>

- 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.<sup>18</sup>

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

<sup>18</sup> <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.<sup>19</sup> 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.<sup>20</sup>

### 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.<sup>21</sup> 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.<sup>22</sup>

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<sup>19</sup> Source Network Rail (realtimetrains.co.uk website)

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

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

<sup>22</sup> <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 homes<sup>23</sup>) 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;<sup>24</sup>
- 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;<sup>25</sup>
- 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.<sup>26</sup>

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<sup>23</sup> Page 4 section 1.1

<sup>24</sup> Page 7, 24

<sup>25</sup> Page 8

<sup>26</sup> 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.**<sup>27</sup>

- 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).<sup>28</sup> 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.<sup>29</sup>

- 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.<sup>30</sup>

- 4.3.7 SYSTRA then reiterate later in the document that:

<sup>27</sup> Sharnbrook Railway Station Initial Transport Feasibility, SYSTRA for Bedford Council

<sup>28</sup> Page 13 of SYSTRA report

<sup>29</sup> Page 14 of SYSTRA report

<sup>30</sup> 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.<sup>31</sup>

### **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.<sup>32</sup>

- 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.<sup>33</sup>

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

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<sup>31</sup> Page 19 of SYSTRA report

<sup>32</sup> Page 6 of Rail Aspect Report

<sup>33</sup> 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.<sup>34</sup>

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.<sup>35</sup>

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.

<sup>34</sup> Page 2 of Rail Aspect Report

<sup>35</sup> 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.<sup>36</sup>

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.<sup>37</sup>

#### 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:

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<sup>36</sup> Page 12 of Rail Aspect Report

<sup>37</sup> 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.<sup>38</sup>

- 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.<sup>39</sup> 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.<sup>40</sup>
- 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%<sup>41</sup>) 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.<sup>42</sup> 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.**

<sup>38</sup> Page 31 of the Feasibility Report

<sup>39</sup> Page 18 of Feasibility report

<sup>40</sup> Page 16 of SYSTRA report

<sup>41</sup> Page 17 of SYSTRA report

<sup>42</sup> [https://www.whatdotheyknow.com/request/meecebrook\\_claims\\_regarding\\_new](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 23<sup>rd</sup> 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.<sup>43</sup>

- 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;<sup>44</sup>
- 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.

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

<sup>44</sup> 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](https://www.whatdotheyknow.com/request/meecebrook_claims_regarding_new)



[REDACTED]

By email: [request-906118-c2ae0023@whatdotheyknow.com](mailto:request-906118-c2ae0023@whatdotheyknow.com)

Network Rail  
Freedom of Information

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

31 October 2022

Dear [REDACTED]

**Information request**

**Reference number: FOI2022/01225**

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

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

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

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

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

---

<sup>1</sup> 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, The Quadrant, [REDACTED] or by email at [REDACTED]. Your request must be submitted within 40 working days of receipt of this letter.

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

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

**Intermodality**

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# Education Impact & Mitigation Assessment<sup>®</sup>

## Land off Eccleshall Road, Stone

Client: Bloor Homes Limited

Report By: [REDACTED]

Document Date: 11<sup>th</sup> December 2022

Document Version: 1-0

**EHP Consultants**

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## 1. Introduction

### 1.1. Report Purpose & Scope

1.1.1. EHP Consultants has been asked to consider the proposed client development and other relevant developments for their likely impact on education places in the local area.

1.1.2. The purpose of this Assessment is to act as an initial point of reference following the recent Potential Sites Consultation regarding the Stafford Borough Council Local Plan 2020-2040 and to assist in the negotiation of education-specific mitigation pertaining to the proposed development.

### 1.2. Intended Audience

1.2.1. This Education Impact & Mitigation Assessment is intended for the client team and may be shared with other parties.

### 1.3. Research Sources

1.3.1. The contents of this Education Impact & Mitigation Assessment are based on publicly available information, including data from central government and any relevant local planning authorities and any relevant local education authorities.

### 1.4. Research & Analysis

1.4.1. Research for this Education Impact & Mitigation Assessment was carried out in November and December 2022.

1.4.2. Research has been conducted regarding the current position within local schools, current local policy on developer contributions and an analysis of the most up to date forecasts regarding local education provision in the public domain.

1.4.3. Staffordshire County Council ('SCC') produces school forecasts when assessing the impacts of residential development on school places.

1.4.4. Other related information for use within this Education Impact & Mitigation Assessment was requested via the submission of Freedom of Information ('FOI') requests to SCC.

1.4.5. Our commentary regarding the relevance of this data and related information is also set out within this Education Impact & Mitigation Assessment.



## 1.5. Community Infrastructure Levy Regulations

1.5.1. The Community Infrastructure Levy ('the levy') Regulations came into force in April 2010. The levy is intended to provide infrastructure to support the development of an area rather than to make individual planning applications acceptable in planning terms. As a result, there may still be some site specific impact mitigation requirements without which a development should not be granted planning permission.

1.5.2. However, in order to ensure that planning obligations and the levy can operate in a complementary way and the purposes of the two regimes are clarified, the regulations scale back the way planning obligations operate. Limitations are placed on the use of planning obligations in three respects.

1.5.3. The first of these, which is the relevant consideration in this matter, is putting the Government's policy tests on the use of planning obligations set out in Circular 5/05 Planning Obligations on a statutory basis for developments that are capable of being charged the levy.

1.5.4. The regulations place into law for the first time the Government's policy tests on the use of planning obligations. The statutory tests are intended to clarify the purpose of planning obligations in light of the levy and provide a stronger basis to dispute planning obligations policies, or practice, that breach these criteria. This seeks to reinforce the purpose of planning obligations in seeking only essential contributions to allow the granting of planning permission, rather than more general contributions that are better suited to use of the levy.

1.5.5. Planning obligations assist in mitigating the impact of unacceptable development to make it acceptable in planning terms. Planning obligations may only constitute a reason for granting planning permission if they meet the tests that they are necessary to make the development acceptable in planning terms. They must be:

- a) necessary to make the development acceptable in planning terms; and
- b) directly related to the development; and
- c) fairly and reasonably related in scale and kind to the development.

1.5.6. The above tests are set out as statutory tests in [regulation 122](#) (as amended by the 2011 and 2019 Regulations) and as policy tests in the National Planning Policy Framework at [paragraph 56](#). These tests apply whether or not there is a levy charging schedule for the area.

1.5.7. From 1<sup>st</sup> September 2019 revised regulations came into force and these, amongst other things, introduced a requirement on CIL charging authorities to produce an annual statement regarding sums received both through CIL and planning obligations.

1.5.8. These regulations also removed the limit of pooling no more than 5 planning obligations towards one item of infrastructure, which had been a particular issue with regards to the provision of education infrastructure.



## 1.6. Department for Education Guidance on Planning Obligations

1.6.1. In April 2019 the Department for Education ('DfE') published a non-statutory guidance document titled "Securing Developer Contributions for Education". This guidance was updated by the DfE in November 2019.

1.6.2. This DfE document is non-statutory guidance for local authorities regarding seeking planning obligations towards education provision from residential development.

1.6.3. Whilst this DfE document is non-statutory, it is important to consider elements of this guidance as they would carry some weight in a planning context.

1.6.4. The purpose of the DfE guidance is underpinned by four principles, as set out below:

- Housing development should mitigate its impact on community infrastructure, including schools;
- Pupil yield factors should be based on up-to-date evidence from recent housing developments;
- Developer contributions towards new school places should provide both funding for construction and land where applicable, subject to viability assessment when strategic plans are prepared and using up-to-date cost information;
- The early delivery of new schools within strategic developments should be supported where it would not undermine the viability of the school, or of existing schools in the area.

[Source: DfE Securing Developer Contributions for Education (November 2019), at Appendix EHP01].

1.6.5. However, it should be noted that nothing within this non-statutory guidance supersedes the tests set out in section 1.5 above.



## 2. Setting the Context for Local School Place Planning

### 2.1. Staffordshire County Council's Duty to Secure Sufficient School Places

2.1.1. The site lies within the primary and secondary designated catchment areas for schools for which the local education authority is Staffordshire County Council ('SCC').

2.1.2. The Education Act 1996 (as amended) provides in section 14(1):

*"A local education authority shall secure that sufficient schools for providing – (a) primary education and (b) secondary education ... are available for their area".*

2.1.3. The Education Act does not state it is the duty of a local education authority to ensure that there are sufficient school places at the catchment area school for all children residing within that particular school's catchment area.

2.1.4. The Education Act simply states that the education authority must provide school education appropriate to the requirements of pupils for its area. In the case of SCC that is the area defined as the county of Staffordshire.

2.1.5. This duty applies in relation to all the children in the local education authority area, whether they have lived there all their lives or have just moved into a new development.

2.1.6. The residential component of the proposed development will include family housing. Family housing often includes school age children who will seek to enrol in local schools. Those schools may or may not be sufficient to accommodate these children without the need for additional capacity to be provided.

### 2.2. School Organisation

2.2.1. The year of entry into primary schools is known as Year R, when children are typically 5 years of age. The year of entry into secondary schools is known as Year 7, when children are typically 11 years of age, with the exception of studio colleges or university technical colleges whose year of entry is Year 10 when children will be 14 years old.

2.2.2. Education is compulsory for children up until the age of 16, equivalent to Year 11; hence there are 5 year groups at secondary school. The sixth form year groups are known as Years 12 and 13 respectively. Not all secondary schools offer sixth form education.

2.2.3. All schools have a Published Admissions Number ('PAN') which indicates the number of pupils the school can take in each year group. If this number is then multiplied by the number of year groups at the school, this gives an indicative capacity of the numbers that the school can theoretically accept.

2.2.4. School capacity is often measured in terms of forms of entry ('FE'). A single class can typically accommodate up to 30 children. The Number on Roll ('NOR') is the number of children at a school.

2.2.5. Reception is the year of entry to primary school and is often referred to as "Year R". The subsequent year groups are often referred to as "Year 1" to "Year 6" respectively.



- 2.2.6. As primary schools have 7 year groups, a 2FE primary school would have capacity for 420 children [*calculation: 30 x 7 x 2 = 420*]; with 1FE of primary education provision equating to 210 primary school places.
- 2.2.7. Similarly, as secondary schools have 5 year groups, a 6FE secondary school would have capacity for 900 pupils aged 11-16 [*calculation: 30 x 5 x 6 = 900*]; with 1FE of secondary education provision equating to 150 secondary school places.
- 2.2.8. SCC currently operates a 2-tier education system (primary and secondary schools) in some areas and a 3-tier education system (first schools, middle schools and upper schools) in other areas.

### 2.3. Walking Distance to School

- 2.3.1. Two miles is considered the maximum reasonable statutory walking distance to school for children aged 8 and under, and three miles for those over 8 years of age, as indicated by the Department for Education in its document “Home to school travel and transport guidance” [Appendix EHP02].
- 2.3.2. Our analyses include an assessment of the position at the schools within a reasonable walking distance of the proposed development.

### 2.4. Patterns of Pupil Migration

- 2.4.1. There is likely to be movement of children between respective schools’ catchment areas, pseudo-catchment areas (based on furthest distances of places offered), designated areas, or priority areas. This movement of children due to parental preference and other factors is often referred to as “inflow” and “outflow”.

### 2.5. The Role of School Forecasts in School Place Planning

- 2.5.1. Each Local Education Authority (‘LEA’) is obliged to provide annual school forecasts to the DfE.
- 2.5.2. The DfE provides detailed guidance to LEAs to help ensure that school forecasts are as accurate as possible.
- 2.5.3. The DfE makes the following request with regards to how LEAs treat housing developments within their forecasts:

*“Housing developments can have a big impact on the demand for places in individual planning areas, or across entire local authorities.*

*The pupil forecasts you submit in SCAP should only include expected pupil yields from housing developments that have a high probability of being delivered within the timeframe of the forecasts. In most cases such developments will have full planning permission. If you believe a development that does not have full planning permission will proceed and will yield pupils within the forecast’s timeframe, we expect that development to be present in the relevant planning authority’s latest 5-year land supply. Wherever this is the case we may test the suitability of inclusion of such housing developments in SCAP forecasts by reviewing evidence on the site’s deliverability and assessing delivery against previous 5-year land supply plans in the relevant planning authority.”*

[Source: DfE - School Capacity (SCAP) Survey 2022 - Guide for local authorities (May 2022) at Appendix EHP03]



### 3. The Proposed Development Site

#### 3.1. Proposed Development Location

3.1.1. The proposed development site ('the Site') in Stone lies within the planning remit of Stafford Borough Council ('SBC').

3.1.2. Sites were submitted through the 'Call for Sites' process to be included in the SBC Strategic Housing and Employment Land Availability Assessment (SHELAA). The Site is referred to as site 'STO14' within the SBC Site Assessment Profiles document [source: Stafford Borough Local Plan 2020-2040 [website](#)].

3.1.3. The Site location is off Eccleshall Road in Stone as shown in the Promotional Document extract below:



[Source: Site location extract, at Appendix EHP04]



### 3.2. Dwelling Mix

3.2.1. The client's Development Framework Plan for site STO14 included up to 478 dwellings of which 40% includes affordable provision (comprising 65% social rented, 25% First Homes and 10% shared ownership dwellings).

3.2.2. The Open Market Mix currently includes 15% 1 bed, 35% 2 bed, 40% 3 bed and 10% 4+ bed dwellings.

3.2.3. If a different dwelling number and mix is specified at a later date then we will be able to adjust our analysis and conclusions accordingly.

### 3.3. Estimated Build Programme

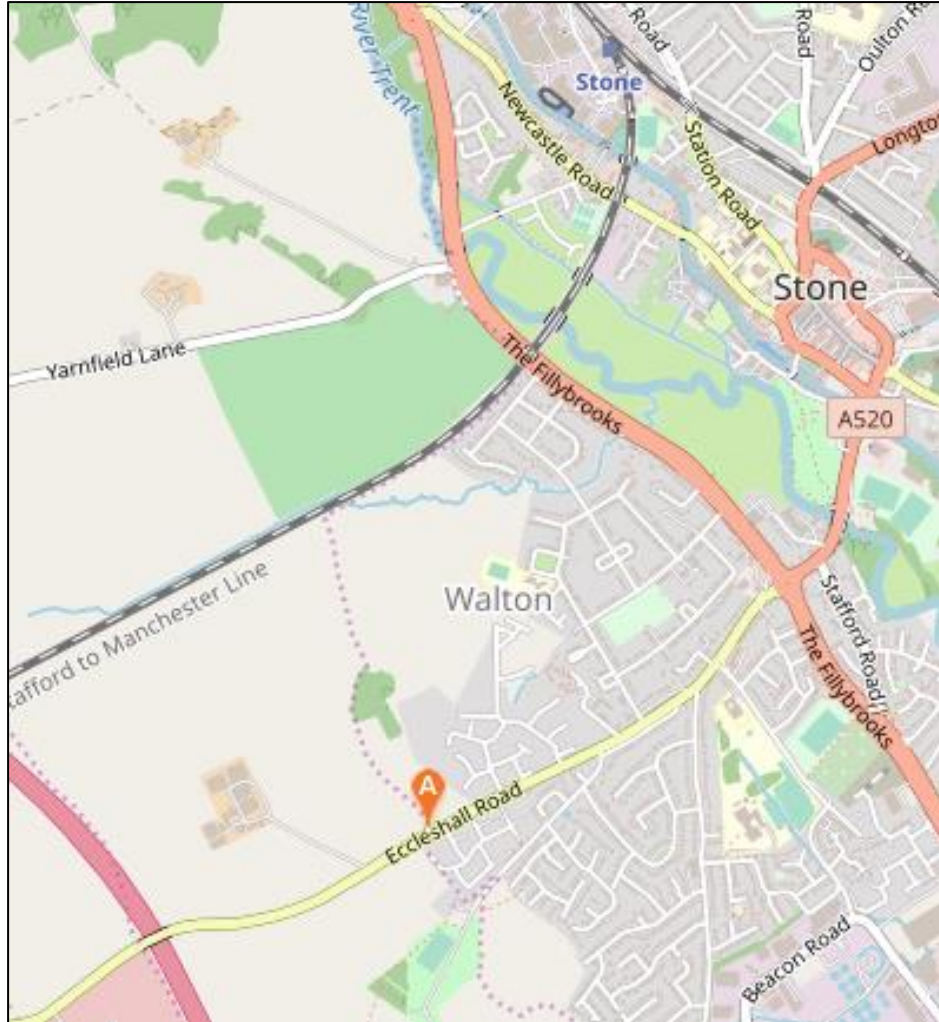
3.3.1. We set out the following scenario below using a build-rate of 50 dwellings per annum and the client's estimated start date of 2025/26:

Year >	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35
<b>The Site</b>		50	50	50	50	50	50	50	50	50	28
<b>Cumulative Total</b>		<b>50</b>	<b>100</b>	<b>150</b>	<b>200</b>	<b>250</b>	<b>300</b>	<b>350</b>	<b>400</b>	<b>450</b>	<b>478</b>

[Source: Estimated build programme for the Site based on current client estimates]

3.4. Walking Routes from the Site Location

3.4.1. For the purposes of this Assessment all walking distances have been measured from Eccleshall Road adjacent to the vehicular entrance to the Site, as shown by the orange 'A' icon on the map extract below:



## 4. The Position at Local Schools

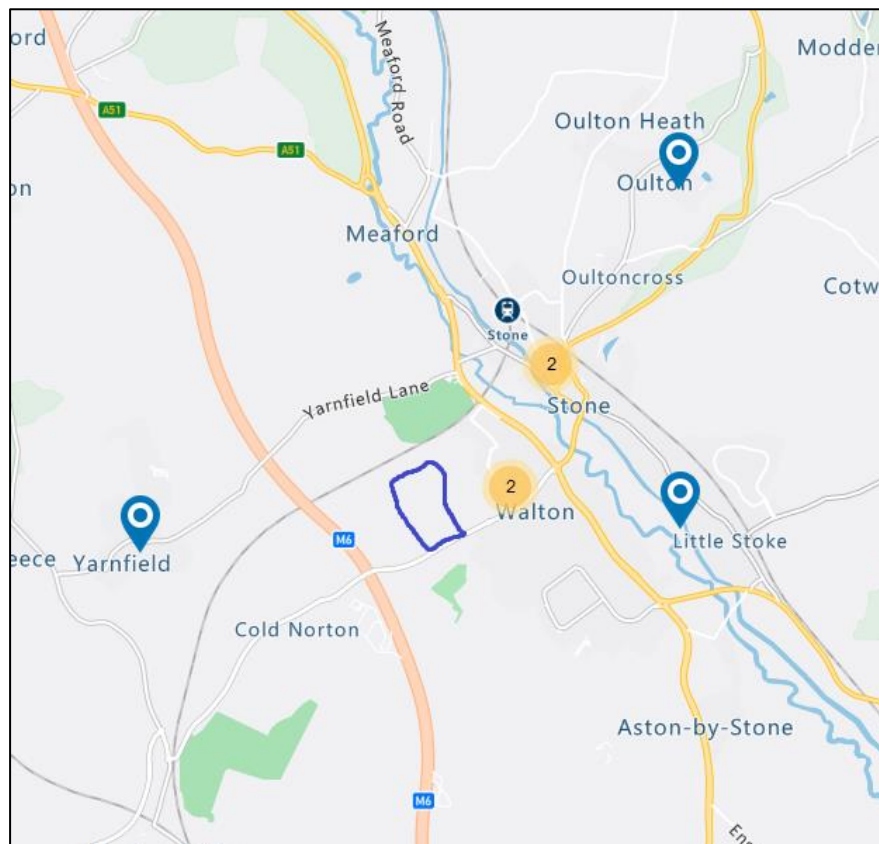
### 4.1. Local First School Locations

4.1.1. SCC defines 'Stone Town Primary' as the relevant local first school planning area for the Site based on the location of the Site.

4.1.2. Stone Town Primary planning area contains the following 7 first schools in alphabetical order:

- Christ Church CofE First School
- Manor Hill First School
- Oulton CofE First School
- Pirehill First School
- Springfields First School
- St Dominic's Catholic Primary School
- St Michael's CofE (C) First School

4.1.3. The broad locations of the closest local first schools are indicated below (any blue icons indicate single school locations, any numbered icons indicate multiple schools near the same location and the blue-lined area is an indication of the approximate location of the Site):



**Graphic:** First school locations relative to the Site.

[Source: DfE website]



4.1.4. The first schools within the Stone Town Primary planning area are the following travel distances from the Site:

First School	Travel Distance from the Site (miles)
Pirehill First School	0.6
Manor Hill First School	0.7
St Dominic's Catholic Primary School	1.3
Christ Church CofE First School	1.4
St Michael's CofE (C) First School	2.3
Oulton CofE First School	2.8
Springfields First School	3.5

**Table:** Travel distances from the Site to first schools within the Stone Town Primary planning area, in order of increasing distance.

4.1.5. It is evident that of the 7 first schools in the Stone Town Primary planning area 4 of these schools are within 2 miles' travel distance of the Site.

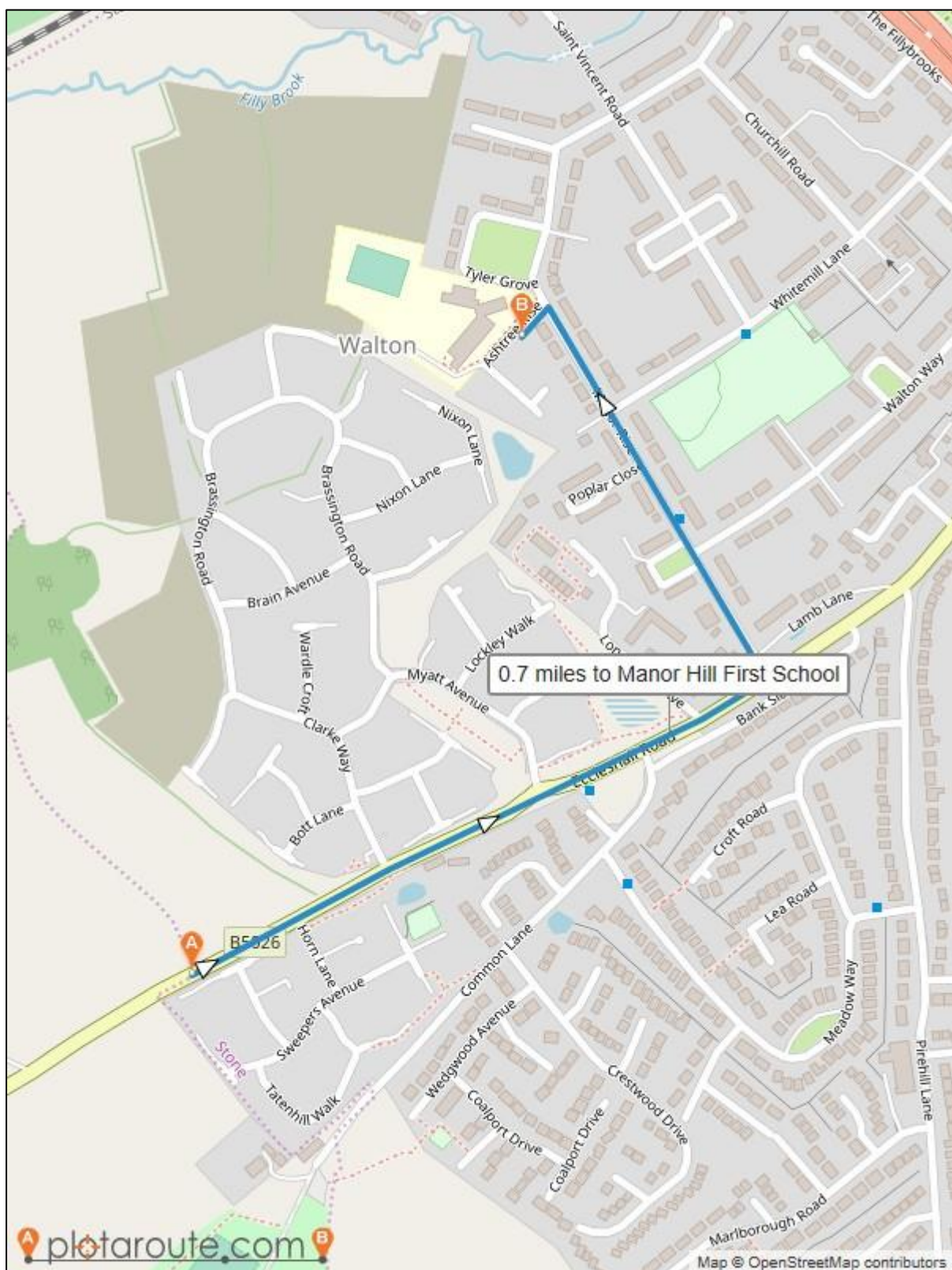


4.1.6. The following map shows a 0.6-mile travel route from the Site to Pirehill First School:





4.1.7. The following map shows a 0.7-mile travel route from the Site to the location of Manor Hill First School:





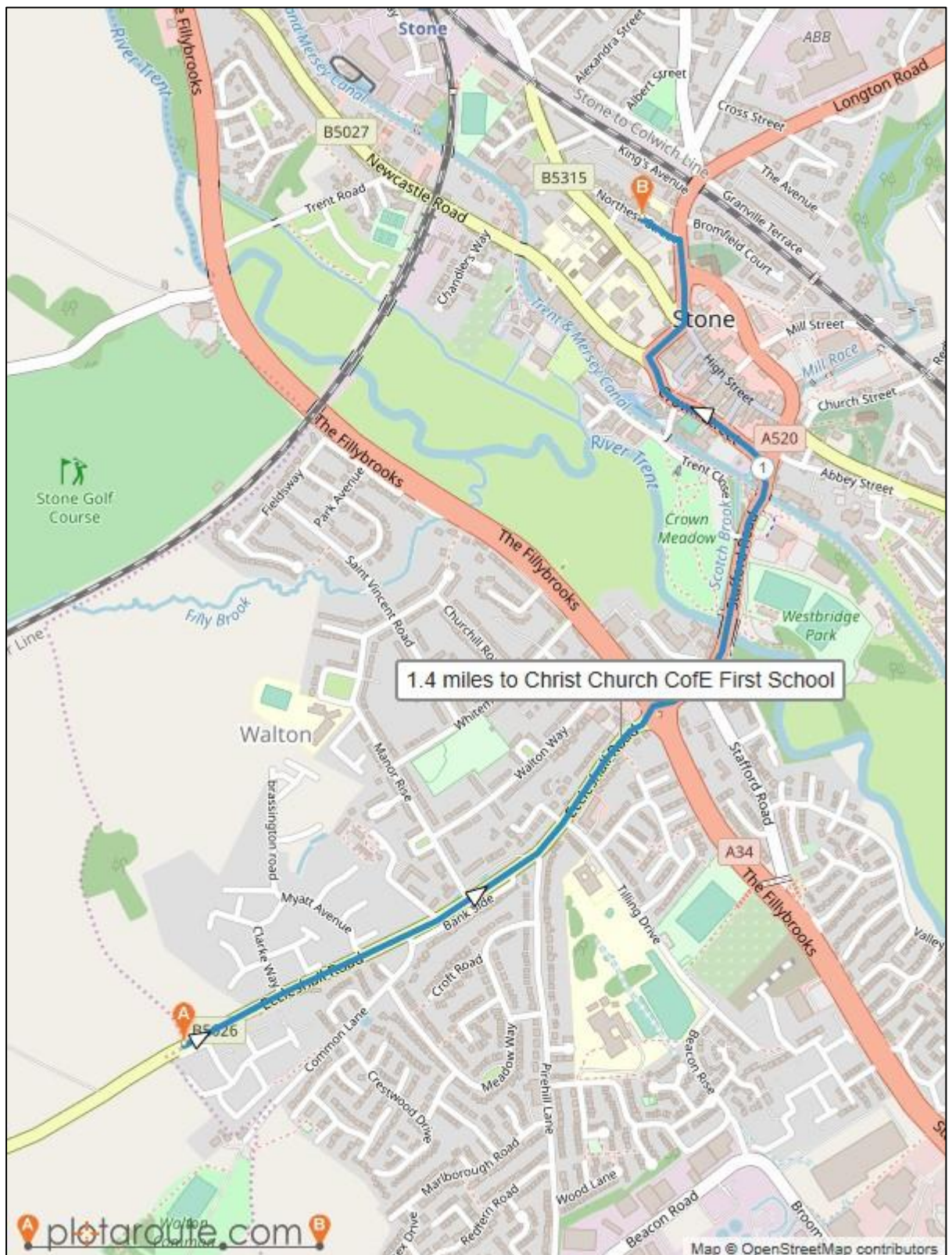
4.1.8. The following map shows a 1.3-mile travel route from the Site to the location of St Dominic's Catholic Primary School:







4.1.9. The following map shows a 1.4-mile travel route from the Site to the location of Gnosall Christ Church CofE First School:



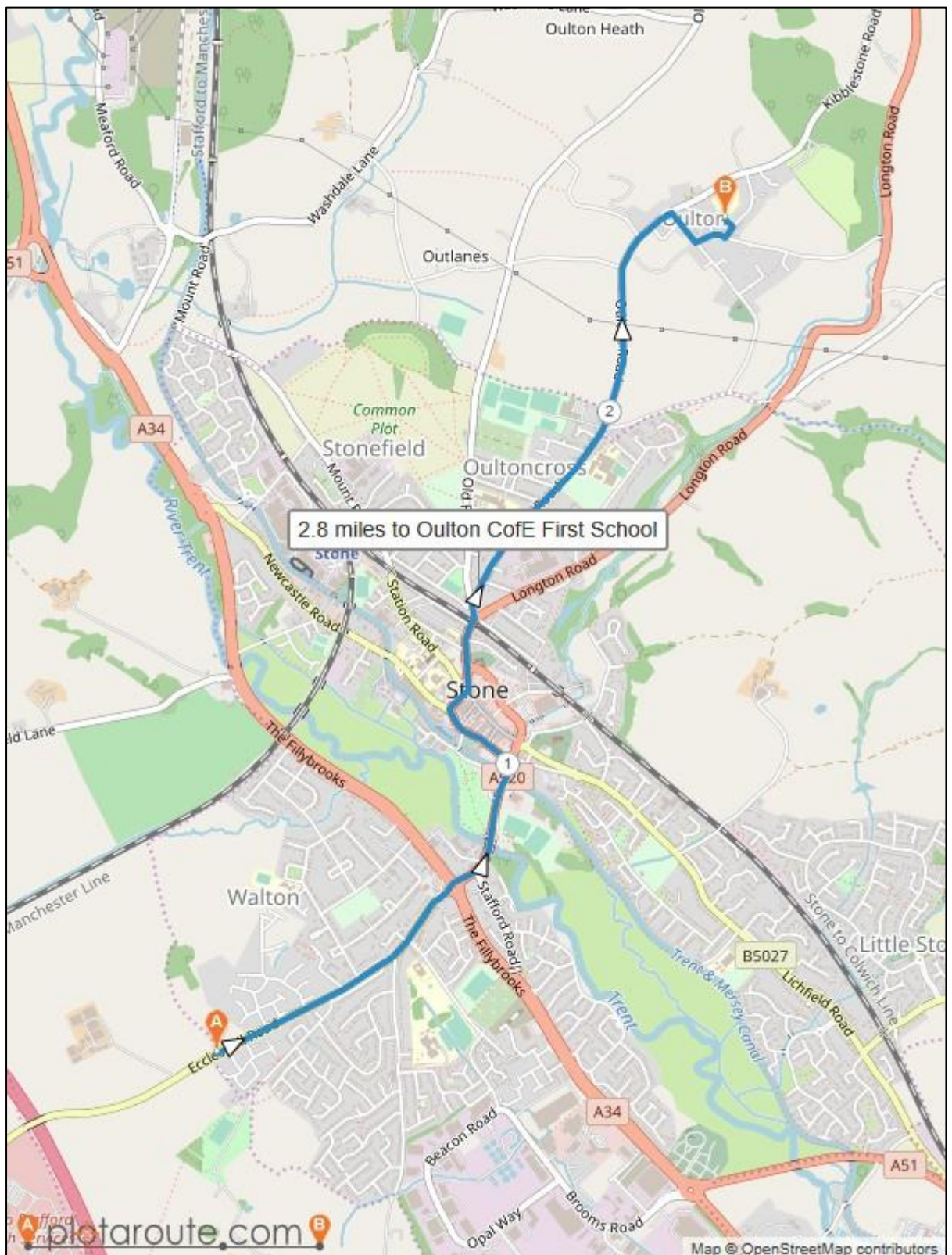


4.1.10. The following map shows a 2.3-mile travel route from the Site to the location of St Michael's CofE (C) First School:



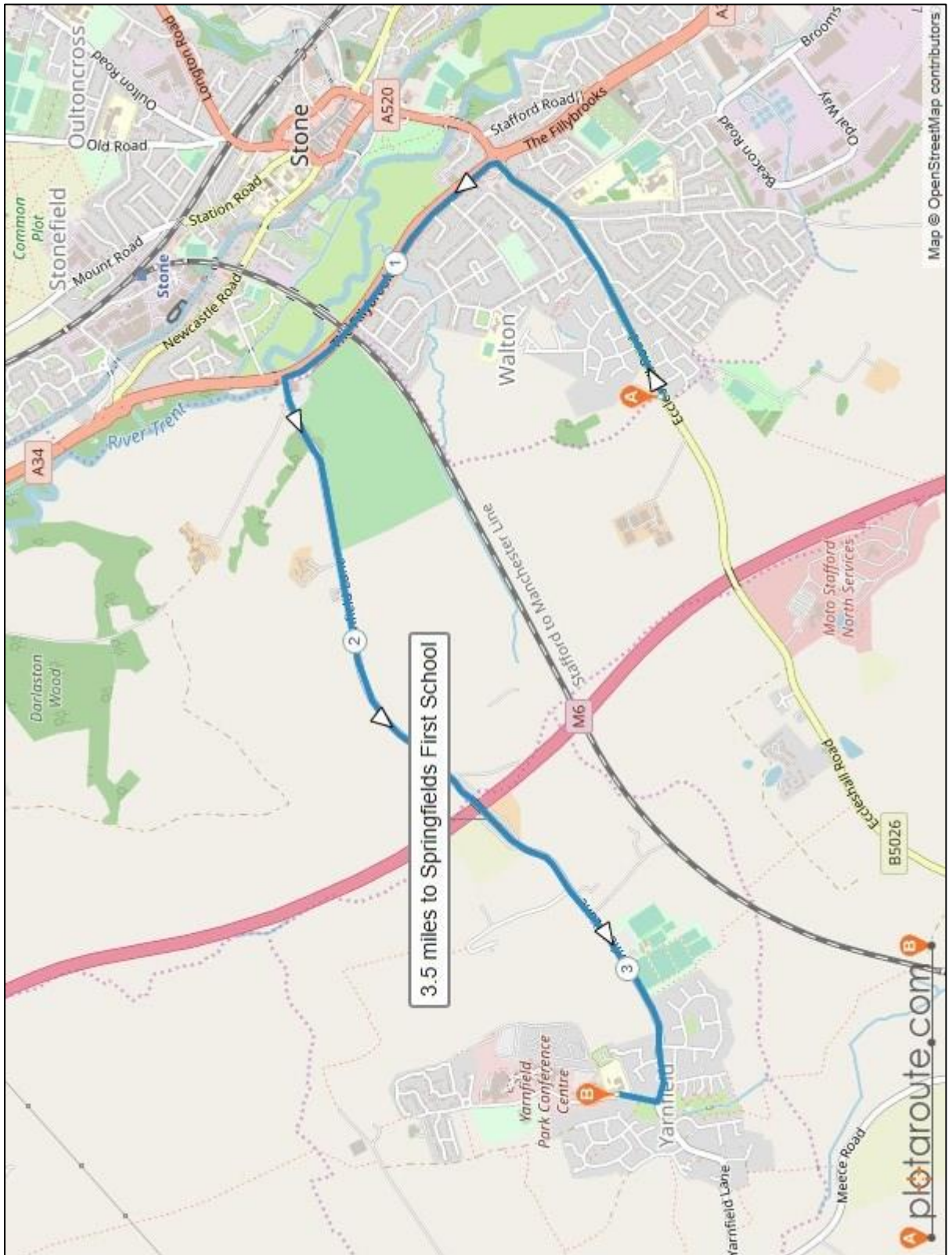


4.1.11. The following map shows a 2.8-mile travel route from the Site to the location of Oulton CofE First School:





4.1.12. The following map shows a 3.5-mile travel route from the Site to the location of Springfields First School:





#### 4.2. Local First Schools – Forecast Status of Pupil Places

4.2.1. The latest available first school forecasts were those submitted to the DfE as part of the annual school data submission in mid-2022, contained within what is known as the annual “SCAP”.

4.2.2. It is important to note that in mid-2019 BBC did not produce first school forecasts beyond the academic year 2025/26, as at that time forecasts beyond 2025/26 would have needed to rely on a degree of assumed birth rates, rather than known, actual birth rates.

4.2.3. The forecast horizon until 2025/26 was that which was expected by the DfE when local education authorities submitted their first school forecast data in mid-2022.

4.2.4. It would have been possible for LEAs to produce forecasts beyond 2025/26, however these would have needed to rely on a degree of assumed, rather than known actual, birth rates.

4.2.5. The latest available SCC school data showing the forecast position of pupil places for the 7 first schools in the Stone Town Primary planning area was due to be as shown in the Table below:

School Planning Area	Total Net Capacity	SCC Forecast Children on Roll			SCC Forecast Surplus / Deficit Places		
		23/24	24/25	25/26	23/24	24/25	25/26
Stone Town Primary	2,046	1,793	1,794	1,805	253	252	241

**Table:** Forecast position of pupil places for the 7 first schools in the Stone Town Primary planning area for the academic years from 2023/24 to 2025/26, as provided by SCC.

[Source: School forecast data and capacity data at Appendices EHP05 and EHP06]

4.2.6. The above net capacity figure does not include any potential school expansions in the relevant Stone Town Primary planning area.

4.2.7. On the basis of these SCC forecasts for these 7 first schools it is evident that there were a number of local first school places forecast to be available in the near future.

4.2.8. On the basis of these SCC forecasts it is evident that the percentage of surplus places was due to decrease slightly from **12.4%** in 2023/24 [*calculation: 253 / 2,046 = 12.4%*] to **11.8%** in 2025/26 [*calculation: 241 / 2,046 = 11.8%*].

4.2.9. It is also very important to emphasise that the SCC first school forecast data includes the impact of any residential sites which were consented as planning applications.



4.2.10. Further commentary regarding the demand for local first school places and the wider implications for first school place planning in the area is also set out later in this Assessment.

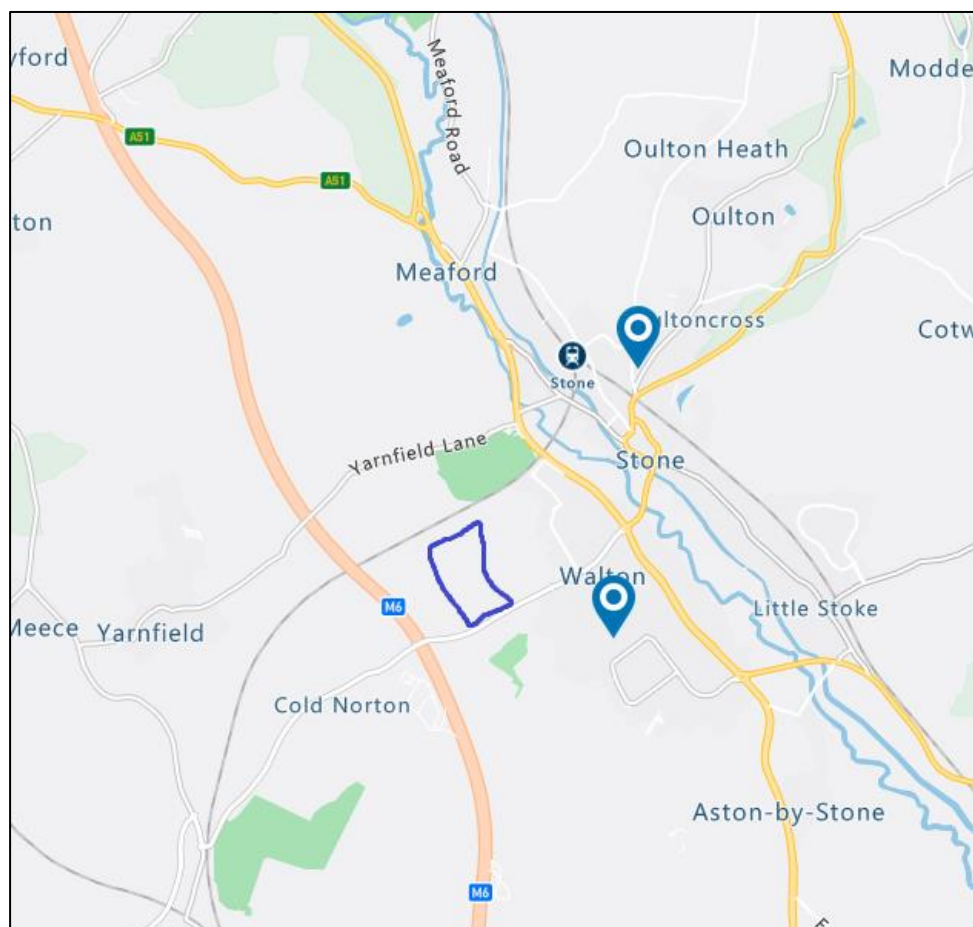
#### 4.3. Local Middle School Locations

4.3.1. SCC defines 'Stone M Secondary' as the relevant local middle school planning area for the Site based on the location of the Site.

4.3.2. Stone M Secondary planning area contains the following 2 middle schools in alphabetical order:

- Christ Church Academy
- Walton Priory Middle School

4.3.3. The broad locations of the closest local middle schools are indicated below (any blue icons indicate single school locations and the blue-lined area is an indication of the approximate location of the Site):



**Graphic:** Middle school locations relative to the Site.

[Source: DfE website]



4.3.4. The middle schools within the Stone M Secondary planning area are the following travel distances from the Site:

Middle School	Travel Distance from the Site (miles)
Walton Priory Middle School	0.8
Christ Church Academy	1.7

**Table:** Travel distances from the Site to middle schools within the Stone M Secondary planning area, in order of increasing distance.

4.3.5. It is evident that of the 2 middle schools in the Stone M Secondary planning area both of these schools are within 3 miles' travel distance of the Site.





4.3.6. The following map shows a 0.8-mile travel route from the Site to Walton Priory Middle School:





4.3.7. The following map shows a 1.7-mile travel route from the Site to the location of Christ Church Academy:





#### 4.4. Local Middle Schools – Forecast Status of Pupil Places

4.4.1. The latest available middle school forecasts were those submitted to the DfE as part of the annual school data submission in mid-2022, contained within what is known as the annual “SCAP”.

4.4.2. The forecast horizon until 2027/28 was that which was expected by the DfE when local education authorities submitted their secondary school forecast data in mid-2022.

4.4.3. The latest available SCC school data showing the forecast position of pupil places for the 2 middle schools in the Stone M Secondary planning area was due to be as shown in the Table below:

School Planning Area	Total Net Capacity	SCC Forecast Children on Roll			SCC Forecast Surplus / Deficit Places		
		23/24	25/26	27/28	23/24	25/26	27/28
Stone M Secondary	575	554	556	565	21	19	10

**Table:** Forecast position of pupil places for the 2 middle schools in the Stone M Secondary planning area for the academic years from 2023/24 to 2027/28, as provided by SCC.

[Source: School forecast data and capacity data at Appendices EHP05 and EHP06]

4.4.4. The above net capacity figure does not include any potential school expansions in the relevant Stone M Secondary planning area.

4.4.5. On the basis of these SCC forecasts for these 2 middle schools it is evident that there were very few local middle school places forecast to be available in the near future.

4.4.6. On the basis of these SCC forecasts it is evident that the percentage of surplus places was due to decrease slightly from **3.7%** in 2023/24 [*calculation: 21 / 575 = 3.7%*] to **1.7%** in 2027/28 [*calculation: 10 / 575 = 1.7%*].

4.4.7. It is also very important to emphasise that the SCC middle school forecast data includes the impact of any residential sites which were consented as planning applications.

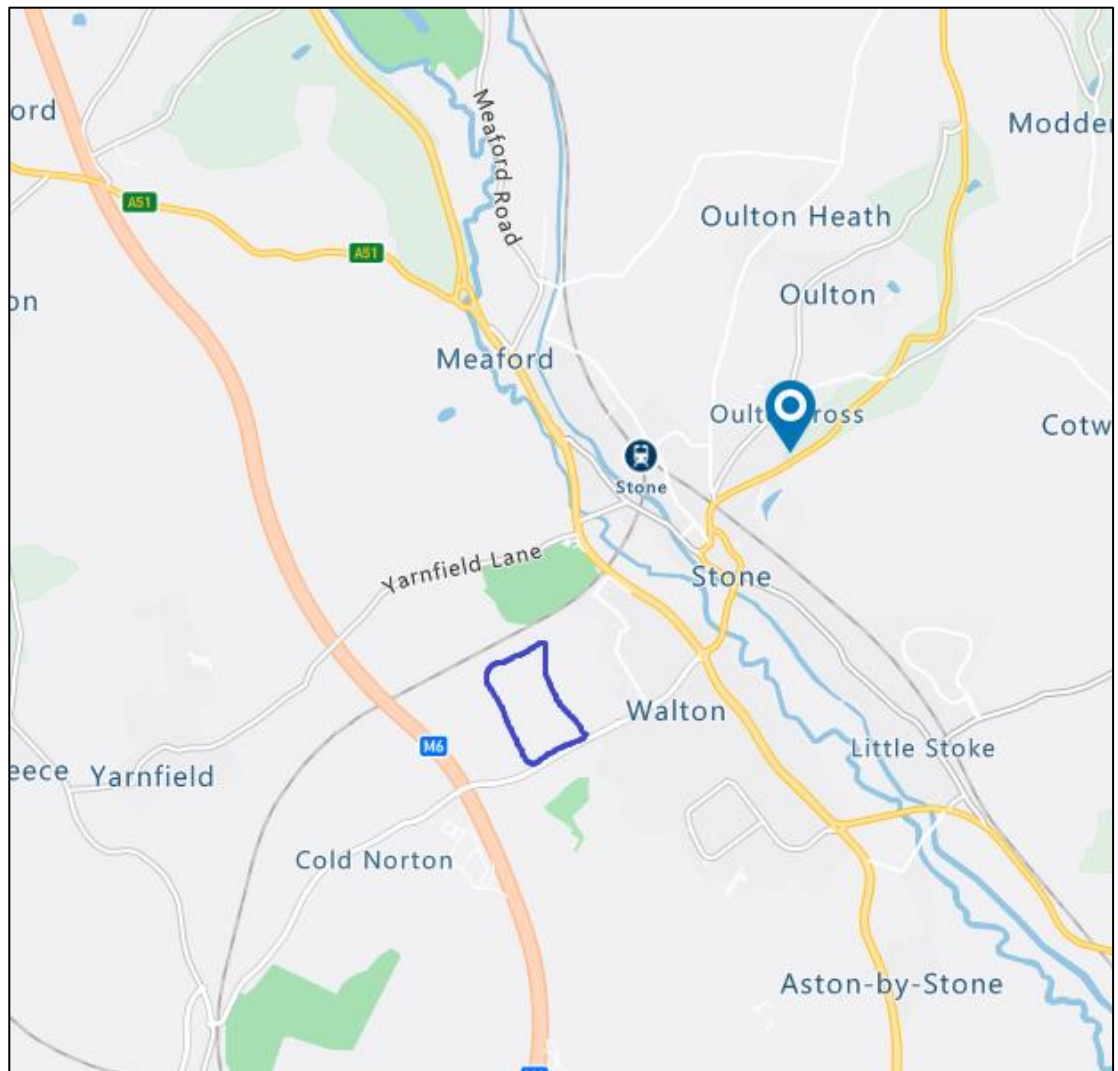
4.4.8. Further commentary regarding the demand for local middle school places and the wider implications for middle school place planning in the area is also set out later in this Assessment.

#### 4.5. Local Secondary School Locations

4.5.1. SCC defines 'Stone H Secondary' as the relevant local secondary / high school planning area and contains only the following high school:

- Alleyne's Academy

4.5.2. The broad locations of the closest local high schools are indicated below (any blue icons indicate single school locations and the blue-lined area is an indication of the approximate location of the Site):



**Graphic:** High school locations relative to the Site.

[Source: DfE website]



4.5.3. The only high school within the Stone H Secondary planning area is the following travel distance from the Site:

High School	Travel Distance from the Site (miles)
Alleyne's Academy	1.9

**Table:** Travel distances from the Site to secondary schools within the Stone H Secondary planning area, in order of increasing distance.

4.5.4. It is evident that the high school in the Stone H Secondary planning area is within 3 miles' travel distance of the Site.



4.5.5. The following map shows a 1.9-mile travel route from the Site to Alleyne's Academy:





#### 4.6. Local High Schools – Forecast Status of Pupil Places

4.6.1. The latest available high school forecasts were those submitted to the DfE as part of the annual school data submission in mid-2022, contained within what is known as the annual “SCAP”.

4.6.2. The forecast horizon until 2027/28 was that which was expected by the DfE when local education authorities submitted their high school forecast data in mid-2022.

4.6.3. The latest available SCC school data showing the forecast position of pupil places for the high school in the Stone H Secondary planning area was due to be as shown in the Table below:

School Planning Area (excluding sixth form)	Total Net Capacity	SCC Forecast Children on Roll			SCC Forecast Surplus / Deficit Places		
		23/24	25/26	27/28	23/24	25/26	27/28
Stone H Secondary	840	797	785	805	43	55	35

**Table:** Forecast position of pupil places for the high school in the Stone H Secondary planning area for academic years from 2023/24 to 2027/28, as provided by SCC.

[Source: School forecast data and capacity data at Appendices EHP05 and EHP06]

4.6.4. The above net capacity figure does not include any potential school expansions in the relevant Stone H Secondary planning area.

4.6.5. On the basis of these SCC forecasts for this high school it is evident that there were very few local high school places forecast to be available in the near future.

4.6.6. The number of surplus places was due to decrease slightly from **55 places** in 2025/26 to **35 places** in 2027/28, shortly after when the first dwellings on the Site would be built and occupied.

4.6.7. On the basis of these SCC forecasts it is evident that the percentage of surplus places was due to decrease slightly from **6.5%** in 2025/26 [*calculation: 55 / 840 = 6.5%*] to **4.2%** in 2027/28 [*calculation: 35 / 840 = 4.2%*].

4.6.8. It is also very important to emphasise that the SCC high school forecast data includes the impact of any residential sites which were consented as planning applications.

4.6.9. Further commentary regarding the demand for local high school places and the wider implications for high school place planning in the area is also set out later in this Assessment.



## 5. Primary and Secondary Education Mitigation

### 5.1. SCC Child Yield & Education Contributions Methodology

5.1.1.SCC provides the following approach with regarding how it currently assesses child yield from housing developments and any requests for S106 education contributions:

*“There are currently four primary areas and one High area where the PPR is higher (0.045 pupils per dwelling) than the standard PPR (0.03 pupils per dwelling). PPR’s are subject to change and will be reviewed as appropriate by analysing the number of pupils generated based on new housing completion data provided by each Local Planning Authority (LPA). In addition, if there is a change to school place planning clusters, a review of the PPR’s will automatically be undertaken and updated below as necessary.”*

*“This is based upon an assessment of children resident in new housing in each area.”*

*“The table below calculates the total number of pupils generated for each phase of education per 100 dwellings using both the standard PPR (0.03 pupils per dwelling) and the higher PPR (0.045 pupils per dwelling).”*

Phase of Education	Pupil Ages	Number of year groups	Total number of pupils generated from 100 dwellings using the:	
			standard PPR per dwelling of 0.03	higher PPR per dwelling of 0.045
Two tier system				
Primary schools	4 – 11	7	21	32
Infant schools	4 – 7	3	9	14
Junior schools	7 – 11	4	12	18
Secondary schools (no sixth form)	11 – 16	5	15	23
*Secondary schools (with sixth form)	11 - 18	6	18	27
3-tier system				
First schools	4 – 9	5	15	23
Middle schools	9 – 13	4	12	18
High schools (no sixth form)	13 – 16	3	9	14
*High school (with sixth form)	13 - 18	4	12	18

\* There are at least 2-year groups in Sixth Forms, but the total number of pupils generated is based on 1 year group, as average staying-on rates are around 50%.

[Source: SCC Education Infrastructure Contributions Policy, updated July 2022, at Appendix EHP07]





5.1.2.SCC provides the following Building Cost Multipliers with regards to the cost of providing additional school places where the expansion of an existing school is an option:

*“Where a specific project has not yet been costed, a cost multiplier is used to calculate the education infrastructure contribution required to mitigate against the impact of a development.*

*The mainstream BCM per pupil per phase of education are based on the cost of providing additional education infrastructure. The basis for the amount is all England average costs published annually by DfE, adjusted with the BCIS location factor. The DfE did not publish up-to-date costs in 2021 due to the impact of Covid-19. The latest available costs published in June 2020 have been adjusted for inflation based on the BCIS All-In TPI in line with DfE guidance.*

*The table below shows the latest BCM to be used.”*

<b>Phase of Education</b>	<b>Mainstream cost multiplier per pupil including weighting</b>
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

[Source: SCC Education Infrastructure Contributions Policy, updated July 2022, at Appendix EHP07]



## 5.2. Anticipated Child Yield of the Site

5.2.1. The Stafford area, which includes the location of Site, is one of the areas where SCC uses the standard PPR (0.03 pupils per dwelling per year group).

5.2.2. On the basis of the current SCC child yield methodology the Site with up to 478 dwellings would have the following child yield:

<b>Phase of Education</b>	<b>SCC Yield Rate (Per Dwelling)</b>	<b>Calculation</b> (Yield per house x Number of houses / flats)	<b>Child Yield</b>
First (4-9 years)	0.15	0.15 x 478 dwellings	<b>72</b>
Middle (9-13 years)	0.12	0.12 x 478 dwellings	<b>57</b>
Secondary / High School (13-16 years)	0.09	0.09 x 478 dwellings	<b>43</b>



### 5.3. Potential S106 Education Contributions

5.3.1. On the basis of the current SCC education contributions methodology the Site with up to 478 dwellings could potentially attract the following request for S106 contributions from SCC up to the following maximum total values using the following current SCC Building Cost Multipliers rates excluding indexation:

<b>Phase of Education</b>	<b>Cost Per Pupil</b>	<b>Calculation</b> (Child Yield x cost per additional pupil place)	<b>Potential Maximum S106 Education Infrastructure Contributions</b>
First (4-9 years)	£17,450	$(478 \times 0.15) \times$ £17,450	<b>£1,251,165</b>
Middle (9-13 years)	£20,738	$(478 \times 0.12) \times$ £20,738	<b>£1,189,531</b>
Secondary / High School (13-16 years)	£24,026	$(478 \times 0.09) \times$ £24,026	<b>£1,033,598</b>



#### 5.4. SCC's Commentary on the Potential Sites Consultation

5.4.1. In February 2022 SCC published its response to the SBC Potential Sites Consultation regarding the Stafford Borough Council Local Plan 2020-2040.

5.4.2. The SCC document sets out the following background:

*“Stafford Borough Council have asked SCC to consider the impact on education of sites identified in the SHELAA which includes 100 sites across Stafford totalling 17,523 dwellings, and 36 sites across Stone totalling 16,870 dwellings.*

*It is not possible to assess each site individually due to the number and range of sites, and the various combinations of sites that could be brought forward would have different education requirements. Once preferred options/sites have been identified more detail can be provided about the specific education requirements.*

*The information below gives an overview of the impact of residential development on a school place planning area basis to enable SBC to consider in conjunction with comments from other stakeholders to take an overall view on settlements/sites for the preferred options.*

*The response is based on current demographics and the assumption that not all the housing is delivered at the same time. Given the period that the revision of the Local Plan covers, circumstances may change which could change education infrastructure requirements.*

*High level indicative studies have been undertaken to assess the expansion potential of some existing schools for the purposes of this report. These studies advise whether a school site is (on paper) large enough to accommodate a bigger school based on standard land requirements as stated in DfE guidance ‘Area Guidelines for Mainstream Schools – Building Bulletin 103’. High level indicative studies do not take into account the configuration of the school buildings, use of outdoor spaces, capacity of coach parks, vehicular and/or pedestrian access, or the shape/contours/topography of the school site.”*

*“Comments for primary and secondary need to be read in conjunction with each other as it must be possible to mitigate development at all education phases.*

**Red** – No mitigation possible on existing sites at all required education phases

**Orange** – mitigation possible at all education phases but only in specific school catchment area within the planning area and/or with new school(s)

**Yellow** – mitigation possible at all education phases with capacity increases or potential expansions  
**Green** – mitigation possible at all education phases”

[Source: SCC's Commentary on the SBC Potential Sites Consultation, pages 1 and 5, at Appendix EHP08].



5.4.3. As stated earlier in this Assessment the Site is located in the SCC Stone Town Primary, Stone M Secondary and Stone H Secondary school planning areas.

5.4.4. SCC provided the following commentary on these school planning areas within the scope of the SBC Potential Sites Consultation:

Stone First and Middle Planning Areas		
First Planning Area	First School Capacity	First School Additional Notes / Associated High Planning Area
Stone Town  (7 First Schools)	Expected up to 1 FE available places across Stone Town First planning area schools based on current pupil movement and modelling.  High level indicative studies suggest some school sites may be large enough to accommodate limited expansion.	Whilst there may be some available first places in the planning area, the associated school(s) fall within the high school planning area of Stone High (Alleyne's Academy); <b>it is not possible to mitigate new homes at high phase.</b>

Stone and Surrounding Rural Area – see full text for settlements covered and schools within the planning areas		
<b>Stone High Planning Area</b>		
<p>1 High School</p> <p>Expected to be no available places across Stone High planning area based on current pupil movement and modelling.</p> <p>Additional high school places have recently been delivered at Alleyne's Academy to mitigate the impact of housing identified in the current adopted Local Plan. This school is split across 2 sites and high-level indicative studies suggest that on paper the high school site(s) are not large enough to accommodate any further expansion.</p> <p><b>All of the below first and middle planning areas below fall within the Stone High planning area.</b></p> <p><b>It is not possible to mitigate the impact of any further housing development in Stone High planning area and therefore development cannot be mitigated across all phases (First, Middle and High) for the areas below.</b></p>		
<b>Stone Middle Planning Area</b>		
<p>2 Middle Schools</p> <p>Expected to be no available places across Stone Middle planning area based on current pupil movement and modelling.</p> <p>Projects have recently been completed at both of the middle schools in this planning area which has allowed a small increase in capacity. High level indicative studies suggest that on paper there may be potential for limited further expansion at one of the schools, however this may not be practical or financially viable.</p> <p>Whilst there may be some limited potential to increase middle school places in this planning area, the associated school(s) fall within the high school planning area of Stone High (Alleyne's Academy); <b>it is not possible to mitigate new homes at high phase.</b></p> <p><b>All of the below first and middle planning areas below fall within the Stone High planning area.</b></p>		

[Source: SCC's Commentary on the Potential Sites Consultation, at Appendix EHP08].



5.4.5.SBC has since commented on this proposed development within the SBC Site Assessment Profiles document on the following basis:

<b>Site Selection Assessment</b>	
<b>Topic Area</b>	<b>Evaluation</b>
Education	<p><b>First School:</b> Manor Hill First School. Development cannot be accommodated within existing capacity; school could potentially be expanded.</p> <p><b>Middle School:</b> Walton Priory Middle School. Development can potentially be accommodated within existing capacity.</p> <p><b>High School:</b> Capacity at Alleyne's Academy to be confirmed.</p>
Transport	<p>Two access points required which are achievable. Developer would need to conduct a transport study into the impact on Walton roundabout/A34 to assess impact before site could be confirmed as developable.</p> <p><b>Accessibility Score:</b> 4/6</p>
Ecology	<p><b>Medium</b> overall ecological sensitivity.</p> <p><b>Red</b> Great Crested Newt risk impact zone.</p>
Landscape	<p><b>Medium</b> overall landscape sensitivity.</p>
Heritage	<p><b>Low</b> direct impacts, <b>Low</b> setting impacts.</p> <p><b>No substantial harm.</b></p>
Water	<p><b>Medium</b> potential impact on sewerage infrastructure.</p> <p><b>Low</b> potential impact on surface water sewerage infrastructure.</p>
Electricity	<p>No issues for this site.</p>

**Outcome of Assessment: Potential Site Option**

**Reasoning:** Education capacity constraints and transport concerns would need resolving.

5.4.6.We have reviewed the basis of this position within the context of our own analyses of the local education position and we set out our summary in the following sections.



#### 5.5. EHP Commentary & Conclusions on First & Middle Education Impact & Mitigation

5.5.1. As stated earlier, according to the SCC child yield methodology the Site with up to 478 dwellings would generate a need for up to **72 first school education places and 57 middle school education places.**

5.5.2. It is apparent that SCC previously raised some concerns about the ability of some local first and middle schools to undergo expansion if required.

5.5.3. However, it is also evident from the SBC Site Assessment Profiles document that SBC considers that the demand for first and middle school places arising from the Site can be accommodated at a local first school following the expansion of the school and at an existing local middle school without the need for expansion.

5.5.4. Having reviewed the details of these schools we concur with the SBC position.

5.5.5. In the event that the Site comes forward it is also therefore likely that SCC would seek the S106 first school education contributions identified earlier in our Assessment but potentially unlikely that SCC would seek any S106 middle school education contributions.

## 5.6. EHP Commentary & Conclusions on High School Education Impact & Mitigation

5.6.1. As stated earlier, according to the SCC child yield methodology the Site with up to 478 dwellings would generate a need for up to **43 high school education places**.

5.6.2. This section of our Assessment sets out our commentary on how sufficient mitigation could be provided to enable enough high school education places if this number of high schoolchildren were to arise as a result of the Site being built and occupied.

5.6.3. As also stated earlier, the number of surplus high school places was due to decrease slightly from **55 places** in 2025/26 to **35 places** in 2027/28, shortly after when the first dwellings on the Site would be built and occupied.

5.6.4. SCC state the Alleyne's Academy occupies two sites; the main school site being on Oulton Road in Stone with some sports provision located at Alleyne's Sports Centre a short distance further north along the same road. According to a [local press article](#) the sports centre along Oulton Road has been run for 50 years through a joint agreement between the school and SBC.

5.6.5. The following image shows the main site of Alleyne's Academy:





5.6.6. The map image shows the main site of Alleyne's Academy:



5.6.7. The following highlighted area shows the main site area of Alleyne's Academy:



5.6.8. It is evident that the total area of the main site of Alleyne's Academy is approximately **3.33 Hectares**.

5.6.9. According to the [SCC data submitted to the DfE](#) in 2022 **Alleyne's Academy has a current capacity of 900 high school (13-16) places and a total capacity of 1,012 places including sixth form**. For the purposes of this Assessment it has been assumed that all these pupils are educated at the main site.



5.6.10. According to current DfE guidance the following calculation methodology would need to be used to estimate the recommended total area required for a high school with sixth form:

<p><b>Total site area (m<sup>2</sup>) =</b></p> <p>from 9,000 + 50N up to 11,000 + 63N</p> <p>(N = Required Number of Pupil Places)</p>
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[Source: DfE Building Bulletin 103, page 44, attached at Appendix EHP12]

5.6.11. Based on the above DfE formula the size of a **high school including sixth form for 1,012 pupils** would be a **minimum area of 5.96Ha** [calculation: 9,000 + (50 x 1,012) = 59,600m<sup>2</sup>] up to a **maximum area of 7.48Ha** [calculation: 11,000 + (63 x 1,012) = 74,756m<sup>2</sup>].

5.6.12. On the above basis it is evident that **the 3.36Ha size of the current Alleyne's Academy main site is below the recommended range of site sizes suitable for a high school including sixth form for 1,012 pupils.**

5.6.13. However, the above range of DfE-recommended site areas would typically include all the necessary space for a range of outdoor physical education activities and it is evident that Alleyne's Academy uses a second site for some outdoor physical education at Alleyne's Sports Centre and grounds a short distance away.

5.6.14. If the DfE-recommended area for soft outdoor physical education is adjusted within the above formulae the minimum recommended site area for a high school with sixth form for 1,012 which used another location for all outdoor soft physical education would be a **minimum area of 1.81Ha** [calculation: (9,000 + (50 x 1,012)) - (6,000 + (35 x 1,012))] = 59,600m<sup>2</sup> - 41,420m<sup>2</sup> = 18,180m<sup>2</sup>][source: DfE Building Bulletin 103, page 44, attached at Appendix EHP12].

5.6.15. On the above basis it is evident that the 3.36Ha size of the current Alleyne's Academy site is significantly larger the recommended minimum site size of 1.81Ha suitable for a high school including sixth form for 1,012 pupils which would use another location for all outdoor soft physical education.

5.6.16. **On this basis it would appear that there could be a degree of flexibility on the main site for it to be able to accommodate a higher pupil capacity than its current figure of 1,012 places if additional teaching space is added.**

5.6.17. It should be noted that some outdoor physical education could still be possible on the existing main school site, notably on the existing playing fields in the southern area of the site, even after a potential expansion of the school's capacity.

5.6.18. Moreover, it is evident that part of the western area of the main site of the school uses teaching space which is situated across three floors, as is apparent from the following photo:



5.6.19. It is also evident that part of the eastern area of the main site of the school uses teaching space which is only situated across one floor, as is apparent from the following photo:



5.6.20. On this basis there may be scope to add further capacity at Alleynes Academy by potentially adding further teaching spaces along the eastern edge of the site within a new building of two or three storeys located on the site of the existing single-storey building.



- 5.6.21. It is evident that SCC has stated that *“high-level indicative studies suggest that on paper the high school site(s) are not large enough to accommodate any further expansion”* [source: SCC’s Commentary on the Potential Sites Consultation, at Appendix EHP08].
- 5.6.22. With this in mind we sent an FOI request to SCC requesting the details of any feasibility studies which could clearly indicate that potential further expansion of Alleyne’s Academy is not possible. SCC responded and no such feasibility study has yet been conducted regarding Alleyne’s Academy.
- 5.6.23. On the basis of our analyses and comments above **if the above potential mitigation option was indeed feasible and pursued then in our opinion there could be sufficient high school places available for the 43 high school places that SCC would predict would be needed by the Site.**
- 5.6.24. Whilst there are currently other residential sites in Stone which will give rise to the need for high school places (such as Land at Eccleshall Road, Land West of Longhope Drive in Walton Hill and St John’s Church, Granville Terrace) the impact of these sites on the demand for high school education places has already been taken into consideration within the current SCC forecasts and would not change SCC’s longer-term assessment of high school place planning as part of its education-related commentary to SBC during the Potential Sites Consultation.
- 5.6.25. On this basis in our opinion **it is not currently appropriate for SCC to conclude that Alleyne’s Academy cannot be expanded further on its existing main site unless a detailed feasibility study is undertaken and made available for scrutiny which would clearly indicate that potential further expansion of Alleyne’s Academy is not possible.**



## 6. Appendices

The following appendices accompany this document:

- APPENDIX EHP01 - DfE Securing Developer Contributions for Education (November 2019)
- APPENDIX EHP02 - DfE Home to School Travel and Transport Guidance (July 2014)
- APPENDIX EHP03 - DfE - School Capacity (SCAP) Survey 2022 - Guide for local authorities (May 2022)
- APPENDIX EHP04 - P19-1831\_04 Promotional Document LR (extract)
- APPENDIX EHP05 - SCC - school capacity and NOR data (May 2022)
- APPENDIX EHP06 - SCC - school forecast data (May 2022)
- APPENDIX EHP07 - SCC - Staffordshire-SEICP-March-2021-Version-1.2-Updated-July-2022
- APPENDIX EHP08 - SCC - Stafford-Borough-Education-Site-Assessment-report-Accessible
- APPENDIX EHP09 - Satellite Image - Alleyne's Academy site
- APPENDIX EHP10 - Map Image - Alleyne's Academy site
- APPENDIX EHP11 - Site Area - Alleyne's Academy main site
- APPENDIX EHP12 - DfE - Building Bulletin 103 - Area Guidelines for Mainstream Schools (June 2014)
- APPENDIX EHP13 - Photo Image - Alleyne's Academy (western entrance)
- APPENDIX EHP14 - Photo Image - Alleyne's Academy (eastern entrance)

# Eccleshall Road, Stone

## Walton Roundabout Study

Client:	Bloor Homes	Job No:	J324871
Date:	06 December 2022	File Name:	221206 324871 TN 005
Prepared by:	JEGB	Approved by:	BDF

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## 1.0 Introduction

### 1.1 Preamble

- 1.1.1 mode transport planning (mode) was commissioned by Bloor Homes to review the deliverability of a potential residential development located off Eccleshall Road, Stone from a highways and transport perspective.
- 1.1.2 The work to date has identified that the Walton Roundabout (A34/Eccleshall Road/Stafford Road) experiences capacity concerns which could impact not only the delivery of the proposed Bloor Homes site off Eccleshall Road but also any further development within the area.
- 1.1.3 The current issues experienced at the Walton Roundabout (capacity and non motorised user severance) are well established and known to both the Staffordshire County Council (SCC) in their role as the Local Highway Authority (LHA) and Local Planning Authority (LPA). To date, previous applications within Stone and the surrounding area, have simply provided minor kerb realignments at the junction and have provided financial contributions which SCC has pooled but is yet to spend and nor has an overarching mitigation scheme been identified to date.
- 1.1.4 As part of this work, extensive pre-application discussions have been undertaken with the LHA to discuss assessment parameters and design solutions to ensure a collaborative approach has been taken.
- 1.1.5 The purpose of this Technical Note (TN) is therefore to help support representations to the Local Plan for the proposed Bloor Homes site and to demonstrate that there is a workable solution to the Walton Roundabout thereby addressing existing issues as well as providing comfort that future development can be accommodated on the highway network.
- 1.1.6 This TN therefore provides a summary of the work to date which demonstrates that a new signalised roundabout scheme could be implemented at the junction alongside the parameters and assessment methodology that sit behind it, to provide surety to the LPA and LHA that a scheme could come forward as part of any future planning application on site and to support the allocation process.

## 2.0 Background Input

### 2.1 Traffic Surveys

2.1.1 Due to the age of the previous traffic flows used to assess the Walton Roundabout as part of the historical applications (13/19002/OUT – Walton Hill and 14/20854/OUT – Land at Common Lane), a revised traffic survey was undertaken at the Walton Roundabout on 12/05/2021.

2.1.2 This was discussed with SCC at the time as the survey was undertaken whilst the country was coming out of limited Covid 19 measures and was agreed to be acceptable subject to a review of the data in relation to historical turning flows and background traffic to provide a comparison.

2.1.3 The revised count indicated the following peak hour total junction movements (PCUs):

- AM 0800 – 0900 - 3,951
- PM 1700 – 1800 - 4,007

2.1.4 Previous totals taken from 2010 (again in PCUs) from the Transport Assessment (TA) associated with the 13/19002/OUT application are provided below:

- AM 0800 – 0900 - 3,951
- PM 1700 – 1800 - 4,122

2.1.5 The revised counts at the junction are broadly the same as the surveys recorded in 2010 (total junction movements). This could be considered 'normal' and not Covid related given that the A34 and Stafford Road (A520) links at the Walton Roundabout were shown to have reduced flows for the following periods based on the review of static Department for Transport (DfT) counters:

- A34 (DfT ref. 36361) – 9.5% reduction between 2013 and 2017
- A520 (DfT ref. 37295) – 10.5% reduction between 2007 – 2016

2.1.6 Clearly there was a natural decline in traffic at this location irrespective of Covid 19. The traffic counts detailed above were also based on actual recordings from the static counters rather than interpolations and forecasts.

2.1.7 A further assessment was undertaken to review the turning proportions at the junction to ensure that whilst the flows may be less/different, the actual movements and how vehicles traverse the junction are comparable.



2.1.8 This assessment showed that the turning proportions within the 2021 survey are consistent with the 2010 survey and therefore with this in mind and that the DfT fixed counters showing a natural decrease in base flows (even outside of Covid 19 conditions), the flows are considered representative of typical operation and therefore suitable to take forward in subsequent assessments.

## 2.2 Committed Development

2.2.1 The traffic from the adjacent Walton Hill development would need to be included as a committed development in any assessment of the junction. The original application was submitted with an upper limit of 500 dwellings, however through the following reserved matters applications, it has potentially increased to 581:

- 17/27052/REM - 198 dwellings
- 18/28191/REM - 81 dwellings
- 19/30440/REM - 302 dwellings
- **Total - 581 dwellings**

2.2.2 It has been confirmed that at the time of the May 2021 traffic count survey at Walton Roundabout, 264 dwellings were occupied and completed, therefore 317 dwellings are outstanding (based on the 581 total) and will represent the balance of dwellings that the associated traffic generation will need to be added to the junction for.

2.2.3 The traffic generation detailed within the associated TA for Walton Hill was much greater than an average trip rate that would typically be calculated using the TRICS database to draw in the latest tranche of survey sites. Therefore to provide an accurate forecast of the trip generation and the current characteristics of the existing Walton Hill scheme, turning count surveys were undertaken at the respective site accesses to the development.

2.2.4 This survey recorded the total arrivals and departures from the site (both accesses) and allowed a bespoke trip rate to be derived. A summary of the trip generation and resultant trip rates is provided in **Table 2.1** below.

**Table 2.1 Trip Generation and First Principles Trip Rates**

Time	AM (0800 – 0900)			PM (1700 – 1800)		
	Arrive	Depart	Two-way	Arrive	Depart	Two-way
0700 – 0800	66	85	151	83	73	156
0800 – 0900	53	116	169	102	56	158
0900 – 1000	66	70	136	74	45	119
1600 – 1700	0.250	0.322	0.572	0.314	0.277	0.591
1700 – 1800	0.201	0.439	0.640	0.386	0.212	0.598
1800 – 1900	0.250	0.265	0.515	0.280	0.170	0.451

2.2.5 The outstanding balance of dwellings (associated traffic generation) to come forward on this site and that would ultimately need to be added to the Walton Roundabout junction as a committed development, is 317 dwellings and the resultant trip generation of this is shown in **Table 2.2** below.

**Table 2.2 Trip Generation and First Principles Trip Rates**

Time	Arrive	Depart	Two-way
0800 – 0900	64	139	203
1700 – 1800	122	67	189

2.2.6 These flows have been distributed onto the network and added to the Walton Roundabout based on the distribution detailed in the respective TA that was submitted as part of the Walton Hill application and shown at **Appendix A**.

2.2.7 Traffic associated with the Common Lane application would have been included in the 2021 baseline traffic surveys and therefore not needed to be added in.

### 2.3 TEMPro Base Growth

2.3.1 The traffic associated with the committed developments in the vicinity of the site has been manually added to the network and will have been included, in part, within the TEMPro growth rates.

2.3.2 On this basis, alternative planning assumptions have been applied within TEMPro with the consented level of housing being removed from the background growth. The adjacent site (Walton Hill), the proposed site and the Walton Roundabout are all located within the Stafford 003 MSOA.

2.3.3 The considered/committed scheme of Walton Hill totals 581 dwellings. It was not possible to remove all the dwelling numbers for the committed/considered sites in the respective TEMPro query as there were not enough dwellings listed, therefore the dwellings were taken back to base level. For the period 2021 – 2031 (in Stafford 003), the base number of households was 5,074 with a future households of 5,381 (+307) given the level of consented schemes/units within this area, it was not possible to remove the actual number (581) so it has been assumed that there is no household growth (-307 removed).

2.3.4 Once the growth rates had been calculated, an adjustment was applied to provide a local growth rate. An NTM growth calculation for 'all – principle' roads has been weighted to each TEMPro growth rate to reflect the roads within the vicinity of the site. A summary of the respective growth factors is listed below:

- AM - 1.0405
- PM - 1.0378

2.3.5 The resultant future base line flows (2031) are shown in **Appendix A** inclusive of manual assignment of committed development traffic.

## 2.4 Base Test flows

2.4.1 The traffic associated with the outstanding balance of the Walton Hill scheme (317 dwellings) has been added to the revised 2031 base flows (AM and PM) to provide an effective future base year scenario as shown below:

- 2031 AM Base with Committed 0800-0900; and,
- 2031 PM Base with Committed 1700-1800.

# 3.0 Current operation of Walton Roundabout

## 3.1 Introduction

3.1.1 The operation and capacity of the Walton Roundabout in its current form has been reviewed using the industry standard software package JUNCTIONS 9. The geometry has been taken from a detailed topographical survey of the junction to reflect the current form and road markings.

