

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

**Agents, Developers and
Landowners - Part 5**

Consultation Period: 24 October - 12 December 2022

Published: February 2023

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From: Phil Mason [REDACTED]
Sent: 07 December 2022 09:48
To: [REDACTED]
Cc: SPP Consultations; Strategic Planning
Subject: SBC Local Plan 2020-2040 Preferred Options Consultation 07.12.2022
Attachments: Local Plan Preferred Options Response 07.12.2022.pdf

Dear [REDACTED]

Please find attached our comments regarding the Preferred Options Consultation – Local Plan 2020-2040. A total of 14 pages.

If you would like the plans sending separately for ease of reference, please let us know.

Please will you forward a receipt email.

A hard copy will be hand delivered today.

Many thanks
Phil and Helen Mason.

Phil & Helen Mason,

Forward Planning
Stafford Borough Council
Civic Centre
Riverside
Stafford
ST16 3AQ.

Date: 7th December 2022.

Dear Sir,

RE: SBC LOCAL PLAN 2020-2040 PREFERRED OPTIONS CONSULTATION

Further to our letters dated the 28th December 2017 and 14th March 2022 (attached for ease of reference) we would be grateful if this further information is taken into account in the Preferred Options Consultation process.

Firstly, your site 06A detailed as land south of The Cottage has no connection with this property and we believe it is part of the property known as No2 Mount Pleasant. Please would you amend this entry.

We note from the Boroughs preferred consultation document (SHELAA ID Code: HIG08) that the land is classified as Greenfield, but as you will see parts of the land would be classified as a Brownfield development (see attached plan 04). This Brownfield area was previously detailed to the Borough in our attached letter as mentioned above and dated 14th March 2022 and as thus should have been included in SBC preferred local plan in line with Government Policy.

We also note from the Boroughs preferred consultation document (SHELAA ID Code: HIG08) that our land has been excluded solely based on the site having no access to the public highway. This is totally incorrect as the site has access to Glebefields where a fully constructed road with a pavement(s) is achievable (see attached plan 01), although we appreciate this may not have been apparent if it has been viewed from the highway.

When we sold the land for the Glebe Meadow housing development we were mindful for the potential of future development on our other lands and therefore retained sufficient land in our ownership and a full right of access over part of Glebe Meadow roadway (see attached plan 02 as registered with the Land Registry). In addition, we have planning permission for a two-storey double garage but after the construction of the footings/base we elected to construct a removable garden building to allow for ease of any highway development. The garden building currently sits on the edge of our property adjacent to the Glebe Meadow road. Its also worth pointing out that without the use of the Glebe Meadow access there is still sufficient space on our owned land (see attached plan 01a) this would also provide a suitable access with our main drive then coming off any new development access.

In addition, we have full ownership of the grass highway frontage verge adjacent to the pavement (see attached plan 03 as registered with the Land Registry).

As you will see from plans 01 and 01a we have all the access rights to allow any future development to construct a deliverable highway/walkway as a natural continuation of Glebefields.

Glebefields Cul-de-sac is a twin footpath highway which is under utilised with an extremely low hourly traffic rate and therefore would easily cope with a much larger development.

Taking all the points above into consideration we believe that an access for a large or small development off Glebefields is very deliverable and site HIG08 should be considered further for development and if the land were to be included in the local plan then any development including a suitable highway connection, will be judged by an appropriate planning decision.

As you are already aware we put forward all of our land in the call for sites process for consideration in our letters dated the 28th December 2017 and 14th March 2022, however the neighbourhood plan (unadopted) called for smaller sites to be put forward and the site shown on plan 05 and 07 was approved by High Offley Parish Neighbourhood Plan (HOPNP). All of the sites put forward in High Offley Parish Neighbourhood Plan (HOPNP) went through a lengthy, thorough and vigorous consultation process with final approval by the HOPNP committee, followed by approval of the Parish Council. Several drafts were scrutinised by your good self and SBC Planners and the final plan was then approved by SBC before submission to the government inspector/examiner.

We would also like to draw your attention to Plan No 6 which shows a development approved by the High Offley Parish Council Neighbourhood Plan Committee which is also in our ownership. As you will see the plan shows an area for a car park extension which the owners of The Cock Inn have contacted us about. Including this provision in the Local Plan would help to alleviate parking issues in the village and on the main A519.

All of the land in question is well drained and the existing village surface water pipe passes through it which has plenty of spare capacity. It flows in to the main stream which is also within the property boundary. The land has existing high voltage electricity already in situ, plus a spare duct is already in place to the sub-station in Glebefields. Glebefields Cul-de-sac is on the end of an existing full size water main which has a large capacity and pressure. The village main sewer runs down our fields which gives direct access for any sized development. All of these immediate services adds to any deliverable requirements for a suitable development.

We have also attached Plan 08 which shows the Greenfield area of our land put forward in the original Call for Sites consultation process for ease of reference.

Taking into account all of the above proposals and that the area keeps any development within the central part of the village and has little effect on the majority of the village, it would indicate that this area is very deliverable if included in the forthcoming borough plan and planning was then approved.

On a separate note, in line with the wishes of many of the parishioners, we do not want to see a large, incongruous housing development behind Woodseaves village school, but would not be totally opposed to a small development in keeping with that set out in the High Offley Neighbourhood Plan (unadopted).

Yours sincerely



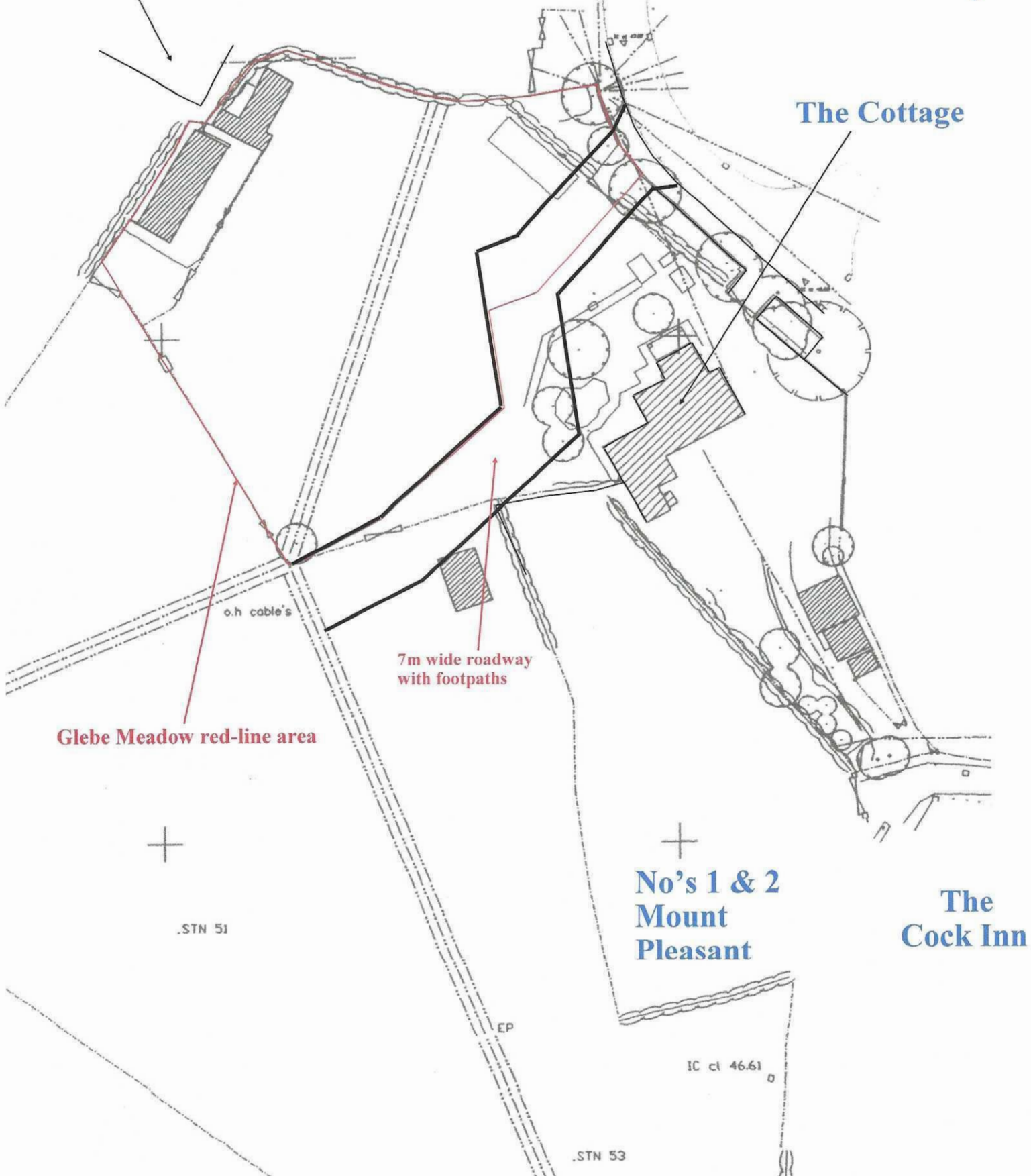
Phil & Helen Mason

Enclosures: Letters dated 28.12.2017 & 14.03.2022 and 9 Plans.