- 3.1.2 When assessing junction capacity using JUNCTIONS 9 (non-signalised priority and roundabout junctions), it is generally accepted that a Ratio of Flow to Capacity (RFC) value of below 0.85 represents a junction that is considered to be operating satisfactorily (within practical capacity). At junctions operating at or close to zero practical reserve capacity, which equates to an RFC value of approximately 1.00 or above, small reductions in capacity may result in exponential queuing and/or delay results.
- 3.1.3 Therefore, junctions operating close to or above 1.00 should be carefully reviewed to ensure that queueing and delay is not significantly impacted upon, and to ensure that the new development will not have a 'severe' or 'detrimental' impact upon the existing highway infrastructure.
- 3.1.4 Validation of the 2021 baseline scenario models has been considered relative to observed queue surveys carried out simultaneously with the traffic surveys. Capacity corrections were manually applied to individual arms of the junction to more closely reflect the observed queuing conditions. These were assigned as a manual adjustment to intercept values to ensure the model presented surveyed conditions.

### 3.2 Capacity Assessment

- 3.2.1 A summary of the capacity assessment of the current roundabout layout for the 2021 observed base is shown in **Table 3.1** below.
- 3.2.2 This indicates that the current junction arrangement operates above the 0.85 RFC threshold and approaching the theoretical capacity (1.00 RFC) on all arms and is close to exceeding this value. In addition to this, the levels of delay are high on all arms.

**Table 3.1 2021 Observed Base Year (Existing Layout)**

Arm	AM Peak 0800 – 0900			PM Peak 1700 – 1800		
	RFC	End Queue	Delay	RFC	End Queue	Delay
Stafford Road	0.970	14.5	79.060	0.991	21.3	108.393
A34 (S)	0.955	15.0	45.567	0.984	27.1	66.600
Eccleshall Road	0.956	13.3	64.864	0.974	16.2	99.668
A34 (N)	0.984	22.0	68.598	0.971	19.7	65.710

3.2.3 A summary of the capacity assessment for the 2031 effective base (base with committed development) is shown in **Table 3.2** below. The committed development proposals only proposed minor kerb realignments at the junction to alleviate observed impact and therefore SCC agreed to take a monetary contribution which has been pooled but is yet to be spent and nor has an overarching mitigation scheme been identified to date. Accordingly the existing junction geometry has been assumed in this initial forecast.

**Table 3.2 2031 Future Base Year with Committed Development (Existing Layout)**

Arm	AM Peak 0800 – 0900			PM Peak 1700 – 1800		
	RFC	End Queue	Delay	RFC	End Queue	Delay
Stafford Road	1.093	66.7	328.180	1.116	81.7	380.555
A34 (S)	1.028	57.9	150.822	1.080	133.6	280.688
Eccleshall Road	1.164	132.0	520.136	1.056	47.9	243.670
A34 (N)	1.058	82.2	229.963	1.045	65.1	191.953

3.2.4 This indicates that the current junction arrangement would experience significant capacity, queuing and delay issues in the future base year scenario without any mitigation irrespective of the proposed site coming forward. The RFC values on all arms of the junction exceed the theoretical capacity (1.00).

3.2.5 This has been as the baseline position from which a nil detriment mitigation approach would be reviewed against.

### 3.3 Non Motorised User Facilities

3.3.1 The current arrangement of the Walton Roundabout represents a significant severance to non motorised users to traverse the junction towards the centre of Stone to access local facilities and public transport (bus stops and train station) along the east to west alignment.

3.3.2 This is due to the fact that the only crossing point is a pedestrian underpass on the northern arm of the junction with stepped access only. This is a particular issue for mobility impaired and cycle user groups without a realistic alternate to traverse the roundabout.

3.3.3 An image of this is shown in **Figure 3.1** below.

3.3.4 In terms of the planning applications that have come forward within Stone, no mitigation measures has been provided to address this.

Figure 3.1 Extract from Google Street View (2022) Showing Pedestrian Underpass



### 3.4 Historical Schemes

- 3.4.1 The current issues experienced at the Walton Roundabout (capacity and non motorised user severance) are well established and known to both the LHA and LPA and have been discussed during ongoing dialogue.
- 3.4.2 To date, previous applications within Stone and the surrounding area, have simply provided minor kerb realignments at the junction. These have also been supported through financial contributions which SCC has pooled but yet to spend and nor has an overarching mitigation scheme been identified to date.
- 3.4.3 SCC and the adjacent applications (13/19002/OUT and 14/20854/OUT) have also identified capacity issues at the Walton Roundabout junction with relatively little mitigation that could be provided, due to third-party land constraints.
- 3.4.4 For those applications SCC provided the following response:
- *“The current constraint of the A34/B5026 Walton Roundabout and its ability to accommodate additional vehicular traffic has been analysed by the use of transport modelling techniques which has included work undertaken in addition to that submitted by the applicant. This*

*modelling has demonstrated that this junction is currently operating over capacity at certain peak times and further traffic would exacerbate this situation. It is considered that the most appropriate way to accommodate the additional traffic generated by the development is to adopt a flexible mitigation approach. This is achieved by securing monies via a Section 106 agreement towards schemes detailed within the Stone Integrated Transport Strategy and/or potential future highway improvements at the A34/B5026 Walton roundabout.”*

- 3.4.5 The 13/19002/OUT adjacent scheme made a contribution of £200,000 towards an improvement scheme to this junction (not identified), £60,000 towards the Stafford Integrated Transport Strategy and an additional capacity improvement scheme was also provided (and is now implemented) at the A34/A51 roundabout (Aston Roundabout). Further to this, the 14/20854/OUT application provided a contribution of £55,000 towards to the Stafford Integrated Transport Strategy and provided no formal mitigation at the Walton Roundabout.
- 3.4.6 There is clearly an issue with the junction which needs to be addressed irrespective of any application coming forward or site being promoted. It is also understood that no wider scheme has been identified by the LPA/LHA as part of overarching works or with regards to monetary contributions.

## 4.0 Proposed Development & Traffic Generation

### 4.1 Introduction

- 4.1.1 The development proposals would comprise the construction of up to 570 dwellings and a 1FE primary school, with vehicular access to the site taken from Eccleshall Road to the south of the site.

### 4.2 Trip Generation

- 4.2.1 The previous assessments based the traffic generation on a TRICS assessment and a summary of the trip rates taken from this work is provided below in **Table 4.1**.

**Table 4.1 Previous TRICS Assessment**

	AM Peak 0800 – 0900			PM Peak 1700 – 1800		
	Arrive	Depart	Two-way	Arrive	Depart	Two-way
Trip Rate (per dwelling)	0.129	0.390	0.519	0.331	0.164	0.495
Trip Generation	74	222	296	189	93	282

4.2.2 The trip rates detailed above were generated in the absence of first principles data (traffic survey of Walton Hill). On this basis and given the first principles data that has been obtained from the adjacent scheme, the trip generation has been revised to use the new data which would provide a robust assessment. A summary of the trip generation (based on 570 dwellings) is provided below in **Table 4.2**.

**Table 4.2 Revised Trip Generation**

	AM Peak 0800 – 0900			PM Peak 1700 – 1800		
	Arrive	Depart	Two-way	Arrive	Depart	Two-way
Trip Rate (per dwelling)	0.201	0.439	0.640	0.386	0.212	0.598
Trip Generation	114	250	364	220	121	341

4.2.3 The traffic generation detailed above (**Table 4.2**) has been distributed using the previously determined assignment at the Walton Roundabout and shown in **Appendix A**. This results in 88.3% of traffic being routed to the Walton Roundabout due to the nature of the adjacent highway network. The trips have been added to the 2031 effective base flows to provide a ‘with development’ scenario for the purposes of this note and to provide a review of the potential mitigation scenario.

## 5.0 Proposed Signalised Scheme

### 5.1 Introduction

5.1.1 A full roundabout mitigation has been proposed that involves the signalisation of the current roundabout junction which can be provided wholly within highway controlled land, provides wider benefit to the local area, facilitates the proposed development and provides a significant betterment to the current facilities for NMU.

5.1.2 This section reviews the proposed scheme in terms of layout and operation.

### 5.2 Proposed Signalised Scheme

5.2.1 The proposed signalised scheme is shown in **Drawing WS-LE-GEN-XX-DR-CE-100-S2-A1-A - General Arrangement** shown at **Appendix B**. This has been designed through an iterative process of testing the signal timings/stages, lane width/geometries, turning lanes and stacking space within the junction against the various flows.

5.2.2 A summary of the key scheme/NMU improvements is provided below:



- Removal of pedestrian underpass; and,
- Dedicated at grade pedestrian crossings with central waiting areas.

### 5.3 Capacity Assessment

5.3.1 The revised junction arrangement has been assessed using LinSig to review the capacity. The following scenario has been tested:

- 2031 base with committed + 570 dwellings;

5.3.2 A summary of the results is provided below in **Table 5.1** and the full output is attached at **Appendix C**.

**Table 5.1 LinSig Summary of Capacity Results 2031 Base with Committed and 570 Units**

	+570 dwellings	
	AM	PM
Overall Junction	95.7%	95.9%
PRC	-6.4	-6.5

5.3.3 The capacity results indicate the revised scheme outlined above provides betterment at the junction in terms of capacity when compared to the respective 2031 future base scenario i.e a nil detriment position and has been based on the proposed quantum of development (570 dwellings).

5.3.4 The method of control involves running north-south and east-west movements at the same time interspaced by a clearance stage each time. This will mean that the internal circulatory lanes will need a louvre on the green aspect to reduce see-through problems on the approaches. There are examples of this elsewhere as shown in **Figure 5.1** which is taken from the Leeds Ring Road.

5.3.5 In terms of the proposed junction, the right turn movements don't clear through the junction in one stage, but the ahead movements do. The right turns have a short delay on the second set of signals. The internal queues have been checked and the back of the queue each time moves off before the next inbound platoon wave arrives (i.e. the stop lines on the circulatory do not block traffic entering or passing through the roundabout due to queueing vehicles).

5.3.6 **Table 5.1** alongside the full outputs attached at **Appendix C** indicate that the revised scheme provides betterment for the junction against the current arrangement. Whilst the capacities recorded approach 100% these are better than the capacities recorded for the existing roundabout for the 2031 effective base year scenario (**Table 3.2**) and achieve nil detriment.

Figure 5.1 Example of Signalised Scheme and Signal Head (A6120)



## 5.4 Road Safety Audit

5.4.1 A Stage 1 Road Safety Audit (RSA) has also been undertaken on the proposed scheme to supplement the initial design work and aid SCC in their review of the junction arrangement.

5.4.2 A copy of this and the resultant Designer's Response is attached at **Appendix D**.

5.4.3 The RSA identifies various concerns associated with the proposed design, some of which are inherited from the existing scenario. The Designer's Response that has been prepared seeks to address and support the recommendations made by the audit along with providing further justification / clarification on a small number of points that have been challenged by the designer.

5.4.4 For the avoidance of doubt, the modelled junction is represents the layout following the comments from the RSA.

## 5.5 Departure Summary

5.5.1 To further aid the review of the proposed junction a design review has been undertaken on both the proposed and existing roundabout junctions with regards to any potential departure from standards. These drawings and subsequent summaries, are attached at **Appendix E**.

## 5.6 Summary

- 5.6.1 The proposed signal scheme offers betterment when compared to the current roundabout arrangement and achieves a better than nil detriment position against the 2031 effective base scenario and can be delivered wholly within highway controlled land.
- 5.6.2 Not only is there a betterment in capacity terms but there is also a significant improvement for NMU, with the introduction of an at grade pedestrian crossing on the A34 arm of the junction. This can link into the wider package of measures provided as part of the Stafford Integrated Transport Strategy within the local area which has always been impacted by this junction and underpass.

# 6.0 Summary and Conclusion

## 6.1 Summary

- 6.1.1 The existing arrangement of the Walton Roundabout is highly constrained and presents a limiting factor to the deliverability of any further development within Stone coming forward but also the baseline traffic which experiences congestions currently and is forecast to get worse if no intervention is provided.
- 6.1.2 To date, previous applications within Stone and the surrounding area, have simply provided minor kerb realignments at the junction and have also been supported through financial contributions which SCC has pooled but yet to spend and nor has an overarching mitigation scheme been identified to date. Based on this the situation is unlikely to improve and could be the limiting factor on any development coming forward within the local area.
- 6.1.3 This TN has therefore demonstrated that a signalised scheme can be provided to accommodate up to 570 dwellings as part of the proposed site but also the future base year and committed background traffic to achieve a better than nil detriment position. This can also be provided wholly within the highway boundary to ensure it could be delivered going forward.
- 6.1.4 Not only is there a betterment in capacity terms but there is also a significant improvement for NMU with the removal of the severed link at the junction itself with the current underpass. This can link into the wider package of measures provided as part of the Stafford Integrated Transport Strategy within the local area which has always been impacted by this junction and underpass.

## 6.2 Conclusion

- 6.2.1 In summary a potential mitigation scheme can be provided at the Walton Roundabout junction which significantly improves the current and predicted future year scenarios and provides a better than nil detriment position to both NMU and vehicles.

# APPENDICES

# APPENDIX A

## Traffic Flows

A Stafford Road  
B The Fillybrooks (A34) (SOUTH)  
C Eccleshill Road  
D The Fillybrooks (A34) (NORTH)

AM Peak 2021 (BASE) 0800 - 0900

Totals table with columns A, B, C, D, Total. Values: A: 288, B: 295, C: 308, D: 30, Total: 693.

HGV Totals table with columns A, B, C, D, Total. Values: A: 17, B: 1, C: 10, D: 0, Total: 28.

PM Peak 2021 (BASE) 1700 - 1800

Totals table with columns A, B, C, D, Total. Values: A: 263, B: 307, C: 222, D: 30, Total: 794.

HGV Totals table with columns A, B, C, D, Total. Values: A: 7, B: 0, C: 7, D: 0, Total: 14.

AM Peak 2031

Totals table with columns A, B, C, D, Total. Values: A: 298, B: 307, C: 330, D: 99, Total: 721.

HGV Totals table with columns A, B, C, D, Total. Values: A: 18, B: 1, C: 10, D: 5, Total: 34.

PM Peak 2031

Totals table with columns A, B, C, D, Total. Values: A: 273, B: 301, C: 237, D: 94, Total: 794.

HGV Totals table with columns A, B, C, D, Total. Values: A: 7, B: 0, C: 7, D: 1, Total: 14.

2031 BASE

PCU table for 2031 BASE with columns A, B, C, D, Total. Values: A: 316, B: 336, C: 349, D: 99, Total: 794.

PCU table for PM Peak 2031 with columns A, B, C, D, Total. Values: A: 280, B: 290, C: 237, D: 94, Total: 794.

Comm

Consented (Balance 317) AM PCU table with columns A, B, C, D, Total. Values: A: 0, B: 0, C: 0, D: 0, Total: 0.

HGV table for Consented (Balance 317) AM with columns A, B, C, D, Total. Values: A: 0, B: 0, C: 0, D: 0, Total: 0.

Consented (Balance 317) PM

Consented (Balance 317) PM PCU table with columns A, B, C, D, Total. Values: A: 0, B: 0, C: 0, D: 0, Total: 0.

HGV table for Consented (Balance 317) PM with columns A, B, C, D, Total. Values: A: 0, B: 0, C: 0, D: 0, Total: 0.

2031 BASE + Comm

2031 + Consented (Balance 317) AM PCU table with columns A, B, C, D, Total. Values: A: 336, B: 336, C: 349, D: 99, Total: 893.

HGV table for 2031 + Consented (Balance 317) AM with columns A, B, C, D, Total. Values: A: 0, B: 0, C: 0, D: 0, Total: 0.

2031 + Consented (Balance 317) PM

2031 + Consented (Balance 317) PM PCU table with columns A, B, C, D, Total. Values: A: 390, B: 246, C: 237, D: 94, Total: 794.

HGV table for 2031 + Consented (Balance 317) PM with columns A, B, C, D, Total. Values: A: 0, B: 0, C: 0, D: 0, Total: 0.

DEV 570

Development - 570 AM PCU table with columns A, B, C, D, Total. Values: A: 0, B: 0, C: 67, D: 0, Total: 67.

HGV table for Development - 570 AM with columns A, B, C, D, Total. Values: A: 0, B: 0, C: 0, D: 0, Total: 0.

Development - 570 PM

Development - 570 PM PCU table with columns A, B, C, D, Total. Values: A: 0, B: 0, C: 32, D: 0, Total: 32.

HGV table for Development - 570 PM with columns A, B, C, D, Total. Values: A: 0, B: 0, C: 0, D: 0, Total: 0.

DEV 700

Development - 700 AM PCU table with columns A, B, C, D, Total. Values: A: 0, B: 0, C: 82, D: 0, Total: 82.

HGV table for Development - 700 AM with columns A, B, C, D, Total. Values: A: 0, B: 0, C: 0, D: 0, Total: 0.

Development - 700 PM

Development - 700 PM PCU table with columns A, B, C, D, Total. Values: A: 0, B: 0, C: 39, D: 0, Total: 39.

HGV table for Development - 700 PM with columns A, B, C, D, Total. Values: A: 0, B: 0, C: 0, D: 0, Total: 0.

DEV 800

Development - 800 AM PCU table with columns A, B, C, D, Total. Values: A: 0, B: 0, C: 94, D: 0, Total: 94.

HGV table for Development - 800 AM with columns A, B, C, D, Total. Values: A: 0, B: 0, C: 0, D: 0, Total: 0.

Development - 800 PM

Development - 800 PM PCU table with columns A, B, C, D, Total. Values: A: 0, B: 0, C: 45, D: 0, Total: 45.

HGV table for Development - 800 PM with columns A, B, C, D, Total. Values: A: 0, B: 0, C: 0, D: 0, Total: 0.

DEV 900

Development - 900 AM PCU table with columns A, B, C, D, Total. Values: A: 0, B: 0, C: 105, D: 0, Total: 105.

HGV table for Development - 900 AM with columns A, B, C, D, Total. Values: A: 0, B: 0, C: 0, D: 0, Total: 0.

Development - 900 PM

Development - 900 PM PCU table with columns A, B, C, D, Total. Values: A: 0, B: 0, C: 51, D: 0, Total: 51.

HGV table for Development - 900 PM with columns A, B, C, D, Total. Values: A: 0, B: 0, C: 0, D: 0, Total: 0.

DEV 1000

Development - 1000 AM PCU table with columns A, B, C, D, Total. Values: A: 0, B: 0, C: 117, D: 0, Total: 117.

HGV table for Development - 1000 AM with columns A, B, C, D, Total. Values: A: 0, B: 0, C: 0, D: 0, Total: 0.

Development - 1000 PM

Development - 1000 PM PCU table with columns A, B, C, D, Total. Values: A: 0, B: 0, C: 56, D: 0, Total: 56.

HGV table for Development - 1000 PM with columns A, B, C, D, Total. Values: A: 0, B: 0, C: 0, D: 0, Total: 0.

2031 BASE + Comm + 570 Dev

2031 + Consented (Balance 317) + 570 DEV AM PCU table with columns A, B, C, D, Total. Values: A: 336, B: 336, C: 435, D: 99, Total: 893.

HGV table for 2031 + Consented (Balance 317) + 570 DEV AM with columns A, B, C, D, Total. Values: A: 0, B: 0, C: 0, D: 0, Total: 0.

2031 + Consented (Balance 317) + 570 DEV PM

2031 + Consented (Balance 317) + 570 DEV PM PCU table with columns A, B, C, D, Total. Values: A: 390, B: 246, C: 278, D: 94, Total: 794.

HGV table for 2031 + Consented (Balance 317) + 570 DEV PM with columns A, B, C, D, Total. Values: A: 0, B: 0, C: 0, D: 0, Total: 0.

2031 BASE + Comm + 800 Dev

2031 + Consented (Balance 317) + 800 DEV AM PCU table with columns A, B, C, D, Total. Values: A: 336, B: 336, C: 462, D: 99, Total: 893.

HGV table for 2031 + Consented (Balance 317) + 800 DEV AM with columns A, B, C, D, Total. Values: A: 0, B: 0, C: 0, D: 0, Total: 0.

2031 + Consented (Balance 317) + 800 DEV PM

2031 + Consented (Balance 317) + 800 DEV PM PCU table with columns A, B, C, D, Total. Values: A: 390, B: 246, C: 291, D: 94, Total: 794.

HGV table for 2031 + Consented (Balance 317) + 800 DEV PM with columns A, B, C, D, Total. Values: A: 0, B: 0, C: 0, D: 0, Total: 0.

2031 BASE + Comm + 1000 Dev

2031 + Consented (Balance 317) + 1000 DEV AM PCU table with columns A, B, C, D, Total. Values: A: 336, B: 336, C: 489, D: 99, Total: 893.

HGV table for 2031 + Consented (Balance 317) + 1000 DEV AM with columns A, B, C, D, Total. Values: A: 0, B: 0, C: 0, D: 0, Total: 0.

2031 + Consented (Balance 317) + 1000 DEV PM

2031 + Consented (Balance 317) + 1000 DEV PM PCU table with columns A, B, C, D, Total. Values: A: 390, B: 246, C: 302, D: 94, Total: 794.

HGV table for 2031 + Consented (Balance 317) + 1000 DEV PM with columns A, B, C, D, Total. Values: A: 0, B: 0, C: 0, D: 0, Total: 0.

2031 BASE + Comm + 300 Dev

2031 + Consented (Balance 317) + 300 DEV AM PCU table with columns A, B, C, D, Total. Values: A: 336, B: 336, C: 403, D: 99, Total: 893.

HGV table for 2031 + Consented (Balance 317) + 300 DEV AM with columns A, B, C, D, Total. Values: A: 0, B: 0, C: 0, D: 0, Total: 0.

2031 + Consented (Balance 317) + 300 DEV PM

2031 + Consented (Balance 317) + 300 DEV PM PCU table with columns A, B, C, D, Total. Values: A: 390, B: 246, C: 263, D: 94, Total: 794.

HGV table for 2031 + Consented (Balance 317) + 300 DEV PM with columns A, B, C, D, Total. Values: A: 0, B: 0, C: 0, D: 0, Total: 0.

DEV 300

Development - 300 AM PCU table with columns A, B, C, D, Total. Values: A: 0, B: 0, C: 35, D: 0, Total: 35.

HGV table for Development - 300 AM with columns A, B, C, D, Total. Values: A: 0, B: 0, C: 0, D: 0, Total: 0.

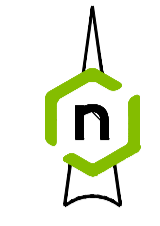
Development - 300 PM

Development - 300 PM PCU table with columns A, B, C, D, Total. Values: A: 0, B: 0, C: 17, D: 0, Total: 17.

HGV table for Development - 300 PM with columns A, B, C, D, Total. Values: A: 0, B: 0, C: 0, D: 0, Total: 0.

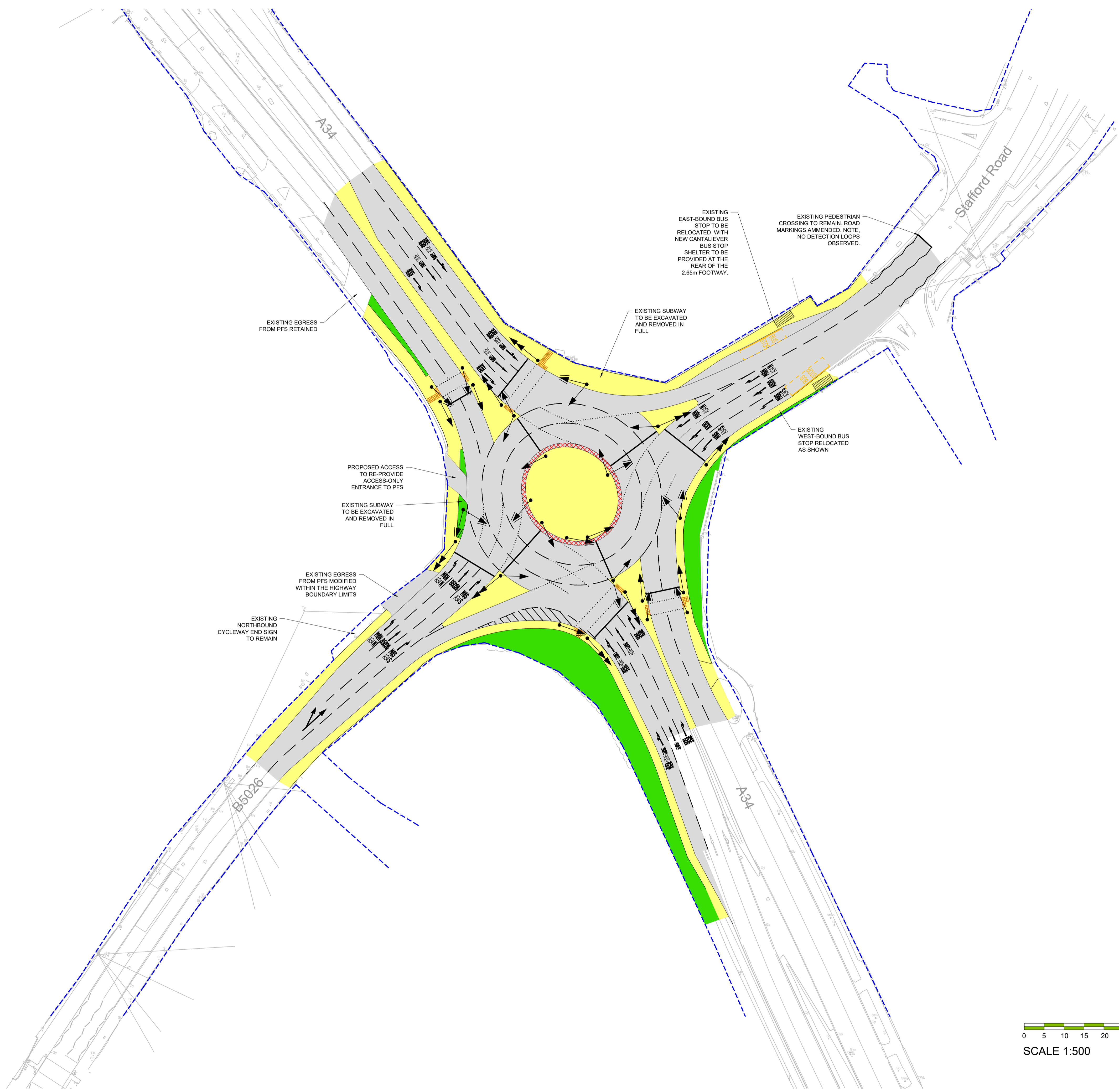
# APPENDIX B

GA



GENERAL NOTES

1. THIS DRAWING SHOULD NOT BE REPRODUCED IN WHOLE OR PART WITHOUT THE WRITTEN CONSENT OF LINK ENGINEERING.
2. DO NOT SCALE FROM THIS DRAWING. UNITS ARE IN METRES UNLESS OTHERWISE SPECIFIED.
3. THE CONTRACTOR IS TO CHECK ALL INFORMATION PROVIDED PRIOR TO COMMENCING WORKS AND SEEK CLARIFICATION FROM THE ENGINEER IN RESPECT TO ANY AMBIGUITIES FOUND.
4. THIS DRAWING SHOULD BE READ IN CONJUNCTION WITH ALL OTHER SCHEME SPECIFIC DRAWINGS.
5. ALL ADOPTABLE HIGHWAY WORKS SHALL BE ADOPTED VIA THE HIGHWAY AUTHORITY ACT 1980.
6. ADOPTED HIGHWAYS SHALL BE DESIGNED IN ACCORDANCE WITH THE DEPARTMENT FOR TRANSPORT'S DESIGN MANUAL FOR ROADS AND BRIDGES AND/OR SHALL COMPLY WITH THE ADOPTING LOCAL HIGHWAY AUTHORITY'S DESIGN GUIDANCE WHERE APPLICABLE.
7. ADOPTED HIGHWAYS TO BE IN ACCORDANCE WITH THE MANUAL CONTRACT DOCUMENTS FOR HIGHWAY WORKS HIGHWAY CONSTRUCTION DETAILS (HCD) AND THE SPECIFICATIONS FOR HIGHWAY WORKS (SHW) AND/OR SHALL COMPLY WITH THE ADOPTING LOCAL HIGHWAY AUTHORITY'S STANDARDS WHERE APPLICABLE.
8. ALL MATERIALS, INCLUDING SUB-GRADE WITHIN 450mm OF THE FINISHED ROAD LEVEL SHALL BE NON-FROST SUSCEPTIBLE.
9. ANY EXISTING HARD SURFACES TO BE REMOVED CAN BE CRUSHED FOR REUSE AS CAPPING OR OTHER FILL MATERIAL SUBJECT TO GRADING AND APPROVAL RELEVANT ADOPTING AUTHORITY.
10. TIE-INS TO EXISTING PAVEMENTS SHALL BE STEPPED IN CONSTRUCTION WITH MINIMUM 300mm WIDE STEPS TO EACH PAVEMENT LAYER AND BITUMINOUSLY SEALED.
11. ALL BOUND SURFACES SHALL BE TREATED WITH POLYMER MODIFIED BOND OR TACK COAT PRIOR TO PLACING OF EACH SUCCESSIVE LAYER TO BS434 AND IN ACCORDANCE WITH SHW CLAUSE 920.
12. BOUND BITUMINOUS BASE LAYERS IN EXCESS OF A TARGET 150mm THICKNESS SHALL BE LAID IN TWO SEPARATE LAYERS.
13. ALL TRAFFIC SIGNS AND ROAD MARKINGS SHALL BE PROVIDED IN ACCORDANCE WITH THE TRAFFIC SIGNS REGULATIONS AND GENERAL DIRECTIONS 2016 (INCLUDING SUBSEQUENT AMENDMENTS 1 & 2) AND THE CORRESPONDING TRAFFIC SIGNS MANUALS.
14. ALL ADOPTABLE STREETLIGHTING SHALL BE DESIGNED IN ACCORDANCE WITH THE ADOPTING LOCAL HIGHWAY AUTHORITY'S DESIGN GUIDANCE WHERE APPLICABLE. LIGHTING SHALL BE DESIGNED TO BS 5489 (2013) AND BS EN 13201 (2015) FOR THE APPROPRIATE ROUTE CLASSIFICATION.



**KEY**

	CARRIAGEWAY
	CARRIAGEWAY (HGV OVER-RUN STRIP)
	FOOTWAY / SPLITTER ISLAND
	VERGE
	EXISTING HIGHWAY BOUNDARY
	PROPOSED PRIMARY SIGNAL HEAD
	PROPOSED DOUBLE HEIGHT SIGNAL HEAD
	PROPOSED SECONDARY SIGNAL HEAD

A	UPDATED AS PER RSA COMMENTS	27.07.22	RCG
-	INITIAL ISSUE:	29.06.22	RCG
Rev.	Amendments	Date	By

Revisions

Client

**BLOOR HOMES**

**Link**  
ENGINEERING

Project  
WALTON ROUNDABOUT, STONE

Drawing  
GENERAL ARRANGEMENT

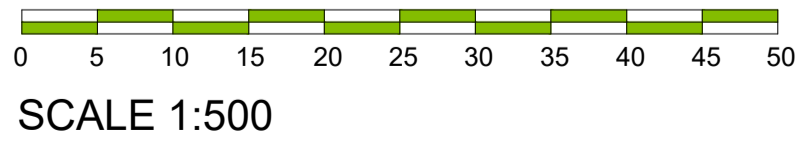
Scale @ A1  
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Drawn  
JWM

Checked  
RCG

Rev  
A

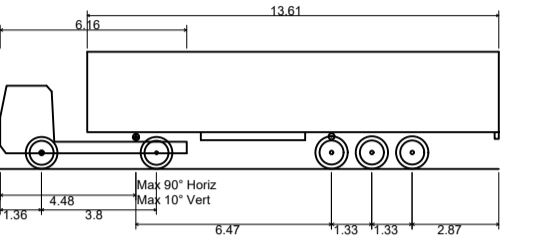
PROJECT INFORMATION (S2)



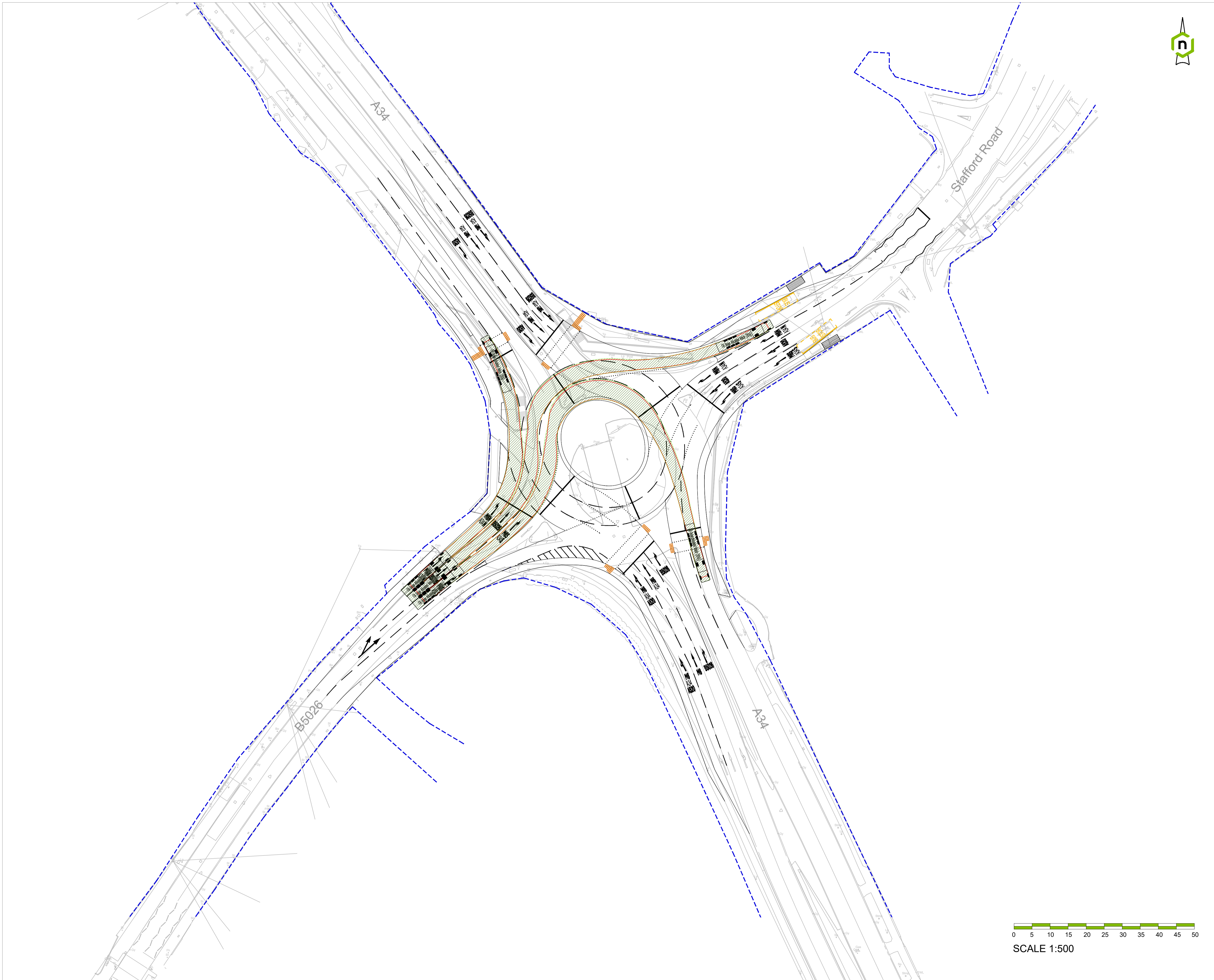


GENERAL NOTES

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FTA Design Articulated Vehicle (2006)	16.480m
Overall Length	2.550m
Overall Width	3.870m
Overall Body Height	0.515m
Min Body Ground Clearance	2.470m
Max Track Width	3.05m
Lock to lock time	6.600m
Kerb to Kerb Turning Radius	



B	UPDATED AS PER RSA COMMENTS	27.07.22	RCG
A	KERBING LAYOUT SHOWN	14.07.22	JSJ
-	INITIAL ISSUE	29.06.22	JKP
Rev.	Amendments	Date	By

Revisions

Client

**BLOOR HOMES**

**Link**  
ENGINEERING

Project  
WALTON ROUNDABOUT, STONE

Drawing  
PROPOSED ROUNDABOUT  
SWEEP PATH ANALYSIS  
SHEET 1 OF 5

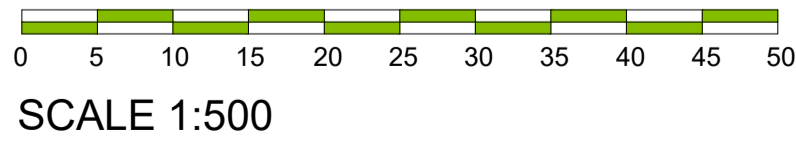
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Drawn  
JKP

Checked  
RCG

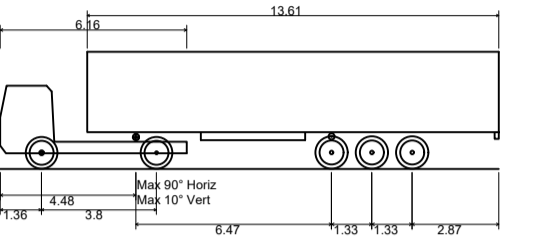
Rev  
B

PROJECT: WALTON ROUNDABOUT, STONE  
DRAWING: PROPOSED ROUNDABOUT SWEEP PATH ANALYSIS  
SHEET 1 OF 5  
DATE: 27.07.22  
STATUS: FOR INFORMATION (S2)

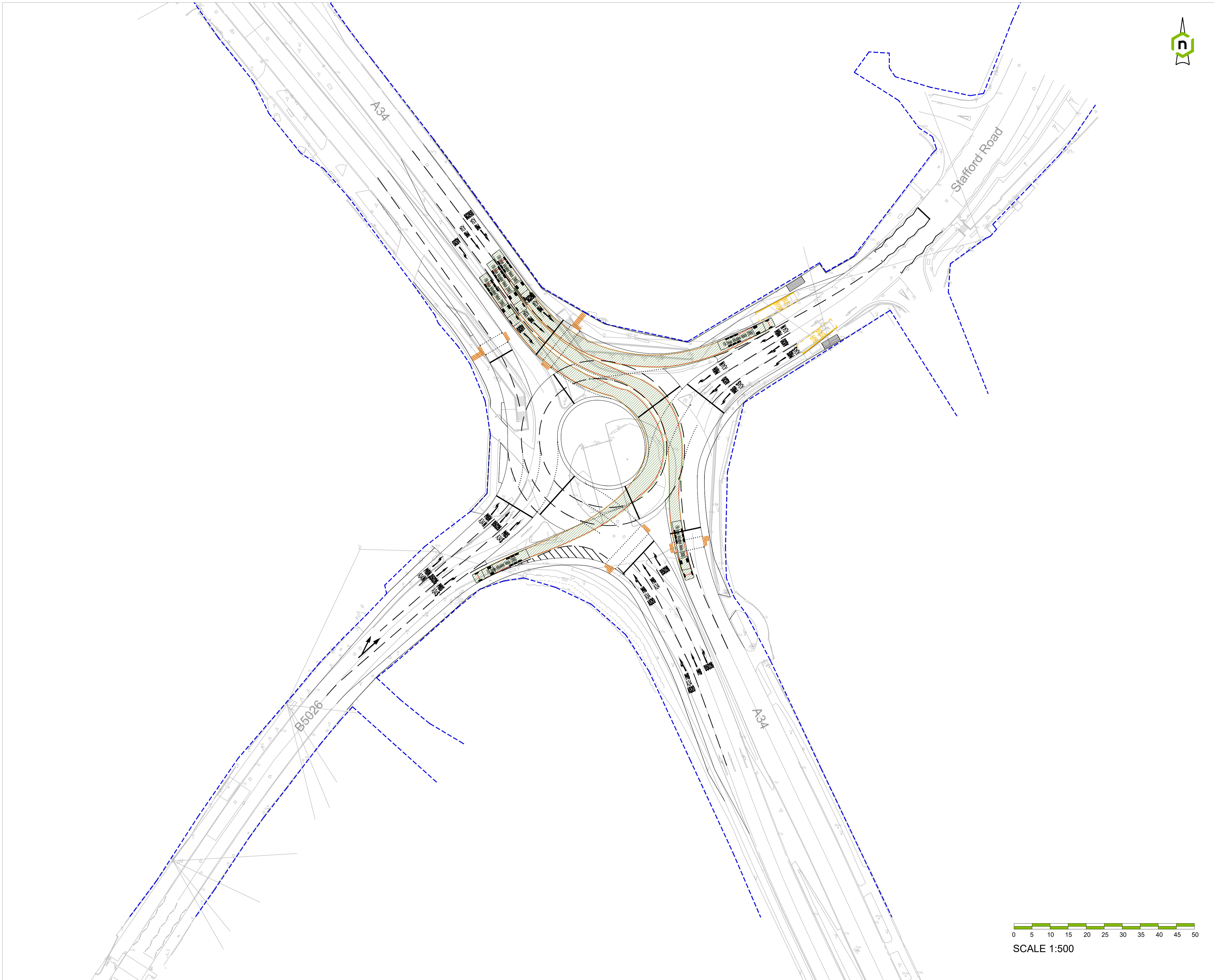


GENERAL NOTES

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Overall Length	2.550m
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Min Body Ground Clearance	2.470m
Max Track Width	3.05s
Lock to lock time	6.600m
Kerb to Kerb Turning Radius	



B	UPDATED AS PER RSA COMMENTS	27.07.22	RCG
A	KERBING LAYOUT SHOWN	14.07.22	JSJ
-	INITIAL ISSUE	29.06.22	JKP
Rev.	Amendments	Date	By

Revisions

Client

Project

Project  
 WALTON ROUNDABOUT, STONE

Drawing  
 PROPOSED ROUNDABOUT  
 SWEEP PATH ANALYSIS  
 SHEET 2 OF 5

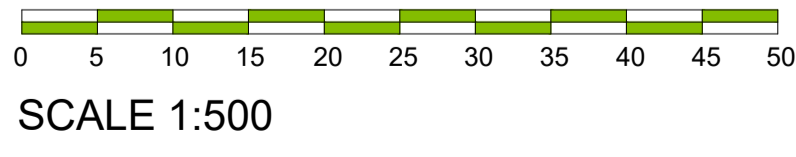
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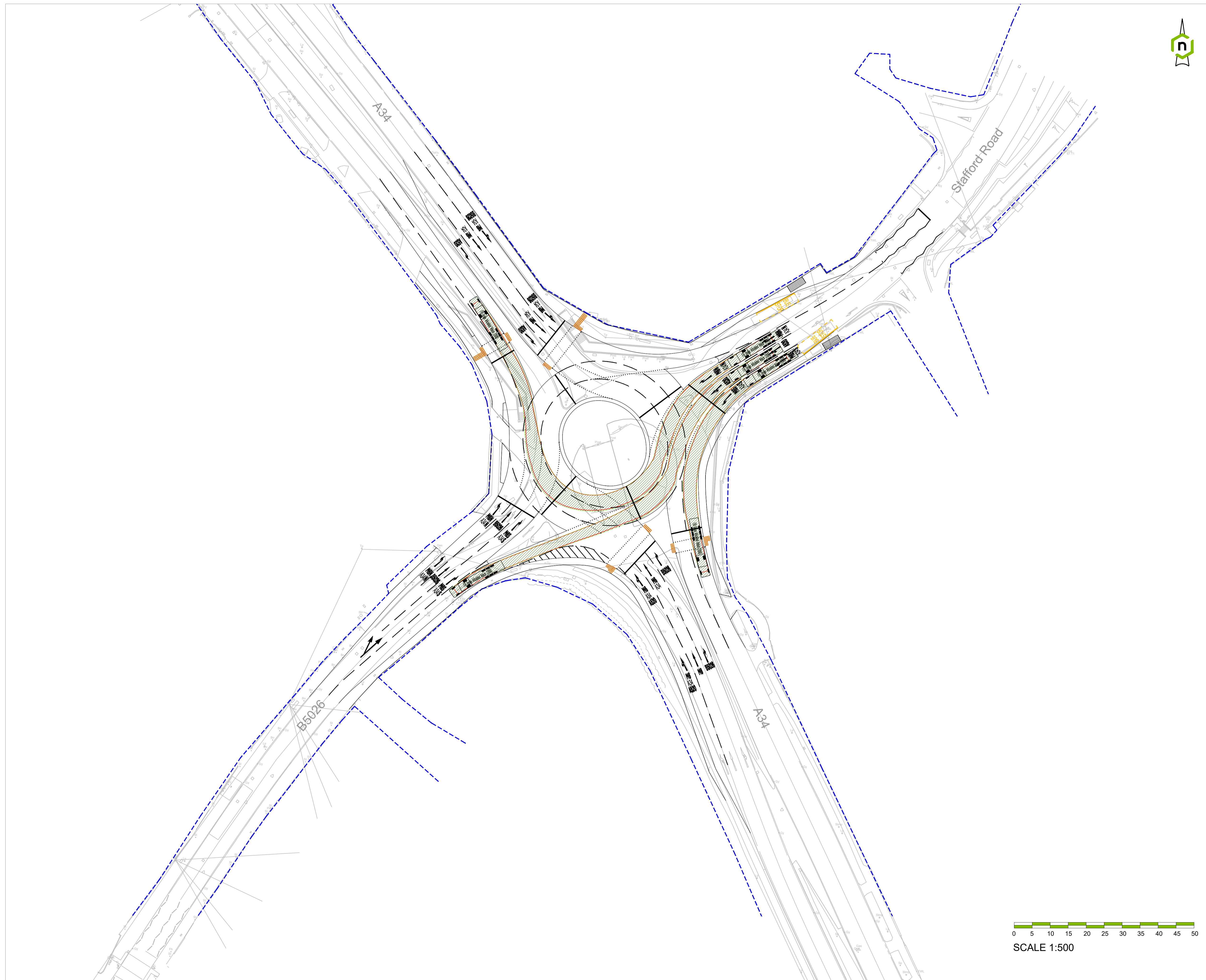
Drawn  
 JPK

Checked  
 RCG

Rev  
 B

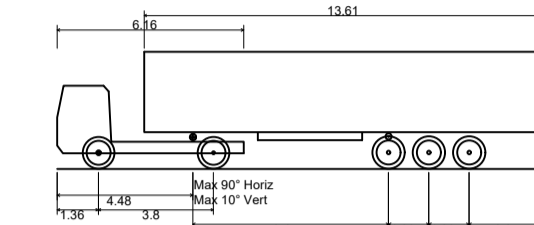
PROJECT: WALTON ROUNDABOUT, STONE  
 DRAWING: PROPOSED ROUNDABOUT SWEEP PATH ANALYSIS SHEET 2 OF 5  
 STATUS: INFORMATION (G2)





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Overall Body Height	0.515m
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Max Track Width	3.05m
Lock to lock time	6.600m
Kerb to Kerb Turning Radius	

B	UPDATED AS PER RSA COMMENTS	27.07.22	RCG
A	KERBING LAYOUT SHOWN	14.07.22	JSJ
-	INITIAL ISSUE	29.06.22	JKP
Rev.	Amendments	Date	By

Revisions

Client

**BLOOR HOMES**

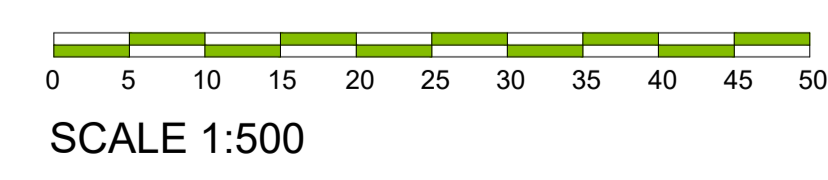
**Link**  
ENGINEERING

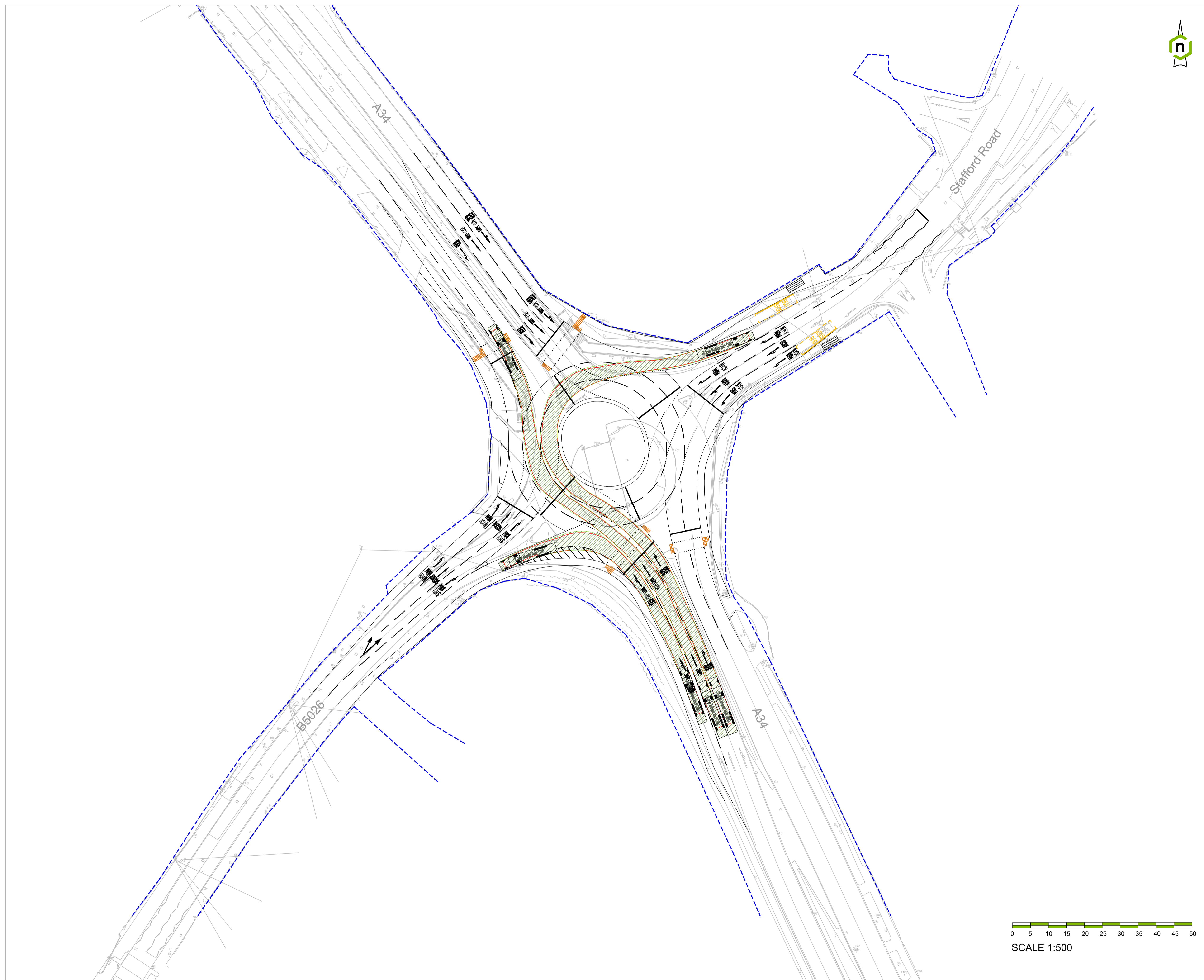
Project  
WALTON ROUNDABOUT, STONE

Drawing  
PROPOSED ROUNDABOUT  
SWEEP PATH ANALYSIS  
SHEET 3 OF 5

Scale @ A1 1:500    Drawn JPK    Checked RCG    Rev B

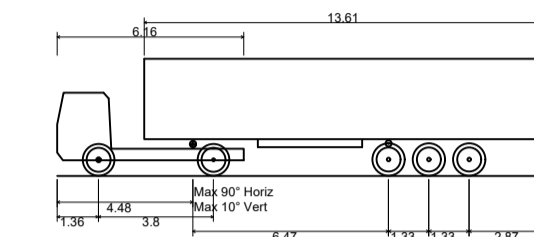
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DRAWING: PROPOSED ROUNDABOUT SWEEP PATH ANALYSIS  
SHEET 3 OF 5  
DATE: 27.07.22  
STATUS: INFORMATION (G2)





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Overall Length	2.550m
Overall Width	3.870m
Overall Body Height	0.515m
Min Body Ground Clearance	2.470m
Max Track Width	3.05m
Lock to lock time	6.600m
Kerb to Kerb Turning Radius	

B	UPDATED AS PER RSA COMMENTS	27.07.22	RCG
A	KERBING LAYOUT SHOWN	14.07.22	JSJ
-	INITIAL ISSUE	29.06.22	JKP
Rev.	Amendments	Date	By

Revisions

Client

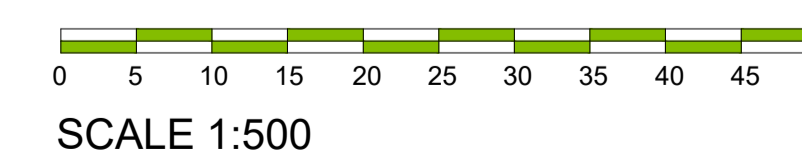
Project

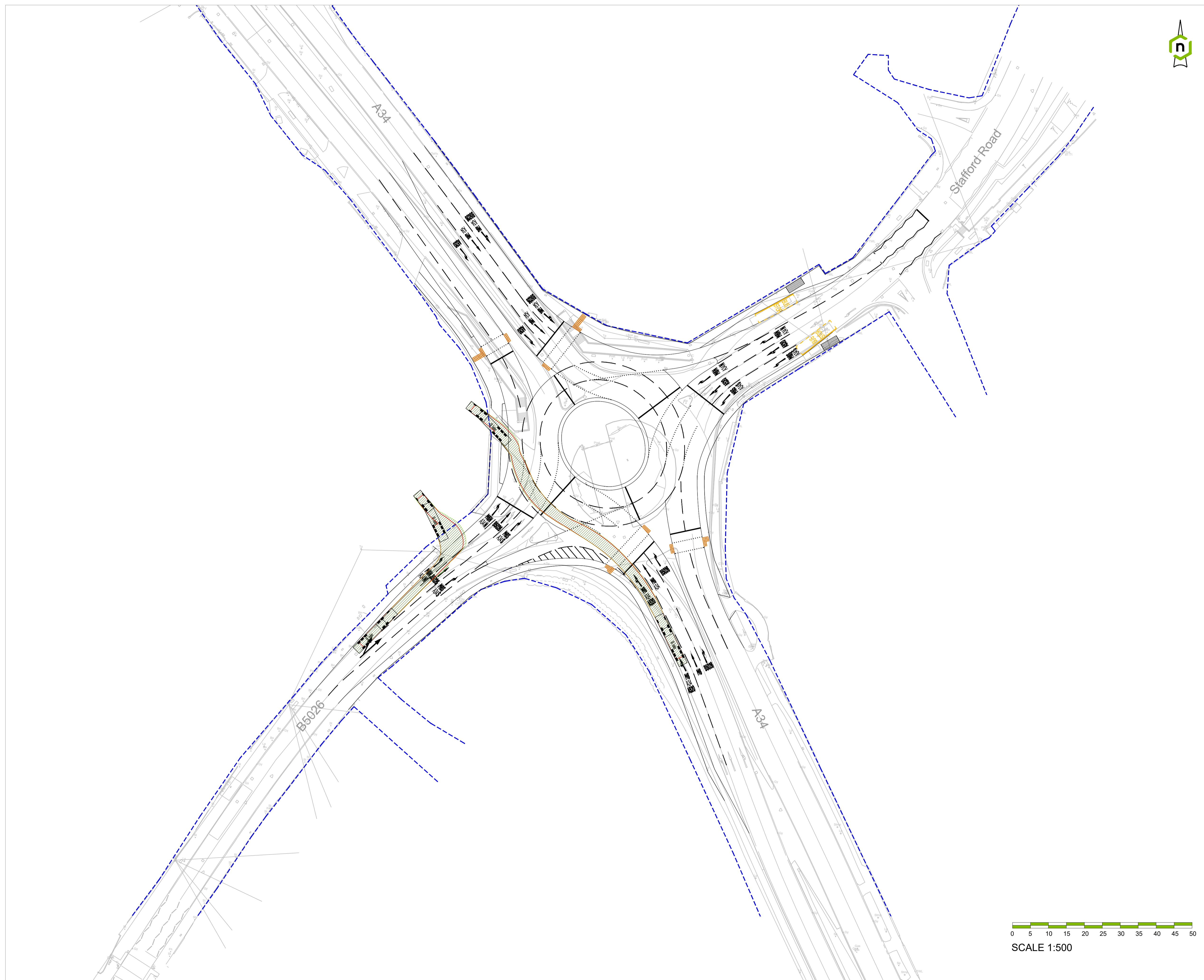
Project  
 WALTON ROUNDABOUT, STONE

Drawing  
 PROPOSED ROUNDABOUT  
 SWEEP PATH ANALYSIS  
 SHEET 4 OF 5

Scale @ A1	Drawn	Checked	Rev
1:500	JKP	RCG	B

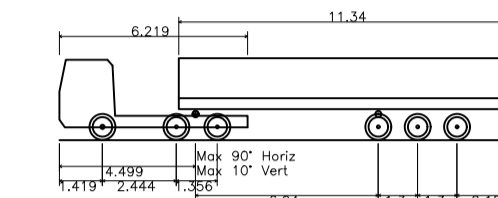
PROJECT INFORMATION (S2)



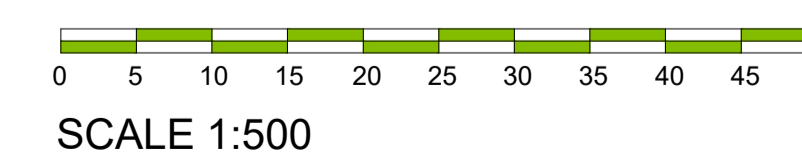


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Oil Tanker	15.28m
Overall Length	2.50m
Overall Width	2.70m
Overall Body Height	0.41m
Min Body Ground Clearance	2.45m
Track Width	4.05m
Lock to lock time	6.670m
Kerb to Kerb Turning Radius	



-	INITIAL ISSUE:	27.07.22	JPK
Rev.	Amendments	Date	By

Revisions

Client

**BLOOR HOMES**

**Link**  
ENGINEERING

Project

WALTON ROUNDABOUT, STONE

Drawing

PROPOSED ROUNDABOUT  
SWEPT PATH ANALYSIS  
SHEET 5 OF 5

Scale @ A1	Drawn	Checked	Rev
1:500	JPK	RCG	-

PROJECT: WASTE GEN-XX-DR-CE-114

STATUS: INFORMATION (S2)

# APPENDIX C

LinSig

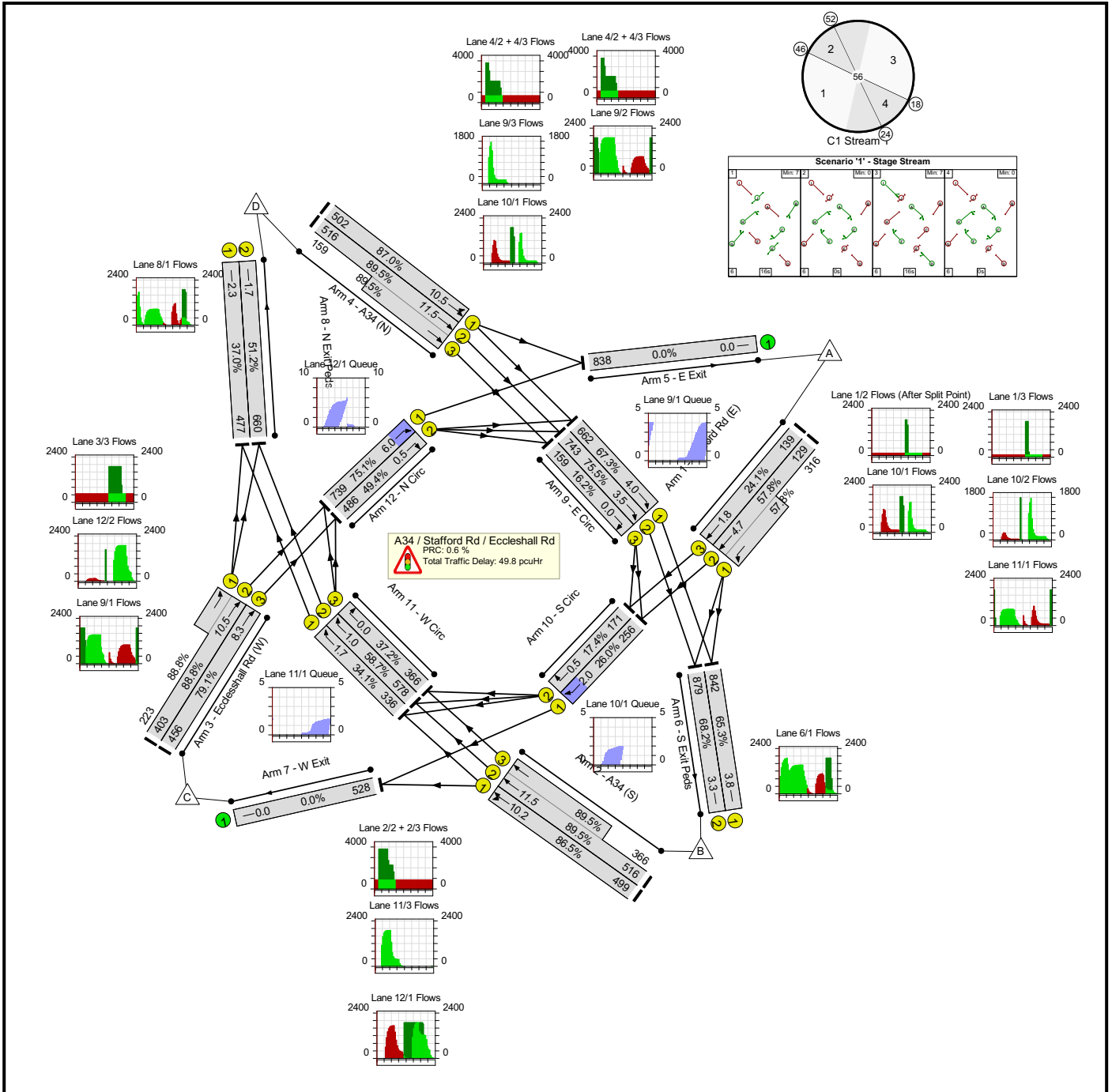
## Basic Results Summary

**Basic Results Summary****User and Project Details**

<b>Project:</b>	
<b>Title:</b>	<b>A34_Stafford Rd_Eccleshall Rd proposed</b>
<b>Location:</b>	
<b>Additional detail:</b>	
<b>File name:</b>	A34_Stafford Rd_Eccleshall Rd SigRab v3.lsg3x
<b>Author:</b>	
<b>Company:</b>	Mode
<b>Address:</b>	

Basic Results Summary

Scenario 1: '1' (FG1: '2031 AM B+C+D(300)', Plan 1: 'Network Control Plan 1')  
Network Layout Diagram





Basic Results Summary  
**Network Results**

## Basic Results Summary

Item	Lane Description	Lane Type	Full Phase	Arrow Phase	Num Greens	Total Green (s)	Arrow Green (s)	Demand Flow (pcu)	Sat Flow (pcu/Hr)	Capacity (pcu)	Deg Sat (%)	Turners In Gaps (pcu)	Turners When Unopposed (pcu)	Turners In Intergreen (pcu)	Total Delay (pcuHr)	Av. Delay Per PCU (s/pcu)	Mean Max Queue (pcu)
<b>Network: A34_Stafford Rd_Eccleshall Rd proposed</b>	-	-	-		-	-	-	-	-	-	89.5%	0	0	0	49.8	-	-
<b>A34 / Stafford Rd / Eccleshall Rd</b>	-	-	-		-	-	-	-	-	-	89.5%	0	0	0	49.8	-	-
1/2+1/1	Stafford Rd (E) Left Ahead	U	B		1	16	-	445	1900:1900	223+546	57.8 : 57.8%	-	-	-	2.6 (0.7+1.9)	21.3 (20.1:21.8)	4.7
1/3	Stafford Rd (E) Ahead	U	B		1	16	-	139	1900	577	24.1%	-	-	-	0.7	18.8	1.8
2/1	A34 (S) Left Ahead	U	D		1	16	-	499	1900	577	86.5%	-	-	-	5.5	39.9	10.2
2/2+2/3	A34 (S) Ahead	U	D		1	16	-	882	1900:1900	577+409	89.5 : 89.5%	-	-	-	8.3 (5.0+3.3)	34.0 (34.8:32.9)	11.5
3/2+3/1	Eccleshall Rd (W) Ahead Ahead2	U	G		1	16	-	626	1900:1900	454+251	88.8 : 88.8%	-	-	-	6.6 (4.3+2.3)	38.1 (38.5:37.4)	10.5
3/3	Eccleshall Rd (W) Ahead	U	G		1	16	-	456	1900	577	79.1%	-	-	-	4.1	32.3	8.3
4/1	A34 (N) Ahead Ahead2	U	I		1	16	-	502	1900	577	87.0%	-	-	-	5.7	40.7	10.5
4/2+4/3	A34 (N) Ahead	U	I		1	16	-	675	1900:1900	577+178	89.5 : 89.5%	-	-	-	7.2 (5.6+1.6)	38.4 (39.3:35.5)	11.5
6/1	S Exit Peds	U	M		1	37	-	842	1900	1289	65.3%	-	-	-	1.3	5.7	3.8
6/2	S Exit Peds	U	M		1	37	-	879	1900	1289	68.2%	-	-	-	1.4	5.6	3.3
8/1	N Exit Peds	U	K		1	37	-	477	1900	1289	37.0%	-	-	-	0.6	4.2	2.3
8/2	N Exit Peds	U	K		1	37	-	660	1900	1289	51.2%	-	-	-	0.7	3.8	1.7
9/1	E Circ Ahead	U	A		1	28	-	662	1900	984	67.3%	-	-	-	1.1	5.7	4.0
9/2	E Circ Ahead	U	A		1	28	-	743	1900	984	75.5%	-	-	-	0.9	4.3	3.5
9/3	E Circ Right	U	A		1	28	-	159	1900	984	16.2%	-	-	-	0.0	0.0	0.0

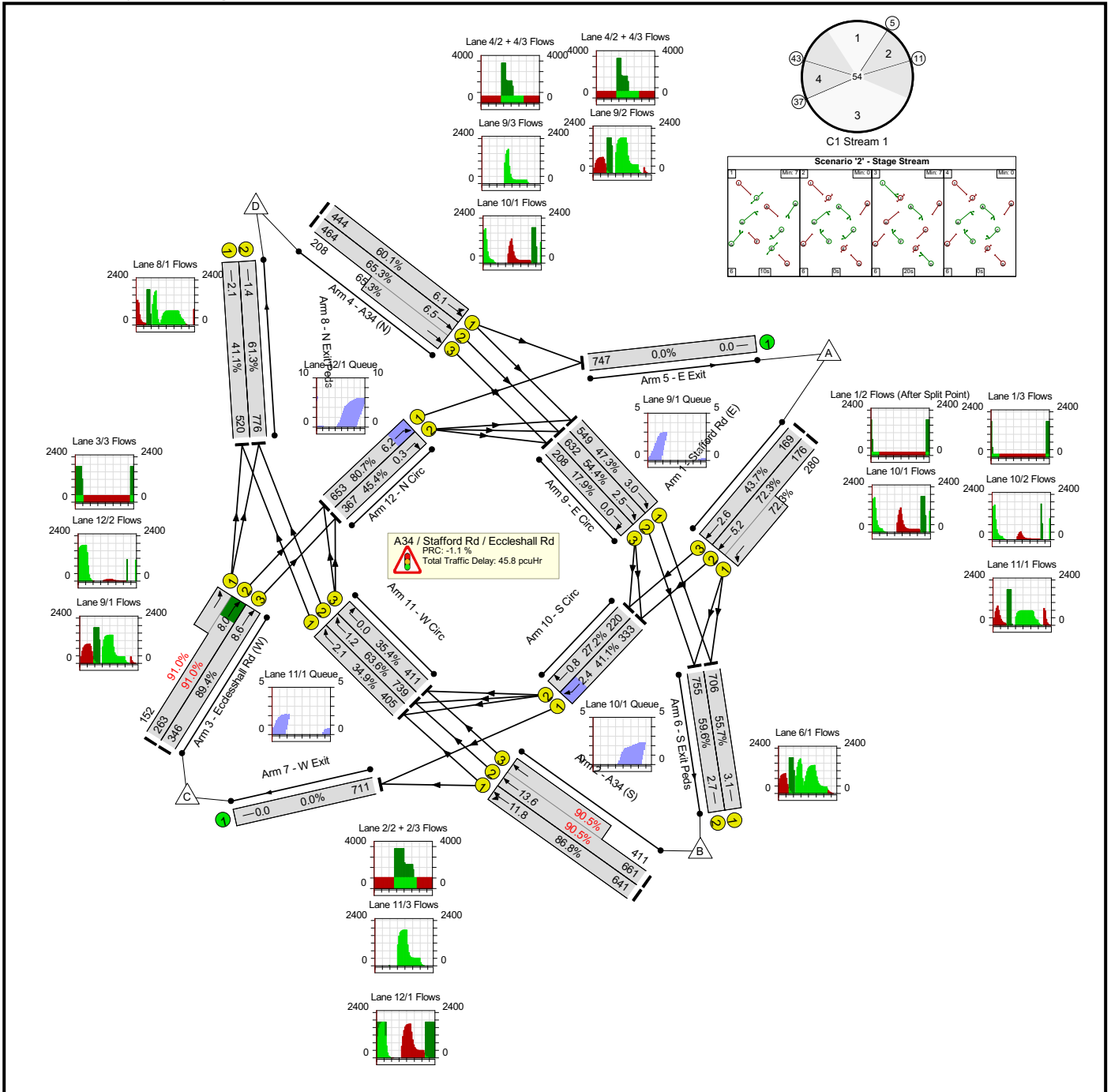
Basic Results Summary

10/1	S Circ Ahead	U	C		1	28	-	256	1900	984	26.0%	-	-	-	0.5	7.3	2.0
10/2	S Circ Right	U	C		1	28	-	171	1900	984	17.4%	-	-	-	0.1	2.5	0.5
11/1	W Circ Ahead	U	F		1	28	-	336	1900	984	34.1%	-	-	-	0.5	5.3	1.7
11/2	W Circ Ahead	U	F		1	28	-	578	1900	984	58.7%	-	-	-	0.3	1.8	1.0
11/3	W Circ Right	U	F		1	28	-	366	1900	984	37.2%	-	-	-	0.0	0.0	0.0
12/1	N Circ Ahead	U	H		1	28	-	739	1900	984	75.1%	-	-	-	1.6	7.6	6.0
12/2	N Circ Right	U	H		1	28	-	486	1900	984	49.4%	-	-	-	0.1	0.7	0.5
		C1	Stream: 1 PRC for Signalled Lanes (%):		0.6		Total Delay for Signalled Lanes (pcuHr):		45.84		Cycle Time (s):		56				
		C1	Stream: 2 PRC for Signalled Lanes (%):		32.0		Total Delay for Signalled Lanes (pcuHr):		2.70		Cycle Time (s):		56				
		C1	Stream: 3 PRC for Signalled Lanes (%):		75.8		Total Delay for Signalled Lanes (pcuHr):		1.25		Cycle Time (s):		56				
			PRC Over All Lanes (%):		0.6		Total Delay Over All Lanes(pcuHr):		49.79								

Basic Results Summary

Scenario 2: '2' (FG2: '2031 PM B+C+D(300)', Plan 1: 'Network Control Plan 1')

Network Layout Diagram



Basic Results Summary  
**Network Results**

## Basic Results Summary

Item	Lane Description	Lane Type	Full Phase	Arrow Phase	Num Greens	Total Green (s)	Arrow Green (s)	Demand Flow (pcu)	Sat Flow (pcu/Hr)	Capacity (pcu)	Deg Sat (%)	Turners In Gaps (pcu)	Turners When Unopposed (pcu)	Turners In Intergreen (pcu)	Total Delay (pcuHr)	Av. Delay Per PCU (s/pcu)	Mean Max Queue (pcu)
<b>Network: A34_Stafford Rd_Eccleshall Rd proposed</b>	-	-	-		-	-	-	-	-	-	91.0%	0	0	0	45.8	-	-
<b>A34 / Stafford Rd / Eccleshall Rd</b>	-	-	-		-	-	-	-	-	-	91.0%	0	0	0	45.8	-	-
1/2+1/1	Stafford Rd (E) Left Ahead	U	B		1	10	-	456	1900:1900	243+387	72.3 : 72.3%	-	-	-	3.8 (1.4+2.4)	29.8 (29.1:30.3)	5.2
1/3	Stafford Rd (E) Ahead	U	B		1	10	-	169	1900	387	43.7%	-	-	-	1.3	27.0	2.6
2/1	A34 (S) Left Ahead	U	D		1	20	-	641	1900	739	86.8%	-	-	-	5.8	32.5	11.8
2/2+2/3	A34 (S) Ahead	U	D		1	20	-	1072	1900:1900	730+454	90.5 : 90.5%	-	-	-	8.7 (5.6+3.2)	29.3 (30.3:27.7)	13.6
3/2+3/1	Eccleshall Rd (W) Ahead Ahead2	U	G		1	10	-	415	1900:1900	289+167	91.0 : 91.0%	-	-	-	6.6 (4.3+2.3)	57.1 (58.2:55.1)	8.0
3/3	Eccleshall Rd (W) Ahead	U	G		1	10	-	346	1900	387	89.4%	-	-	-	5.6	58.3	8.6
4/1	A34 (N) Ahead Ahead2	U	I		1	20	-	444	1900	739	60.1%	-	-	-	2.4	19.2	6.1
4/2+4/3	A34 (N) Ahead	U	I		1	20	-	672	1900:1900	711+319	65.3 : 65.3%	-	-	-	3.3 (2.4+0.9)	17.7 (18.4:16.3)	6.5
6/1	S Exit Peds	U	M		1	35	-	706	1900	1267	55.7%	-	-	-	1.0	5.0	3.1
6/2	S Exit Peds	U	M		1	35	-	755	1900	1267	59.6%	-	-	-	1.0	4.8	2.7
8/1	N Exit Peds	U	K		1	35	-	520	1900	1267	41.1%	-	-	-	0.7	4.5	2.1
8/2	N Exit Peds	U	K		1	35	-	776	1900	1267	61.3%	-	-	-	0.9	4.2	1.4
9/1	E Circ Ahead	U	A		1	32	-	549	1900	1161	47.3%	-	-	-	0.5	3.4	3.0
9/2	E Circ Ahead	U	A		1	32	-	632	1900	1161	54.4%	-	-	-	0.4	2.4	2.5
9/3	E Circ Right	U	A		1	32	-	208	1900	1161	17.9%	-	-	-	0.0	0.0	0.0