Longacre

Glebefields

The Cottage



Glebe Meadow red-line area

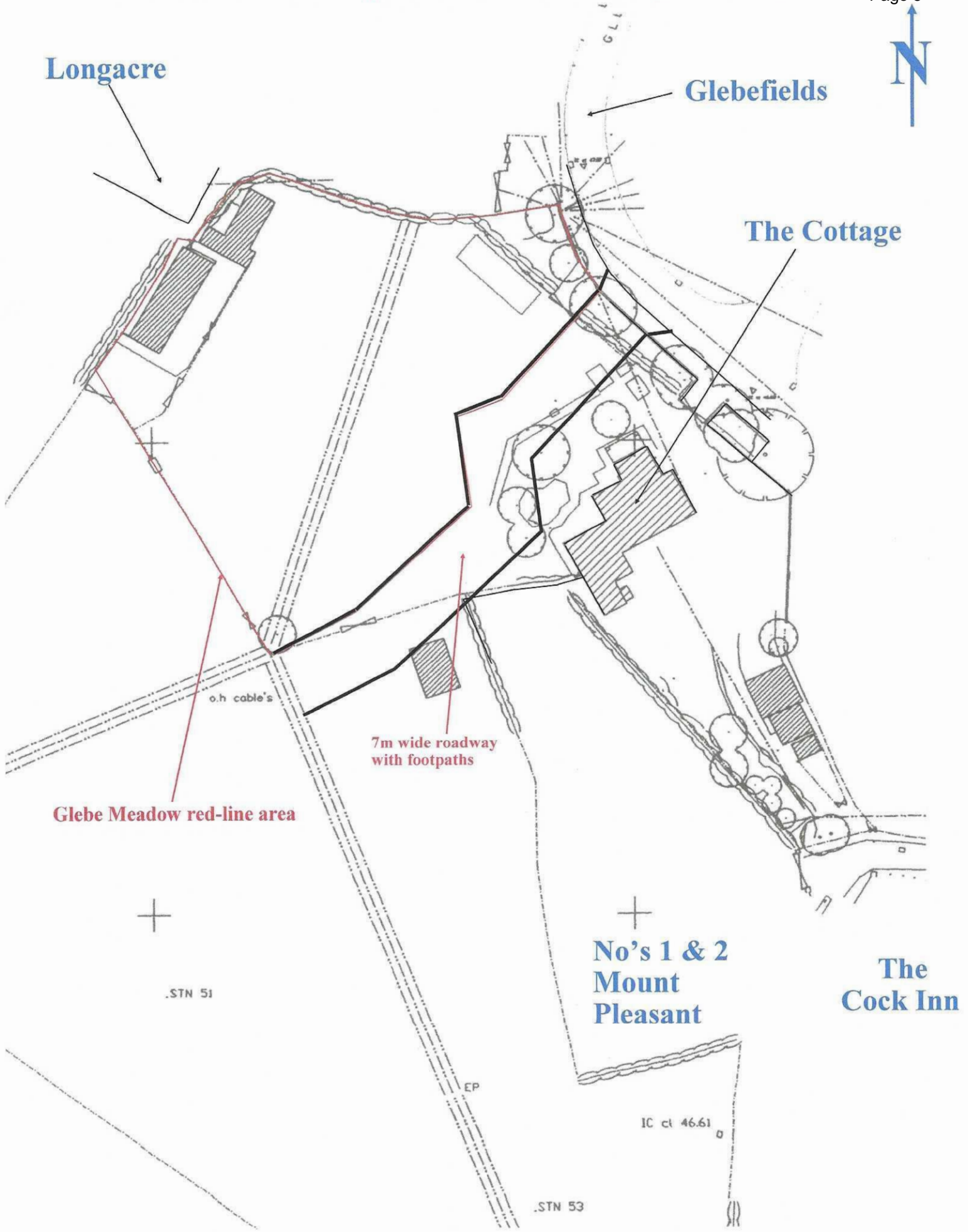
7m wide roadway with footpaths

No's 1 & 2
Mount
Pleasant

The
Cock Inn

Scale 1:500

PLAN 01



Longacre

Glebefields

The Cottage

Glebe Meadow red-line area

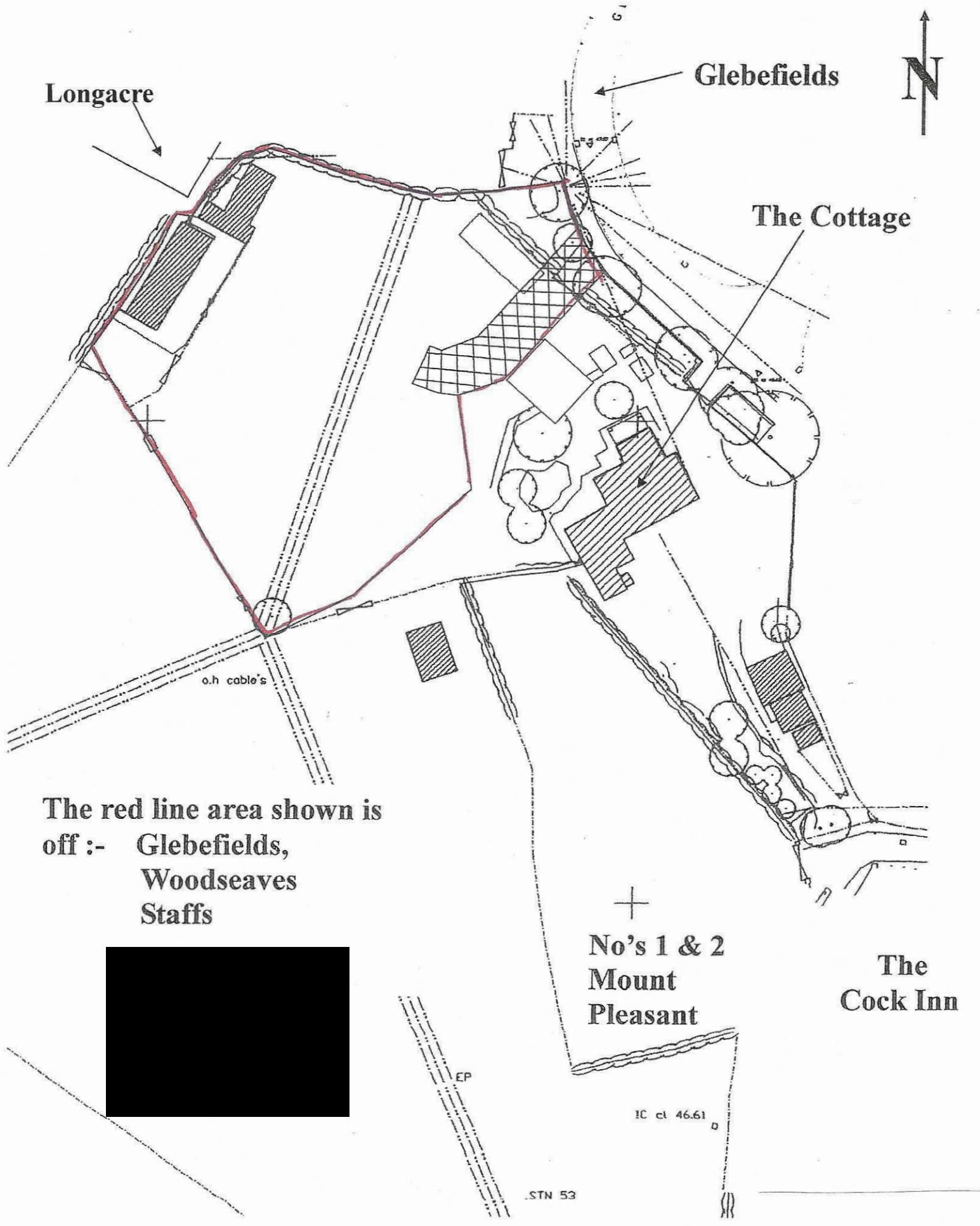
7m wide roadway with footpaths

No's 1 & 2
Mount
Pleasant

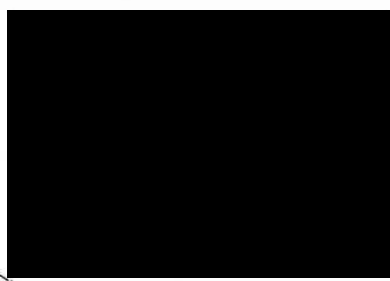
The
Cock Inn

Scale 1:500

PLAN 01a



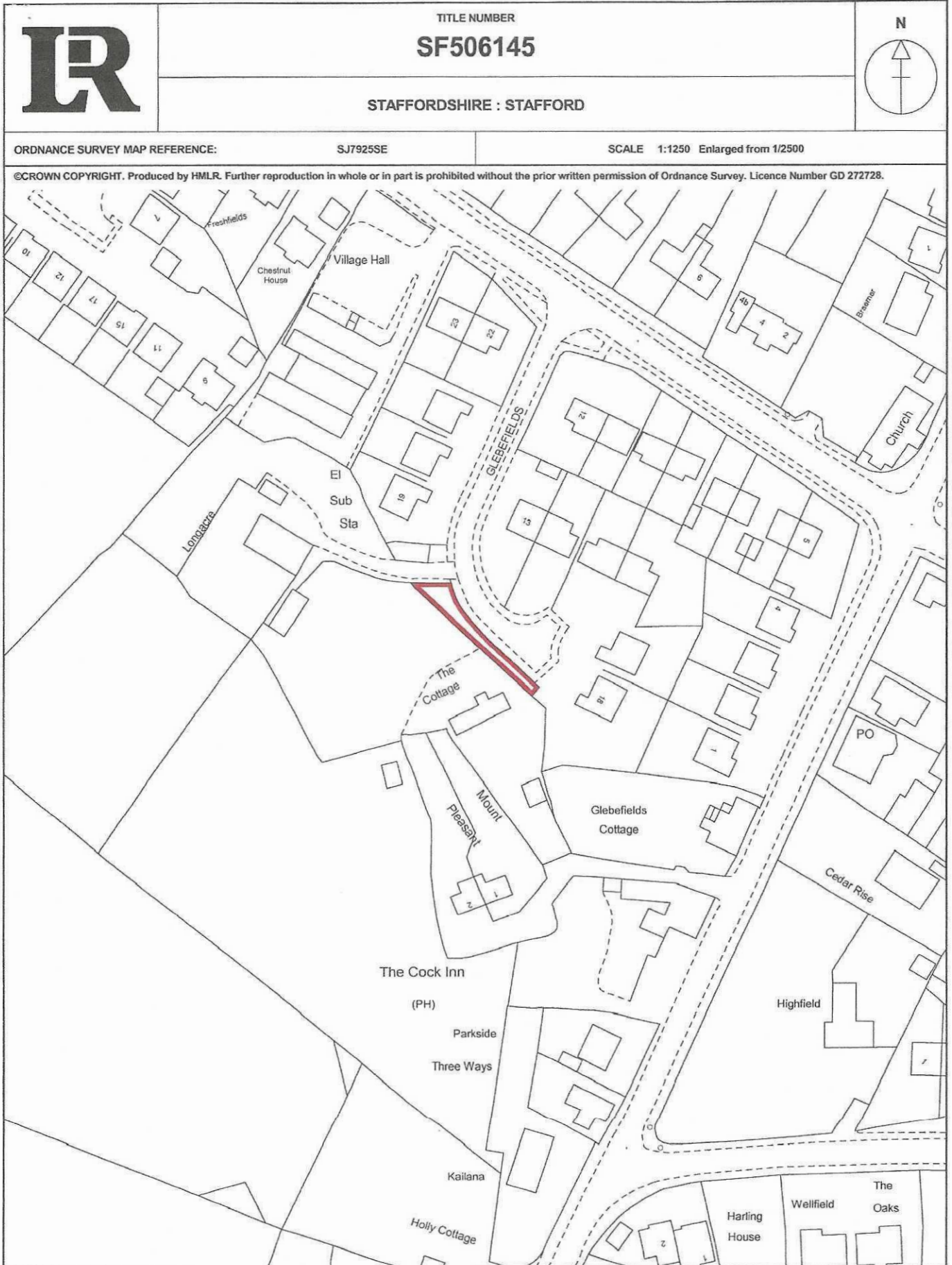
The red line area shown is off :-
Glebefields,
Woodseaves
Staffs



Scale 1:500

Part of the land sale documents to Ruston Homes Ltd and registered at the Land Registry, 1st February 2006.

PLAN 02



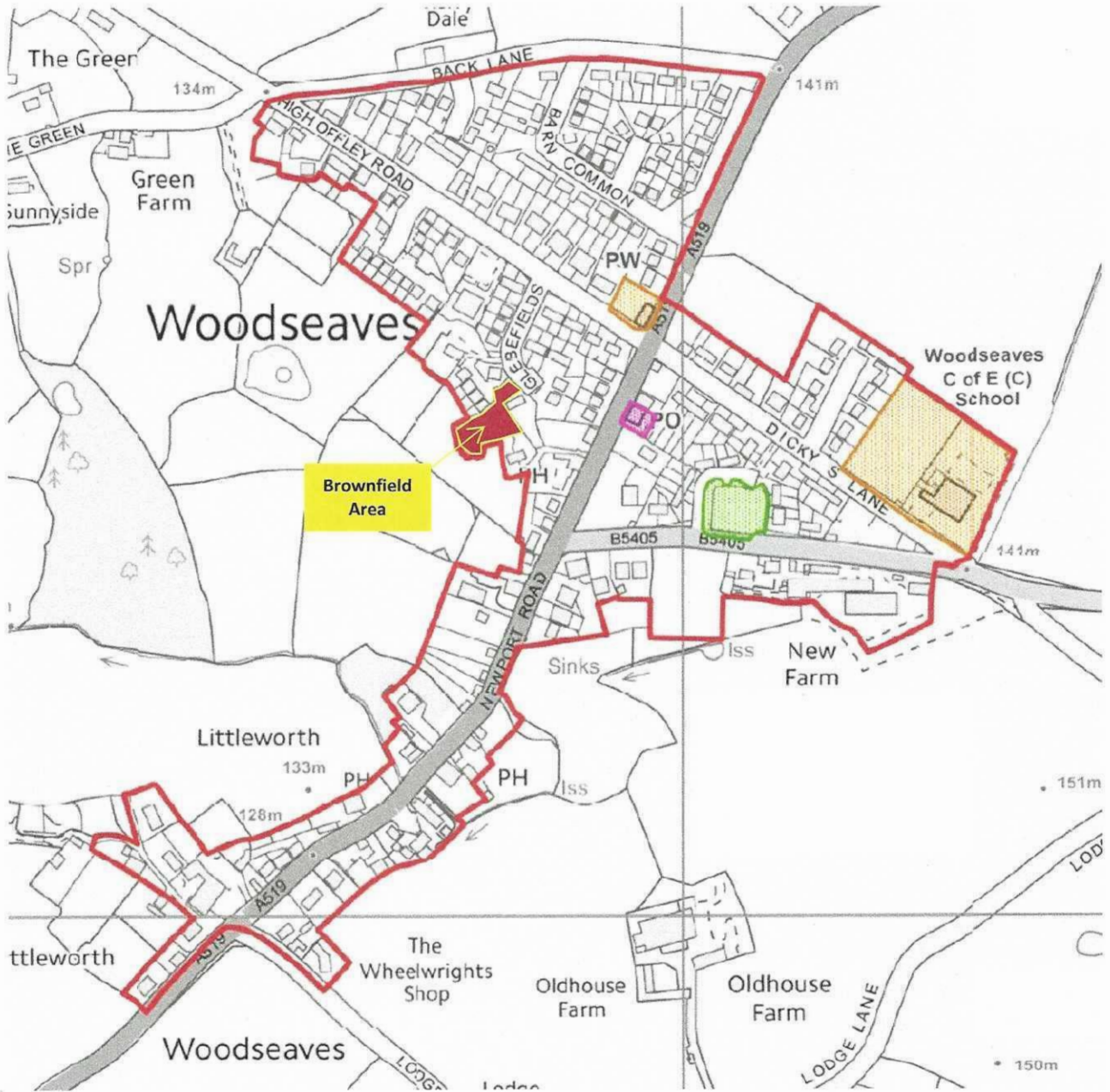
This title plan shows the general position of the boundaries: it does not show the exact line of the boundaries. Measurements scaled from this plan may not match measurements between the same points on the ground. For more information see Land Registry Public Guide 7 - Title Plans.

This official copy shows the state of the title plan on 3 April 2006 at 9:34:48. It may be subject to distortions in scale. Under s.67 of the Land Registration Act 2002, this copy is admissible in evidence to the same extent as the original. Issued on 3 April 2006.

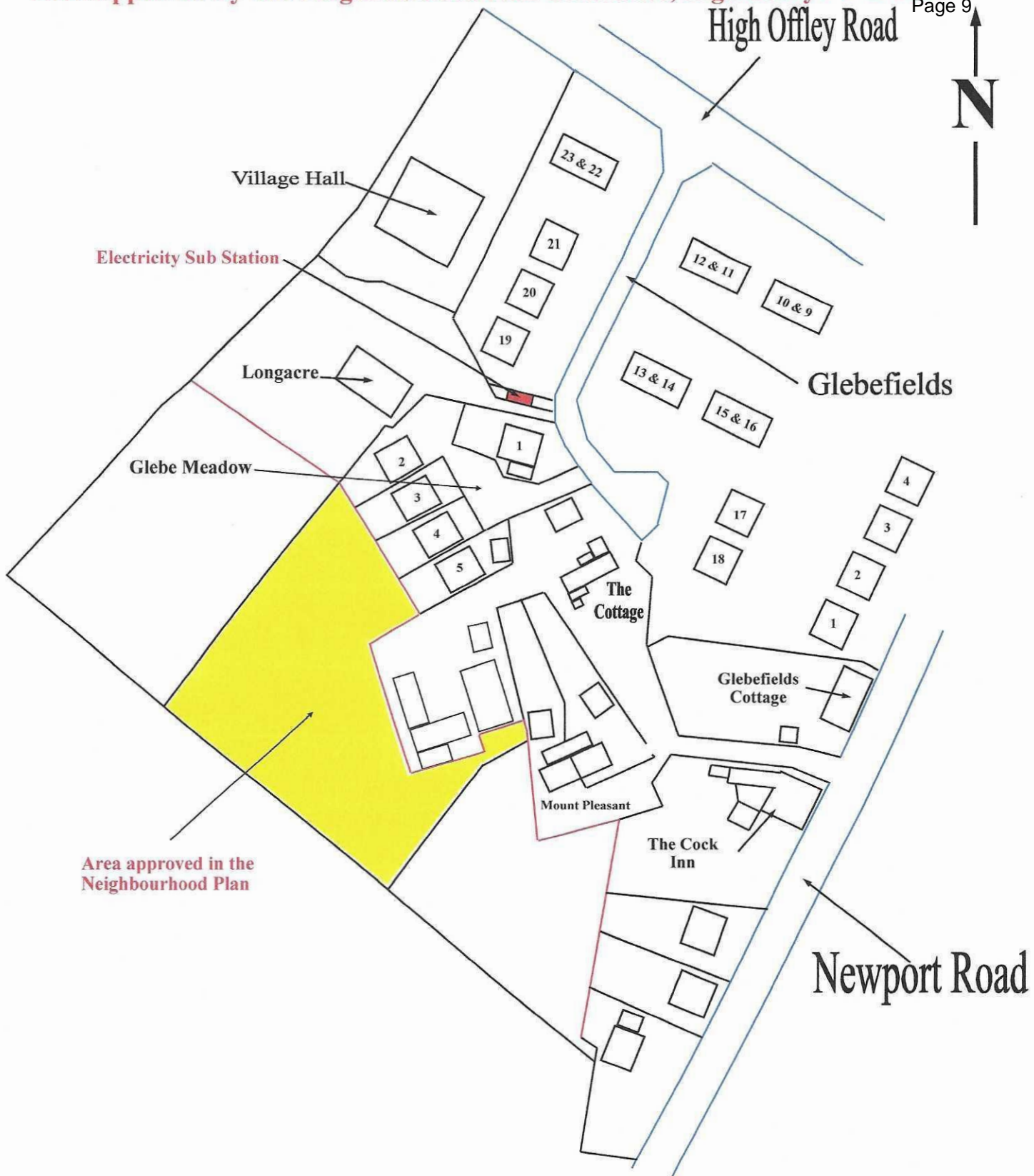
This title is dealt with by the Birkenhead (Old Market) District Land Registry.

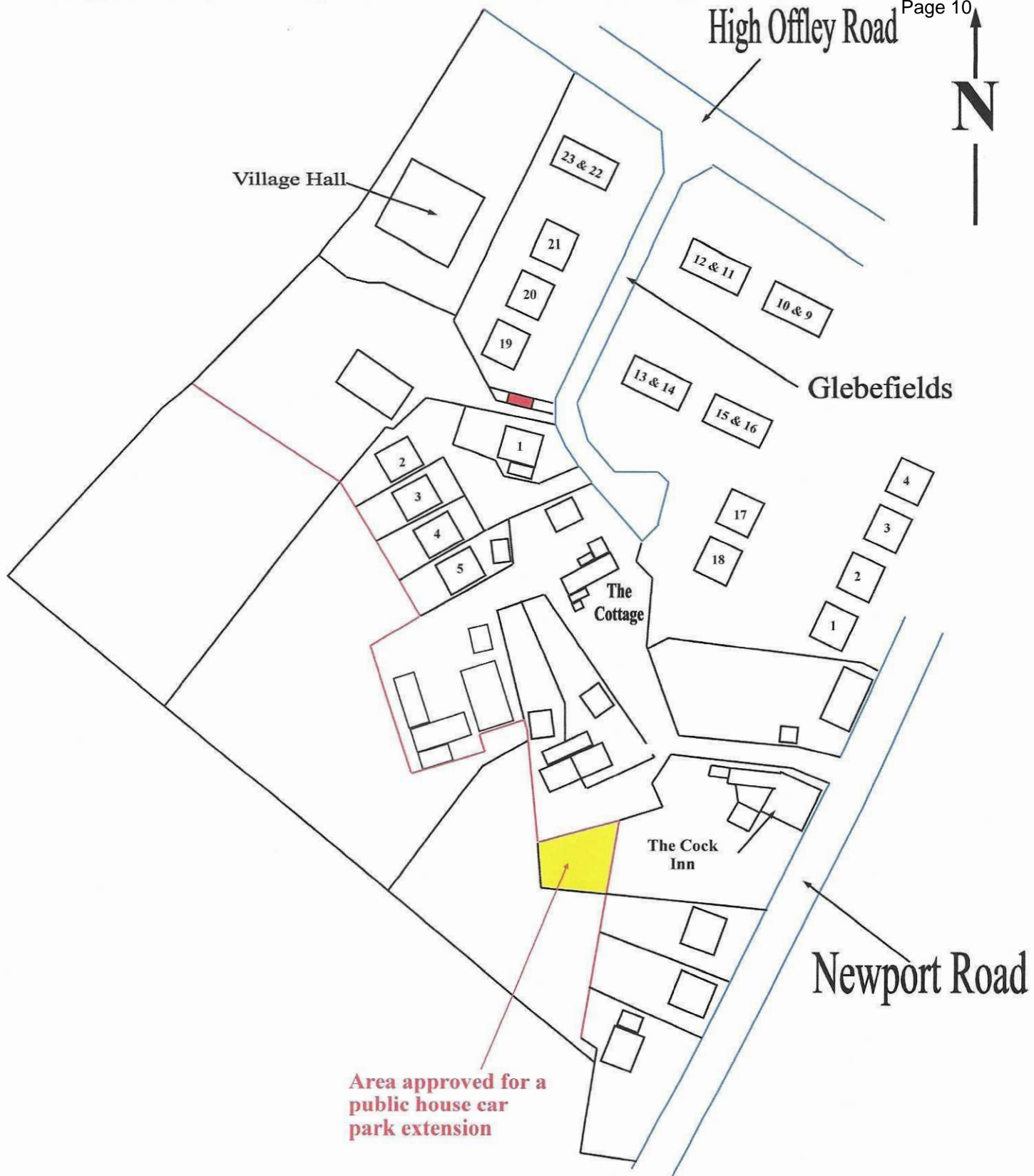


THE COTTAGE ST20 OLA - BROWNFIELD LAND



PLAN 04





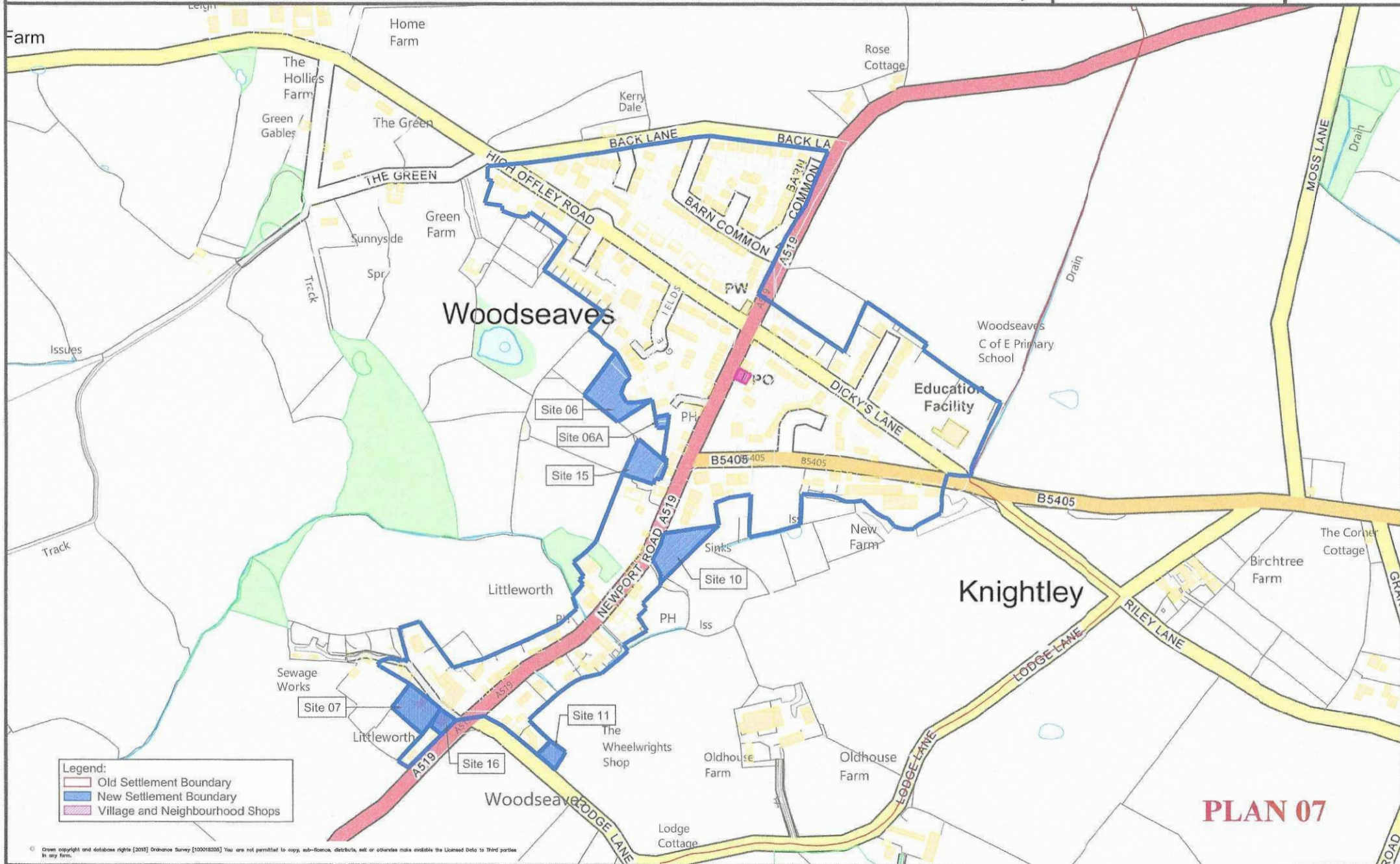
High Offley Parish Council Neighbourhood Plan

Woodseaves Settlement Boundary

Not to scale

Date: March 2019

Page 11

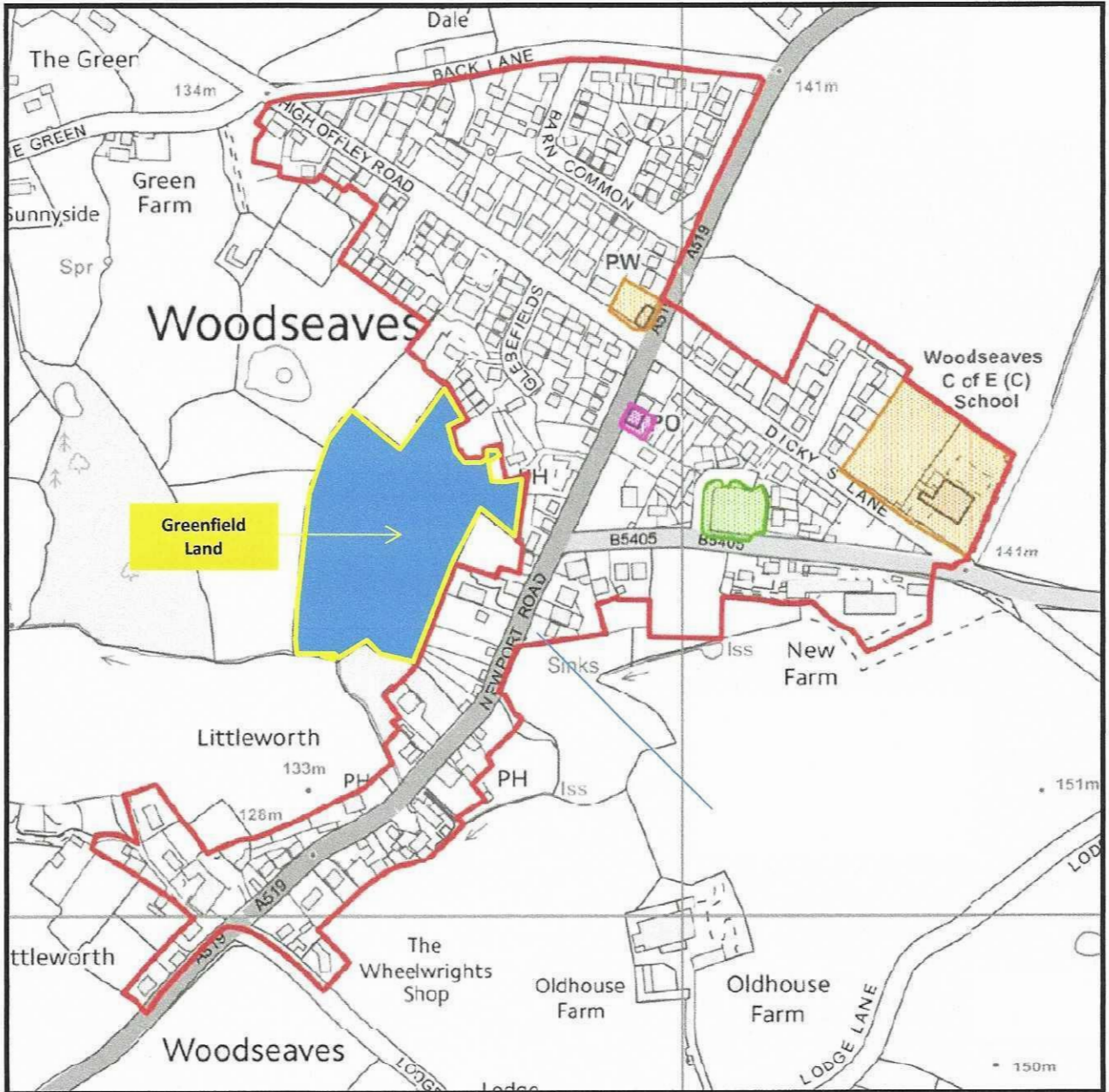


Legend:
— Old Settlement Boundary
— New Settlement Boundary
■ Village and Neighbourhood Shops

PLAN 07

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THE COTTAGE ST20 OLA – GREENFIELD LAND



Phil & Helen Mason,

Forward Planning
Stafford Borough Council
Civic Centre
Riverside
Stafford
ST16 3AQ.

Date: 28th December 2017.

Dear Sir/Madam,

RE: SBC - CALL FOR SITES - WOODSEAVES.

We have lived in the village of Woodseaves for over 25 years and subsequently we both consider that we know our village and its surroundings quite well. We are aware that proposals have been put forward for further housing development in Woodseaves. There has been relatively little development in the village within our time here with Woodhaven being the first block of new houses to be built. Blackberry Way and Bridge Court have followed. Bridge Court can only be described as a carbuncle in the village and being on the main road is unavoidable to the eye. It is not in keeping with neighbouring properties and should never have been built. Glebe Meadow is the latest small development of five houses which is sympathetically sited in relation to the village and surrounding landscape.

Woodseaves tends to be linear in its original development and further development needs to take this into consideration. This rural village needs growth without spoiling any further what we have and this is what concerns us.

Looking at the proposed sites the large blocks of land to the East would, if developed, totally alter the visual impact of the village from all aspects. All the land is visible from or is adjacent to the A519 and would eradicate the existing linear development in that area of the village. .

Land to the west of the village could easily accommodate further housing development with little or no visual impact on the surrounding countryside, existing properties or traffic on the A519. In particular, the land west of Newport Road the A519 (area WO – 5 as per attached plan) ticks all the boxes in respect of planning requirements and future development. This land has been previously selected and put forward by the Borough Council as being suitable for future housing development.

We consider that this land, is the most suitable and appropriate area to be developed.

Future development will help keep our village alive. It will help us keep our school, our Post office and shop, our village hall, churches and chapel and our one remaining public house and possibly extend growth in these areas.

In conclusion, our village needs growth to go forward but let's make sure it's in the right place, sympathetic to existing properties and visually unobtrusive.

Yours sincerely



Phil & Helen Mason

Phil & Helen Mason

Forward Planning
Stafford Borough Council
Civic Centre
Riverside
Stafford
ST16 3AQ.

Date: 14th March 2022.

Dear Sir/Madam,

RE: SBC - CALL FOR SITES - WOODSEAVES.

Further to our letter dated the 28th December 2017 (attached for ease of reference) we would be grateful if this further information is taken into account in the sites selection process.

Firstly, we would like to indicate our ownership and rights of way off Glebefields, Woodseaves which makes our land a deliverable proposal for a small or large development, please see plans 1 and 2 attached.

Plan 1 – shows a 6m section of Glebe Meadow which we have an unlimited use/full right of way.

Plan 2 – shows our other land outside the red-line (Brownfield), including the strip of land up to the highway footpath and the bottom half of the gardens that were formerly Mount Pleasant cottages, both of these are within our ownership. As you will see it also shows there is ample land to provide a suitable, deliverable access.

Taking into account the information detailed on the above plans there would be more than sufficient space to provide a deliverable, suitable access including a footpath.

We would also like to point out that when Glebe Meadow was approved the County Highways sent us a letter stating that Glebefields was suitable for more than the 5 houses currently built in Glebe Meadow.

Secondly,

Plan 3 – We are aware that our neighbour () has put his land forward (see Plan No 3) for development consideration. Following a recent discussion with him we can confirm that he is willing to consider a joint development whereby our land could be accessed from the main A519 therefore making a small or larger development more deliverable.

We would also like to draw your attention to Plan No 4 which shows a development approved by the High Offley Parish Council neighbourhood plan committee. As you will see the plan shows an area for a car park extension which the owners of The Cock Inn have contacted us about.

All of the land in question is well drained and the existing village surface water pipe passes through it and has plenty of spare capacity. It flows in to the main stream which is also within

the property boundary. The land has existing high voltage electricity already on it, plus an existing spare duct is already in existence from the sub-station in Glebefields. Glebefields is on the end of an existing full size water main which has a large capacity and pressure. The village main sewer runs down our field which gives direct access. All of these immediate services adds to any deliverable requirements for a suitable development.

Taking into account all of the above proposals and that the area keeps any development within the central part of the village and has little effect on the majority of the village it would indicate that this area is very deliverable if included in the forthcoming borough plan and planning was then approved.

Yours sincerely

A large black rectangular redaction box covering the signature area.

Phil & Helen Mason

From: Preferred Options Consultation [REDACTED]
Sent: 09 December 2022 21:44
To: Strategic Planning Consultations
Subject: Preferred Options Consultation - Submitted Response

Full name: **Meecebrook Programme Board**

Email: [REDACTED]

Agents and Developers

Organisation or Company: **Multi-agency Partnership Board**

Age: **Prefer not to say / not applicable**

Added to database: [REDACTED]

Topics (Contents page): **No reply**

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 reply**

Comments: **We support the number of homes and quantum of employment land identified as part A of this policy (10,700 new homes and at least 80 ha of employment land over the plan period). We consider that the scale of need identified, which acknowledges the importance of providing additional homes to accommodate the growing population which is needed if the Borough is to meet its economic ambitions, represents a sustainable and pragmatic approach to growth over the plan period. With specific regard to Meecebrook and the role that it will play in meeting housing need which arises from neighbouring local authorities; we are supportive but would note that clearly housing market geographies are flexible. The allocation of Meecebrook will ensure that there is the choice and depth of housing supply across the Borough so that future residents – whether opting to move into the area to fulfil local jobs or because of more limited supply in surrounding areas. It should be clarified in the supporting text (para. 1.4) to Policy 1 that Meecebrook Garden Community will form part of the overall housing land supply to meet Stafford need as a whole rather than specifically as means of addressing unmet need from other authorities. We are supportive of the allocation of 3,000 homes at Meecebrook within the plan period outlined in Part B and restated under**

Parts C and E. Similarly, in relation the 15 ha of employment land allocated to Meecebrook in Part D, this is welcomed. However, we also note that the overall quantum of employment land in Policy 1 (80 ha) is identified as a minimum; such that as further work is undertaken on the type of community that is likely to come forward at Meecebrook, should more employment land be demonstrated to be appropriate, this is something that we would support in policy terms.

Policy 2 (Settlement Hierarchy): No reply

Comments: We welcome the inclusion of Meecebrook within the settlement hierarchy included as part of this draft policy. We agree that it is appropriate that it sits beneath established places such as Stafford and Stone; however, we consider that it would be helpful to provide definition on the distinction between different rungs of the settlement hierarchy in terms of their relative roles and functions. This will be important over the longer-term to ensure that development is appropriate directed and that the inter-relationship between Meecebrook Garden Community and the existing settlements, including Cold Meece (Tier 5), Eccleshall (Tier 4) and Yarnfield (Tier 4), is clear.

Policy 3 (Development in open countryside): No reply

Comments: No reply

Policy 4 (Climate change and development requirements): Yes

Comments: We are supportive of the requirement for new development to take a positive approach to climate change and consider that the Meecebrook Garden Community, as a planned new settlement, will be able to incorporate these principles within its approach to design. We will be providing further evidence on this matter as part of our Net Zero Carbon Assessment which will be providing to the Council at or in advance of the Regulation 19 consultation.

Policy 5 (Green Belt): No reply

Comments: No reply

Policy 6 (Neighbourhood plans): No reply

Comments: No reply

Meecebrook Garden Community

Q3 - Do you agree with proposed new garden community: Yes

Comments: We support the proposed new garden community and have been working over the last four years to develop a robust and sustainable proposition that can play a vital role in meeting the Borough's housing needs and provide valuable economic opportunities across the plan period and beyond. Alongside this consultation, we welcome the publication of the Meecebrook Vision*, together with concept masterplan, as well as several elements of the emerging transport evidence base on rail feasibility and transport strategy. Part B of Policy 7 sets out that at least 3,000 homes will come forward within the plan period, with the potential to deliver c. 6,000 over the longer term. We are supportive of this approach and, in

line with paragraph 22 of the NPPF, welcome the reference to the longer-term delivery timeframe for Meecebrook. As part of developing the evidence base for the new settlement, we have and are undertaking detailed infrastructure delivery planning, market analysis and viability work to develop a robust trajectory which will demonstrate how at least 3,000 homes will come forward over the plan period. We recognise that the submission of this work will be important for the Council and its ability to demonstrate at examination stage that there is a deliverable housing land supply; our current intention is that we will provide this further evidence to support the Regulation 19 consultation but will continue to engage with the Council on this point in advance of that. Part C of Policy 7 outlines the principles for employment provision as part of the Garden Community. This is supported; however, there is also reference within this part of the policy to a requirement to provide employment space within the new town centre. This should be removed as it repeats elements that are more appropriately covered under Part D which deals specifically with the role, function and suggested mix within the new town centre. Further, given the recent changes to the Use Class Order and creation of Class E which includes employment uses which would typically be found within a town centre, it is more appropriate that town-centre focused employment is captured under the NPPF definition for 'main town centre uses' which includes those relevant elements of employment (namely offices) and would be covered by the specification that the centre should comprise a mix of uses. In addition, Part D of Policy 7 sets out a number of components which are deemed to act as a focus and creating an identity for the new settlement. While we are supportive of most of these, we consider the reference to a dentist as part of health care facility to be unnecessarily prescriptive, particularly as dental provision is largely met by the private sector and is not something that would typically be found within a modern health centre. We are concerned that this requirement could impinge on the ability to ensure that a health centre is delivered as part of the development. We are working on completing a full Health Impact Assessment which will support our evidence and direct design and delivery, we intend to provide this to the Council before or during the consultation attached to Regulation 19. Part F of Policy 7 sets a cap on the total retail floorspace and within that the level of convenience retail floorspace across the new settlement. We have reviewed the evidence base published alongside this consultation, including the Town Centre Capacity Assessment for Stafford Borough 2019, and cannot establish the basis upon which these figures have been derived. We therefore request that these figures are removed pending either production of evidence as part of the next stage of consultation or that the policy refers to a requirement within the application for a new town centre to demonstrate the acceptability of the level of retail provision. This reflects the fact that the retail market is very dynamic and the need for flexibility is paramount in ensuring the creation of a vital and viable town centre. It will be some years before the town centre retail provision is delivered and the policy position needs to be futureproofed to allow market conditions and shopping patterns at that time to be best accommodated. In relation to Part G of the Policy 7, we welcome the publication of the rail feasibility work* alongside this publication. As set out in the Vision document, a new railway station on the West Coast Main Line is a 'key aspiration' and Meecebrook Programme Board is continuing to work with key stakeholders such as Network Rail to ensure that this aspiration is deliverable. We would welcome the opportunity to refine the information, supported by evidence, in relation to the location of a station and the detail of that provision at the conclusion of the Strategic Outline Business Case which is underway. This information will be available on or before publication of the Regulation 19 plan. Linked to this, Parts L and M of the Policy 7 set out that it is only once a route to the funding and delivery for the range of infrastructure items identified in the indicative infrastructure delivery schedule has been established within a Framework Masterplan Supplementary Planning Document (SPD) that development can commence. Further, Part N of Policy 7 requires that Meecebrook 'must come forward comprehensively' and refers to the

Meecebrook Framework Masterplan SPD. We agree that this approach is appropriate in principle, not least because of the long-term nature of delivery of this large-scale development and need to ensure that the costs and associated risk mitigation around delivering the required strategic infrastructure is enshrined within an SPD. We will continue to engage with the Council on the development of infrastructure delivery strategy and anticipate providing further information which will provide greater delivery certainty to support the Regulation 19 consultation and the development of any future SPD. Policy 8 relates to masterplanning and design at Meecebrook. We welcome the overall approach articulated in the draft policy. While we note that Appendix 9 (Meecebrook Garden Community concept masterplan, design and development principles and infrastructure delivery schedule) has not been published as part of this consultation, the concept masterplan and Vision has been published alongside the draft plan. The Meecebrook Garden Community Programme Board is continuing to develop the design principles and the infrastructure delivery schedule so that they can be published alongside the Regulation 19 consultation. *Please see links to documents in the final comments box of this form

Site Allocation Policies

Q4 - Do you agree with the proposed allocations?

Policy 9 (North of Stafford): **No reply**

Comments: **No reply**

Policy 10 (West of Stafford): **No reply**

Comments: **No reply**

Policy 11 (Stafford Station Gateway): **No reply**

Comments: **No reply**

Policy 12 (Other housing and employment land): **No reply**

Comments: **No reply**

Site Allocation Policies (continued)

Q5 - Do you agree with the proposed allocations?