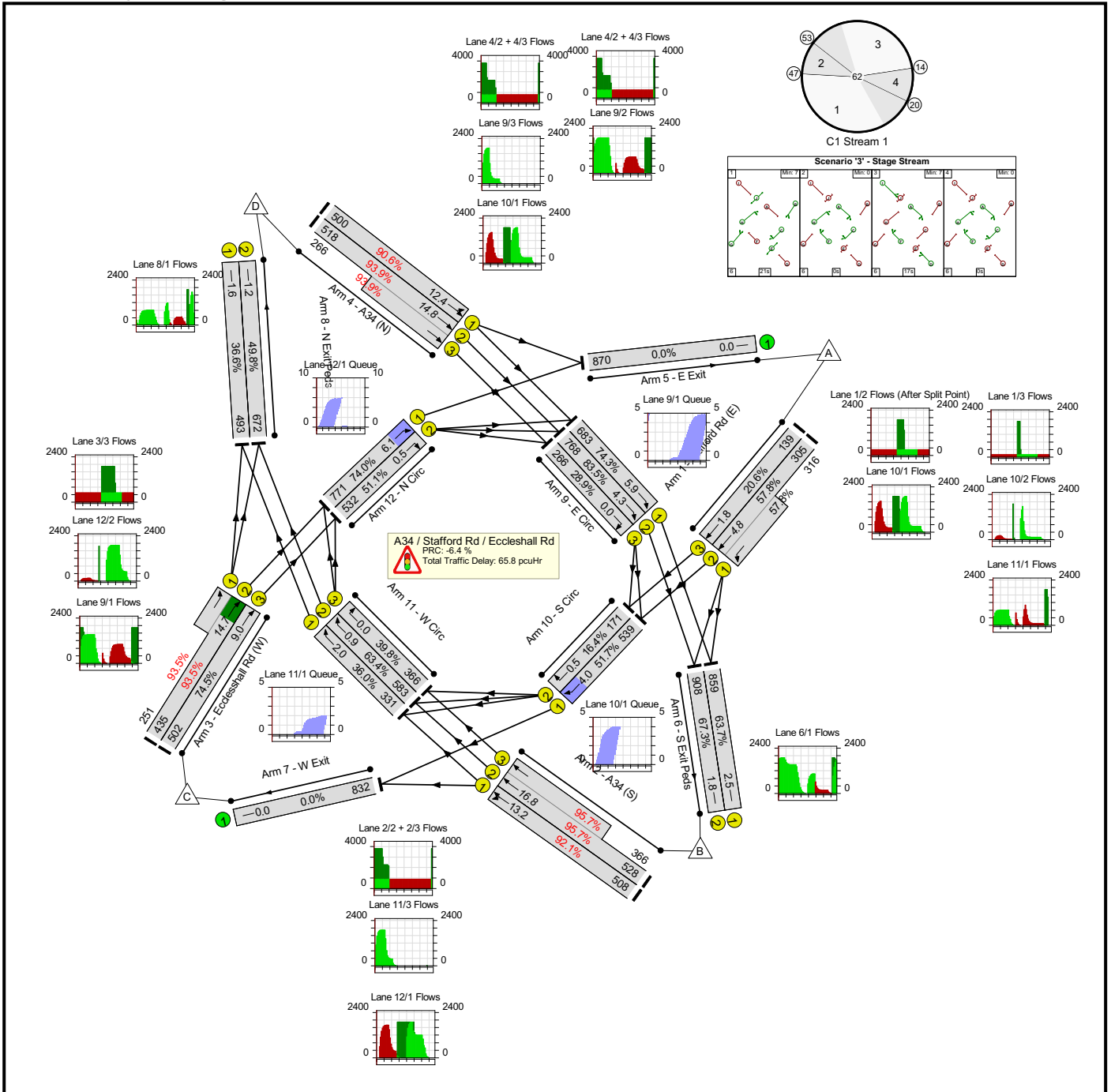
Basic Results Summary

10/1	S Circ Ahead	U	C		1	22	-	333	1900	809	41.1%	-	-	-	0.8	8.3	2.4
10/2	S Circ Right	U	C		1	22	-	220	1900	809	27.2%	-	-	-	0.2	3.7	0.8
11/1	W Circ Ahead	U	F		1	32	-	405	1900	1161	34.9%	-	-	-	0.5	4.5	2.1
11/2	W Circ Ahead	U	F		1	32	-	739	1900	1161	63.6%	-	-	-	0.2	1.1	1.2
11/3	W Circ Right	U	F		1	32	-	411	1900	1161	35.4%	-	-	-	0.0	0.0	0.0
12/1	N Circ Ahead	U	H		1	22	-	653	1900	809	80.7%	-	-	-	2.1	11.7	6.2
12/2	N Circ Right	U	H		1	22	-	367	1900	809	45.4%	-	-	-	0.1	0.8	0.3
		C1	Stream: 1 PRC for Signalled Lanes (%):				-1.1	Total Delay for Signalled Lanes (pcuHr):		42.29		Cycle Time (s):		54			
		C1	Stream: 2 PRC for Signalled Lanes (%):				51.0	Total Delay for Signalled Lanes (pcuHr):		1.99		Cycle Time (s):		54			
		C1	Stream: 3 PRC for Signalled Lanes (%):				46.9	Total Delay for Signalled Lanes (pcuHr):		1.56		Cycle Time (s):		54			
			PRC Over All Lanes (%):				-1.1	Total Delay Over All Lanes(pcuHr):		45.83							

Basic Results Summary

Scenario 3: '3' (FG3: '2031 AM B+C+D(570)', Plan 1: 'Network Control Plan 1')

Network Layout Diagram





Basic Results Summary  
**Network Results**

## Basic Results Summary

Item	Lane Description	Lane Type	Full Phase	Arrow Phase	Num Greens	Total Green (s)	Arrow Green (s)	Demand Flow (pcu)	Sat Flow (pcu/Hr)	Capacity (pcu)	Deg Sat (%)	Turners In Gaps (pcu)	Turners When Unopposed (pcu)	Turners In Intergreen (pcu)	Total Delay (pcuHr)	Av. Delay Per PCU (s/pcu)	Mean Max Queue (pcu)
<b>Network: A34_Stafford Rd_Eccleshall Rd proposed</b>	-	-	-		-	-	-	-	-	-	95.7%	0	0	0	65.8	-	-
<b>A34 / Stafford Rd / Eccleshall Rd</b>	-	-	-		-	-	-	-	-	-	95.7%	0	0	0	65.8	-	-
1/2+1/1	Stafford Rd (E) Left Ahead	U	B		1	21	-	621	1900:1900	528+547	57.8 : 57.8%	-	-	-	3.3 (1.6+1.7)	19.4 (19.3:19.4)	4.8
1/3	Stafford Rd (E) Ahead	U	B		1	21	-	139	1900	674	20.6%	-	-	-	0.7	17.3	1.8
2/1	A34 (S) Left Ahead	U	D		1	17	-	508	1900	552	92.1%	-	-	-	7.8	55.2	13.2
2/2+2/3	A34 (S) Ahead	U	D		1	17	-	894	1900:1900	552+382	95.7 : 95.7%	-	-	-	13.1 (7.9+5.2)	52.9 (53.8:51.5)	16.8
3/2+3/1	Eccleshall Rd (W) Ahead Ahead2	U	G		1	21	-	686	1900:1900	465+269	93.5 : 93.5%	-	-	-	9.3 (6.0+3.3)	48.8 (49.5:47.5)	14.7
3/3	Eccleshall Rd (W) Ahead	U	G		1	21	-	502	1900	674	74.5%	-	-	-	3.9	27.8	9.0
4/1	A34 (N) Ahead Ahead2	U	I		1	17	-	500	1900	552	90.6%	-	-	-	7.1	51.2	12.4
4/2+4/3	A34 (N) Ahead	U	I		1	17	-	784	1900:1900	552+283	93.9 : 93.9%	-	-	-	10.6 (7.2+3.4)	48.8 (49.9:46.6)	14.8
6/1	S Exit Peds	U	M		1	43	-	859	1900	1348	63.7%	-	-	-	1.1	4.5	2.5
6/2	S Exit Peds	U	M		1	43	-	908	1900	1348	67.3%	-	-	-	1.2	4.7	1.8
8/1	N Exit Peds	U	K		1	43	-	493	1900	1348	36.6%	-	-	-	0.5	3.7	1.6
8/2	N Exit Peds	U	K		1	43	-	672	1900	1348	49.8%	-	-	-	0.6	3.3	1.2
9/1	E Circ Ahead	U	A		1	29	-	683	1900	919	74.3%	-	-	-	1.5	7.7	5.9
9/2	E Circ Ahead	U	A		1	29	-	768	1900	919	83.5%	-	-	-	1.3	5.9	4.3
9/3	E Circ Right	U	A		1	29	-	266	1900	919	28.9%	-	-	-	0.0	0.0	0.0

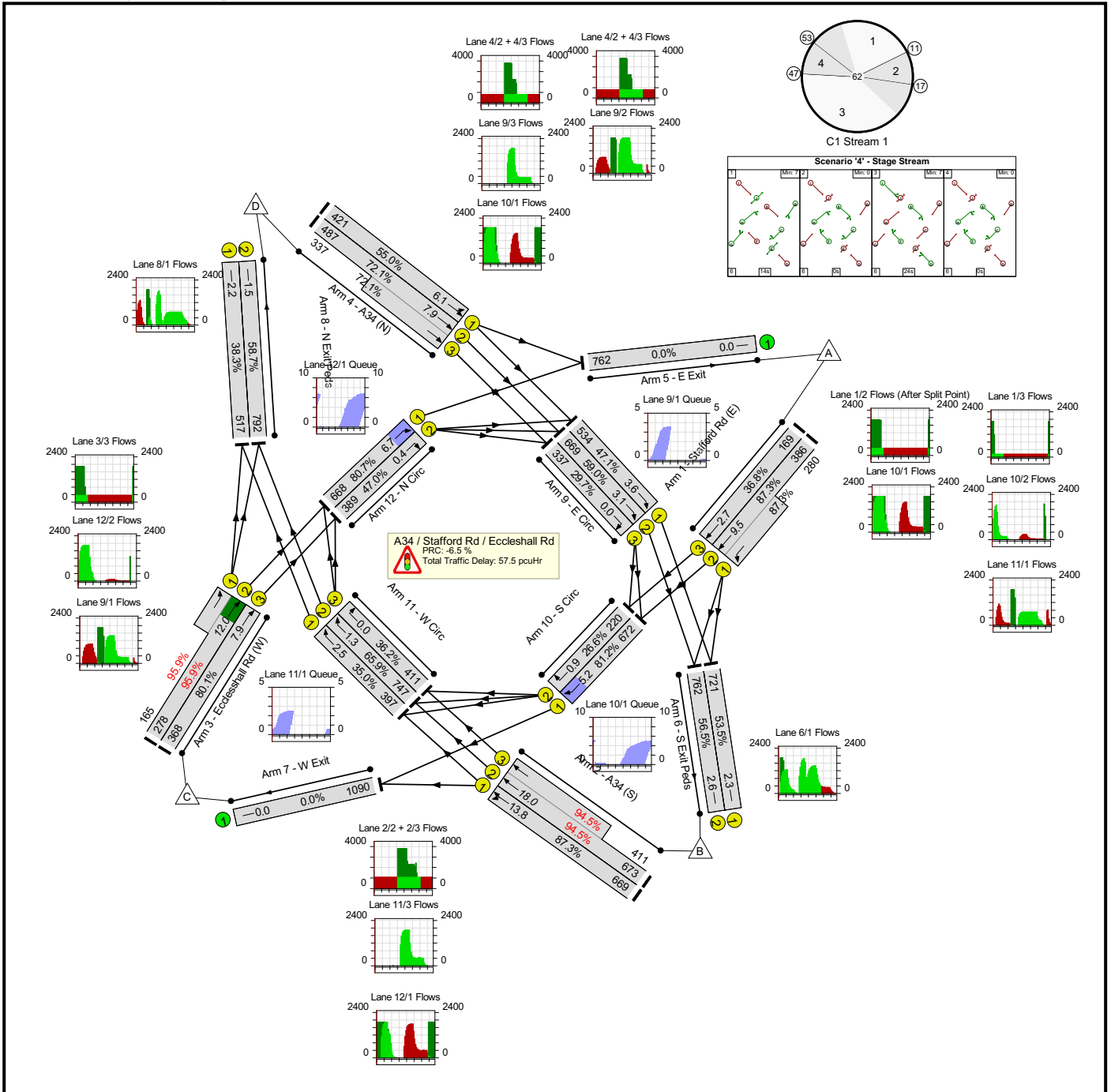
Basic Results Summary

10/1	S Circ Ahead	U	C		1	33	-	539	1900	1042	51.7%	-	-	-	1.1	7.1	4.0
10/2	S Circ Right	U	C		1	33	-	171	1900	1042	16.4%	-	-	-	0.1	2.4	0.5
11/1	W Circ Ahead	U	F		1	29	-	331	1900	919	36.0%	-	-	-	0.7	7.3	2.0
11/2	W Circ Ahead	U	F		1	29	-	583	1900	919	63.4%	-	-	-	0.3	2.0	0.9
11/3	W Circ Right	U	F		1	29	-	366	1900	919	39.8%	-	-	-	0.0	0.0	0.0
12/1	N Circ Ahead	U	H		1	33	-	771	1900	1042	74.0%	-	-	-	1.6	7.4	6.1
12/2	N Circ Right	U	H		1	33	-	532	1900	1042	51.1%	-	-	-	0.1	0.7	0.5
		C1	Stream: 1 PRC for Signalled Lanes (%):				-6.4	Total Delay for Signalled Lanes (pcuHr):		62.41		Cycle Time (s):		62			
		C1	Stream: 2 PRC for Signalled Lanes (%):				33.7	Total Delay for Signalled Lanes (pcuHr):		2.27		Cycle Time (s):		62			
		C1	Stream: 3 PRC for Signalled Lanes (%):				80.6	Total Delay for Signalled Lanes (pcuHr):		1.11		Cycle Time (s):		62			
			PRC Over All Lanes (%):				-6.4	Total Delay Over All Lanes(pcuHr):		65.80							

Basic Results Summary

Scenario 4: '4' (FG4: '2031 PM B+C+D(570)', Plan 1: 'Network Control Plan 1')

Network Layout Diagram



Basic Results Summary  
**Network Results**

## Basic Results Summary

Item	Lane Description	Lane Type	Full Phase	Arrow Phase	Num Greens	Total Green (s)	Arrow Green (s)	Demand Flow (pcu)	Sat Flow (pcu/Hr)	Capacity (pcu)	Deg Sat (%)	Turners In Gaps (pcu)	Turners When Unopposed (pcu)	Turners In Intergreen (pcu)	Total Delay (pcuHr)	Av. Delay Per PCU (s/pcu)	Mean Max Queue (pcu)
<b>Network: A34_Stafford Rd_Eccleshall Rd proposed</b>	-	-	-		-	-	-	-	-	-	95.9%	0	0	0	57.5	-	-
<b>A34 / Stafford Rd / Eccleshall Rd</b>	-	-	-		-	-	-	-	-	-	95.9%	0	0	0	57.5	-	-
1/2+1/1	Stafford Rd (E) Left Ahead	U	B		1	14	-	666	1900:1900	442+321	87.3 : 87.3%	-	-	-	7.3 (4.3+3.0)	39.2 (39.8:38.4)	9.5
1/3	Stafford Rd (E) Ahead	U	B		1	14	-	169	1900	460	36.8%	-	-	-	1.2	25.8	2.7
2/1	A34 (S) Left Ahead	U	D		1	24	-	669	1900	766	87.3%	-	-	-	6.4	34.4	13.8
2/2+2/3	A34 (S) Ahead	U	D		1	24	-	1084	1900:1900	712+435	94.5 : 94.5%	-	-	-	11.8 (7.5+4.3)	39.2 (40.3:37.3)	18.0
3/2+3/1	Eccleshall Rd (W) Ahead Ahead2	U	G		1	14	-	443	1900:1900	290+172	95.9 : 95.9%	-	-	-	9.6 (6.2+3.4)	78.2 (79.9:75.3)	12.0
3/3	Eccleshall Rd (W) Ahead	U	G		1	14	-	368	1900	460	80.1%	-	-	-	4.2	40.9	7.9
4/1	A34 (N) Ahead Ahead2	U	I		1	24	-	421	1900	766	55.0%	-	-	-	2.3	19.4	6.1
4/2+4/3	A34 (N) Ahead	U	I		1	24	-	824	1900:1900	676+468	72.1 : 72.1%	-	-	-	4.5 (2.8+1.8)	19.9 (20.4:19.0)	7.9
6/1	S Exit Peds	U	M		1	43	-	721	1900	1348	53.5%	-	-	-	0.8	4.0	2.3
6/2	S Exit Peds	U	M		1	43	-	762	1900	1348	56.5%	-	-	-	1.0	4.8	2.6
8/1	N Exit Peds	U	K		1	43	-	517	1900	1348	38.3%	-	-	-	0.6	4.0	2.2
8/2	N Exit Peds	U	K		1	43	-	792	1900	1348	58.7%	-	-	-	0.8	3.8	1.5
9/1	E Circ Ahead	U	A		1	36	-	534	1900	1134	47.1%	-	-	-	0.7	4.8	3.6
9/2	E Circ Ahead	U	A		1	36	-	669	1900	1134	59.0%	-	-	-	0.6	3.4	3.1
9/3	E Circ Right	U	A		1	36	-	337	1900	1134	29.7%	-	-	-	0.0	0.0	0.0

Basic Results Summary

10/1	S Circ Ahead	U	C		1	26	-	672	1900	827	81.2%	-	-	-	1.8	9.7	5.2
10/2	S Circ Right	U	C		1	26	-	220	1900	827	26.6%	-	-	-	0.3	4.2	0.9
11/1	W Circ Ahead	U	F		1	36	-	397	1900	1134	35.0%	-	-	-	0.7	5.9	2.5
11/2	W Circ Ahead	U	F		1	36	-	747	1900	1134	65.9%	-	-	-	0.3	1.5	1.3
11/3	W Circ Right	U	F		1	36	-	411	1900	1134	36.2%	-	-	-	0.0	0.0	0.0
12/1	N Circ Ahead	U	H		1	26	-	668	1900	827	80.7%	-	-	-	2.5	13.4	6.7
12/2	N Circ Right	U	H		1	26	-	389	1900	827	47.0%	-	-	-	0.1	0.9	0.4
		C1	Stream: 1 PRC for Signalled Lanes (%):				-6.5	Total Delay for Signalled Lanes (pcuHr):		54.24		Cycle Time (s):		62			
		C1	Stream: 2 PRC for Signalled Lanes (%):				59.3	Total Delay for Signalled Lanes (pcuHr):		1.82		Cycle Time (s):		62			
		C1	Stream: 3 PRC for Signalled Lanes (%):				53.2	Total Delay for Signalled Lanes (pcuHr):		1.40		Cycle Time (s):		62			
			PRC Over All Lanes (%):				-6.5	Total Delay Over All Lanes(pcuHr):		57.46							

# APPENDIX D

## Stage 1 RSA and Designer's Response





# Midlands Road Safety Ltd

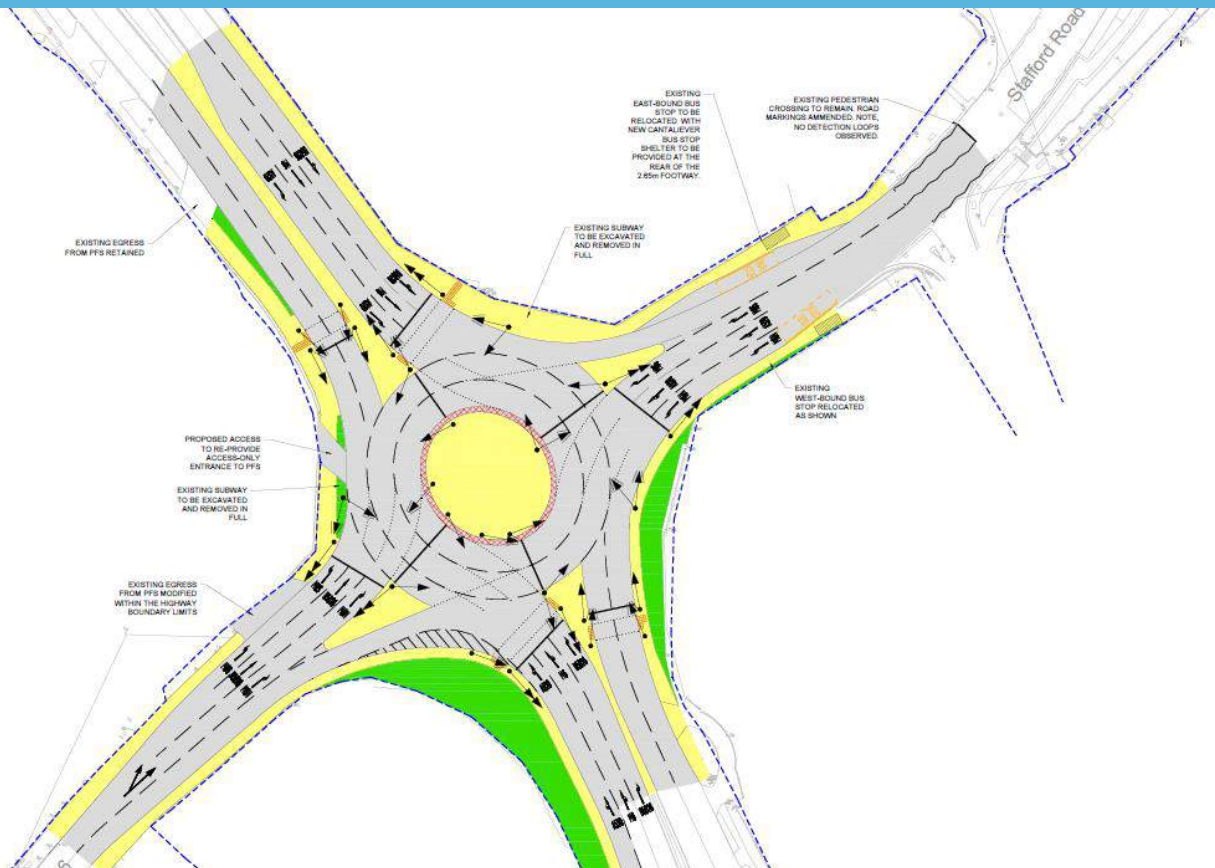
## PROPOSED ROUNDABOUT SIGNALISATION

### A34 STAFFORD ROUNDABOUT, STONE

### COMBINED STAGE 1 & 2 – ROAD SAFETY AUDIT

JULY 2022

REPORT REF: 22-1328-RSA12



# PROPOSED ROUNDABOUT SIGNALISATION

A34 STAFFORD ROUNDABOUT, STONE

## COMBINED STAGE 1 & 2 ROAD SAFETY AUDIT

JULY 2022

**REPORT REF:** 22-1328-RSA12

**CLIENT:** Link Engineering

**ENGINEER:** Midlands Road Safety Ltd

[REDACTED]

[REDACTED]

Revision	Date of Issue	Author	Checked
First Issue	19.07.2022	RC	PW

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3.	SAFETY PROBLEMS RAISED IN THIS ROAD SAFETY AUDIT	5
4.	ADDITIONAL CONSIDERATIONS	17
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## APPENDICES

- A. DRAWINGS AND DOCUMENTS REVIEWED
- B. SITE LOCATION AND PROBLEM IDENTIFICATION PLANS

## 1. INTRODUCTION

1.1 This report comprises a Combined Stage 1 & 2 Road Safety Audit (RSA) on the proposed signalisation of the Stafford Roundabout at the junction of the A34 The Fillybrooks and B5026 Stafford Road in Walton, Stone. The works include the full signalisation of the four-arm roundabout alongside localised widening on the westbound, eastbound and southbound approaches and across the circulatory carriageway. Full detailed design and Technical Approval will be required in due course with the Local Highway Authority. The works are arising from a proposed nearby residential development. The report was requested by Link Engineering on behalf of Bloor Homes. The Overseeing Organisation is Staffordshire County Council.

1.2 The Audit Team Membership was as follows:

Audit Team Leader

[REDACTED]

Audit Team Member

[REDACTED]

1.3 A site inspection was carried out by the Audit Team together on Wednesday 13th July 2022 between the hours of 20:00 and 21:30. During the site visit the weather conditions were sunny and the road surface was dry. Traffic flows were observed as being generally light, with light pedestrians and pedal cycle movements being observed.

1.4 The audit also comprised of a desk-top study where all documents and plans provided by the Design Team were reviewed. A list of these can be found in Appendix A.

1.5 The audit has been carried out in accordance with the principals of the National Highways document GG 119 'Road Safety Audit'. The Audit Team have examined and reported solely on the road safety implications of the scheme as presented and not examined or verified the compliance to any alternate criteria. The auditors have not been made aware of any specific departures from design standards although the Technical Note "Design Assumptions" states that "it is expected that a number of Departures from Standard to DMRB are to be encountered" within the roundabout design and that this "may result in modification to the proposed arrangement" in due course.

- 1.6 All comments and recommendations in this report are referenced to the Audit Brief where provided, and detailed drawings supplied. Where appropriate a list of “Additional Considerations” will follow from any safety problems raised. These are not identified safety problems but generalised comments to assist in the design and safety audit process.
- 1.7 Midlands Road Safety Ltd has ensured that this report has been carried out independently with no member of the Audit Team membership directly linked to the scheme design.

## 2. SAFETY PROBLEMS RAISED IN PREVIOUS ROAD SAFETY AUDITS

- 2.1. It is understood that no previous Road Safety Audits have been undertaken for the proposals subject to this report.

### 3. SAFETY PROBLEMS RAISED IN THIS ROAD SAFETY AUDIT

3.1. The Audit Team has identified twelve safety problems to be addressed.

#### 3.2. Problem 1

Location: General; Signalised Roundabout.

Summary: Full signalisation of small ICD roundabout may increase the risk of shunt, side swipe, lane change, red-light and see-through type collisions.

The ICD appears relatively small (circa 47m) for full signalisation of a 4-arm roundabout. This brings the following concerns:

1. There are short stacking spaces within the roundabout circulatory. Vehicles held at the circulating stop lines may obstruct the path of users attempting to leave the roundabout at the preceding exit. This could result in shunt type collisions.
2. The circulatory stop lines are located at the immediate edges of the traffic islands. Drivers of vehicles that straddle the stop lines may obstruct the flow of opposing traffic. This could increase the risk of sudden lane change, side swipe or shunt type collisions occurring on approach to or at the roundabout circulatory.
3. There are a large number of closely located primary and secondary traffic signals throughout the junction. There is a risk that drivers could inadvertently react to the wrong traffic signal due to see-through and the traffic signals being so closely located. This could increase the risk of red-light violations and associated collisions.
4. During time of increasingly heavy traffic flows (note the roundabout is used as an emergency diversion route for the M6) there is concern that the junction could become grid locked. This could increase driver frustration and increase the risk of red-light violations and shunt type collisions.

Recommendation:

It is recommended that suitable junction modelling is undertaken and tested to assess the suitability for the full signalisation of the junction. It may be prudent to provide partial signalisation or increase the ICD of the roundabout to facilitate full signalisation.

### 3.3. Problem 2

Location: General; Swept paths.

Summary: Swept paths of large vehicles may increase the risk of pedestrian collisions and damage to street furniture resulting in secondary collisions.

The swept paths of large vehicles travelling through the junction appear to overrun / sweep across the central circulatory kerb line, traffic islands and footways. There is concern that this may increase the risk of pedestrian collisions or secondary collisions should large vehicles collide with street furniture. Additionally, it is noted that the existing roundabout has a gated bypass which is used periodically for extra-long non-standard vehicles to transport industrial transformers through road closers and Police escort. There is concern that the modified roundabout may not be able to accommodate the movement of those vehicles.

Recommendation:

It is recommended that the geometry of the junction is adjusted to suitably allow the movements of likely vehicle types with suitable margins for error. Where possible footways should be set back from the edge of carriageway to reduce the risk of being struck by the overhang of large vehicles. It is also recommended that the need to cater for extra-large escorted vehicles is discussed with the maintaining agent.

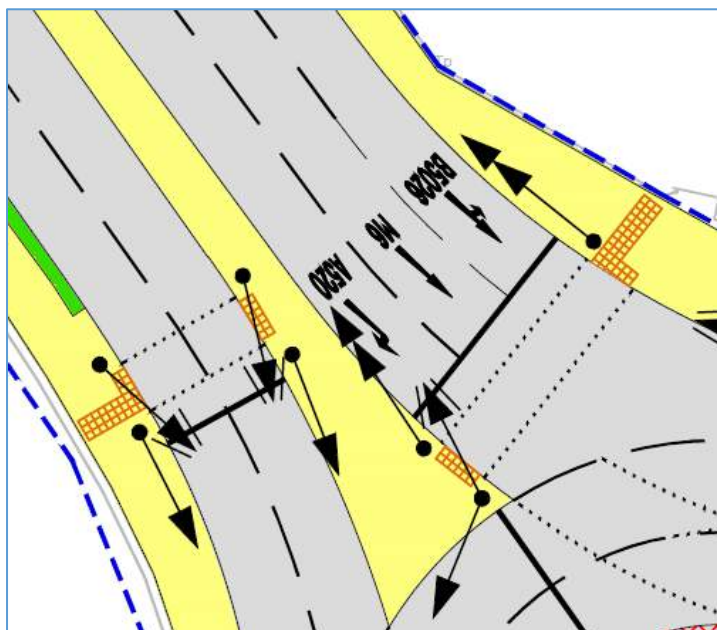


### 3.4. Problem 3

Location: General; pedestrian crossings.

Summary: Non-preferred' arrangement at the staggered pedestrian crossings may encourage a potentially unsafe desire line and increase the risk of pedestrian collisions occurring.

The 'non-preferred' arrangement at the staggered pedestrian crossings guides pedestrians to 'walk away' from approaching traffic on the second phase of the crossing and may also invite pedestrians to ignore the stagger and step around the proposed pedestrian guardrail and / or islands. Any pedestrian performing this manoeuvre may do so behind the stop-lines, and therefore potentially between stationary, accelerating or decelerating vehicles thus increasing the potential for pedestrian collisions to occur.



Recommendation:

It is recommended that the layout of the crossing is adjusted so pedestrians do not walk away from opposing traffic and that the crossing best serves likely pedestrian desire lines.

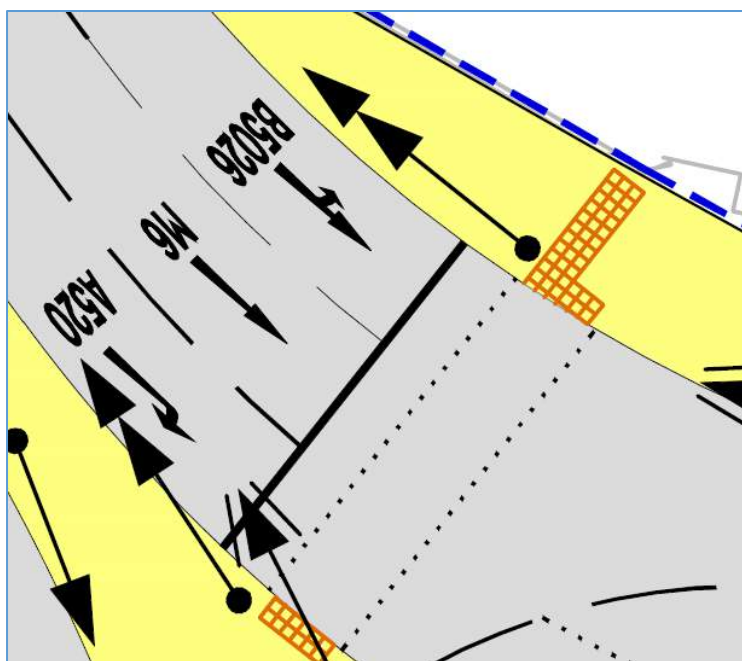
### 3.5. Problem 4

Location: General; pedestrian crossing stop lines.

Summary: Short gap between stop lines and crossing studs can increase the risk of pedestrian collisions at the crossings.

Relatively short gaps (2m) are provided between the vehicle stop lines and the crossing studs on the 3-lane approaches along the A34. This brings the following concerns:

1. 'Amber gamblers' could overrun the stop lines and collide with pedestrian users of the crossing.
2. Vehicles in adjacent lanes can reduce the inter-visibility between drivers at the stop lines and the crossing points. This can increase the risk of pedestrian collisions should a pedestrian attempt to cross late in the green man phase and / or out of stage.



Recommendation:

It is recommended that a suitable distance is provided between the stop lines and crossing studs to reduce the risk of adjacent stationary vehicles blocking inter-visibility to the crossing points.

### 3.6. Problem 5

Location: General; facilities for cyclists.

Summary: A lack of suitable cycle provision at the junction may increase the risk of cycle collisions.

Cyclists can be particularly vulnerable at roundabouts, with increased vulnerabilities coming through the scheme from an increase in the number of approach lanes and circulating carriageway lanes. During the site visit it was noted that the cyclists observed were using the shared footway on the north side of the west arm (despite current signage showing it terminates outside the convenience store) and continuing onto the eastern arms footway via the ramps to / from the existing subway. There is concern that the reduction in width of these footways together with the removal of the subway could lead to inexperienced cyclists being forced to negotiate the roundabout on carriageway. This could increase the risk of cycle collisions occurring around the junction.

Recommendation:

It is recommended that the existing off carriageway cycling facilities are continued through the junction. This may include provision such as providing suitable footway widths on the northern side along with providing a crossing on the northern arm of the A34 and upgrading the existing crossing on Stafford Road to allow westbound cyclists to access the shared facility.

### 3.7. Problem 6

Location: General; roundabout lane markings.

Summary: A lack of suitable lane guidance around the circulatory carriageway may increase the risk of lane change and side swipe type collisions.

Increased approach and circulatory lanes are proposed as part of the scheme. There is concern that the proposed fully concentric roundabout road markings do not provide adequate guidance for road users travelling through and around the circulatory of the junction, with some lane markings leading circulating vehicles into the central islands. This could lead to sudden unexpected lane changes and side swipe type collisions occurring within the roundabout circulatory and exits.



Recommendation:

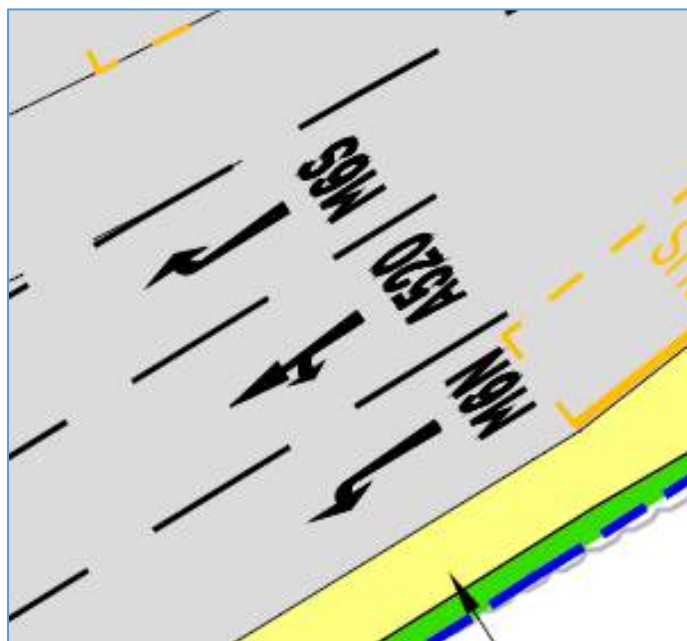
It is recommended that suitable road markings are provided to guide road users around the junction into the correct lane for their intended exits. This may include the use of spiral road markings.

### 3.8. Problem 7

Location: General; roundabout text and arrow destination road markings.

Summary: Unclear lane destination text and arrow road markings could increase the risk of driver confusion and late lane change or side swipe type collisions.

The lane destination text seems unclear throughout the junction, with there being no reference to the A34 instead the M6 being used. It is also noted that the western arm only has lane-1 as a turn left, where it appears that it can be also done from lane-2. There is also a concern with the road marking on the southern arm. The arrow markings show you can go ahead or right from lane-2 with lane-3 being right turn only. Therefore, the potential for two lanes turning right but there is only one lane on the exit (eastern arm). This could disorientate some drivers leading to sudden lane changes and side swipe type collisions.



Recommendation:

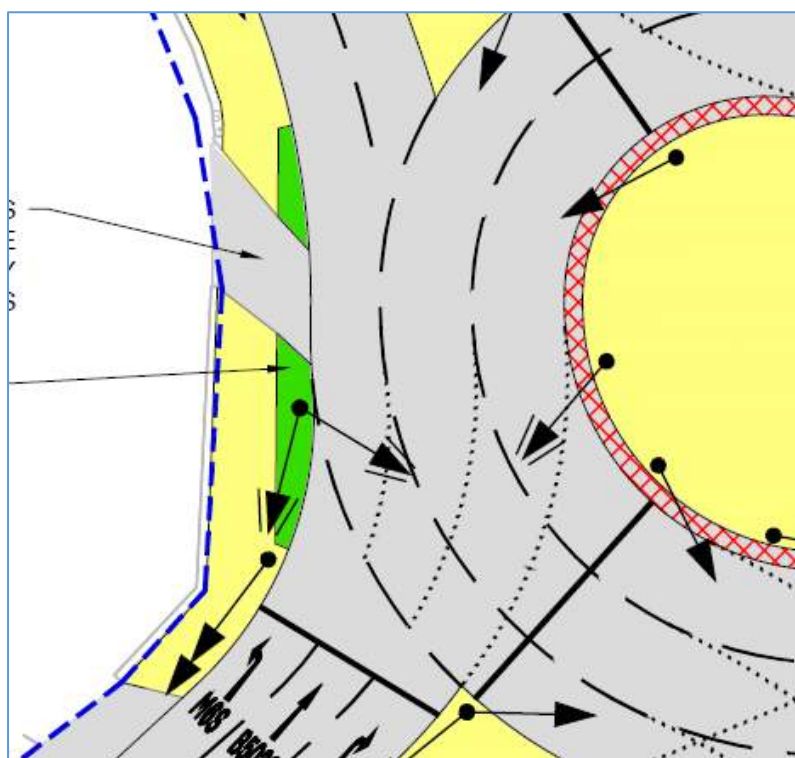
It is recommended that the road destination text markings are reviewed and that the A34 directions are suitably included.

### 3.9. Problem 8

Location: PFS Access; entry alignment.

Summary: The alignment of the PFS access may increase the risk of side swipe collisions within the circulatory or pedestrian collisions.

There is concern that the alignment of the PFS access from the internal roundabout circulatory may result in users who attempt to enter from lane-1 having to do so via utilising part of lane-2 or else cutting overrunning the verge and footway. This could lead to side swipe collisions within the circulatory or pedestrian collisions at the crossing point at the west side of the access.



Recommendation:

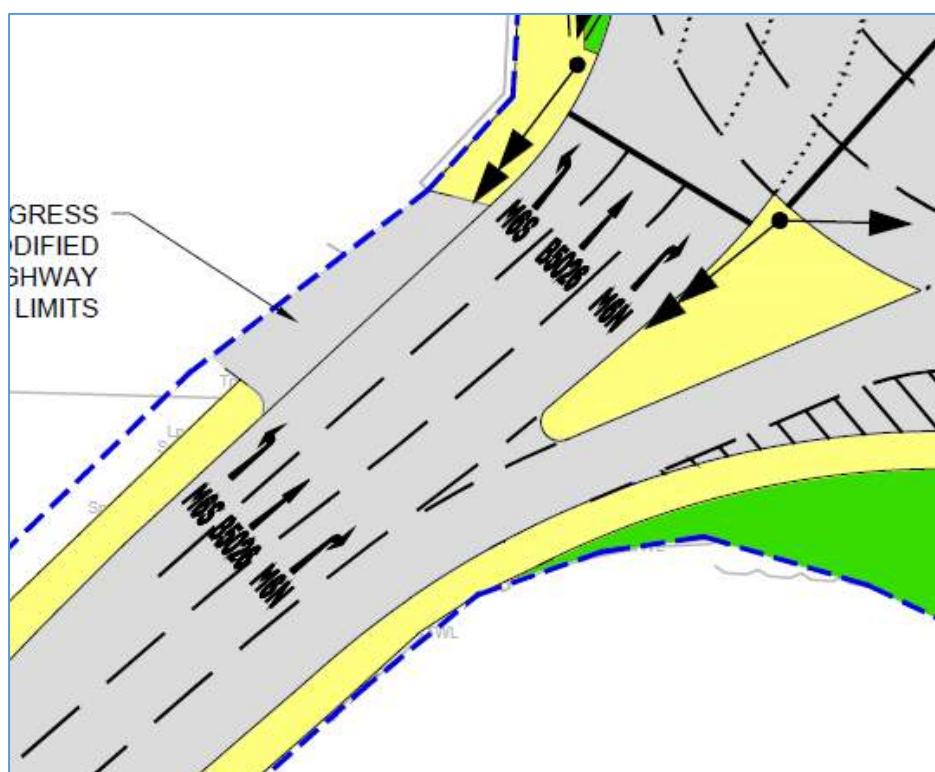
It is recommended that swept path analysis is undertaken for likely vehicle types and the geometry of the junction adjusted as necessary.

3.10. **Problem 8**

Location: PFS egress / Convenience access / egress onto Eccleshall Road;

Summary: Increased risk of failure to give way, right turn and shunt collisions.

The adjustments to the junction results in an extra eastbound approach lane to the roundabout. There is concern that vehicles may attempt to exit the PFS / Convenience store and turn right onto Eccleshall Road against up to 4 lanes of traffic. This could increase the risk of right turning failure to give way type collisions occurring. There is also concern that vehicles attempting to turn right into the accesses may unexpectedly block the westbound exit from the roundabout and increase the risk of shunt collisions occurring.



Recommendation:

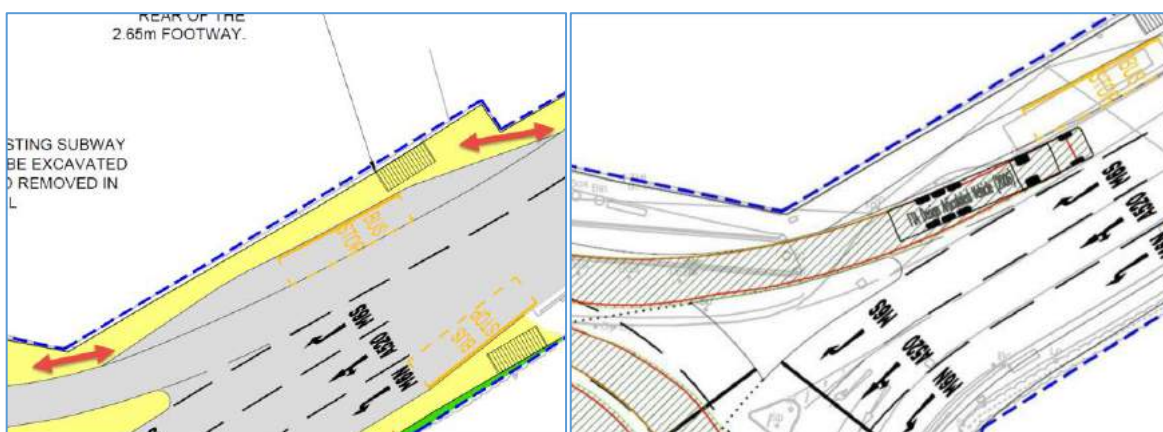
It is recommended that measures are taken to encourage vehicles to use the roundabout to U-turn instead of attempting to turn right and to prohibit right turns into the access. This may include extending the traffic island and providing road markings to keep the adjacent carriageway clear to aid u-turning manoeuvres.

## 3.11. Problem 9

Location: Stafford Road, either side of eastbound bus stop; footway width / alignment.

Summary: Reduced forward visibility and pinch points along footway may increase the risk of pedestrian collisions.

There are pinch-points created within the footway that coincide with existing sharp alignment changes at the rear of the footway that reduce forward visibility. There is concern that the pinch-points could increase the risk of collisions between opposing pedestrians, vehicles exiting private accesses and the swept paths of large vehicles.



Recommendation:

It is recommended that a consistent width footway is provided and that measures are introduced to maximise the available visibility between footway users and vehicles exiting the private accesses.

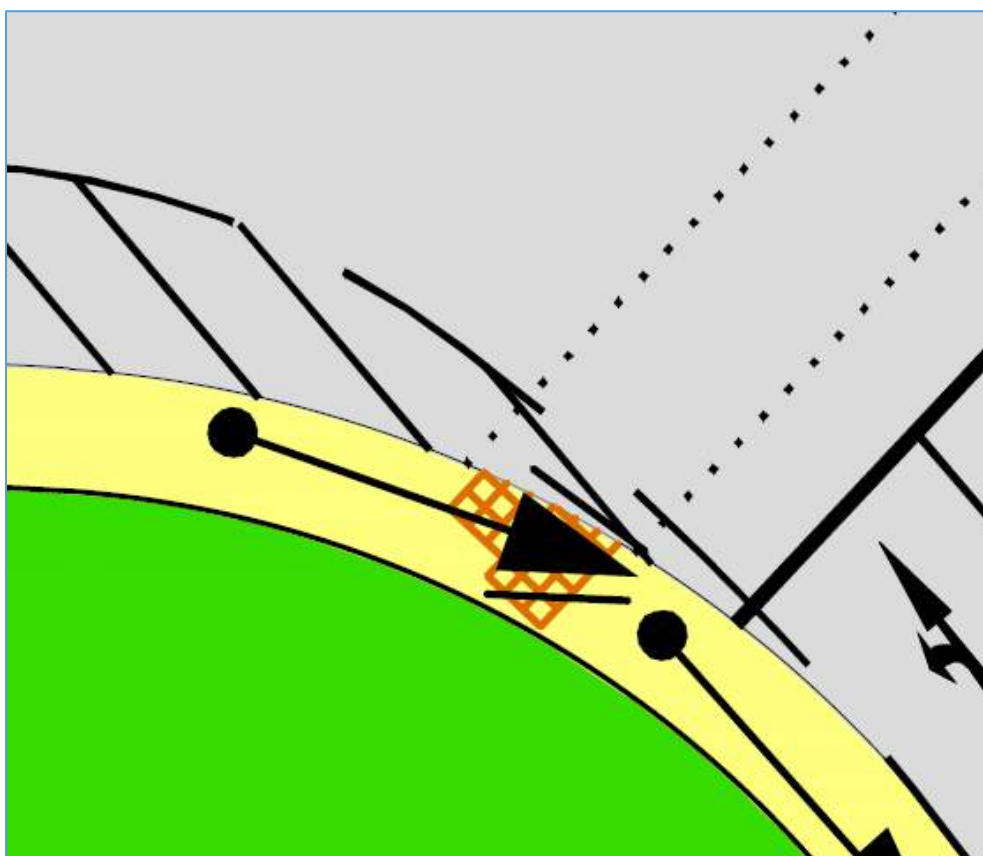


### 3.12. Problem 10

Location: Roundabout, south-western quadrant; proposed hatching.

Summary: Increased risk of pedestrian collisions.

Hatched road markings are proposed around the inside of the traffic lane around the south-western quadrant. These markings extend across the pedestrian crossing on the western side of the A34. There is concern that pedestrians may choose to wait within the hatched road markings, particularly should they choose to cross out of phase. This could increase the risk of those pedestrians being struck by larger passing vehicles.



Recommendation:

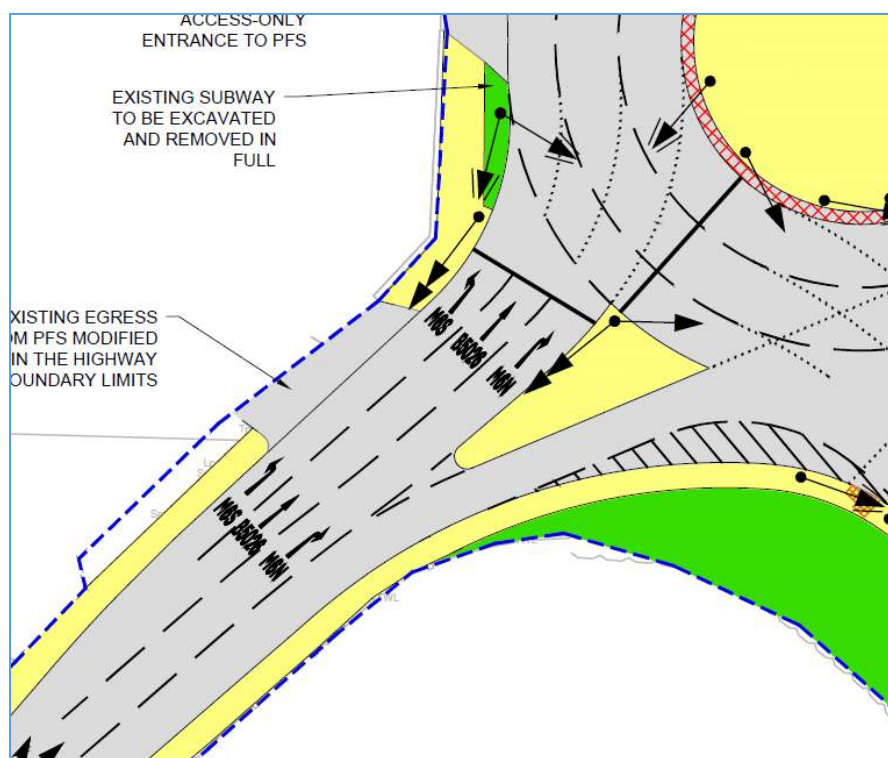
It is recommended that the crossing area is free from any hatching and if feasible that the kerb lines are adjusted to negate the need for hatching.

## 3.13. Problem 11

Location: Roundabout, western arm; pedestrian facilities.

Summary: Potential risk of pedestrian collisions.

It is noted that the scheme introduced new pedestrian crossings on the northern and southern arms. There is concern that a pedestrian desire line may be opened up across the western arm of the roundabout to / from the Convenience Store / chip shop and PFS. Whilst it is appreciated there is a crossing further west it is some 170m from the junction (the existing to the east is 85m from the junction). A lack of suitable pedestrian facilities may increase the risk of pedestrian collisions occurring.



Recommendation:

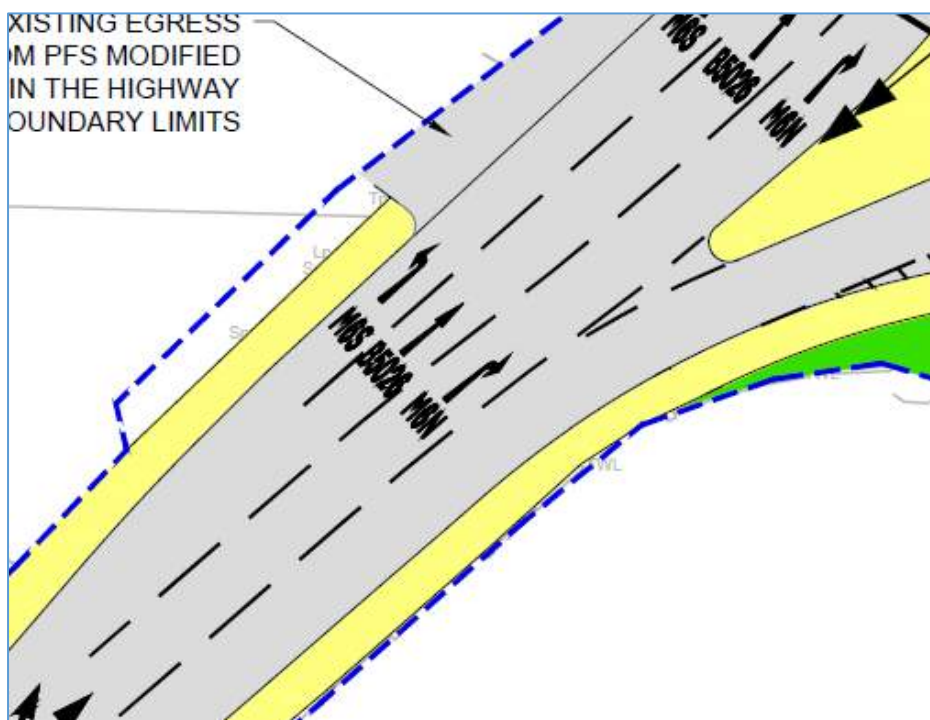
It is recommended that pedestrian desire lines are suitably assessed, and pedestrian facilities provided as necessary.

3.14. **Problem 12**

Location: Southern and western arm approaches; traffic lane widths.

Summary: Potential risk of side swipe collisions.

It is noted that the traffic lanes on the southern and western arm approaches to the roundabout are in some instances as narrow as 2.5m. There is concern that large vehicles may unexpectedly enter the adjacent traffic lanes in these areas which may increase the risk of side swipe type collisions occurring.



Recommendation:

It is recommended that suitable traffic lane widths are provided throughout the scheme.

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End of the 'Safety Problems' in this Section of the Report

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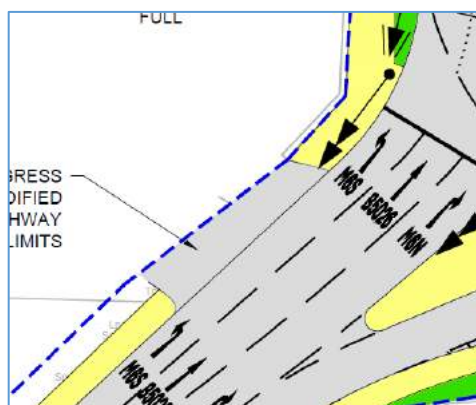
## 4. ADDITIONAL CONSIDERATIONS

### 4.1. Additional Consideration 1

The private vehicular and pedestrian accesses within the scheme extents are not shown on most drawings. It is recommended that these are included for clarity throughout the detailed design and suitably tracked for likely vehicle types and visibility splays shown to ensure the scheme does not negatively impact upon them.

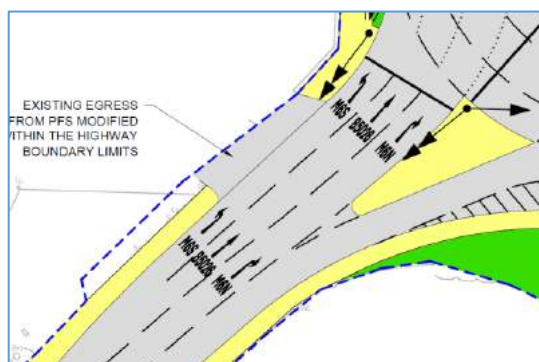
### 4.2. Additional Consideration 2

The existing joint PFS egress and convenience store / chip shop access / egress are located side by side creating a wide crossing for pedestrians. It is recommended that, subject to swept path analysis, the accesses are suitably separated to create two narrower crossings with a pedestrian refuge to improve inter-visibility and reduce the time pedestrians are in carriageway.



### 4.3. Additional Consideration 3

There appears to be a drafting error on the M6 road text destinations markings on the western and eastern arms with the M6S and M6N the wrong way around.



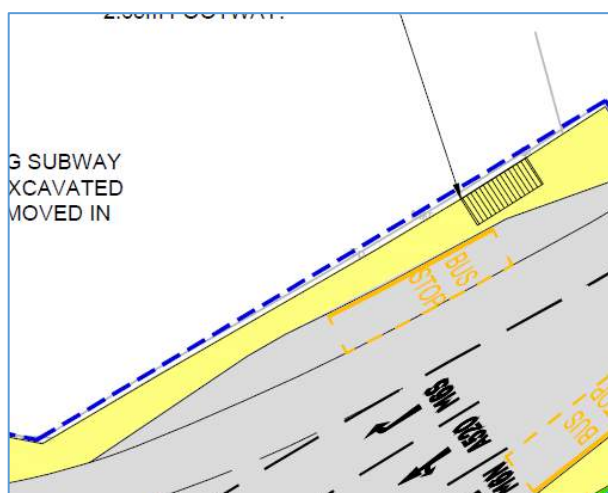
#### 4.4. Additional Consideration 4

There appears to be a level difference between the existing footway and the eastern side of the southbound crossing of the A34 on the southern arm. It is recommended that the levels are checked and adjusted as necessary to ensure that suitable gradients are provided to the crossing points.



#### 4.5. Additional Consideration 5

It is not clear if the parking is to be retained within the eastbound bus stop of Stafford Road for the adjacent shops. It is recommended that suitable parking restrictions and bays are provided as necessary to discourage any undesirable obstructive parking.



#### 4.6. Additional Consideration 6

It is not clear if dropped kerbs are to be provided at the two existing adjacent dropped kerb accesses to the east side of the eastbound bus stop within Stafford Road. It is recommended that the access provision is clarified and that suitable visibility splays (including to/from the footway) are provided or maintained.



## 5. AUDIT STATEMENT

5.1. We certify that the terms of reference of the audit are as described in GG 119 and that no member of the Audit Team was directly linked to the scheme design.

### 5.2. AUDIT TEAM LEADER:

[REDACTED]

Road Safety Consultant working on behalf of Midlands Road Safety Ltd

[REDACTED]

Date: 19.07.2022

### 5.3. AUDIT TEAM MEMBER:

[REDACTED]

Road Safety Consultant working on behalf of Midlands Road Safety Ltd

[REDACTED]

Date: 19.07.2022

## APPENDIX A

The following documents and drawings were provided for the purposes of this road safety audit.

### Drawings

Number	Title	Rev
WS-LE-GEN-XX-DR-CE-100-S2	General Arrangement	-
WS-LE-GEN-XX-DR-CE-101-S2	Geometry Arrangement	-
WS-LE-GEN-XX-DR-CE-140-S2	Vehicle Tracking	A
WS-LE-GEN-XX-DR-CE-141-S2	Vehicle Tracking	A
WS-LE-GEN-XX-DR-CE-142-S2	Vehicle Tracking	A
WS-LE-GEN-XX-DR-CE-143-S2	Vehicle Tracking	A
WS-LE-GEN-XX-DR-CE-200-S2	Site Clearance	-
WS-LE-GEN-XX-DR-CE-300-S2	Fencing	-
WS-LE-GEN-XX-DR-CE-700-S2	Construction Layout	-
WS-LE-GEN-XX-DR-CE-1100-S2	Kerbing Layout	-
WS-LE-GEN-XX-DR-CE-1300-S2	Street Lighting	-

### Documents

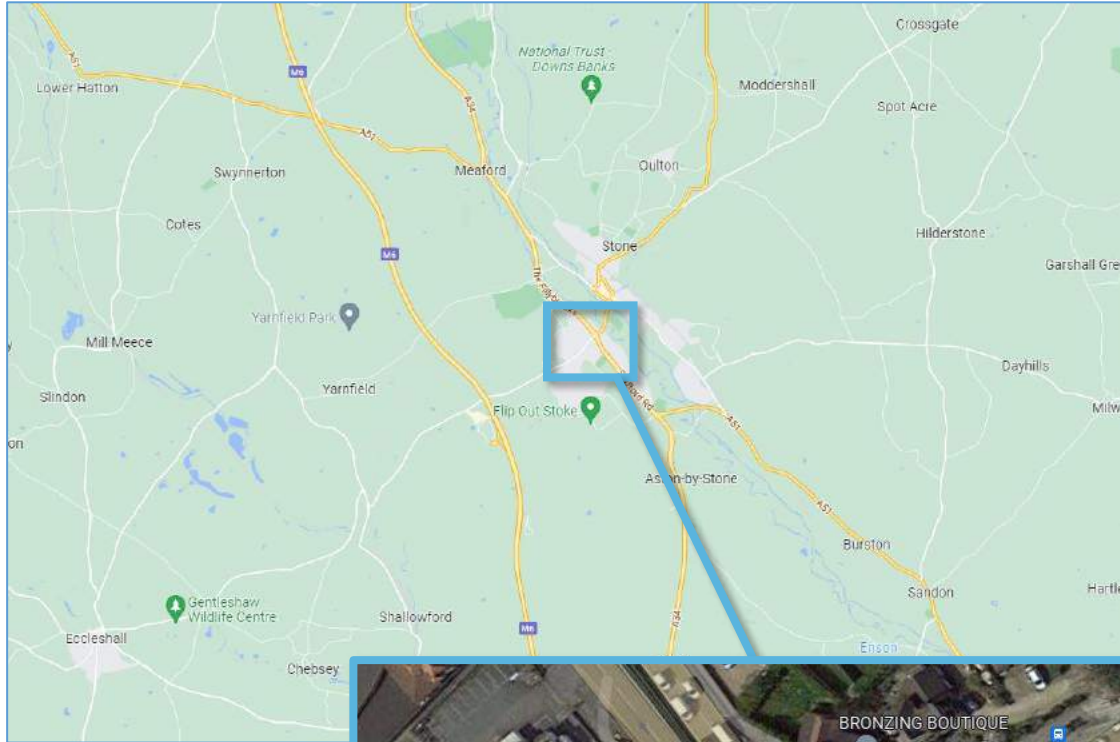
Author	Title	Rev	Date
Link Engineering	Road Safety Audit Brief (by email)	-	04.07.2022
Link Engineering	Technical Note: Design Assumptions	-	29.06.2022
Mode	Network Model Results	-	05.10.2021



## APPENDIX B

The location of any problems/observations that have been identified in Section 3 of this report can be seen on the extracts of the drawings supplied to the Audit Team, as listed in Appendix A.

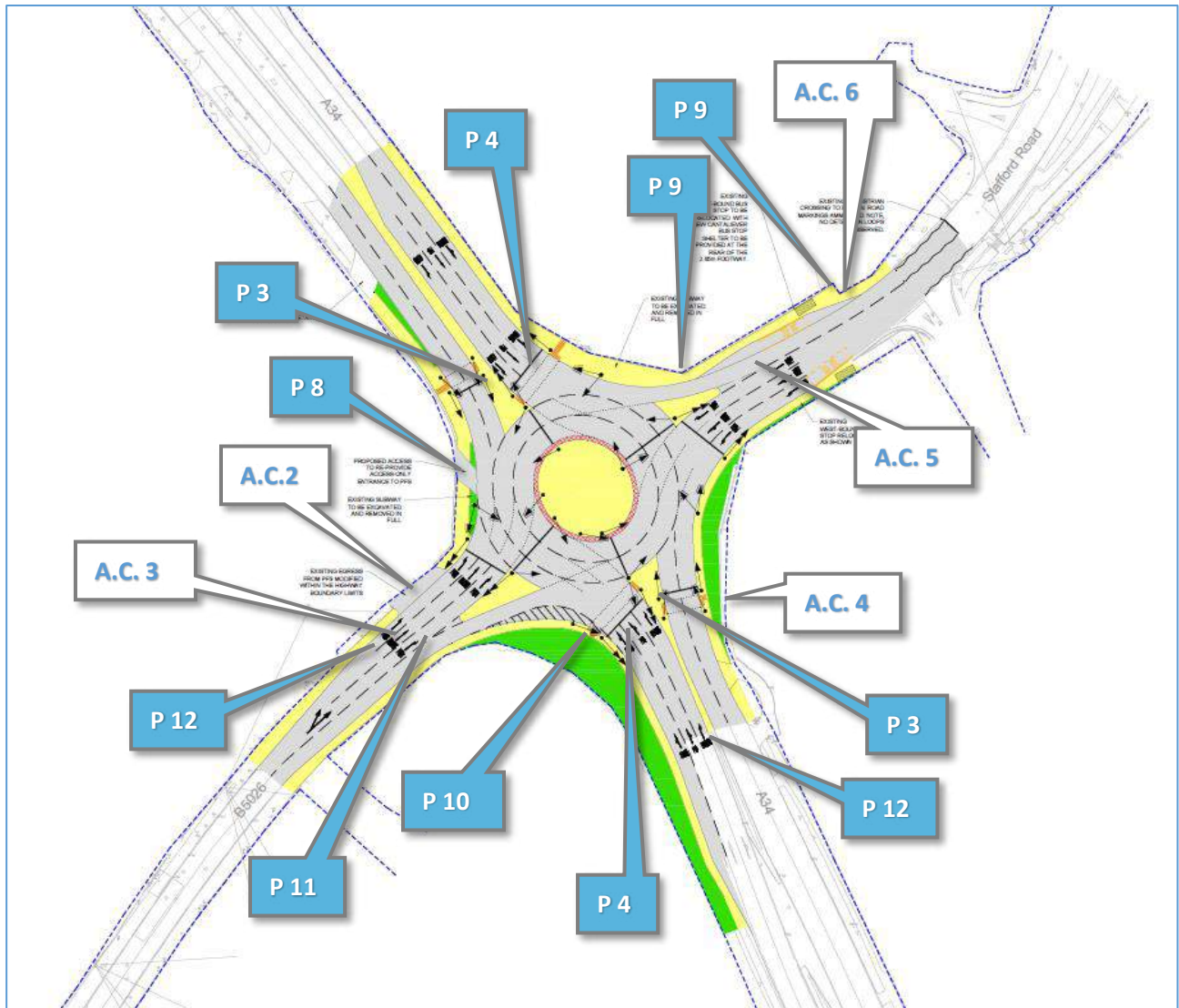
Figure 1 – Site Location



[Mapping source; Google Maps]



Figure 2 – Problem Location Plan





**Midlands Road Safety Ltd**



## TECHNICAL NOTE

Ref: SW-LE-HAD-XX-TN-CE-002



## WALTON RA, STONE - RSA Stage 1&amp;2 Response Report

Job Number: LE24539      Date: 02.08.2022      Client : Bloor Homes

Prepared By: [REDACTED]      Reviewed By: [REDACTED]

## Project Details

Project:	The proposed works comprise full signalisation of the four-arm roundabout alongside localised widening on the westbound, eastbound and southbound approaches and across the circulatory carriageway.
Report Title:	Stage 1&2 Road Safety Audit Response Report
Date of Report:	02.08.22
Document Ref &Revision:	SW-LE-HAD-XX-TN-CE-002
Prepared by:	Link Engineering

## Authorisation Sheet

Prepared by:	[REDACTED]
Position:	Undergraduate Civil Engineer
Signed:	-
Organisation:	Link Engineering
Date:	02.08.22

Approved by:	[REDACTED]
Position:	Director
Signed:	[REDACTED]
Organisation:	Link Engineering
Date:	-

## TECHNICAL NOTE

LE21539 – WALTON RA, STONE – RSA1&2



### 1 INTRODUCTION

- 1.1 This report comprises a Combined Stage 1 & 2 Road Safety Audit (RSA) on the proposed signalisation of the Stafford Roundabout at the junction of the A34 The Fillybrooks and B5026 Stafford Road in Walton, Stone (*RSA Report, Ref: 22-1328-RSA12 – Stafford Rbt Stone*). The works include the full signalisation of the four-arm roundabout alongside localised widening on the westbound, eastbound and southbound approaches and across the circulatory carriageway. Full detailed design and Technical Approval will be required in due course with the Local Highway Authority. The works are arising from a proposed nearby residential development. The report was requested by Link Engineering on behalf of Bloor Homes. The Overseeing Organisation is Staffordshire County Council.
- 1.2 The Audit Team Membership was as follows:
- Audit Team Leader** - [REDACTED]
- Audit Team Member** - [REDACTED]
- 1.3 A site inspection was carried out by the Audit Team together on Wednesday 13th July 2022 between the hours of 20:00 and 21:30. During the site visit the weather conditions were sunny and the road surface was dry. Traffic flows were observed as being generally light, with light pedestrians and pedal cycle movements being observed.
- 1.4 The audit also comprised of a desk-top study where all documents and plans provided by the Design Team were reviewed. A list of these can be found in Appendix A (*RSA Report, Ref: 22-1328-RSA12 – Stafford Rbt Stone*).
- 1.5 The audit has been carried out in accordance with the principals of the National Highways document GG 119 'Road Safety Audit'. The Audit Team have examined and reported solely on the road safety implications of the scheme as presented and not examined or verified the compliance to any alternate criteria. The auditors have not been made aware of any specific departures from design standards although the Technical Note "Design Assumptions" states that "it is expected that a number of Departures from Standard to DMRB are to be encountered" within the roundabout design and that this "may result in modification to the proposed arrangement" in due course.
- 1.6 All comments and recommendations in this report are referenced to the Audit Brief where provided, and detailed drawings supplied. Where appropriate a list of "Additional Considerations" will follow from any safety problems raised. These are not identified safety problems but generalised comments to assist in the design and safety audit process.
- 1.7 Midlands Road Safety Ltd has ensured that this report has been carried out independently with no member of the Audit Team membership directly linked to the scheme design.

### 2 SAFETY PROBLEMS RAISED IN PREVIOUS ROAD SAFETY AUDITS

- 2.1 It is understood that no previous Road Safety Audits have been undertaken for the proposals subject to this report.



TECHNICAL NOTE

LE21539 – WALTON RA, STONE – RSA1&2

3 ROAD SAFETY AUDIT DECISION LOG

RSA PROBLEM	RSA Recommendation	Design Organisation Response	Overseeing Organisation Response	Agreed RSA Action
<p>3.1 Problem 1</p> <p><b>Location:</b> General; Signalised Roundabout.</p> <p><b>Summary:</b> Full signalisation of small ICD roundabout may increase the risk of shunt, side swipe, lane change, red-light and see-through type collisions.</p> <ol style="list-style-type: none"> <li>1. There are short stacking spaces within the roundabout circulatory. Vehicles held at the circulating stop lines may obstruct the path of users attempting to leave the roundabout at the preceding exit. This could result in shunt type collisions.</li> <li>2. The circulatory stop lines are located at the immediate edges of the traffic islands. Drivers of vehicles that straddle the stop lines may obstruct the flow of opposing traffic. This could increase the risk of sudden lane change, side swipe or shunt type collisions occurring on approach to or at the roundabout circulatory.</li> <li>3. There are a large number of closely located primary and secondary traffic signals throughout the junction. There is a risk that drivers could inadvertently react to the wrong traffic signal due to see-through and the traffic signals being so closely</li> </ol>	<p>It is recommended that suitable junction modelling is undertaken and tested to assess the suitability for the full signalisation of the junction. It may be prudent to provide partial signalisation or increase the ICD of the roundabout to facilitate full signalisation.</p>	<p><b>Problem – Agree</b></p> <p><b>Recommendation – Agree</b></p> <p>The junction arrangement has been modelled using the industry standard software (Linsig) which replicates the proposed layout that was reviewed as part of the RSA. The model takes into account all aspects of the layout including the internal circulatory stacking spaces. The capacity assessment demonstrated that there was not an identified issue with this aspect for a future year assessment with the addition of the development generated traffic. Following this, it is also not considered necessary to change the ICD.</p> <p>On this basis it is considered suitable.</p>		



TECHNICAL NOTE

LE21539 – WALTON RA, STONE – RSA1&2

RSA PROBLEM	RSA Recommendation	Design Organisation Response	Overseeing Organisation Response	Agreed RSA Action
<p>located. This could increase the risk of red-light violations and associated collisions.</p> <p>4. During time of increasingly heavy traffic flows (note the roundabout is used as an emergency diversion route for the M6) there is concern that the junction could become grid locked. This could increase driver frustration and increase the risk of red-light violations and shunt type collisions.</p>		<p>A review of signal heads can be undertaken as part of a full signal audit (what we spoke about yesterday) and louvres can be installed to minimise issue</p>		
<p>3.2 Problem 2</p> <p><b>Location:</b> General; Swept paths.</p> <p><b>Summary:</b> Swept paths of large vehicles may increase the risk of pedestrian collisions and damage to street furniture resulting in secondary collisions.</p> <p>The swept paths of large vehicles travelling through the junction appear to overrun / sweep across the central circulatory kerb line, traffic islands and footways. There is concern that this may increase the risk of pedestrian collisions or secondary collisions should large vehicles collide with street furniture. Additionally, it is noted that the existing roundabout has a gated bypass which is used periodically for extra-long non-standard vehicles to transport industrial transformers through road closers and Police escort. There is concern that the modified roundabout may not be able to accommodate the movement of those vehicles.</p>	<p>It is recommended that the geometry of the junction is adjusted to suitably allow the movements of likely vehicle types with suitable margins for error. Where possible footways should be set back from the edge of carriageway to reduce the risk of being struck by the overhang of large vehicles. It is also recommended that the need to cater for extra-large escorted vehicles is discussed with the maintaining agent.</p>	<p><b>Problem – Agree</b></p> <p><b>Recommendation – Agree</b></p> <p>Tracking drawings updated following amendments to kerblines to support vehicle movements. Note there is an over-run within the circulatory.</p>		



TECHNICAL NOTE

LE21539 – WALTON RA, STONE – RSA1&2

RSA PROBLEM	RSA Recommendation	Design Organisation Response	Overseeing Organisation Response	Agreed RSA Action
<p>3.3 Problem 3</p> <p><b>Location:</b> General; pedestrian crossings.</p> <p><b>Summary:</b> Non-preferred' arrangement at the staggered pedestrian crossings may encourage a potentially unsafe desire line and increase the risk of pedestrian collisions occurring.</p> <p>The 'non-preferred' arrangement at the staggered pedestrian crossings guides pedestrians to 'walk away' from approaching traffic on the second phase of the crossing and may also invite pedestrians to ignore the stagger and step around the proposed pedestrian guardrail and / or islands. Any pedestrian performing this manoeuvre may do so behind the stop-lines, and therefore potentially between stationary, accelerating or decelerating vehicles thus increasing the potential for pedestrian collisions to occur.</p>	<p>It is recommended that the layout of the crossing is adjusted so pedestrians do not walk away from opposing traffic and that the crossing best serves likely pedestrian desire lines.</p>	<p><b>Problem – Agreed Recommendation – Disagree</b></p> <p>Pedestrian crossing is under signal control which will require pedestrians to stop and wait for green man before crossing.</p> <p>The suggested arrangement by the auditor, given that this crossing is integral to the junction signalisation would result in an elongated intergreen as the stop line would be further set back. This is not feasible within the traffic model.</p> <p>The proposed modification to the existing pedestrian provisions around this junction seeks to omit the existing pedestrian underpass to provide an at grade crossing (for all user groups) which is considered a significant betterment whilst seeking to</p>		





TECHNICAL NOTE

LE21539 – WALTON RA, STONE – RSA1&2

RSA PROBLEM	RSA Recommendation	Design Organisation Response	Overseeing Organisation Response	Agreed RSA Action
		maintain the current desire lines. It is also worth noting that the current ramp access to the underpass which some user groups would have to use, extends back to the point at which the proposed pedestrian crossing is located. Therefore it is considered that there is not a discernible difference in the distances between existing and proposed layouts.		
<p>3.4 Problem 4</p> <p><b>Location:</b> General; pedestrian crossing stop lines.</p> <p><b>Summary:</b> Short gap between stop lines and crossing studs can increase the risk of pedestrian collisions at the crossings.</p> <p>Relatively short gaps (2m) are provided between the vehicle stop lines and the crossing studs on the 3-lane approaches along the A34. This brings the following concerns:</p> <ol style="list-style-type: none"> <li>1. 'Amber gamblers' could overrun the stop lines and collide with pedestrian users of the crossing.</li> </ol>	<p>It is recommended that a suitable distance is provided between the stop lines and crossing studs to reduce the risk of adjacent stationary vehicles blocking inter-visibility to the crossing points.</p>	<p><b>Problem – Agreed</b></p> <p><b>Recommendation – Agreed</b></p> <p>Stop lines amended to 2.5m offset. Note, all works subject to further detailed design.</p>		



TECHNICAL NOTE

LE21539 – WALTON RA, STONE – RSA1&2

RSA PROBLEM	RSA Recommendation	Design Organisation Response	Overseeing Organisation Response	Agreed RSA Action
<p>2. Vehicles in adjacent lanes can reduce the inter-visibility between drivers at the stop lines and the crossing points. This can increase the risk of pedestrian collisions should a pedestrian attempt to cross late in the green man phase and / or out of stage.</p>				
<p>3.5 Problem 5</p> <p><b>Location:</b> General; facilities for cyclists.</p> <p><b>Summary:</b> A lack of suitable cycle provision at the junction may increase the risk of cycle collisions.</p> <p>Cyclists can be particularly vulnerable at roundabouts, with increased vulnerabilities coming through the scheme from an increase in the number of approach lanes and circulating carriageway lanes. During the site visit it was noted that the cyclists observed were using the shared footway on the north side of the west arm (despite current signage showing it terminates outside the convenience store) and continuing onto the eastern arms footway via the ramps to / from the existing subway. There is concern that the reduction in width of these footways together with the removal of the subway could lead to inexperienced cyclists being forced to negotiate the roundabout on carriageway. This could</p>	<p>It is recommended that the existing off carriageway cycling facilities are continued through the junction. This may include provision such as providing suitable footway widths on the northern side along with providing a crossing on the northern arm of the A34 and upgrading the existing crossing on Stafford Road to allow westbound cyclists to access the shared facility.</p>	<p><b>Problem – Agreed Recommendation – Disagree</b></p> <p>Existing cycleway provision is due to be retained as currently available. Cyclists are promoted to dismount to the west of the RA which is what is proposed to remain.</p> <p>Refer to WS-LE-GEN-XX-DR-CE-1200, which shows sign to remain.</p> <p>The proposed modification to the existing pedestrian provisions around this junction seeks to omit the existing pedestrian underpass to provide an at grade crossing (for all user groups) which is considered a significant betterment whilst seeking to</p>		



TECHNICAL NOTE

LE21539 – WALTON RA, STONE – RSA1&2

RSA PROBLEM	RSA Recommendation	Design Organisation Response	Overseeing Organisation Response	Agreed RSA Action
<p>increase the risk of cycle collisions occurring around the junction.</p>		<p>maintain the current desire lines.</p> <p>The key desire line for cycle movements will be along the east west axis. The scheme provides significant betterment to the current facilities and arrangements.</p>		
<p>3.6 Problem 6</p> <p><b>Location:</b> General; roundabout lane markings.</p> <p><b>Summary:</b> A lack of suitable lane guidance around the circulatory carriageway may increase the risk of lane change and side swipe type collisions.</p> <p>Increased approach and circulatory lanes are proposed as part of the scheme. There is concern that the proposed fully concentric roundabout road markings do not provide adequate guidance for road users travelling through and around the circulatory of the junction, with some lane markings leading circulating vehicles into the central islands. This could lead to sudden unexpected lane changes and side swipe type collisions occurring within the roundabout circulatory and exits.</p>	<p>It is recommended that suitable road markings are provided to guide road users around the junction into the correct lane for their intended exits. This may include the use of spiral road markings.</p>	<p><b>Problem – Agreed</b></p> <p><b>Recommendation – Agreed</b></p> <p>Tracking to be updated. Additional road markings to define lane destinations have been added. This support the existing ADS strategy to remain (with signs relocated). Spiral Markings to be considered at detailed design.</p>		

## TECHNICAL NOTE

LE21539 – WALTON RA, STONE – RSA1&2

RSA PROBLEM	RSA Recommendation	Design Organisation Response	Overseeing Organisation Response	Agreed RSA Action
<p>3.7 Problem 7</p> <p><b>Location:</b> General; roundabout text and arrow destination road markings.</p> <p><b>Summary:</b> Unclear lane destination text and arrow road markings could increase the risk of driver confusion and late lane change or side swipe type collisions</p> <p>The lane destination text seems unclear throughout the junction, with there being no reference to the A34 instead the M6 being used. It is also noted that the western arm only has lane-1 as a turn left, where it appears that it can be also done from lane-2. There is also a concern with the road marking on the southern arm. The arrow markings show you can go ahead or right from lane-2 with lane-3 being right turn only. Therefore, the potential for two lanes turning right but there is only one lane on the exit (eastern arm). This could disorientate some drivers leading to sudden lane changes and side swipe type collisions.</p>	<p>It is recommended that the road destination text markings are reviewed and that the A34 directions are suitably included.</p>	<p><b>Problem – Agreed</b></p> <p><b>Recommendation – Agreed</b></p> <p>A34 to be added.</p>		
<p>3.8 Problem 8 (1)</p> <p><b>Location:</b> PFS Access; entry alignment.</p> <p><b>Summary:</b> The alignment of the PFS access may increase the risk of side swipe collisions within the circulatory or pedestrian collisions.</p>	<p>It is recommended that swept path analysis is undertaken for likely vehicle types and the geometry of the junction adjusted as necessary.</p>	<p><b>Problem – Agree</b></p> <p><b>Recommendation – Agree</b></p> <p>PFS tracking added to show access via the A34 and Stafford Road.</p>		



TECHNICAL NOTE

LE21539 – WALTON RA, STONE – RSA1&2

RSA PROBLEM	RSA Recommendation	Design Organisation Response	Overseeing Organisation Response	Agreed RSA Action
<p>There is concern that the alignment of the PFS access from the internal roundabout circulatory may result in users who attempt to enter from lane-1 having to do so via utilising part of lane-2 or else cutting overrunning the verge and footway. This could lead to side swipe collisions within the circulatory or pedestrian collisions at the crossing point at the west side of the access.</p>		<p>Access via Eccleshall Road has also been shown.</p> <p>Note, access via the RA is unlikely for Tanker Deliveries, although this has been shown, as the PFS fuel loading bay is orientated such that access would be via Eccleshall Road.</p>		
<p>3.9 Problem 8 (2)</p> <p><b>Location:</b> PFS egress / Convenience access / egress onto Eccleshall Road.</p> <p><b>Summary:</b> Increased risk of failure to give way, right turn and shunt collisions.</p> <p>The adjustments to the junction results in an extra eastbound approach lane to the roundabout. There is concern that vehicles may attempt to exit the PFS / Convenience store and turn right onto Eccleshall Road against up to 4 lanes of traffic. This could increase the risk of right turning failure to give way type collisions occurring. There is also concern that vehicles</p>	<p>It is recommended that measures are taken to encourage vehicles to use to the roundabout to U-turn instead of attempting to turn right and to prohibit right turns into the access. This may include extending the traffic island and providing road markings to keep the adjacent carriageway clear to aid u-turning manoeuvres.</p>	<p><b>Problem – Agreed</b></p> <p><b>Recommendation – Agreed</b></p> <p>This generally replicates the existing where by traffic are required to pass over three lanes. In line with recommendation this splitter has been increased.</p>		



TECHNICAL NOTE

LE21539 – WALTON RA, STONE – RSA1&2

RSA PROBLEM	RSA Recommendation	Design Response	Organisation	Overseeing Organisation	Agreed RSA Action
attempting to turn right into the accesses may unexpectedly block the westbound exit from the roundabout and increase the risk of shunt collisions occurring.					
<p>3.10 Problem 9</p> <p><b>Location:</b> Stafford Road, either side of eastbound bus stop; footway width / alignment.</p> <p><b>Summary:</b> Reduced forward visibility and pinch points along footway may increase the risk of pedestrian collisions.</p> <p>There are pinch-points created within the footway that coincide with existing sharp alignment changes at the rear of the footway that reduce forward visibility. There is concern that the pinch-points could increase the risk of collisions between opposing pedestrians, vehicles exiting private accesses and the swept paths of large vehicles.</p>	It is recommended that a consistent width footway is provided and that measures are introduced to maximise the available visibility between footway users and vehicles exiting the private accesses.	<b>Problem – Agreed</b>	<b>Recommendation – Disagree</b>	This reduction in visibility is caused by the 90° generated at the boundary between the highway and 3 <sup>rd</sup> party land. This is an existing scenario and is due to be retained.	
<p>3.11 Problem 10</p> <p><b>Location:</b> Roundabout, south-western quadrant; proposed hatching.</p> <p><b>Summary:</b> Increased risk of pedestrian collisions.</p>	It is recommended that the crossing area is free from any hatching and if feasible that the kerb lines are adjusted to negate the need for hatching.	<b>Problem – Agreed</b>	<b>Recommendation – Agreed</b>	Agreed	

## TECHNICAL NOTE

LE21539 – WALTON RA, STONE – RSA1&2

RSA PROBLEM	RSA Recommendation	Design Response	Organisation	Overseeing Organisation	Response	Agreed RSA Action
Hatched road markings are proposed around the inside of the traffic lane around the south-western quadrant. These markings extend across the pedestrian crossing on the western side of the A34. There is concern that pedestrians may choose to wait within the hatched road markings, particularly should they choose to cross out of phase. This could increase the risk of those pedestrians being struck by larger passing vehicles.						
<p>3.12 Problem 11</p> <p><b>Location:</b> Roundabout, western arm; pedestrian facilities.</p> <p><b>Summary:</b> Potential risk of pedestrian collisions.</p> <p>It is noted that the scheme introduced new pedestrian crossings on the northern and southern arms. There is concern that a pedestrian desire line may be opened up across the western arm of the roundabout to / from the Convenience Store / chip shop and PFS. Whilst it is appreciated there is a crossing further west it is some 170m from the junction (the existing to the east is 85m from the junction). A lack of suitable pedestrian facilities may increase the risk of pedestrian collisions occurring.</p>	It is recommended that pedestrian desire lines are suitably assessed, and pedestrian facilities provided as necessary.	<p><b>Problem – Agreed</b></p> <p><b>Recommendation – Agreed</b></p> <p>The key desire line for pedestrians/cyclists will be along the east west axis.</p> <p>The proposed modification to the existing pedestrian provisions around this junction seeks to omit the existing pedestrian underpass to provide an at grade crossing (for all user groups) which is considered a significant betterment whilst seeking to maintain the current desire lines. The scheme also provides a new crossing facility on the southern arm of the junction.</p>				



TECHNICAL NOTE

LE21539 – WALTON RA, STONE – RSA1&2

RSA PROBLEM	RSA Recommendation	Design Organisation Response	Overseeing Organisation Response	Agreed RSA Action
		<p>The issue identified would be for NMUs coming in from the north, south or eastern arms of the junction as anyone coming in from the west can use the signal crossing identified by the audit team.</p> <p>Anyone coming from the north would be able to use the new at grade signal crossing on the northern arm of the junction. NMUs coming in from the east could cross at the existing signalised junction east of the current bus stop (which would be on the desire line) to access the northern side of the carriageway and again could use the proposed signal crossing on the northern arm. It is expected that NMUs from the south, would have to divert to the signal crossing on the western arm, however, based on the nature of this road and lack of demand from this</p>		





TECHNICAL NOTE

LE21539 – WALTON RA, STONE – RSA1&2

RSA PROBLEM	RSA Recommendation	Design Organisation	Overseeing Organisation	Agreed RSA Action
		Response	Response	
		direction (no dwellings etc) this is not considered to amount to any quantifiable demand.		
<p>3.13 Problem 12</p> <p><b>Location:</b> Southern and western arm approaches; traffic lane widths.</p> <p><b>Summary:</b> Potential risk of side swipe collisions.</p> <p>It is noted that the traffic lanes on the southern and western arm approaches to the roundabout are in some instances as narrow as 2.5m. There is concern that large vehicles may unexpectedly enter the adjacent traffic lanes in these areas which may increase the risk of side swipe type collisions occurring.</p>	<p>It is recommended that suitable traffic lane widths are provided throughout the scheme.</p>	<p><b>Problem – Agree</b></p> <p><b>Recommendation – Disagree</b></p> <p>Lane width vary to support vehicle tracking to and from the RA. A minimum lane width of 2.5m has been adopted as per CD123 cl 6.10.3)</p>		

Additional comments.