Policy 13 (Local Green Space): **No reply**

Comments: **No reply**

Policy 14 (Penk and Sow): **No reply**

Comments: **No reply**

Policy 15 (Stone Countryside): **No reply**

Comments: **No reply**

Economy Policies

Q6 - The local plan seeks to protect previously allocated and designated industrial land and support home working and small-scale employment uses. Do you agree? **No reply**

Comments: No reply

Q7 - The Stafford Borough Plan proposes policies around the town centres uses, agriculture and forestry development, tourism development and canals. Do you agree? **No reply**

Comments: **Policy 19 (Town centre and main town centre uses) identifies Meecebrook within the hierarchy of centres for the Borough. As set out in our response to Question 4, this designation is welcomed. However, there are some inconsistencies in the policy which require resolution. Specifically, under Part E, Meecebrook town centre is identified as sitting below Eccleshall local centre in the hierarchy of centres. This is not consistent with the settlement hierarchy set out in draft Policy 2 where Meecebrook is identified as Tier 3 settlement, above Eccleshall as Tier 4 larger settlement. This should be amended to align with Policy 2 and, in common with the comments we made on Policy 2, a description of the role and function of town centres versus local or neighbourhood centres should be provided in the glossary. In relation to Part C of the policy which precludes single units of no greater than 200 sqm tradeable floor area in tier 4 and 5 settlements, there is again some inconsistency with the parameters set out in draft Policy 7 of Meecebrook which makes specific provision for elements such as an anchor food store. Notwithstanding the specific inconsistencies between the draft policies, we question whether this policy is suitably evidenced as it reduces the ability of town centres to evolve flexibly in response to market conditions so that their long-term vitality and viability is preserved. We therefore suggest that it is removed.**

Housing Policies

Q8 - The local plan proposed a policy (23) on affordable housing. Do you agree? **No reply**

Comments: **The role of Meecebrook Garden Community in delivering affordable homes is recognised and as part of the developing the vision and concept for the new settlement, we have been undertaking the necessary viability work to ensure that it will be deliverable within and beyond the plan period. Testing affordable housing provision has formed an important part of this and as we undertake further work, we will be looking to work closely with the Council to ensure that Meecebrook can comply with this policy. The infrastructure requirements and delivery strategy for Meecebrook is obviously closely related to the viability work and given the requirement set out in Policy 7 for the funding and delivery route for key infrastructure to be agreed in advance of development commencing at Meecebrook, we reserve the right to provide further evidence at the Regulation 19 stage on this topic in the event a more bespoke approach is required at Meecebrook than the percentages of affordable homes in different parishes outlined in Part A of draft Policy 23.**

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: The role of Meecebrook Garden Community in delivering affordable homes is recognised and as part of developing the vision and concept for the new settlement, we have been undertaking the necessary viability work to ensure that it will be deliverable within and beyond the plan period. Testing affordable housing provision has formed an important part of this and as we undertake further work, we will be looking to work closely with the Council to ensure that Meecebrook can comply with this policy. The infrastructure requirements and delivery strategy for Meecebrook is obviously closely related to the viability work and given the requirement set out in Policy 7 for the funding and delivery route for key infrastructure to be agreed in advance of development commencing at Meecebrook, we reserve the right to provide further evidence at the Regulation 19 stage on this topic in the event a more bespoke approach is required at Meecebrook than the percentages of affordable homes in different parishes outlined in Part A of draft Policy 23.

Design and Infrastructure Policies

Q11 - Do you agree with policies? **Yes**

Comments: We are supportive of the overall approach set out in these policies and refer the Council back to our response to Q3 for more detail as to how that relates to Meecebrook specifically.

Environment Policies

Q12 - Do you agree with policies? **No reply**

Comments: We are supportive of the principles outlined in Policies 41, 42, 44, 47 and 49. As part of our continuing work on developing a robust and evidenced proposition for Meecebrook Garden Community, we are preparing an Air Quality Assessment, Archaeology and Heritage Assessment, Flood Risk Appraisal, Water Resources Scheme for Meecebrook, Waste Water Infrastructure and Non-Infrastructure Requirements, Landscape Character and Visual Impact Assessment, Preliminary Ecological Assessment, HRA Phase 1 Screening and Arboricultural Study which we will be submit to the Council before or as part of our representations to the Regulation 19 consultation on the draft Local Plan. We provide a full schedule in our response to Q14/15. There is some overlap between these draft policies and the requirements outlined in draft Policy 7 for Meecebrook. We have provided detailed comments on these in Q3 response.

Connections

Q13 - Do you agree with policies? **No reply**

Comments: As outlined in our Q3 response, several key pieces of evidence on transport matters at Meecebrook* have been published alongside this consultation. These reports provide key evidence on how Meecebrook will deliver on the Vision document's development charter items of making walking and cycling 'the natural choice' and putting cars 'in their place'. As such, we support the principles outlined in Policies 52 and 53 and will look to

supplement our evidence on transport planning matters to ensure that Meecebrook can meet these requirements. *Please see link to documents in the final comments box of this form

Evidence Base

Q14 - Have we considered all relevant studies and reports? **No reply**

Comments: **Please see response to Q15**

Q15 - Do you think there is any further evidence required? **No reply**

Comments: **We consider that the Council has provided an appropriate level of detail on most points to support this Regulation 18 consultation. However, we have outlined below a number of pieces of evidence relating to Meecebrook Garden Community that we will continue to work on as the plan advances towards Regulation 19 consultation, with the intention of sharing these with Council at or in advance of that consultation. These are as follows (please note that all may not be delivered but this is an aspiration as we complete our evidence base ensuring it is relevant and up to date):**

- Air Quality Assessment
- Arboriculture Study
- Archaeological and Heritage Assessment
- Agricultural Land Quality Assessment
- Drone / Topographical Survey
- Existing Buildings Assessment
- Flood Risk Appraisal
- Ground Conditions and Land Contamination Desk Report
- HRA Phase 1- Screening Assessment
- Infrastructure Technical Paper
- Landscape Character and Visual Impact Assessment
- Meecebrook Energy Utilities Strategy
- Net Zero Carbon Assessment
- Noise and Vibration Assessment
- Rail Feasibility Study (various stages)
- Rights of Way Appraisal
- Preliminary Ecological Assessment
- Socio-economic Assessment
- Sustainability Appraisal including Biodiversity Net Gain and Social Value
- Transport Strategy (various stages)
- Transport Area Impact Assessment
- Transport Issues Options and Constraints
- Utility Constraints & Capacity Analysis
- Viability Assessment on various options
- Water Resources Scheme for Meecebrook
- Wastewater Infrastructure and Non-Infrastructure Requirements

General Comments:

Q1: The question asks to select the three most important objectives for the local plan. We consider that all of the objectives outlined are important in developing proposals for Meecebrook Garden Community. The project is building all of these objectives into our approach. As set out in the Meecebrook Garden Community Vision* document published alongside this consultation, it is envisaged that the new settlement will be underpinned by the following design and delivery principles which we see as complementary to the draft objectives for the Local Plan. The Overarching Vision is set out below: and is further articulated by a 12 point Charter which forms a statement of ambition and intent that will guide the design and delivery process. 'The new settlement will be of a scale that supports self-sufficiency, with day-to-day services, community facilities, and a new main line rail station - all within easy reach for those who will live and work there. • Shaped by the green and the blue: a responsive and multi-functional landscape • Naturally supported health and well-being • A cohesive and proud community • Innovation and diversity, in homes and tenure types • Localised identity: celebrating the unique, the one-off • Walking and cycling: the natural choice • Cars will be put in their place • A growing culture of self-sufficiency • Delivery of ambition • Enterprising and economically stimulating • Reduced consumption, climate-neutral • Connected, future-looking and dynamic'. Links to further information as noted in responses to questions 1, 3 and 13 are as follows: **Q1: Meecebrook Garden**

Community Vision <https://www.staffordbc.gov.uk/meecebrook-vision> **Q3: Rail feasibility work**
<https://www.staffordbc.gov.uk/meecebrook-rail-study-feasibility-report> **Q13: Key pieces of
evidence on transport matters at Meecebrook** [https://www.staffordbc.gov.uk/meecebrook-
new-garden-settlement](https://www.staffordbc.gov.uk/meecebrook-new-garden-settlement)

From: Mike Downes [REDACTED]
Sent: 02 December 2022 11:13
To: Strategic Planning Consultations
Cc: [REDACTED]
Subject: Local Plan Consultation Response
Attachments: Preferred-Options-Consultation-Response-Form- final draft .pdf

Good Morning

Please find attached representations to the Stafford Local Plan Preferred Options Consultation on behalf of my clients Strawson Holdings Limited.

Please acknowledge receipt

Thank you

Regards

Mike Downes

[REDACTED]
[REDACTED]

Mike Downes Planning Consultant

Contact Details

Full name (required): Michael Downes

Email (required): 

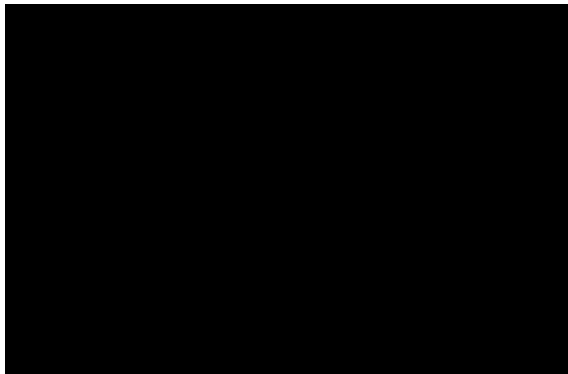
Tick the box that is relevant to you (required):

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

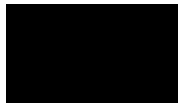
Organisation or Company Name (if applicable):

Tick the box that is relevant to you:

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



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

Policy 1 Comments:

Yes – no objection to the general amount of housing and employment land allocated. Our concern relates to the number and distribution of employment sites and whether there is a sufficient variety of sites in terms of scale and location allocated to meet demand through to 2040. This will be addressed in a response to Policy 12.

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:

Policy 3. Development in the open countryside - general principles

Yes / No

Policy 3 Comments:

No comment

Policy 4. Climate change development requirements

Yes / No

Policy 4 Comments:

No comment

Policy 5. Green Belt

Yes / No

Policy 5 Comments

No comment

Policy 6. Neighbourhood plans

Yes / No

Policy 6 Comments:

No comment

Meecebrook Garden Community

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

Do you agree with the proposed new garden community?


Yes / No

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

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

Local Plan Preferred Options document reference: Pages 41 to 45

Comments:



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.)

No – disagree - see below

Policy 12 Comments:

Policy 12

Strawson Holdings Ltd (SHL) object to Policy 12 - Other housing and employment land allocations- in that it fails to identify a sufficient variety of new sites for employment use for the plan period to 2040.

SHL consider that their landholding south of Creswell Grove at Creswell should be confirmed as an additional employment site allocation in Section B of Policy 12. The site has previously secured outline planning permission for mixed commercial, professional and community development and full permission/ Reserved Matters for access and service infrastructure, which works were subsequently commenced.

The wide-ranging mix of uses previously approved under application 17/27028/FUL are no longer considered to reflect current market demand and the residual site of 5.87ha behind the consented PFS is now promoted for more traditional Class E / B2 / B8 use.

One of the evidence-based documents informing the preparation of the emerging local plan was the Economic and Housing Development Needs Assessment (EHDNA) commissioned by The Borough Council from Lichfields Consultants. Section 8 of the EHDNA at paragraphs 8.7 and 8.8 supports the locational credentials of the Creswell Grove site for continued recognition as an employment location.

8.8 Stakeholders stressed that land provided around key junctions with the M6, particularly Junction 13 and 14 was in demand and any further land in these types of location identified for employment use would be quickly developed out. One agent commented that there is a real opportunity in Stafford for future employment land driven by the difficulty some logistics operators are having finding suitable sites in the East Midlands and therefore moving towards Stafford to identify opportunities.

This Creswell Grove site is already part serviced and ready for development.

SHL request therefore that land South of Creswell Grove is re-defined as a site allocated for employment in any subsequent Submission Version of the Local Plan

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

The policies which relate to these proposals are listed below.

Do you agree with the proposed allocations?

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

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

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

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

Policy 13. Local Green Space

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

Yes / No

Policy 13 Comments:

No comment

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

Yes / No

Policy 14 Comments:

No comment

Policy 15. Stone Countryside Enhancement Area

Yes / No

Policy 15 Comments:

No comment

Economy Policies

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

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

The relevant policies are: 16, 17 and 18.

Do you agree with these policies?

Yes

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

Policy 16

Strawson Holdings Limited (SHL) support the provisions of Policy 16 in respect of their 7.2 ha landholding south of Creswell Grove at Creswell in that its vacant yet lawful status is captured within Section D of the Policy.

Given changes in market conditions and demand factors since the original outline permission, my client will now (with the exception of the fully consented PFS frontage site) look to pursue a more 'traditional' Class E/B2/B8 uses for the main part of the site extending to some 5.87 hectares.

In responding to Policy 12 of the local plan, SHL have requested that their Creswell Grove landholding is redefined as an employment land allocation.

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

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

Do you agree with these policies?

Yes / No

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

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

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

Local Plan Preferred Options document reference: pages 65 to 71

Comments:

No comment

Housing Policies

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

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

Do you agree with this policy?

Yes / No

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

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

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

Local Plan Preferred Options document reference: pages 74 to 76

Comments:

No comment

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

Do you agree with this policy?

Yes / No

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

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

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

Local Plan Preferred Options document reference: pages 84 to 86

Comments:

No comment

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

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

Do you agree with these policies?

Yes / No

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

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

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

Local Plan Preferred Options document reference: pages 73 to 89

Comments:

No comment

Design and Infrastructure Policies

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

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

Do you agree with these policies?

Yes / No

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

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

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

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

Comments:

No comment

Environment Policies

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

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

Do you agree with these policies?

Yes / No

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

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

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

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

Comments:

No comment

Connections

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

The relevant policies are: 52 and 53

Do you agree with these policies?

Yes / No

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

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

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

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

Comments:

No comment

Evidence Base

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

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

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

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

Yes / No

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

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

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

Comments:

No comment at this stage

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

Yes / No

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

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

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

Comments:

Will await submission version of plan and assess policies against the evidence base.

General Comments

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

No further comment at this stage

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

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

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

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

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

From: Max Plotnek [REDACTED]
Sent: 12 December 2022 09:21
To: Strategic Planning
Subject: Representations to the Local Plan 2020-2040 Preferred Options document
Attachments: SBC Local Plan PO reps Dec 2022 MJP.pdf

Dear sir or madam

On behalf of Pan America Asia Group Ltd, please find attached representations in response to the Regulation 18 Stafford Borough Council (SBC) Preferred Options Local Plan.

Many thanks
Max



Max Plotnek
Founder
MJP Planning

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



Stafford Borough Council
Civic Centre
Riverside
Stafford
ST16 3AQ

9 December 2022

Sent via email only: strategicplanningconsultations@staffordbc.gov.uk

STAFFORD BOROUGH LOCAL PLAN 2020 – 2040: PREFERRED OPTIONS CONSULTATION

Dear Sir / Madam

On behalf of Pan America Asia Group Ltd, we submit the below representations in response to the Regulation 18 Stafford Borough Council (SBC) Preferred Options Local Plan issued for public consultation until 12 December 2022.

Former Staffordshire University Beaconside Campus

Pan America Asia Group Ltd owns the former Staffordshire University Beaconside Campus in East Stafford.

Staffordshire University vacated the site in 2017, when it relocated to its Stoke-on-Trent campus. Large parts of the site have lain vacant and undeveloped since.

These representations relate to two adjoining parcels of land as shown below:



Site Location Plan

Parcel 1

Parcel 1 is 9.4ha in area. It comprises the University's former residential accommodation at Stafford Court (554 rooms) and Yarlet Hall (51 rooms) and the adjacent Aston Common Room. As well, as Beaconside Sports and Fitness Centre and associated sports pitches.

Part of Parcel 1 is a draft allocation in the Preferred Options Local Plan for housing (ref: HOP03).

Parcel 2

Parcel 2 is 1.28ha in area. It is undeveloped land to the south of Weston Road and west of Hydrant Way. There is existing housing immediately to the north and south and on the opposite side of Kingston Brook to the west. Beaconside Health Centre and Stafford Fire Station are to the east of the site.

Parcel 2 is allocated in the adopted Stafford Borough Local Plan for housing (ref: Policy Stafford 4 – East of Stafford).

Sustainable redevelopment opportunity

The site (both parcels 1 and 2) can positively contribute to meeting Stafford's development needs in the short term in a sustainable location within Stafford's existing settlement boundaries.

Beaconside Sports and Fitness Centre buildings should be retained as part of any proposals, but the remainder of the site, including the sports fields, which are either vacant and / or underutilised could be more sustainably used for housing to form a natural infill to the Beaconside neighbourhood of Stafford.

Stafford town is the borough's main centre for employment and transport links and, under draft Policy 1, is identified as the priority focus for future housing growth in the borough (over 60% of new housing).

Pan America Asia Group Ltd supports the continued strategy of Stafford town as priority for growth.

Allocation HOP03 – Former Staffordshire University Campus

Pan America Asia Group Ltd supports the allocation of the Former Staffordshire University Campus for housing (Allocation HOP03), subject to the proposed amendment below.

Proposed amendment

In bringing forward Allocation HOP03, it is requested that the boundary of the allocation is amended to incorporate adjoining land also available for development and owned by Pan America Asia Group Ltd. This includes Parcel 2, which is currently allocated for housing as part of the East Stafford Sustainable Development Location (SDL) in the adopted Local Plan. The majority of the East Stafford SDL has been developed, with just Parcel 2 remaining to be delivered in line with the original Concept Diagram.

Accordingly, we have prepared an updated version of the plan showing the boundary for the proposed site allocation (see Appendix 1) and confirm that the new site area would be c.10.68ha. Based on an average net developable density of 35 dph, and net developable area of 70% it is estimated that c.260 new homes could be delivered on the site.

Paragraph 68 of the National Planning Policy Framework (NPPF) states that planning policy should identify a sufficient supply of sites, taking into account their availability, suitability and likely economic viability.

The site is in line with these requirements:

- The site is available for development.
 - The site is suitable for development, presenting a natural infill development within the settlement boundary to the east of Stafford.
 - Development would be led by a masterplan approach to ensure design is appropriate to its context and knits in with the surrounding neighbourhood.
 - The site is a viable development opportunity.
-

Accordingly, the site is deliverable in the early part of the plan period and can make a substantial contribution to meeting housing need in SBC as part of the growth strategy set out in the Local Plan.

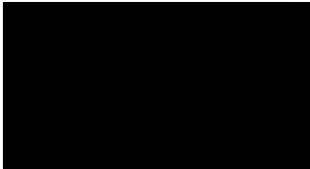
Conclusion

The former Staffordshire University Beaconside Campus provides an appropriate and sustainable location for future housing development that is viable, suitable, and available for development and thus able to contribute to meeting identified local housing need.

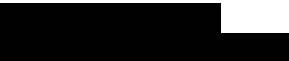
Pan America Asia Group Ltd supports the proposed allocation of the former Staffordshire University Beaconside Campus for housing, subject to amending the allocation boundary to incorporate adjoining land to fulfil the full development potential of the site, recognising land in the same ownership and to reflect the existing housing allocation that already covers part of the site in the adopted Local Plan.

We would welcome the opportunity to discuss further the full development potential of the site with SBC. In the meantime, should you have any further questions, please do not hesitate to contact me.

Yours faithfully



MAX PLOTNEK
FOUNDER



Appendix 1 Proposed boundary amendment to Allocation HOP03



From: Paul Moseley [REDACTED]
Sent: 11 December 2022 11:41
To: Strategic Planning
Subject: Site proposal concerns

To the Strategic Planning and Place Making Manager,

I wish to submit my concerns on the site selection process and ultimately the preferred sites identified in parts of Stone in the Stafford Borough Local Plan 2020-2040 Preferred Options Consultation Document.

In the first instance, I wish to comment on the site selection methodology that has unilaterally removed a potentially sustainable and suitably located Green Belt site out of the site selection process, prior to a detailed analysis purely on the grounds that it is Green Belt. Whilst Green Belt should only be released in exceptional circumstances in accordance with paragraphs 139-141 of the NPPF, it should at least be examined in the site selection process in order for the Council to assure itself it has considered 'reasonable alternatives' in the Sustainability Appraisal process, and not discounted what could be a suitable and sustainable allocation in Stone, particularly when compared to the those sites finally identified as preferred sites. Paragraph 142 of the NPPF allows for this and states that '*When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policy making authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary ... [and] where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport.*' This site would promote a sustainable pattern of development by adding to the previously allocated sustainable development, and is very well served by public transport.

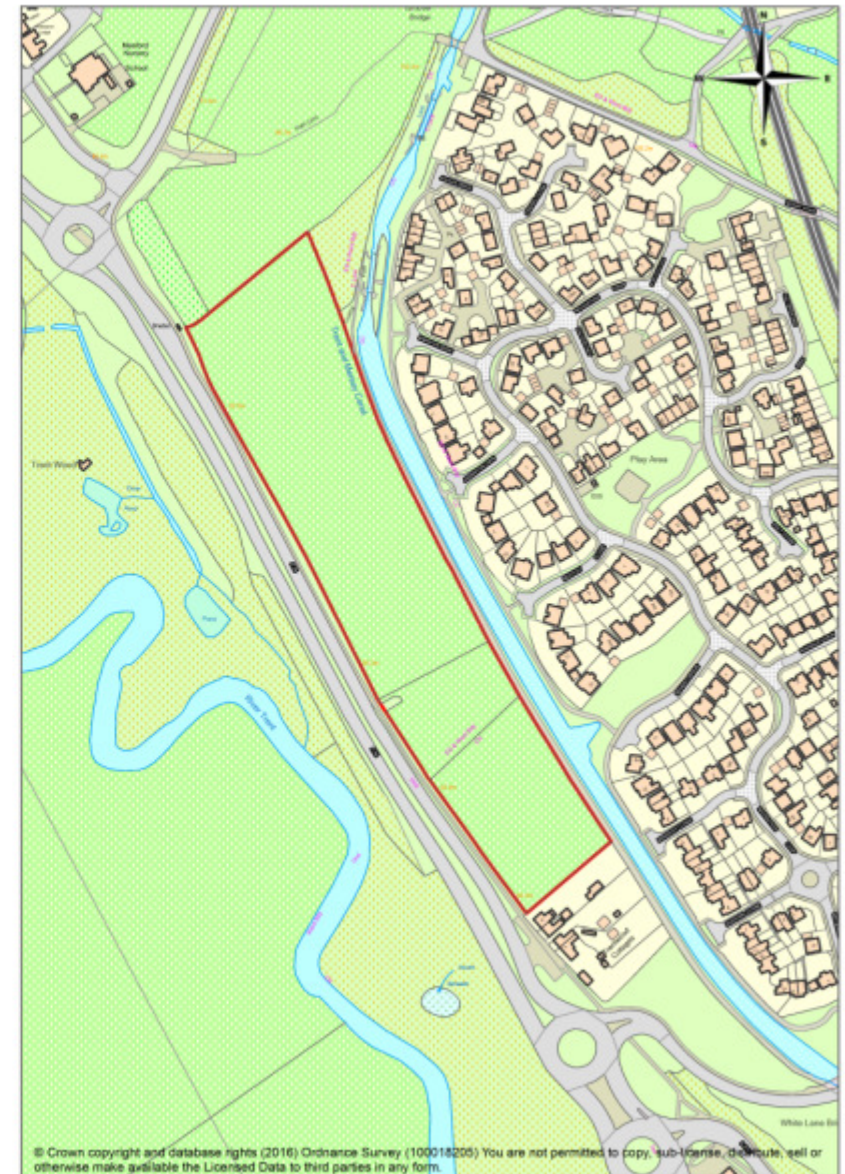
If a review of the Green Belt was carried out in accordance with the NPPF to consider this site against the 5 purposes of the Green Belt, and identify the relative level of harm from housing, I believe that it would be limited. This would be because of the site and surrounding topography, and how the proposed development would sit between the defensible boundary of the A34 to the west, and up to the canal and development on the east and south. The conclusion of the SHELAA site assessment below should be revisited to carry out a review of the Sustainable Settlement Hierarchy and Green Belt to ensure the most sustainable locations are identified for growth in the town.

Unlike the proposed allocations in the Preferred Options at ST013 and ST016 off the Uttoxeter Road, SRUR03 is in close walking distance of the train station which has good ½ hourly services to nearby urban areas, is on an active bus route on the A34, is in closer walking distance of a number of first schools, Christchurch Middle School, and the only High School at Alleyne's. It is also directly adjacent to one the towns largest employment sites at Whitebridge. It is also in walking distance of the town centre with

shops services and facilities on hand, which means that active travel measures can be implemented to reduce the reliance on using cars to access the town, and in turn having a reduced impact on the environment and the climate. Indeed, the positive attributes of this location of the town must have been recognised by the Borough Council previously in order to allocate the Whitebridge estate to the east of this site, which was previously a greenfield Green Belt development. To not assess this site's suitability because it is in Green Belt is a missed opportunity.

Stafford Borough Council SHELAA 2022

SRUR13		Site Name: Land adjacent to A34, Stone , Staffordshire, ST15 0PS	
Ward	Milwich	Parish	Stone Rural
Size	3.2 hectares	Potential Yield	78
Greenfield or Brownfield	Greenfield		
Current Use	Agricultural purposes.		
Deliverability Summary			
Available	The site is available.		
Availability Assessment	It is not known if the necessary infrastructure is considered to be available within the locality. There are no known legal or ownership issues, and the site is available immediately.		
Suitable	No; the site is adjacent to a sustainable settlement identified in the adopted Local Plan but is in the Green Belt.		
Suitability Assessment	The site is situated adjacent to the currently recognised Local Plan settlement of Stone . The following constraints are known to exist: Green Belt. A Historic Environment Record is adjacent to the site.		
Achievable	The site is achievable.		
Achievability Assessment	The site is classified as CIL typology STO2, which is considered financially viable.		
Status	Not currently developable. A review of the adopted Sustainable Settlement Hierarchy and Green Belt would be required to remove the constraint.		



Turning to the proposed allocations at STO13 and STO16: I note the comments of the Sustainability Appraisal which states:

STO13 (Land to east of Oakleigh Court; 131 homes) - is located at the southeast extent of Stone, around 2.5km from the town centre and train station. The site is subject to limited constraint in a number of respects, but notably comprises two fields separated by a historic lane and stream / hedgerow, and there is a need to consider landscape containment. However, an overriding question is regarding capacity at the nearby level crossing (on the B5027).

STO16 (Land at Uttoxeter Road; 97 homes) – is located close to STO13, and is located near-adjacent to the aforementioned level crossing. Again, the site is subject to limited constraint in a number of respects, but is notably split in two parts, specifically two fields separated by a historic hedgerow associated with a surface water flood risk channel (less significant than STO13). As per STO13, a potentially overriding question is regarding the level crossing

It is disappointing that the SA has not considered, and done a comparative review, of how the different sites around Stone can access services, facilities, employment and public transport. I would question whether 2.5km walking distance to the most southern point of the town centre is a realistic walking distance, particularly as research has shown that most people outside of London walk up to 1610m to access rail stations ([CD3.38-WYG_how-far-do-people-walk.pdf \(rapleys.com\)](https://www.rapleys.com/CD3.38-WYG_how-far-do-people-walk.pdf)). I would also question the realistic walking distances to middle and high schools which are even further north of the town centre, particularly as the research flagged above indicates most people will only walk up to a mile to access these. The catchment middle school for these sites is ordinarily Walton Priory Middle School and there is limited safe access as a pedestrian from these preferred sites due to narrow footways on the national speed limit A51 and then limited crossings on the A34. Accessing the high school from these preferred sites would likely require pedestrians to walk through the existing Aston Lodge Estate and then walk down Pingle Lane. Pingle Lane is an unadopted, unlit farm access track and is not a safe and suitable access for children walking home, particularly in the dark winter. There is limited (and at times, zero) natural surveillance and has sadly been a suicide spot over the years. At the very least, this would need reconsidering if it is the Council's contention that this is the promoted 'active travel route' for anyone on the new estate to access the town and local higher education. It does not currently meet Secured By Design Standards. The alternative route is to go on a longer route down the B5027 Uttoxeter Road. There are points on this route where the footpath is incredibly narrow or non-existent, and certainly not suitable for wheelchairs or pushchairs, and no safe crossings over this road or the level crossing. Whilst it is a 30mph road from northeast of the bowling and cricket club, the natural decreasing gradient of the road towards the Lichfield Road junction means that cars are often in excess of the speed limit. There is also no public transport access or bus route around Aston Lodge, with the nearest bus stop being in the town itself.

Cumulatively, all of the above factors will mean that new home owners will have no alternative but to use private cars to access anything local. This is contrary to paragraph 105 of the NPPF which states that '*the planning system should actively manage patterns of growth ... Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health.*' I would also question the suitability of adding additional vehicles to the level crossing, and the feasibility and practicality of upgrading the level crossing satisfactorily to mitigate the impact of these new homes. When the level crossing is under maintenance by Network Rail, which happens a number of times every year, the diversion requires car trips to go via Hilderstone and Sandon which is a significant detour and lengthy car trip as there is only one road access to this large development.

Equally, the approach is contrary to paragraph 32 of the NPPF which states that *local plans ... should be informed throughout their preparation by a **sustainability appraisal** (my emphasis) that meets the relevant legal requirements. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued.* I would contend that eliminating sites and not considering them in the Sustainability Appraisal (SRUR13) is contrary to NPPF as the alternative would eliminate such impacts.

There are also other sites in Stone (STO14 as an example) that perform better in sustainability terms, and would result in an extension to the last urban extension in Stone under the last Local Plan. This site is in close proximity to bus routes, 2 first schools, Walton Priory Middle School and a range of shops facilities and services. It has have been discounted without full sustainability assessment being carried out, and discounted due to having part of the site dissected by HS2, but also its impact on Walton Roundabout and a lack of capacity at Alleyne's High School. Taking these points in turn, there is some of the land that could be considered for housing whilst maintaining the part dissected by HS2. Secondly, I am aware from promotion material that Walton Roundabout could be significantly upgraded to accommodate additional vehicles – something which would be welcomed locally, and provide a community benefit to the existing residents. However thirdly, surely if Alleyne's has no capacity to extend the school, then no sites should be brought forward in Stone at this time, as this equally applies to the proposed allocated sites at STO13 and STO16? If it is the Council's contention that the preferred sites at STO13 and STO16 would see children attending an alternative high school further afield, then this would result in even greater trip distances to access education, contrary to the NPPF provisions above. This also undermines Stone's role as a Tier 2 settlement, as it would imply that Stone does not provide education facilities for the wider area (as the Revised Settlement Assessment and Profiles Topic Paper implies) and instead relies on other settlements to provide basic services and facilities for its residents.

As such, it is requested that a full detailed assessment of the ability of Alleyne's to accommodate additional pupils is the driving force as to whether any development in Stone can be made acceptable in planning terms. Should this be robustly demonstrated, a sustainability assessment of **all** site options (including those in the Green Belt) should be carried out, including a Green Belt Review were appropriate, to ensure that the proposed allocations are the most suitable, and sustainable for the future of our town.

I hope you will take these points into consideration and reassess the site options ahead of your Regulation 19 document.

Regards,

Mr and Mrs P Moseley

██████████
██████████

Sent from my iPhone

From: Clare Plant [REDACTED]
Sent: 09 December 2022 16:48
To: Strategic Planning Consultations
Cc: [REDACTED]
Subject: Local Plan Representation - Hallam Land Management - BER04
Attachments: Preferred-Options-Consultation-Response-Form 8.12.22.pdf; Local Plan Representation - FINAL combined (COMPRESSED).pdf

Dear Sir/Madam,

Please find attached our representations in response to the draft Stafford Local Plan, which are submitted on behalf of Hallam Land Management.

Attached to this email is:

- Completed Local Plan representation form;
- Local Plan representation report including:
 - Vision Document
 - Traffic and Transport Appraisal
 - Ecology and Biodiversity Technical Note
 - Landscape and Visual Technical Note

Should you have any queries please do not hesitate to contact me.

Many thanks
Clare

Clare Plant
Director



w: www.nineteen47.co.uk



To view our new digital brochures, please click [here](#)



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DESIGN
GROUP**

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[REDACTED] Registered in England Company Number 9875776.

Contact Details

Full name (required): Clare Plant

Email (required): [REDACTED]

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

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

Organisation or Company Name (if applicable):

Tick the box that is relevant to you:

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

[REDACTED]

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

[REDACTED]

Contents

The Local Plan Preferred Options includes the topics listed below.

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

- **Vision and Objectives** - page 5
- **Development Strategy and Climate Change Response** - page 6
- **Meecebrook Garden Community** - page 9
- **Site Allocation Policies** - page 10
- **Economy Policies** - page 14
- **Housing Policies** - page 16
- **Design and Infrastructure Policies** - page 18
- **Environment Policies** - page 19
- **Connections** - page 20
- **Evidence Base** - page 21
- **General Comments** - page 22

All of the local plan documents and the Local Plan 2020-2040: Preferred Options document are available here: <https://www.staffordbc.gov.uk/local-plan>

Vision and Objectives

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

"A prosperous and attractive borough with strong communities."

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

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

Local Plan Preferred Options document reference: Page 12

- Contribute to Stafford Borough being net zero carbon by ensuring that development mitigates and adapts to climate change and is future proof.
- To develop a high value, high skill, innovative and sustainable economy.
- To strengthen our town centres through a quality environment and flexible mix of uses.
- To deliver sustainable economic and housing growth to provide income and jobs.
- To deliver infrastructure led growth supported by accessible services and facilities.
- To provide an attractive place to live and work and support strong communities that promote health and wellbeing.
- To increase and enhance green and blue infrastructure in the borough and to enable greater access to it while improving the natural environment and biodiversity.
- To secure high-quality design.

Development Strategy and Climate Change Response

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

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

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

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

Local Plan Preferred Options document reference: Pages 19 to 40

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

Yes / **No**

Policy 1 Comments:

Draft Policy 1 at A.1. sets out the development strategy for the Borough, and states that in the period 2020 to 2040 provision will be made for 10,700 new homes (535 new homes each year).

The approach to planning for a level of housing delivery above the Local Housing Need calculation figure (based on the standard method), in order to address unmet housing need in surrounding authority areas, is generally supported in accordance with the Framework.

However, paragraph 60 sets out the Government's objective in relation to housing supply and states:

"To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay."

It is noted that the Borough's past rate of net housing delivery over the last 10 years against the Local Plan's housing requirement of 500 dpa, is more than 600dpa on average. This suggests that there could be a greater level of housing need in the Borough than envisaged in the proposed housing target.

The Stafford Economic and Housing Development Needs Assessment (2020) highlights housing needs scenarios of 647 dpa to support Cambridge Economics forecasting for job growth in a regeneration scenario, and 683 dpa to support past trend scenarios.

The Development Needs Assessment also sets out an affordable housing need of between 252 dpa and 389 dpa. This represents a significant proportion (between 47-73%) of the total housing target per annum and is within the context of an average delivery rate of 125 dpa over the last 10 years.

The NPPG suggests that further increases in housing targets may need to be considered where this could support affordable housing delivery. The draft plan sets out a range of affordable housing requirements between 0% - 40% depending on location and status of land (i.e. greenfield/brownfield). Provision will only be sought on major developments (i.e. 10+ dwellings). If we assume that 10% of housing provision will be on non-major development sites and apply an average rate of 25% provision across the remaining housing requirement, this would deliver 120 affordable dwellings per annum. Even if the average provision was increased to 40% provision across all site, which the LPA acknowledges to be unviable, the affordable provision would only be 192 dpa.