- 1) Show private drives and track.
- 2) Matches existing status quo
- 3) Error to be corrected.
- 4) Potential retaining to be provided at detailed design.
- 5) Parking to be removed.



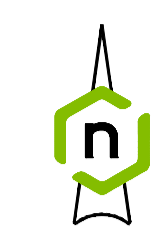
## TECHNICAL NOTE

LE21539 – WALTON RA, STONE – RSA1&2

- 6) Dropped kerbs to be retained.

# APPENDIX E

## Departures Summary



**GENERAL NOTES**

1. THIS DRAWING SHOULD NOT BE REPRODUCED IN WHOLE OR PART WITHOUT THE WRITTEN CONSENT OF LINK ENGINEERING.
2. DO NOT SCALE FROM THIS DRAWING. UNITS ARE IN METRES UNLESS OTHERWISE SPECIFIED.
3. THE CONTRACTOR IS TO CHECK ALL INFORMATION PROVIDED PRIOR TO COMMENCING WORKS AND SEEK CLARIFICATION FROM THE ENGINEER IN RESPECT TO ANY AMBIGUITIES FOUND.
4. THIS DRAWING SHOULD BE READ IN CONJUNCTION WITH ALL OTHER SCHEME SPECIFIC DRAWINGS.
5. ALL ADAPTABLE HIGHWAY WORKS SHALL BE ADOPTED VIA THE HIGHWAY AUTHORITY ACT 1980.
6. ADOPTED HIGHWAYS SHALL BE DESIGNED IN ACCORDANCE WITH THE DEPARTMENT FOR TRANSPORT'S DESIGN MANUAL FOR ROADS AND BRIDGES AND/OR SHALL COMPLY WITH THE ADOPTING LOCAL HIGHWAY AUTHORITY'S DESIGN GUIDANCE WHERE APPLICABLE.
7. ADOPTED HIGHWAYS TO BE IN ACCORDANCE WITH THE MANUAL CONTRACT DOCUMENTS FOR HIGHWAY WORKS HIGHWAY CONSTRUCTION DETAILS (HCD) AND THE SPECIFICATIONS FOR HIGHWAY WORKS (SHW) AND/OR SHALL COMPLY WITH THE ADOPTING LOCAL HIGHWAY AUTHORITY'S STANDARDS WHERE APPLICABLE.
8. ALL MATERIALS, INCLUDING SUB-GRADE WITHIN 450mm OF THE FINISHED ROAD LEVEL SHALL BE NON-FROST SUSCEPTIBLE.
9. ANY EXISTING HARD SURFACES TO BE REMOVED CAN BE CRUSHED FOR REUSE AS CAPPING OR OTHER FILL MATERIAL SUBJECT TO GRADING AND APPROVAL RELEVANT ADOPTING AUTHORITY.
10. TIE-INS TO EXISTING PAVEMENTS SHALL BE STEPPED IN CONSTRUCTION WITH MINIMUM 300mm WIDE STEPS TO EACH PAVEMENT LAYER AND BITUMINOUSLY SEALED.
11. ALL BOUND SURFACES SHALL BE TREATED WITH POLYMER MODIFIED BOND OR TACK COAT PRIOR TO PLACING OF EACH SUCCESSIVE LAYER TO BS434 AND IN ACCORDANCE WITH SHW CLAUSE 920.
12. BOUND BITUMINOUS BASE LAYERS IN EXCESS OF A TARGET 150mm THICKNESS SHALL BE LAID IN TWO SEPARATE LAYERS.
13. ALL TRAFFIC SIGNS AND ROAD MARKINGS SHALL BE PROVIDED IN ACCORDANCE WITH THE TRAFFIC SIGNS REGULATIONS AND GENERAL DIRECTIONS 2016 (INCLUDING SUBSEQUENT AMENDMENTS 1 & 2) AND THE CORRESPONDING TRAFFIC SIGNS MANUALS.
14. ALL ADOPTABLE STREETLIGHTING SHALL BE DESIGNED IN ACCORDANCE WITH THE ADOPTING LOCAL HIGHWAY AUTHORITY'S DESIGN GUIDANCE WHERE APPLICABLE. LIGHTING SHALL BE DESIGNED TO BS 5489 (2013) AND BS EN 13201 (2015) FOR THE APPROPRIATE ROUTE CLASSIFICATION.

REF- DIS001 - EXIT WIDTH  
STANDARD - CD116, CL3.28.1  
THE EXIT WIDTH FOR NORMAL ROUNDABOUTS SHOULD ACCOMMODATE ONE MORE TRAFFIC LANE THAN IS PRESENT ON THE LINK DOWNSTREAM.  
DESIGN PROVISION - NO ADDITIONAL LANE PROVISION

REF- DIS002 - EXIT WIDTH  
STANDARD - CD116, CL3.28.4  
REQUIREMENT OF STANDARD - AT A NORMAL ROUNDABOUT, IF THE DOWNSTREAM LINK IS AN ALL-PURPOSE TWO-LANE DUAL CARRIAGEWAY, THE EXIT WIDTH SHOULD BE BETWEEN 10 METRES AND 11 METRES, WITH THE EXIT TAPERING DOWN TO TWO LANES WIDE  
DESIGN PROVISION - 7.96m

REF- DIS003 - ENTRY ANGLE  
STANDARD - CD116, CL18.1  
REQUIREMENT OF STANDARD - THE ENTRY ANGLE SHOULD BE NO LESS THAN 20 DEGREES AND NO GREATER THAN 60 DEGREES FOR NORMAL AND COMPACT ROUNDABOUTS.  
DESIGN PROVISION - 67°

REF- DIS004 - ENTRY PATH RADIUS  
STANDARD - CD116, CL3.26  
REQUIREMENT OF STANDARD - AT NORMAL ROUNDABOUTS, THE ENTRY PATH RADIUS SHALL NOT EXCEED 100 METRES.  
- ENTRY PATH RADIUS EXCEEDS 100M.  
DESIGN PROVISION - 106.69m

REF- DIS010 - ENTRY PATH RADIUS  
STANDARD - CD116, CL3.26  
REQUIREMENT OF STANDARD - AT NORMAL ROUNDABOUTS, THE ENTRY PATH RADIUS SHALL NOT EXCEED 100 METRES.  
- ENTRY PATH RADIUS EXCEEDS 100M.  
DESIGN PROVISION - 251.04m

REF- DIS009 - EXIT WIDTH  
STANDARD - CD116, CL3.28.1  
THE EXIT WIDTH FOR NORMAL ROUNDABOUTS SHOULD ACCOMMODATE ONE MORE TRAFFIC LANE THAN IS PRESENT ON THE LINK DOWNSTREAM.  
DESIGN PROVISION - NO ADDITIONAL LANE PROVISION

REF- DIS008 - EXIT WIDTH  
STANDARD - CD116, CL3.28.4  
REQUIREMENT OF STANDARD - AT A NORMAL ROUNDABOUT, IF THE DOWNSTREAM LINK IS AN ALL-PURPOSE TWO-LANE DUAL CARRIAGEWAY, THE EXIT WIDTH SHOULD BE BETWEEN 10 METRES AND 11 METRES, WITH THE EXIT TAPERING DOWN TO TWO LANES WIDE  
DESIGN PROVISION - 4.20m

REF- DIS007 - EXIT WIDTH  
STANDARD - CD116, CL3.28.1  
THE EXIT WIDTH FOR NORMAL ROUNDABOUTS SHOULD ACCOMMODATE ONE MORE TRAFFIC LANE THAN IS PRESENT ON THE LINK DOWNSTREAM.  
DESIGN PROVISION - NO ADDITIONAL LANE PROVISION

REF- DIS006 - EXIT WIDTH  
STANDARD - CD116, CL3.28.4  
REQUIREMENT OF STANDARD - AT A NORMAL ROUNDABOUT, IF THE DOWNSTREAM LINK IS AN ALL-PURPOSE TWO-LANE DUAL CARRIAGEWAY, THE EXIT WIDTH SHOULD BE BETWEEN 10 METRES AND 11 METRES, WITH THE EXIT TAPERING DOWN TO TWO LANES WIDE  
DESIGN PROVISION - 9.06m

REF- DIS005 - ENTRY PATH RADIUS  
STANDARD - CD116, CL3.26  
REQUIREMENT OF STANDARD - AT NORMAL ROUNDABOUTS, THE ENTRY PATH RADIUS SHALL NOT EXCEED 100 METRES.  
- ENTRY PATH RADIUS EXCEEDS 100M.  
DESIGN PROVISION - 590.56m

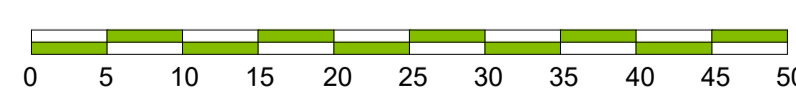
**KEY**  
--- EXISTING HIGHWAY BOUNDARY

Rev.	Amendments	Date	By
-	INITIAL ISSUE.	15.08.22	VBI

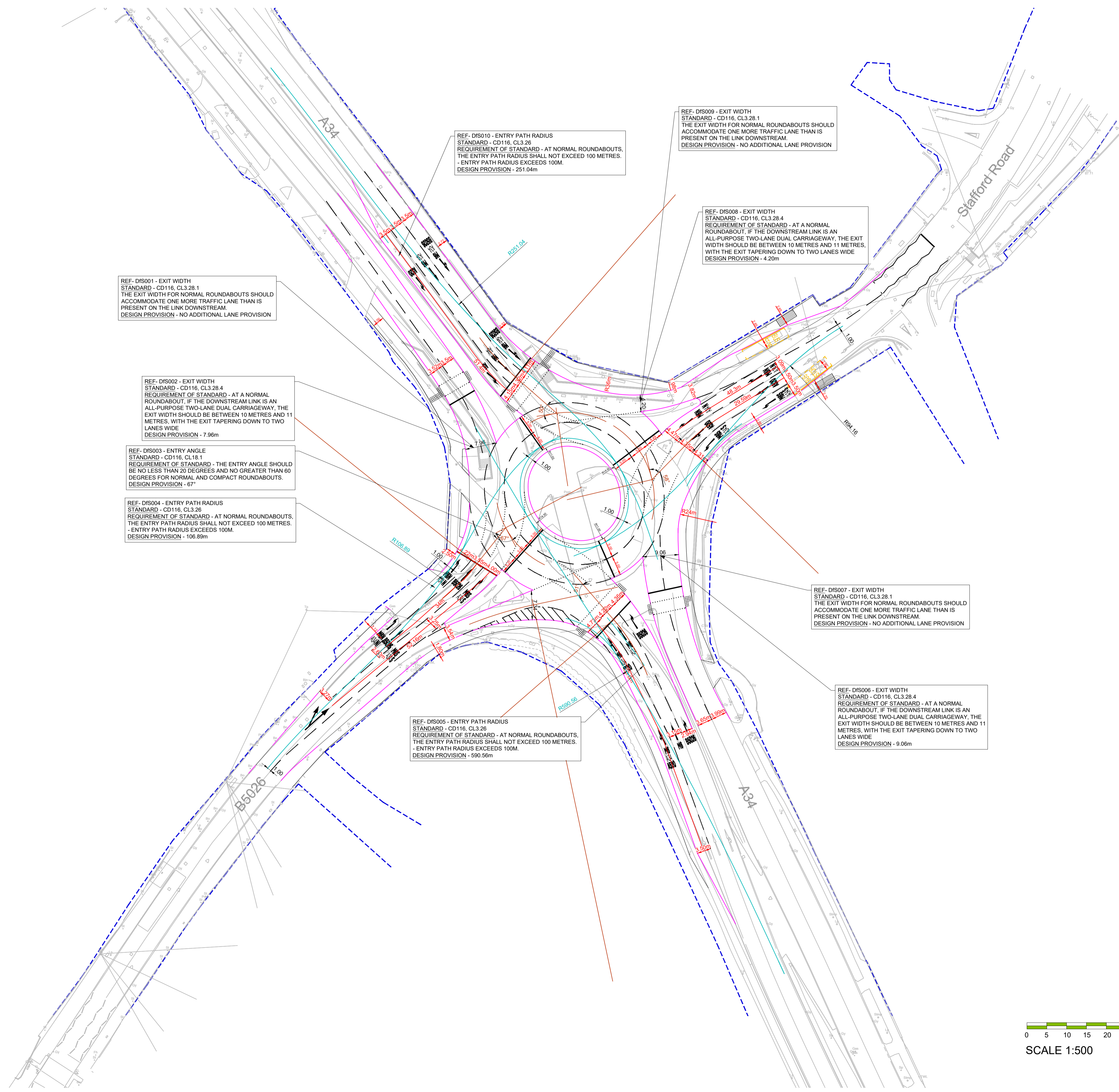
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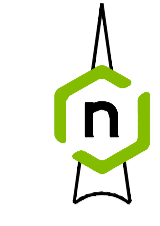
Client	
<b>BLOOR HOMES</b>	
<b>Link</b> ENGINEERING	
Project WALTON ROUNDABOUT, STONE	
Drawing PROPOSED GEOMETRY CHECK	
Scale @ A1 1:500	Drawn JWM
Checked RCG	Rev -

MS-LE-GEN-XX-DR-CE-103 INFORMATION (S2)



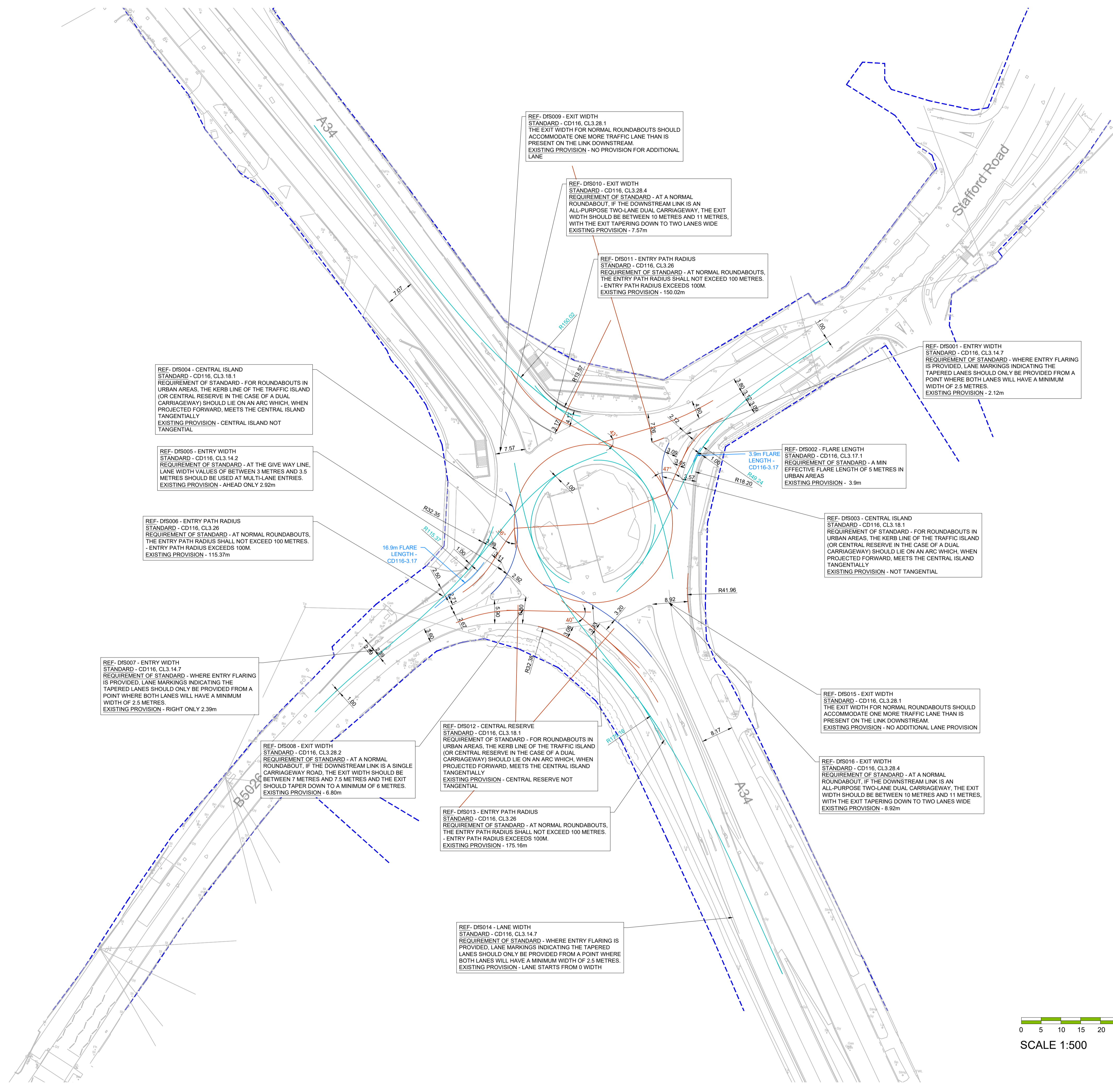
SCALE 1:500





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REF- DIS004 - CENTRAL ISLAND  
STANDARD - CD116, CL3.18.1  
REQUIREMENT OF STANDARD - FOR ROUNDABOUTS IN URBAN AREAS, THE KERB LINE OF THE TRAFFIC ISLAND (OR CENTRAL RESERVE IN THE CASE OF A DUAL CARRIAGEWAY) SHOULD LIE ON AN ARC WHICH, WHEN PROJECTED FORWARD, MEETS THE CENTRAL ISLAND TANGENTIALLY  
EXISTING PROVISION - CENTRAL ISLAND NOT TANGENTIAL

REF- DIS005 - ENTRY WIDTH  
STANDARD - CD116, CL3.14.2  
REQUIREMENT OF STANDARD - AT THE GIVE WAY LINE, LANE WIDTH VALUES OF BETWEEN 3 METRES AND 3.5 METRES SHOULD BE USED AT MULTI-LANE ENTRIES.  
EXISTING PROVISION - AHEAD ONLY 2.92m

REF- DIS006 - ENTRY PATH RADIUS  
STANDARD - CD116, CL3.26  
REQUIREMENT OF STANDARD - AT NORMAL ROUNDABOUTS, THE ENTRY PATH RADIUS SHALL NOT EXCEED 100 METRES.  
- ENTRY PATH RADIUS EXCEEDS 100M.  
EXISTING PROVISION - 115.37m

REF- DIS007 - ENTRY WIDTH  
STANDARD - CD116, CL3.14.7  
REQUIREMENT OF STANDARD - WHERE ENTRY FLARING IS PROVIDED, LANE MARKINGS INDICATING THE TAPERED LANES SHOULD ONLY BE PROVIDED FROM A POINT WHERE BOTH LANES WILL HAVE A MINIMUM WIDTH OF 2.5 METRES.  
EXISTING PROVISION - RIGHT ONLY 2.39m

REF- DIS008 - EXIT WIDTH  
STANDARD - CD116, CL3.28.2  
REQUIREMENT OF STANDARD - AT A NORMAL ROUNDABOUT, IF THE DOWNSTREAM LINK IS A SINGLE CARRIAGEWAY ROAD, THE EXIT WIDTH SHOULD BE BETWEEN 7 METRES AND 7.5 METRES AND THE EXIT SHOULD TAPER DOWN TO A MINIMUM OF 6 METRES.  
EXISTING PROVISION - 6.80m

REF- DIS012 - CENTRAL RESERVE  
STANDARD - CD116, CL3.18.1  
REQUIREMENT OF STANDARD - FOR ROUNDABOUTS IN URBAN AREAS, THE KERB LINE OF THE TRAFFIC ISLAND (OR CENTRAL RESERVE IN THE CASE OF A DUAL CARRIAGEWAY) SHOULD LIE ON AN ARC WHICH, WHEN PROJECTED FORWARD, MEETS THE CENTRAL ISLAND TANGENTIALLY  
EXISTING PROVISION - CENTRAL RESERVE NOT TANGENTIAL

REF- DIS013 - ENTRY PATH RADIUS  
STANDARD - CD116, CL3.26  
REQUIREMENT OF STANDARD - AT NORMAL ROUNDABOUTS, THE ENTRY PATH RADIUS SHALL NOT EXCEED 100 METRES.  
- ENTRY PATH RADIUS EXCEEDS 100M.  
EXISTING PROVISION - 175.16m

REF- DIS014 - LANE WIDTH  
STANDARD - CD116, CL3.14.7  
REQUIREMENT OF STANDARD - WHERE ENTRY FLARING IS PROVIDED, LANE MARKINGS INDICATING THE TAPERED LANES SHOULD ONLY BE PROVIDED FROM A POINT WHERE BOTH LANES WILL HAVE A MINIMUM WIDTH OF 2.5 METRES.  
EXISTING PROVISION - LANE STARTS FROM 0 WIDTH

REF- DIS009 - EXIT WIDTH  
STANDARD - CD116, CL3.28.1  
THE EXIT WIDTH FOR NORMAL ROUNDABOUTS SHOULD ACCOMMODATE ONE MORE TRAFFIC LANE THAN IS PRESENT ON THE LINK DOWNSTREAM.  
EXISTING PROVISION - NO PROVISION FOR ADDITIONAL LANE

REF- DIS010 - EXIT WIDTH  
STANDARD - CD116, CL3.28.4  
REQUIREMENT OF STANDARD - AT A NORMAL ROUNDABOUT, IF THE DOWNSTREAM LINK IS AN ALL-PURPOSE TWO-LANE DUAL CARRIAGEWAY, THE EXIT WIDTH SHOULD BE BETWEEN 10 METRES AND 11 METRES, WITH THE EXIT TAPERING DOWN TO TWO LANES WIDE  
EXISTING PROVISION - 7.57m

REF- DIS011 - ENTRY PATH RADIUS  
STANDARD - CD116, CL3.26  
REQUIREMENT OF STANDARD - AT NORMAL ROUNDABOUTS, THE ENTRY PATH RADIUS SHALL NOT EXCEED 100 METRES.  
- ENTRY PATH RADIUS EXCEEDS 100M.  
EXISTING PROVISION - 150.02m

REF- DIS001 - ENTRY WIDTH  
STANDARD - CD116, CL3.14.7  
REQUIREMENT OF STANDARD - WHERE ENTRY FLARING IS PROVIDED, LANE MARKINGS INDICATING THE TAPERED LANES SHOULD ONLY BE PROVIDED FROM A POINT WHERE BOTH LANES WILL HAVE A MINIMUM WIDTH OF 2.5 METRES.  
EXISTING PROVISION - 2.12m

REF- DIS002 - FLARE LENGTH  
STANDARD - CD116, CL3.17.1  
REQUIREMENT OF STANDARD - A MIN EFFECTIVE FLARE LENGTH OF 5 METRES IN URBAN AREAS  
EXISTING PROVISION - 3.9m

REF- DIS003 - CENTRAL ISLAND  
STANDARD - CD116, CL3.18.1  
REQUIREMENT OF STANDARD - FOR ROUNDABOUTS IN URBAN AREAS, THE KERB LINE OF THE TRAFFIC ISLAND (OR CENTRAL RESERVE IN THE CASE OF A DUAL CARRIAGEWAY) SHOULD LIE ON AN ARC WHICH, WHEN PROJECTED FORWARD, MEETS THE CENTRAL ISLAND TANGENTIALLY  
EXISTING PROVISION - NOT TANGENTIAL

REF- DIS015 - EXIT WIDTH  
STANDARD - CD116, CL3.28.1  
THE EXIT WIDTH FOR NORMAL ROUNDABOUTS SHOULD ACCOMMODATE ONE MORE TRAFFIC LANE THAN IS PRESENT ON THE LINK DOWNSTREAM.  
EXISTING PROVISION - NO ADDITIONAL LANE PROVISION

REF- DIS016 - EXIT WIDTH  
STANDARD - CD116, CL3.28.4  
REQUIREMENT OF STANDARD - AT A NORMAL ROUNDABOUT, IF THE DOWNSTREAM LINK IS AN ALL-PURPOSE TWO-LANE DUAL CARRIAGEWAY, THE EXIT WIDTH SHOULD BE BETWEEN 10 METRES AND 11 METRES, WITH THE EXIT TAPERING DOWN TO TWO LANES WIDE  
EXISTING PROVISION - 8.92m

KEY

- - - - - EXISTING HIGHWAY BOUNDARY

Rev.	Amendments	Date	By
-	INITIAL ISSUE.	16.08.22	VBI

Revisions

Client  
**BLOOR HOMES**

Project  
**Link ENGINEERING**

Project  
**WALTON ROUNDABOUT, STONE**

Drawing  
**EXISTING GEOMETRY CHECK**

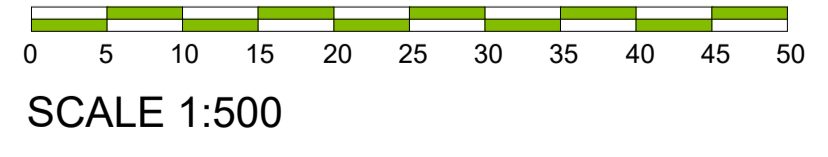
Scale @ A1  
1:500

Drawn  
JWM

Checked  
RCG

Rev  
-

DWG No  
MS-LE-GEN-XX-DR-CE-102  
Status  
INFORMATION (S2)





keep up with mode:





9<sup>th</sup> December 2022

Dear [REDACTED]

**PLAN FOR STAFFORD**  
**DEVELOPMENT WITHIN THE WOODSEAVES VILLAGE**

Having visited the Plan for Stafford Consultation evening in Gnosall, we as executors of our late fathers estate ( Mr T Talbot ) were pleased to see that in the plan you have included land at the rear of Woodseaves School which his estate owns for future development.

We wish you to know that we are more than willing to cooperate with Stafford Borough Council in the future development of this site for housing needs. We specifically would wish a percentage of the houses built to be occupied by people with a local connection to the High Offley Parish Councils area. Woodseave`s as you know falls in this Parish Councils area and is central to it. Also that a percentage of the properties to be bungalows as there is a need for this type of property in the local area.

As part of the overall development and to give Woodseave`s facilities that it has lacked for for many years, we are prepared to offer the following land with a no cost implication.

1, An area of land adjacent to the rear and adjoining Woodseave`s School the equivalent to the current school field. This area would be divide in two to give a school car-park accessed through the new development, ( coloured blue on the attached plan ). Additional school green-space would be provided behind the current school buildings, ( coloured red on the attached plan ) The car park could also be used by the parishioners who are using the Play-park and or the Allotments.

2, An area of land adjacent to the car-park and additional school green-space stated in 1, above of approximately 0.5 hectares for the development of a recreational area to include a play-area and a picnic area. Similar to The Acres play area in Gnosall. ( coloured green on the attached plan ). Access would be from the new development and the access lane along side the school boundary from Dickies Lane. ( coloured yellow on the attached plan )

3, An area of land of approximately 0.5 hectares in the North Eastern corner of the site for allotments. We know there is a need for allotments in the High Offley Parish area. A request with the requisite number of parishioners signatures was put to the Parish Council a few years ago and recent enquiries show the need still exists. Access to the allotments could be from two points, one from within the new development and one from access track alongside the school boundary, this is in the ownership of the estate of Mr T Talbot.

4, The secondary access to the allotments and recreational area is using the existing track from the corner of Dickies Lane. This would give parishioners that live in the southern end of Woodseave`s and the parishioners that live on Willowcroft and Dickie`s Lane a safe access without having to go through the new development off the A519.  
( marked yellow on the attached plan )

5, For clarification, the area of land in the north east corner of the site, about 30-35 years ago was in-filled with inert material mostly hardcore to the lower levels of fill and topsoil to a depth of approximately 2mtrs. This was carried out to level the ground area to make it more productive and increase drainage to the field. A SCC Waste Licence was issued for this work, and was compliant with the conditions of the licence.

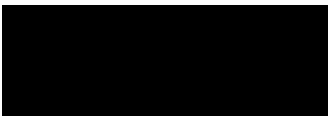
We look forward to a positive response to the above.

Yours Faithfully,

Mrs Janet Fenton, Executor to the late Mr T Talbot's estate.



Mr Nigel Talbot, Executor to the late Mr T Talbot's estate.



9/12/22

Attached are:-

Two site plans, and Copy of the Grant of Probate

To:-



Forward planning team,  
Planning Department  
Stafford BC  
Riverside, Stafford,  
ST16 3AQ

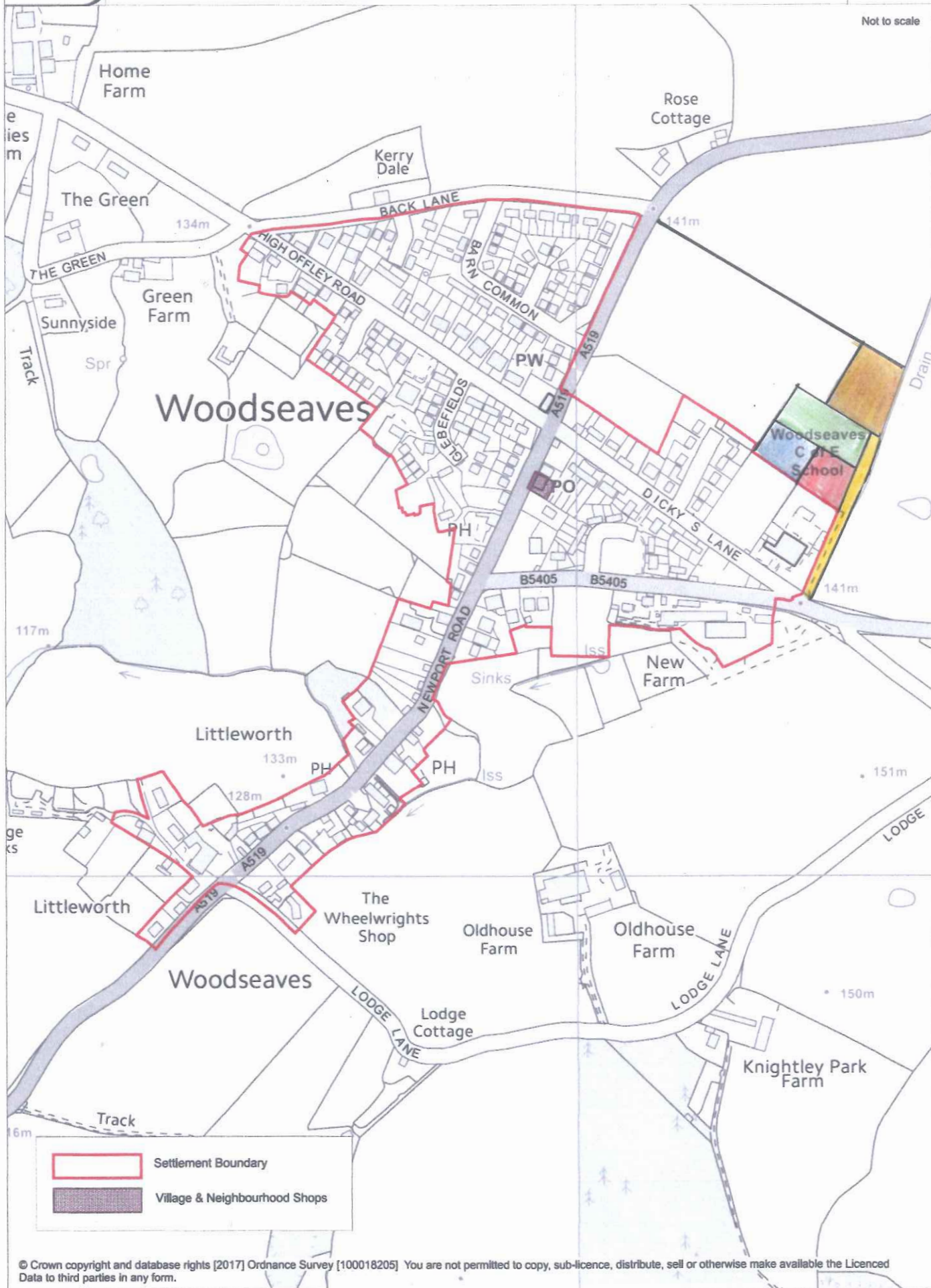




# Woodseaves Adopted 31 January 2017



Not to scale

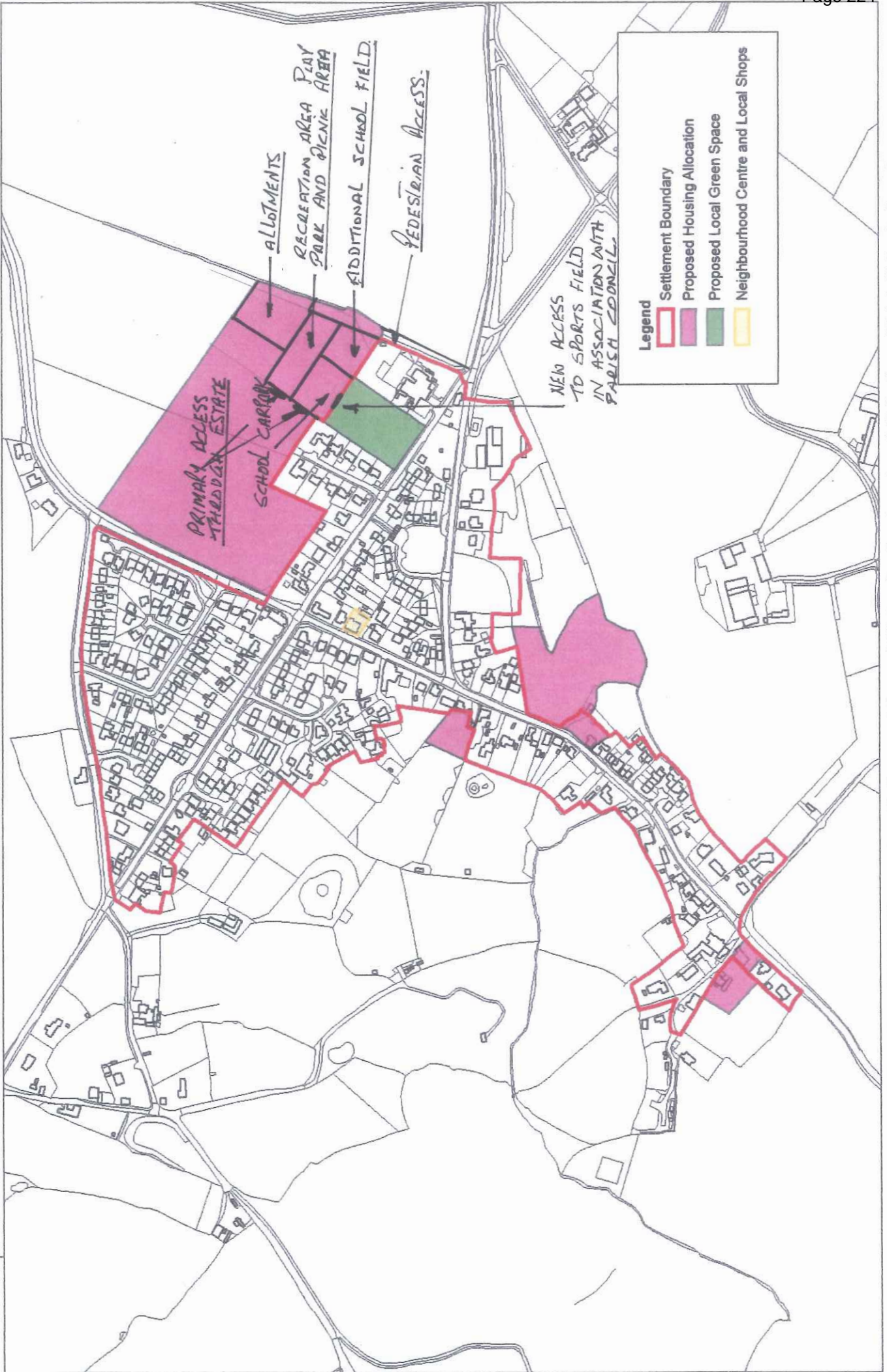


Date: August 2022

Not to Scale



# Woodseaves



---

**From:** Collis, Andrew [REDACTED]  
**Sent:** 12 December 2022 10:06  
**To:** Strategic Planning  
**Subject:** Stafford Local Plan Review  
**Attachments:** Stafford Local Plan 2040 - Preferred Options - Gladman Developments 091222.pdf

Dear Strategic Planning Team.

Please find attached, Gladman's representations to the current regulation 18 'preferred options' consultation.

I would be grateful if you could confirm receipt of the attached.

Kind regards  
Andy.

**Andy Collis**  
Planner

---

[REDACTED]  
[www.gladman.co.uk](http://www.gladman.co.uk)



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Stafford Borough  
Local Plan 2020 - 2040

**Preferred Options Consultation**

December 2022



[gladman.co.uk](https://www.gladman.co.uk)



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# 1 INTRODUCTION

## 1.1 Introduction

1.1.1 Gladman Developments Ltd (Gladman) welcome the opportunity to comment on the Stafford Borough Local Plan 2020 - 2040 Preferred Options consultation and request to be updated on future consultations and the progress of the emerging Local Plan.

1.1.2 At the outset, we wish to express our support for the preparation of a new Local Plan for Stafford Borough. The current Local Plan was adopted in 2014 and pre-dates substantive changes in national planning policy and guidance. Changes in local circumstances and priorities further justify the need for a new Local Plan. It is fundamental to the operation of the plan-led system that Stafford adopts an up-to-date Local Plan that can meet the development needs of the authority.

1.1.3 Our comments are submitted with the intention of assisting the Council in the preparation of its emerging Local Plan and we are keen to remain involved throughout the process through to adoption.

## 2 CONTEXT

### 2.1 National Planning Policy Framework

2.1.1 The revised National Planning Policy Framework (NPPF or Framework) was published in July 2021 and came into immediate effect. The NPPF is supported by the National Planning Practice Guidance (PPG).

2.1.2 The NPPF sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally prepared plans for housing and other development can be produced. Requiring plans to set out a vision and a framework for future development and seek to address the strategic priorities for the area. Local Plans should be prepared in line with procedural and legal requirements and will be assessed on whether they are considered 'sound'.

2.1.3 The NPPF reaffirms the Government's commitment to ensuring up-to-date plans are in place which provide a positive vision for the areas which they are responsible for. The presumption in favour of sustainable development applies to plan making and plans should positively seek opportunities to meet the development needs of their area, and that strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas.

2.1.4 In particular, Paragraph 16 of the Framework states that Plans should:

**“a) Be prepared with the objective of contributing to the achievement of sustainable development;**

**b) Be prepared positively, in a way that is aspirational but deliverable;**

**c) Be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;**

**d) Contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;**



**e) Be accessible through the use of digital tools to assist public involvement and policy presentation; and**

**f) Serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)."**

2.1.5 Paragraph 35 of Framework sets out four tests that must be met for Local Plans to be considered sound. These are:

- **Positively Prepared** – The Plan should be prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.
- **Justified** – the plan should be an appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base.
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with National Policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

## 2.2 Planning Practice Guidance

2.2.1 The Planning Practice Guidance was first published by the Government to provide clarity on how specific elements of the NPPF should be interpreted. The PPG has been updated to reflect the changes introduced by the revised NPPF to national planning policy.

## 2.3 Duty to Cooperate

2.3.1 Section 33(A) of the Planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act, places a 'Duty to Co-operate' on local authorities and other specified organisations. The local planning framework for Stafford Borough

should therefore be based on joint working and co-operation with neighbouring authorities to address cross-boundary strategic issues. As demonstrated through the outcome of the 2020 Sevenoaks District Council Local Plan examination and subsequent Judicial Review, if a Council fails to satisfactorily discharge its Duty to Cooperate, this cannot be rectified through modifications and an Inspector must recommend non-adoption of the Plan.

- 2.3.2 Whilst Gladman recognise that the Duty to Cooperate is a process of ongoing engagement and collaboration, as set out in the PPG it is intended to produce effective policies on cross-boundary strategic matters. In this regard, Stafford Borough must be able to demonstrate that it has engaged and worked with neighbouring authorities, alongside their existing joint working arrangements, to satisfactorily address cross-boundary strategic issues. This is not simply an issue of consultation but a question of effective cooperation.
- 2.3.3 The draft Plan recognises the need for ongoing engagement with neighbouring authorities and key stakeholders to share evidence and develop planning solutions across a range of topics. It is also clear that the Council have held an active role in cross-boundary planning matters in preparing the new Local Plan to its current form, most notably through its willingness to accommodate a proportion of unmet need from neighbouring authorities.
- 2.3.4 The Local Plan preferred options consultation, however, is not accompanied by a SoCG or Duty to Co-operate Statement which provides an overview of the cross-boundary, strategic issues that have been addressed to date through the preparation of the new Local Plan.
- 2.3.5 As such at this stage, it is not possible to ascertain duty to cooperate partners views of the new Local Plan and where areas of agreement or disagreement may arise. Following publication of either a signed SoCG and / or Duty to Co-operate Statement, Gladman reserve the right to submit further comments on the Council's compliance with the Duty to Co-operate at further stages of the plan-making process.

## 2.4 Sustainability Appraisal

- 2.4.1 In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in Local Plans must be subject to Sustainability Appraisal (SA). Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, SA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the Local Plan's proposals on sustainable development when judged against reasonable alternatives.
- 2.4.2 Stafford Borough Council should ensure that the results of the SA process clearly justify its policy choices. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed, and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the Local Plan's decision-making and scoring should be robust, justified and transparent.

## 3 LOCAL PLAN 2020 - 2040 PREFERRED OPTIONS CONSULTATION

### 3.1 Background

3.1.1 Stafford Borough's currently adopted local plan is twofold. The first part comprises the Plan for Stafford Borough Part 1 which was adopted in June 2014. The Part 1 Plan sets out the vision, key objectives and spatial strategy for the Borough and is the over-arching policy document to which any other planning policy documents must comply.

3.1.2 The second part comprises the Plan for Stafford Borough Part 2 which is the daughter document to the Part 1 Plan. The Part 2 was adopted in January 2017 and sets out the approach to development in the sustainable settlement hierarchy by establishing settlement boundaries for Stafford, Stone and the Key Service Villages, and boundaries for the Recognised Industrial Estates

3.1.3 The Preferred Options Version of the Local Plan 2020-2040 marks the third stage of public consultation. It builds upon previous consultations and sets out the proposed development strategy, site allocations and development management policies for the Borough. It also provides the opportunity for the Council to respond to the numerous significant changes to the planning system since the Part 1 Plan was adopted in 2014.

3.1.4 Through this submission, Gladman have highlighted areas where the new Local Plan requires further clarification or justification prior to consultation on the Publication Plan which is anticipated to take place in Summer 2023.

### 3.2 Overall Plan Period

3.2.1 The Council are seeking to progress the new Local Plan based on a plan period between 2020 to 2040. Paragraph 22 of the NPPF states that strategic policies in Local Plans should look ahead over a minimum of 15 years from the date of adoption.

3.2.2 The current timescale for the remaining stages of the Local Plan is set out in the introductory chapter of the Preferred Options Plan. This anticipates Publication in

Summer 2023, with Submission following in November 2023. Examination is then projected to commence in February 2024 with Adoption expected in November 2024. If this timescale is met, the Local Plan will provide a minimum-15-year period from adoption as required by national policy.

3.2.3 The 24-month timescale from this regulation 18 consultation to adoption does seem somewhat optimistic, however, and offers little flexibility should preparation of the plan slip. It may be prudent for the Council to consider extending the plan period beyond 2040 to ensure the requirements of NPPF paragraph 22 are still met in the event of any delays to the plan-making process.

3.2.4 The Council will no doubt be aware that neighbouring South Staffordshire District Council have recently published their Publication Plan which, whilst largely unchanged from the preceding Preferred Options, has extended the plan period by a year from 2038 to 2039 to presumably allow a 15 year forward horizon from anticipated adoption in 2024. A similar pragmatic approach may be required in Stafford Borough in the event of any substantive delays to the plan-making process.

### 3.3 Housing Need and Requirement

3.3.1 Policy DS1 states that in the period 2020 to 2040, provision will be made for 10,700 new homes (equivalent to 535dpa) and at least 80 hectares of new employment land. Paragraphs 1.2-1.6 explain how the proposed scale of housing development has been established. This is also addressed in the Housing and Employment Land Requirement Topic Paper (2022), the Economic and Housing Development Needs Assessment 2020 (EHDNA) and the Interim Sustainability Appraisal (2022)

3.3.2 The 535dpa requirement has two parts. The first is the borough's own housing need of 435dpa, informed by the EHDNA. The second element allows for 2,000 homes (equivalent to 100dpa) as a contribution to meeting unmet need of other authorities in the region, which are subject to ongoing negotiations with other regional authorities.

- 3.3.3 Gladman acknowledge that the Council have provided a modest uplift to the standard method local housing need figure of 391dpa however this is largely as a consequence of its contribution to unmet housing needs from neighbouring authorities. We consider, for reasons set out below, that the proposed scale of development remains insufficiently ambitious and fails to support sustainable economic growth in the Borough over the plan period.
- 3.3.4 The EHDNA identifies a range of economic-led scenarios, from past trends to more ambitious future growth, with a range of future housing need identified which are required to support the scenarios. These range of housing needs scenarios include 435dpa to support the baseline jobs growth, 540dpa to support the baseline jobs growth plus 50%, 647dpa to support the regeneration scenario including jobs growth associated with Stafford Station gateway and the proposed new garden community, and 683dpa to support the Past Trends scenario. Furthermore, the EHDNA also identifies a significant affordable housing need of between 252dpa and 389dpa, dependent on the proportion of income used in the calculation.
- 3.3.5 The EDHNA is explicit that given *“the aspirations for growth across the Borough, including the strategic growth identified around a new Garden Community and Stafford Station Gateway, **it will be important that the Borough identifies a level of future housing that does not act as a drag on future economic growth**”*<sup>1</sup> (emphasis added).
- 3.3.6 The decision to proceed with the ‘baseline jobs growth’ scenario for establishing a housing requirement does not properly reflect the economic potential in the Borough and Gladman state that there is a strong case for an increased level of housing growth to support economic growth in the Borough and address critical housing affordability issues. Such an approach would ensure that the plan is positively prepared, justified, and effective.

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<sup>1</sup> Stafford Borough Council 2020: Economic and Housing Development Needs Assessment. Paragraph 10.90.

3.3.7 An increased housing requirement would not be out of step with historic housing delivery in the Borough, which has been significantly greater than the proposed housing requirement in most years since 2001. The PPG confirms that such situations should be taken into account when considering whether it is appropriate to plan for a higher level of need.

Table 1: Historic Housing Delivery in Stafford BC<sup>2</sup>

Year	Completions	Surplus / Shortfall v 535dpa
2001/02	824	+289
2002/03	839	+304
2003/04	434	-101
2004/05	699	+164
2005/06	735	+200
2006/07	454	-81
2007/08	702	+167
2008/09	601	+66
2009/10	305	-232
2010/11	339	-196
2011/12	425	-110
2012/13	306	-229
2013/14	411	-124
2014/15	428	-107
2015/16	688	+153
2016/17	1010	+475
2017/18	863	+328
2018/19	699	+164
2019/20	752	+217
2020/21	614	+79
2021/22	506	-29
<b>Average</b>	<b>601dpa</b>	

<sup>2</sup> Data taken from Stafford BC Housing Land Supply Statement 2022 and Live Table 122 Housing Supply: net additional dwellings, by local authority district.

- 3.3.8 As demonstrated in Table 1, the Council average delivery of 601 new homes each year over a 21-year period, covering a full economic cycle. A lower rate of provision is largely restricted to those years where delivery was affected by the housing moratorium that followed the 2008 recession. It clearly demonstrates that market demand has delivered and sustained a level of new housing significantly above the currently proposed Local Plan requirement.
- 3.3.9 For the reasons detailed above, Gladman are of the strong opinion that the emerging Local Plan should be more aspirational in its plans for housing provision as per paragraph 16(b) of the NPPF which states plans should be *"be prepared positively, in a way that is aspirational but deliverable"*. An increased housing requirement aligned with the higher growth scenarios detailed in the Council's own evidence base (EHDNA 2020) would quite clearly support economic growth and deliver more affordable housing across the Borough in response to the identified need. Based on historic delivery trends in Stafford, the Council could also be confident that an increased housing provision would be deliverable over a full plan period.
- 3.3.10 In respect of unmet housing needs from neighbouring authorities, it is essential that the Council continue to work collaboratively with neighbouring authorities to agree the full extent of any unmet need that may need to be accommodated within the Borough. In principle, Gladman support the Council's decision to increase the housing target by 2,000 dwellings to contribute toward the unmet housing needs of the Black Country authorities. However, Gladman are concerned that without a signed SoCG between constituent authorities, it is difficult to consider whether this level of housing is sufficient to meet the wider needs of the area. This is pertinent as the draft Local Plan states that the issue of unmet need remains subject to ongoing negotiations with other regional authorities.
- 3.3.11 Since effective cooperation is an ongoing issue, Gladman reserve the right to provide further comments in relation to this matter once further evidence and signed statements become available.



## 3.4 Development Strategy

- 3.4.1 Policy DS1 also sets out the broad spatial distribution of housing development, including 59% of housing supply directed to Stafford, 24% in the new garden community at Meecebrook and 7% in Stone. Table 1 of the draft Plan sets out the components of the housing land supply over the plan period. This details that there have been 1,120 homes completed since 2020, there are existing commitments for 5,925 homes and 5,535 dwellings are to be delivered on new allocations. Together, the Plan identifies or allocates sufficient land for approximately 12,580 homes, which provides a 17% supply buffer above the proposed housing requirement.
- 3.4.2 On the face of it the supply side buffer appears healthy. The future supply of housing land in the Borough, however, is heavily predicated on the successful delivery of Meecebrook Garden Village (3,000 dwellings of the residual 5,535 dwellings – or 54% of future supply in the plan period). If the site delivers at a slower rate than forecast (something we consider very likely and return to below), there will be little prospect of the Borough's housing needs being satisfied, even with the 17% cushion the Council is proposing to build in. Given the way the Plan's strategy is so heavily reliant on this strategic site, the uplift for flexibility should be increased to 20% and additional land should be allocated to address this.
- 3.4.3 Turning to the proposed Garden Village at Meecebrook, the site is allocated to provide at least 3,000 homes and necessary infrastructure within the plan period, and a further 3,000 homes beyond the end of the plan period in 2040. The housing trajectory in the appendices of the draft Plan envisages that the site will begin delivering new homes in 2030, at a build-out rate of 300dpa till the end of the plan period in 2040.
- 3.4.4 Lichfields' Start to Finish Report (2020) provides a useful benchmark to understand the delivery of strategic sites, reflecting national evidence on lead-in times for large strategic sites such as Meecebrook. The report notes that for sites of 2000+ units, the average time from validation to approval of first Reserved Matters is 6.1 years with an additional 2.3 years until the first completions. In terms of build-out rates, the

report demonstrates that the average annual build-out rate for a scheme of 2,000+ dwellings is 160dpa, and that delivery only starts to 'ramp up' after 5 years. Indeed, the Council's own Lead in and Build Rate Assumptions Topic Paper (2022) references the study and proposes an annual build rate assumption of 160 dwellings for sites larger than 2,000 units.

- 3.4.5 Viewed in this context, the forecasted delivery of Meecebrook Garden Village appears to be highly unrealistic and there is no justification for both the proposed lead-in times and build out rates for the site as detailed within the draft Plan. In respect of the anticipated lead in times for the site, whilst we acknowledge that the site has Garden Community status and the Council has received over £1million of government funding to help with this opportunity, it is still the case that the proposals include significant infrastructure projects such as strategic highways infrastructure upgrades, comprehensive pedestrian and cycle provisions, community and educational facilities and primarily, the delivery of a new railway station. In our view, the scale of the upfront infrastructure required will lead to a longer period before new homes can be built than the Council currently anticipate.
- 3.4.6 If an outline planning application were to be validated in November 2024 on adoption of the Plan (although this would once more appear ambitious), against the average lead-in times detailed in Start to Finish, the first completions would not occur until early 2033 (2033/34 monitoring year). This would mark a 3-year delay against the forecasts within the trajectory and result in at least 900 dwellings not being delivered during the plan period as currently anticipated by the Council. Moreover, if delivery rates were more in line with national averages, a further 800 dwellings could also be at risk of not being delivered as expected. This is a significant proportion of the Borough's forward housing land supply.
- 3.4.7 The Local Plan, at its starting point, is therefore highly reliant on the timely and consistent delivery of Meecebrook Garden Village, to provide much of its future housing supply. 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 should not be reassessed, as currently stated by the Plan, but rather the Council must increase the housing supply through an increased buffer and with a greater number of small and medium sized site allocations than can deliver in the early part of the Plan period.

### 3.5 Development Management Policies

#### **Policy 4: Climate change development requirements**

- 3.5.1 Policy 4 requires the production of an embodied carbon assessment for all major development. Part B of the policy seeks for all residential development to demonstrate net zero carbon operation through an energy statement, it also looks for no on-site fossil fuel combustion; minimised energy use and maximisation of on-site renewables. In terms of the minimised energy the policy looks for a space heating demand of less than 15kWh/m<sup>2</sup>/year and operational energy use of less than 35kWh/m<sup>2</sup>/year. It also suggests alternatively, compliance can be demonstrated through Passivhaus Standard accreditation.
- 3.5.2 Gladman are broadly supportive of the Council's desire to facilitate truly sustainable housing development albeit we consider Policy 4 would benefit from further refinement prior to the regulation 19 consultation. At the same time, however, it is crucial to recognise the need to move towards greater energy efficiency via a nationally consistent set of standards and timetable, which is universally understood and technically implementable.
- 3.5.3 Updated building regulations for England and Wales took effect from June 2022 and included amendments to Part F and Part L, as well as the release of new documents relating to Part O and Part S. These changes are widely viewed as interim measures prior to the implementation of the Governments Future Homes Standards and Future Buildings Standards, planned for 2025. The 2021 Building Regulations interim uplift will deliver homes that are expected to produce 31% less CO<sub>2</sub> emissions compared to current standards. The implementation of the Future Homes Standard in 2025 will

ensure that new homes will produce at least 75% lower CO2 emissions than one built to previous energy efficiency requirements.

- 3.5.4 As set out in the NPPF, all policies should be underpinned by relevant and up to date evidence, which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned. Therefore, if the Council wishes to move away from these national standards it will need to provide up to date and locally specific evidence as to why this is the case.
- 3.5.5 In the Council's supporting evidence there is currently an absence of any justification for the requirement for new development to meet the requirement for the space heating demand of less than 15kWh/m<sup>2</sup>/year and operational energy use of less than 35kWh/m<sup>2</sup>/year as set out with Part B of the policy.
- 3.5.6 Under current Building Regulations, all new dwellings must achieve a mandatory level of water efficiency of 125 litres per day per person. Thus, if the Council wishes to adopt the optional standard for water efficiency of 110 litres per person per day (Part E of the policy), then the Council should justify doing so by applying the criteria set out in the PPG<sup>3</sup>.

#### **Policy 24: Homes for Life**

- 3.5.7 Policy 24 states that on major developments at least 10% of all new build dwellings should be built to M4(2) standards. It goes on to state that on developments that would provide 10 or more affordable dwellings at least 10% of those dwellings should be M4(3) wheelchair accessible standard.
- 3.5.8 Gladman refer to the PPG which provides additional guidance on the use of these optional technical standards. The Council need to ensure that this policy is in line with the guidance and that the justification and specific detail of the policy take account of the various factors which the PPG refers to:

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<sup>3</sup> PPG ID 56-013-20150327 to 56-017-20150327

*“Based on their housing needs assessment and other available datasets it will be for the local planning authorities to set out how they intend to approach the need for Requirement M4(2) (accessible and adaptable dwellings), and / or M4(3) (wheelchair user dwellings), of the Building Regulations. There is a wide range of published official statistics and factors which local planning authorities can consider and take into account, including:*

- *The likely future need for older and disabled people (including wheelchair user dwellings).*
- *Size, location, type and quality of dwellings needed to meet specifically evidenced needs (for example retirement homes, sheltered homes, or care homes).*
- *The accessibility and adaptability of existing stock.*
- *How needs vary across different tenures.*
- *The overall impact of viability.”<sup>4</sup>*

**3.5.9** Whilst Gladman are supportive of the Council seeking to include a policy in relation to specialist housing provision in principle, such a policy must be based on appropriate evidence to justify the approach in seeking to apply the higher optional technical standards. The Council will also need to ensure that the viability implications of the M4(2) and M4(3) requirements are fully considered in relation to the viability assessments of both market housing and older persons housing.

**3.5.10** The Council should also note that the Government response to the ‘Raising accessibility standards for new homes’<sup>5</sup> states that the Government proposes to mandate the current M4(2) requirement in Building Regulations as a minimum for all new homes, with M4(1) applying in exceptional circumstances. This will be subject to a further consultation on the technical details and will be implemented in due course through the Building Regulations. M4(3) would continue to apply as now where there

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<sup>4</sup> PPG ID: 56-007-20150327

<sup>5</sup> <https://www.gov.uk/government/consultations/raising-accessibility-standards-for-new-homes/outcome/raising-accessibility-standards-for-new-homes-summary-of-consultation-responses-and-government-response#government-response>

is a local planning policy is in place and where a need has been identified and evidenced.

- 3.5.11 Part D of Policy 24 requires all new homes to as a minimum meet the nationally described space standards (NDSS). If the Council wishes to apply the optional NDSS to all dwellings, then this should only be done in accordance with paragraph 130f and footnote 49 of the NPPF. Footnote 49 confirms:

*"49. Planning policies for housing should make use of the Government's optional technical standards for accessible and adaptable housing, where this would address an identified need for such properties. Policies may also make use of the nationally described space standard, where the need for an internal space standard can be justified."*

- 3.5.12 Furthermore, with reference to the NDSS, the PPG<sup>6</sup> confirms:

*"Where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies".*

- 3.5.13 If the Council wishes to adopt this optional standard, it should be justified by meeting the criteria set out in the national policy, including need, viability and impact on affordability.

### **Policy 31: Housing Mix and Density**

- 3.5.14 Part B of Policy 31 looks for certain sites (including Meecebrook) to provide plots equivalent to 1% of all dwellings to be made available to self or custom builders as serviced plots at reasonable market rates.
- 3.5.15 Gladman broadly support the inclusion of a policy in respect of self-build and custom-build housing in line with current government thinking and objectives, however we would question whether Meecebrook is the most appropriate site to provide the vast majority of such plots. Gladman are not clear whether there is even a demand from

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<sup>6</sup> PPG ID: 56-020-20150327

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custom and self-builders to live on sites within a larger residential development scheme, noting that the latest Self-Build Register shows a clear preference for plots in more rural areas of the Borough.

- 3.5.16** Gladman considers that alternative policy mechanisms could be used to ensure a reliable and sufficient provision of self & custom build opportunities across the Borough including allocation of small and medium scale sites specifically for self & custom build housing and permitting self & custom build outside but adjacent to settlement boundaries on sustainable sites.

## 4 CONCLUSIONS

### 4.1 Summary

- 4.1.1 Gladman welcomes the opportunity to comment on the Preferred Options Local Plan for Stafford Borough. These representations have been drafted with reference to the revised National Planning Policy Framework and the associated updates that were made to Planning Practice Guidance.
- 4.1.2 Gladman have provided comments on issues that have been identified in the Council's consultation material and recommend that the matters raised are carefully explored during the process of undertaking the new Local Plan.
- 4.1.3 In line with the economic aspirations set out by the Council, Gladman consider that Council should adopt a more positive planning strategy for housing and in this regard Gladman would not support the adoption of a housing requirement of 535dpa as currently proposed. Furthermore, the assumptions on delivery from the large, strategic site at Meecebrook appear overly ambitious and provides further justification for an increased level of flexibility in the Plan and the need to allocate additional small and medium size sites.
- 4.1.4 We hope you have found these representations informative and useful towards the preparation of the Stafford Borough Local Plan 2020-2040 and Gladman welcome any future engagement with the Council to discuss the considerations within this representation.





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**From:** John Pearce [REDACTED]  
**Sent:** 08 December 2022 16:19  
**To:** Strategic Planning  
**Subject:** Stafford Local Plan Preferred Options Consultation  
**Attachments:** 221208 Response to Preferred Options FINAL.pdf; Land off Shaws Lane, Eccleshall.pdf; Land to The South of Cross Butts, Eccleshall.pdf; 419 - SK12.pdf

Dear Sir or Madam

Please find attached a response to the Preferred Options Consultation submitted on behalf of Muller Property Group. These comments have been submitted via your online questionnaire service as well so hopefully you've got them on your system already but here completeness.

If you could confirm receipt that would be appreciated.

Kind regards

**John Pearce** BSc (Hons) MTPL MRTPI  
Associate

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

**harrislamb**  
PROPERTY CONSULTANCY

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**From:** Preferred Options Consultation [REDACTED]  
**Sent:** 08 December 2022 16:15  
**To:** Strategic Planning Consultations  
**Subject:** Preferred Options Consultation - Submitted Response

Full name: **John Pearce**

Email: [REDACTED]

### **Agents and Developers**

Organisation or Company: **Harris Lamb**

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? **No reply**

### **Development Strategy and Climate Change**

**Q2** - Do you agree with each of the policies in this chapter?

Policy 1 (Development Strategy): **No**

Comments: **Policy 1 : Development Strategy** The Development Strategy states that 10,007 new homes (535 new homes per year) will be provided over the period 2020 to 2040. The supporting text to the policy at paragraph 1.2 confirms that this figure has been derived using the standard method which identifies a minimum housing requirement of 391 dwellings per annum for the District. The figure has then been adjusted upwards to take account of a “jobs based” housing projection which equates to 435 dwellings per annum. A further allowance of an additional 2,000 homes over the Plan Period is also proposed to help meet the unmet needs of other authorities in the region. The total housing requirement as proposed stands at 535 dwellings per annum. In light of the upward adjustments that the Council have applied to the minimum standard method housing requirement to take account of a jobs based housing projection, we support this intention. We acknowledge that there is a strong link between the provision of housing and the achievement of economic growth and as such the proposal to provide additional housing to achieve these economic growth objectives is wholly supported. Furthermore, the Council are proposing to allocate an additional 2,000 houses to meet the needs of the wider region. Whilst it is not clear from the text in the consultation

document as to which needs these additional dwellings are intended to meet at the current time, we have no in principle objection to the Council proposing to do so. The proposed housing requirement is 10,700 dwellings whilst paragraph 1.7 confirms that land is being made available to accommodate 12,580 dwellings. The additional land represents a 10% buffer over what the minimum requirement. The spatial development strategy seeks to rely on the implementation of large SUEs and the creation of a new settlement. In light of our comments below, which we will refer to about the reliance on the housing coming forward from a proposed new settlement, and how any shortfall in this should be made up through the allocation of alternative smaller and medium sized sites, we contend that the housing requirement should be subject to the application of a larger flexibility allowance than the 10% proposed. We refer you to the recently adopted Wyre Forest Local Plan that was adopted in April 2022, which included a flexibility allowance of 18% on its housing requirement. The spatial development strategy in that Plan included the reliance on a single large SUE to Kidderminster. In that instance, the Inspector thought it prudent to include an 18% allowance to ensure effective delivery of housing over the Plan Period. As the Stafford Local Plan proposes two large SUEs and a new settlement, we contend that the flexibility allowance that should be applied should be even greater, starting at an additional 25% over and above the housing requirement currently proposed. Spatial Strategy The table at the end of Policy 1 sets out the broad spatial distribution of housing across the different settlements in the settlement hierarchy across the District. The majority of housing is to be directed to Stafford town (59%) with 7% going to Stone, 4% to the larger settlements, 6% is windfalls and 1% each to the smaller settlements and the rural areas. The remaining 24% of the housing is to be directed to the new settlement at Meecebrook. The spatial distribution of housing has changed since the adoption of the Borough Plan with the proportion of housing being directed to Stafford town decreasing from 70% down to 59%. Similarly, the proportion directed to Stone has decreased from 10% to 7% whilst development in the larger settlements have decreased from 12% down to 4%. The changes in the proportions directed to the different tiers in the settlement hierarchy have resulted in the need to identify a new settlement in order to make up the difference in the provision of housing. The previous strategy of directing significant growth to Stafford town in proposed SUEs around the boundary has proved relatively effective in that these SUEs are currently delivering significant new housing for the town. However, the current SUEs are still under construction and that as a result there is limited ability to add additional further SUEs around Stafford town until these are completed. Similarly, new development around Stone has reduced the opportunity to deliver even more growth around this settlement at the current time. It has, therefore, been necessary to identify a new settlement in order to find a location to direct significant new growth for the district. Accordingly, a new settlement at Meecebrook is proposed, which would account for 24% of the total housing requirement and over half of the proposed new allocations in the emerging plan. The proposal for a new settlement is at the expense of any significant new housing allocations in the larger settlements save for the 6 draft allocations that are proposed in Gnosall and Woodseaves. The 6 allocations account for 234 dwellings in total. No allocations are proposed in any of the other 11 larger settlements of which Eccleshall is one. We do not support such a strategy for two principal reasons. The first of which is the reliance on a new settlement to accommodate a significant proportion of the District's housing needs and second, restricting development in the larger settlements such as Eccleshall, will, we consider, have an adverse impact on the future growth of these settlements. By limiting new housing development in the larger settlements to windfall development within the development boundary, this will have the effect of restricting new housing, which will adversely impact on the ability of people of working age to live in settlements. This could then lead to a reduction in the demand for services, facilities and infrastructure in the villages which in time will close down if there is not sufficient demand to

maintain them, which would adversely affect existing residents. Meecebrook New Settlement We object in principle to the proposal for a new settlement and consider that housing should first be directed to existing settlements. The identification of SUEs around Stafford and Stone, coupled with housing growth in the larger settlements, such as Eccleshall, has been a relatively successful strategy in terms of delivering new housing. It makes sense, in our view, to direct further development to where there is existing infrastructure rather than seeking to create it from new. Improvements and/or enhancements to existing facilities are easier to deliver than starting from scratch and represent a much more sustainable option. However, if the council consider that the only option is to go down the new settlement route, we have a number of concerns about how deliverable such an option would be. We refer you to the Lichfields report entitled 'Start to Finish' which was first published in November 2016 and subsequently updated in February 2020. The report looked at the evidence underpinning the identification of production of realistic housing trajectories for plan making and decision taking. The report also looked at the evidence on the speed and rate of delivery of large scale housing sites, which looked at 97 sites where over 500 dwellings were proposed. The report considered a wide range of factors that might affect lead in times and build out rates and led to four key conclusions being drawn. These were: 1. Schemes of more than 500 dwellings that have outline planning permission take on average more than 3 years for the first home to be delivered. However, from the date from which an outline application is validated, the average can take between 5 to 8.4 years for the first home to be delivered. 2. The lead in time for large sites to be completed since 2007/08 has jumped. 3. Large sites seem to ramp up delivery beyond year five of the development on sites of 2,000+ units with large scale brownfield sites delivering at a slower rate than their greenfield equivalent. 4. Sites that have additional outlets on site have a positive impact on build out rates whilst those sites that provide 30% affordable housing build out at close to twice the rate at those with lower levels of affordable housing on site. The finding of the Lichfields report indicate that on large sites it can take up to 8.4 years for the completion of the first house to be delivered. Whilst the Lichfield report does not categorically state this will be the case in all circumstances, it does provide a helpful oversight as to the issues facing the delivery of large scale complex developments such as that proposed at Meecebrook. In light of the potential time lag between the submission of an outline planning application, its determination, approval of Reserved Matters, discharge of conditions, completion of any land sale, implementation of any infrastructure and making a material start on site we consider that the 8.4 year timescale set out by Lichfield would be similar to that experienced in seeking to bring forward the Meecebrook proposal. In fact, the timescale could be an underestimate and that there is certainly a possibility that it could be 10 years plus before the first completion is achieved at the new settlement given the need to deal with necessary infrastructure and utilities delivery. There are other examples in the West Midlands region when new settlements have been proposed and adopted within Local Plans such as the proposal at Langley on the north side of Birmingham and the new settlement at Long Marston to the south of Stratford. The Langley example, despite being allocated in a plan adopted over 5 years ago, has yet to receive outline planning permission principally due to the number of landowners within the overall allocation and the inability to reach agreement between all of them on how the site and development shall be equalised. In addition, there ha

Policy 2 (Settlement Hierarchy): No

Comments: We have no objection to the intention to direct growth to Stafford and Stone and we have set out our comments above to the proposed new garden community at Meecebrook in our comments to Policy 1. In light of our suggestion that allocations for small and medium sites should be made in the larger settlements, we do not consider the approach of limiting

development to these sites within settlement boundaries is a sound approach. The reliance on windfall development introduces a degree of uncertainty as to where and how new housing can come forward. As noted above, we consider that new allocations should be identified in the larger settlements, including Eccleshall. Policy 12 only identifies new allocations in 4 settlements, 2 of which are Stone and Stafford towns with a further 6 sites allocated for 100 units in Gnosall and Woodseaves, both of which are larger settlements. The Council consider these two larger settlements are capable of accommodating more growth so why are none of the others?

Policy 3 (Development in open countryside): **No**

Comments: **The policy seeks to restrict those forms of development to those that are considered suitable for a countryside location. We do not fundamentally disagree with controlling development in the countryside, however we do consider that in light of the intention to restrict development in the larger settlements to windfalls within the development boundary, the policy should be more flexible to allow some new housing development on sites that are well related to the urban edge of the settlement and where such development would cause limited harm. Development of such sites could be permitted when there was a 5 year housing land supply shortfall for example, which would enable the Council to address that in a planned way rather than by fending off speculative applications at appeal. The emerging Shropshire Local Plan has a similar policy (Ref: See Policy SP7 of the Pre-Submission Draft Shropshire Local Plan December 2020).**

Policy 4 (Climate change and development requirements): **No**

Comments: **Whilst we welcome the spirit of the policy we do not feel that new development will be able to comply in full with this requirement to demonstrate no on site fossil fuel combustion will be used. Whilst there is a move to achieving that, we do not consider that the housebuilders are actually there yet. As such, if this policy is applied rigidly it could result in limited new development coming forward. We have no issue if the implementation/application of the policy is phased in. The Future Home Standard is moving in this direction so we consider that such an objective will be achievable in due course; just not at the time of adoption of the plan. However, this is a matter that should be controlled by Building Regulations.**

Policy 5 (Green Belt): **No reply**

Comments: **No reply**

Policy 6 (Neighbourhood plans): **No**

Comments: **We note the requirement in Policy 6 for Neighbourhood Plans to be in general accordance with the strategic policies of the Local Plan and contend that where Neighbourhood Plans are in place, these should be updated/re-placed to ensure their consistency.**

## **Meecebrook Garden Community**

**Q3 - Do you agree with proposed new garden community: No**

Comments: **We have set out our views on the suitability of a new settlement as a means to**

delivering new housing in our response to Policy 1 and do not propose to repeat that here. We note the requirement of Part (G) to provide a station on the West Coast Main Line. Whilst this will no doubt provide a range of significant benefits to both the new settlement and wider District, the question of how and who is to deliver this would need to be bottomed out. Notwithstanding the cost of funding the station, delivery of a new station on one of the busiest railway lines in the country is going to present no small challenge to whoever has to deliver it. Whilst entirely feasible the timescales for delivery will need to be fully understood and programmed into the overall delivery of the new settlement. If delivery of new housing is dependent on the construction of the station then the trajectory will need to reflect this. This point is essentially captured in Part L of the policy. Clearly, if the funding mechanism cannot be found to provide the infrastructure this would significantly undermine the delivery of the whole site and a large part of the District's housing requirement with it. As such, we consider it imperative that if the new settlement goes ahead, these matters need to be robustly addressed before the Plan is adopted. This endorses our view that a higher buffer figure should be allowed for as noted above. Finally, we note the requirement to deliver a comprehensive development. We are not party to the landownership details of the site. We do, however, highlight the issues that Birmingham City Council have had in bringing forward a major SUE to the north of the city at Langley which is proposed to deliver 6,000 houses, which has been significantly delayed due to the inability of the promoters to agree an equalisation agreement between the different landowners. This has resulted in the site not coming forward as anticipated and not delivering much needed housing for the City. Without a clear understanding of how the site is to be delivered, if there are multiple landowners, this could delay delivery of new housing and undermine the overall plan strategy.

## Site Allocation Policies

**Q4** - Do you agree with the proposed allocations?

Policy 9 (North of Stafford): **No reply**

Comments: **No reply**

Policy 10 (West of Stafford): **No reply**

Comments: **No reply**

Policy 11 (Stafford Station Gateway): **No reply**

Comments: **No reply**

Policy 12 (Other housing and employment land): **No reply**

Comments: **Our objection to this policy reflects our comments above in two respects. Firstly, we consider that there is a need for a wider range of smaller and medium sized sites to be allocated to provide greater flexibility in the land supply and better enable the Council to deliver its housing needs in the early part of the plan period as the new settlement comes on stream. Secondly, we are concerned about restricting development in the larger settlements to windfall/ redevelopment opportunities within the settlement boundaries as we consider this will adversely affect the growth of these important key sustainable settlements. As such, we are suggesting that additional sites are allocated in the larger settlements including MPG's land interests at Eccleshall. Whilst we have no in principle objection to the sites that are**

identified as draft allocations in Policy 12, our objection focuses on the omission of MPG's sites. These include (site location plans are attached): • Land at Shawls Lane – 80 dwellings • Land South of Cross Butts – 60 dwellings • Land at The Burgage – 54 dwellings These sites have all been submitted to the Call for Sites and are included in the 2022 SHELAA. In light of our two points above as to why additional land should be allocated in Eccleshall, we consider that these three sites should be considered for allocation for residential development. We object to the inclusion of the two sites in the policy (former Staffordshire University Campus and MoD Site 4) which are identified as allocations but where the supporting text at paragraph 12.1 confirms that these are not currently deliverable due to education constraints. If they are not deliverable then they should not be identified as allocations. Please see paragraph 68 of the Framework which confirms that local planning authorities should identify a supply of deliverable sites. The Glossary to the Framework on page 66 sets out what is considered a deliverable site. In light of the fact that both sites need education constraints to be overcome before they can be developed would indicate that they do not meet the definition of being deliverable. As such, they should be deleted from the supply. Paragraph 12.2 states that by allocating sites in a range of places it will help maintain a 5 year supply of housing in the District. Whilst we do not disagree with the objective we do not agree that the plan strategy will achieve this as it seeks to limit new allocations to four settlements and the creation of a large new settlement. We do not agree that this would achieve the objective of maintaining a 5 year land supply and that in order to do so, other smaller and medium sized sites should be allocated as well.

### 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**

Comments: **We consider that the policy as drafted will severely restrict the delivery of affordable housing. Using Eccleshall as an example, the Plan currently makes no allocations in the settlement. As such, any new housing development will come forward as windfall development through redevelopment of previously developed sites in the development boundary. As affordable housing these are not sought on sites of less than 10 units, the prospect of getting a windfall development in Eccleshall of more than 10 units coming forward is slim. As such no affordable housing will come forward from such sites. Similarly, as there are no greenfield opportunities for redevelopment within Eccleshall either, no such schemes will come forward and no affordable housing will be delivered as a result. The net result is no new affordable housing will be delivered in Eccleshall over the plan period through redevelopment and any affordable housing would need to be delivered on exception sites. We contend that the only way to ensure delivery of some affordable housing in Eccleshall would be to allocate sites specifically for development and require a policy compliant level of provision of affordable housing to be met on these. Restricting the delivery of affordable housing in the larger settlements will mean that the housing needs continue to go unmet and those in need will be faced with ever increasing affordability issues when looking to buy a home. This is not a sustainable or sound approach.**

**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**

Comments: **Policy 24 We note the requirement in the policy for new development to achieve National Described Space Standards (NDSS). The Framework and Planning Practice Guidance (PPG) are clear in what Councils need to do when seeking to include a policy on NDSS in the Local Plan. The PPG requires local authorities to demonstrate that there is evidence of need for new housing to be NDSS compliant and that this needs to be established at the time of preparing a Local Plan. We question whether such evidence of need has been provided, and if not, we request that it is submitted as part of the evidence base as the plan progresses. Clearly if there is no evidence of need for new housing to be NDSS compliant then there is no need for a requirement in the policy. Policy 31 MPG do not disagree with the need to provide a mix of housing or that in Tier 4 and 5 settlements, the Council will support the delivery of one and two bedroom properties. We note again that the best way to achieve a specific form of development would be to allocate sites rather than rely on windfalls coming forward. Windfalls by their very nature come forward on an ad hoc basis. If the objective is to deliver one and two bedroom units in the larger settlements then allocating sites and specifying a preferred mix on these sites would result in this objective being met.**

## Design and Infrastructure Policies

**Q11** - Do you agree with policies? **No**

Comments: **Policy 34 In order to accord with Part 1 of the policy it assumes that the various**

design guidance would be in place at the time an application was being considered. Clearly if not, then it would be difficult to be in compliance with these documents. Development proposals which are acceptable should not be held up in the absence of such guidance. Policy 35 MPG consider that the policy as drafted is far too prescriptive and in part seeks to impart the Council's preferred design rationale for new development. Policy 37 We consider that the preparation of the Local Plan provides an important opportunity to identify any deficiencies in infrastructure and where these exist the identification of further development in these locations would be one potential route to remedy any deficiencies.

## 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:

**Policy 41** We consider that the policy should be revised to reflect the guidance in the Framework covering heritage matters. In our view Part C goes beyond the considerations in the Framework and is overly restrictive. We trust you will take our comments into consideration and welcome the opportunity to comment further on the next stage of the plan. Should you have any questions or queries about the above please do not hesitate to contact me.

Our Ref: P1724/JP/hr  
Date: 8<sup>th</sup> December 2022

Strategic Planning and Placemaking  
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Dear Sir/Madam

### **Stafford Borough Local Plan 2020 to 2040 : Preferred Options Consultation Response by Muller Property Group**

We are instructed by Muller Property (“MPG”) to submit representations to the Stafford Borough Local Plan 2020 to 2040 Preferred Options Consultation and welcome the opportunity to do so at this time. We have previously submitted comments to the Issues and Options Consultation in 2020 and remain committed to engaging with the Plan making process. MPG are promoting three sites for residential development in Eccleshall and are seeking their allocation in the Plan for development. Our comments should be read with this objective in mind.

### **Vision and Objectives**

MPG generally support the vision and objectives that had been identified, specifically objective 4 that seeks to deliver sustainable economic and housing growth to provide homes and jobs.

### **Policy 1 : Development Strategy**

The Development Strategy states that 10,007 new homes (535 new homes per year) will be provided over the period 2020 to 2040. The supporting text to the policy at paragraph 1.2 confirms that this figure has been derived using the standard method which identifies a minimum housing requirement of 391 dwellings per annum for the District. The figure has then been adjusted upwards to take account of a “jobs based” housing projection which equates to 435 dwellings per annum. A further allowance of an additional 2,000 homes over the Plan Period is also proposed to help meet the unmet needs of other authorities in the region. The total housing requirement as proposed stands at 535 dwellings per annum.



In light of the upward adjustments that the Council have applied to the minimum standard method housing requirement to take account of a jobs based housing projection, we support this intention. We acknowledge that there is a strong link between the provision of housing and the achievement of economic growth and as such the proposal to provide additional housing to achieve these economic growth objectives is wholly supported. Furthermore, the Council are proposing to allocate an additional 2,000 houses to meet the needs of the wider region. Whilst it is not clear from the text in the consultation document as to which needs these additional dwellings are intended to meet at the current time, we have no in principle objection to the Council proposing to do so.

The proposed housing requirement is 10,700 dwellings whilst paragraph 1.7 confirms that land is being made available to accommodate 12,580 dwellings. The additional land represents a 10% buffer over what the minimum requirement. The spatial development strategy seeks to rely on the implementation of large SUEs and the creation of a new settlement. In light of our comments below, which we will refer to about the reliance on the housing coming forward from a proposed new settlement, and how any shortfall in this should be made up through the allocation of alternative smaller and medium sized sites, we contend that the housing requirement should be subject to the application of a larger flexibility allowance than the 10% proposed.

We refer you to the recently adopted Wyre Forest Local Plan that was adopted in April 2022, which included a flexibility allowance of 18% on its housing requirement. The spatial development strategy in that Plan included the reliance on a single large SUE to Kidderminster. In that instance, the Inspector thought it prudent to include an 18% allowance to ensure effective delivery of housing over the Plan Period. As the Stafford Local Plan proposes two large SUEs and a new settlement, we contend that the flexibility allowance that should be applied should be even greater, starting at an additional 25% over and above the housing requirement currently proposed.

### *Spatial Strategy*

The table at the end of Policy 1 sets out the broad spatial distribution of housing across the different settlements in the settlement hierarchy across the District. The majority of housing is to be directed to Stafford town (59%) with 7% going to Stone, 4% to the larger settlements, 6% is windfalls and 1% each to the smaller settlements and the rural areas. The remaining 24% of the housing is to be directed to the new settlement at Meecebrook. The spatial distribution of housing has changed since the adoption of the Borough Plan with the proportion of housing being directed to Stafford town decreasing from 70% down to 59%. Similarly, the proportion directed to Stone has decreased from 10% to 7% whilst development in the larger settlements have decreased from 12% down to 4%. The changes in the proportions directed to the different tiers in the settlement hierarchy have resulted in the need to identify a new settlement in order to make up the difference in the provision of housing.

The previous strategy of directing significant growth to Stafford town in proposed SUEs around the boundary has proved relatively effective in that these SUEs are currently delivering significant new housing for the town. However, the current SUEs are still under construction and that as a result there is limited ability to add additional further SUEs around Stafford town until these are completed. Similarly, new development around Stone has reduced the opportunity to deliver even more growth around this settlement at the current time. It has, therefore, been necessary to identify a new settlement in order to find a location to direct significant new growth for the district. Accordingly, a new settlement at Meecebrook is proposed, which would account for 24% of the total housing requirement and over half of the proposed new allocations in the emerging plan.

The proposal for a new settlement is at the expense of any significant new housing allocations in the larger settlements save for the 6 draft allocations that are proposed in Gnosall and Woodseaves. The 6 allocations account for 234 dwellings in total. No allocations are proposed in any of the other 11 larger settlements of which Eccleshall is one.

We do not support such a strategy for two principal reasons. The first of which is the reliance on a new settlement to accommodate a significant proportion of the District's housing needs and second, restricting development in the larger settlements such as Eccleshall, will, we consider, have an adverse impact on the future growth of these settlements. By limiting new housing development in the larger settlements to windfall development within the development boundary, this will have the effect of restricting new housing, which will adversely impact on the ability of people of working age to live in settlements. This could then lead to a reduction in the demand for services, facilities and infrastructure in the villages which in time will close down if there is not sufficient demand to maintain them, which would adversely affect existing residents.

### **Meecebrook New Settlement**

We object in principle to the proposal for a new settlement and consider that housing should first be directed to existing settlements. The identification of SUEs around Stafford and Stone, coupled with housing growth in the larger settlements, such as Eccleshall, has been a relatively successful strategy in terms of delivering new housing. It makes sense, in our view, to direct further development to where there is existing infrastructure rather than seeking to create it from new. Improvements and/or enhancements to existing facilities are easier to deliver than starting from scratch and represent a much more sustainable option.

However, if the council consider that the only option is to go down the new settlement route, we have a number of concerns about how deliverable such an option would be.

We refer you to the Lichfields report entitled 'Start to Finish' which was first published in November 2016 and subsequently updated in February 2020. The report looked at the evidence underpinning the identification of production of realistic housing trajectories for plan making and decision taking. The report also looked at the evidence on the speed and rate of delivery of large scale housing sites, which looked at 97 sites where over 500 dwellings were proposed. The report considered a wide range of factors that might affect lead in times and build out rates and led to four key conclusions being drawn. These were:

1. Schemes of more than 500 dwellings that have outline planning permission take on average more than 3 years for the first home to be delivered. However, from the date from which an outline application is validated, the average can take between 5 to 8.4 years for the first home to be delivered.
2. The lead in time for large sites to be completed since 2007/08 has jumped.
3. Large sites seem to ramp up delivery beyond year five of the development on sites of 2,000+ units with large scale brownfield sites delivering at a slower rate than their greenfield equivalent.
4. Sites that have additional outlets on site have a positive impact on build out rates whilst those sites that provide 30% affordable housing build out at close to twice the rate at those with lower levels of affordable housing on site.

The finding of the Lichfields report indicate that on large sites it can take up to 8.4 years for the completion of the first house to be delivered. Whilst the Lichfield report does not categorically state this will be the case in all circumstances, it does provide a helpful oversight as to the issues facing the delivery of large scale complex developments such as that proposed at Meecebrook. In light of the potential time lag between the submission of an outline planning application, its determination, approval of Reserved Matters, discharge of conditions, completion of any land sale, implementation of any infrastructure and making a material start on site we consider that the 8.4 year timescale set out by Lichfield would be similar to that experienced in seeking to bring forward the Meecebrook proposal. In fact, the timescale could be an underestimate and that there is certainly a possibility that it could be 10 years plus before the first completion is achieved at the new settlement given the need to deal with necessary infrastructure and utilities delivery.

There are other examples in the West Midlands region when new settlements have been proposed and adopted within Local Plans such as the proposal at Langley on the north side of Birmingham and the new settlement at Long Marston to the south of Stratford. The Langley example, despite being allocated in a plan adopted over 5 years ago, has yet to receive outline planning permission principally due to the number of landowners within the overall allocation and the inability to reach agreement between all of them on how the site and development shall be equalised. In addition, there has been no agreement on the provision of infrastructure nor has a comprehensive masterplan been agreed for the whole site. In the case of Long Marston, whilst a modicum of development has been permitted, the new settlement is dependent on the delivery of a southern bypass around Stratford, the funding of which has yet to be fully secured and is yet to be implemented. Both examples demonstrate the inherent difficulties in planning for major new SUEs or new settlements and the implications for the timing of delivery of units.

Whilst each site is different, the matters referred to above in the two examples cited are potential matters that could affect the delivery of the new settlement. In light of the potential for delay for the new settlement to start delivering we note that the trajectory set out in Appendix 6 of the Preferred Options Consultation document claims that Meecebrook will deliver 300 dwellings per annum from the year 2030/31 onwards and for the remaining 9 years of the plan leading up to 2040. We do not consider this to be realistic.

Delivering 300 dwellings per annum would require at least 4 or 5 different outlets on the site. Has it been established that the site can be divided up in such a way to accommodate 4 or 5 different housebuilders at the same time and has evidence been provided that demonstrates that the housing market is sufficiently robust in this area in order that 300 dwellings a year can be built and sold for an ongoing period of 10 years. Further evidence of the deliverability of the site is required because as it stands we are unconvinced that the proposal is deliverable in its current form.

Using the 8 year timeframe as described in the Lichfields report for achieving first completions even if an application were submitted tomorrow, one would potentially be looking at the first completions in in early 2031. An outline application for the new settlement is unlikely to be submitted until such time as the Plan is either much more well advanced or even adopted. This could potentially be 2024 or 2025. Applying the 8 year timeframe to these dates could result in the first completions in either 2032 or 2033. Should it take longer, the first completions will only start coming through towards the end of the Plan Period and would fall well short of the 3,000 that are anticipated from the site.

If the new settlement does not start delivering as expected there is going to be a shortfall in delivery of new housing across the District. This could expose the Council to a 5 year housing

land supply shortfall and the prospect of having to address and deal with speculative planning applications submitted on behalf of developers seeking to take advantage of the situation. If a new settlement is proposed we would recommend that in order to smooth over the supply of new homes that the Council should seek to identify a number of additional allocations of small and medium sized sites elsewhere in the District. The advantage that these sites will have is that they would not be heavily dependent on the provision of new infrastructure and could therefore come forward relatively quickly in the intervening period whilst the new settlement comes on stream.

Paragraph 69 of the Framework advocates such an approach, noting that they can often be built out quickly, and we commend this to the Council as a way of ensuring continuity of supply of housing in the early part of the Plan Period. The provision of these additional houses dovetails with the comments above in relation to the application of a flexibility allowance in order to ensure delivery of the council's annual housing requirements. Sustainable locations such as in and around the larger settlements would be ideal locations to direct small and medium sized allocations as they could plug into existing infrastructure relatively easily and enable early delivery of new housing whilst the new settlement gathers traction and comes on stream.

### **Restraining Growth of the Larger Settlements**

By not allocating any sites in the larger settlements, with the exception of Gnosall and Woodseaves, we consider that this will have an adverse impact on their continued role and function in the Borough. Furthermore, if new housing is not directed to these settlements, it would effectively restrict the size of the working age population that would be looking to live in these locations. The settlements will be left with an ageing population that will in turn place greater demands on specific services such as health care for example whilst reducing demand for others i.e. primary school places. The change in demographic may result in certain services becoming oversubscribed whilst demand for others decreases, potentially leading to them shutting or closing for good. Such settlements need more development to help sustain shops and facilities and ensure key services continue to remain open. We, therefore, consider that restricting growth in the larger settlements is not a sound approach and would have a number of detrimental impacts on these settlements.

Whilst we are not seeking to direct significant levels of new housing to the larger settlements over and above the proportions in the adopted Borough Plan, we contend that a continuation of the previous proportions would be a useful starting point.

We note that Paragraph 1.3 states that 2,000 homes are proposed to meet the unmet needs of other authorities in the region. However, paragraph 1.4 then goes on to say that Meecebrook is identified to deliver 3,000 homes in the Plan Period (which we question whether this will be achieved anyway) but then states that if these numbers are not met within the Plan Period any contribution to meeting the wider unmet needs of the region will not in fact be met. Our interpretation of this point is that the 2,000 homes that have been identified to meet the wider housing needs will only be made available once the needs of Stafford have been met. As such, there is a question mark over whether the 2,000 homes genuinely form part of the requirement and whether sufficient land is made available for them.

Part E of the policy states that the development strategy will be reviewed within 5 years of adoption in accordance with National Policy. As this is supposed to happen anyway, why is there a need to state this in the policy? However, paragraph 1.21 then states that the 5 year review will consider the need to adjust the development strategy based on market signals for delivering growth, new jobs and economic activity. Again, our interpretation of this is that if

the Council are achieving these objectives satisfactorily then there would be no need to review the strategy. This, we consider, would be contrary to National Policy which require plans to be updated every 5 years. Clearly if the strategy is working there would be no reason to amend it but a review would provide the opportunity to reassess any outstanding allocations and confirm their continued suitability and to make new or additional allocations if the need arose.

### **Policy 2 : Settlement Hierarchy**

We have no objection to the intention to direct growth to Stafford and Stone and we have set out our comments above to the proposed new garden community at Meecebrook in our comments to Policy 1. In light of our suggestion that allocations for small and medium sites should be made in the larger settlements, we do not consider the approach of limiting development to these sites within settlement boundaries is a sound approach. The reliance on windfall development introduces a degree of uncertainty as to where and how new housing can come forward. As noted above, we consider that new allocations should be identified in the larger settlements, including Eccleshall. Policy 12 only identifies new allocations in 4 settlements, 2 of which are Stone and Stafford towns with a further 6 sites allocated for 100 units in Gnosall and Woodseaves, both of which are larger settlements. The Council consider these two larger settlements are capable of accommodating more growth so why are none of the others?

### **Policy 3 : Development in the Open Countryside**

The policy seeks to restrict those forms of development to those that are considered suitable for a countryside location. We do not fundamentally disagree with controlling development in the countryside, however we do consider that in light of the intention to restrict development in the larger settlements to windfalls within the development boundary, the policy should be more flexible to allow some new housing development on sites that are well related to the urban edge of the settlement and where such development would cause limited harm. Development of such sites could be permitted when there was a 5 year housing land supply shortfall for example, which would enable the Council to address that in a planned way rather than by fending off speculative applications at appeal. The emerging Shropshire Local Plan has a similar policy (Ref: See Policy SP7 of the Pre-Submission Draft Shropshire Local Plan December 2020).

### **Policy 4**

Whilst we welcome the spirit of the policy we do not feel that new development will be able to comply in full with this requirement to demonstrate no on site fossil fuel combustion will be used. Whilst there is a move to achieving that, we do not consider that the housebuilders are actually there yet. As such, if this policy is applied rigidly it could result in limited new development coming forward.

We have no issue if the implementation/application of the policy is phased in. The Future Home Standard is moving in this direction so we consider that such an objective will be achievable in due course; just not at the time of adoption of the plan. However, this is a matter that should be controlled by Building Regulations.

### **Policy 6**



We note the requirement in Policy 6 for Neighbourhood Plans to be in general accordance with the strategic policies of the Local Plan and contend that where Neighbourhood Plans are in place, these should be updated/re-placed to ensure their consistency.

### **Policy 7**

We have set out our views on the suitability of a new settlement as a means to delivering new housing in our response to Policy 1 and do not propose to repeat that here.

We note the requirement of Part (G) to provide a station on the West Coast Main Line. Whilst this will no doubt provide a range of significant benefits to both the new settlement and wider District, the question of how and who is to deliver this would need to be bottomed out. Notwithstanding the cost of funding the station, delivery of a new station on one of the busiest railway lines in the country is going to present no small challenge to whoever has to deliver it. Whilst entirely feasible the timescales for delivery will need to be fully understood and programmed into the overall delivery of the new settlement. If delivery of new housing is dependent on the construction of the station then the trajectory will need to reflect this. This point is essentially captured in Part L of the policy. Clearly, if the funding mechanism cannot be found to provide the infrastructure this would significantly undermine the delivery of the whole site and a large part of the District's housing requirement with it. As such, we consider it imperative that if the new settlement goes ahead, these matters need to be robustly addressed before the Plan is adopted. This endorses our view that a higher buffer figure should be allowed for as noted above.

Finally, we note the requirement to deliver a comprehensive development. We are not party to the landownership details of the site. We do, however, highlight the issues that Birmingham City Council have had in bringing forward a major SUE to the north of the city at Langley which is proposed to deliver 6,000 houses, which has been significantly delayed due to the inability of the promoters to agree an equalisation agreement between the different landowners. This has resulted in the site not coming forward as anticipated and not delivering much needed housing for the City. Without a clear understanding of how the site is to be delivered, if there are multiple landowners, this could delay delivery of new housing and undermine the overall plan strategy.

### **Policy 12**

Our objection to this policy reflects our comments above in two respects. Firstly, we consider that there is a need for a wider range of smaller and medium sized sites to be allocated to provide greater flexibility in the land supply and better enable the Council to deliver its housing needs in the early part of the plan period as the new settlement comes on stream. Secondly, we are concerned about restricting development in the larger settlements to windfall/redevelopment opportunities within the settlement boundaries as we consider this will adversely affect the growth of these important key sustainable settlements. As such, we are suggesting that additional sites are allocated in the larger settlements including MPG's land interests at Eccleshall. Whilst we have no in principle objection to the sites that are identified as draft allocations in Policy 12, our objection focuses on the omission of MPG's sites. These include (site location plans are attached):

- Land at Shawls Lane – 80 dwellings
- Land South of Cross Butts – 60 dwellings
- Land at The Burgage – 54 dwellings

These sites have all been submitted to the Call for Sites and are included in the 2022 SHELAA. In light of our two points above as to why additional land should be allocated in Eccleshall, we consider that these three sites should be considered for allocation for residential development.

We object to the inclusion of the two sites in the policy (former Staffordshire University Campus and MoD Site 4) which are identified as allocations but where the supporting text at paragraph 12.1 confirms that these are not currently deliverable due to education constraints. If they are not deliverable then they should not be identified as allocations. Please see paragraph 68 of the Framework which confirms that local planning authorities should identify a supply of deliverable sites. The Glossary to the Framework on page 66 sets out what is considered a deliverable site. In light of the fact that both sites need education constraints to be overcome before they can be developed would indicate that they do not meet the definition of being deliverable. As such, they should be deleted from the supply.

Paragraph 12.2 states that by allocating sites in a range of places it will help maintain a 5 year supply of housing in the District. Whilst we do not disagree with the objective we do not agree that the plan strategy will achieve this as it seeks to limit new allocations to four settlements and the creation of a large new settlement. We do not agree that this would achieve the objective of maintaining a 5 year land supply and that in order to do so, other smaller and medium sized sites should be allocated as well.

### **Policy 23**

We consider that the policy as drafted will severely restrict the delivery of affordable housing. Using Eccleshall as an example, the Plan currently makes no allocations in the settlement. As such, any new housing development will come forward as windfall development through redevelopment of previously developed sites in the development boundary. As affordable housing these are not sought on sites of less than 10 units, the prospect of getting a windfall development in Eccleshall of more than 10 units coming forward is slim. As such no affordable housing will come forward from such sites. Similarly, as there are no greenfield opportunities for redevelopment within Eccleshall either, no such schemes will come forward and no affordable housing will be delivered as a result. The net result is no new affordable housing will be delivered in Eccleshall over the plan period through redevelopment and any affordable housing would need to be delivered on exception sites.

We contend that the only way to ensure delivery of some affordable housing in Eccleshall would be to allocate sites specifically for development and require a policy compliant level of provision of affordable housing to be met on these.

Restricting the delivery of affordable housing in the larger settlements will mean that the housing needs continue to go unmet and those in need will be faced with ever increasing affordability issues when looking to buy a home. This is not a sustainable or sound approach.

### **Policy 24**

We note the requirement in the policy for new development to achieve National Described Space Standards (NDSS). The Framework and Planning Practice Guidance (PPG) are clear in what Councils need to do when seeking to include a policy on NDSS in the Local Plan. The PPG requires local authorities to demonstrate that there is evidence of need for new housing to be NDSS compliant and that this needs to be established at the time of preparing a Local Plan. We question whether such evidence of need has been provided, and if not, we request that it is submitted as part of the evidence base as the plan progresses. Clearly if there is no

evidence of need for new housing to be NDSS compliant then there is no need for a requirement in the policy.

### **Policy 31**

MPG do not disagree with the need to provide a mix of housing or that in Tier 4 and 5 settlements, the Council will support the delivery of one and two bedroom properties. We note again that the best way to achieve a specific form of development would be to allocate sites rather than rely on windfalls coming forward. Windfalls by their very nature come forward on an ad hoc basis. If the objective is to deliver one and two bedroom units in the larger settlements then allocating sites and specifying a preferred mix on these sites would result in this objective being met.

### **Policy 34**

In order to accord with Part 1 of the policy it assumes that the various design guidance would be in place at the time an application was being considered. Clearly if not, then it would be difficult to be in compliance with these documents. Development proposals which are acceptable should not be held up in the absence of such guidance.

### **Policy 35**

MPG consider that the policy as drafted is far too prescriptive and in part seeks to impart the Council's preferred design rationale for new development.

### **Policy 37**

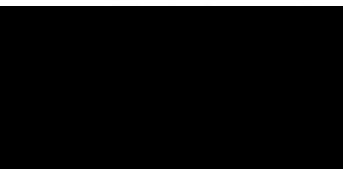
We consider that the preparation of the Local Plan provides an important opportunity to identify any deficiencies in infrastructure and where these exist the identification of further development in these locations would be one potential route to remedy any deficiencies.

### **Policy 41**

We consider that the policy should be revised to reflect the guidance in the Framework covering heritage matters. In our view Part C goes beyond the considerations in the Framework and is overly restrictive.

We trust you will take our comments into consideration and welcome the opportunity to comment further on the next stage of the plan. Should you have any questions or queries about the above please do not hesitate to contact me.

Yours faithfully



**John Pearce BSc (Hons) MTPL MRTPI  
Associate**







created on **edo**zo

Plotted Scale - 1:2,500



created on **edozo**

Plotted Scale - 1:2,500

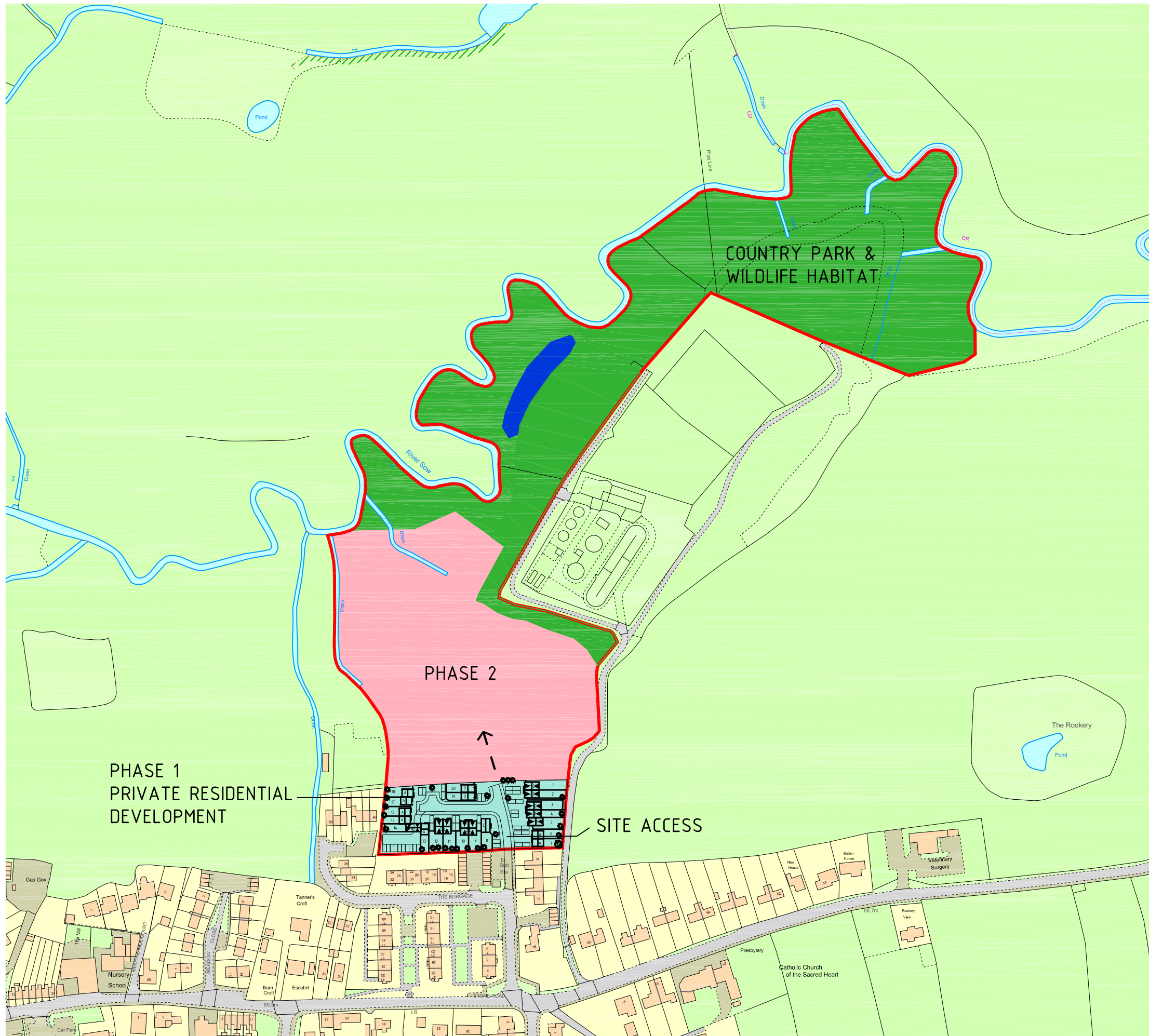
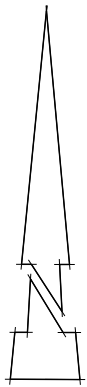
revisions	---
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Site area (edge red)  
= 6.3685 Ha (15.73 Acres approx.)

Phase 1 Private Residential  
Development Zone  
= 0.5102 Ha (1.26 Acres approx.)

Phase 2  
= 2.0526 Ha (5.07 Acres approx.)

Country Park & Wildlife Habitat  
= 3.8057 Ha (9.40 Acres approx.)



job no	419
dwg no	SK12
revision	-

site name The Burgage, Eccleshall

dwg title Sketch Site Layout

scale	1:2500@a3
date	29/11/16
drawn by	dc

**darrencurry**  
architects  
www.darrencurryarchitects.co.uk

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**From:** [REDACTED]  
**Sent:** 12 December 2022 08:21  
**To:** [REDACTED] Strategic Planning Consultations  
**Subject:** RE: Meecebrook Garden Community

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**From:** [REDACTED]  
**Sent:** 09 December 2022 16:26  
**To:** [REDACTED]  
**Subject:** Meecebrook Garden Community

Dear [REDACTED]

My name is Mr Roger Harris and I am the owner of Brookside Business Park which is in the proposed development site of the Garden Community at Meecebrook. Therefore, in response to your letter dated 21 October 2022, I have studied the plan as it stands to date which fundamentally has only shown the outline of the proposed area and not much detail with regard to the infrastructure required to facilitate such a development.

It is, in my opinion, high time a new development area such as this is brought into being as we cannot continue to expand areas such as Eccleshall and Stone without something major taking place. However, I think the area is highly suitable giving its history with regard to the Ministry of Defence but going forward what is absolutely essential is that the planned area is backed up showing proposed new infrastructure such as road and rail links, motorway connection and bypass of Eccleshall etc etc.

This I understand is the next stage of the proposed development but as it stands it is a bit of a chicken and egg situation. So to conclude, I think the plan is a good proposal but we desperately need infrastructure plans in place.

Please feel free to contact me anytime by email or on my mobile phone number [REDACTED]

I very much look forward to further communications regarding the plan for the garden community.

Regards  
Roger Harris  
Proprietor of Brookside Business Park.

J R Harris Estates  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
  
[REDACTED]  
[REDACTED]

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**From:** Michael Eld  
**Sent:** 11 December 2022 13:37  
**To:** Strategic Planning  
**Cc:**  
**Subject:** Harrowby Estates - Local Plan Submissions  
**Attachments:** Sandon Village Proposed Envelope.pdf; Gayton Proposed Village Envelope.pdf

Good afternoon

We have submitted our response to the Preferred Options document for the Local Plan.

As per our submission, please find attached to this email a suggested map for inclusion of Sandon and Gayton as a Tier 5 villages. This map includes both the existing residential assets as well as the existing leisure facilities (IE non-agricultural use).

I would be grateful if you could annex this as part of our responses to your consultation accordingly.

We feel very strongly that these villages should have been allocated at Tier 5 Villages due to their size, location, and facilities contained therein.

Additionally please could you provide me with an email copy of our responses so I may file for our records as the survey system did not have an ability for me to print the document prior to submission.

With best regards

Michael Eld

---

**From:** Preferred Options Consultation [REDACTED]  
**Sent:** 11 December 2022 13:02  
**To:** Strategic Planning Consultations  
**Subject:** Preferred Options Consultation - Submitted Response

Full name: **Michael Eld**

Email: [REDACTED]

### **Statutory Bodies and Stakeholders**

Organisation or Company: **Harrowby Estates**

Age: [REDACTED]

Added to database: [REDACTED]

Topics (Contents page): **Vision and Objectives**

### **Vision and Objectives**

**Q1 - Which 3 are most important to you? Contribute to Stafford Borough being net zero carbon by ensuring that development mitigates and adapts to climate change and is future proof., To deliver sustainable economic and housing growth to provide income and jobs. and 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.**

### **Development Strategy and Climate Change**

**Q2 - Do you agree with each of the policies in this chapter?**

Policy 1 (Development Strategy): **Yes**

**Comments: We broadly agree with the content of the policy though we have concerns regarding the lack of employment land being allocated for small businesses within the rural communities and feel that the all rural communities (regardless of TIER status) should have the ability to allow modest development of Rural businesses where the settlements number more than 50 people.**

Policy 2 (Settlement Hierarchy): **No**

**Comments: Though we agree with the hierarchy structure, we make the following comments. 1) We agree with the allocation of the Tier 1-4 Settlements. 2) With regard to tier 5 2a) We are unsure as to the allocation criteria for Tier 5 Settlements. 2b) Looking at population sizes and services available we are of the view that Sandon and Gayton Villages should be allocated as Tier 5 Settlements. We have produced maps showing our views on where the settlement boundaries should be placed and will forward these by separate**

cover for annexation to our response to this consultation. 2c) We are of the view that the Tier 5 boundaries are too tight to the existing housing stock and do not contain any realistic prospects of delivering the numbers of houses required under policy 1. 2d) We are of the view that several of the Tier 5 boundary maps have not included existing public amenity facilities (IE existing non-agricultural sites) within the proposed settlement boundaries and as such do not reflect the communities correctly. Example maps will be sent by separate cover and should be annexed to our response to this consultation. 3) We are of the view that the Tier 5 Settlements should contain a provision for employment within the rural communities to assist their sustainability. The absence of this facility will hamper the development of the rural economy.

Policy 3 (Development in open countryside): **No**

Comments: **We support the general policy but** 1) **Feel strongly that an exception should be made for rural employment sites for service industries adjacent to existing settlements and not just being permitted (policy 18) in the re-use of existing redundant buildings.** 2) **Have concerns that item A6 (linked to policy 40) makes no mention of Hydrogen generation.**

Policy 4 (Climate change and development requirements): **No**

Comments: **1) Assuming that the use of HVO for domestic properties is approved (currently under trial) it should be explicitly listed as a permitted fuel in rural areas.** 2) **We support the requirement that on site renewable generation (domestic) is equivalent to at least the on site energy demand.** 3) **We support the non domestic renewable generation requirements but query as to how they can be delivered reliably off site with the National Grid Network strength issues.**

Policy 5 (Green Belt): **Yes**

Comments: **No reply**

Policy 6 (Neighbourhood plans): **Yes**

Comments: **No reply**

## **Meecebrook Garden Community**

**Q3 - Do you agree with proposed new garden community: Yes**

Comments: **We agree with the concept - however we have concerns about the ability for the Local Authority to deliver the development. In the event that the Garden Community cannot be delivered then the housing allocation should be distributed between the Tier 4 and Tier 5 settlements with additional settlements added to the Tier 5 categories to allow for organic growth of smaller communities.**

## **Site Allocation Policies**

**Q4 - Do you agree with the proposed allocations?**

Policy 9 (North of Stafford): **Yes**

Comments: **No reply**

Policy 10 (West of Stafford): **Yes**

Comments: **No reply**

Policy 11 (Stafford Station Gateway): **Yes**

Comments: **No reply**

Policy 12 (Other housing and employment land): **Yes**

Comments: **We support policy 12b but note that we feel that the allocation of land at Ladfordfields should be expanded further to the East for the following reasons :- 1) Stormwater runoff requires access to the Millian Brook (located beyond the site). 2) Creation of a retention pond will significantly reduce the available area. 3) BNG requirement (onsite) will reduce the employment land available. 4) Expansion to the East by one field will introduce an additional access into the site (land known as the Far Barns) which will ease the pressure on the main access point to the Ladfordfields Industrial Estate.**

### Site Allocation Policies (continued)

**Q5** - Do you agree with the proposed allocations?

Policy 13 (Local Green Space): **Yes**

Comments: **No reply**

Policy 14 (Penk and Sow): **Yes**

Comments: **No reply**

Policy 15 (Stone Countryside): **Yes**

Comments: **No reply**

### Economy Policies

**Q6** - The local plan seeks to protect previously allocated and designated industrial land and support home working and small-scale employment uses. Do you agree: **No**

Comments: Policy 17 - No issues. Policy 18 - Item C should allow for development in rural areas adjacent to all existing settlements for new buildings to support the expansion of existing rural businesses or to allow existing businesses to relocate into the area.

**Q7** - The Stafford Borough Plan proposes policies around the town centres uses, agriculture and forestry development, tourism development and canals. Do you agree? **Yes**

Comments: **No reply**

### Housing Policies

**Q8** - The local plan proposed a policy (23) on affordable housing. Do you agree? **Yes**

Comments: **We broadly agree with the proposals but make the following comments. Section A1 - Sandon & Burston / Gayton are listed in this section - however**

the villages have not been allocated as Tier 5 (or 4) settlements. We have previously made representations that Sandon, Burston and Gayton should be allocated as Tier 5 settlements. Section A2 - Seighford is listed in this section but the settlement boundary is so tight to the village that this policy has no scope to produce any dwellings. The village of Great Bridgeford (Tier 5) is not listed despite having a Tier 5 boundary. Though we feel the boundary at Great Bridgeford is too tight to allow for affordable dwellings to be produced, the policy would seem to indicate that no affordable housing would be required in Great Bridgeford. Section F - We are of the view that due to the contraction of the private rental sector, the social rented housing percentage should be 75 % of any development with 20% first homes and 5% shared ownership. It is essential that any affordable housing in rural areas is prioritised to existing members of the community and their families / dependants.

**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: **We have no objections to the proposed sites - though the Weston site is far from amenities. We are of the view that there should be traveller pitches incorporated in the new Meecebrook development.**

**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: **We agree with most of the policies but comment that Policy 33 should specifically include reference to extending the curtilage of a dwelling where a class Q (permitted development) application has been made.**

## **Design and Infrastructure Policies**

**Q11** - Do you agree with policies? **No**

Comments: **Policy 40 :- 1) Section A - one of the allocated areas for renewable generation includes the Upper Park at Sandon Hall. This is a listed Parkland and therefore the proposed allocation for a Solar scheme is undeliverable and would contravene policy 41.4 in your own document. 2) No mention of schemes to generate Hydrogen is made in the policy and we regard this as shortsighted. 3) Policy D should define local community backing as to being a majority of the local community and a definition of relevant radius of the site - we would suggest that this is 0.5km - 1km maximum.**

## **Environment Policies**

**Q12** - Do you agree with policies? **No**

Comments: **Policy 45 should not only refer to Cannock Chase but also to Aqualate Mere. Additionally funding through the planning process (that is currently directed solely to Cannock Chase) should also be directed to funding the National Nature reserve, RAMSAR site and Nature reserve at the Mere. Policy 46 should allow for contributions from the planning system to encourage Landowners and Farmers to maintain and upgrade bridleway gate and styles across the network in the Borough. Policy 47 is supported but it is noted that the Borough will need to work with Local Landowners and Farmers to achieve this goal. Off site habitat creation / restoration should be prioritised over on-site where possible as it will allow poorer quality, less productive agricultural land to be repurposed.**

## **Connections**

**Q13** - Do you agree with policies? **Yes**

Comments: **No reply**

### **Evidence Base**

**Q14** - Have we considered all relevant studies and reports? **Yes**

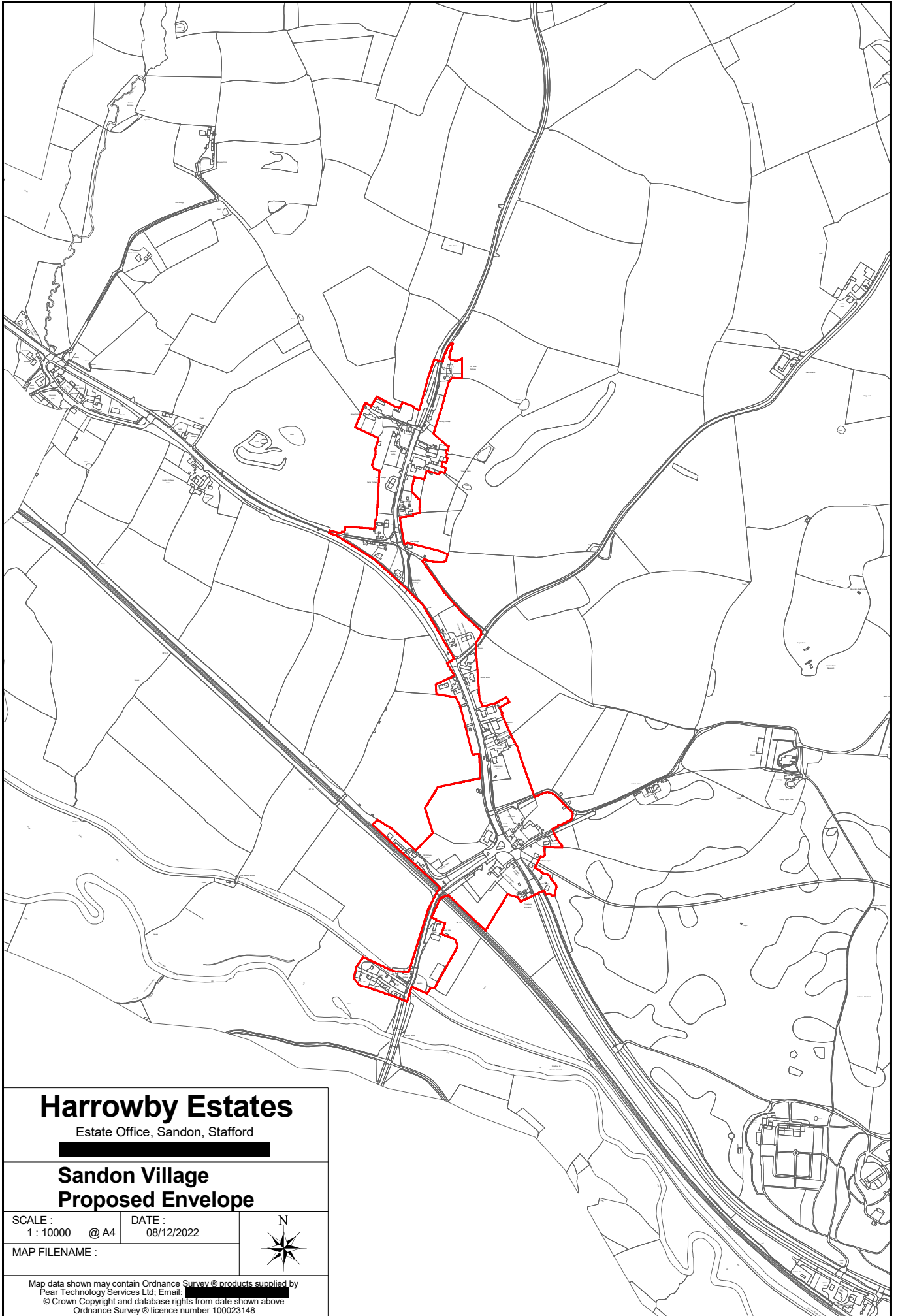
Comments: **No reply**

**Q15** - Do you think there is any further evidence required? **No**

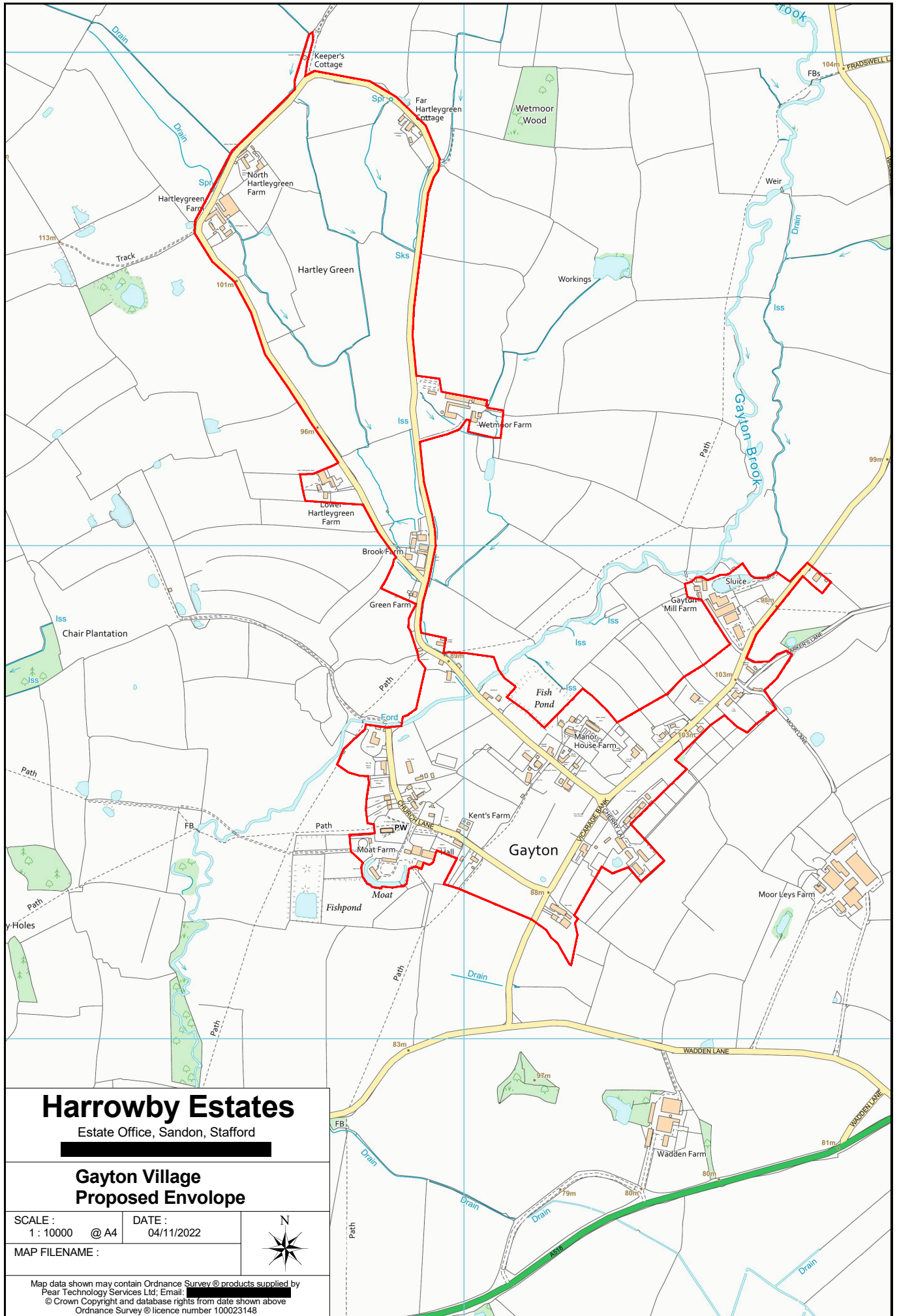
Comments: **No reply**

### **General Comments:**

**I have sent by separate email (as per discussions with your planning officer) a suggested Village Boundary for Sandon that we ask is considered as part of this submissions. Additionally I ask that a copy of my submissions is sent to [REDACTED] for our records as there appears to be no ability to print out my responses to this survey.**







# Harrowby Estates

Estate Office, Sandon, Stafford

## Gayton Village Proposed Envelope

SCALE :  
1 : 10000 @ A4

DATE :  
04/11/2022



MAP FILENAME :

Map data shown may contain Ordnance Survey © products supplied by  
Pear Technology Services Ltd; Email: [REDACTED]  
© Crown Copyright and database rights from date shown above  
Ordnance Survey © licence number 100023148

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**From:** Christian Orr [REDACTED]  
**Sent:** 12 December 2022 10:27  
**To:** Strategic Planning Consultations; Strategic Planning  
**Subject:** Preferred Options Local Plan - Representations  
**Attachments:** HSL Representations - Preferred Options - Dec 2022.pdf; HSL Representations - Preferred Options - Dec 2022.docx; Vision and Delivery Statement - Radford Bank.pdf

Dear Sir/Madam,

I am writing to respond to the Preferred Options Local Plan consultation. I have tried to respond on the website page but the comments boxes have a maximum word limit and will not accept all of my comments. It's also unclear if I can submit supporting documents in PDF. I have called the planning admin telephone number and was told it would be acceptable, as an alternative, to send our comments directly to this email address.

I have attached our representations in PDF and Word format so that it is easier for your teams to collate. The representations are ordered under Policy matters.

Appendix A, a Vision and Delivery Statement, is attached separately. I will be sending a hard copy of this document to officers in the post.

Please can you confirm receipt?

Kind regards,  
Christian

**Christian Orr** MTCP (Hons) MRTPI  
**Land & Planning Director**



[REDACTED]

[REDACTED]

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## Contact Details

**Full name (required):** Christian Orr

**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

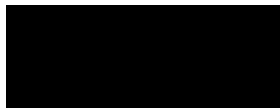
**Organisation or Company Name (if applicable):** Hollins Strategic Land

**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:

The Plan sets a minimum housing requirement across the Borough of 10,700 net additional dwellings for the period 2020 to 2040, at a rate of 535 dwellings per annum (dpa). Paragraph 61 of the Framework provides:

*“To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.”*

Local Housing Need is defined in Annex 2 of the Framework:

*“The number of homes identified as being needed through the application of the standard method set out in national planning guidance (or, in the context of preparing strategic policies only, this may be calculated using a justified alternative approach as provided for in paragraph 61 of this Framework).”*

As set out in the Government’s previous White Papers and echoed in the proposed Levelling Up and Regeneration Bill, the UK Government is striving to deliver 300,000 new homes per year in England by the mid-2020s. The Government’s 2020-21 Housing Supply; net additional dwellings report indicates that the annual housing supply amounted to only 216,490 dwellings, a decrease of 11% on 2019-20. The

annual housing delivery across England has never reached 250,000<sup>1</sup>. It is therefore abundantly clear that there is a national housing crisis and boosting the supply of housing now is increasingly important to meeting the objective of the Government. Indeed, it is a national public imperative for those who aspire to have and need a home can have a home.

As explained in paragraphs 1.2 of the Plan, the 535 dwellings per year is calculated on the basis of the 391 dwellings per annum from the standard method with an uplift to 435 dwellings per annum for jobs-based housing growth. Paragraph 1.3 then explains that in addition to the borough's own housing need, the development strategy also allows for 2,000 homes as a contribution to meeting unmet need of other authorities in the region. This equates to 100 dwellings per annum.

Paragraph 2a-010 of the PPG states:

*“When might it be appropriate to plan for a higher housing need figure than the standard method indicates?”*

*The Government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.*

*This will need to be assessed prior to, and separate from, considering how much of the overall need can be accommodated (and then translated into a*

*housing requirement figure for the strategic policies in the plan). Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:*

- *growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);*
- *strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or*

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<sup>1</sup> Live tables on housing supply: net additional dwellings – Table 118: annual net additional dwellings and components, England and the regions

- *an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground;*

*There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently-produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method. 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.”*

The circumstances in the Borough provide clear justification for the application of a higher requirement than the standard method, in accordance with the Framework and paragraph 2a-010 the PPG. These are as follows.

### **Economic Uplift**

Paragraph 82 of the Framework sets out four criteria. We set these out and summarise why the Plan fails to meet each.

set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;

set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;

seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and

be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.”

The PPG clearly recognises at paragraph 2a-010 that the standard method does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. If the amount of housing growth is not sufficient to align with jobs growth, this will serve to constrain economic growth and place significant strain on the housing market due to the additional demand.

Therefore, to understand whether an alternative approach to the standard method is justified, it is critical that an appropriate level of jobs growth is identified. Only then can it be considered how many homes are required to support that growth. The key evidence base document, the EHDNA, is clear that the developments proposed in the Plan, these being the Garden Community and Stafford Station Gateway, are anticipated to generate around 12,470 jobs (Scenario E: CE Jobs Growth



Regeneration). This equates to 647 dwellings per annum which is then increased to 711 dwellings per annum (Partial Catch up).

However, the Plan has pursued Scenario D: CE Baseline which paragraph 10.56 states:

*“This scenario considers the jobs growth of c.5,920 over the plan period in line with the CE baseline projections. In order to support this level of jobs growth between 2020 and 2040, 435 dpa (489dpa PCU) are required.”*

The difference in jobs growth is significant in that Scenario D anticipates 5,290 jobs whereas Scenario E anticipates 12,470 jobs over the plan period. Paragraph 10.71 of the EHDNA encapsulates why progressing with Scenario D is not positively prepared, justified, effective or consistent with national policy. It states:

*“The CE Baseline indicates considers jobs growth of c.5,930 jobs between 2020 and 2040 – with a requirement for 435 dpa (489 dpa PCU). **This level of jobs growth is significantly lower than past trends in jobs growth in the Borough and does not reflect the Council’s future growth aspirations.**”(our emphasis)*

Paragraph 10.73 summarises why Scenario D should be pursued. It states:

*“The CE Jobs Growth Regeneration scenario considers the implications of a new Garden Community and Stafford Station Gateway with respect to the jobs these developments are expected to generate. With regard to a New Garden Community, Lichfields have identified that 300 dpa represents a reasonable upper limit to future housing delivery over an extended period on large sites. As such, the Regeneration scenario assumes that a new Garden Community will be delivered from 2030 onwards, with 30% of the development being delivered by 2040. This results in a jobs growth of c. 12,470 jobs over the plan period, with a housing requirement of 647 dpa (711 dpa PCU). This scenario therefore reflects the Council’s economic growth aspirations.”*

Given that Meecebrook and Station Gateway are included in the Plan, then this is the only scenario that can be pursued, particularly when HS2 Phase 1 is under construction. The line is expected to open between 2029 and 2033. For Stafford, the HS2 website<sup>2</sup> states:

*“Becoming a high-speed rail destination presents huge opportunities for the town. It is already spearheading the creation of exciting local growth plans which will benefit communities in the surrounding area. Among them is the proposed regeneration of a 28-hectare site next to Stafford railway station, which was quick to catch the eye of developers and leading leisure chains. This investment will revitalise the gateway to the town, breathing life back into the old manufacturing and industrial units of yesteryear.*

<sup>2</sup> <https://www.hs2.org.uk/the-route/west-midlands-to-crewe/stafford-station/>

*Stafford has already benefitted from millions of pounds of investment with the Riverside Development. And now plans for Eastgate and the Northern Town Centre regeneration schemes are underway. HS2's arrival will help inspire continued growth, paving the way for Stafford to reap the benefits in the way that other major population centres, such as Birmingham, have seen.*

*HS2 will create jobs and secure investment years before it arrives. The Constellation Partnership covers Cheshire and Staffordshire. It has ambitions to deliver 100,000 new homes and 120,000 new jobs by 2040, spurred on by HS2 connectivity. The HS2 Growth Strategy predicts that this growth will be worth £6.4 billion."*

Paragraph 2.44 of the EHDNA states that "Stafford Station Gateway Masterplan to take advantage of direct links to HS2, with 6,500 new jobs proposed in office, commercial, logistics and leisure with 800 homes". These 6,500 new jobs in this one location (Constellation Partnership (2017): HS2 Growth Strategy) is higher than the 5,920 in Scenario D again demonstrates that the Plan is not sound or positively prepared.

Paragraphs 4.19 and 4.20 of the Housing and Employment Land requirement Topic Paper state:

*"4.19 Stafford Station Gateway is not at present a fully consented scheme and it is largely not in public ownership. There is as yet no published masterplan for the site or adopted planning policy. Moreover, more recent estimates of the site's capacity to accommodate employment land, supplied by the landowners, indicate a significantly reduced potential quantum of office space. More recent estimates suggest 3,090m<sup>2</sup> of office accommodation and 9,825m<sup>2</sup> of workspaces (likely use class E(g)(iii)). It is therefore at present unlikely that the scheme will deliver the employment land quantities modelled in the EHDNA.*

*4.20 Similar questions arise in relation to the delivery of 30ha of employment land and 3,713 jobs at a garden community by 2040 (see EHDNA para 7.36 and table 7.4). More recent estimates suggest delivery of 15ha within the plan period. Additionally, more recent estimates of likely retail floorspace quantum at Meecebrook indicate this would be substantially less than the EHDNA modelled."*

However, as paragraph 7.33 of the EHDNA states "More detailed information, provided by the Council, suggests that around 456,000 sqm of employment floorspace could be provided on a site (net), of which 400,000 sqm could specifically relate to B-Class employment". Therefore the EHDNA was prepared on evidence provided by the LPA and it is the EHDNA which forms the independent evidence

base for the Plan. In addition, even if the projections for Scenario E were less, it would not justify reverting to Scenario D which is well below past trends and the jobs expected at the Gateway site.

To conclude, the Plan fails to apply the clear and compelling evidence base and it is clear that the Plan as proposed would act as an impediment to achieving the economic objectives by failing to provide sufficient housing in the Borough but particularly Stafford.

## **Affordable housing need**

### **Stafford Borough**

There is no uplift from the minimum local housing need to meet affordable housing needs. Paragraph 2a-024 of the PPG states:

*“An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.”*

The EHDNA sets out three stages to assess affordable housing needs, which are:

Stage 1: Current Housing Need Steps 1.1 to 1.4

Stage 2: Future Need steps 2.1 to 2.3

Stage 3: Affordable Housing Supply steps 3.1 to 3.8

This culminates in Table 11.10 (Stafford Borough Affordable Housing Need Calculation: Housing Register Approach) where the Net Annual Affordable Housing Need is a range of 252 to 389 affordable homes per annum. The Executive Summary states:

*“Affordable housing need is in the range between 252 and 389 affordable homes per annum between 2020 to 2040 which represents a significant proportion of the LHN based on the standard method (408 dpa) and would require at least a 36% delivery rate even if the Regeneration PCU scenario of 711 dpa were pursued. It is for the Council to consider the evidence contained in this EHDNA when identifying a housing requirement which would support the strategy underpinning the emerging plan and whether an uplift beyond the standard method is appropriate.”*

The implication of the above is that there is no prospect of achieving even close to the required level of affordable housing in the context of the proposed housing requirement or higher. Nevertheless, the do-nothing approach pursued by applying the standard method with a jobs-based housing growth is not sound in the face of a compelling affordable housing need. The scale of need is significant that an uplift in the housing requirement is the only logical response. The response must be to significantly boost the release of viable and deliverable open-market schemes to bridge the gap and meet the identified need for affordable homes. Due to viability and remediation costs of urban and brownfield land, the release of greenfield land is

an realistic way to deliver policy compliant affordable housing across the Borough and sites should only be allocated on the basis that demonstrate they can deliver the required level of affordable housing. The Plan proposed to reduce affordable housing policy requirement compared to current policy which will mean meeting affordable needs will get more difficult, not better.

### Stafford Town

The EHDNA states that “*deprivation within the Borough is low, despite some areas of Stafford town being in the top 10% for deprivation nationally*”. The EHDNA reports that affordability ratios have worsened; and lower quartile affordability ratios are worse than median ratios, indicating that those on lower incomes may struggle to afford even lower priced properties.

Table 11.6 of the EHDNA sets out the affordable housing needs as set out below.

Table 11.6 Future Affordable Housing Needs by Sub-Area

Component	Rural East		Rural North		Rural West		Stafford		Stone	
	25%	33%	25%	33%	25%	33%	25%	33%	25%	33%
Newly forming households (Gross per annum)	74		158		149		535		136	
% unable to rent or buy in the private market	38.6%	25.7%	25.0%	15.6%	31.4%	20.1%	48.5%	33.7%	38.3%	25.0%
Newly forming households unable to afford market housing (per annum)	28	19	40	25	47	30	260	180	52	34
Existing households falling into need (annual average)	19		41		38		138		35	
<b>Estimate of Future Housing Need (p.a.)*</b>	<b>46</b>	<b>37</b>	<b>79</b>	<b>64</b>	<b>83</b>	<b>67</b>	<b>387</b>	<b>309</b>	<b>85</b>	<b>67</b>

The table shows that the vast majority of affordable housing need is in Stafford town, yet the Plan proposes 0% affordable housing policy on brownfield sites in Stafford town (which includes the Stafford Gateway allocation) and the SA raises concerns that - even assuming 0% affordable - some sites are only marginally viable. Therefore, the affordable needs will not be met where they arise and affordability will worsen with this Plan without a better choice of sites that can viably deliver affordable housing.

To conclude, the identified need for affordable housing will not be met. Stafford Borough faces an affordability crisis that requires urgent and radical policy responses through the Local Plan. Under such circumstances an increase in the housing requirement in accordance with the PPG is reasonable and necessary.

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

Yes

### **Policy 2 Comments:**

Stafford is the only Tier 1 settlement in the hierarchy, this is supported.

The town is the principal administrative centre for the County and Borough Councils, acting as a sub-regional centre of governance for a number of County-wide services including Police and Fire services, the local Health Authority, a range of Government bodies and other agencies. It is the Borough's major employment centre, containing the largest concentration of commercial premises and multiple retailers, as well as many of the key visitor attractions which provide tourism related employment. It is also the principal cultural centre of the Borough.

Paragraph 2.3 of the explanatory text states that focusing new development on the higher tiers of the settlement hierarchy in Policy 1, will ensure that development takes place in the most sustainable locations.

Stafford town has an existing population of around 70,145 people (Census 2021). The population recorded in 2011 was 68,472 with 62,440 recorded in 2001. This shows a significant reduction in population growth in the urban area (from +9.7% to +2.4%) despite growth across the borough of +4.5% from 130,900 in 2011 to 136,800 in 2021. The borough's population grew slower than the West Midlands (6.2%) and England (6.6%) overall. Part of this is likely caused by a lack of housing within or close to the town which has a knock-on effect in increasing longer commuting patterns outside the town. The emerging Local Plan recognises that an increase in the number of people living in the town will *"support a vibrant economy, ensure the efficient use of land and deliver sustainable communities going forward"*. More allocations close to Stafford town will assist as we do question whether sufficient deliverable land and the right sites have been allocated in the town, particularly sites which can deliver affordable housing.

We support the designation of Stafford as the only Tier 1 settlement in the Borough's hierarchy and the recognition that as a Tier 1 settlement, Stafford is the most sustainable location for future growth.

### **Policy 3. Development in the open countryside - general principles**

No

### **Policy 3 Comments:**

We object to Policy 3 as drafted. The policy is overly restrictive and does not reflect national planning policy.

The explanatory text at paragraph 3.1 states that the aim of this policy is *'to protect the open countryside for its own sake'*. This is a reference to the now superseded

PPG7 which dates back to 1997. The emphasis changed in the revised PPS7 in 2004 to the '*continued protection of the open countryside for the benefit of all*'. The Framework, 2021, is less restrictive than its predecessors. There is no requirement in national policy to 'protect the countryside for its own sake'. Therefore, the fundamental basis for the policy is incorrect.

The Framework does not generally presume against development in the countryside in the same way that it does in the Green Belt. The Framework states that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities (paragraph 79) and also sets circumstances in which isolated homes in the countryside may be acceptable (paragraph 80). Furthermore, the Framework supports a prosperous rural economy through the sustainable growth and expansion of all types of businesses in rural areas (paragraphs 84 & 85).

In summary, the premise on which the policy is based is incorrect. It should be redrafted to provide for development required for local needs in the open countryside and to help promote a strong economy. This would accord with the presumption in favour of sustainable development established in national policy.

#### **Policy 4. Climate change development requirements**

Yes / No

#### **Policy 4 Comments:**

N/A

#### **Policy 5. Green Belt**

Yes / No

#### **Policy 5 Comments**

N/A

**Policy 6. Neighbourhood plans**

Yes / No

**Policy 6 Comments:**

N/A



## **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:**

Policy 7 proposes a new settlement at Meecebrook. We object to the proposed allocation for the following reasons.

First, it is extremely unlikely that development will be delivered in the timescales anticipated. Criterion B indicates that the new settlement will provide at least 3,000 homes within the plan period. The trajectory at Appendix 6 of the Preferred Options Plan shows that the site is expected to deliver 300 homes per annum in 2030/1 with an additional 300 homes built each year for the rest of the plan period.

The Lead-in Times and Build Rate Assumptions Topic Paper (Preferred Options Stage) sets out the lead-in times for development sites based on scale. The lead-in period for a scheme of 500 plus houses used by Stafford is 4.5 years assuming an outline application is submitted in the first instance. The report acknowledges at paragraph 4.7 that there is a risk that sites with 1,000 dwellings or more may have longer lead-in times than this. The only example provided relates to outline planning permission 16/25450/OUT for land north of Beaconside, Stafford for mixed-use development including the construction of up to 2,000 new homes. This outline application was submitted in December 2016 and approved on 30<sup>th</sup> May 2022, almost 5.5 years. The Lead-in Times and Build Rate Assumptions Topic Paper concludes that for larger sites the council should collaborate with developers to establish realistic delivery trajectories.

The Topic Paper also refers to the Lichfields' Start to Finish report. Table 5 suggests the average timeframe from validation to completion of first dwelling for developments of 2,000 or more dwellings is 8.4 years. Taking the lead-in period from Lichfields together with the significant infrastructure required at Meecebrook the delivery of the first homes in 2030 is unrealistic.

The assumed build rate for Meecebrook at 300 dwellings per annum is also not consistent with the build rate set out at paragraph 5.22 of the Topic Paper of 160 per annum. Applying the council's own delivery rate to the trajectory set out at Appendix 6 would result in the delivery of 1,600 dwellings at Meecebrook over the plan period assuming that dwellings are delivered in 2030/31, 1,400 less than set out in the trajectory.

The Framework requires local planning authorities to make a realistic assessment of likely delivery rates, given the lead-in times (paragraph 73 d). The anticipated delivery set out in the trajectory does not meet this requirement.

Second, the employment allocation proposed at Meecebrook is the largest employment allocation within the Plan. There is no evidence that employment uses would be commercially viable given the distance of the site from the M6 and from Stafford town where key jobs are situated. The Sustainability Appraisal notes concerns about an imbalance between jobs and housing with the Plan potentially creating longer commuting issues.

Third, the settlement hierarchy as set out at Policy 2 identifies Stafford as a Tier 1 settlement, Stone as a Tier 2 settlement and Meecebrook Garden Community as a Tier 3 settlement. Stafford is recognised at the borough's main centre for employment benefitting from the most extensive public transport services and that residents of new homes in Stafford will need to travel less than will have access to a greater range of facilities (paragraph 1.11 of the Plan). The proposed allocation of new homes (Stafford 59%, Stone 7% and Meecebrook 24%) is not consistent with the settlement hierarchy set out at Policy 2. Furthermore, the proposed allocation of housing in Meecebrook further away from key services and facilities in the main Tier 1 town of Stafford is not supported. The allocation is not in accordance with the settlement hierarchy and would not result in a sustainable pattern of development.

Fourth, the development at Meecebrook is dependent upon significant infrastructure in particular the construction of a new railway station on the West Coast Main Line. Not only does this have implications in terms of timescales for delivery but there are alternative sites in the Tier 1 settlement of Stafford where this infrastructure is already in place and HS2 is to open in the plan period.

Fifth, paragraph 73 of the Framework states that:

*The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes) (our emphasis)*

At present, it has not been demonstrated that Meecebrook has met these tests.

Six, part of the site lies within Flood Zone 2 and 3 (see page 19 of vision document). Paragraph 161 and 162 of the Framework set out the principle of the sequential test

which aims to steer new development to areas with the lowest risk of flooding from any source. It states that development should be allocated or permitted if there are reasonably available sites appropriate for the development in areas with a lower risk of flooding. There does not appear to be a sequential test included with the Meecebrook Evidence Base documents.

Finally, Appendix 9 of the Preferred Options Plan is entitled 'Meecebrook Garden Community concept masterplan, design and development principles and infrastructure delivery schedule'. The text states that the documents are under preparation and will be included at the Regulation 19 stage. The preparation of the plan should be evidence led. We object to this omission as this evidence should be available for consultation at this stage. Its absence suggests that the evidence is to be retrofitted to the Plan.

The above representations are made should the allocation remain in the Plan. Policy 1 uplifts the housing requirement by 100 dwellings per annum (2,000 dwellings over the plan period) to meet the unmet needs of the Black Country. Paragraph 1.4 then states:

*"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."*

On the 19th October 2022, a joint statement of the Leaders of Dudley MBC, Sandwell MBC, Walsall Council, City of Wolverhampton stated that:

*"The four Local Planning authorities in the Black Country have been working together on a joint plan for the area to 2039. It is with regret that we are unable to reach agreement on the approach to planning for future development needs within the framework of the Black Country Plan."*

*"Local Plans for the four Black Country Councils will now provide the framework for the long-term planning of the Black Country. The Black Country Plan 2039 work programme will end and we will now transition to a process focused on Local Plans. The issues of housing and employment land need will now be addressed through individual Local Plans for each of the authorities. The Councils will co-operate with each other and with other key bodies as they prepare their Local Plans."*

This raises the question as to whether these unmet needs will be required and if not, Meecebrook would not be needed at this stage. If at a later date the allocation was to be removed the balancing 1,000 dwellings from Meecebrook would have to be redistributed elsewhere in Stafford and in accordance with Policy 2, the vast majority should be located at Stafford.

## 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

#### **Policy 9 Comments:**

We have no objection to this allocation. We would, however, question the delivery of the remaining 2,700 homes throughout the plan period.

The trajectory at Appendix 6 assumes that 83 dwellings will be delivered in 22/23 rising to 219 between 25/26 and 27/28 before falling again for the remainder to the period to between 120 and 155 dwellings per annum. The housing trajectory at Appendix 6 indicates that the first 700 dwellings, which have planning permission (20/32039/REM), will be delivered by 2026/27.

The trajectory is dependent upon a reserved matters being forthcoming within the next 4 years. As set out above, as the outline consent took 6 years to be approved the timescales for delivery set out in Appendix 6 of the Preferred Options are optimistic.