An increased figure is also support based on the data on need to accommodate those with disabilities and elderly need within the Borough as set out in the LPA's Need Assessment 2020.

Within the context of the above we **object** to the proposed housing requirement and make the following recommendations to ensure the soundness of the plan.

Recommendation – Housing Target

The Local Plan housing requirement set out in Policy 1 – A.1 should be increased to 647 dpa.

(further response to Policy 1 continued at end of form).

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

Yes / No

Policy 2 Comments:

No further comment.

Policy 3. Development in the open countryside - general principles

Yes / **No**

Policy 3 Comments:

Policy 3 sets out the categories of development that are acceptable in the countryside outside of settlement boundaries.

We **object** to the current wording of Policy 3, as drafted it provides no flexibility for the delivery of housing outside of settlement boundaries, should the plan fail to maintain a five year housing land supply, as is anticipated to be the case based on our response to Policy 1 above.

Recommendation

Policy 3 should be amended to encompass criteria for the delivery of housing on land outside of the settlement boundary in the event that the LPA cannot demonstrate a five year housing land supply.

The most robust route to addressing this issue in our opinion is through the introduction of a Safeguarding Land policy, whereby the most sustainable sites rejected through the Local Plan process are identified as safeguarded land, to be considered in the event that allocated sites fail to deliver housing supply as anticipated. Based on the evidence set out in this representation, it is considered that site reference BER04 represents a site to be allocated as safeguarded.

This will enable the housing requirement to be met in full in the plan period and will allow greater flexibility in the overall delivery of housing. As the Policy 3 is drafted, the plan cannot be considered effective and is therefore unsound. On this basis the proposed amendment is justified.

Policy 4. Climate change development requirements

Yes / No

Policy 4 Comments:

No further comment.

Policy 5. Green Belt

Yes / No

Policy 5 Comments

No further comment.

Policy 6. Neighbourhood plans

Yes / No

Policy 6 Comments:

No further comment.

Meecebrook Garden Community

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

Do you agree with the proposed new garden community?

Yes / **No**

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

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

Local Plan Preferred Options document reference: Pages 41 to 45

Comments:

Policy 7 sets out the principal land-uses and development requirements for land allocated at Cold Meece for a new settlement comprising of 3000 dwellings within the plan period. This allocation is proposed to meet 24% of the entire housing requirement in the Borough over the Plan period.

We **object** to the quantum of development proposed for the Meecebrook Garden Village within Policy 7 point B. This quantum of development is considered to be undeliverable within the plan period, for the reasons set out in paragraphs 3.18 – 3.21 of this representation.

Importantly Policy 7, Point G states that the new settlement shall be served by a new railway station on the West Coast Main Line. Part L elaborates on this and states that:

‘Development can only commence once a route to funding and delivery in line with the phasing set out in the Framework Masterplan Supplementary Planning Document has been identified for the railway station primary and secondary schools; electricity, gas, clean and wastewater and on-site renewable energy systems; and any necessary strategic highways infrastructure upgrades.’

The cross-party co-ordination and financial commitment associated with this level of infrastructure provision represents a significant challenge and risk to the sites delivery and the ability of the site to represent a new sustainable community.

As set out within the Transport Appraisal submitted at Appendix 2 of this representation, it is clear that there are a number of additional, potential highways issues including the need for major strategic highways improvements, which will create significant cost challenges to development and should be sufficiently developed to support the allocation within the Local Plan.

As stated in the Local Plan and CIL Viability Assessment (2022) forming part of the evidence base, the Garden Village is only marginally viable. The site has a low land value and therefore there is a risk landowners may not release their land for development if costs rise.

The allocation as drafted is not sufficiently developed or justified based on robust evidence and cannot therefore be considered to be sound without the following proposed amendment.

Recommendation

The Local Plan should be amended to lower the quantum of development proposed from the site during the plan period to 160 dpa in the relevant years as set out in the housing trajectory.

This amendment is justified based on evidence regarding achievable delivery rates, as set out in this representation and also to reflect potential delays associated with early infrastructure provision.

The additional 140 dpa, in addition to the quantum required to meet the uplifted housing requirement proposed in this representation can be achieved from other sustainable allocations on sites including BER04 – Land at Milford Road.

The Local Plan as drafted is overly reliant on a significant quantum of development within a single strategic site, which without associated infrastructure provision, cannot come forward to create a sustainable community. *(further response to Question 3 continued at end of form).*

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:

Land north of Stafford was previously allocated for development under the Plan for Stafford Borough (2014) and is proposed to continue to be built out under the Stafford Borough Local Plan 2020-2040, delivering a remaining allocation of 2,700 new homes.

The housing supply for Stafford is reliant on several strategic allocations including the North of Stafford allocation. Historically, strategic sites have not delivered housing at the rates anticipated in previous plans, due to their reliance on infrastructure provision. This appears to be the case with this site, which is being brought forward from the current plan due to lower delivery rates than planned for during the previous plan period.

Paragraph 9.4 of the Preferred Options document states that despite its partially developed status, there are a number of infrastructure requirements that remain critical to the delivery of the allocation. This includes highways capacity improvements, impact on Cannock Chase SAC, electricity reinforcement works and flood management.

Recommendation

The annual yield of the North Stafford site should be reduced to a maximum rate of 160 dpa, and additional housing allocations in sustainable locations should be added to the plan to ensure housing delivery in accordance with the housing requirement.

This amendment will ensure that the plan is positively prepared and justified in response to the evidence set out in the LPA's evidence paper 'Lead in and Build Out Rate Assumptions Topic Paper', which states a maximum demonstratable delivery rate of 160 dpa on major sites.

This represents a reduction in the deliverable quantum of development from the site of 228 dwellings over the plan period, assuming the lower rates stated in other years are maintained to allow for market fluctuations. Additional sustainable allocations can justifiably be identified in order to address this shortfall and to ensure the soundness of the Plan.

Policy 10. West of Stafford

Yes / **No**

Policy 10 Comments:

Land West of Stafford was allocated for development under The Plan for Stafford Borough (2014) and will continue to be built out under the Stafford Borough Local Plan 2020-2040, delivering the remaining allocation of 1,729 new homes.

As referenced above, the proposed housing supply for Stafford is largely reliant on a number of strategic allocations being brought forward including the North of Stafford allocation. This site has historically delivered a lower rate of dwellings than anticipated in the plan and this evidence should be applied to inform future housing trajectories.

Recommendation

The annual yield of the West Stafford site should be reduced to a maximum rate of 160 dpa, and additional housing allocations in sustainable locations should be added to the plan to ensure housing delivery in accordance with the housing requirement.

This amendment will ensure that the plan is positively prepared and justified in response to the evidence set out in the LPA's evidence paper 'Lead in and Build Out Rate Assumptions Topic Paper', which states a maximum demonstratable delivery rate of 160 dpa on major sites.

This represents a reduction in the deliverable quantum of development from the site of 312 dwellings over the plan period, assuming the lower rates stated in other years are maintained to allow for market fluctuations. Additional sustainable allocations can justifiably be identified in order to address this shortfall and to ensure the soundness of the Plan.

Policy 11. Stafford Station Gateway

Yes / No

Policy 11 Comments:

No further comment.

Policy 12. Other housing and employment land allocations.

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

Yes / **No**

Policy 12 Comments:

We **object** to the omission of site BER04 – Land at Milford Road from the housing allocations within from Policy 12 the draft plan.

For the reasons set out in this representation, additional housing allocations should be identified within the top tier area of Stafford to ensure the soundness of the Plan. The Plan as drafted is overly reliant on a limited number of large strategic sites, and the quantum of development from these sites is not supported by evidence of housing delivery rates on major sites either locally or nationally.

Recommendation

Policy 12 of the Local Plan should be amended to include the allocation of site BER04 – Land at Milford Road for housing development, to support the deliverability of the housing requirement on allocated sites.

This approach will ensure that the plan is justified in terms of identifying sustainable sites which are available, deliverable and appropriate in accordance with the Framework, and therefore sound.

See further technical information provided in separate representation document submitted by nineteen47 on behalf of Hallam Land Management for Land at Milford Road (site ref BER04)

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

The policies which relate to these proposals are listed below.

Do you agree with the proposed allocations?

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

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

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

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

Policy 13. Local Green Space

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

Yes / No

Policy 13 Comments:

No further comment.

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

Yes / No

Policy 14 Comments:

No further comment.

Policy 15. Stone Countryside Enhancement Area

Yes / No

Policy 15 Comments:

No further comment.

Economy Policies

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

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

The relevant policies are: 16, 17 and 18.

Do you agree with these policies?

Yes / No

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

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

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

Local Plan Preferred Options document reference: pages 61 to 65

Comments:

No further comment.

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

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

Do you agree with these policies?

Yes / No

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

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

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

Local Plan Preferred Options document reference: pages 65 to 71

Comments:

No further comment.

Housing Policies

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

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

Do you agree with this policy?

Yes / No

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

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

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

Local Plan Preferred Options document reference: pages 74 to 76

Comments:

No further comment.

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

Do you agree with this policy?

Yes / No

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

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

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

Local Plan Preferred Options document reference: pages 84 to 86

Comments:

No further comment.

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

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

Do you agree with these policies?

Yes / No

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

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

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

Local Plan Preferred Options document reference: pages 73 to 89

Comments:

No further comment.

Design and Infrastructure Policies

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

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

Do you agree with these policies?

Yes / No

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

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

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

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

Comments:

No further comment.

Environment Policies

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

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

Do you agree with these policies?

Yes / No

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

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

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

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

Comments:

No further comment.

Connections

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

The relevant policies are: 52 and 53

Do you agree with these policies?

Yes / No

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

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

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

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

Comments:

No further comment.

Evidence Base

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

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

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

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

Yes / No

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

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

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

Comments:

No further comment.

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

Yes / No

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

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

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

Comments:

The proposed delivery rates in the housing trajectory should be reduced to reflect evidence of deliverable rates achieved on other sites unless further evidence can be presented to justify the delivery rates proposed on the draft strategic sites allocations at Meecebrook Garden Village, North Stafford and West Stafford.

General Comments

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

No further comment.

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

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

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

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

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

Policy 1 Comments:

This is to reflect housing need based on job growth in a regeneration scenario.

The plan should also make clear that the proposed housing requirement is a minimum figure, which should not act as a ceiling to further development,

This approach is justified based on the LPA's growth strategy, the objective to meet unmet need from other surrounding authorities, and the level of need in relation to affordable housing and other specialist housing in the Borough.

This approach will also assist in addressing any delays experienced in the delivery of the large strategy housing sites identified within the draft plan, which are subject to significant upfront infrastructure requirements prior to being able to contribute to the housing supply.

If a further increase in the housing target, then a safeguarded land policy should be introduced. This will confirm the preferred locations for sustainable development, should the plan failed to maintain a five year supply of housing land during the relevant period. This will ensure that Policy 1 is both justified and positively prepared and therefore sound in accordance with the Framework.

Policy 1: Development strategy – Spatial Distribution of New Housing

Draft Policy 1 at point C (including the associated table) sets out the proposed distribution of housing across the Borough. A total of 59% of the housing supply is to be distributed to the Stafford urban area, reflecting its Tier 1 status within the settlement hierarchy. This equates to approximately 7,385 new market and affordable homes between 2020 - 2040.

Whilst Stafford will continue to have the highest distribution of housing overall, the percentage proposed represents a reduction compared to the previous proportion of 70%, as set out in Policy SP4 of the adopted Local Plan. This appears largely due to the proposed Meecebrook Garden Village, which represents 24% of the housing supply.

Draft Policy 1 is dependent on the Meecebrook Garden Village allocation addressing nearly a quarter of the total housing requirement within a single strategic site. Draft Policies 7 and 8 relate to this allocation and require a significant degree of up-front infrastructure to be provided prior to the delivery of this site. Although this is reflected in the housing trajectory, there is a subsequent reliance on 300 units per annum (25 dwellings per month) being delivered after 2030 in order to meet the housing requirement.

The LPA's own evidence in the Lead-in times and Build Rate Assumptions Topic Paper (Oct 2022) acknowledges the Lichfield Start to Finish report (2020), which analysed actual delivery rates on a range of sites across the country. The report found no sites for more than 2,000 dwellings had been able to consistently deliver

300 dpa, and that even in the limited instances where this figure was achieved in a single year, this represented a peak which was not replicated across the lifetime of the scheme due to economic cycles.

The mean annual rate of delivery stated within the Lichfield report on sites of 2,000+ dwellings was 160 dpa. This evidence demonstrates that Policy 1 as drafted is not justified based on evidence of achievable delivery rates and is therefore unsound.

The distribution of development within Policy 1 is also reliant on 5,438 dwellings carried over from the currently adopted Local Plan 2011 and extant planning permissions. This has the potential to result in an overreliance on extant planning commitments and historic allocations in previous iterations of the development plan, which have not historically been delivered despite being allocated for development in some cases for a prolonged period. This could be based on physical or landowner constraints, or viability challenges, which may continue to prevent delivery without specific policy remedies.

Overall, whilst we support the focus of growth on Stafford, we object to the overall distribution of housing within the settlement hierarchy as it is not justified by the evidence base.

Recommendation - Spatial Distribution of New Housing

The distribution of housing provision within Policy 1 should be amended to support the delivery of higher proportion of housing within the Tier 1 – Stafford area.

The justification for this is both to address the additional housing requirement of 112 dpa arising from the increased housing requirement recommended in paragraphs 3.11-3.15 of this representation, and also to address the lack of evidence regarding the deliverability of 24% of the Borough's housing requirement within the Meecebrook Garden Village over the plan period.

Regardless of whether an increased housing target is accepted, the spatial distribution of new housing to be set out in the plan, should be amended to reduce reliance on the Meecebrook Garden Village allocation, providing a greater proportion of allocations within the highest tier location.

The potential for achieving sustainable development through the expansion of existing settlements can be achieved through the allocation of sites including BER04 – Land at Milford Road, which has been demonstrated to be available, achievable and deliverable within the plan period.

Whilst it is acknowledged that Policy 12 allocates two additional sites, MoD Site 4 (HOP08) and Former Staffordshire University Campus (HOP03), for windfall development, outside of the housing trajectory, these do not represent reasonable fallbacks in the event that allocated sites do not come forward. This is because these

sites are acknowledged as not currently being achievable in the SHMAA, with HOP08 requiring the current user to be relocated.

The plan is unsound in its current form as it is not justified based on the evidence base and will not be effective in meeting housing need in accordance with the Framework. The site at Milford Road represents an appropriate and viable allocation, which is not constrained in physical or landownership terms.

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.

The growth potential in a number of settlements within the Stafford Area has been underplayed and allocations in these areas can be increased through a range of sites to maintain sustainable existing communities. The Milford Road site is demonstrated to be deliverable in this context and is one of the sites that should be additionally allocated to ensure the soundness of the plan.

nineteen47

CHARTERED TOWN PLANNERS
& URBAN DESIGNERS

Representation to the
Stafford Borough Local Plan 2020-2040
Preferred Options Consultation
(Regulation 19)

Land at Milford Road, Stafford (site ref: BER04)

On Behalf of
Hallam Land Management

Client:

Hallam Land Management

Project:

Milford Road, Stafford

Report Title:

Stafford Borough Local Plan Representation

nineteen47 Reference:

n2015

Date:

December 2022

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SECTION 1: INTRODUCTION

- 1.1 This Representation has been prepared by nineteen47 on behalf of Hallam Land Management (HLM) in response to Stafford Borough Local Plan 2020-2040 Preferred Options Consultation. It relates to land identified under Local Plan reference **BERO4 – Land north of Milford Road**, as shown in Figure 1 below.
- 1.2 These comments follow the extensive promotion of the site through previous consultation stages of the Local Plan. The site has also been subject to an outline planning application for residential development, as set out in Section 2 of this representation and is available, deliverable and suitable for development.

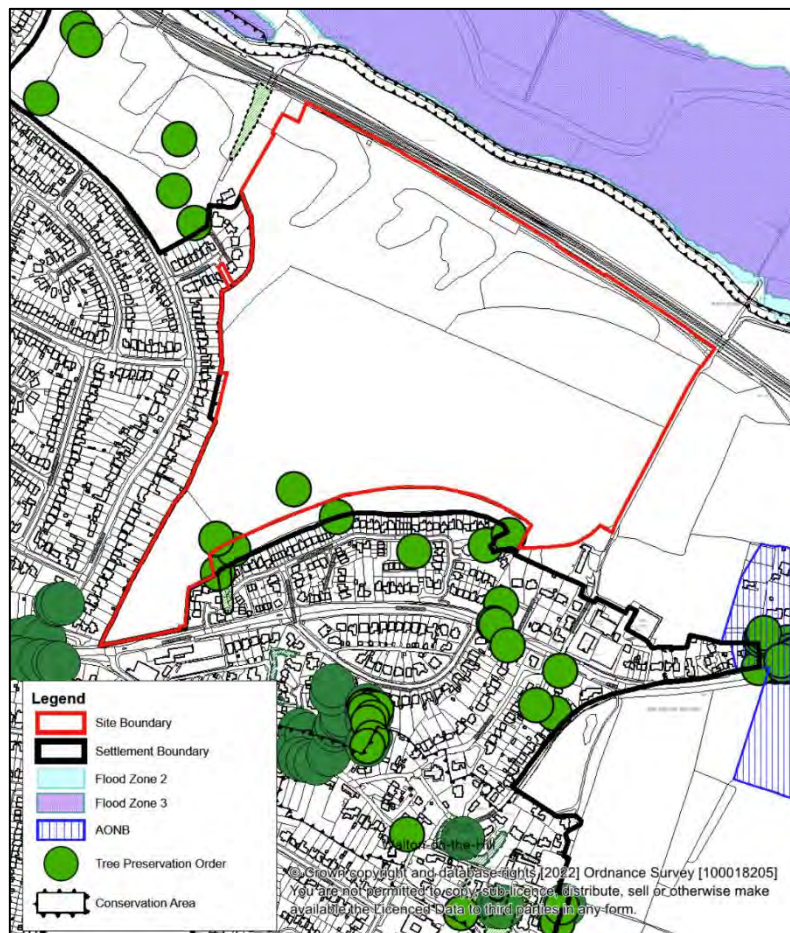


Figure 1: Extract from LPA Site Profile Forms

- 1.3 This representation is submitted on the basis that the draft Stafford Local Plan, as currently prepared, contains deficiencies that require modifications to the proposed policies to ensure the soundness of the plan. In particular, nineteen47 consider that the distribution of housing growth and the reliance of the plan on several large strategic sites renders it unsound.
- 1.4 It is our opinion that in order to achieve the proposed housing target, including the level of affordable housing required to meet identified need, it is necessary to allocate a range of sites

including unconstrained land that is attractive to the market and surrounds existing settlements, in order to support sustainable growth in the Borough.