The assumed delivery rate between 25/26 and 27/28 per annum is not consistent with the build rate set out at paragraph 5.22 of the Lead-in Time and Build Rate Assumptions Topic Paper of 160 per annum for sites of over 2,000 dwellings. The Land for New Homes report (2022) indicates that previous housing delivery in the

Northern Strategic Development Location did not exceed 76dpa on any one site or 130dpa across all sites within one year, with the average delivery on any single site being 33dpa between 2014/15 and 2021/22. It is therefore unclear why the annual delivery across this allocation is expected to reach 219dpa. Local evidence suggests this is unprecedented in Stafford and is therefore unrealistic.

It is also of relevance that the outline planning permission for 2,000 homes on this site (16/25450/OUT) only 12% are expected to be affordable homes reinforcing our concern that the Plan is unlikely to meet the identified affordable housing need.

**Policy 10. West of Stafford**

Yes / No

**Policy 10 Comments:**

N/A

**Policy 11. Stafford Station Gateway**

Yes

**Policy 11 Comments:**

Stafford Station Gateway is a proposed mixed-use development anticipated to deliver in the order of 900 new homes. The housing trajectory at Appendix 6 shows that the site is anticipated to deliver 70 dwellings per annum from 2028/29 rising to 100 per annum for 2038/39 and 2039/40.

Paragraph 4.19 of the Housing and Employment Land requirement Topic Paper states:

*“Stafford Station Gateway is not at present a fully consented scheme and it is largely not in public ownership. There is as yet no published masterplan for the site or adopted planning policy. Moreover, more recent estimates of the site’s capacity to accommodate employment land, supplied by the landowners, indicate a significantly reduced potential quantum of office space. More recent estimates suggest 3,090m<sup>2</sup> of office accommodation and 9,825m<sup>2</sup> of workspaces (likely use class E(g)(iii)). It is therefore at present unlikely that the scheme will deliver the employment land quantities modelled in the EHDNA.*

Given that there is no masterplan and questions have been raised over the quantum of employment, then to predict some 900 dwellings, which equates to some 10% of the housing requirement over the plan period, is not justified. We support the need for the site and the homes and employment it will create but given that the trajectory has 70 dwellings per annum from 2028/29 which increases to 100 dwellings for 2038/39 and 2039/40, the site does not meet the housing needs in Stafford now.

The HSL site, at Radford Bank (SHELAA ref: STAFMB22), is a site that can meet some of these short term needs in a sustainable location.

**Policy 12. Other housing and employment land allocations.**

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

No

Policy 1 states that the annual requirement for the period 2020 – 2040 is 535 dwellings per year which equates to 10,700. Paragraph 1.7 states that the plan identifies or allocates sufficient land for approximately 12,580 homes. The flexibility allowance is some 17.5%, which is generally supported in principle. However, as we have assessed earlier, we have significant concerns on the delivery rates of:

- Meecebrook;
- Station Quarter, Stafford
- North of Stafford.

We comment on other housing allocations in Policy 12 as follows:

**Stafford West**

The trajectory includes a significant increase from 150 dwellings per annum to 250 dwellings per annum for years 2026/27, 2027/28 and 2028/29 with 202 dwellings in 2029/30. The Lichfield Start to Finish report expects an average of 160 dwellings per annum from sites of 2,000 dwellings or more which is below the figures for Stafford West. There is no evidence as to why there is this significant increase and the trajectory should be revised downwards for this site.

**Land at Ashflats (STAFMB03) (capacity 268)**

The SHELAA considers the site to be available, achievable and suitable. From our review of the site it is clear that it is landlocked by the rail line to the east, the M6 to the west and Ash Flats Lane to the north. The Plan states that the site can be accessed through the demolition of Lawford House but evidence of ownership is required. Lawford House and the proposed allocation was the subject of an application which was refused and dismissed at appeal in February 2014. Unlike the proposed allocation, Lawford House is not included in the red line so the access considered acceptable on appeal cannot be delivered as currently proposed. Given that Ash Flats Lane which is a narrow-unmarked road with no footpaths along its length to where it connects to Barn Bank Lane we consider this is also not a suitable alternative option. The SHELAA is silent on a suitable access for the 268 homes proposed and on the available evidence the site is not suitable and therefore undeliverable.

**Stafford Police Station (STAFMB12) (capacity 13)**

The SHELAA considers the site to be available, achievable and suitable. From our review of the site the allocation is based on the relocation of the Police Station. However, no evidence is provided. From our research, the latest position in the Report to the Police Fire and Crime Panel dated 31st January 2022 is “Capital investment needed to support either site relocation or site redevelopment”. A figure of £500,000 is then set out for 22/23 and 23/24. Therefore, we question the availability of the site.

### **Former Staffordshire University Campus (HOP03) (capacity 98)**

The SHELAA considers the site to be available, achievable and suitable. From our review of the site the allocation is based on the site being available in the next 5 years. As the LPA will be aware, the most recent application was 22/35765/FUL for the change of use from student accommodation to asylum seeker accommodation. That application was refused and there is no evidence in the Plan that this site is available.

### **MoD Site 4 (HOP08)**

The SHELAA considers the site to be available, achievable and suitable. From our review of the site the allocation is based on the site being available in the next 5 years. The SHELAA states that the site is not developable as “The current user would need to be relocated to remove the constraint”. No timetable is provided and even if the site was to be made available, the site needs significant remediation.

### **Conclusion**

The Council’s housing land supply has been inflated on sites that are not deliverable or based on unrealistic delivery rates. We question whether the Council has even made contact with the landowner’s to scrutinise whether information provided remains up-to-date to support their allocation. Therefore, additional land is required and must be released. As we set out in the next section, the site HSL is promoting is a site that can deliver a green-infrastructure led scheme alongside up to 60 dwellings which would make an important contribution to the short-term housing need as well as delivering on key green-infrastructure and public benefits that the Plan seeks.



**Policy 12 Comments:**

N/A
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**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:**

N/A
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**Policy 14. Penk and Sow Countryside Enhancement Area (Stafford Town)**

No

**Policy 14 Comments:**

Policy 14 identifies the Penk and Sow Countryside Enhancement Area as an area which will be conserved and enhanced to provide a major nature conservation and recreational resource for Stafford and sets the council's intention to prepare a masterplan to improve the area's biodiversity and public access amongst other things. One of the priorities of the area is to provide links to surrounding communities, neighbourhoods and the wider recreational access network.

Some of the area identified is in private ownership and the policy provides no indication of how the desired enhancements will be delivered over the plan period. The policy as drafted is not effective.

The objectives of the policy are not without merit and could be delivered within the plan period alongside an element of housing on site we are promoting (STAFMB22). However, the policy as currently drafted is flawed and ineffective as enhancements are dependent upon private landowners. Engagement with the landowners is required to ensure that enhancements can be delivered which we welcome.

**Policy 15. Stone Countryside Enhancement Area**

Yes / No

**Policy 15 Comments:**

N/A

## 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:**

N/A

**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?**

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:**

We object to criterion A. 3. iv which states:

*The character and attractiveness of the countryside is protected.*

This is inconsistent with the Framework which states that valued landscapes should be protected and enhanced. Criterion iv should be reworded to reflect the wording in the Framework as follows:

*The intrinsic character and beauty of the countryside is recognised.*

## 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

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

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

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

Local Plan Preferred Options document reference: pages 74 to 76

### Comments:

We have no specific objection to Policy 23 as to how it would apply to the HSL site. However, we refer back to our representations in respect of Policy 1 which set out that an increase in the housing requirement is needed in order to meet the identified need for affordable housing.

We do object to the failure of the Plan to meet affordable housing needs. Table 11.6 of the EHDNA sets out the affordable housing needs as set out below.

Table 11.6 Future Affordable Housing Needs by Sub-Area

Component	Rural East		Rural North		Rural West		Stafford		Stone	
	25%	33%	25%	33%	25%	33%	25%	33%	25%	33%
Newly forming households (Gross per annum)	74		158		149		535		136	
% unable to rent or buy in the private market	38.6%	25.7%	25.0%	15.6%	31.4%	20.1%	48.5%	33.7%	38.3%	25.0%
Newly forming households unable to afford market housing (per annum)	28	19	40	25	47	30	260	180	52	34
Existing households falling into need (annual average)	19		41		38		138		35	
<b>Estimate of Future Housing Need (p.a.)*</b>	<b>46</b>	<b>37</b>	<b>79</b>	<b>64</b>	<b>83</b>	<b>67</b>	<b>387</b>	<b>309</b>	<b>85</b>	<b>67</b>

The table shows that the vast majority of affordable housing need is in Stafford town, yet the Plan proposes 0% affordable housing policy on brownfield sites in Stafford town (which includes the Stafford Gateway allocation) and the SA raises concerns some sites are only marginally viable. Therefore, the affordable needs will not be met where they arise and affordability will worsen with this Plan if a choice of sites are not allocated that can viably deliver affordable housing.

**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:**

N/A

**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?**

**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:**

Policy 32 – Residential Amenity

We object to the following criteria:

*Criterion 4. Overbearing impact/visual dominance.* There are no specified parameters of when a proposal would be considered to be overbearing and visually dominant. The criteria set out in 1-3 and 5 would ensure that there is no overbearing impact. Criterion 4 is vague, unnecessary and should be deleted.

*Criterion 6: Impact resulting from loss of outlook.* This is not a valid material consideration in the consideration of a planning application and should be deleted.

## 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

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:**

Policy 34 – Urban Design General Principles

We are generally supportive of Policy 34 in setting out key principles to guide urban design.

Paragraph 34.4 of the explanatory text states that a design review at an early stage will be encouraged for 'large and complex sites'. This reference is vague and for the avoidance of doubt, the text should be specific on the scale of development for which a design review is required.



## 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?**

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:

Policy 44 – Landscapes

We object to Policy 41 as drafted for the following reasons.

First, it is assumed that the policy is intended to relate to designated heritage assets however, this is not clear and the policy should be amended to take this into account. The criteria for non-designated heritage assets would need to differ to designated assets and we consider that this should be covered by a separate policy.

Second, part B of the policy states:

*Development proposals shall preserve and where appropriate enhance the significance of heritage assets and their settings by being based on an understanding of the heritage interest, taking opportunities for sustainable re-use and achieving high design quality.*

Part B needs to be revised to distinguish between different types of heritage assets. For example, development proposals affecting a listed building must be considered in the context of the legal duty conferred by s16 (2) and s66 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990. Section 16 (2) relates to the grant of listed building consent and section 66(1) relates to the grant of planning permission. Section 66 (1) states:

*“In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”*

There is no mention in statute of enhancement of the building or its setting. The policy seeks to apply a higher test than is required in law, which is simply one of preservation.

Third, paragraphs 201 and 202 of the Framework allow for less than substantial or substantial harm to a heritage asset if it can be demonstrated that it is necessary to achieve public benefits (or substantial public benefits in the case of substantial harm). Policy 41 is not consistent with the Framework in this regard and should be redrafted to reflect paragraphs 201 and 202 of the Framework.

#### Policy 46 – Green and Blue Infrastructure Network

We do not object to Policy 46 in principle but wish to make the following points.

First Part A of the policy states that the existing green and blue infrastructure network will be protected, enhanced and extended. It is not clear how the areas of green and blue infrastructure in private ownership will be enhanced without support from landowners. In order to enhance these areas we consider it necessary to bring forward development alongside the proposals in order to deliver this. As promoter of site STAFMB22, we have support from the landowners to achieve the objectives set out in the Vision & Delivery Statement (Appendix A) alongside some modest scale development. This would contribute to green infrastructure enhancements in the long term.

Second, Part A also states that the blue and green infrastructure network will be ‘extended’. It is not clear from the policy whether extensions are proposed in addition to those shown on the proposals maps. In terms of extending the blue and green infrastructure, this must be supported by site specific assessments and field surveys to justify the designation of the land.

#### Policy 47 – Biodiversity

Criterion B 3 of the policy requires a 30-year management plan to be submitted with any application. The requirement for a management plan to ensure the gain can be

delivered in perpetuity can be secured by condition. There is no justification to require this to be provided upfront for outline planning applications.

Criterion F relates to sites of local importance including sites covered by a local designation such as Local Nature Reserves and Sites of Biological Importance and undesignated habitats such as natural watercourses, lakes and reservoirs. The policy does not account for the differentiation between sites depending on their position in the hierarchy and is overly restrictive in respect of non-designated sites.

## 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:**

N/A

## 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](http://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:**

Recommendations and commentary in the Sustainability Appraisal need to be carefully considered.

**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:**

We have concerns with the approach to site selection and the SHELAA. Sites currently designated as Green Infrastructure do not have an overriding constraint. This was a missed opportunity where significant GI enhancements could be brought forward with some development (e.g. Site ref: STAFMB22, where over 58% of the site can be dedicated to open space and green infrastructure, biodiversity enhancements). We welcome discussion with policy officers to realise these public benefits.

## 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.

We set out below an overview of the site HSL is promoting for residential development at Radford Bank, Stafford. In the SHELAA the site is referenced STAFMB22. In the assessment the site was not considered suitable simply because “*the site is adjacent to a currently recognised Local Plan settlement but is designated as Green Infrastructure*”. The Site Selection Topic paper is flawed mainly because it excluded sites designated as Strategic Green Infrastructure without considering whether there are the opportunities that a site could deliver not only providing much needed new homes but significant ecological benefits through the creation of new habitats and wildlife corridors and not compromise the Strategic Green Infrastructure designation. Such a review of sites should have been undertaken and in fact the SHELAA itself stated:

*The presence of a suitability constraint on a SHELAA site does not necessarily render it automatically unsuitable. The assessment of suitability requires planning judgement to decide if the constraint is significant enough to make the site unsuitable. Some constraints, such as the presence of a Tree Preservation Order on site, can be factored into the design and would not prevent the site being developed.*

A consequence of this flawed starting point is that the SHELAA assessed the whole of the 5-hectare STAFMB22 site for some 150 dwellings, however the enclosed Vision and Delivery Statement sets out the context of the site and the design vision for a green infrastructure-led allocation with 60 homes on 4.86 hectares in a sustainable location whilst bringing a range of public benefits. Therefore, the only constraint in the SHELAA is addressed by this proposal and it should be reassessed in the Site Selection Paper and SHELAA on that basis.

HSL are engaging with key stakeholders such as The Wildlife Trust and Staffordshire Highways to ensure further robust evidence can be provided as the Plan progresses. We would also welcome meeting with officers to discuss the site merits as we consider the site can deliver many of the objectives stated in the Plan.

To summarise the Vision and Delivery Statement:

Over 58% of the site dedicated to open space, green and blue infrastructure enhancements, equivalent to 2.86 hectares, with new tree planting, ecological corridors and natural equipped children’s play areas;

Mitigation and significant enhancements to biodiversity to provide a net gain with long-term management;

Provision of new ponds and wetland habitats for birds and other wildlife;

A new safe and suitable vehicular access point off Radford Bank with 5.5m road and 2m footways on each side;

An orbital walking route within the site for dog walking and short strolls to provide a suitable local recreational route away from the SAC;

A residential development comprising approximately 60 dwellings satisfying local housing needs and supporting economic aspirations;

An overall net development area of approximately 2.0 hectares, equating to an average moderate density of around 30 dwellings per net hectare;

A balanced range of housing comprising a mix of types and sizes;

Affordable housing provision on-site, in line with the requirements of local planning policy and in an area with high demand;

Provision of sustainable drainage systems which also provide blue infrastructure for wildlife.

Given our representations to Policy 1 and the delivery of allocated site, then we consider the Plan needs to allocate more land and this site, in a Tier 1 location, should be allocated for 60 dwellings including its green infrastructure and public benefits.

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](mailto: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.

# Preferred Options Representations

## Stafford Local 2040

## Hollins Strategic Land

December 2022





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## Appendices

Appendix A          Vision & Delivery Statement





## 1 Introduction

- 1.1 Hollins Strategic Land (HSL) submit these representations to the Stafford Borough Local Plan 2040. HSL have an interest in land at Radford Bank, Stafford. The extent of HSL's interest is shown in the Vision and Delivery Statement (Appendix A) and we promote it for allocation as it is a sustainable and logical choice for an allocation in order to meet the identified development needs in a higher-order settlement close to Stafford town centre.

## 2 Policy 1 Development Strategy

- 2.1 The Plan sets a minimum housing requirement across the Borough of 10,700 net additional dwellings for the period 2020 to 2040, at a rate of 535 dwellings per annum (dpa). Paragraph 61 of the Framework provides:

*“To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.”*

- 2.2 Local Housing Need is defined in Annex 2 of the Framework:

*“The number of homes identified as being needed through the application of the standard method set out in national planning guidance (or, in the context of preparing strategic policies only, this may be calculated using a justified alternative approach as provided for in paragraph 61 of this Framework).”*

- 2.3 As set out in the Government’s previous White Papers and echoed in the proposed Levelling Up and Regeneration Bill, the UK Government is striving to deliver 300,000 new homes per year in England by the mid-2020s. The Government’s 2020-21 Housing Supply; net additional dwellings report indicates that the annual housing supply amounted to only 216,490 dwellings, a decrease of 11% on 2019-20. The annual housing delivery across England has never reached 250,000<sup>1</sup>. It is therefore abundantly clear that there is a national housing crisis and boosting the supply of housing now is increasingly important to meeting the objective of the Government. Indeed, it is a national public imperative for those who aspire to have and need a home can have a home.

- 2.4 As explained in paragraphs 1.2 of the Plan, the 535 dwellings per year is calculated on the basis of the 391 dwellings per annum from the standard method with an uplift to 435 dwellings per annum for jobs-based housing growth. Paragraph 1.3 then explains that in addition to the borough’s own housing need, the development strategy also allows for 2,000 homes as a contribution to meeting unmet need of other authorities in the region. This equates to 100 dwellings per annum.

- 2.5 Paragraph 2a-010 of the PPG states:

*“When might it be appropriate to plan for a higher housing need figure than the standard method indicates?”*

*The Government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides a minimum starting point in determining the*

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<sup>1</sup> Live tables on housing supply: net additional dwellings – Table 118: annual net additional dwellings and components, England and the regions



*number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.*

*This will need to be assessed prior to, and separate from, considering how much of the overall need can be accommodated (and then translated into a housing requirement figure for the strategic policies in the plan). Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:*

- *growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);*
- *strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or*
- *an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground;*

*There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently-produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method. 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.”*

- 2.6 The circumstances in the Borough provide clear justification for the application of a higher requirement than the standard method, in accordance with the Framework and paragraph 2a-010 the PPG. These are as follows.

### **Economic Uplift**

- 2.7 Paragraph 82 of the Framework sets out four criteria. We set these out and summarise why the Plan fails to meet each.
- set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;
  - set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;
  - seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and
  - be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.”

- 2.8 The PPG clearly recognises at paragraph 2a-010 that the standard method does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. If the amount of housing growth is not sufficient to align with jobs growth, this will serve to constrain economic growth and place significant strain on the housing market due to the additional demand.
- 2.9 Therefore, to understand whether an alternative approach to the standard method is justified, it is critical that an appropriate level of jobs growth is identified. Only then can it be considered how many homes are required to support that growth. The key evidence base document, the EHDNA, is clear that the developments proposed in the Plan, these being the Garden Community and Stafford Station Gateway, are anticipated to generate around 12,470 jobs (Scenario E: CE Jobs Growth Regeneration). This equates to 647 dwellings per annum which is then increased to 711 dwellings per annum (Partial Catch up).
- 2.10 However, the Plan has pursued Scenario D: CE Baseline which paragraph 10.56 states:
- “This scenario considers the jobs growth of c.5,920 over the plan period in line with the CE baseline projections. In order to support this level of jobs growth between 2020 and 2040, 435 dpa (489dpa PCU) are required.”*
- 2.11 The difference in jobs growth is significant in that Scenario D anticipates 5,290 jobs whereas Scenario E anticipates 12,470 jobs over the plan period. Paragraph 10.71 of the EHDNA encapsulates why progressing with Scenario D is not positively prepared, justified, effective or consistent with national policy. It states:
- “The CE Baseline indicates considers jobs growth of c.5,930 jobs between 2020 and 2040 – with a requirement for 435 dpa (489 dpa PCU). **This level of jobs growth is significantly lower than past trends in jobs growth in the Borough and does not reflect the Council’s future growth aspirations.**”(our emphasis)*
- 2.12 Paragraph 10.73 summarises why Scenario D should be pursued. It states:
- “The CE Jobs Growth Regeneration scenario considers the implications of a new Garden Community and Stafford Station Gateway with respect to the jobs these developments are expected to generate. With regard to a New Garden Community, Lichfields have identified that 300 dpa represents a reasonable upper limit to future housing delivery over an extended period on large sites. As such, the Regeneration scenario assumes that a new Garden Community will be delivered from 2030 onwards, with 30% of the development being delivered by 2040. This results in a jobs growth of c. 12,470 jobs over the plan period, with a housing requirement of 647 dpa (711 dpa PCU). This scenario therefore reflects the Council’s economic growth aspirations.”*
- 2.13 Given that Meecebrook and Station Gateway are included in the Plan, then this is the only scenario that can be pursued, particularly when HS2 Phase 1 is under construction. The line is expected to open between 2029 and 2033. For Stafford, the HS2 website<sup>2</sup> states:

<sup>2</sup> <https://www.hs2.org.uk/the-route/west-midlands-to-crewe/stafford-station/>



*“Becoming a high-speed rail destination presents huge opportunities for the town. It is already spearheading the creation of exciting local growth plans which will benefit communities in the surrounding area. Among them is the proposed regeneration of a 28-hectare site next to Stafford railway station, which was quick to catch the eye of developers and leading leisure chains. This investment will revitalise the gateway to the town, breathing life back into the old manufacturing and industrial units of yesteryear.*

*Stafford has already benefitted from millions of pounds of investment with the Riverside Development. And now plans for Eastgate and the Northern Town Centre regeneration schemes are underway. HS2’s arrival will help inspire continued growth, paving the way for Stafford to reap the benefits in the way that other major population centres, such as Birmingham, have seen.*

*HS2 will create jobs and secure investment years before it arrives. The Constellation Partnership covers Cheshire and Staffordshire. It has ambitions to deliver 100,000 new homes and 120,000 new jobs by 2040, spurred on by HS2 connectivity. The HS2 Growth Strategy predicts that this growth will be worth £6.4 billion.”*

2.14 Paragraph 2.44 of the EHDNA states that “Stafford Station Gateway Masterplan to take advantage of direct links to HS2, with 6,500 new jobs proposed in office, commercial, logistics and leisure with 800 homes”. These 6,500 new jobs in this one location (Constellation Partnership (2017): HS2 Growth Strategy) is higher than the 5,920 in Scenario D again demonstrates that the Plan is not sound or positively prepared.

2.15 Paragraphs 4.19 and 4.20 of the Housing and Employment Land requirement Topic Paper state:

*“4.19 Stafford Station Gateway is not at present a fully consented scheme and it is largely not in public ownership. There is as yet no published masterplan for the site or adopted planning policy. Moreover, more recent estimates of the site’s capacity to accommodate employment land, supplied by the landowners, indicate a significantly reduced potential quantum of office space. More recent estimates suggest 3,090m<sup>2</sup> of office accommodation and 9,825m<sup>2</sup> of workspaces (likely use class E(g)(iii)). It is therefore at present unlikely that the scheme will deliver the employment land quantities modelled in the EHDNA.*

*4.20 Similar questions arise in relation to the delivery of 30ha of employment land and 3,713 jobs at a garden community by 2040 (see EHDNA para 7.36 and table 7.4). More recent estimates suggest delivery of 15ha within the plan period. Additionally, more recent estimates of likely retail floorspace quantum at Meecebrook indicate this would be substantially less than the EHDNA modelled.”*

2.16 However, as paragraph 7.33 of the EHDNA states “More detailed information, provided by the Council, suggests that around 456,000 sqm of employment floorspace could be provided on a site (net), of which 400,000 sqm could specifically relate to B-Class employment”. Therefore the EHDNA was prepared on evidence provided by the LPA and it is the EHDNA which forms

the independent evidence base for the Plan. In addition, even if the projections for Scenario E were less, it would not justify reverting to Scenario D which is well below past trends and the jobs expected at the Gateway site.

- 2.17 To conclude, the Plan fails to apply the clear and compelling evidence base and it is clear that the Plan as proposed would act as an impediment to achieving the economic objectives by failing to provide sufficient housing in the Borough but particularly Stafford.

### Affordable housing need

#### Stafford Borough

- 2.18 There is no uplift from the minimum local housing need to meet affordable housing needs. Paragraph 2a-024 of the PPG states:

*“An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.”*

- 2.19 The EHDNA sets out three stages to assess affordable housing needs, which are:

- Stage 1: Current Housing Need Steps 1.1 to 1.4
- Stage 2: Future Need steps 2.1 to 2.3
- Stage 3: Affordable Housing Supply steps 3.1 to 3.8

- 2.20 This culminates in Table 11.10 (Stafford Borough Affordable Housing Need Calculation: Housing Register Approach) where the Net Annual Affordable Housing Need is a range of 252 to 389 affordable homes per annum. The Executive Summary states:

*“Affordable housing need is in the range between 252 and 389 affordable homes per annum between 2020 to 2040 which represents a significant proportion of the LHN based on the standard method (408 dpa) and would require at least a 36% delivery rate even if the Regeneration PCU scenario of 711 dpa were pursued. It is for the Council to consider the evidence contained in this EHDNA when identifying a housing requirement which would support the strategy underpinning the emerging plan and whether an uplift beyond the standard method is appropriate.”*

- 2.21 The implication of the above is that there is no prospect of achieving even close to the required level of affordable housing in the context of the proposed housing requirement or higher. Nevertheless, the do-nothing approach pursued by applying the standard method with a jobs-based housing growth is not sound in the face of a compelling affordable housing need. The scale of need is significant that an uplift in the housing requirement is the only logical response. The response must be to significantly boost the release of viable and deliverable open-market schemes to bridge the gap and meet the identified need for affordable homes. Due to viability and remediation costs of urban and brownfield land, the release of greenfield land is a realistic way to deliver policy compliant affordable housing across the Borough and sites should only be allocated on the basis that demonstrate they can deliver the required level of affordable housing. The Plan proposed to reduce affordable housing policy requirement compared to current policy which will mean meeting affordable needs will get more difficult, not better.

### Stafford Town

- 2.22 The EHDNA states that “deprivation within the Borough is low, despite some areas of Stafford town being in the top 10% for deprivation nationally”. The EHDNA reports that affordability ratios have worsened; and lower quartile affordability ratios are worse than median ratios, indicating that those on lower incomes may struggle to afford even lower priced properties.
- 2.23 Table 11.6 of the EHDNA sets out the affordable housing needs as set out below.

Table 11.6 Future Affordable Housing Needs by Sub-Area

Component	Rural East		Rural North		Rural West		Stafford		Stone	
	25%	33%	25%	33%	25%	33%	25%	33%	25%	33%
Newly forming households (Gross per annum)	74		158		149		535		136	
% unable to rent or buy in the private market	38.6%	25.7%	25.0%	15.6%	31.4%	20.1%	48.5%	33.7%	38.3%	25.0%
Newly forming households unable to afford market housing (per annum)	28	19	40	25	47	30	260	180	52	34
Existing households falling into need (annual average)	19		41		38		138		35	
<b>Estimate of Future Housing Need (p.a.)*</b>	<b>46</b>	<b>37</b>	<b>79</b>	<b>64</b>	<b>83</b>	<b>67</b>	<b>387</b>	<b>309</b>	<b>85</b>	<b>67</b>

- 2.24 The table shows that the vast majority of affordable housing need is in Stafford town, yet the Plan proposes 0% affordable housing policy on brownfield sites in Stafford town (which includes the Stafford Gateway allocation) and the SA raises concerns that - even assuming 0% affordable - some sites are only marginally viable. Therefore, the affordable needs will not be met where they arise and affordability will worsen with this Plan without a better choice of sites that can viably deliver affordable housing.
- 2.25 To conclude, the identified need for affordable housing will not be met. Stafford Borough faces an affordability crisis that requires urgent and radical policy responses through the Local Plan. Under such circumstances an increase in the housing requirement in accordance with the PPG is reasonable and necessary.



### 3 Policy 2 Settlement Hierarchy

- 3.1 Stafford is the only Tier 1 settlement in the hierarchy, this is supported.
- 3.2 The town is the principal administrative centre for the County and Borough Councils, acting as a sub-regional centre of governance for a number of County-wide services including Police and Fire services, the local Health Authority, a range of Government bodies and other agencies. It is the Borough's major employment centre, containing the largest concentration of commercial premises and multiple retailers, as well as many of the key visitor attractions which provide tourism related employment. It is also the principal cultural centre of the Borough.
- 3.3 Paragraph 2.3 of the explanatory text states that focusing new development on the higher tiers of the settlement hierarchy in Policy 1, will ensure that development takes place in the most sustainable locations.
- 3.4 Stafford town has an existing population of around 70,145 people (Census 2021). The population recorded in 2011 was 68,472 with 62,440 recorded in 2001. This shows a significant reduction in population growth in the urban area (from +9.7% to +2.4%) despite growth across the borough of +4.5% from 130,900 in 2011 to 136,800 in 2021. The borough's population grew slower than the West Midlands (6.2%) and England (6.6%) overall. Part of this is likely caused by a lack of housing within or close to the town which has a knock-on effect in increasing longer commuting patterns outside the town. The emerging Local Plan recognises that an increase in the number of people living in the town will *"support a vibrant economy, ensure the efficient use of land and deliver sustainable communities going forward"*. More allocations close to Stafford town will assist as we do question whether sufficient deliverable land and the right sites have been allocated in the town, particularly sites which can deliver affordable housing.
- 3.5 We support the designation of Stafford as the only Tier 1 settlement in the Borough's hierarchy and the recognition that as a Tier 1 settlement, Stafford is the most sustainable location for future growth.

## 4 Policy 3 Development in the Open Countryside

- 4.1 We object to Policy 3 as drafted. The policy is overly restrictive and does not reflect national planning policy.
- 4.2 The explanatory text at paragraph 3.1 states that the aim of this policy is '*to protect the open countryside for its own sake*'. This is a reference to the now superseded PPG7 which dates back to 1997. The emphasis changed in the revised PPS7 in 2004 to the '*continued protection of the open countryside for the benefit of all*'. The Framework, 2021, is less restrictive than its predecessors. There is no requirement in national policy to 'protect the countryside for its own sake'. Therefore, the fundamental basis for the policy is incorrect.
- 4.3 The Framework does not generally presume against development in the countryside in the same way that it does in the Green Belt. The Framework states that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities (paragraph 79) and also sets circumstances in which isolated homes in the countryside may be acceptable (paragraph 80). Furthermore, the Framework supports a prosperous rural economy through the sustainable growth and expansion of all types of businesses in rural areas (paragraphs 84 & 85).
- 4.4 In summary, the premise on which the policy is based is incorrect. It should be redrafted to provide for development required for local needs in the open countryside and to help promote a strong economy. This would accord with the presumption in favour of sustainable development established in national policy.

## 5 Policy 7 Meecebrook Site Allocation

- 5.1 Policy 7 proposes a new settlement at Meecebrook. We object to the proposed allocation for the following reasons.
- 5.2 First, it is extremely unlikely that development will be delivered in the timescales anticipated. Criterion B indicates that the new settlement will provide at least 3,000 homes within the plan period. The trajectory at Appendix 6 of the Preferred Options Plan shows that the site is expected to deliver 300 homes per annum in 2030/1 with an additional 300 homes built each year for the rest of the plan period.
- 5.3 The Lead-in Times and Build Rate Assumptions Topic Paper (Preferred Options Stage) sets out the lead-in times for development sites based on scale. The lead-in period for a scheme of 500 plus houses used by Stafford is 4.5 years assuming an outline application is submitted in the first instance. The report acknowledges at paragraph 4.7 that there is a risk that sites with 1,000 dwellings or more may have longer lead-in times than this. The only example provided relates to outline planning permission 16/25450/OUT for land north of Beaconside, Stafford for mixed-use development including the construction of up to 2,000 new homes. This outline application was submitted in December 2016 and approved on 30<sup>th</sup> May 2022, almost 5.5 years. The Lead-in Times and Build Rate Assumptions Topic Paper concludes that for larger sites the council should collaborate with developers to establish realistic delivery trajectories.
- 5.4 The Topic Paper also refers to the Lichfields' Start to Finish report. Table 5 suggests the average timeframe from validation to completion of first dwelling for developments of 2,000 or more dwellings is 8.4 years. Taking the lead-in period from Lichfields together with the significant infrastructure required at Meecebrook the delivery of the first homes in 2030 is unrealistic.
- 5.5 The assumed build rate for Meecebrook at 300 dwellings per annum is also not consistent with the build rate set out at paragraph 5.22 of the Topic Paper of 160 per annum. Applying the council's own delivery rate to the trajectory set out at Appendix 6 would result in the delivery of 1,600 dwellings at Meecebrook over the plan period assuming that dwellings are delivered in 2030/31, 1,400 less than set out in the trajectory.
- 5.6 The Framework requires local planning authorities to make a realistic assessment of likely delivery rates, given the lead-in times (paragraph 73 d). The anticipated delivery set out in the trajectory does not meet this requirement.
- 5.7 Second, the employment allocation proposed at Meecebrook is the largest employment allocation within the Plan. There is no evidence that employment uses would be commercially viable given the distance of the site from the M6 and from Stafford town where key jobs are situated. The Sustainability Appraisal notes concerns about an imbalance between jobs and housing with the Plan potentially creating longer commuting issues.
- 5.8 Third, the settlement hierarchy as set out at Policy 2 identifies Stafford as a Tier 1 settlement, Stone as a Tier 2 settlement and Meecebrook Garden Community as a Tier 3 settlement. Stafford is recognised at the borough's main centre for employment benefitting from the most extensive public transport services and that residents of new homes in Stafford will need to travel less than will have access to a greater range of facilities (paragraph 1.11 of the Plan).

The proposed allocation of new homes (Stafford 59%, Stone 7% and Meecebrook 24%) is not consistent with the settlement hierarchy set out at Policy 2. Furthermore, the proposed allocation of housing in Meecebrook further away from key services and facilities in the main Tier 1 town of Stafford is not supported. The allocation is not in accordance with the settlement hierarchy and would not result in a sustainable pattern of development.

5.9 Fourth, the development at Meecebrook is dependent upon significant infrastructure in particular the construction of a new railway station on the West Coast Main Line. Not only does this have implications in terms of timescales for delivery but there are alternative sites in the Tier 1 settlement of Stafford where this infrastructure is already in place and HS2 is to open in the plan period.

5.10 Fifth, paragraph 73 of the Framework states that:

*The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes) (our emphasis)*

5.11 At present, it has not been demonstrated that Meecebrook has met these tests.

5.12 Six, part of the site lies within Flood Zone 2 and 3 (see page 19 of vision document). Paragraph 161 and 162 of the Framework set out the principle of the sequential test which aims to steer new development to areas with the lowest risk of flooding from any source. It states that development should be allocated or permitted if there are reasonably available sites appropriate for the development in areas with a lower risk of flooding. There does not appear to be a sequential test included with the Meecebrook Evidence Base documents.

5.13 Finally, Appendix 9 of the Preferred Options Plan is entitled 'Meecebrook Garden Community concept masterplan, design and development principles and infrastructure delivery schedule'. The text states that the documents are under preparation and will be included at the Regulation 19 stage. The preparation of the plan should be evidence led. We object to this omission as this evidence should be available for consultation at this stage. Its absence suggests that the evidence is to be retrofitted to the Plan.

5.14 The above representations are made should the allocation remain in the Plan. Policy 1 uplifts the housing requirement by 100 dwellings per annum (2,000 dwellings over the plan period) to meet the unmet needs of the Black Country. Paragraph 1.4 then states:

*"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."*

5.15 On the 19th October 2022, a joint statement of the Leaders of Dudley MBC, Sandwell MBC, Walsall Council, City of Wolverhampton stated that:

*“The four Local Planning authorities in the Black Country have been working together on a joint plan for the area to 2039. It is with regret that we are unable to reach agreement on the approach to planning for future development needs within the framework of the Black Country Plan.*

*“Local Plans for the four Black Country Councils will now provide the framework for the long-term planning of the Black Country. The Black Country Plan 2039 work programme will end and we will now transition to a process focused on Local Plans. The issues of housing and employment land need will now be addressed through individual Local Plans for each of the authorities. The Councils will co-operate with each other and with other key bodies as they prepare their Local Plans.”*

- 5.16 This raises the question as to whether these unmet needs will be required and if not, Meecebrook would not be needed at this stage. If at a later date the allocation was to be removed the balancing 1,000 dwellings from Meecebrook would have to be redistributed elsewhere in Stafford and in accordance with Policy 2, the vast majority should be located at Stafford.

## 6 Policy 9 North of Stafford

- 6.1 We have no objection to this allocation. We would, however, question the delivery of the remaining 2,700 homes throughout the plan period.
- 6.2 The trajectory at Appendix 6 assumes that 83 dwellings will be delivered in 22/23 rising to 219 between 25/26 and 27/28 before falling again for the remainder to the period to between 120 and 155 dwellings per annum. The housing trajectory at Appendix 6 indicates that the first 700 dwellings, which have planning permission (20/32039/REM), will be delivered by 2026/27.
- 6.3 The trajectory is dependent upon a reserved matters being forthcoming within the next 4 years. As set out above, as the outline consent took 6 years to be approved the timescales for delivery set out in Appendix 6 of the Preferred Options are optimistic.
- 6.4 The assumed delivery rate between 25/26 and 27/28 per annum is not consistent with the build rate set out at paragraph 5.22 of the Lead-in Time and Build Rate Assumptions Topic Paper of 160 per annum for sites of over 2,000 dwellings. The Land for New Homes report (2022) indicates that previous housing delivery in the Northern Strategic Development Location did not exceed 76dpa on any one site or 130dpa across all sites within one year, with the average delivery on any single site being 33dpa between 2014/15 and 2021/22. It is therefore unclear why the annual delivery across this allocation is expected to reach 219dpa. Local evidence suggests this is unprecedented in Stafford and is therefore unrealistic.
- 6.5 It is also of relevance that the outline planning permission for 2,000 homes on this site (16/25450/OUT) only 12% are expected to be affordable homes reinforcing our concern that the Plan is unlikely to meet the identified affordable housing need.

## 7 Policy 11 Stafford Station Gateway

- 7.1 Stafford Station Gateway is a proposed mixed-use development anticipated to deliver in the order of 900 new homes. The housing trajectory at Appendix 6 shows that the site is anticipated to deliver 70 dwellings per annum from 2028/29 rising to 100 per annum for 2038/39 and 2039/40.
- 7.2 Paragraph 4.19 of the Housing and Employment Land requirement Topic Paper states:
- “Stafford Station Gateway is not at present a fully consented scheme and it is largely not in public ownership. There is as yet no published masterplan for the site or adopted planning policy. Moreover, more recent estimates of the site’s capacity to accommodate employment land, supplied by the landowners, indicate a significantly reduced potential quantum of office space. More recent estimates suggest 3,090m<sup>2</sup> of office accommodation and 9,825m<sup>2</sup> of workspaces (likely use class E(g)(iii)). It is therefore at present unlikely that the scheme will deliver the employment land quantities modelled in the EHDNA.*
- 7.3 Given that there is no masterplan and questions have been raised over the quantum of employment, then to predict some 900 dwellings, which equates to some 10% of the housing requirement over the plan period, is not justified. We support the need for the site and the homes and employment it will create but given that the trajectory has 70 dwellings per annum from 2028/29 which increases to 100 dwellings for 2038/39 and 2039/40, the site does not meet the housing needs in Stafford now.
- 7.4 The HSL site, at Radford Bank (SHELAA ref: STAFMB22), is a site that can meet some of these short term needs in a sustainable location.

## 8 Policy 14 Penk and Sow Countryside Enhancement Area

- 8.1 Policy 14 identifies the Penk and Sow Countryside Enhancement Area as an area which will be conserved and enhanced to provide a major nature conservation and recreational resource for Stafford and sets the council's intention to prepare a masterplan to improve the area's biodiversity and public access amongst other things. One of the priorities of the area is to provide links to surrounding communities, neighbourhoods and the wider recreational access network.
- 8.2 Some of the area identified is in private ownership and the policy provides no indication of how the desired enhancements will be delivered over the plan period. The policy as drafted is not effective.
- 8.3 The objectives of the policy are not without merit and could be delivered within the plan period alongside an element of housing on site we are promoting (STAFMB22). However, the policy as currently drafted is flawed and ineffective as enhancements are dependent upon private landowners. Engagement with the landowners is required to ensure that enhancements can be delivered which we welcome.



## 9 Policy 22 Canals

9.1 We object to criterion A. 3. iv which states:

*The character and attractiveness of the countryside is protected.*

9.2 This is inconsistent with the Framework which states that valued landscapes should be protected and enhanced. Criterion iv should be reworded to reflect the wording in the Framework as follows:

*The intrinsic character and beauty of the countryside is recognised.*

## 10 Policy 23 Affordable Housing

- 10.1 We have no specific objection to Policy 23 as to how it would apply to the HSL site. However, we refer back to our representations in respect of Policy 1 which set out that an increase in the housing requirement is needed in order to meet the identified need for affordable housing.
- 10.2 We do object to the failure of the Plan to meet affordable housing needs. Table 11.6 of the EHDNA sets out the affordable housing needs as set out below.

Table 11.6 Future Affordable Housing Needs by Sub-Area

Component	Rural East		Rural North		Rural West		Stafford		Stone	
	25%	33%	25%	33%	25%	33%	25%	33%	25%	33%
Newly forming households (Gross per annum)	74		158		149		535		136	
% unable to rent or buy in the private market	38.6%	25.7%	25.0%	15.6%	31.4%	20.1%	48.5%	33.7%	38.3%	25.0%
Newly forming households unable to afford market housing (per annum)	28	19	40	25	47	30	260	180	52	34
Existing households falling into need (annual average)	19		41		38		138		35	
<b>Estimate of Future Housing Need (p.a.)*</b>	<b>46</b>	<b>37</b>	<b>79</b>	<b>64</b>	<b>83</b>	<b>67</b>	<b>387</b>	<b>309</b>	<b>85</b>	<b>67</b>

- 10.3 The table shows that the vast majority of affordable housing need is in Stafford town, yet the Plan proposes 0% affordable housing policy on brownfield sites in Stafford town (which includes the Stafford Gateway allocation) and the SA raises concerns some sites are only marginally viable. Therefore, the affordable needs will not be met where they arise and affordability will worsen with this Plan if a choice of sites are not allocated that can viably deliver affordable housing.

## 11 Policy 32 Residential Amenity

11.1 We object to the following criteria:

- *Criterion 4. Overbearing impact/visual dominance.* There are no specified parameters of when a proposal would be considered to be overbearing and visually dominant. The criteria set out in 1-3 and 5 would ensure that there is no overbearing impact. Criterion 4 is vague, unnecessary and should be deleted.
- *Criterion 6: Impact resulting from loss of outlook.* This is not a valid material consideration in the consideration of a planning application and should be deleted.

## 12 Policy 34 Urban Design General Principles

- 12.1 We are generally supportive of Policy 34 in setting out key principles to guide urban design.
- 12.2 Paragraph 34.4 of the explanatory text states that a design review at an early stage will be encouraged for 'large and complex sites'. This reference is vague and for the avoidance of doubt, the text should be specific on the scale of development for which a design review is required.

## 13 Policy 41 Historic Environment

- 13.1 We object to Policy 41 as drafted for the following reasons.
- 13.2 First, it is assumed that the policy is intended to relate to designated heritage assets however, this is not clear and the policy should be amended to take this into account. The criteria for non-designated heritage assets would need to differ to designated assets and we consider that this should be covered by a separate policy.
- 13.3 Second, part B of the policy states:
- Development proposals shall preserve and where appropriate enhance the significance of heritage assets and their settings by being based on an understanding of the heritage interest, taking opportunities for sustainable re-use and achieving high design quality.*
- 13.4 Part B needs to be revised to distinguish between different types of heritage assets. For example, development proposals affecting a listed building must be considered in the context of the legal duty conferred by s16 (2) and s66 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990. Section 16 (2) relates to the grant of listed building consent and section 66(1) relates to the grant of planning permission. Section 66 (1) states:
- “In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”*
- 13.5 There is no mention in statute of enhancement of the building or its setting. The policy seeks to apply a higher test than is required in law, which is simply one of preservation.
- 13.6 Third, paragraphs 201 and 202 of the Framework allow for less than substantial or substantial harm to a heritage asset if it can be demonstrated that it is necessary to achieve public benefits (or substantial public benefits in the case of substantial harm). Policy 41 is not consistent with the Framework in this regard and should be redrafted to reflect paragraphs 201 and 202 of the Framework.

## 14 Policy 44 Landscapes

- 14.1 The wording of Policy 44 is not consistent with the Framework.
- 14.2 Paragraph 174 of the Framework states that planning policies should contribute to and enhance the natural and local environment by, amongst other things:
- a) *Protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan)*
  - b) *Recognizing the intrinsic character and beauty of the countryside and the wider benefits from natural capital and ecosystem services ...*
- 14.3 The Framework requires development proposals to recognise (not protect) the intrinsic character of the countryside unless it is a 'valued' landscape. This is not reflected in the policy as drafted and seeks to apply a higher test in respect of the countryside. Furthermore, criterion D in respect of 'tranquil' areas is vague and unclear. There is no definition of a 'tranquil' area or when a site is considered to either be relatively undisturbed from noise or recognised for its recreational and amenity value.

## 15 Policy 46 Green and Blue Infrastructure Network

- 15.1 We do not object to Policy 46 in principle but wish to make the following points.
- 15.2 First Part A of the policy states that the existing green and blue infrastructure network will be protected, enhanced and extended. It is not clear how the areas of green and blue infrastructure in private ownership will be enhanced without support from landowners. In order to enhance these areas we consider it necessary to bring forward development alongside the proposals in order to deliver this. As promoter of site STAFMB22, we have support from the landowners to achieve the objectives set out in the Vision & Delivery Statement (Appendix A) alongside some modest scale development. This would contribute to green infrastructure enhancements in the long term.
- 15.3 Second, Part A also states that the blue and green infrastructure network will be 'extended'. It is not clear from the policy whether extensions are proposed in addition to those shown on the proposals maps. In terms of extending the blue and green infrastructure, this must be supported by site specific assessments and field surveys to justify the designation of the land.

## 16 Policy 47 Biodiversity

- 16.1 Criterion B 3 of the policy requires a 30-year management plan to be submitted with any application. The requirement for a management plan to ensure the gain can be delivered in perpetuity can be secured by condition. There is no justification to require this to be provided upfront for outline planning applications.
- 16.2 Criterion F relates to sites of local importance including sites covered by a local designation such as Local Nature Reserves and Sites of Biological Importance and undesignated habitats such as natural watercourses, lakes and reservoirs. The policy does not account for the differentiation between sites depending on their position in the hierarchy and is overly restrictive in respect of non-designated sites.



## 17 Appendix 6 Housing land supply and trajectory

17.1 Policy 1 states that the annual requirement for the period 2020 – 2040 is 535 dwellings per year which equates to 10,700. Paragraph 1.7 states that the plan identifies or allocates sufficient land for approximately 12,580 homes. The flexibility allowance is some 17.5%, which is generally supported in principle. However, as we have assessed earlier, we have significant concerns on the delivery rates of:

- Meecebrook;
- Station Quarter, Stafford
- North of Stafford.

17.2 We comment on other housing allocations in Policy 12 as follows:

### Stafford West

17.3 The trajectory includes a significant increase from 150 dwellings per annum to 250 dwellings per annum for years 2026/27, 2027/28 and 2028/29 with 202 dwellings in 2029/30. The Lichfield Start to Finish report expects an average of 160 dwellings per annum from sites of 2,000 dwellings or more which is below the figures for Stafford West. There is no evidence as to why there is this significant increase and the trajectory should be revised downwards for this site.

### Land at Ashflats (STAFMB03) (capacity 268)

17.4 The SHELAA considers the site to be available, achievable and suitable. From our review of the site it is clear that it is landlocked by the rail line to the east, the M6 to the west and Ash Flats Lane to the north. The Plan states that the site can be accessed through the demolition of Lawford House but evidence of ownership is required. Lawford House and the proposed allocation was the subject of an application which was refused and dismissed at appeal in February 2014. Unlike the proposed allocation, Lawford House is not included in the red line so the access considered acceptable on appeal cannot be delivered as currently proposed. Given that Ash Flats Lane which is a narrow-unmarked road with no footpaths along its length to where it connects to Barn Bank Lane we consider this is also not a suitable alternative option. The SHELAA is silent on a suitable access for the 268 homes proposed and on the available evidence the site is not suitable and therefore undeliverable.

### Stafford Police Station (STAFMB12) (capacity 13)

17.5 The SHELAA considers the site to be available, achievable and suitable. From our review of the site the allocation is based on the relocation of the Police Station. However, no evidence is provided. From our research, the latest position in the Report to the Police Fire and Crime Panel dated 31st January 2022 is “Capital investment needed to support either site relocation or site redevelopment”. A figure of £500,000 is then set out for 22/23 and 23/24. Therefore, we question the availability of the site.

### Former Staffordshire University Campus (HOP03) (capacity 98)

- 17.6 The SHELAA considers the site to be available, achievable and suitable. From our review of the site the allocation is based on the site being available in the next 5 years. As the LPA will be aware, the most recent application was 22/35765/FUL for the change of use from student accommodation to asylum seeker accommodation. That application was refused and there is no evidence in the Plan that this site is available.

### MoD Site 4 (HOP08)

- 17.7 The SHELAA considers the site to be available, achievable and suitable. From our review of the site the allocation is based on the site being available in the next 5 years. The SHELAA states that the site is not developable as “The current user would need to be relocated to remove the constraint”. No timetable is provided and even if the site was to be made available, the site needs significant remediation.

### Conclusion

- 17.8 The Council’s housing land supply has been inflated on sites that are not deliverable or based on unrealistic delivery rates. We question whether the Council has even made contact with the landowner’s to scrutinise whether information provided remains up-to-date to support their allocation. Therefore, additional land is required and must be released. As we set out in the next section, the site HSL is promoting is a site that can deliver a green-infrastructure led scheme alongside up to 60 dwellings which would make an important contribution to the short-term housing need as well as delivering on key green-infrastructure and public benefits that the Plan seeks.

## 18 Proposed Omission Site

18.1 We set out below an overview of the site HSL is promoting for residential development at Radford Bank, Stafford. In the SHELAA the site is referenced STAFMB22. In the assessment the site was not considered suitable simply because “*the site is adjacent to a currently recognised Local Plan settlement but is designated as Green Infrastructure*”. The Site Selection Topic paper is flawed mainly because it excluded sites designated as Strategic Green Infrastructure without considering whether there are the opportunities that a site could deliver not only providing much needed new homes but significant ecological benefits through the creation of new habitats and wildlife corridors and not compromise the Strategic Green Infrastructure designation. Such a review of sites should have been undertaken and in fact the SHELAA itself stated:

*The presence of a suitability constraint on a SHELAA site does not necessarily render it automatically unsuitable. The assessment of suitability requires planning judgement to decide if the constraint is significant enough to make the site unsuitable. Some constraints, such as the presence of a Tree Preservation Order on site, can be factored into the design and would not prevent the site being developed.*

18.2 A consequence of this flawed starting point is that the SHELAA assessed the whole of the 5-hectare STAFMB22 site for some 150 dwellings, however the enclosed Vision and Delivery Statement sets out the context of the site and the design vision for a green infrastructure-led allocation with 60 homes on 4.86 hectares in a sustainable location whilst bringing a range of public benefits. Therefore, the only constraint in the SHELAA is addressed by this proposal and it should be reassessed in the Site Selection Paper and SHELAA on that basis.

18.3 HSL are engaging with key stakeholders such as The Wildlife Trust and Staffordshire Highways to ensure further robust evidence can be provided as the Plan progresses. We would also welcome meeting with officers to discuss the site merits as we consider the site can deliver many of the objectives stated in the Plan.

18.4 To summarise the Vision and Delivery Statement:

- Over 58% of the site dedicated to open space, green and blue infrastructure enhancements, equivalent to 2.86 hectares, with new tree planting, ecological corridors and natural equipped children’s play areas;
- Mitigation and significant enhancements to biodiversity to provide a net gain with long-term management;
- Provision of new ponds and wetland habitats for birds and other wildlife;
- A new safe and suitable vehicular access point off Radford Bank with 5.5m road and 2m footways on each side;
- An orbital walking route within the site for dog walking and short strolls to provide a suitable local recreational route away from the SAC;
- A residential development comprising approximately 60 dwellings satisfying local housing needs and supporting economic aspirations;
- An overall net development area of approximately 2.0 hectares, equating to an average moderate density of around 30 dwellings per net hectare;

- A balanced range of housing comprising a mix of types and sizes;
- Affordable housing provision on-site, in line with the requirements of local planning policy and in an area with high demand;
- Provision of sustainable drainage systems which also provide blue infrastructure for wildlife.

18.5 Given our representations to Policy 1 and the delivery of allocated site, then we consider the Plan needs to allocate more land and this site, in a Tier 1 location, should be allocated for 60 dwellings including its green infrastructure and public benefits.

## **Appendix A      Vision & Delivery Statement**



# Radford Bank Stafford

## Vision & Delivery Statement

*A green infrastructure-led approach*

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Site Context with Settlement Boundary



# INTRODUCTION

# 1.0 Introduction

**This Vision and Delivery Statement has been prepared by Hollins Strategic Land and relates to a parcel of land south of Radford Bank in Stafford (“the site”). It has been prepared to support the promotion of the site for a green infrastructure-led residential development and demonstrates that the site is in a very sustainable location on the edge of the Stafford boundary and should be identified as a residential allocation for early delivery in the Stafford Local Plan (2020-40).**

**1.1** The context and background to this submission relates to the emerging Stafford Local Plan which has reached Preferred Options stage and is being consulted from 24 October 2022 to 12 December 2022. The proposed requirement to deliver a minimum of 10,700 new homes (535 per year) in the period 2020-2040 is identified and a strategy is set out for how this level of development is to be achieved. The majority (59%) of this requirement is to be met in and around Stafford town.

**1.2** There is a need, therefore, for new housing sites to be identified by new Local Plan and a clear need to ensure deliverable sites can make a meaningful contribution to housing delivery.

**1.3** The site extends to 4.86 hectares (12 acres). The site is currently undeveloped and is considered suitable for the delivery of green infrastructure and ecological enhancements on more than half of the site, alongside 60 dwellings.

**1.4** Radford Bank runs adjacent to the

northern boundary with a large residential area beyond. Ripon Drive and a cycleway delineates the eastern boundary with an established residential area beyond which influences the character of the site. The Stafford Settlement Boundary, as adopted, lies adjacent to the site to the north and east. A large wooded area lies to the south of the site with Wildwood Park beyond. Staffordshire and Worcestershire Canal abuts the western boundary. The physical characteristics of the site including the wooded areas to the south and west, which have grown and matured over the years, make it relatively well-contained visually and physically.

**1.5** The scale of green infrastructure and ecological improvements alongside some residential development (60 dwellings) would make an excellent contribution as a small/medium sized site which the NPPF states can make an important contribution to meeting the housing requirement of an area and are often built-out relatively quickly. Whilst the site is a medium-sized site which can be built-out quickly and which the NPPF considers is important to meeting housing needs.

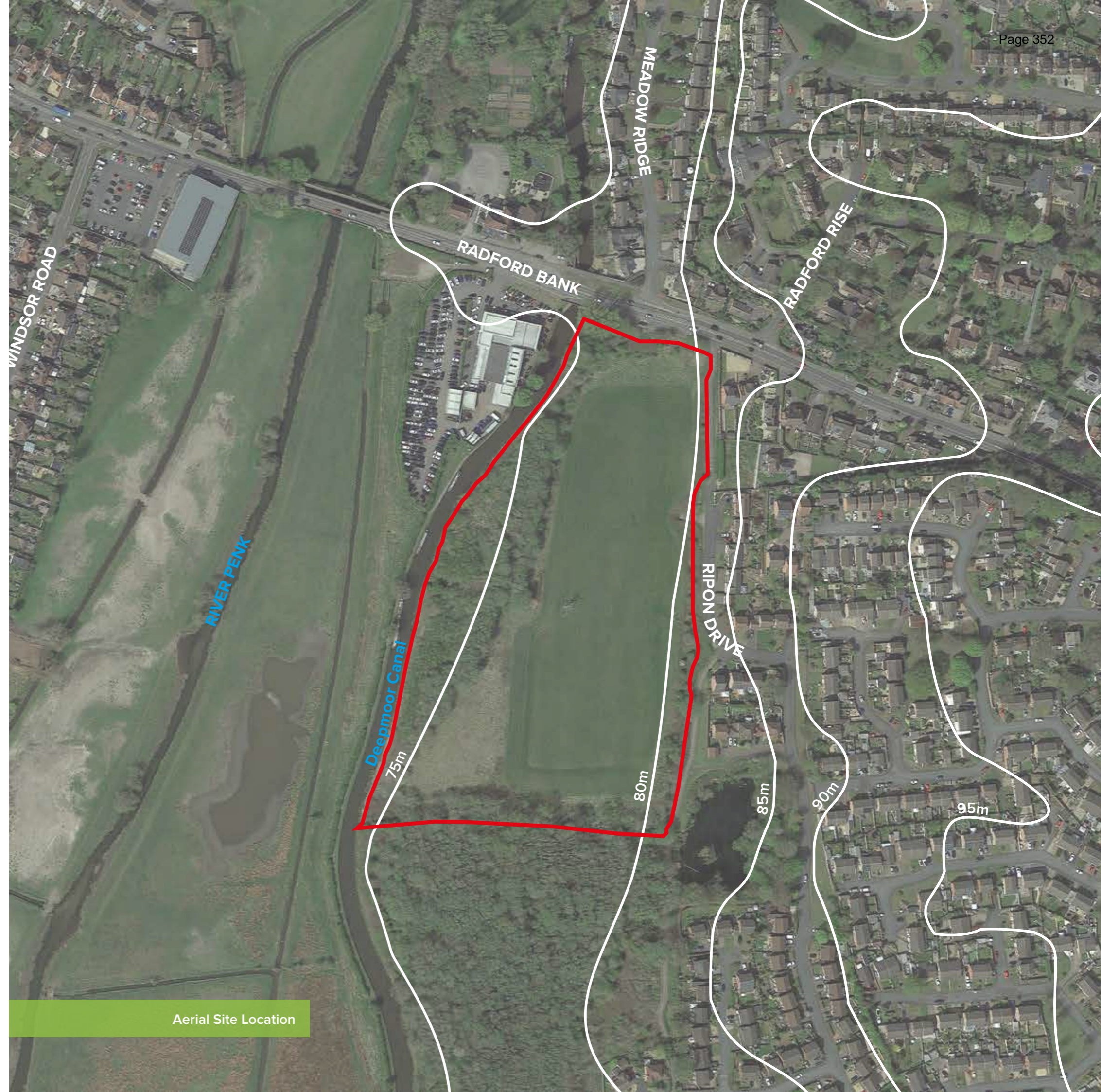
**1.6** Taking into account factors such as topography and other technical considerations such as ecology, heritage, landscape and arboriculture, it is anticipated that the site is capable of delivering around 60 homes with open space, green infrastructure and ecological benefits.

**1.7** HSL have undertaken initial survey work and due diligence and have fully considering any constraints and opportunities presented by the site as a whole. An overview of the

key technical considerations to-date is also provided, which helps to demonstrate that the site is available, suitable, achievable and can therefore is capable of being considered deliverable.

**1.8** HSL intend to work collaboratively with local stakeholders to deliver a sensitive scheme, including the community, Staffordshire Wildlife Trust, Highway Authority, and Canals and River Trust. Comments made on a historic planning application on the site have helped inform the proposed scheme.

**The site is well placed to contribute towards meeting future housing needs in Stafford which aligns strongly with the Council’s emerging strategy in the Preferred Options Local Plan 2040.**



Aerial Site Location

# TRACK RECORD

## 2.0 Hollins Track Record

**HSL, as one of the leading land promoters in strategic land, has a demonstrable track record in securing planning permissions on all our sites with 100% of all consented sites delivering homes. HSL was founded in 2007 and aims to help bring forward sustainable and deliverable sites. Recently, HSL has secured over 10 planning permissions for over 700 dwellings; many have already been sold to national and regional housebuilders, or built out by our SME sister house-building company Hollins Homes.**

**2.1** HSL work on behalf of a wide range of landowners including private individuals, charities, trusts and Government estate departments, promoting land through the planning system to secure housing allocations and planning permissions for residential development. We then manage the sale of the site from the landowner to the housebuilder who then build out the site and deliver homes. HSL has a sister company, Hollins Homes, who build high quality developments.

**2.2** HSL has an in-house project management team who are qualified planners with a collective planning experience of over 60 years. This helps to give HSL the edge in understanding the planning system and the issues associated with a wide and diverse range of projects without relying heavily on outside professional advice. It means that sites we are involved in have a sensible planning strategy 'baked-in' from the very early stages which helps avoid an adversarial approach. Blended with commercial acumen results in HSL actually ensuring delivery of homes on the ground.

**2.3** The table opposite provides examples of HSL sites with outline consent which are completed or under construction. It takes on average around 6-12 months to submit a reserved matters (RM) application from outline consent, but in some instances less than 5 months. On average, more recently, building is starting within 2 years from outline consent depending on the scale and complexities of the site.

**2.4** In addition, HSL can contractually or legally oblige housebuilders to submit RM much quicker than would normally be the case if the housebuilder gained the outline consent themselves. This can be for several reasons: open marketing is a much more competitive process and performance is key as well as landowners seeking a return sooner.

**2.5** It is in HSL's interest to have reserved matters submitted as quickly as possible, either ourselves through our sister company Hollins Homes or by contractual arrangement with a chosen housebuilder. HSL will also oversee and input our expertise into any RM application so the process is smoother and faster. This is a benefit of the sites we are promoting, particularly in instances where deliverability of a site quickly is preferred by the Council.

### Recent Land Market Transaction Timescales

**2.6** Recent land transactions made by HSL during 2020 up to December 2022 indicate that there is a clear appetite for sites with deliverable outline consents, particularly in locations with pent up demand for new homes.

Over the last two years it has taken between three and six months from outline consent to securing a preferred house builder. HSL's expertise ensures that marketing a site from outline stage is not necessarily a drawn-out process and relatively quick timescales can be achieved with the right site and a deliverable consent in place.

**In summary, HSL is a key facilitator of sustainable sites which can be delivered quickly and therefore its approach can boost housing supply in sustainable locations where housing need is greatest.**

Table of HSL Track Record of Delivery

SITE	HOUSEBUILDER	STATUS	OUTLINE CONSENT	RESERVED MATTERS SUBMITTED	BUILD START
Adderbury, Oxfordshire (40 dwellings)	Hayfield Homes	RM pending	10/09/21	30/03/22	MAR '23
Forton, Lancashire (173 dwellings)	Persimmon	RM pending	10/05/18	15/07/22	SPRING '23
Melksham, Wiltshire (144 dwellings)	Barratt	Under construction	10/09/21	04/04/22	APR '23
Staveley, Derbyshire (400 dwellings)	Barratt / David Wilson	Under construction	28/08/20	28/07/21	NOV '22
Poulton-le-Fylde, Lancashire (130)	Seddon Homes	Under construction	01/04/20	07/04/20	JUN '22
Bodicote, Oxfordshire (46 dwellings)	Greensquare	Under construction	30/10/19	15/06/21	SEP '22
Loveclough, Lancashire (80 dwellings)	Hollins Homes	Under construction	17/05/19	19/08/20	MAR '21
Mistley, Essex (67 dwellings)	CALA Homes	Under construction	12/04/19	24/01/20	AUG '20
Galgate, Lancashire (67 dwellings)	Hollins Homes	Under construction	27/02/19	23/08/19	DEC '21
Westhoughton, Lancashire (58 dwellings)	Hollins Homes	Under construction	30/10/18	05/08/19	APR '20
Broughton, Lancashire (97 dwellings)	Watkin Jones	Under construction	03/04/18	12/08/19	JAN '20
Chippenham, Wiltshire (72 dwellings)	Wainhomes	Under construction	09/03/18	03/01/19	AUG '20
Kirkham, Lancashire (170 dwellings)	Story Homes	Under construction	23/01/17	6/3/19	JUL '19
Newton-with-Scales, Lancashire (50)	Hollins Homes	Completed	18/08/17	13/12/17	JUN '19
Calne, Wiltshire (83 dwellings)	David Wilson Homes	Completed	04/7/16	8/7/17	JUN '18
Blackrod, Lancashire (110 dwellings)	Rowland Homes	Completed	26/4/16	19/12/16	NOV '17
Bramley, Hampshire (65 dwellings)	Taylor Wimpey	Completed	25/5/16	05/02/18	SEP '18
Farnsfield, Nottinghamshire (48 dwellings)	Bellway	Completed	12/4/16	24/2/17	DEC '17
Preston, Lancashire (48 dwellings)	Jones Homes	Completed	02/10/15	03/01/17	OCT '17
Whitchurch, Shropshire (57 dwellings)	Hollins Homes	Completed	17/12/14	10/12/15	APR '18
Garstang, Lancashire (130 dwellings)	Barratt	Completed	11/12/14	11/08/15	DEC '16
Shepshed, Leicestershire (270 dwellings)	Persimmon	Completed	07/11/14	12/04/17	OCT '17
Northwich, Cheshire (74 dwellings)	Stewart Milne	Completed	23/10/13	03/11/14	NOV '17
Barton, Lancashire (65 dwellings)	Rowland Homes	Completed	13/7/13	05/12/13	OCT '14
North of Eastway, Preston (140 dwellings)	Barratt	Completed	13/03/14	10/06/16	JUL '17
Eastway, Fulwood, Preston (22 dwellings)	Hollins Homes	Completed	05/12/13	29/10/14	JAN '16
Preston, Lancashire (70 dwellings)	Charles Church	Completed	27/10/11	06/07/12	APR '14
Alsager, Cheshire (65 dwellings)	Miller Homes	Completed	18/01/13	28/3/13	MAY '15
Wheelock, Cheshire (41 dwellings)	Taylor Wimpey	Completed	23/04/10	14/06/10	MAR '11
Hesketh Bank, Lancashire (35 dwellings)	Rowland Homes	Completed	20/12/11	13/02/12	APR '12
Chorley, Lancashire (75 dwellings)	Bellway	Completed	13/10/10	21/11/11	MAY '12

# SUSTAINABLE LOCATION

## 3.0 Sustainable Location

The site is in a highly sustainable location, with easy access to an excellent range of public transport and local services and facilities without the need for significant new built infrastructure as with new settlements. Even if private cars are used, commuting distances are reduced due to the site's location close to jobs, services and facilities.

### The Site

**3.1** The site is well-positioned to the east of Stafford on the west side of Weeping Cross. The site measures 4.86 hectares (12 acres), and, topographically, is flat and slopes gently downwards towards the west. The eastern boundary of the site is the highest point at approximately 80m AOD and falls gently to approximately 75m AOD at the west of the site.

**3.2** The site lies adjacent to the urban settlement boundary with existing development located to the north and east. A footpath and cycleway runs along the eastern edge of the site connecting the site to the wider pedestrian network. The whole site is well-enclosed and bordered to the west and south by mature woodland trees and shrubs. This has matured significantly over the past decade. The canal physically bounds the site to the west.

### Surrounding Area

**3.3** The site is located within the Stafford urban area which is the borough's principal town. Stafford is the largest and most sustainable settlement in the borough with key

employment located here. The site has a close relationship to the main town which assists with maximising access to services and reducing the need to travel. Supporting and enhancing access to services and facilities is important to achieving sustainable development in the borough.

**3.4** The emerging Local Plan recognises the need to locate more development in locations which are or can be made accessible by a range of transport mode. The site being within the highest tier of settlements is considered the most accessible location in the borough where most facilities and services are located and the existing population is concentrated.

**3.5** Stafford town has an existing population of around 70,145 people (Census 2021). The population recorded in 2011 was 68,472 with 62,440 recorded in 2001. This shows a significant reduction in population growth in the urban area (from +9.7% to +2.4%) despite growth across the borough of +4.5% from 130,900 in 2011 to 136,800 in 2021. The borough's population grew slower than the West Midlands (6.2%) and England (6.6%) overall. Part of this is likely caused by a lack of housing within or close to the town which has a knock-on effect in increasing longer commuting patterns outside the town.

**3.6** The emerging Local Plan recognises that an increase in the number of people living in the town centre will "support a vibrant economy, ensure the efficient use of land and deliver sustainable communities going forward".

### Education

**3.7** There are several primary and secondary schools within walking distance nearby which currently have capacity (as published November 2022), including St Anne's Catholic Primary, Barnfields Primary, Silkmore Primary Academy, St Leonard's Primary, Flash Ley Primary, St Austin's Catholic Primary and Stafford Manor High School.

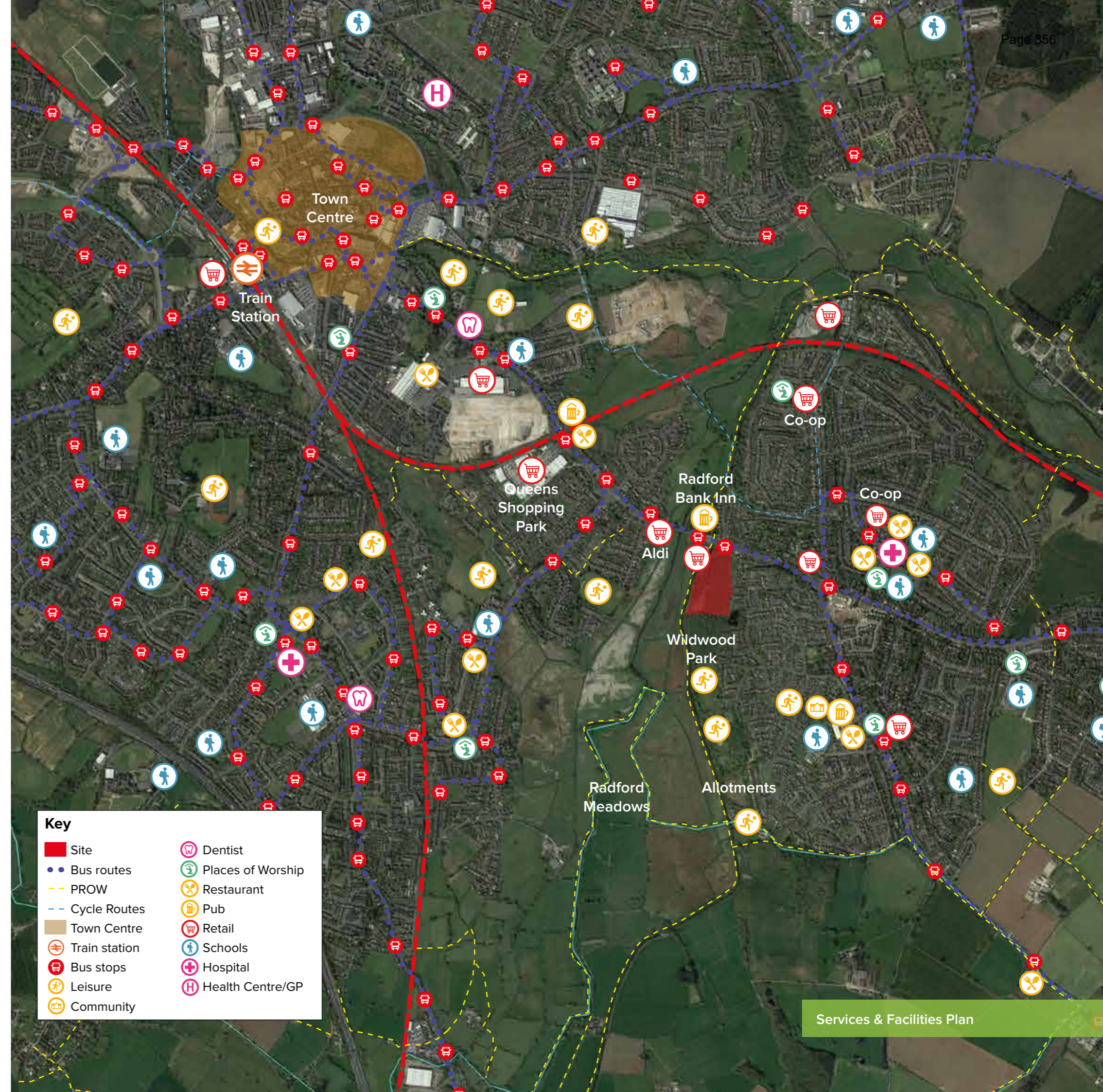
**3.8** The small number of additional pupils arising from the proposed scheme across 60 dwellings could be met within existing capacity in nearby schools or via a financial contribution towards the expansion of an appropriate school.

### Healthcare

**3.9** There are a range of healthcare facilities within walking distance or via bus nearby including Weeping Cross Health Centre, Wildwood Seven Day Pharmacy, Smile Style Dental Care, Wolverhampton Road Surgery and the County Hospital.

### Retail

**3.10** There are a wide range of retail nearby, some supermarkets within easy walking distance of the site, including Weeping Cross Co-op, Farndown Road Co-op and Aldi.



## Sports and Recreation

**3.11** The site has easy access to a range of sport and recreation facilities including Wildwood Park with footpath pitches and skate park, Brocton Football Club, Silkmore Park, Radford Meadows and Stafford Boat Club.

**3.12** The site is located within a wider area where high quality, publicly accessible green open spaces and walking routes are already in existence which helps ensure healthy sustainable communities.

## Food & Leisure

**3.13** The surrounding area caters for an excellent range of food and leisure opportunities including The Radford Bank Inn Stonehouse, Wildwood Community Centre, The Wildwood Grill and Bod Cafe Bar. There are also several places of worship including St Anne’s Roman Catholic Church, Holy Trinity Church and Church of Jesus Christ.

## Transport and Local Connections

**3.14** The site also benefits from excellent regular bus services with the closest bus stops located on Radford Bank immediately adjacent to the site. These are served by the number 74 Chaserider bus service which connect the site to Stafford centre and Cannock. The number 826 Chaserider connects the site to Stafford town, Rugeley and Lichfield. These services typically provides two services per hour Monday to Friday between approximately 05:44 and 19:44. Saturday services are less

frequent with buses running every hour from 06:24 to 19:44.

**3.15** Stafford Railway Station is located approximately 2.4km west of the site and is linked to the site via bus routes 74 or 826. The total journey time from the site is 16 minutes and as such provides a realistic opportunity for residents of the proposed site to make a linked sustainable trip.