- 1.5 The deliverability of the large strategic sites is likely to be challenging both in terms of the significant amount of upfront infrastructure required, and the associated viability challenges of delivering the sites, as reflected by the difference between brownfield and greenfield affordable housing targets.
- 1.6 The housing target must not be viewed as a ceiling above which no further development will be supported. Indeed, it would be prudent given the reliance of the plan on large strategic sites and small windfall developments in the villages, to make additional provision of housing land to ensure that the plan target can be achieved in sustainable locations.
- 1.7 In order to realise this approach, this representation raises objections to several draft policies and sets out recommendations for proposed amendments to ensure the soundness of the plan.
- 1.8 **nineteen47 strongly objects to the omission of the Milford Road site from the proposed list of housing allocations.** To ensure the soundness of the Plan, our recommendations include that the Milford Road site should be allocated for housing to ensure the delivery of sustainable development, within the appropriate locations within the plan period.
- 1.9 The following documents have also been prepared as part of this Local Plan Representation to demonstrate how the site could be developed:
 - Design Vision Document (Appendix 1)
 - Traffic and Transport Appraisal (Appendix 2)
 - Ecology and Biodiversity Technical Note (Appendix 3)
 - Landscape and Visual Note (Appendix 4)

SECTION 2: SITE ASSESSMENT – LAND AT MILFORD ROAD (BERO4)

Site Context

- 2.1 The site referred to as 'Land North of Milford Road' is included within the emerging Local Plan evidence base under site reference **BERO4** and shown in figure 2.



Figure 2: Aerial View of Site

- 2.2 The site extends to approximately 29.2 hectares in total, although only approximately 10.5ha. is proposed to be developable based on the site assessment set out in the Vision Document at Appendix 1. The inclusion of the whole site area within this representation reflects the potential to achieve associated biodiversity and landscape enhancements within the wider site as described herein and shown on the indicative masterplan.
- 2.3 The site is located immediately to the north of Walton-on-the-Hill and to the north east of Weeping Cross. It is well defined by residential areas to the south and west, Green Gore Lane to the east and the Stafford to Lichfield railway line to the north.
- 2.4 The circumstances of the site are described fully in the Vision Document provided at Appendix 1.

- 2.5 In summary, the site comprises a greenfield parcel of land formed of one large open field to the centre and south of the site and a further area of grassland and woodland to the north.
- 2.6 The site is accessed from Milford Road to the south. There is an existing Public Right of Way (PRoW) crossing the site from east to west providing pedestrian access from Walton-on-the-Hill to Weeping Cross. The site is located entirely within Flood Zone 1 on the Environment Agency's Flood Maps, which means that the site has a less than 1 in 1,000 annual probability of flooding from a river or sea.
- 2.7 There are no designated heritage assets within or immediately adjacent to the site.

Planning History

- 2.8 The site is currently outside of, although adjacent, to the Stafford settlement boundary as defined by the Local Plan 2011-2031. The site and the wider surrounding area are identified as being within the 15km Special Area of Conservation zone for Cannock Chase AONB. This area encompasses a significant degree of the Stafford plan area.
- 2.9 Following the promotion of the site through the previous local plan process, in September 2014, an outline application (ref: 14/20878/OUT) was submitted for the development of up to 225 new dwellings, a local convenience store and community parklands within the site.
- 2.10 The application was supported by a full set of supporting reports, which confirmed that there was no physical constraints to the development of the site.
- 2.11 The application was withdrawn in December 2014, shortly prior to being considered at planning committee, as the Local Planning Authority determined they could demonstrate a 5 supply of housing land and therefore the development of the application site was not required.
- 2.12 It is noted that the draft committee report raised outstanding concerns regarding the highways impact of proposals on the Weeping Cross A513/A34 junction, to the west of the site. Active discussions with third party landowners regarding mitigation measures were ongoing when the application was withdrawn. It is now considered that this issue can be resolved as addressed in the updated Transport Appraisal provided at Appendix 2.

Proposed Housing Allocation

- 2.13 In order to ensure that there is a sufficient and suitable supply of land to deliver their housing and previously developed land objectives, Local Planning Authorities are required at the local level to identify broad locations and specific sites, which will enable a continuous delivery of housing for at least 15 years. Specifically, Local Planning Authorities should identify sufficient deliverable sites for the first five years, to be considered deliverable sites, at the point of adoption of the Local Plan.
- 2.14 In accordance with the Framework glossary, for sites to be deliverable they need to be: **available** (the site is available now), **suitable** (development of the site would contribute to the creation of sustainable communities) and **achievable** (there is a reasonable prospect that housing on the site will be deliverable on the site within 5 years).

2.15 The remainder of this section will demonstrate how these criteria are supported by the Milford Road site.

Available

2.16 The site is owned by Hallam Land Management, a well-established land promoter who have a successful track record of acquiring, promoting, developing and trading in land for over 30 years. As the site is within single ownership the development of the site can be undertaken comprehensively.

2.17 The land has been previously promoted for housing development during the Issues and Options stage (February to April 2020). The site is not currently allocated in the Local Plan Preferred Options document despite being in a sustainable, tier 1 settlement location immediately adjacent to the Stafford Settlement Boundary.

2.18 As demonstrated through the previous planning application for residential development of the site (ref: 14/20878/OUT), as well as the updated supporting information contained in appendix 1-3 of this representation, there are no physical constraints that would prevent a sensitively designed residential development from being brought forward on this site.

2.19 These representations demonstrate HLM's continued commitment to bring the site forward in the short term. The site represents a sustainable and logical infill to the urban area of Stafford and is available within the plan period.

Achievable

2.20 It is considered that this site can be comprehensively developed to deliver residential development together with community uses and ecological enhancements.

2.21 The Stafford Strategic Housing and Employment Land Availability Assessment (2022), which informed the preparation of the emerging Local Plan, confirms that the site (ref: BERO4) is available, suitable for development and financially viable for development of up to 613 dwellings. This is on the basis that:

- The necessary infrastructure is considered to be available within the locality.
- There are no known legal or ownership issues and the site is available immediately.
- The site is adjacent to the currently recognised Local Plan settlement of Stafford.
- The site is classified as CIL typology STA1, which is considered financially viable.

2.22 Given the size of the site and its anticipated developable area, the actual yield anticipated is circa 370 dwellings, which reflects a density of 36 dph, as set out in the Vision Document (Appendix 1). The developable area of the site provides the opportunity to deliver both market and affordable housing, whilst the inclusion of the wider site offers significant additional benefits in the form of community facilities, open space and biodiversity enhancements.

- 2.23 There is a commitment to develop the site as soon as possible given its unconstrained nature. It is therefore considered that the site could come forward in the early stages of the plan period (0 – 5 years).

Suitability

- 2.24 It is considered that the site can be comprehensively developed to lead to the creation of a sustainable community. The development of the site in the manner shown in the Vision Document at Appendix 1 demonstrates a logical rounding off of existing settlements within Stafford, which is the top tier settlement in the Borough. As such, the development of the Representation site for residential dwellings represents sustainable development.
- 2.25 The site is well connected to Walton-on-the-Hill, which has a wide range of services and employment opportunities and strong public transport links to Lichfield and Stafford Town Centre, which mostly operate at hourly frequencies throughout the week and on weekends. The Transport Appraisal confirms that the majority of the development would be within 400m from the relocated bus stop on Milford Road or outside of Walton Village Hall. The existing Public Right of Way (PRoW) crossing the site also provides pedestrian access to Weeping Cross and can be safeguarded and enhanced as part of the development of the site.
- 2.26 The Local Plan evidence base acknowledges within the Interim Sustainability Appraisal report prepared by AECOM that site ref BERO4 is a 'Shortlisted' site. Whilst the site was not taken forward to the assessment stage, it is acknowledged that the development of the site:

'...has some merit from a perspective of containment within the landscape, and the proposal is to deliver a new shop and medical centre, which could have the effect of creating something of a new community hub between Walton-on-the-Hill and Weeping Cross / the east of Stafford, to the west. Also, the proposal is to deliver a significant area of new greenspace, which would be notably adjacent to an area of heathland priority habitat (adjacent to the railway).'

- 2.27 The Interim Sustainability Appraisal raised concerns over the landscape impact and uncertainty over the provision of a new access junction on to the A513 in relation to the site. The Site Profile Form also raises this matter but anticipates a site yield of 612 dwellings. This is significantly above the 370 dwellings now proposed. On the basis of this reduced yield, the up-to-date evidence provided within this representation, provides further assessment of landscape and highways matters to demonstrate that there are no insurmountable constraints in these respects.
- 2.28 The Interim Sustainability Appraisal Report also referenced viability concerns relating to an existing shortage of primary and secondary school provision in the area. The levels of provision and demand for school places vary over time and may change by the point that this and other sites are bought forward. Nevertheless, Staffordshire County Council, as the education provider, have accepted planning contributions for primary and secondary school provision in other recently granted permissions in this area (LPA ref 22/36536/OUT). This site can make similar contributions as required and may also be able to offer land for new primary provision, if required.

2.29 The scale and location of potential development within the Milford Road site represents a logical extension to the built-up area of Walton-on-the-Hill. This accords with the NPPF which requires the contribution towards sustainable development and the identification of site which are deliverable and developable. Specifically, the wider site is available to contribute to housing provision throughout the plan period and presents a suitable location for development.

Design

2.30 The Vision Document accompanying this representation (at Appendix 1) provides a comprehensive assessment of the Milford Road site's locational characteristics, opportunities and constraints. Within this context, a cohesive masterplan has been developed to demonstrate how the site could come forward for residential development alongside potential community facilities including extensive open space, SuDs features and significant biodiversity habitats.

2.31 Taking into account the site characteristics, the proposed yield of the site is up to 370 dwellings equating to 36 dwellings per hectare within the developable area of the site. This is a reduction in the yield envisaged in the evidence base and reflects the appropriate quantum of development of the site taking account of the physical characteristics of the site.

2.32 Within this context, the Vision Document demonstrates that there is also scope to provide community facilities, generous open space provision including ecological enhancements and in excess of 10% biodiversity net gain within the site. This will allow the development to contribute to creating a sustainable community.

2.33 In terms of the types of housing that could be delivered within the site, the Stafford Borough Council Economic and Housing Development Needs Assessment (EHDNA, 2020) recognises that, in line with national trends, the population of older people in the Borough is projected to be the fastest growing in the next 20 years, increasing by 34.9% by 2040. Within this context, the site provides the opportunity to meet the needs of older people within the housing provided on the site.

2.34 Paragraph 14.13 of the EHDNA states that the specific accommodation needs of older people fall within two different groups:

1. Those in need of communal establishment accommodation
2. Older people living in private housing, for example adaptable and accessible homes, or living in self-contained units as individual households but where some degree of care is provided (e.g. extra care or sheltered housing).

2.35 Given the approach to developable area taken within the site, there is scope to provide specialist housing to cater for an ageing population. This could include accessible and adaptable dwellings or a retirement living scheme, in line with draft Policy 24.

2.36 Affordable housing can also be integrated within the scheme to meet housing need requirements to be set out in the plan.

Highways

- 2.37 A Traffic and Transport Appraisal has been prepared and included at Appendix 2 of this representation. This provides a high-level assessment of the suitability of the site for development from a highways perspective. The Appraisal addresses the highways comments received on the previous outline application for residential development at the site (ref: 14/20878/OUT). The Appraisal also provides an assessment of the transport credentials of two other allocated sites; 'Land at Ash Flats Lane' and 'Meecebrook Garden Community', where there are concerns regarding certainty of delivery.
- 2.38 As confirmed at paragraph 2.25 of this representation, the site is in a sustainable location, in close proximity to existing local services and transport connections. The site is also well connected to the existing highway network with Milford Road (A513) being a key strategic link into Stafford from the east.
- 2.39 With regard to the previous withdrawn application for the site, and the ability of the site to mitigate the impact of development on the Weeping Cross intersection to the west, the Transport Appraisal confirms that after a review of the modelling results in accordance with the latest policy, it is considered that the Council would not be able to defend its previous position that mitigation is required at this off-site junction in accordance with overarching national policy guidance within the NPPF. Notwithstanding this, an alternative solution was previously identified, where the developer was willing to fund a shared footway/cycleway from Hillcroft Avenue to the Weeping Cross Roundabout. This would have represented a significant improvement in promoting sustainable transport modes other than the private car.
- 2.40 In terms of the scale of development, the Transport Appraisal concludes that a scheme of up to 370 dwellings could be safely accessed via a single access point without causing a marginal increase in vehicle traffic and therefore there is no reason to suggest that a scheme up to 370 dwellings could not be delivered at the site.
- 2.41 It is therefore demonstrated that the site can be safely accessed with no demonstrably harmful impact on the wider highways network and is suitable both in terms of geometry and capacity for the provision of up to approximately 370 dwellings.

Ecology & Trees

- 2.42 An Ecology and Biodiversity Technical Note (Appendix 3) has been prepared by FPCR to provide summary information relating to the biodiversity interest of the Site considering the Illustrative Masterplan prepared as part of this Representation.
- 2.43 The Site does not support any statutory designations for nature conservation interest, with the closest being Baswich Meadows Site of Special Scientific Interest (SSSI), located approximately 500m north-west of the Site and designated for unimproved semi-natural grassland habitats with transitional wetland species and is important for breeding wading birds. Furthermore, Cannock Chase Special Area of Conservation (SAC) and SSSI is located approximately 1.45km south-east of the Site.
- 2.44 The Site Profile Form within the LPA's evidence base suggests that the site has high to medium ecological sensitivity, however, within the 2014 outline application for the site,

ecological matters were satisfactorily addressed, and no protected species were found within the site. Additionally, the Habitat Regulations Assessment (HRA) submitted as part of the outline application concluded that any potential recreational pressure from the development including traffic would not result in a significant effect upon the Cannock Chase SAC.

- 2.45 The Vision Document submitted as part of this Representation, considers the assessment within the Ecology & Biodiversity Technical Note and demonstrates how extensive areas, can be incorporated within the more sensitive areas of the site for ecological/biodiversity enhancements. This may include the introduction of additional planting and potential wildlife habitats to assist in attracting and encouraging wildlife to the area (e.g. habitat piles and refugia features, bird boxes and bat boxes on retained trees or potentially within the design of buildings).
- 2.46 As illustrated in the masterplan, approximately 8.9ha of new habitat can be created, the majority of created habitats will replace existing low ecological value agricultural land with higher value woodland, grassland, and waterbodies. This proposed habitat creation will provide additional resources for a range of species and provide long term benefits to their populations.
- 2.47 In terms of biodiversity net gain, given the extent of habitat retention and habitat creation within areas of low ecological value, initial assessment indicates that the site can easily achieve a gain in access of a 10% net gain.
- 2.48 The site includes two trees that are subject to a Tree Preservation Order (TPO). These are located on the southern boundary of the site and the illustrative masterplan within the Vision Document (Appendix 1) demonstrates how these can be incorporated into the scheme. The Ecology & Biodiversity Technical Note concludes that any loss of trees can be mitigated by additional planting of individual trees, woodland, an orchard, and street trees. These features will compensate for the loss of trees due to the development and contribute towards biodiversity and provide habitat for foraging, commuting, and nesting/breeding for a range of wildlife.
- 2.49 In summary, further assessments have demonstrated that matters of ecology/biodiversity and arboriculture can be satisfactorily addressed through the appropriate development of the site.

Landscaping

- 2.50 The Site Profile Form within the LPA's evidence base suggested that the site has medium to high landscape sensitivity. A Landscaping and Visual Note has subsequently been prepared by FPCR, which demonstrates that the site can successfully accommodate built development without leading to unacceptable levels of landscape or visual harm.
- 2.51 Within this context, the Vision Document shows how well-planned development can be accommodated within this landscape. This can be achieved through the location of the modest development at the southern end of the site creating a logical extension to the existing built-up areas. The incorporation of a substantial green infrastructure to the north and east of the site creates a significant landscape buffer with enhanced habitats. This results in a sympathetic interface between the settlement edge and the local landscape.

- 2.52 Overall, the illustrative masterplan can be sensitively designed and therefore the development of the site will not result in long term landscape and visual harm.

Other material considerations

- 2.53 The 2014 outline planning application confirmed that there were no other material planning considerations that could not be addressed through an appropriately prepared development scheme. It is not considered that there have been any material changes in the physical circumstances of the site since that time, nevertheless, updated reports have been prepared in relation to highways, landscape and ecological matters and a Vision Document prepared informed by these matters to demonstrate how the site can be appropriately brought forward for development.

Conclusion

- 2.54 For the reasons set out above, the site is an available, suitable and deliverable site that should be allocated for housing in the Local Plan. The site would be a wholly logical and sustainable extension to the existing community within the tier 1 Stafford area.

SECTION 3: OBJECTIONS TO PROPOSED POLICIES

3.1 This Section considers the content and preferred policies set out within the Preferred Options document. To meet development requirements Stafford Borough Council is required by national planning policy to positively prepare an aspirational and realistic Local Plan having regard to whether the Draft Plan is sound when considered against the four tests of soundness as set out in the National Planning Policy Framework. In accordance with paragraph 35 of the Framework, plans should be:

1. **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s 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;
2. **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
3. **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
4. **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

Draft Local Plan Policies

Policy 1: Development strategy – Housing Requirement

3.2 **Draft Policy 1 at A.1.** sets out the development strategy for the Borough, and states that in the period 2020 to 2040 provision will be made for 10,700 new homes (535 new homes each year).