### Local Amenities Table

	Schools	Distance (km)
1	Leasowes Primary	1.4
2	Barnfields Primary	1.2
3	St Anne’s Catholic Primary	0.9
4	Walton High School	1.8
5	Oakridge Primary	1.7
6	Silkmore Primary Academy	1.9
Healthcare		
6	Weeping Cross Health Centre	0.8
7	Wolverhampton Road Surgery	2.2
8	Smile Dental Care	1.8
Retail		
9	Aldi	0.4
10	Weeping Cross Co-op	1.1
11	Farmdown Road Co-op	1.2
12	M. Mottershead Butchers	1.0
Transport		
13	Bus stops on Radford Bank	0.1
14	Stafford Train Station	2.4

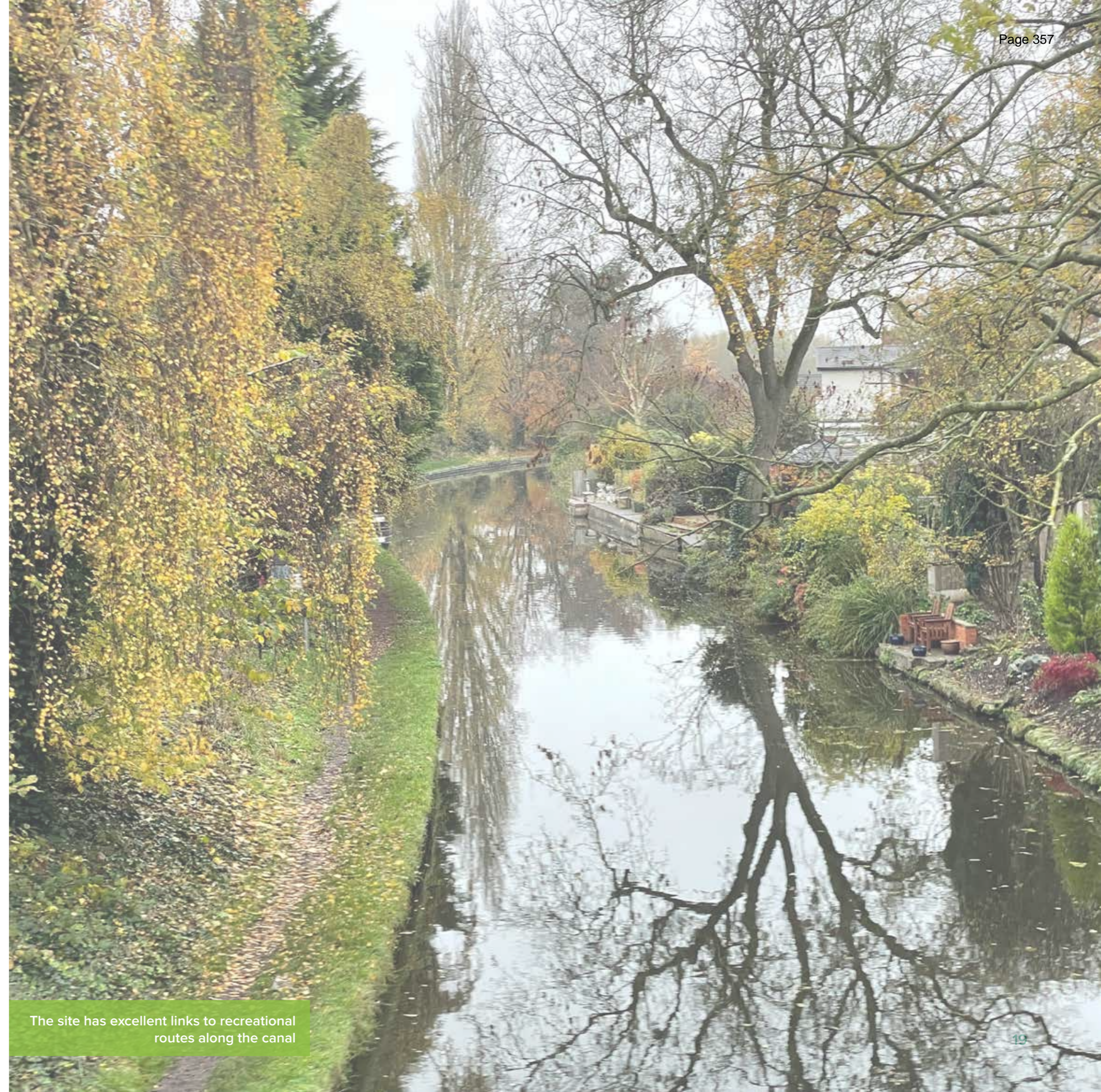
### Bus Services

Service	Route	Daytime	Evening	Sat
74	Stafford - Cannock	Every 30 mins	4 journeys	Every 60 mins
826	Stafford - Rugeley - Lichfield	Every 30 mins	2 journeys	Every 60 mins

**3.16** Stafford Station provides direct and frequent services to Birmingham, Manchester and London.

**The site’s highly sustainable location make it an ideal logical location for some housing growth. There is an opportunity to provide a sustainable development that meets borough-wide and local housing needs and supports the local economy.**

	Places of Worship	Distance (km)
15	St Anne’s Roman Catholic	0.8
16	Church of Jesus Christ	1.1
17	Holy Trinity Church	1.2
Food & Leisure		
18	Radford Bank Inn Stonehouse	0.2
19	Wildwood Park	0.6
20	Wildwood Skate park	1.3
21	Stafford Boat Club	1.4
22	Wildwood Allotments	1.2
23	Radford Meadows	1.1
24	Brocton Football Club	1.3
25	Wildwood Community Centre	1.1
26	Bod Cafe Bar	1.0
27	Falmouth Ave Play Area	1.7
28	Queens Shopping Park	1.2
29	B&Q Stafford	1.7
30	Spittal Brook Pub	1.2



The site has excellent links to recreational routes along the canal

DELIVERABILITY



## 4.0 Deliverability

### Available

**4.1** The entire site has previously been submitted through the Stafford Call for Sites process (Site STAFMB22). HSL have a long term agreement with the landowners to promote the site for development and intend to continue promoting the site as a residential allocation through the preparation and examination of the Stafford Local Plan 2040.

**4.2** HSL have a proven track record of facilitating the delivery of high quality developments on suitable and sustainable sites and can confirm that there are no insurmountable technical issues, the green infrastructure enhancements and modest housing development can be delivered within the early period of the Stafford Local Plan 2040. The site is therefore confirmed as being deliverable.

### Suitable

**4.3** It is demonstrated in this document that the site is in a highly sustainable location, well related to the existing Stafford urban area.

**4.4** Stafford town area in which the site is located is the most sustainable location to accommodate growth in the borough being at the top of the settlement hierarchy. The site compares very well to the constraints and issues facing other areas of land around the borough, and their distance from services, facilities and jobs in Stafford town. In light of the specific opportunities and benefits afforded by the proposed vision on this site, not least the delivery of new enhanced publicly

accessible green infrastructure and biodiversity improvements immediately adjacent to the urban area boundary.

**4.5** This section is informed by technical work undertaken in relation to the site, as well as information from the previous planning application, and demonstrates there are no physical characteristics or legal constraints that would prevent a modest housing scheme with green infrastructure improvements being delivered at the site.

**4.6** The site is therefore confirmed as being suitable for housing.

### Achievable

**4.7** HSLs professional team have assessed the physical characteristics of the site along with any other technical considerations and can confirm that development of the site is commercially viable, even taking account of a policy compliant proportion of affordable housing as well as the green infrastructure improvements proposed. HSL are confident that when taking all known factors into account the site could be developed for approximately 60 dwellings in a manner which would be sensitive and appropriate to its setting with a moderate density in character with the existing settlement edge. The following is a summary of the technical factors associated with development of the site.

### Arboriculture

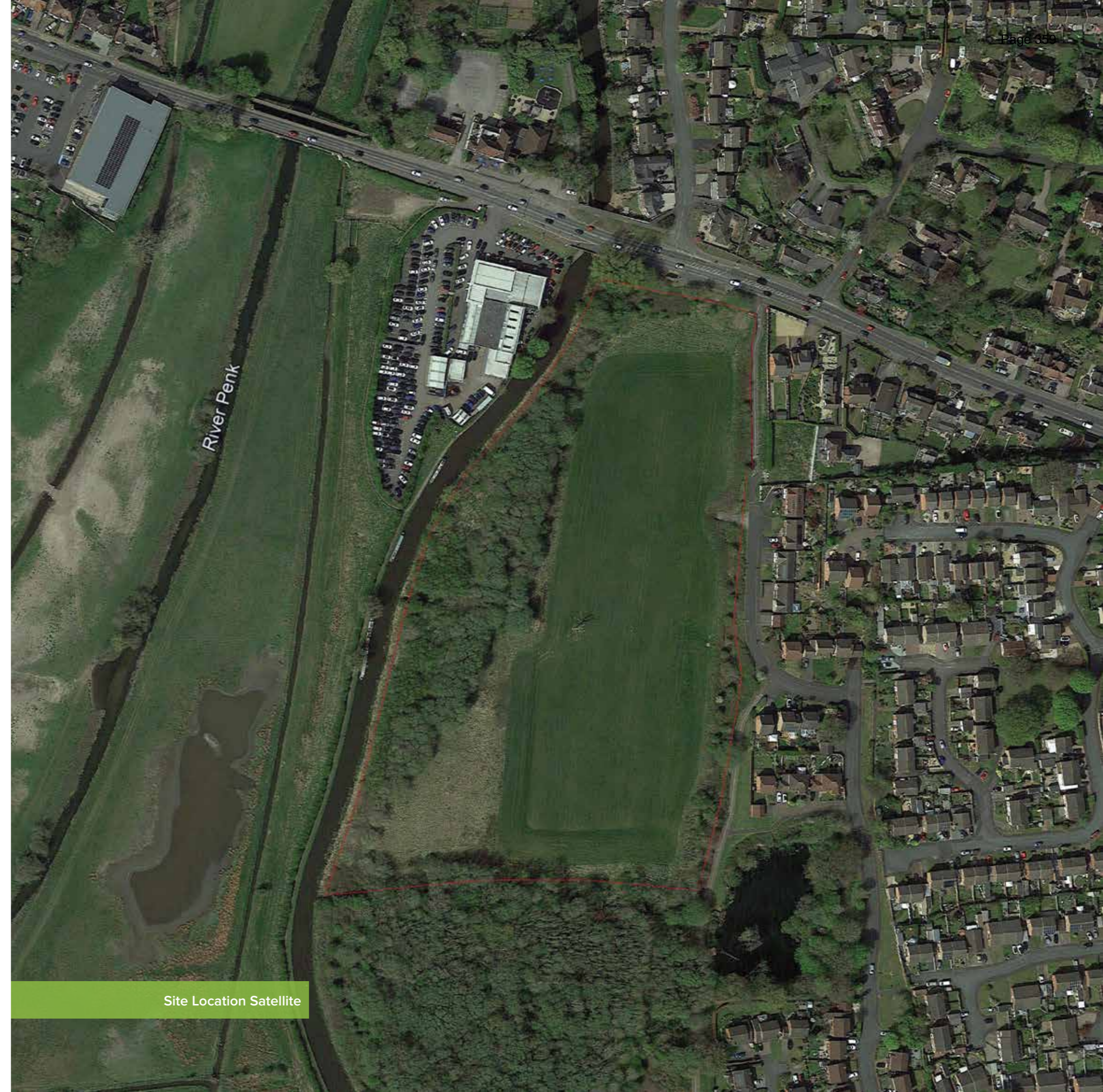
**4.8** The site itself contains one standalone mature tree, an ash, and areas of scrub to most boundaries. The biggest feature is the plantation of predominantly goat willow adjacent to the canal which has matured and extended over the past decade. To the south of the site there is an extensive area of woodland which has encroached into the site boundaries due to fallen trees and pioneer species developing. Goat willow is the predominant species. Some Whitebeam species tree and scrub are located along the northern boundary within the adopted highway. Some areas of hawthorn scrub are also located along the eastern boundary.

**4.9** In arboricultural terms the site is deemed suitable for development. Further information in this document is provided under Green Infrastructure.

### Ground

**4.10** The 1:50,000 British Geological Survey (BGS) map shows the site is underlain by superficial deposits of sand and gravel. The solid geology underlying the western portion of the site is the Stafford Halite Member (halite-stone and mudstone). The solid geology in the eastern portion of the site is the Mercia Mudstone Group (mudstone and halite-stone).

**4.11** There may be likely potential for sustainable soakaway drainage solutions which will be confirmed at detailed design stage.



Site Location Satellite

## Archaeology

**4.12** Professional assessment work undertaken appraised the potential for archaeological remains within 1km radius of the site based on information held at the Staffordshire Historic Environment Record (HER) and Stafford Records Office.

**4.13** The potential for undesignated remains of truncated ridge and furrow cultivation is not visible on the ground and in any event is considered very low potential due to farming earthwork as confirmed by lidar imagery undertaken by the Environment Agency.

**4.14** Staffordshire County Council Environmental Specialist Team (Historic Environment) previously commented that archaeological mitigation was unnecessary on the site due its location in the agricultural hinterland and the general lack of undesignated archaeological remains recorded on the Historical Remains Record.



EA Lidar Mapping

## Conservation

**4.15** Due to the significant screening created by the mature vegetation along the western and southern boundaries of the site, the development of the site would have negligible change to the setting of the Staffordshire and Worcestershire Canal Conservation Area, the Grade II Listed Radford Bridge and the Grade II - Staffordshire and Worcestershire Canal Meadow Canal Bridge No.99. It will also result in a negligible change to the setting of the undesignated post-medieval water meadows at Radford.

**4.16** The site lies immediately to the east of the Staffordshire and Worcestershire Canal Conservation Area. As the proposals are to maintain and significantly enhance the woodland trees on-site in the long term, in that a buffer of up to 90m will be provided along the western boundary (and 58% open space), special and sensitive regard is given so that the appearance and character of these assets will be preserved and enhanced. There is an opportunity to provide new public access close to the canal edge, with seating and interpretation boards so that views of the conservation area and Radford Meadows can be appreciated. This is also a heritage benefit.

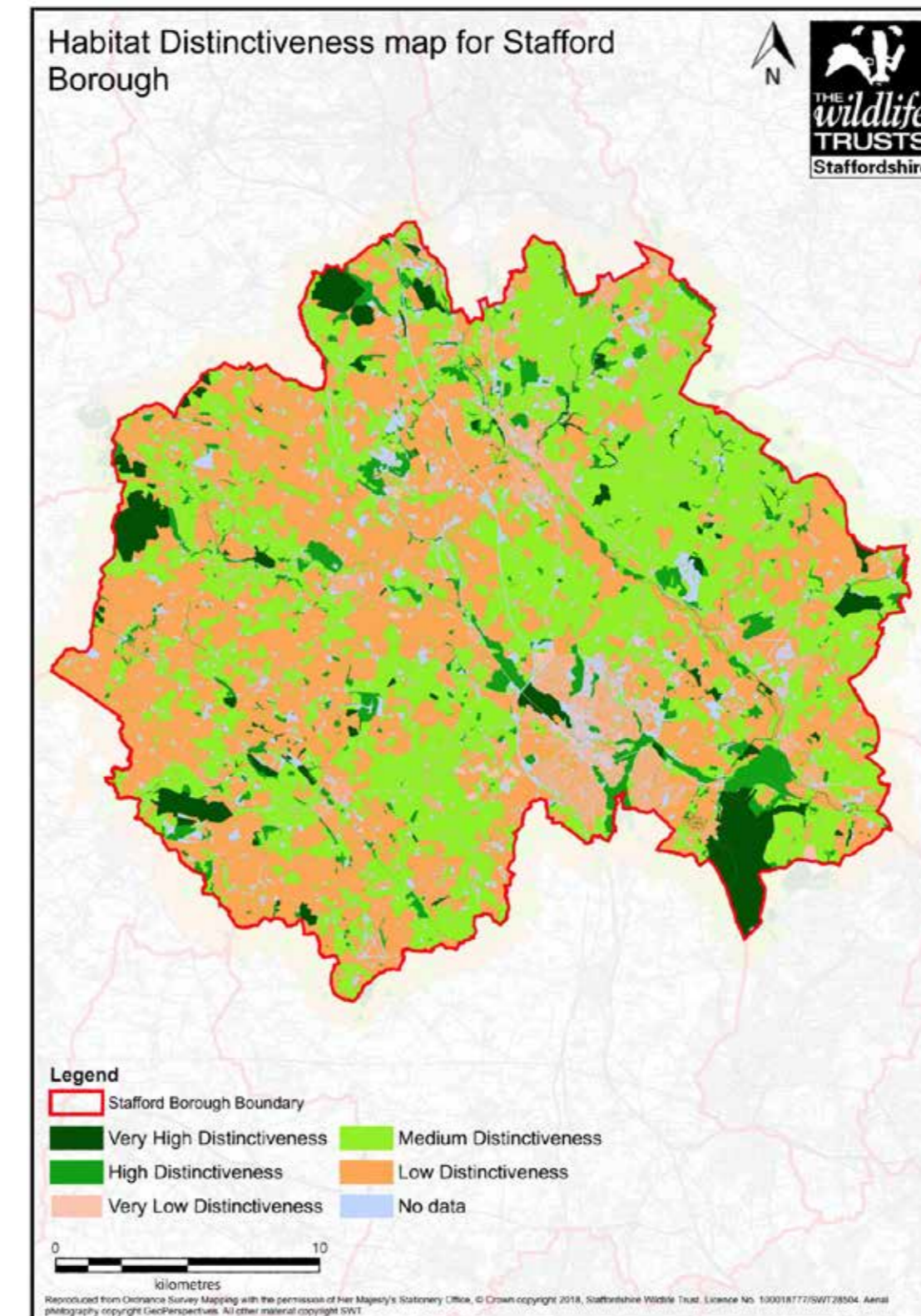
## Biodiversity

**4.17** The site has no statutory or non-statutory designation for nature conservation. Ecological survey assessment confirms the site is of low ecological value. The site is arable farmland habitat which constitutes the majority of the site and is not an ideal environment for wildlife with low nature conservation value. Boundary hedgerows and vegetation on the southern and eastern boundaries have moderate local nature conservation value, offering foraging and shelter for a wide range of birds and mammals as well as representing important local wildlife corridors.

**4.18** The Wildlife Trust 'Stafford Borough Nature Recovery Network Mapping' report (2019) assessed land across the borough to understand areas of biodiversity value and areas which are a priority for protection. The site is assessed as having 'medium' habitat distinctiveness compared with Radford Meadows to the west being 'high' habitat distinctiveness. The report recognises that low and medium distinctiveness habitats could be restored to a higher quality habitat. Indeed, some proposed allocations in the Local Plan 2040 are classed as having at least medium habitat distinctiveness.

**4.19** The site also lies within a 'Grassland Opportunity Area' and a 'Wetland Opportunity Area' with some specific opportunities being:

- Enhancement of any existing grassland to create diversity and ensure future management persists;
- Targeting and prioritising further wetland creation and enhancements connected to other watercourses;
- Provide additional wetland habitats



Extract from The Wildlife Trust 'Stafford Borough Nature Recovery Network Mapping' report (2019)

suitable for a range of species;

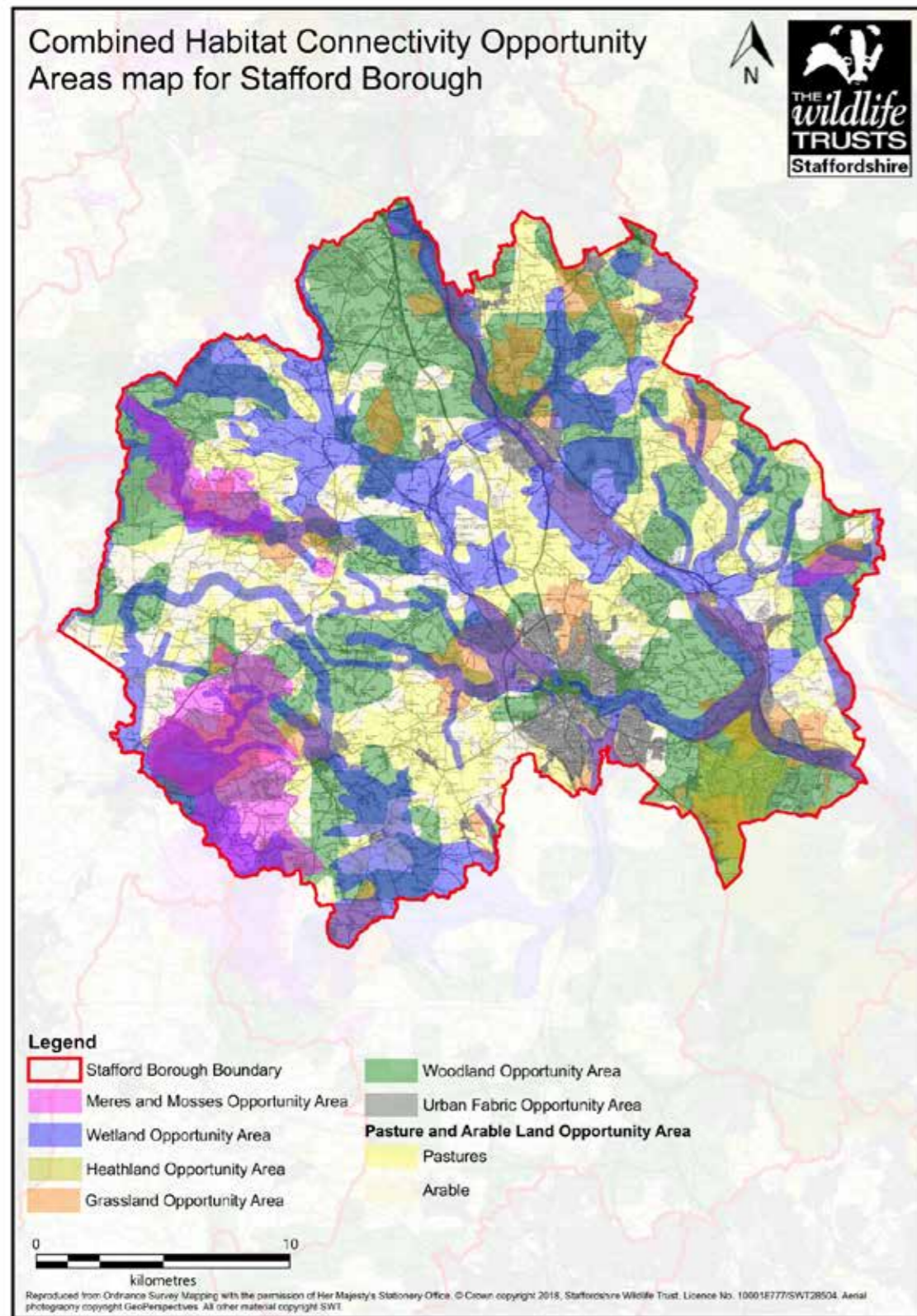
- Recreational and aesthetic benefits;
- Flood and drainage mitigation.

**4.20** The hedgerows and woodland trees should be retained and managed appropriately post development. The development of this current agricultural site will offer opportunities to incorporate wildlife friendly landscaping and features which will increase its future nature conservation value.

**4.21** There are opportunities to provide new wetland habitats on the site with marshy land and deep linear ponds and drains. This will also help to deter too much direct access by the public and pets from the site to the wider local wildlife site.

**4.22** There are also significant opportunities for a habitat and landscape scheme to be designed to positively respond to the targets in the Stafford Borough Biodiversity Action Plan. The site falls within the 'Urban Ecosystem' in the Staffordshire BAP. It notes that the continually expanded population has meant that sustainable development of urban areas is crucial to maintaining, and improving, the level of biodiversity in each area. Not only will this be important for biodiversity itself, but it also provides a direct link for the public to enjoy nature and improve the overall quality of life. Urban areas of high biodiversity will benefit from environmental and economic benefits such as cleaner air and more recreational activities. The objectives include:

- Creation of broadleaved woodland;
- Creation of high quality pond sites;
- Maintain extent of hedgerows, including individual, isolated hedgerow trees and



Extract from The Wildlife Trust 'Stafford Borough Nature Recovery Network Mapping' report (2019)

isolated veteran trees;

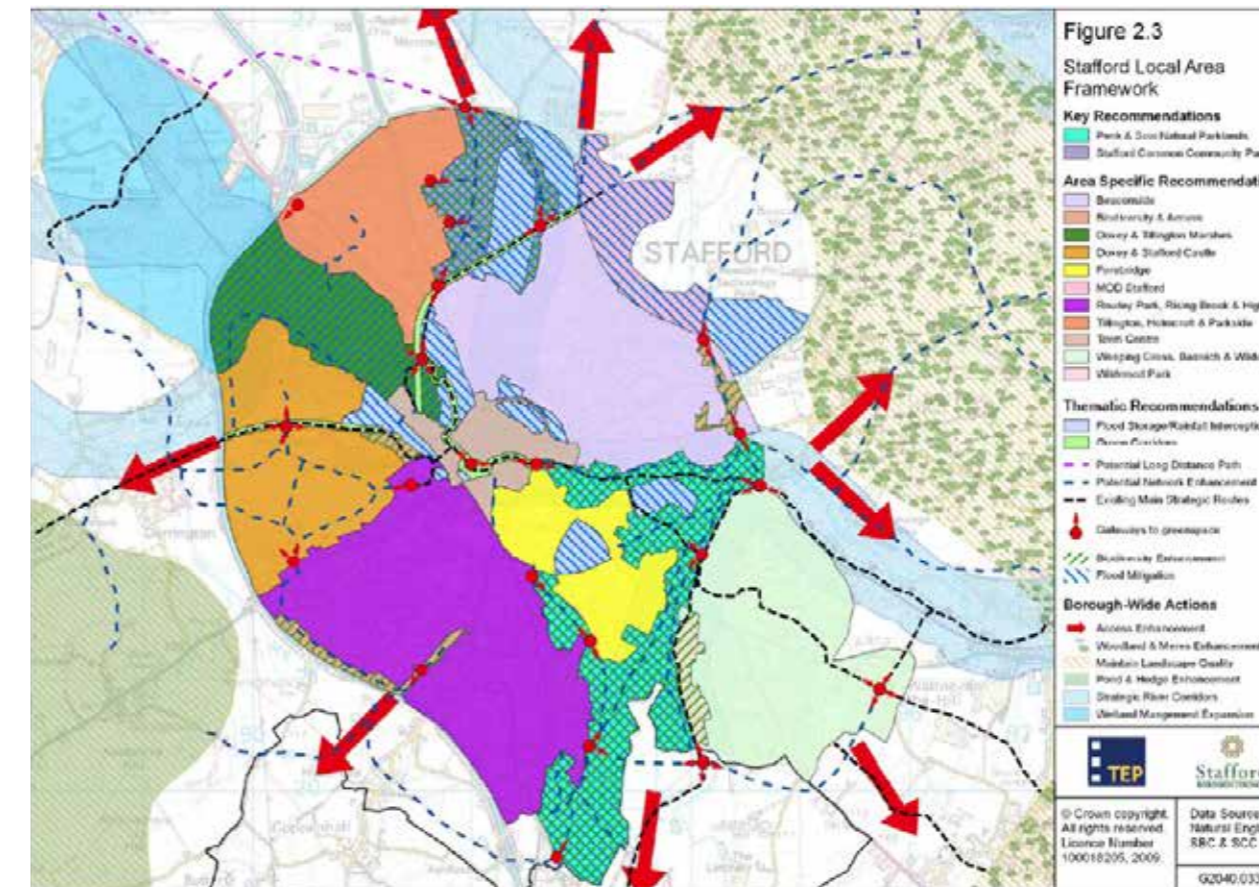
- Create and achieve a net increase in the length of hedgerows;
- Provide semi-natural habitats within and around urban areas;
- Ensure development is sustainable by providing permeable corridors through which wildlife can move.

**4.23** The site can assist with meeting many of these objectives.

**4.24** New publicly accessible green spaces can be provided to create an alternative area for recreation and avoid impacts to the SAC. The majority of the site can be provided for open space with green and blue infrastructure enhancements on more than 58% of the site, equivalent to 2.86 hectares.

**4.25** It is concluded that development can be achieved at the site whilst conserving the hedgerows and trees and other features of ecological interest, particularly the habitat connectivity function of the hedgerows and trees. Development proposals provides an opportunity to secure and implement a significant net gain in biodiversity and green infrastructure at the site.

**4.26** Incorporation of opportunities for biodiversity within the built environment is entirely feasible by habitat creation and a landscape planting strategy and will be secured and delivered by a 'Biodiversity Enhancement Strategy and Long-term Management Plan'.



Stafford Town GI Local Area Framework

## Green Infrastructure

**4.27** Enhancing the green network will increase its conservation value alongside informal recreation. Ensuring the continuity of existing green linkages to ensure they are not severed is important. The retention and enhancement of the woodland belt along the west and south of the site as part of the green infrastructure proposals is considered feasible.

**4.28** The emerging proposals demonstrate how development can be designed to utilise the existing tree cover on the site to create a scheme that offers a high quality landscape setting with maturity. The additional tree planting as part of a soft-landscaping scheme will provide a net gain in the sites tree cover and overall arboricultural betterment.

**4.29** As part of the proposals there is an opportunity to contribute towards the Stafford Green Infrastructure Network, in particular the 'Strategic Open Space Action Area' and 'Strategic Watercourse Corridor' area (shown above). The objectives are:

- Flood and drainage management such as storage will reduce run-off rates and has the added benefit of supporting wildlife and public access to create multifunctional corridors and community asset, linking communities with the wider green space network;
- Improved access to quality and natural green space, reducing the numbers of people visiting Cannock Chase;
- Biodiversity enhancement

**4.30** The site is identified within the Stafford Town Local Area Framework, as part of recommendations for Wildwood Park. This is the most ambitious project area for Stafford town which aims to yield many benefits including recreational areas providing health and community benefits, flood mitigation and biodiversity.

**4.31** The GI Strategic Plan notes that the Weeping Cross area is well located on the Borough's main strategic recreational network, although access to the canal is limited with the towpath occupying the opposite bank to the settlement. The area contains a high percentage of older people. Large open green space in the area is restricted, small local spaces are limited, with a lack of community spaces in which interaction can take place.

**4.32** The identified GI area around the site, specifically Wildwood Park, aims to provide activities for those that cannot for mobility reasons enjoy the Park such as families with young children or less-mobile older people. Key actions relevant to the area around the site include:

- Enhance the area through creating exercise routes and associated infrastructure such as green gyms;
- Explore the possibility of linking Wildwood Park to the Penk Valley through installing a pedestrian bridge across the canal;
- Ensure that new facilities for younger people do not affect the peaceful nature of the Park.

**4.33** HSL will work with Stafford and key stakeholders, including the Wildlife Trust, to deliver key biodiversity and green infrastructure benefits.

## Landscape & Visual Impact

**4.34** The proposals would comprise development of dwellings no more than 2.5 storeys high. Implementation of residential development on the site would result in a change to the landscape character of the site itself but would have no significant adverse effects on the landscape features of the site that contribute to its character (such as the trees), or on the contribution the site makes to local landscape character.

**4.35** Visual effects of the development are likely to be limited to local views from Radford Bank and Ripon Drive and some views from adjacent properties. These would be reduced as new planting matures.

**4.36** The design of open spaces and proposed planting would be focussed on providing integration of the proposal into its setting but would also provide landscape enhancements through pond and tree management and strengthening of hedgerows.

**4.37** The proposal would allow for the implementation of an agreed landscape management plan which would ensure the long-term success of the landscape proposals and appropriate management of the existing vegetation.

**4.38** Notably, there were no objections from the Staffordshire County Council Environmental Specialist Team (Landscape) on the 2013 planning application for 80 dwellings. The response consider that the mitigation incorporated into the design would allow for landscape enhancement, which is the landscape character policy objective for the 'Riparian Alluvial Lowlands in the Staffordshire Plain' area.



Photo of the site from Radford Bank. The existing woodland trees provide enclosure and the adjacent residential area influences its character.

## Flood Risk and Drainage

**4.39** The entire site is located within Flood Risk Zone 1 with reference to the Environment Agency flood maps and therefore residential development would be entirely acceptable in line with national guidance on flood risk. There are no water bodies within the site although an agricultural drain runs along the southern boundary into the canal.

**4.40** The Environment Agency surface water mapping indicates there is a low risk of surface water flooding. The vulnerability of the development to flooding from all other sources including sewerage, groundwater and artificial water bodies has been reviewed and no issues have been identified.

**4.41** At this stage it has been assumed surface water flows can be drained via gravity and will be restricted via on site attenuation through the use of ponds and swales. Infiltration methods are likely to be suitable for surface water disposal in parts of the site, due to the underlying sand and gravel. On-site investigations will confirm at detailed design stage.

**4.42** Foul flows will drain by pumped solution towards an existing sewer on Radford Bank which travels adjacent to the site. Surface and foul outfalls would be to Severn Trent infrastructure.

## Utilities

**4.43** Based on the information currently available for review, the existing utility infrastructure within the vicinity of the development site appears to be capable of supporting the additional demand required to provide connections for the

## Environment Agency Flood Map



proposed development. Radford Bank itself accommodates a foul sewer, surface water sewer, fresh water supply, gas main, electricity, BT services and Virgin fibre.

**4.44** Formal applications will be made to the relevant statutory network operators to confirm the actual availability of capacity within the existing networks and to provide firm points of connection.

## Agricultural Land Quality

**4.45** The Natural England Agricultural Land Classification regional maps identify the majority of the site being 'Urban' classification with an area along the western edge being classified as Grade 3 agricultural quality with adjoining land predominantly in urban use. Further survey investigations would determine

if the land is considered best and most versatile (i.e. Grade 3a or above).

**4.46** The area of land classified as Grade 3, would not be economically practicable or viable for commercial agricultural farming given its small scale and isolated location between roads and residential dwellings.

## Highways and Transportation

**4.47** Radford Bank is a classified adopted main road with a speed limit of 30mph. HSL have undertaken initial highway assessment with Eddisons which confirms a standard 5.5m wide residential access, with 2.0m footways and 6.0m radii is achievable. In order to achieve acceptable distances from the bus layby and pedestrian crossing, the bus layby will need moving slightly in accordance with design standards. A 30m separation distance is provided between the access points and

the pedestrian crossing and bus layby. Early discussions with Staffordshire County Highways will be held to explore other potential options and seek agreement.

**4.48** The site benefits from excellent regular bus services with the closest bus stops located on Radford Bank immediately adjacent to the site. These are served by the number 74 Chaserider bus service which connect the site to Stafford centre and Cannock. The number 826 Chaserider connects the site to Stafford town, Rugeley and Lichfield. These services typically provide two services per hour Monday to Friday between approximately 05:44 and 19:44.

Saturday services are less frequent with buses running every hour from 06:24 to 19:44.

**4.49** Stafford Railway Station is located approximately 2.4km west of the site and is linked to the site via bus routes 74 or 826. The total journey time from the site is 16 minutes and as such provides a realistic opportunity for residents of the proposed site to make a linked sustainable trip. Stafford Station provides direct and frequent services to Birmingham, Manchester and London.

**4.50** Improvements to the existing bus stops could be provided as part of development proposals to encourage their use.

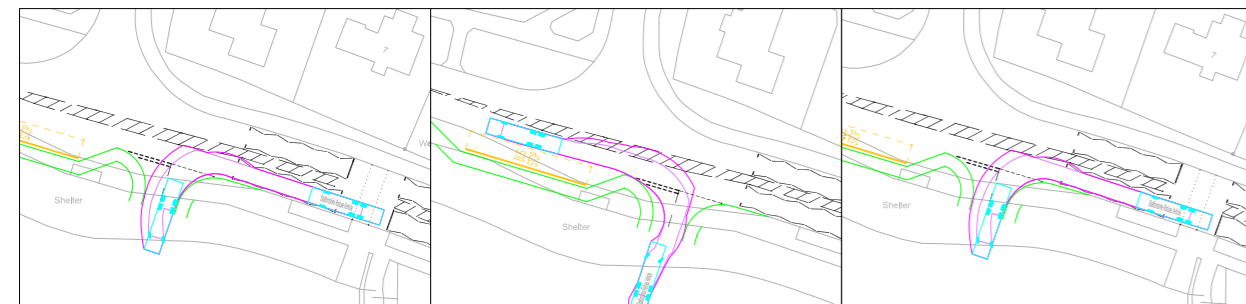
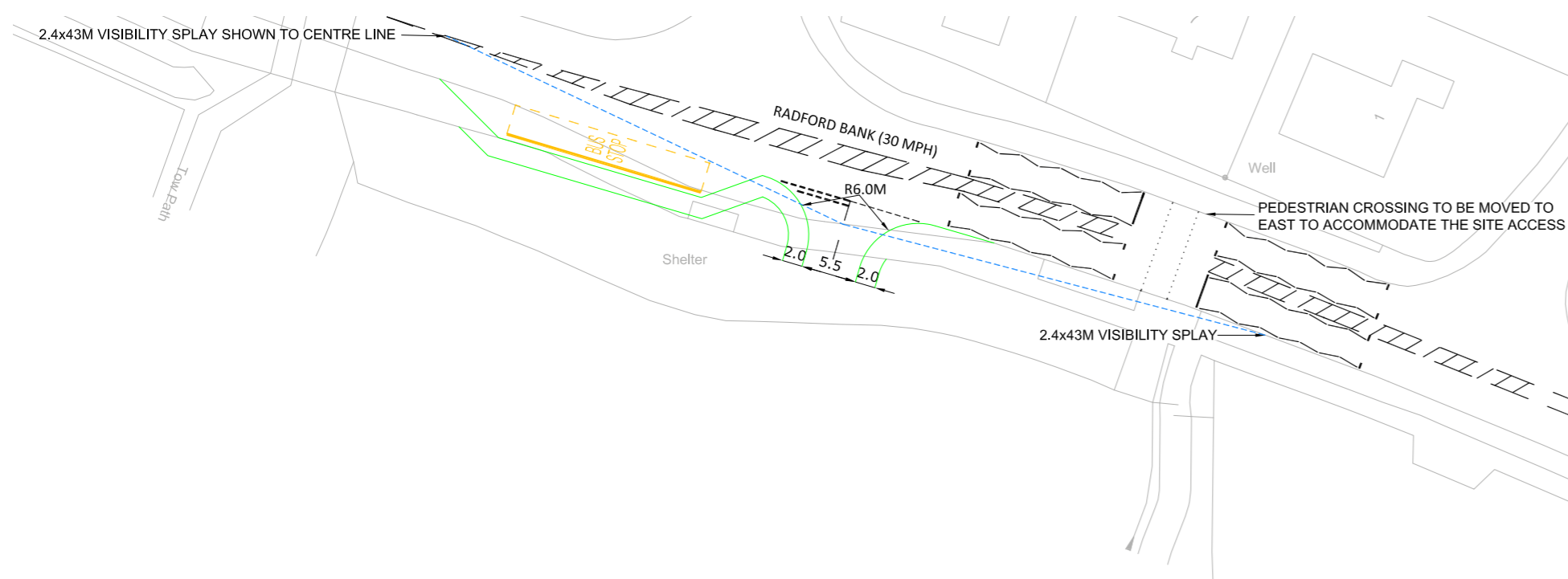


Photo of the site from Radford Bank. The existing woodland trees provide enclosure and the adjacent residential area influences its character.



# HISTORIC APPLICATION

## 5.0 Historic Application

**4.51** An historic outline planning application was submitted in 2013 (Ref: 13/19777/OUT), prior to our involvement, for up to 80 dwellings and was refused on 21 March 2014 for the following technical reasons:

- The 80 dwelling development would adversely affect the character of the Green Infrastructure Network;
- The development would fail to preserve and enhance the character and appearance of the canal conservation area;
- The proposed access onto the A34 Radford Bank is too close to the existing controlled pedestrian crossing;
- Insufficient information on the effects of the development on the Cannock Chase SAC;
- Potential detrimental impacts for wetland birds.

**4.52** No objections were received from the Environment Agency, Severn Trent Water, Staffordshire County Council (Schools Organisation), Natural England, SCC Historic Environment, SCC Landscape, SCC Rights of Way, Borough Tree Officer, Canals and River Trust, Borough Parks and Open Spaces, and Environmental and Health Services (Affordable Housing).

**4.53** We have reviewed the historic planning application in detail and seek to ensure any new proposals respond positively and sensitively to the issues raised. We deal in turn the key issues raised at in 2013/14 in the table opposite.



Above: 2013 planning application masterplan show an inward-looking development with limited green and blue infrastructure enhancements and a lack of appreciation for surrounding context.

Issue Raised	Officer Report Commentary	Positive Response
<ul style="list-style-type: none"> <li>■ <b>Impact on the Green Infrastructure Network</b></li> </ul>	<p>The report acknowledges that the Green Network policy is not so prescriptive as to seek to prevent all development. However the construction of 80 houses within the overall site of 4.9 ha would fundamentally fail to maintain and enhance the Green Network and wedges and is not considered appropriate.</p> <p>The residential development that would extend unnaturally into an area of open land.</p>	<ul style="list-style-type: none"> <li>✓ The new proposals are green infrastructure-led, forming more than 58% of the gross site area (2.86 ha) and more sensitively designed.</li> <li>✓ Existing key features such as the woodland will be maintained, significantly enhanced with new native planting and maintained in the long term to align with Staffordshire BAP priorities.</li> <li>✓ Reduced from 80 dwellings to 60 dwellings with an outward-looking scheme.</li> <li>✓ The existing woodland areas on-site have significantly matured, further enclose the site so that existing housing has a stronger relationship with it.</li> </ul>
<ul style="list-style-type: none"> <li>■ <b>Impact on canal conservation area</b></li> </ul>	<p>The wooded terrace features make a positive contribution to the setting of the conservation area. The site would encroach into a valuable visual buffer of green space between the canal and housing to the east. Acknowledges that the setting of the canal varies along its length between suburban enclosed setting to more expansive views.</p>	<ul style="list-style-type: none"> <li>✓ The existing woodland areas on-site have significantly matured and further conceal the site from the canal.</li> <li>✓ There is limited visibility from the canal to the site. The proposed scheme will maintain the special interest of the conservation area and will enhance its appreciation by creating sensitive public access in accordance with NPPF (para. 206).</li> <li>✓ Therefore there are no expansive views from the site, however the new proposals create an opportunity to provide new public access close to the canal to appreciate the character and appearance of the conservation area.</li> <li>✓ A wide woodland landscape buffer between the canal and new dwellings will be maintained and enhanced (30-90 metres wide).</li> </ul>
<ul style="list-style-type: none"> <li>■ <b>Sub-standard highway access design</b></li> </ul>	<p>It was not considered that the traffic increases associated with 80 dwellings would exacerbate any existing problems. The detailed design of the access onto Radford Bank is geometrically sub-standard in that its position is too close to the existing controlled pedestrian crossing thereby increasing the risk to road users.</p>	<ul style="list-style-type: none"> <li>✓ We have undertaken highway assessments which confirms a standard 5.5m wide residential access, with 2.0m footways and 6.0m radii is achievable.</li> <li>✓ In order to achieve acceptance distances from the pedestrian crossing the bus layby will need moving slightly in accordance with design standards.</li> <li>✓ A 30m separation distance is provided between the access points and the pedestrian crossing.</li> <li>✓ We are undertaking pre-application discussions with Staffordshire Highways to confirm precise designs.</li> </ul>
<ul style="list-style-type: none"> <li>■ <b>Potential effects on Cannock Chase SAC</b></li> </ul>	<p>Notes the proposal to provide 1.2ha of on-site green infrastructure/open space. Biodiversity Officer advises that a Habitat Regulation Assessment is required due to the proximity of the site to the SAC.</p>	<ul style="list-style-type: none"> <li>✓ A full ecological assessment and HRA will be provided in support of an application.</li> <li>✓ The site is in close proximity to Wildwood Park with excellent recreational opportunities which would be attract new residents on the site away from designated sites.</li> <li>✓ The majority of the site will be maintained and enhanced with new public accessibility, seating areas and interpretation boards.</li> </ul>
<ul style="list-style-type: none"> <li>■ <b>Potential impacts for wetland birds</b></li> </ul>	<p>Potential impact on Radford Meadows to the west of the site. The Biodiversity Officer considered that the scale of housing development on the proposed site would have the effect of reducing the open space area. The floodplain meadows to the west are managed for wetland birds which are prone to disturbance and require large open spaces. All key landscape features must be retained. Further survey is required.</p>	<ul style="list-style-type: none"> <li>✓ The site is not within a flood zone so no wetland areas exist. There is an opportunity for blue infrastructure via swales and ponds to be incorporated into the design to provide new wetland areas for birds.</li> <li>✓ The site is physically separated from Radford Meadows by the canal.</li> <li>✓ A large area of the site (2.86 ha), over 58% of the gross area, will be dedicated to enhanced open space along the western and southern areas. <ul style="list-style-type: none"> <li>✓ Key landscape features will be retained and enhanced.</li> </ul> </li> </ul>

## Landscape Changes

**5.1** The landscape context has also significantly changed since 2013. The woodland belt along the west of the site was young, gappy, with long range views to the west across Radford Meadows.

**5.2** There are now virtually no visual links between the canal and the site. As a result, the site now has an even stronger visual relationship with the residential area immediately to the east and north and shown in the photographs and satellite imagery opposite.



Right: Satellite imagery in 2010 showing much of the western boundary is open.

Below: Photograph in 2012 showing visual openness to the west.



Left: Satellite imagery in 2022 showing trees along western boundary have matured and extended.

Below: Photograph in 2022 showing mature woodland boundary contains the site.





# LOCAL PLAN 2040

## 6.0 Local Plan 2040

### EHDNA Housing Scenarios

**6.1** The Economic and Housing Development Needs Assessment (EHDNA) considered seven growth scenarios (A-G) and recommended that the future housing need in the Borough ranges from the minimum LHN of 408 dpa at the lower end, rising to 647 dpa (711 dpa PCU) at the upper end to align with the Regeneration Scenario (Scenario E) identified need. Scenario E considered growth projected to occur at a new garden community and Stafford Station Gateway, equal to around 12,500 jobs.

**6.2** At this stage, the Council has chosen 545 dpa as the preferred option which would appear insufficient to support the level of future economic growth taking into account the new garden community at Meecebrook and development at Station Gateway.

**6.3** The EHDNA notes that the Framework at paragraph 82c states that planning policies should “seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment” which retains the link between integrating economic growth and housing need. There is a clear risk that where the labour force supply is less than the projected job growth (as here), this could result in unsustainable commuting patterns and reduce the resilience of local businesses, resulting in a barrier to investment.

**6.4** It goes on to say that “ensuring a sufficient supply of homes within easy access of employment opportunities represents a central facet of an efficiently functioning economy and can help to minimise housing

*market pressures and unsustainable levels of community (and therefore congestion and carbon emissions). If the objective of employment growth is to be realised, then it will generally need to be supported by an adequate supply of suitable housing”.*

**6.5** The EHDNA identified an annual affordable housing need of 389 dpa based on 25% of income. This is a very significant need, representing 73% of the preferred option requirement figure of 535 dpa. Given the concerns related to viability of preferred allocations, it is very likely significantly fewer affordable homes will be delivered during the plan period than are needed.

**6.6** In Stafford, the assessment finds that the propensity for younger people in the Borough to form a new household is lower than the national average. Lower quartile affordability in the Borough is particularly poor indicating that lower price houses may be unaffordable to those on lower incomes living in Stafford. Affordability ratios have increased over time, highlighting that properties have become less affordable. There is potential this could be exacerbated within Stafford town if inappropriate and/or insufficient sites are selected.

**6.7** The EHDNA recommends that the Council should give further consideration to whether increasing housing provision could help address a greater proportion of affordable needs.

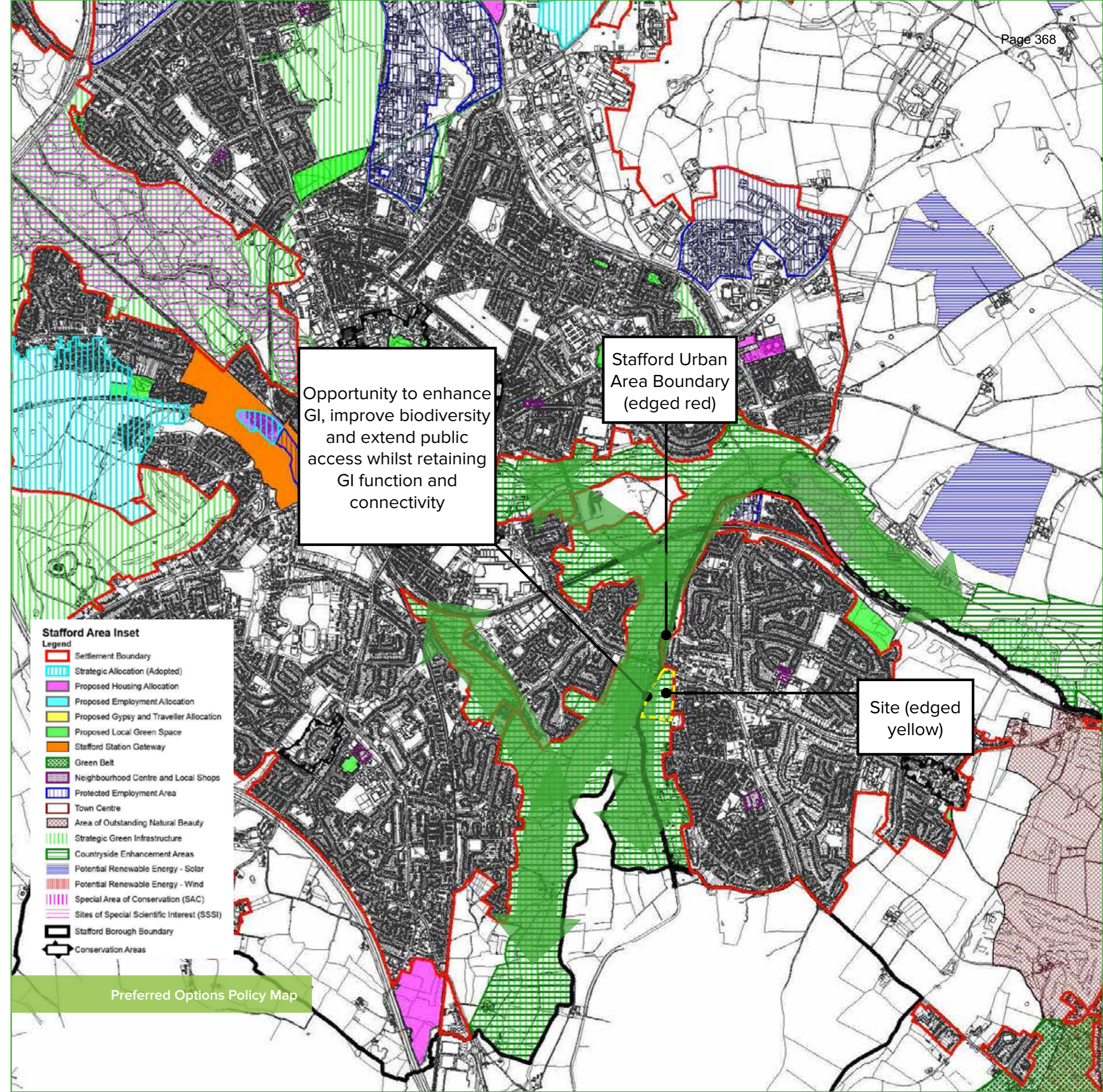
### Sustainability Appraisal

**6.8** The Sustainability Appraisal (SA) states that Stafford is suited to receive a significant proportion of growth on account of being the largest town in the borough, with a vibrant town centre and a series of large employment areas. It notes that the aim of the plan is to “allocate sites to meet needs in full for the entire plan period, and with a high degree of delivery certainty”. It states that there is a need to support a mix of site types, and a degree of dispersal (mindful of the settlement hierarchy), in order to ensure a robust housing supply trajectory.

**6.9** It highlighted a number of tensions with sustainability objectives as well as drawbacks to the preferred option due to:

- Imbalances between housing and employment growth leading to unsustainable commuting patterns;
- A lower growth scenario compared with the higher options meaning a reduced opportunity to meet locally arising needs, affordable housing and more unmet needs from adjoining authorities.

**6.10** The SA concluded that these drawbacks will require further consideration prior to plan finalisation. By comparison, growth scenarios involving more housing growth in Stafford town (such as 8 and 8a) performed very well, and out-performed the preferred option (6a) on air quality, housing and transport. The plan identifies a key issue as being the need to reduce the need to travel, supporting and enhancing access to services and facilities and to locate more development in locations which are more accessible to a



range of transport nodes (public transport, walking and cycling). Indeed, the SA comments that **“it will be important to ensure that opportunities to locate development where there will be greatest potential to minimum the need to travel, and enable modal shift away from the private car, are being realised prior to plan finalisation”**. The site performs very well against these aims and it is important that there is not a missed opportunity for the site to deliver housing while still achieving the objectives on enhanced green infrastructure.

**6.11** In addition, the SA noted a concern that the emerging housing requirement of 535dpa is significantly lower than would be needed to match the employment growth proposed in the plan.

**6.12** The SA also noted that a new important consideration for growth since the emergence of the COVID pandemic is access to indoor and outdoor space. It states that **“green infrastructure is more valued than ever as a recreational/well-being resource and the importance of addressing spatial imbalances in accessibility - both to green infrastructure and quality housing - has come to the fore”**.

**6.13** The SA concluded that **“there is a need to take a strategic approach to planning for green infrastructure...and the potential for growth in proximity to such areas, to help fund or deliver strategic enhancements”**.

**6.14** The SA notes a range of issues and constraints on sites within Stafford town, with concerns about the viability of schemes and delivery of affordable housing. Other than Meecebrook, **“the proposed allocations are predominantly in sub-areas where there is the potential to set a requirement for only 20% affordable housing, due to lower development viability”**. There is potential that on the chosen growth scenario and proposed

allocations chosen to-date, there will be a limited supply of affordable homes within the Stafford town area where needs are likely to be greatest.

## SHELAA

**6.15** The site is assessed in the HELAA under reference site number STAFMB22 (South of Radford Bank). The assessment makes a high level assessment of deliverability and concludes:

- The necessary infrastructure is considered to be available within the locality;
- There are no known legal or ownership issues;
- The site is available immediately;
- The site is situated adjacent to the currently recognised Local Plan settlement of Stafford;
- The site is classified as CIL typology STA1, which is considered financially viable;
- The site is available and achievable.

**6.16** However, the site is assessed in the SHELAA as being unsuitable due to it currently being designated within the Green Infrastructure policy area. It is unclear why the existing local Green Infrastructure policy is considered such an overriding constraint to development particularly as it is not a national policy that protects areas or assets of particular importance recognised by the Framework (e.g. Green Belt, Local Green Space, Area of Outstanding Natural Beauty, Natural Park or Site of Special Scientific Interest).

**6.17** The SHELAA (2022 Update) document recognises that **“the presence of a suitability constraint does not necessarily render it**

**automatically unsuitable”**. The SHELAA also considered that **“in order to inform the Council’s understanding of how much supply could potentially be delivered during the new Plan period, sites which may be considered ‘unsuitable’ under the existing planning policy regime will now be assessed in the context of preparing the new development strategy”**.

**6.18** It is therefore unclear why the site was discounted only because of the existing Green Infrastructure policy. Some proposed allocations impact on Tree Preservation Orders, Public Rights of Way and heritage assets, but these were not automatically discounted.

**6.19** The SHELAA was an opportunity to re-assess the potential some housing development on existing green infrastructure designations where its purposes and objectives can be protected and enhanced.

**6.20** With the benefit of the information in this Vision Document in support of the site, the local planning authority will be able to see that there are no constraints significant enough to make the site unsuitable and that with mitigation and enhancements some sustainable housing development can be accommodated in this location.



OPPORTUNITIES

# 7.0 Opportunities

## Site Considerations

**7.1** The findings of initial survey and appraisal work undertaken to date have established there are no known overriding constraints which would preclude development of the site for green infrastructure enhancements and up to 60 dwellings. The site is largely a grassland field which is separated physically from Radford Meadows by the canal. Careful and sensitive consideration was also given to comments from the planning authority which arose in the previous historic planning application in 2013/14.

**7.2** Contextually, the site is influenced by a suburban environment from existing development to the north and east. The woodland trees and shrubs are also a significant feature of the site along the west and south which enclose the site. This results in the central area of the site have a strong visual connection to the surrounding residential area. A modest scale of residential development would not be so out of character for the area. Shrubs and trees which align the boundaries of the site provides community and foraging habitats for animals and these elements should be retained and integrated into a green and blue infrastructure network.

**7.3** The Staffordshire and Worcestershire Canal, adjacent to the site, and the public right of way which runs along the west side of the canal, should be sensitively respected with an enhanced green buffer. This will also ensure that the core green infrastructure network to the west is not severed and the character is maintained, particularly in views from Radford Bridge.

## Opportunities

**7.4** There is a clear opportunity to meet wider GI and biodiversity objectives on a site within private ownership and with no other realistic mechanisms to deliver enhancements on the site. A range of other opportunities have been identified:

- Create a green infrastructure-led development with biodiversity net gains by protecting existing green infrastructure on-site along the western and southern boundaries and enhancing provision for the benefit of the wider network with native spaces landscaping;
- Create new significant open spaces with pedestrian access and informal recreation within the site in a local area where there are identified open space deficiencies. This will help in diverting impacts away from the SAC which is an objective of the Stafford BAP;
- Provision of up to high quality, modest scheme of 60 dwellings including a policy-compliant proportion of affordable housing in an area where affordable housing delivery has been poor;
- An outward looking development will create safer open spaces and a more attractive public realm;
- Ensuring design respects sensitivities along the canal and conservation area via a wide green buffer which minimises artificial light along the canal.
- Public access close to the canal could

facilitate information interpretation boards for communities to learn about the conservation area and Radford Meadows;

- The creation of new wetland habitats such as ponds for the benefit of birds and other animals to complement habitats along the River Penk. These areas will be sensitively designed to allow quiet areas for bird nesting by creating marshy land and deep ponds/swales to avoid excessive public/pet access;
- Creation of sustainable drainage solutions such as swales and attenuation ponds will help to meet objectives of the Stafford Biodiversity Action Plan;
- Avoid habitat fragmentation and create permeable habitat corridors through which species can move and create foraging and shelter for birds;
- Provide semi-natural habitats such as native broadleaved woodland, lowland meadow;
- Maintain extent of existing hedgerow and shrubs, and achieve net increase in length of hedgerow;
- Potential to expand local priority BAP habitats close to the site;
- Ensure linkages to existing pedestrian and cycleway network along the east;
- Creation of informal natural pocket parks or 'doorstep play' for recreation which would be a suitable local alternative to recreation at the SAC



DESIGN VISION

# 8.0 Design Vision

## Emerging Proposals

8.1 The proposed Vision Layout comprises:

- Over 58% of the site dedicated to open space, green and blue infrastructure enhancements, equivalent to 2.86 hectares, with new tree planting, ecological corridors and natural equipped children's play areas;
- Mitigation and significant enhancements to biodiversity to provide a net gain with long-term management;
- Provision of new ponds and wetland habitats for birds and other wildlife;
- A new safe and suitable vehicular access point off Radford Bank with 5.5m road and 2m footways on each side;
- An orbital walking route within the site for dog walking and short strolls to provide a suitable local recreational route away from the SAC;
- A residential development comprising approximately 60 dwellings satisfying local housing needs and supporting economic aspirations;
- An overall net development area of approximately 2.0 hectares, equating to an average moderate density of around 30 dwellings per net hectare;
- A balanced range of housing comprising a mix of types and sizes;
- Affordable housing provision on-site, in line with the requirements of local planning

policy and in an area with high demand;

- Provision of sustainable drainage systems which also provide blue infrastructure for wildlife.

## Design Principles

The scheme creates a sensitively designed, high-quality and green infrastructure-led scheme adjacent to the Stafford/Weeping Cross urban area which is in a highly sustainable location.

The development will be offset from the western boundary to allow for a 30-90m wide green buffer which retains the integrity of the wider GI network. This buffer will also help to respect the importance of the Staffordshire and Worcestershire Canal which is a conservation area.

Existing key features such as the woodland will be maintained, significantly enhanced with new native planting and managed in the long-term to align with the Staffordshire BAP priorities and the aims and objectives of emerging policy.

The proposed housing design will mirror existing and consented development character and densities so that there is a moderate density overall with the majority of the site retained for green infrastructure.

Existing landscape components are proposed to be retained, bolstered and integrated into an accessible network for the community.

The proposed development will have outward facing housing frontages to overlook open spaces.

Public seating and interpretation boards will help this local asset to be better appreciated with new views created from the edge of the site.

The development will open up the site to public access and offers a range of recreational benefits, including children's informal play spaces such as a high-quality LEAP and 'play-on-the-way' designed along footpaths.

The proposals will reserve site low points for sustainable drainage systems, incorporating features for wildlife, new ponds and swales.

Larger homes near Radford Bank to imitate existing character.



Larger homes along Radford Bank and western edge to imitate existing character

Access off Radford Bank with easy connections to bus stops & facilities

Connections to existing cycleways and footpaths

New wildlife corridors along east, south and western boundaries

Up to 60 high quality homes with a mix of sizes and tenures, including affordable housing

Connections to existing cycleways and footpaths

Public recreational orbital footpath

30-90m green buffer along western & southern edge

Local area for play

Sustainable drainage ponds

Significant new native tree planting

New seating areas and interpretation boards

Swales to create wetland habitat corridors and natural barriers to access

Emerging Vision Layout

Informal 'play-on-the-way'

## How do the proposals 'fit-in' with the emerging Local Plan 2040?

### Location

**8.2** The is located adjacent to the urban area, the Stafford urban settlement boundary, which is the highest ranking tier of settlements for sustainability. In locational terms, the site is in one of the most sustainable locations in the Borough.

**8.3** The emerging Local Plan seeks development to be located and designed to minimise the need to travel and prioritise sustainable travel by facilitating safe connections to infrastructure for walking, cycling and the use of public transport. The Sustainability Appraisal recognises the risk of an imbalance between housing and employment growth leading to unsustainable commuting patterns. It suggested this needs further consideration prior to plan finalisation.

**8.4** The proposals align with emerging policy objectives better than other proposed allocations which are located further away from Stafford town (where the main hub of jobs, services and facilities are found) with limited or no existing sustainable transport options.

### Cannock Chase SAC

**8.5** The emerging Local Plan seeks to ensure Cannock Chase SAC is not harmed and that all new housing development within 15km should take necessary steps to avoid or mitigate any adverse effects upon the SAC's integrity. This may include contribute to habitat management, provision of additional recreation

space, measures to encourage sustainable travel and education and awareness. The proposals align with these objectives.

### Green and blue infrastructure and Countryside Enhancement Areas

**8.6** The emerging Local Plan seeks for existing green networks to be enhanced by:

- creating and improving connectivity for people and nature, enabling communities to make regular contact with the natural environment, by encouraging walking and cycling;
- maximising opportunities for street tree planting and landscaping to assist with urban cooling;
- creating high-quality open spaces that are robust and adaptable;
- providing long-term maintenance and management;
- retaining existing green infrastructure unless any loss will be replaced by enhanced provision by providing 32 metres squared of open space per person;
- the function and connectivity of GI network is retained

**8.7** The Stafford Borough Nature Recovering Network Mapping (Staffordshire Wildlife Trust, 2020) highlights the rivers Penk and Sow as a wetland opportunity area, stating "the area around the confluence of the Rivers Sow and Penk present a potential opportunity for habitat enhancement and flood risk attenuation".

**8.8** The proposals can deliver these objectives on a privately-owned site where

enhancements cannot otherwise be delivered without some development.

### Historic Environment

**8.9** The site is outside but adjoins the Staffordshire and Worcestershire Canal which is a conservation area. The existing woodland helps to provide a buffer within the site which can be enhanced. The woodland currently limits any views to and from the canal.

**8.10** The proposals seek to further enhance the woodland edge, ensuring a 30-90m wide buffer, with public access and interpretation boards, as well as biodiversity enhancements. The design will be sensitive and respect the importance of the conservation area.

### Urban Design

**8.11** The emerging Local Plan seeks to ensure development proposals accord with the National Design Code and Design Guide, will suit their context by responding to locally distinctive patterns of development, and will create places with distinctive identity which is influenced and well-related to the positive characteristics of the area.

**8.12** The proposed policies suggest a range of good urban design principles which the proposals can deliver.

### Affordable Housing

**8.13** Emerging policy seeks to deliver 20% affordable housing on sites in the Stafford town area. Stafford town has pockets of high deprivation and affordable housing is particularly needed in the area. Some existing and proposed housing allocations have viability issues so there is a concern that meeting affordable housing will be significantly hindered



Visualisation of the proposals maintaining the function & enhancing the GI network



unless SME sites such as this are allocated.

**8.14** The NPPF recognises the importance of SME sites to the delivery of housing as they can deliver quickly.

### The 'do nothing' scenario

**8.15** Whilst emerging and existing policy and objectives seek enhancement on the site, the potential for this without any funding is highly unlikely and thus unrealistic. The site would continue to be managed for grazing, with limited/no positive intervention in terms of biodiversity improvements or new woodland planting and wetland habitats.

**8.16** The site would remain private land with no public access. The aims and objectives sought by the planning authority, Council and stakeholders for biodiversity and green infrastructure enhancements would be unfulfilled.



Above: The site would remain in private ownership with no public access, no biodiversity or green infrastructure enhancements, without any realistic policy intervention for some modest development.



Example of some natural play proposed within the woodland area on site

# CONCLUSION

## 9.0 Conclusion

**9.1** The Vision Plan demonstrates that the site can accommodate a high quality, sensitively-designed green infrastructure-led development which will respond positively to its urban and landscape surroundings.

**9.2** Consistent with patterns of urban growth in this area, a new development at land off Radford Bank would create a logical and sustainable addition immediately adjacent to the Stafford Urban Area which aims to provide a range of public benefits.

### Key Benefits

**9.3** This Vision & Delivery Statement has demonstrated the following:

- Over 58% of the site dedicated to open space, green and blue infrastructure enhancements, equivalent to 2.86 hectares, with new tree planting, ecological corridors and natural equipped children's play areas;
- A sensitive, high-quality residential development comprising approximately 60 dwellings satisfying local housing needs and supporting economic aspirations, in a highly sustainable location;
- Affordable housing provision on-site, in line with the requirements of local planning policy and in an area with high demand and pockets of deprivation. It will also assist with meeting affordable needs not being met by allocations;
- New green infrastructure planting will help provide cleaner air next to a residential

area;

- Mitigation and significant enhancements to biodiversity to provide a net gain with long-term management, to include provision of new ponds and wetland habitats for birds and other wildlife;
- Sensitive public access close to the canal with seating, natural play and interpretation boards for communities to learn and appreciate the importance of the conservation area and Radford Meadows in accordance with NPPF (para. 206);
- New recreational public green spaces such as an orbital walking route within the site for dog walking and short strolls and natural play areas to provide suitable local recreational activities away from the SAC. This helps improve public enjoyment of nature, health and well-being and overall quality of life;
- An overall net development area of approximately 2.0 hectares, equating to an average moderate density of around 30 dwellings per net hectare;
- A balanced range of housing comprising a mix of types and sizes, First Homes and homes for older people to downsize to;
- Provision of sustainable drainage systems which also provide blue infrastructure for wildlife.
- The site is in a highly sustainable and accessible location where there are a wide range of services, facilities and recreation available within walking distance from the site.

- The site is in a highly sustainable and accessible location where there are a wide range of services, facilities and the area has excellent public transport links with future households of the development helping to sustain these services and provide bus stop upgrades.
- The site is considered an SME site which the NPPF states makes an important contribution to housing supply and can be built-out quickly;
- A strong landscaping and environmental approach to the design can provide significant ecological benefits through the creation of new habitats and wildlife corridors as a way to deliver and support emerging policy objectives;
- The site is a viable, sustainable site and deliverable early in the Local Plan 2040 period to provide homes for local people over the next several years;
- There are no constraints which would prevent development coming forward immediately, helping to ensure a healthy future housing supply of small and medium-sized sites and contributing to the soundness of the emerging Local Plan 2040.

**This document promotes the identification of the site as a residential allocation in the Stafford Local Plan 2040 for green infrastructure and 60 homes in a sustainable location whilst bringing a range of significant public benefits.**





Artist's Impression



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**From:** Ben Weatherley [REDACTED]  
**Sent:** 12 December 2022 11:57  
**To:** Strategic Planning Consultations  
**Subject:** Local Plan 2020-2040 Preferred Options - Representations on behalf of A.G & H Barnett & Son

Good morning,

Please find attached representations on the Preferred Options consultation on behalf of A.G & H Barnett & Son, comprising a completed consultation form – including a drawing (location plan) referred to within our representations, as an attachment at the end of the completed form/PDF document.

For the avoidance of doubt and to avoid any of this representation being overlooked in error, we have within the form provided an answer and comment in response to the following questions:

- Question 2 (Policy 1)
- Question 2 (Policy 2)
- Question 3
- Question 4 (Policy 12)

Please confirm your receipt of this email and attachment by reply.

I look forward to hearing from you.

Kind regards,

Ben

**Ben Weatherley**  
Partner

**Knights**



W [www.knightsplc.com](http://www.knightsplc.com)

**Knights**

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## Contact Details

**Full name (required):** Ben Weatherley

**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):**

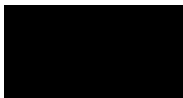
Knights (agent) - on behalf of A.G & H Barnett & Son

**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:**

The Council's efforts to ensure it continues to have an up-to-date development plan in place to maintain a plan-led approach to development across the Borough are welcomed, as is the opportunity to comment on the Council's proposed approach to the New Local Plan in the Preferred Options consultation document.

However, this representation expresses substantive reservations about both the overall development strategy for the Borough, and the deliverability of a large garden community in the location proposed. In doing so it proposes that the Draft Local Plan is revised to (amongst other things) allocate more land for housing development in Stone, as the second largest town in the Borough, and more specifically that the Council considers the allocation of land in our client's ownership on the existing urban edge of Stone (accessed off Pingle Lane).

The Preferred Options Local Plan focuses the most growth around Stafford, Stone and the proposed garden community at Meecebrook. There are also some small-scale site allocations proposed at Gnosall and Woodseaves, but no growth proposed at any other 'Tier 4 larger settlements' (as identified in the proposed settlement hierarchy in Policy 2), including Hixon or smaller Tier 5 settlements. Over half of all the proposed new housing allocations/supply sources are proposed to be delivered at Meecebrook.

For reasons explained in more detail later in these representations (in response to Question 3), we strongly oppose the inclusion of Meecebrook as a new garden community in the development strategy. We have serious scepticism and concern over the suitability of the proposed location and extent of the new garden

community at Meecebrook, its feasibility including mindful of the level of new infrastructure to enable such a high level of development in a poorly connected area at present, and the viability of delivering the amount of development in the plan period (up to 2040) that the development strategy and Local Plan overall depends on.

It is asserted that this strategy poses a genuine risk to the Council's ability to maintain a supply of deliverable housing sites upon adoption of the Local Plan, or later in the plan period if Meecebrook does not start delivering a meaningful number/contribution of homes by 2030 as the Borough Council hopes and anticipates. In effect, the Council's development strategy represents close to a "putting all of your eggs in one basket" approach.

The deliverability of Meecebrook will be discussed in more detail later in this representation, but if new homes are not delivered at Meecebrook within the timescales envisaged, that would likely lead to the authority being faced with speculative applications if it cannot demonstrate a deliverable housing land supply later in the plan period. This would undermine the plan-led approach to development in the Borough that the Council is rightly seeking to pursue.

Furthermore, we submit that the Local Plan should be revised to allocate more land in Stone for the development of new housing. The Preferred Options Local Plan recognises the significance of Stone, as the second largest town in the Borough, but includes only some small housing allocations (in both number and anticipated yield) relative to its size, status and growth potential. This is principally as a result of the inclusion of the proposed new garden community at Meecebrook and anticipated delivery of some 3,000 homes there by 2040, which we consider to be the major flow of the Preferred Options Local Plan for the reasons summarised above.

We assert that the development strategy should be revised to remove the proposed new garden community at Meecebrook altogether, and provide additional housing allocations elsewhere in its place – including at suitable locations on the edge of Stone.

Considering the conclusions of the various elements of/responses within this representation, the current development strategy for the Borough and the Meecebrook garden community is considered to be unsound on the basis that there is an insufficient level of robust evidence to demonstrate that the plan is realistic, viable and deliverable, and the Council is encouraged to rethink the proposed development strategy.

Consequently, it is submitted that the Council should promote a development strategy that prioritises the following strategy:

1. Growth around the two largest settlements in the Borough (Stafford and Stone) – including a higher level of growth around Stone.
2. Growth around additional Tier 4 larger settlements (not just Woodseaves and Gnosall), including site allocations.
3. Some limited growth around the Tier 5 smaller settlements, including some small site allocations and facilitating some rounding off and infilling as appropriate to each individual settlement and its characteristics and development opportunities.

It is considered that the above approach would be more viable and deliverable and that any proposals for larger scale garden communities could form the basis of any future Local Plan or a Local Plan review, which would give sufficient time for the various issues highlighted in this representation to be resolved, without rushing the plan through to an examination or finding that the plan subsequently fails because insufficient numbers of homes (and other development needs) are being delivered.

In our view the current proposed strategy in the Preferred Options Local Plan would stifle growth in and around existing villages, even those with a range of local services and facilities that cater for the daily needs of residents in those settlements (and are consequently included in Tier 4 and Tier 5 of the settlement hierarchy). Given that housing affordability is an issue of increasing prevalence and importance in rural areas, and that it is recognised in national policy that some additional housing in rural communities can help support the viability of local services and facilities, the current proposed development strategy would appear to conflict with the broad thrust of national policy to support sustainable rural communities. The proposed alternative development strategy set out above is therefore considered to be more viable, realistic and deliverable than the one currently being proposed by the Council.

More specifically, given its location abutting the existing urban edge of Stone – as the second largest town in the Borough – and short distance from (and within walking and cycling distance of) the town centre, combined with the relatively low number of proposed new homes currently planned for in Stone over the plan period, it is submitted that the Council should give due consideration to the potential to allocate some of our client's significant land holding for housing development. The land in question is shown on the drawing at Attachment 1 to this completed response form, which highlights a potential area to deliver a large number of new homes (edged red) and additional land in our client's ownership (edged green). We propose that this land offers the potential to be included as a housing allocation as part of item 1 of our proposed revisions to the development strategy set out above.

It is acknowledged that a key challenge in terms of the feasibility of delivering new homes within this site is achieving acceptable access arrangements. The land is currently accessed via Pingle Lane, which is a relatively narrow and poorly surfaced lane that climbs up towards and crosses over a narrow railway bridge, before then climbing up further to the land in question (that comprises greenfield agricultural land). Our client is giving further consideration to the potential feasibility of achieving access to and from the site for the purposes of achieving a potentially large number of new homes, and a separate Call for Sites representation may be prepared by submitted for the Council's consideration in due course.

However, it is asserted that it would be well worth giving further consideration to the site's constraints and opportunities and potential to make a meaningful contribution to the supply of new homes to 2040. We say this particularly given its large size, potential to come forward in phases, being in single ownership, and location in close proximity to the town centre relative to its size and compared to the other proposed greenfield housing allocations on the edge of Stone in the Preferred Options consultation document, along with the apparent significant challenges of delivering new homes at Meecebrook in this timeframe and resulting need to plan for alternative locations for new housing.

Therefore, we assert that this site should be considered by the Council as a potential alternative to Meecebrook (or addition to it should the Council agree that additional housing and employment allocations are required to mitigate for potential delays in the delivery of new development at Meecebrook), to provide a major urban extension in the Local Plan on the edge of the second largest town in the Borough.

It is submitted that, aside from the access constraint highlighted above that our client is giving further consideration to, development of this site would require relatively limited new infrastructure, especially by comparison to the extensive new road, public transport, utilities and other infrastructure connections that would be required to enable a new garden community at Meecebrook to be realised.

Even if the LPA rejects our proposed revisions to the development strategy and persists with Meecebrook, despite strong objections to it and genuine concerns over its feasibility and the viability of it delivering anywhere near to the intended levels of development by 2040, it is submitted that the Local Plan needs to factor in the likelihood of development at Meecebrook stalling and facilitate new housing development elsewhere to allow for that scenario (and thus avoid undermining the plan-led approach to development in the Borough). Our client's land in Stone presents a potential site for inclusion as an additional allocation for new housing as a major urban extension to the town, to ensure the housing and employment requirements of the Local Plan and related needs in the Borough are met.

**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:**

In light of our reservations about the feasibility and viability of the proposed new garden community at Meecebrook, and related objection to the inclusion of Meecebrook as a new garden community in the Local Plan – and our related comments in response to Question 2 (Policy 1) and Question 3 – we oppose the inclusion of Meecebrook in the settlement hierarchy.

We otherwise agree with the settlement hierarchy, including the inclusion of Stone in Tier 2.

However - as set out in detail in our response to Question 2 (Policy 1) – we propose that the development strategy is revised to facilitate a higher level of growth around Stone, as part of a solution to address the concerns about the feasibility and viability of Meecebrook.

We also assert that the development strategy should be revised to facilitate the following, as further elements of that solution:

- i. Growth around additional Tier 4 larger settlements (not just Woodseaves and Gnosall), including site allocations.
- ii. Some limited growth around the Tier 5 smaller settlements, including some small site allocations and facilitating some rounding off and infilling as appropriate to each individual settlement and its characteristics and development opportunities.

We feel strongly that a major shortcoming and flaw of the Preferred Options Local Plan is the combination of the over-reliance on Meecebrook for the delivery of new homes up to 2040, the relatively small amount of growth in Stone given its size and status, and almost complete lack of support and allowance for growth – including both new housing and employment development – at the majority of other Tier 4 settlements, plus smaller Tier 5 settlements.

The Preferred Options consultation document rightly recognises the sustainability of these settlements, but then fails to take the opportunity to allow any controlled growth of them over the next 17 years. Draft Policy 2 indicates that new development in each tier of the hierarchy will be of a scale commensurate with the position of each settlement in the hierarchy, but the extremely limited potential for growth/development in Tier 4 and 5 settlements that the Preferred Options Local Plan allows for does not fulfil this policy/objective.

In turn, the Preferred Options Local Plan would stifle growth in and around existing villages, even those with a range of local services and facilities that cater for the daily needs of residents in those settlements (and are consequently included in Tier 4 and Tier 5 of the settlement hierarchy). This would conflict with the broad thrust of national policy to support sustainable rural communities, which recognises that some additional development (including housing) in rural communities can help support the viability of local services and facilities.

Consequently, it is submitted that the development strategy should be revised to correct this shortcoming and in the manner we have proposed, with the settlement hierarchy amended if/as necessary to facilitate and accord with those revisions to the development strategy (such that it would be more viable, realistic and deliverable than the one currently being proposed by the Council).

### **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:

As summarised in our response to Policy 1, we have strong reservations about the feasibility and viability of the proposed new garden community at Meecebrook. In our view there is a flawed over-dependence on the delivery of new homes and employment at Meecebrook in the Preferred Options Local Plan, which unnecessarily risks undermining the plan-led approach to meeting the Borough's development needs in the coming years; particularly given the availability of deliverable alternatives either in place or in addition to new development at Meecebrook within the plan period.

We note from the Council's Local Development Scheme that it envisages submitting the plan for examination during 2024 and that the plan, if found sound, would be adopted around Autumn 2024. Given the time it takes Local Plans to be prepared and examined, it is considered that it is more likely that the plan is adopted during 2025, as invariably, many plans require Main Modifications at examination stage. This would have implications for the timely delivery of a garden community at Meecebrook.

It is noted from the Council's Lead-in Times and Build Rate Assumptions Topic Paper that a development of 500 dwellings or more in the Borough would have a lead-in time of 4.5 years with an outline planning application in place.

For Meecebrook to start delivering homes from 2030, this would require outline planning permission to be in place by mid-2025. A large-scale development of 3,000 dwellings would be EIA development and require substantive technical reports and assessments to be undertaken and carried out prior to the submission of any such planning application for a garden community.

This would require work on preparing a planning application to be commencing now, with a planning application being submitted before the end of 2024. An emerging development plan would carry limited weight in the determination of a planning application until such time that it had passed examination, so the LPA would be unable to determine a planning application favourably until the new Local Plan is nearing adoption.

Following this, any resolution to grant planning permission would need to be subject to the negotiation of a Section 106 Agreement which is likely to be complex and involve a number of landowners before it can be executed and planning permission granted. A further complexity is that a Section 106 Agreement may require the involvement of Network Rail to secure the delivery of the proposed railway station.

Following any grant of outline permission, detailed consents would need to be secured and conditions discharged before any physical works on any phase(s) of development within the site could take place, and it is likely that significant infrastructure would need to be delivered before any dwellings can be delivered as part of the proposed garden community.

Further to this, the Local Plan consultation indicates that the delivery of 3,000 dwellings at Meecebrook would take place between 2030 and 2040, equating to the delivery of 300 dwellings per annum. Given the challenges highlighted above, it is unlikely that 300 dwellings per annum would be delivered at Meecebrook, particularly during the early years of the development.

Added to this, the Council's Lead-in Times and Built Rate Assumptions Topic Paper sets out that build out rate assumptions for developments of 2,000 plus dwellings would be 160 dwellings per annum, but then goes on to suggest that Meecebrook would deliver 300 dwellings per annum without any evidential basis for such an assumption. Even if it was to be accepted that Meecebrook would start to deliver housing from 2030, the Council's more considered build rate assumptions of 160 dwellings per annum suggest that only around 1,600 dwellings would be delivered at Meecebrook during the plan period.

There doesn't appear to be any evidence to demonstrate how the proposed garden community would be phased, whether all landowners within the proposed garden community have made their land available for development, nor has any evidence been presented to demonstrate that a developer or consortium of developers have been appointed or even approached to be development partners for the site. If no developers or consortium of developers are on board as delivery partners, then it would not be possible to ascertain the deliverability of the site and over what timeframe.

Consequently, it is considered that the envisaged delivery of dwellings at Meecebrook from 2030 is unrealistic and that 3,000 dwellings would not be delivered during the plan period. This would undermine the overall development strategy for the Borough with potential implications for the plan-led delivery of housing and employment development.

Turning to some of the specific matters detailed in the Concept Masterplan, the proposed garden community is to deliver a primary school and a secondary school, mixed use areas, commercial uses, and local centres / community hubs, in addition to a railway station.

At this stage, limited evidence has been published to properly explore the deliverability and viability of the above, nor has any evidence been published to demonstrate the deliverability of the proposed railway station. Whilst some technical studies have been produced to establish the feasibility of a railway station in the location proposed, there is no evidence to demonstrate whether:

- Discussions have been held with Network Rail to demonstrate whether they consider a railway station could be provided in this location.
- Discussions have been held with both Network Rail and train operators to demonstrate whether train timetables can be adjusted to accommodate an additional station in this location, and to what extent timetables may be affected by the works and subsequent operation of HS2.
- Other landowners around the vicinity of the proposed railway station have been consulted in terms of ensuring sufficient land is available around the proposed railway station for both the effective operation and maintenance of the railway station and the associated station buildings, platforms, vehicular access, parking, pick-up and drop-off and bus waiting facilities.

We note that the Council has published a questions and answers document which suggests that Meecebrook is not dependent on a station being built and the lack of a station would not automatically result in the proposal being removed from the plan.

Paragraph 73 of the NPPF is clear that new settlements should be served by a genuine choice of transport modes. At this stage, it is not clear how and when rail and bus services would be provided, yet this is a critical consideration here given the limited opportunities for sustainable transport modes that are currently available.

The policy is not clear as to how or when the social and physical infrastructure will be delivered and whether it would need to be in place upon completion of the first phases of residential development. Without any phasing details, the proposal could lead to some unsustainable patterns of development if any services and facilities are not delivered in a timely manner, or elements of the project later become unviable. This would result in a significant number of residents commuting using private transport to access services and facilities in other settlements that are absent from any new garden community in these circumstances.

As things stand, it is considered that the proposed garden community at Meecebrook would be found unsound at the Local Plan examination. This is the case for the following reasons:

- No justification has been provided to demonstrate that the inclusion of the garden community at Meecebrook is justified when assessed against reasonable alternatives, such as major urban extensions around the larger rural settlements.
- No delivery and implementation evidence is available taking account of relevant information about land ownership, delivery model and infrastructure requirements.
- No robust evidence has been presented to date regarding scheme viability which considers the necessary infrastructure, affordable housing provision, a realistic delivery trajectory and robust cost and value assumptions.
- No robust evidence has been presented to demonstrate that sufficient funding is available and whether or not further external funding is required, such as Homes England or Government funding, whether such funding has been applied for and secured, and whether or not any uncertainty around such funding has been factored into the overall delivery trajectory for the project.

Furthermore, we are aware that it was originally intended for Ministry of Defence land at Swynnerton to form a significant proportion of the proposed garden community at Meecebrook, but that the land in question no longer forms part of the proposed garden community.

The land in question comprises previously developed land, which would have been an important factor in its favour when it was considered amongst other reasonable alternatives prior to the Issues and Options consultation in 2020; and ultimately identified as the favoured option at that time. To our knowledge, the process of assessing Meecebrook by comparison to other reasonable alternatives has not been undertaken again following the removal of the Ministry of Defence land.

In light of the above considerations, it is considered that as matters stand, the inclusion of the garden community at Meecebrook would be found to be unsound at examination and the Council would be unable to adopt a Local Plan in its current form.

Consequently, it is submitted that the Council should make alterations to its proposed development strategy and settlement hierarchy/boundaries, as set out in our responses to Question 2 (Policy 1) and Question 2 (Policy 2).

## 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:**

Whilst we raise no objections to the proposed housing and employment allocations within Policy 12, we object to this policy on the basis that the Council should give due consideration to adding some of our client's land on the edge of Stone (as shown on the drawing at Attachment 1) to the proposed site allocations for new housing; and potentially in turn this policy.

Our reasoning for this is explained in detail in response to Questions 2 (Policy 1 and Policy 2) and 3 and we shall not repeat that here.

In the event the Council agrees to add some of our client's land on the edge of Stone for new housing development, potentially as a major urban extension to the existing Tier 2 settlement of Stone, it is acknowledged that it may be more appropriate for the site to be the subject of its own allocation policy prior to Policy 12 (i.e. in the same manner as the draft policies dedicated to sites such as Stafford Station Gateway); in which case Policy 12 itself would not need to be amended to include this site.

If however the Council were to propose to allocate a relatively small proportion of our client's land for new housing, Policy 12 may be the appropriate policy to confirm such an allocation and so this policy would need to be revised accordingly.

**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 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:**

**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](http://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.

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.**

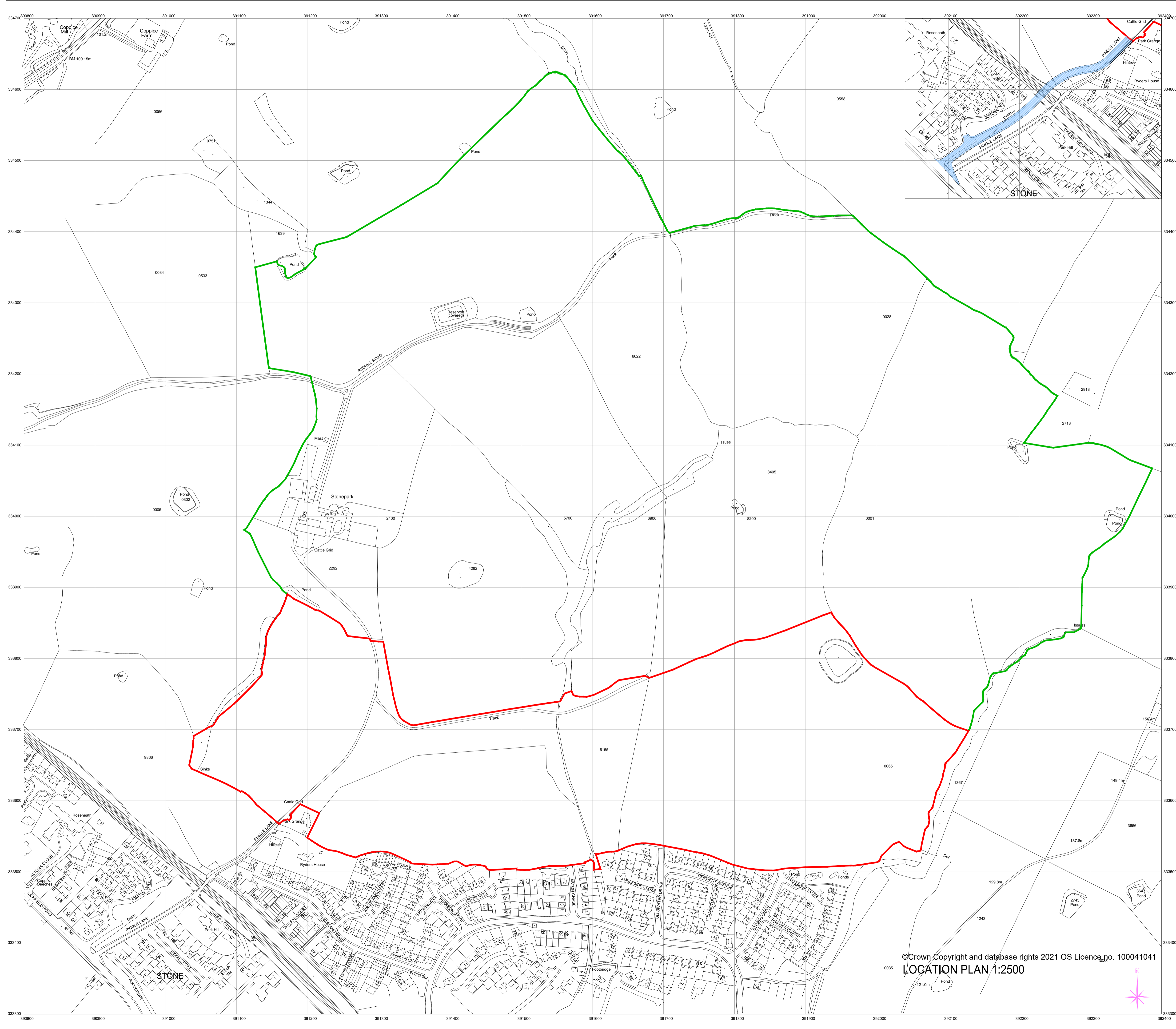
Completed forms can be submitted by email to:  
[strategicplanningconsultations@staffordbc.gov.uk](mailto:strategicplanningconsultations@staffordbc.gov.uk)

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

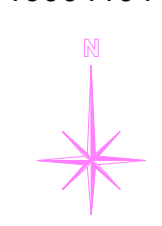
The consultation closes at 12 noon on Monday 12 December 2022, comments received after this date may not be considered.

**ATTACHMENT 1**

Plan showing land off Pingle Lane, Stone



©Crown Copyright and database rights 2021 OS Licence no. 100041041  
LOCATION PLAN 1:2500



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**From:** Ben Weatherley [REDACTED]  
**Sent:** 09 December 2022 14:26  
**To:** SPP Consultations; Strategic Planning  
**Cc:** [REDACTED]  
**Subject:** Representations to Preferred Options Stafford Borough Local Plan 2020-2040 (on behalf of Bri-Stor Systems Limited)  
**Attachments:** Preferred Options Representations (BRI315\_4) 2022.12.09.pdf

Good afternoon,

I write further to our recent completion (on 7 December) of the online Preferred Options consultation form on behalf of Bri-Stor Systems Limited.

Firstly, please note there was an error in the contact details we provided when submitting the online consultation form; we provided the email address [REDACTED] whereas the correct email address is [REDACTED]. Please update your records accordingly for our representations on behalf of Bri-Stor Systems Limited, and if you have already issued any kind of confirmation/acknowledgment email or other correspondence to that incorrect email address please re-issue it to this correct address.

Secondly, when completing the online consultation form we indicated the policies/content we wish to make representations on and that a letter featuring our representations would follow. Please find attached that letter in question, including associated appendices, which sets out those representations in question on behalf of this client.

Please confirm your receipt of this email and attachment by reply to both me and my colleague Michael Askew.

We look forward to hearing from you.

Kind regards,

Ben

**Ben Weatherley**  
Partner

**Knights**



W [www.knightsplc.com](http://www.knightsplc.com)



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**From:** Preferred Options Consultation [REDACTED]  
**Sent:** 07 December 2022 09:52  
**To:** Strategic Planning Consultations  
**Subject:** Preferred Options Consultation - Submitted Response

Full name: **Ben Weatherley**

Email: [REDACTED]

### **Agents and Developers**

Organisation or Company: **Bri-Stor Systems Limited**

Age: **Prefer not to say / not applicable**

Added to database: [REDACTED]

Topics (Contents page): **Meecebrook Garden Community**

### **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: **No reply**

Comments: **We would request that the LPA supports the expansion of existing RIEs (such as Pasturefields in Hixon) in addition to the Meecebrook Garden Community as this could enable new employment development to come forward more readily during the plan period (in the event that the MGC scheme stalls).**

## **Site Allocation Policies**

**Q4** - Do you agree with the proposed allocations?

Policy 9 (North of Stafford): **No reply**

Comments: **No reply**

Policy 10 (West of Stafford): **No reply**

Comments: **No reply**

Policy 11 (Stafford Station Gateway): **No reply**

Comments: **No reply**

Policy 12 (Other housing and employment land): **No**

Comments: **Policy 17 should be amended to enable the extension to the south of Pasturefields RIE in order to enable our client (Bri-Stor Systems Limited) to expand their business. See supporting letter (submitted separately) which sets out more detail.**

## **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: It is requested that Policy 17 be amended to enable the expansion of Pasturefields RIE. See supporting letter submitted separately.

**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**

Comments: **It is requested that Policy 40 be amended to allocate land to the north of Pasturefields Lane (north of Bri-Stor Systems Limited's premises) to be allocated as a solar/wind farm. This would enable our client to utilise renewable energy to support their business expansion proposals (in addition to the expansion of Pasturefields RIE).**

## 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:**

**Knights have submitted a detailed representations letter on behalf of Bri-Stor Systems which sets out the basis for which Policies 3, 17 and 40 should be amended.**

**Date** 9 December 2022  
**Our Reference** MASK1/BRI315/4  
**Please ask for** Michael Askew  
**Direct Dial** [REDACTED]  
**Facsimile** [REDACTED]  
**Email** [REDACTED]

# Knights

[REDACTED]  
Planning Policy / Strategic Planning  
Stafford Borough Council  
Civic Centre  
Riverside  
Stafford,  
ST16 2AQ

**BY EMAIL**

Dear [REDACTED]

## **Representations to Preferred Options Stafford Borough Local Plan 2020 – 2040**

### **Proposed Extension to Pasturefields RIE, Hixon to Include the Former Rushy Pits Farm Site, Church Lane, Hixon (South of Bri-Stor Systems Site)**

### **Proposed Solar & Wind Farm at Land North of Pasturefields Lane, Hixon**

Knights have been instructed to provide strategic representations on behalf of our client Bri-Stor Systems Limited in respect of the Preferred Options version of the Local Plan 2020-2040.

By way of background, Bri-Stor Systems Limited currently own land within the existing Pasturefields RIE, which is accessed off Church Lane and forms the main focus of their business. They also own land to the north of Pasturefields Lane (to the west of Hixon Industrial Estate). They are also currently renting the commercial units to the west of their premises (on the opposite side of the railway line) which are accessed off the A51. A plan showing the land owned and rented by Bri-Stor Systems Limited is contained in **Appendix A**.

The business is a significant employer in the area, with over 450 employees across their premises. They also operate an active apprenticeship scheme and currently have in the region of 50 apprenticeships based at this site (who typically live within a 15 mile radius of the site). Their apprenticeship scheme takes on between 20-25 apprentices per year. The existing workforce include a range of professional, skilled, semi-skilled and clerical staff (with the majority being skilled staff). In addition, they employ agency staff in order to accommodate the variable nature of their contracts, which can peak at 100no. agency staff during times when they are accommodating high volume contracts. This is a substantial increase from the circa 100no. staff that were employed in 2000 and the 250no. staff that they employed in 2014; demonstrating the upward projection of this business.

Our client's business is primarily focused upon conversions of light commercial vehicles and van storage systems; for which they are the UK's largest manufacturer. They have been operating for 35 years (including at this site since 2006) and have contracts with a wide variety of companies such as RAC and BT to prepare their fleet commercial vehicles.

**Proposed Extension of Pasturefields RIE to the south (to include Rushy Pits Farm)**

The nature of our client's business relies upon being able to accommodate sufficient land for the storage of these vehicles throughout the process (typically 2,000 vehicles at a time), often involving large volumes of vehicles being delivered to the site to be converted to their end use before being taken off site fully complete. The operations also require large areas of warehouse space for the vehicle conversion works to take place. For logistical reasons, it is important that the whole process takes place across the same site to provide efficiencies and keep down costs. Hence their current reliance upon renting the commercial premises adjacent to the site at Neptune Park that is accessed off the A51. It should also be noted that the site accommodates in the region of 300no. staff car parking spaces, and there is demand from their staff to increase this car parking provision.

Our client also has aspirations to provide a research & development facility and showroom at this new site, to improve their offer to their customers and to stay one step ahead of their competition. Such a facility would enable them to develop their products, increase the range of apprenticeship opportunities and attract and recruit new, highly qualified professionals to their business.

Our client's business is one of the most successful businesses operating within the Borough, and is a key employer in the local area. They are clearly an asset to the Borough, who are now well established at the site. Our client is looking to expand their business and the only way to do this is to utilise additional land. In order to create long-term financial stability, the ideal scenario is for them to have ownership of all their land and premises (so that they are not reliant upon other landowners and any potential change of circumstances beyond their control that could material affect the efficient and effective operation of the business). However, the Pasturefields Recognised Industrial Estate (RIE) is presently fully developed and the boundary that is tightly drawn around it in the Plan for Stafford Borough policies map does not afford them the opportunity to expand their existing business in a manner that would be compliant with the development plan.

**This current planning policy constraint puts our client at a crossroads as to how they can deliver their aspirations to move their business forward. They need to either expand beyond the existing Pasturefields RIE allocation boundary, or relocate their business to an alternative and larger site (most likely to be outside of the Borough).**

An example of our client's ongoing expansion plans was demonstrated when they applied for planning permission under LPA reference 14/20610/FUL for a 'single-storey factory extension for B1, B2 and B8 uses to be constructed in two phases, along with vehicle parking and manoeuvring areas' with a decision notice issued by the Council on 5 November 2017. This application site is located in the northern portion of the land in their ownership (which is accessed off Pasturefields Lane) and is expected to create a further 50no. jobs. This development has been lawfully commenced as set out in a letter provided to the LPA by Knights on 18 October 2017 (a copy of which can be provided on request). The client has not yet completed this scheme, but they intend to do so once they have clarity on whether they can deliver their wider aspirations to redevelop the land to the south at Rushy Pits Farm.

It is important to note that our client purchased land immediately to the south of their existing premises in December 2013, which could provide an excellent opportunity for them to expand their business into. However, the current status of this land - outside of a settlement or RIE boundary (and instead within the open countryside) - would make it extremely difficult for them to obtain planning permission to expand their business in this direction, as such a proposal would be contrary to the development plan.

In addition, in order to undertake the construction work to complete the separate and previously approved development to the north (14/20610/FUL), it is necessary for them to find alternative space to temporarily relocate the commercial vehicle parking elsewhere within the site, and as this space is presently at a premium, our client would benefit from using the Rushy Pits Farm site in the short term to relocate this parking provision until the development is completed.

The Rushy Pits Farm site was not always allocated within the open countryside. The Stafford Borough Local Plan 2001 (adopted in 1998), which is no longer saved, identified Pasturefields (RIE.5) on Inset Map 49 (an extract of which is contained in **Appendix B**), and included the Rushy Pits Farm site within the employment allocation. Furthermore, Policy EMP3 'Expansion of Existing Industrial Uses' of the Local Plan 2001 allowed extensions to existing businesses within their curtilages (and within the identified RIE boundaries) provided that they were utilised ancillary to the existing operations and were technically sound (i.e. in respect of visual and residential amenity, highway safety and nature conservation).

When the Plan for Stafford Borough Part 2 was adopted in 2017, the extent of the Pasturefields RIE was altered, which involved the exclusion of the area to the south and extending land to the southwest (beyond the railway line) as illustrated in **Figure 1**.

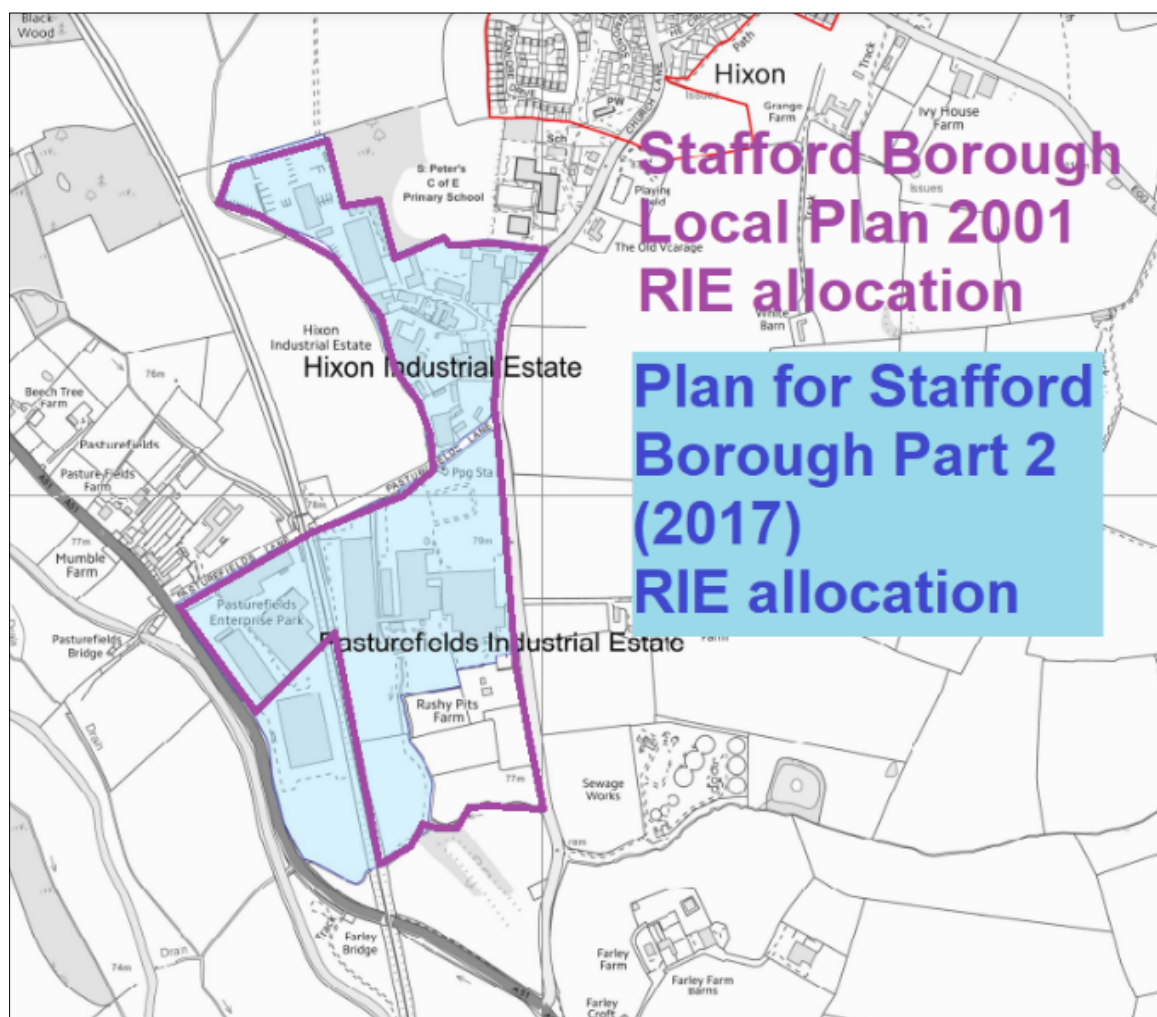


Figure 1 - Current Plan for Stafford Borough Part 2 allocation with previous allocation overlaid in purple

It is also relevant to note that outline planning permission was applied for under LPA reference 05/05284/OUT 'Outline application for industrial use of land including approval of means of access (B1, B2 & B8)' at Land at Pasturefields Industrial Estate. The southeast portion of this site comprises land to the south of our client's existing premises, located just beyond Rushy Pits Farm (with the balance remaining within the current RIE allocation). However that application was refused on 26 June 2006.

A further outline application was made under LPA reference 06/07170/OUT, described as 'Outline application for industrial use of land including approval of means of access (B1, B2 & B8)' at Land at Pasturefields Industrial Estate, but was again refused (on 9 January 2007).

The 05/05284/OUT refusal was appealed to the Planning Inspectorate, with the appeal dismissed in February 2007. The application site comprised part of the land which is no longer within the Pasturefields RIE (but did not include the Rushy Pits Farm site at the centre, which at the time was under separate ownership) as shown in **Figure 2**.



Figure 2 - Extent of application site for 05/05284/OUT and 06/07170/OUT

Notwithstanding this, at that time the entire Rushy Pits Farm site was located within the adopted Pasturefields RIE boundary; wherein the principle of employment development was accepted. The planning applications were only refused and the appeal dismissed for technical reasons, namely for drainage and ecology reasons. Indeed, when dismissing the appeal, the Inspector did not set out that such issues could not necessarily be overcome, but instead considered that insufficient information had been provided by the appellant to demonstrate the proposal was technically sound in those respects.

The principle of development (by virtue of its allocation) was questioned in the officer's delegated report for 05/05284/OUT, as it was noted that at the time the County Council Structure Plan and the Regional Spatial Strategy sought to channel new development into major settlements and away from greenfield rural locations. Notwithstanding this, this did not result in a reason for refusal of those planning applications. However, those policy documents cited in the officer's delegated report have long since been superseded, and Policy SP3 of the Plan for Stafford Borough now identifies Hixon as a Key Service Village which is within the sustainable settlement hierarchy where *"the majority of future development will be delivered"*.

Indeed the Preferred Options Local Plan 2020-2040 seeks to expand this settlement hierarchy further afield, with a greater emphasis on delivering new development within smaller (Tier 5) settlements under Draft Policy 2. It is therefore evident that the Borough Council is no longer seeking to solely focus new development within major urban areas, and indeed such an approach would be contrary to paragraphs 84 and 85 of the Framework which is now in place.

It is also important to note that the officer's delegated report for 05/05284/OUT confirmed the following:

- No objections raised to the proposed access by the Highway Authority.
- EHO supported the use of land for light industrial uses, but raised concerns regarding the impact on amenity of the occupants of Rushy Pits Farm (however it is important to note that our client has owned this land since 2013 and it is no longer occupied as an independent residential property).
- Environment Agency only objected to the scheme on the basis that insufficient information had been provided.
- National Grid noted that a high-pressure gas pipeline runs across the site (but would liaise with the applicant on how this could be mitigated).
- Network Rail raised no objections subject to conditions relating to construction, landscaping and drainage.
- No neighbour objections were received.

It is also noted from the officer's delegated report for 05/05284/OUT that the Parish Council objected to the planning applications (considering the issues to be insurmountable) and recommended that the site be removed from the employment allocation in the emerging Local Plan (i.e. the Plan for Stafford Borough).

It is however evident that, whilst the appeal against the refusal of the first planning application was dismissed, Knights have garnered from the appeal decision that the technical elements of drainage and ecology raised are by no means insurmountable and that the reasons for dismissing the appeal could be overcome with a bespoke proposal (such as our client's) that would be informed by supporting technical reports from a suitably qualified flood risk consultant and an ecologist. Indeed, the site is located within Flood Zone 1 (low probability of flooding) and the proposed employment use comprises a 'less vulnerable' use (as set out in Annex 3 'Flood risk vulnerability classification' of the Framework) which is an entirely acceptable use within this zone.

The 2005 and 2006 planning applications were submitted prior to our client owning or occupying their site to the north and our client only purchased the Rushy Pits Farm site some years afterwards. Instead, those two outline planning applications were submitted by another party who appear to have been seeking planning permission on a speculative basis, i.e. with no specific end user in place (and following the dismissal of the appeal it appears that they no longer had the appetite to pursue an alternative scheme that would overcome those technical issues). However, the ownership situation is now much different, with the site no longer in separate, fragmented ownership. Instead, all owned by the same party; our client (as illustrated in **Appendix A**). This makes the entire site available and deliverable as a single entity to provide a high quality and sustainable employment development, which would enable the expansion of our client's business to ensure its ongoing success and sustainability and its retention within the Borough.

It is unfortunate that our client was not aware of the intended changes to the Pasturefields RIE boundary when the Plan for Stafford Borough was being prepared, and our client was therefore unable to make representations at that time to demonstrate they had aspirations to utilise this site for employment purposes. It is therefore assumed that at the time, the LPA had formed the view that this site was neither available or deliverable to provide employment development during that plan period and sought to allocate alternative sites instead (such as extending Pasturefields to the west of the railway line at Neptune Business Park instead).

In light of the above, we would like to promote the Rushy Pits Farm site to be reintroduced in order for it to come forward as an extension to the existing Pasturefields RIE boundary as now proposed in Draft Policy 17 'Recognised Industrial Estates'. The extent of the site that we are promoting for inclusion within the Pasturefields RIE boundary is illustrated in **Appendix C** and has an area of 2.979 hectares.

The Preferred Options document seeks to allocated at least 80 hectares of employment land over the plan period, but presently does not propose to allocate this specific area within the wider site as a potential employment allocation (and instead proposes that it remain within the open countryside). Draft Policy 17 'Recognised Industrial Estates' proposes to retain the existing Recognised Industrial Estates of Hixon, Hixon Airfield, Ladfordfields, Moorfields, Pasturefields, and Raleigh Hall as employment allocations within the rural area, and Draft Policy 3 provides a closed list of scenarios which includes supporting employment development within these recognised industrial estates. Therefore, as it stands, the redevelopment of this site to provide an extension to the existing employment estate would be contrary to these two policies.

Notwithstanding this, Draft Policies 7 and 8 set out the proposals for the new Meecebrook Garden Community that seeks to provide 3,000 new homes and 15 hectares of employment land during the plan period (with the same again identified beyond the plan period).

It should also be noted that Chapter 6 of the National Planning Policy Framework ('the Framework') places significant weight on the need to support economic growth and productivity with an emphasis upon considering local business needs and wider opportunities for development within paragraph 81. Paragraph 84 of the Framework goes on to support "*the sustainable growth and expansion of all types of business in rural areas ... [including] through ... well designed new buildings*" whereas paragraph 85



goes on to acknowledge that *“planning policies ... should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent or to beyond existing settlements, and in locations that are not well served by public transport”*. In light of the above, bringing forward this site (which is outside, but adjacent to, an existing identified settlement) would nevertheless be positioned in close proximity to a number of the settlements that are identified within the revised settlement hierarchy that is proposed in Draft Policy 2, which include; Stone (at Tier 2), Hixon, Great Haywood, Little Haywood & Colwich, and Weston (at Tier 4) and Milwich and Aston-by-Stone (at Tier 5).

Whilst it is accepted that the Council is seeking to allocate a substantial amount of new employment land over the next two plan periods at the proposed Meecebrook Garden Community site, it is our client's view that it would be short-sighted of the Council to not consider the suitable extension of existing RIEs (such as Pasturefields RIE). Should the Meecebrook Garden Community project stall for whatever reason, the Council could be in a position whereby the Borough has limited ability to achieve new employment sites across their jurisdiction during the plan period. Conversely, by providing opportunities for suitable extensions to existing RIEs, alongside the Meecebrook Garden Community scheme, there would be greater opportunities to deliver employment growth across the Borough which in turn would be beneficial in terms of economic sustainability, particularly for sites on the opposite side of the borough such as Pasturefields RIE at Hixon.

Paragraph 85 of the Framework states that in order to deliver a prosperous rural economy, it is important for new employment development to be sensitive to its surroundings, be acceptable in terms of highway safety and provide opportunities to make the site more sustainable. The previous planning applications and appeal to redevelop this site (back in 2005 and 2006) raised no issues in respect of highway safety or accessibility, and it is considered that a robust Transport Assessment could demonstrate that its expansion now could be achieved in a technically sound manner, providing an additional access (if necessary) off Church Lane. Indeed, it is entirely possible that our client could deliver this scheme utilising their existing main site access off Church Lane and Pasturefields Lane, which are more than sufficient to accommodate the anticipated vehicle movements that would be generated by their expansion.

The proposed employment estate would contribute towards the 'at least 80 hectares target' and would provide a sustainable form of economic development which would be positioned near to Hixon and the wider Haywoods area as well as the established industrial estates of Pasturefields and Hixon Airfield RIEs, whilst providing excellent links to wider transport infrastructure and in doing so reinforcing the rural economy in the surrounding area.

In the long term, the proposed expansion may also free up the existing premises that the client is renting in the southwestern portion of Pasturefields RIE (at Neptune Business Park), and in doing so would provide an opportunity for that site to be occupied by a new business that could generate additional employment to the area.

On this basis, it is recommended that Draft Policy 17 be amended to enable Pasturefields RIE to be extended as set out in **Appendix C** which would include the former Rushy Pits Farm site and the field beyond to the south.

Our client's architect has produced an indicative masterplan to illustrate how the site would be redeveloped if it were to be reallocated for an employment purpose. This is provided at **Appendix D**.

It is evident from this indicative masterplan that the proposed development would appear as a logical extension to the existing industrial estate, being contained within defensible boundaries and avoiding unrestricted sprawl into the countryside. The proposed development would incorporate enhanced screening to enable it to assimilate into its surroundings as well as providing the opportunity to increase biodiversity net gain.

If this site were to be allocated for employment purposes, a subsequent planning application would be able to demonstrate that the scheme would be technically sound, including how the drainage and ecology issues raised in connection with the 2006 appeal can be addressed.

Considering the above, we would request that land to the south of Pasturefields RIE be allocated as an employment allocation in the Local Plan 2020-2040 by amending the wording of Draft Policies 3 and 17 to make provision for this site to be utilised for a range of light industrial (Class E.g.iii), general industrial (Class B2) and storage & distribution (Class B8) uses.

### **Proposed Solar Wind Farm and Biodiversity Enhancement Scheme North of Pasturefields RIE**

As mentioned previously, our client has recently purchased land to the north of their premises which is located directly to the north of Pasturefields Lane and to the west of the Hixon Industrial Estate RIE boundary.

They have aspirations to redevelop this site to provide a solar/wind farm which could contribute towards powering their main site (to the south). The site is shown in **Figure 3** below.



Figure 3 - Proposed Solar Farm allocation for Draft Policy 40 of the Local Plan 2020-2040

The Preferred Options consultation identifies a number of sites across the Borough as 'Potential Renewable Energy – Solar' sites (the nearest being near Ingestre to the west, near Weston to the northwest and near Fradswell to the north). There are currently none identified around Hixon. A 'Potential Renewable Energy – Wind' site is also proposed to the east of Fradswell.

It is therefore requested that our client's site be included as an allocation for solar photovoltaic generation and wind generation as set out in Draft Policy 40 'Renewable and low carbon energy' in the Local Plan 2020-2040.

Yours sincerely

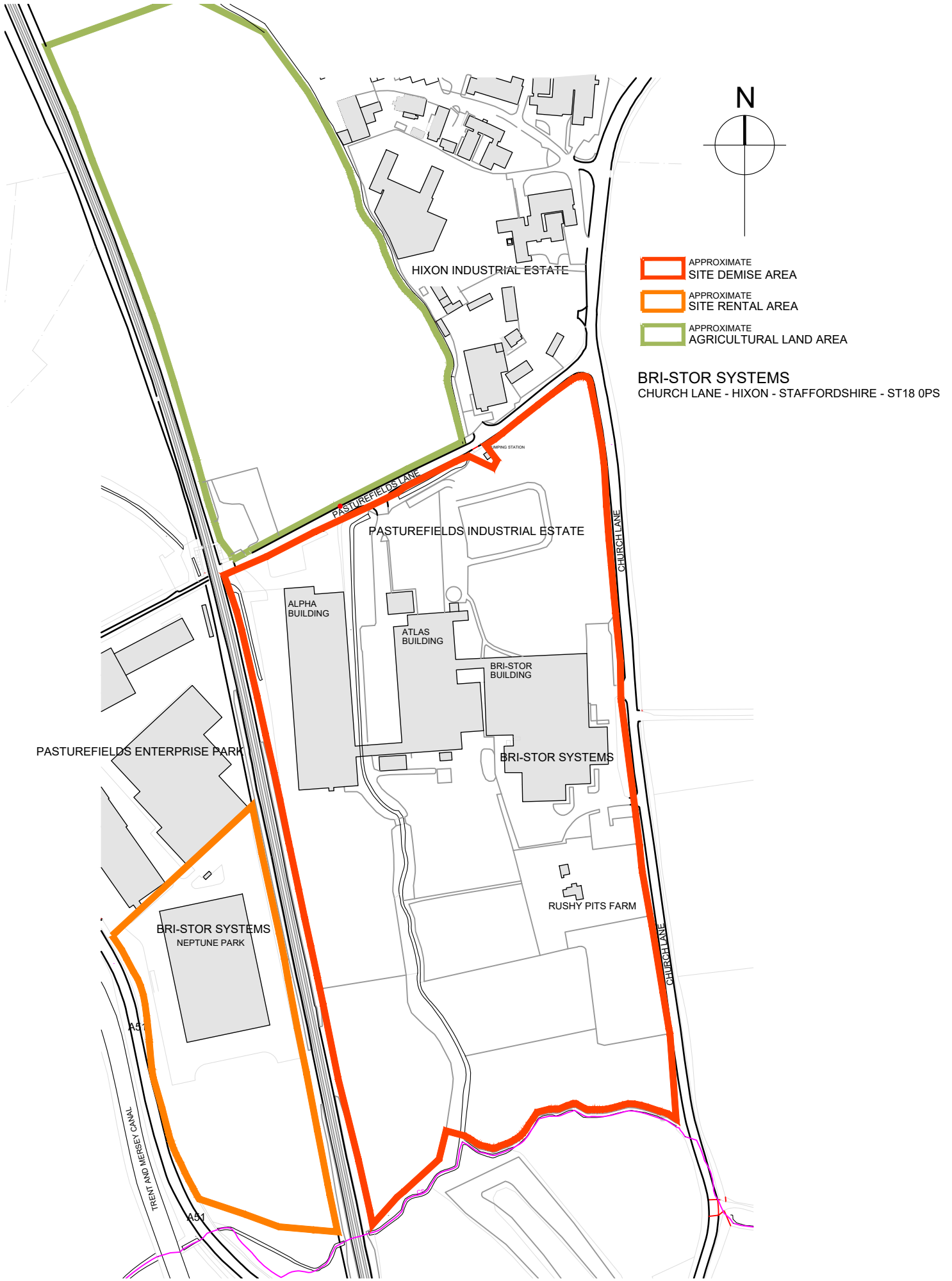


**MICHAEL ASKEW**  
**BA(Hons) PG Dip MRTPI**

Copy: 

**APPENDIX A**

Map showing land owned and rented by Bri-Stor Systems Limited



**APPENDIX B**

Extract of Inset Map 49 'Pasturefields RIE' in the Stafford Borough Local Plan 2001



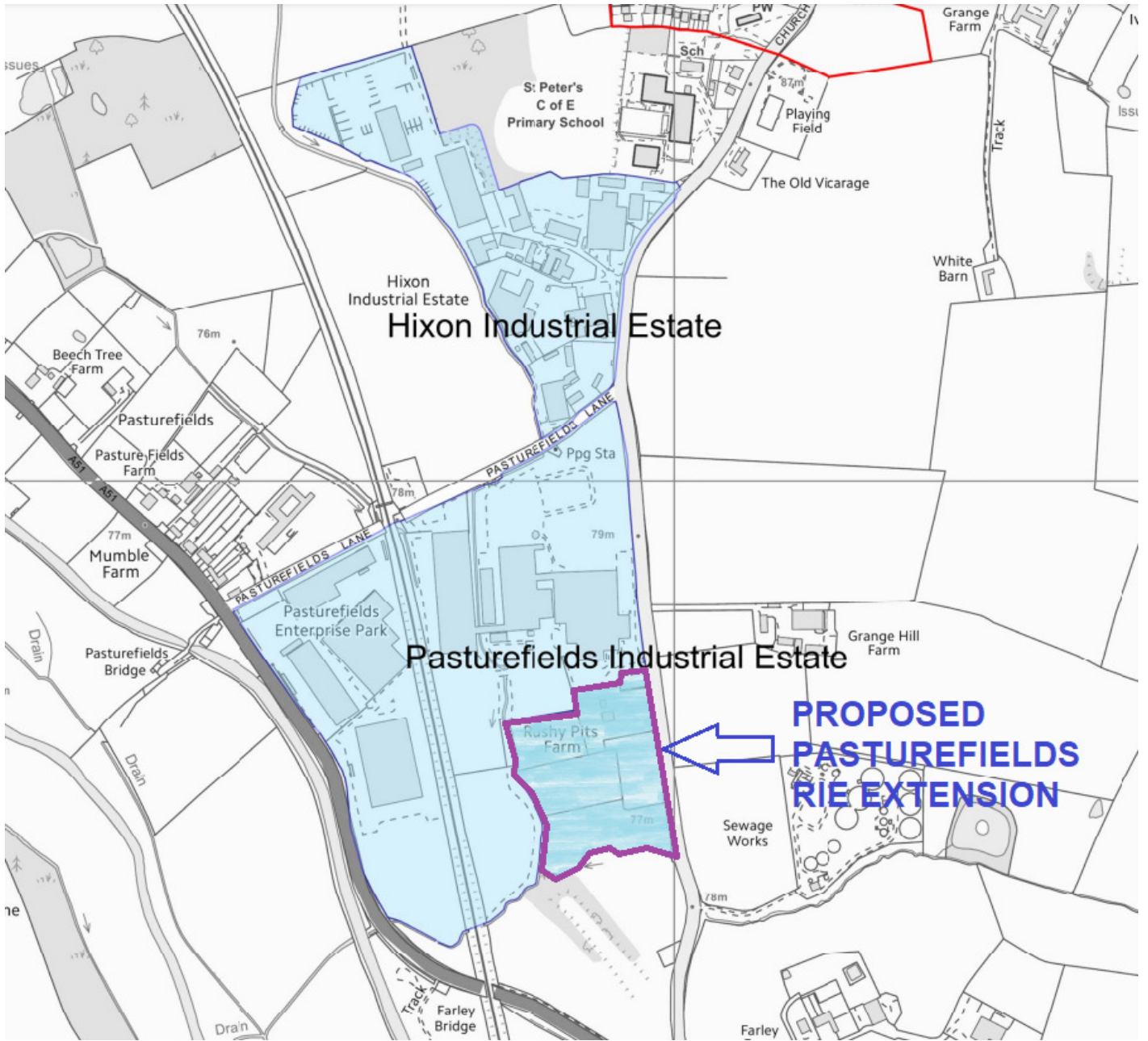
*Inset Map 49*  
*RIE 5 - Pasturefields*  
1:5,000

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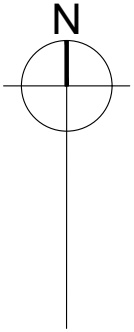
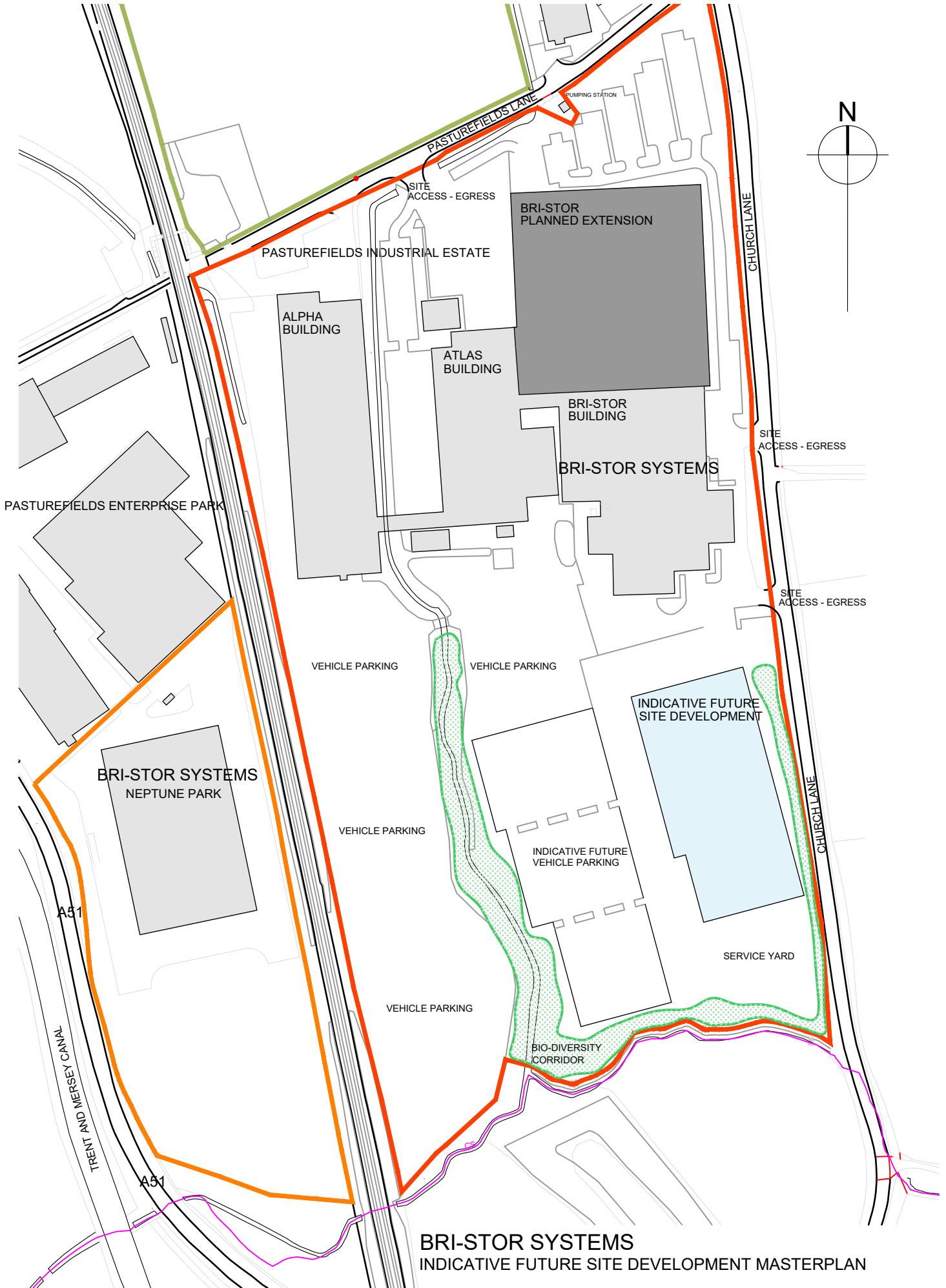
**APPENDIX C**

Proposed Amendments to Pasturefields RIE in Local Plan 2020-2040





**APPENDIX D – INDICATIVE MASTERPLAN TO REDEVELOP THE SITE**



---

**From:** Ben Weatherley [REDACTED]  
**Sent:** 12 December 2022 08:52  
**To:** Strategic Planning Consultations  
**Subject:** Local Plan 2020-2040 Preferred Options - Representations on behalf of CCP Developments (Stone) Limited  
**Attachments:** Preferred-Options-Consultation-Response-Form [CCP Developments (Stone) Ltd].pdf

Good morning,

Please find attached representations on the Preferred Options consultation on behalf of CCP Developments (Stone) Limited, comprising a completed consultation response form.

For the avoidance of doubt and to avoid any of this representation being overlooked in error, we have within the form provided an answer and comment in response to Question 4 (Policy 12) only.

Please confirm your receipt of this email and attachment by reply.

I look forward to hearing from you.

Kind regards,

Ben

**Ben Weatherley**  
Partner

**Knights**



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## Contact Details

**Full name (required):** Ben Weatherley

**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):**

Knights (agent) - on behalf of CCP Developments (Stone) Limited

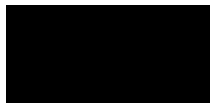
**Tick the box that is relevant to you:**

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

- Under 18
- ~~18-24~~
- ~~25-34~~
- ~~35-44~~
- ~~45-54~~
- ~~55-64~~
- ~~65+~~

Prefer not to say / not applicable

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



## Contents

The Local Plan Preferred Options includes the topics listed below.

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

- **Vision and Objectives** - page 5
- **Development Strategy and Climate Change Response** - page 6
- **Meecebrook Garden Community** - page 9
- **Site Allocation Policies** - page 10
- **Economy Policies** - page 14
- **Housing Policies** - page 16
- **Design and Infrastructure Policies** - page 18
- **Environment Policies** - page 19
- **Connections** - page 20
- **Evidence Base** - page 21
- **General Comments** - page 22

All of the local plan documents and the Local Plan 2020-2040: Preferred Options document are available here: <https://www.staffordbc.gov.uk/local-plan>

## **Vision and Objectives**

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

**"A prosperous and attractive borough with strong communities."**

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

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

Local Plan Preferred Options document reference: Page 12

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

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

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

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

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

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

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

To secure high-quality design.

## Development Strategy and Climate Change Response

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

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

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

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

Local Plan Preferred Options document reference: Pages 19 to 40

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

Yes / No

**Policy 1 Comments:**

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

Yes / No

**Policy 2 Comments:**



**Policy 3. Development in the open countryside - general principles**

Yes / No

**Policy 3 Comments:**

**Policy 4. Climate change development requirements**

Yes / No

**Policy 4 Comments:**

**Policy 5. Green Belt**

Yes / No

**Policy 5 Comments**

**Policy 6. Neighbourhood plans**

Yes / No

**Policy 6 Comments:**

## **Meecebrook Garden Community**

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

**Do you agree with the proposed new garden community?**

Yes / No

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

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

Local Plan Preferred Options document reference: Pages 41 to 45

**Comments:**

## Site Allocation Policies

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

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

**Do you agree with the proposed allocations?**

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

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

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

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

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

### **Policy 9. North of Stafford**

Yes / No

**Policy 9 Comments:**

**Policy 10. West of Stafford**

Yes / No

**Policy 10 Comments:**

**Policy 11. Stafford Station Gateway**

Yes / No

**Policy 11 Comments:**

**Policy 12. Other housing and employment land allocations.**

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

Yes / No

**Policy 12 Comments:**

We support the inclusion of the land adjacent to Stone Police Station (STO09) in the proposed site allocations for housing development.

However, please note that the site is in fact larger than shown on the Town Centre Inset of the Draft Stone Policies Map, and has strong potential to deliver more homes than the three indicated in Policy 12.

By way of background, CCP Developments (Stone) Limited secured planning permission in December 2021 for conversion of the adjoining former police station buildings to eight apartments (reference 21/33919/FUL), and have subsequently completed that development (with all the apartments now sold).

Furthermore, and following detailed and lengthy pre-application engagement with the local planning and highway authorities – and the Borough Council's Conservation Officer and Design Advisor in particular – CCP have applied for full planning permission for the erection of nine dwellings on the land to the rear of that development/the former police station buildings. The application reference is 22/36297/FUL and the proposal comprises a row of eight terraced homes along the Station Road frontage, plus a single detached self-build home (for the applicant themselves) inside the Northesk Street site boundary.

We would urge you to review the application drawings for 22/36297/FUL, and in particular the site location plan and proposed site plan, as they confirm the full/correct extent of this redevelopment site. The site extends further to the west than the site allocation shown on the Draft Policies Map, comprising the land that previously accommodated both a car park that served the police station (accessed from Station Road), plus a public car park immediately to the west (accessed off Northesk Street).

All the site is vacant previously developed land within the Stone Town Centre Inset Map and, as confirmed in our engagement with the LPA and key consultees both prior to and following submission of the current planning application, its redevelopment for residential purposes is plainly acceptable in principle in the context of both development plan policy and other material considerations (including the National Planning Policy Framework).

The current planning application is awaiting determination and has been the subject of positive consultation responses from the Conservation Officer and Design Advisor, amongst others, and we are currently engaging with the Planning Case Officer with the aim of addressing some queries that have been raised and consequently securing planning permission.

If planning permission is granted, the applicant intends to implement the development swiftly. Consequently, it may well be the case that this site has already been redeveloped – and nine dwellings delivered as a result – by the time the New Local Plan is adopted.

Whilst it is hoped (and we remain confident) that the current planning application will be approved and the development of nine dwellings subsequently implemented, clearly the granting of planning permission cannot be guaranteed in advance of the application being determined. With this in mind, and should that application/proposal not be realised for any reason, please also be aware that the site has potential for alternative forms of residential development that could deliver a further increase in the number of dwellings at the site.

For example, the extensive pre-application engagement regarding this development site included an earlier scheme for a three storey block of 18no. 2-bed apartments, which was well received before the applicant elected to pursue the housing proposal the subject of the current planning application. The site could also lend itself to the development of the likes of a residential care home and/or other form of specialist accommodation for the elderly.

Consequently, we respectfully assert that the site boundary/allocation for this specific site on the Stone Policies Map, and indication of site capacity within Policy 12, be adjusted to take account of the full and correct extent of the site and its redevelopment potential/capacity.

**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 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:**

**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](http://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.

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](mailto: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:** Ben Weatherley [REDACTED]  
**Sent:** 12 December 2022 11:57  
**To:** Strategic Planning Consultations  
**Subject:** Local Plan 2020-2040 Preferred Options - Representations on behalf of Ivanovic & Company Limited

Good morning,

Please find attached representations on the Preferred Options consultation on behalf of Ivanovic and Company Limited, comprising a completed consultation form.

For the avoidance of doubt and to avoid any of this representation being overlooked in error, we have within the form provided an answer and comment in response to the following questions:

- Question 2 (Policy 1)
- Question 2 (Policy 2)
- Question 3
- Question 4 (Policy 12)

Please confirm your receipt of this email and attachment by reply.

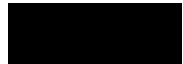
I look forward to hearing from you.

Kind regards,

Ben

**Ben Weatherley**  
Partner

**Knights**



W [www.knightsplc.com](http://www.knightsplc.com)

**Knights**

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## Contact Details

**Full name (required):** Ben Weatherley

**Email (required):** 

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

- ~~Statutory Bodies and Stakeholders~~
- Agents and Developers
- ~~Residents and General Public~~
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**Organisation or Company Name (if applicable):**

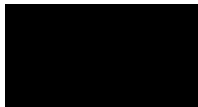
Knights (agent) - on behalf of Mr B Ivanovic, Ivanovic and Company Limited

**Tick the box that is relevant to you:**

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

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- ~~18-24~~
- ~~25-34~~
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- Prefer not to say / not applicable

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## 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:**

The Council's efforts to ensure it continues to have an up-to-date development plan in place to maintain a plan-led approach to development across the Borough are welcomed, as is the opportunity to comment on the Council's proposed approach to the New Local Plan in the Preferred Options consultation document.

However, this representation expresses substantive reservations about both the overall development strategy for the Borough, and the deliverability of the large garden community proposed at Meecebrook. In doing so, it proposes that the Draft Local Plan is revised to facilitate more development at Tier 4 and Tier 5 settlements across the Borough. Furthermore, this representation proposes that some of the land at Aston-by-Stone in the ownership of Ivanovic and Company Limited should be included within the settlement boundary for this Tier 5 settlement, and/or allocated for housing development, as part of a revised strategy to enhance the prospects of the Borough's housing requirements up to 2040 being met.

The Preferred Options Local Plan focuses the most growth around Stafford, Stone and the proposed garden community at Meecebrook. There are also some small-scale site allocations proposed at Gnosall and Woodseaves, but no growth proposed at any other 'Tier 4 larger settlements' (as identified in the proposed settlement hierarchy in Policy 2), or 'Tier 5 smaller settlements' (including Aston-by-Stone). Over half of all the proposed new housing allocations/supply sources are proposed to be delivered at Meecebrook.

For reasons explained in more detail in our response to Question 3, we have serious scepticism and concern over the viability of delivering the amount of development in the plan period (up to 2040) at the proposed new garden community at Meecebrook that the development strategy and Local Plan overall depend on.

It is asserted that this strategy poses a genuine risk to the Council's ability to maintain a supply of deliverable housing sites upon adoption of the Local Plan, or later in the plan period if Meecebrook does not start delivering a meaningful number/contribution of homes by 2030 as the Borough Council hopes and anticipates. In effect, the Council's development strategy represents close to a "putting all of your eggs in one basket" approach.

The deliverability of Meecebrook will be discussed in more detail later in this representation, but if Meecebrook isn't delivered within the timescales envisaged, that would likely lead to the authority being faced with speculative applications if it cannot demonstrate a deliverable housing land supply later in the plan period; particularly given the limited amount of new housing development elsewhere in the Borough that the Preferred Options Local Plan has allowed for. This would undermine the plan-led approach to development in the Borough that the Council is rightly seeking to pursue.

Furthermore, we feel strongly that a major shortcoming and flaw of the Preferred Options Local Plan is the almost complete lack of support and allowance for growth – including new housing – at the majority of Tier 4 settlements, and at smaller Tier 5 settlements.

We assert that the development strategy should be revised to provide additional housing allocations and revised settlement boundaries at Tier 4 and Tier 5 settlements, to facilitate some controlled growth of these well-established sustainable rural settlements with good connectivity and levels of existing services.

Given the conclusions of the various elements of/responses within this representation, we consider the current proposed development strategy for the Borough and the Meecebrook garden community to be unsound on the basis that there is an insufficient level of robust evidence to demonstrate that the plan is realistic, viable and deliverable, and the Council is encouraged to rethink and adjust the proposed development strategy to address these important issues.



Consequently, it is submitted that the Council should revise their proposed development strategy to allow:

1. Growth around additional Tier 4 larger settlements (not just Woodseaves and Gnosall), including site allocations.
2. Some controlled growth around the Tier 5 smaller settlements, including some small site allocations and/or revised settlement boundaries to facilitate some rounding off and infilling as appropriate to each individual settlement and its characteristics and development opportunities.

In our view the current proposed strategy in the Preferred Options Local Plan would stifle growth in and around existing villages, even those with a range of local services and facilities that cater for the daily needs of residents in those settlements (and are consequently included in Tier 4 and Tier 5 of the settlement hierarchy). This approach would result in the delivery of very few new homes in these settlements, which is likely to result in the housing need in these specific settlements and the parishes they are located in not being met, and increases to house prices in these settlements as a result of a shortfall in supply versus demand.

Given that housing affordability is an issue of increasing prevalence and importance in rural areas, and that it is recognised in national policy that some additional housing in rural communities can help support the viability of local services and facilities, the current proposed development strategy would appear to conflict with the broad thrust of national policy to support sustainable rural communities.

The proposed alternative development strategy set out above is therefore considered to be more viable, realistic and deliverable than the one currently being proposed by the Council. The development of more homes within Tier 4 and Tier 5 settlements would help with meeting the Borough-wide housing needs and improving the affordability of homes in those settlements. It would also present opportunities to deliver higher value/executive housing, rather than potentially depend largely on larger proposed housing sites elsewhere, including the new garden community at Meecebrook), and some very limited potential windfall sites within the tightly drawn rural settlement boundaries that are currently proposed, to deliver such new housing that will be needed up to 2040.

Part B6 of Policy 1/the proposed development strategy confirms part of the Borough's housing requirement is to be met through "The permitting of housing on windfall sites within settlement boundaries where applications accord with the policies of this plan". However, in the vast majority of Tier 4 and Tier 5 settlements, the settlement boundaries are drawn tightly around existing homes and other built development that comprise the core of the existing settlements, consequently leaving very limited development opportunities within this strand of Policy 1. Ultimately it is asserted that this would in turn result in a failure to

facilitate controlled, organic growth of – and support for - the sustainable rural settlements in the Borough and thus be contrary to national policy.

It is submitted that a combination of site allocations, and the drawing of settlement boundaries that take account of logical development opportunities within and on the edge of Tier 4 and Tier 5 settlements, is required as part of such changes to the development strategy. The Council is already aware of numerous such development opportunities from previous Call for Sites and Local Plan representations it has received and considered. Indeed, the Council's own Strategic Housing and Employment Land Availability Assessment (SHELAA) identifies and considers many such potential development sites.

As the owner of large areas of land on the east edge of Aston-by-Stone (and beyond/further to the east), Ivanovic and Company Limited have made previous Call for Sites and Local Plan representations to make the Council aware of the availability of their land for development. Furthermore, those representations have identified both the wider area of land in their ownership, and the two areas of land they own that have the strongest potential to accommodate new housing development in a form, location and layout that would amount to logical infill and rounding off development at Aston-by-Stone. The two parcels of land that comprise the latter feature in the Council's latest SHELAA, with site reference SRUR12.

We assert that housing development within this site would comprise a proportionate scale of housing growth of the village and amount to a logical form of development, with a mix of infilling and sensible rounding off of the village. Furthermore, we do not consider that the site has any constraints that would prevent its development.

The characteristics of the site are such that we consider it has potential to accommodate (at the very least) infill development within its two sections that front Aston Lane (comprising gaps between existing built development fronting Aston Lane) and perhaps also in the space between the dwellings known as Gypsy Green and Aston Hill Cottage at the southern end of the site. There may also be potential for some additional development to the rear of such infill opportunities, given that there are examples of existing built development protruding beyond/behind the line of development fronting Aston Lane on this side of the road (including Aston Hall Barn in between the two parcels of land and Selworthy House adjacent to the southern end of the site).

The site could potentially accommodate a variety of types and tenures of housing, subject to the extent of the site that may come forward for development. This includes the potential for self-build plots that may contribute to and complement the existing variety of house types/styles in the village. Given its frontages to Aston Lane, we anticipate that satisfactory access to the site could be achieved to serve its development.

The site's constraints include that there are trees and other vegetation on the site perimeter and in places within the site. However we do not anticipate that the vegetation within the site would prevent development taking place, rather that it is potentially a key merit of the site in terms of providing soft and attractive boundaries to its future development and that - subject to more detailed assessment if/when preparing a development proposal in future (e.g. at planning application stage) - a landscaping scheme could be prepared to ensure the provision of appropriate replacement planting where required and a high quality landscape setting to the development overall.

It is also noted that there is a listed building close by, but it is not considered that this would prevent development taking place. It is acknowledged that care would need to be taken to ensure that any future development within the site is well designed to respect and ensure an acceptable impact on the setting of this listed building.

The SHELAA indicates that the parcels in question are not only available, but also achievable. It also indicates a potential yield of 63 dwellings, but that the site is not suitable due to not being within or adjacent to a currently recognised Local Plan settlement. Regarding that suitability constraint, the development strategy within the Preferred Options Local Plan includes Aston-by-Stone as a recognised 'Tier 5' Local Plan settlement.

It is therefore asserted that the settlement boundary of the village should be amended to include some or all of the two parcels of land the subject of SHELAA site ref. SRUR12 - in addition to the same approach being taken to such logical development opportunities that have been brought to the Council's attention at other Tier 4 and Tier 5 settlements - and thus enable the Local Plan's intention to allow development within settlement boundaries, and at the more sustainable rural settlements within the Borough in general, to result in a meaningful contribution to the delivery of new homes up to 2040.

Further to the above and related conclusions within the SHELAA concerning this land at Aston-by-Stone, it is considered important to take account of the context of this village as part of assessment of this representation, including its proximity to Stone and local public transport connections.

The centre of Aston-by-Stone is just a short distance (circa 0.7 km) from the closest urban edge/area of Stone to the north, which comprises the south east edge of Stone Business Park. To the south of Aston-by-Stone, Stone Hockey and Rugby Club is approximately 0.3km away and Yarlet School approximately 1.5km away.

Given the proximity of the A34 and existing bus stops, Aston-by-Stone also benefits from excellent pedestrian and cycle connections to Stone and public transport connections to Stone, Stafford and elsewhere. The bus stops on both

sides of Stone Road close to its junction with Aston Lane provide a regular service (no. 101) between Hanley - Newcastle - Stone - Stafford.

Consequently Aston-by-Stone is plainly not an isolated rural location, but rather a very accessible village close to the existing urban edge of Stone that presents clear opportunities for new housing on location sites within and on the edge of the village that would comprise sustainable development – not least within the identified land in the ownership of Ivanovic and Company Limited – and asserted that the Local Plan should be revised to enable such sustainable development to come forward over the coming years.

It is also relevant to note that the NPPF (paragraph 69) stresses the important contribution that small and medium sized sites can make to meet the housing requirement of an area, that they are often built out relatively quickly and that LPAs should give great weight to the benefits of using suitable sites within existing settlements for homes. Housing developments of the scale and nature that could be accommodated within our client's site could therefore make an important contribution towards delivering the Borough's development requirements during the plan period of the new Local Plan.

By way of summary, we are of the opinion that our proposed changes to the development strategy - and related site allocations and settlement boundaries at Tier 4 and Tier 5 settlements - are necessary and appropriate for three main reasons:

1. Should the proposed garden community at Meecebrook be removed from the Local Plan as a result of the apparent challenges of delivering it, plus related objections that have been lodged about its feasibility and viability, to provide more homes elsewhere to meet the Borough's housing needs (i.e. make a meaningful contribution to replace the homes that the Council envisaged would have been delivered at a new garden community at Meecebrook in the plan period.
2. In the event the proposed garden community at Meecebrook is retained in the Local Plan, to reduce dependence on the delivery of new homes at Meecebrook.
3. In any event/regardless of which of the two scenarios applies moving forward, to allow for growth in more locations and more spread out across the Borough, including at smaller sustainable, accessible, well-established settlements in the Borough, and to consequently contribute to enhancing rural sustainability.

**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:**

Although we have concerns about the feasibility and viability of Meecebrook, and in particular of it delivering the number of new homes between 2030 and 2040 that the Local Plan depends on, broadly speaking we support the settlement hierarchy.

In particular, we support the inclusion of Aston-by-Stone as a Tier 5 smaller settlement.

However, and as set out in more detail in our response to Question 2 (Policy 1) above, we feel strongly that a major shortcoming and flaw of the Preferred Options Local Plan is the almost complete lack of support and allowance for growth – including new housing – at Aston-by-Stone and other Tier 5 settlements.

The Preferred Options consultation document rightly recognises the sustainability of these settlements, but then fails to take the opportunity to allow any controlled growth of them over the next 17 years. Draft Policy 2 indicates that new development in each tier of the hierarchy will be of a scale commensurate with the position of each settlement in the hierarchy, but the extremely limited potential for growth/development in Tier 4 and 5 settlements that the Preferred Options Local Plan allows for does not fulfil this policy/objective.

In turn, the Preferred Options Local Plan would stifle growth in and around existing villages, even those with a range of local services and facilities that cater for the daily needs of residents in those settlements (and are consequently included in Tier 4 and Tier 5 of the settlement hierarchy). This would conflict with the broad thrust of national policy to support sustainable rural communities, which recognises that some additional development (including housing) in rural communities can help support the viability of local services and facilities.

Consequently (and again as set out in more detail in our comments in response to Policy 1) we submit that, in addition to our proposed revisions to the development strategy, the settlement boundary of Aston-by-Stone should be revised to include logical infill and rounding off development opportunities, such as some or all of the two parcels of land that features in the Council's latest SHELAA, with site reference SRUR12.

**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:

As summarised in our response to Policy 1, we have strong reservations about the feasibility and viability of the proposed new garden community at Meecebrook. In our view there is a flawed over-dependence on the delivery of new homes and employment at Meecebrook in the Preferred Options Local Plan, which unnecessarily risks undermining the plan-led approach to meeting the Borough's development needs in the coming years; particularly given the availability of deliverable alternatives either in place or in addition to new development at Meecebrook within the plan period.

We note from the Council's Local Development Scheme that it envisages submitting the plan for examination during 2024 and that the plan, if found sound, would be adopted around Autumn 2024. Given the time it takes Local Plans to be prepared and examined, it is considered that it is more likely that the plan is adopted during 2025, as invariably, many plans require Main Modifications at examination stage. This would have implications for the timely delivery of a garden community at Meecebrook.

It is noted from the Council's Lead-in Times and Build Rate Assumptions Topic Paper that a development of 500 dwellings or more in the Borough would have a lead-in time of 4.5 years with an outline planning application in place.

For Meecebrook to start delivering homes from 2030, this would require outline planning permission to be in place by mid-2025. A large-scale development of 3,000 dwellings would be EIA development and require substantive technical reports and assessments to be undertaken and carried out prior to the submission of any such planning application for a garden community.



This would require work on preparing a planning application to be commencing now, with a planning application being submitted before the end of 2024. An emerging development plan would carry limited weight in the determination of a planning application until such time that it had passed examination, so the LPA would be unable to determine a planning application favourably until the new Local Plan is nearing adoption.

Following this, any resolution to grant planning permission would need to be subject to the negotiation of a Section 106 Agreement which is likely to be complex and involve a number of landowners before it can be executed and planning permission granted. A further complexity is that a Section 106 Agreement may require the involvement of Network Rail to secure the delivery of the proposed railway station.

Following any grant of outline permission, detailed consents would need to be secured and conditions discharged before any physical works on any phase(s) of development within the site could take place, and it is likely that significant infrastructure would need to be delivered before any dwellings can be delivered as part of the proposed garden community.

Further to this, the Local Plan consultation indicates that the delivery of 3,000 dwellings at Meecebrook would take place between 2030 and 2040, equating to the delivery of 300 dwellings per annum. Given the challenges highlighted above, it is unlikely that 300 dwellings per annum would be delivered at Meecebrook, particularly during the early years of the development.

Added to this, the Council's Lead-in Times and Built Rate Assumptions Topic Paper sets out that build out rate assumptions for developments of 2,000 plus dwellings would be 160 dwellings per annum, but then goes on to suggest that Meecebrook would deliver 300 dwellings per annum without any evidential basis for such an assumption. Even if it was to be accepted that Meecebrook would start to deliver housing from 2030, the Council's more considered build rate assumptions of 160 dwellings per annum suggest that only around 1,600 dwellings would be delivered at Meecebrook during the plan period.

There doesn't appear to be any evidence to demonstrate how the proposed garden community would be phased, whether all landowners within the proposed garden community have made their land available for development, nor has any evidence been presented to demonstrate that a developer or consortium of developers have been appointed or even approached to be development partners for the site. If no developers or consortium of developers are on board as delivery partners, then it would not be possible to ascertain the deliverability of the site and over what timeframe.

Consequently, it is considered that the envisaged delivery of dwellings at Meecebrook from 2030 is unrealistic and that 3,000 dwellings would not be delivered during the plan period. This would undermine the overall development strategy for the Borough with potential implications for the plan-led delivery of housing and employment development.

Turning to some of the specific matters detailed in the Concept Masterplan, the proposed garden community is to deliver a primary school and a secondary school, mixed use areas, commercial uses, and local centres / community hubs, in addition to a railway station.

At this stage, limited evidence has been published to properly explore the deliverability and viability of the above, nor has any evidence been published to demonstrate the deliverability of the proposed railway station. Whilst some technical studies have been produced to establish the feasibility of a railway station in the location proposed, there is no evidence to demonstrate whether:

- Discussions have been held with Network Rail to demonstrate whether they consider a railway station could be provided in this location.
- Discussions have been held with both Network Rail and train operators to demonstrate whether train timetables can be adjusted to accommodate an additional station in this location, and to what extent timetables may be affected by the works and subsequent operation of HS2.
- Other landowners around the vicinity of the proposed railway station have been consulted in terms of ensuring sufficient land is available around the proposed railway station for both the effective operation and maintenance of the railway station and the associated station buildings, platforms, vehicular access, parking, pick-up and drop-off and bus waiting facilities.

We note that the Council has published a questions and answers document which suggests that Meecebrook is not dependent on a station being built and the lack of a station would not automatically result in the proposal being removed from the plan.

Paragraph 73 of the NPPF is clear that new settlements should be served by a genuine choice of transport modes. At this stage, it is not clear how and when rail and bus services would be provided, yet this is a critical consideration here given the limited opportunities for sustainable transport modes that are currently available.

The policy is not clear as to how or when the social and physical infrastructure will be delivered and whether it would need to be in place upon completion of the first phases of residential development. Without any phasing details, the proposal could lead to some unsustainable patterns of development if any services and facilities are not delivered in a timely manner, or elements of the project later become unviable. This would result in a significant number of residents

commuting using private transport to access services and facilities in other settlements that are absent from any new garden community in these circumstances.

As things stand, it is considered that the proposed garden community at Meecebrook would be found unsound at the Local Plan examination. This is the case for the following reasons:

- No justification has been provided to demonstrate that the inclusion of the garden community at Meecebrook is justified when assessed against reasonable alternatives, such as major urban extensions around the larger rural settlements.
- No delivery and implementation evidence is available taking account of relevant information about land ownership, delivery model and infrastructure requirements.
- No robust evidence has been presented to date regarding scheme viability which considers the necessary infrastructure, affordable housing provision, a realistic delivery trajectory and robust cost and value assumptions.
- No robust evidence has been presented to demonstrate that sufficient funding is available and whether or not further external funding is required, such as Homes England or Government funding, whether such funding has been applied for and secured, and whether or not any uncertainty around such funding has been factored into the overall delivery trajectory for the project.

Furthermore, we are aware that it was originally intended for Ministry of Defence land at Swynnerton to form a significant proportion of the proposed garden community at Meecebrook, but that the land in question no longer forms part of the proposed garden community. The land in question comprises previously developed land, which would have been an important factor in its favour when it was considered amongst other reasonable alternatives prior to the Issues and Options consultation in 2020; and ultimately identified as the favoured option at that time. To our knowledge, the process of assessing Meecebrook by comparison to other reasonable alternatives has not been undertaken again following the removal of the Ministry of Defence land.

In light of the above considerations, it is considered that as matters stand, the inclusion of the garden community at Meecebrook would be found to be unsound at examination and the Council would be unable to adopt a Local Plan in its current form.

Consequently, it is submitted that the Council should make alterations to its proposed development strategy and settlement hierarchy/boundaries, as set out in our responses to Question 2 (Policy 1) and Question 2 (Policy 2).

## 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:**

Whilst we raise no objections to the proposed housing and employment allocations within Policy 12, as explained in our response to Question 2 (Policy 1 and Policy 2), we are objecting to the Preferred Options Local Plan on the basis it does not facilitate appropriate/sufficient levels of growth at the sustainable rural settlements in the Borough (as recognised in Tier 4 and Tier 5 of the settlement hierarchy).

Consequently, we submit that the proposed settlement boundaries of those settlements should be amended to enable logical development opportunities within and on the edge of those settlements to come forward to deliver new homes, and/or for those opportunities/sites themselves to be allocated as housing sites.

Our detailed reasoning for this is explained in detail in our responses to Question 2 (Policy 1 and Policy 2) and we shall not repeat that here.

Given the draft wording of Policy 1 (and part B6 in particular) we presume the Council may deem it more appropriate to adjust the settlement boundaries to incorporate such development sites, rather than allocate the sites themselves. If however the Council deem it necessary/appropriate to allocate specific sites in Tier 5 settlements, to enable the controlled growth of these settlements and ultimately enhance the sustainability of the rural area, we propose that some or all of the two relevant parcels of our client's land (as identified in the SHELAA, site ref. SRUR12) are allocated for housing development in Policy 12 and that this policy should be revised accordingly.

**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 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:**

**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](http://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.

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](mailto: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.