3.3 The approach to planning for a level of housing delivery above the Local Housing Need calculation figure (based on the standard method), in order to address unmet housing need in surrounding authority areas, is generally supported in accordance with the Framework.

3.4 However, paragraph 60 sets out the Government’s objective in relation to housing supply and states:

“To support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.”

3.5 It is noted that the Borough’s past rate of net housing delivery over the last 10 years against the Local Plan’s housing requirement of 500 dpa, is more than 600dpa on average. This suggests that there could be a greater level of housing need in the Borough than envisaged in the proposed housing target.

- 3.6 The Stafford Economic and Housing Development Needs Assessment (2020) highlights housing needs scenarios of 647 dpa to support Cambridge Economics forecasting for job growth in a regeneration scenario, and 683 dpa to support past trend scenarios.
- 3.7 The Development Needs Assessment also sets out an affordable housing need of between 252 dpa and 389 dpa. This represents a significant proportion (between 47-73%) of the total housing target per annum and is within the context of an average delivery rate of 125 dpa over the last 10 years.
- 3.8 The NPPG suggests that further increases in housing targets may need to be considered where this could support affordable housing delivery. The draft plan sets out a range of affordable housing requirements between 0% - 40% depending on location and status of land (i.e. greenfield/brownfield). Provision will only be sought on major developments (i.e. 10+ dwellings). If we assume that 10% of housing provision will be on non-major development sites and apply an average rate of 25% provision across the remaining housing requirement, this would deliver 120 affordable dwellings per annum. Even if the average provision was increased to 40% provision across all site, which the LPA acknowledges to be unviable, the affordable provision would only be 192 dpa.
- 3.9 An increased figure is also support based on the data on need to accommodate those with disabilities and elderly need within the Borough as set out in the LPA's Need Assessment 2020.
- 3.10 Within the context of the above we **object** to the proposed housing requirement and make the following recommendations to ensure the soundness of the plan.

Recommendation – Housing Target

- 3.11 **The Local Plan housing requirement set out in Policy 1 – A.1 should be increased to 647 dpa.**
- 3.12 This is to reflect housing need based on job growth in a regeneration scenario.
- 3.13 The plan should also make clear that the proposed housing requirement is a minimum figure, which should not act as a ceiling to further development,
- 3.14 This approach is justified based on the LPA's growth strategy, the objective to meet unmet need from other surrounding authorities, and the level of need in relation to affordable housing and other specialist housing in the Borough.
- 3.15 This approach will also assist in addressing an delays experienced in the delivery of the large strategy housing sites identified within the draft plan, which are subject to significant upfront infrastructure requirements prior to being able to contribute to the housing supply.
- 3.16 If a further increase in the housing target, then a safeguarded land policy should be introduced. This will confirm the preferred locations for sustainable development, should the plan failed to maintain a five year supply of housing land during the relevant period. This will ensure that Policy 1 is both justified and positively prepared and therefore sound in accordance with the Framework.

Policy 1: Development strategy – Spatial Distribution of New Housing

- 3.17 Draft Policy 1 at point C (including the associated table) sets out the proposed distribution of housing across the Borough. A total of 59% of the housing supply is to be distributed to the Stafford urban area, reflecting its Tier 1 status within the settlement hierarchy. This equates to approximately 7,385 new market and affordable homes between 2020 - 2040.
- 3.18 Whilst Stafford will continue to have the highest distribution of housing overall, the percentage proposed represents a reduction compared to the previous proportion of 70%, as set out in Policy SP4 of the adopted Local Plan. This appears largely due to the proposed Meecebrook Garden Village, which represents 24% of the housing supply.
- 3.19 Draft Policy 1 is dependent on the Meecebrook Garden Village allocation addressing nearly a quarter of the total housing requirement within a single strategic site. Draft Policies 7 and 8 relate to this allocation and require a significant degree of up-front infrastructure to be provided prior to the delivery of this site. Although this is reflected in the housing trajectory, there is a subsequent reliance on 300 units per annum (25 dwellings per month) being delivered after 2030 in order to meet the housing requirement.
- 3.20 The LPA's own evidence in the *Lead-in times and Build Rate Assumptions Topic Paper* (Oct 2022) acknowledges the Lichfield *Start to Finish* report (2020), which analysed actual delivery rates on a range of sites across the country. The report found no sites for more than 2,000 dwellings had been able to consistently deliver 300 dpa, and that even in the limited instances where this figure was achieved in a single year, this represented a peak which was not replicated across the lifetime of the scheme due to economic cycles.
- 3.21 The mean annual rate of delivery stated within the Lichfield report on sites of 2,000+ dwellings was 160 dpa. This evidence demonstrates that Policy 1 as drafted is not justified based on evidence of achievable delivery rates and is therefore unsound.
- 3.22 The distribution of development within Policy 1 is also reliant on 5,438 dwellings carried over from the currently adopted Local Plan 2011 and extant planning permissions. This has the potential to result in an overreliance on extant planning commitments and historic allocations in previous iterations of the development plan, which have not historically been delivered despite being allocated for development in some cases for a prolonged period. This could be based on physical or landowner constraints, or viability challenges, which may continue to prevent delivery without specific policy remedies.
- 3.23 Overall, whilst we support the focus of growth on Stafford, we **object** to the overall distribution of housing within the settlement hierarchy as it is not justified by the evidence base.

Recommendation - Spatial Distribution of New Housing

- 3.24 **The distribution of housing provision within Policy 1 should be amended to support the delivery of higher proportion of housing within the Tier 1 – Stafford area.**
- 3.25 The justification for this is both to address the additional housing requirement of 112 dpa arising from the increased housing requirement recommended in paragraphs 3.11-3.15 of this representation, and also to address the lack of evidence regarding the deliverability of 24% of

the Borough's housing requirement within the Meecebrook Garden Village over the plan period.

- 3.26 Regardless of whether an increased housing target is accepted, the spatial distribution of new housing to be set out in the plan, should be amended to reduce reliance on the Meecebrook Garden Village allocation, providing a greater proportion of allocations within the highest tier location.
- 3.27 The potential for achieving sustainable development through the expansion of existing settlements can be achieved through the allocation of sites including BERO4 – Land at Milford Road, which has been demonstrated to be available, achievable and deliverable within the plan period.
- 3.28 Whilst it is acknowledged that Policy 12 allocates two additional sites, MoD Site 4 (HOPO8) and Former Staffordshire University Campus (HOPO3), for windfall development, outside of the housing trajectory, these do not represent reasonable fallbacks in the event that allocated sites do not come forward. This is because these sites are acknowledged as not currently being achievable in the SHMAA, with HOPO8 requiring the current user to be relocated.
- 3.29 The plan is unsound in its current form as it is not justified based on the evidence base and will not be effective in meeting housing need in accordance with the Framework. The site at Milford Road represents an appropriate and viable allocation, which is not constrained in physical or landownership terms.

Policy 3: Development in the Open Countryside

- 3.30 Policy 3 sets out the categories of development that are acceptable in the countryside outside of settlement boundaries.
- 3.31 We **object** to the current wording of Policy 3, as drafted it provides no flexibility for the delivery of housing outside of settlement boundaries, should the plan fail to maintain a five year housing land supply, as is anticipated to be the case based on our response to Policy 1 above.

Recommendation

- 3.32 **Policy 3 should be amended to encompass criteria for the delivery of housing on land outside of the settlement boundary in the event that the LPA cannot demonstrate a five year housing land supply.**
- 3.33 The most robust route to addressing this issue in our opinion is through the introduction of a Safeguarding Land policy, whereby the most sustainable sites rejected through the Local Plan process are identified as safeguarded land, to be considered in the event that allocated sites fail to deliver housing supply as anticipated. Based on the evidence set out in this representation, it is considered that site reference BERO4 represents a site to be allocated as safeguarded.
- 3.34 This will enable the housing requirement to be met in full in the plan period and will allow greater flexibility in the overall delivery of housing. As the Policy 3 is drafted, the plan cannot be considered effective and is therefore unsound. On this basis the proposed amendment is justified.

Policy 7: Meecebrook site allocation

- 3.35 Policy 7 sets out the principal land-uses and development requirements for land allocated at Cold Meece for a new settlement comprising of 3000 dwellings within the plan period. This allocation is proposed to meet 24% of the entire housing requirement in the Borough over the Plan period.
- 3.36 We **object** to the quantum of development proposed for the Meecebrook Garden Village within Policy 7 point B. This quantum of development is considered to be undeliverable within the plan period, for the reasons set out in paragraphs 3.18 – 3.21 of this representation.
- 3.37 Importantly Policy 7, Point G states that the new settlement shall be served by a new railway station on the West Coast Main Line. Part L elaborates on this and states that:

‘Development can only commence once a route to funding and delivery in line with the phasing set out in the Framework Masterplan Supplementary Planning Document has been identified for the railway station primary and secondary schools; electricity, gas, clean and wastewater and on-site renewable energy systems; and any necessary strategic highways infrastructure upgrades.’

- 3.38 The cross-party co-ordination and financial commitment associated with this level of infrastructure provision represents a significant challenge and risk to the sites delivery and the ability of the site to represent a new sustainable community.
- 3.39 As set out within the Transport Appraisal submitted at Appendix 2 of this representation, it is clear that there are a number of additional, potential highways issues including the need for major strategic highways improvements, which will create significant cost challenges to development and should be sufficiently developed to support the allocation within the Local Plan.
- 3.40 As stated in the Local Plan and CIL Viability Assessment (2022) forming part of the evidence base, the Garden Village is only marginally viable. The site has a low land value and therefore there is a risk landowners may not release their land for development if costs rise.
- 3.41 The allocation as drafted is not sufficiently developed or justified based on robust evidence and cannot therefore be considered to be sound without the following proposed amendment.

Recommendation

- 3.42 **The Local Plan should be amended to lower the quantum of development proposed from the site during the plan period to 160 dpa in the relevant years as set out in the housing trajectory.**
- 3.43 This amendment is justified based on evidence regarding achievable delivery rates, as set out in this representation and also to reflect potential delays associated with early infrastructure provision.
- 3.44 The additional 140 dpa, in addition to the quantum required to meet the uplifted housing requirement proposed in this representation can be achieved from other sustainable allocations on sites including BERO4 – Land at Milford Road.

- 3.45 The Local Plan as drafted is overly reliant on a significant quantum of development within a single strategic site, which without associated infrastructure provision, cannot come forward to create a sustainable community.
- 3.46 The growth potential in a number of settlements within the Stafford Area has been underplayed and allocations in these areas can be increased through a range of sites to maintain sustainable existing communities. The Milford Road site is demonstrated to be deliverable in this context and is one of the sites that should be additionally allocated to ensure the soundness of the plan.

Policy 9: North of Stafford

- 3.47 Land north of Stafford was previously allocated for development under the Plan for Stafford Borough (2014) and is proposed to continue to be built out under the Stafford Borough Local Plan 2020-2040, delivering a remaining allocation of 2,700 new homes.
- 3.48 The housing supply for Stafford is reliant on several strategic allocations including the North of Stafford allocation. Historically, strategic sites have not delivered housing at the rates anticipated in previous plans, due to their reliance on infrastructure provision. This appears to be the case with this site, which is being brought forward from the current plan due to lower delivery rates than planned for during the previous plan period.
- 3.49 Paragraph 9.4 of the Preferred Options document states that despite its partially developed status, there are a number of infrastructure requirements that remain critical to the delivery of the allocation. This includes highways capacity improvements, impact on Cannock Chase SAC, electricity reinforcement works and flood management.

Recommendation

- 3.50 **The annual yield of the North Stafford site should be reduced to a maximum rate of 160 dpa, and additional housing allocations in sustainable locations should be added to the plan to ensure housing delivery in accordance with the housing requirement.**
- 3.51 This amendment will ensure that the plan is positively prepared and justified in response to the evidence set out in the LPA's evidence paper 'Lead in and Build Out Rate Assumptions Topic Paper', which states a maximum demonstrable delivery rate of 160 dpa on major sites.
- 3.52 This represents a reduction in the deliverable quantum of development from the site of 228 dwellings over the plan period, assuming the lower rates stated in other years are maintained to allow for market fluctuations. Additional sustainable allocations can justifiably be identified in order to address this shortfall and to ensure the soundness of the Plan.

Policy 10: West of Stafford

- 3.53 Land West of Stafford was allocated for development under The Plan for Stafford Borough (2014) and will continue to be built out under the Stafford Borough Local Plan 2020-2040, delivering the remaining allocation of 1,729 new homes.

3.54 As referenced above, the proposed housing supply for Stafford is largely reliant on a number of strategic allocations being brought forward including the North of Stafford allocation. This site has historically delivered a lower rate of dwellings than anticipated in the plan and this evidence should be applied to inform future housing trajectories.

Recommendation

3.55 **The annual yield of the West Stafford site should be reduced to a maximum rate of 160 dpa, and additional housing allocations in sustainable locations should be added to the plan to ensure housing delivery in accordance with the housing requirement.**

3.56 This amendment will ensure that the plan is positively prepared and justified in response to the evidence set out in the LPA's evidence paper 'Lead in and Build Out Rate Assumptions Topic Paper', which states a maximum demonstratable delivery rate of 160 dpa on major sites.

3.57 This represents a reduction in the deliverable quantum of development from the site of 312 dwellings over the plan period, assuming the lower rates stated in other years are maintained to allow for market fluctuations. Additional sustainable allocations can justifiably be identified in order to address this shortfall and to ensure the soundness of the Plan.

Policy 12: Other Housing and Employment Land Allocations

3.58 We **object** to the omission of site BERO4 – Land at Milford Road from the housing allocations within from Policy 12 the draft plan.

3.59 For the reasons set out in this representation, additional housing allocations should be identified within the top tier area of Stafford to ensure the soundness of the Plan. The Plan as drafted is overly reliant on a limited number of large strategic sites, and the quantum of development from these sites is not supported by evidence of housing delivery rates on major sites either locally or nationally.

Recommendation

3.60 **Policy 12 of the Local Plan should be amended to include the allocation of site BERO4 – Land at Milford Road for housing development, to support the deliverability of the housing requirement on allocated sites.**

3.61 This approach will ensure that the plan is justified in terms of identifying sustainable sites which are available, deliverable and appropriate in accordance with the Framework, and therefore sound.

SECTION 4: CONCLUSION

- 4.1 This Local Plan Representation has been prepared by nineteen47 on behalf of Hallam Land Management in response to Stafford Borough Local Plan 2020-2040 Preferred Options Consultation.
- 4.2 nineteen47 strongly objects to the omission of site BERO4 – Land at Milford Road from the Stafford settlement development limit and for the reasons set out in this representation recommend that:

BERO4 – Land at Milford Road be allocated for Housing, in order to contribute to the overall supply of such land in the Borough and to ensure the adequate provision of market and affordable housing and other associated benefits over the plan period.

- 4.3 Section 2 of this representation confirms the landowner’s commitment to delivering the housing within the site, and provides detailed evidence including Appendices 1-4, to demonstrate the suitable, achievable, and deliverable nature of the site as a location to accommodate further sustainable housing growth.
- 4.4 The site can be delivered in the short term, is within a sustainable location and can make a viable contribution to the vitality and sustainability of the nearby areas, in accordance with the aspirations of the Framework.
- 4.5 There are a wide range of benefits associated with the comprehensive development of the site, based on an appropriate provision of up to approximately 370 dwellings and a significant associated area of undeveloped land available to achieve community benefits including POS and biodiversity enhancements.
- 4.6 Section 3 of this representation analyses the spatial strategy set out within the draft Local plan, to demonstrate that the overall housing requirement should be increased and distributed in a robust manner, to ensure that the economic growth objectives of the plan are fully supported, as well as meeting the full range of local housing need.
- 4.7 The draft policies 1, 3, 7, 9, 10, 12 should be amended as set out in section 3 of this representation to ensure that the Plan is positively prepared, justified, and effective and therefore sound in accordance with the Framework.

APPENDIX 1 – VISION DOCUMENT



Proposed Residential Development on Land North of
MILFORD ROAD, WALTON ON THE HILL, STAFFORD

VISION DOCUMENT

December 2022

nineteen47
CHARTERED TOWN PLANNERS
& URBAN DESIGNERS



**Hallam Land
Management**



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- 5 The Emerging Concept Layout.....20
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nineteen47
CHARTERED TOWN PLANNERS
& URBAN DESIGNERS



1

INTRODUCTION

This Vision Document has been prepared by Hallam Land Management, who control land to the north of Milford Road in Walton-on-the-Hill, with the aim of promoting it as a suitable, available, flexible and deliverable location for housing, complementary local facilities and/or community uses, newly accessible areas of open space and a large area that could potentially be set aside to deliver biodiversity enhancements.

Hallam Land Management

Hallam Land Management has been acquiring, promoting, developing and trading in land since 1990. During that time we have established an outstanding record in resolving complex planning and associated technical problems in order to secure planning permissions for a whole range of different land uses.

With our head office in Sheffield and five regional offices we operate nationally, working with landowners, local authorities, communities and other stakeholders to bring forward new development opportunities. We currently have interests in over 14,000 acres of land on more than 180 sites through ownership, option or planning promotion agreements.

Promoting the use of land for housing has been Hallam's largest area of work and we have obtained many planning permissions for residential development in all our operating areas. Promoting sustainable developments within the new planning framework and contributing to the social and economic growth of communities will be a fundamental objective for Hallam in the coming years.

Eccleshall Road, Stone

Hallam Land Management promoted this 72 acre site within Stafford through the current Local Plan, in which the site was allocated for residential development. Outline planning consent was subsequently obtained by Hallam Land Management for 500 dwellings and extension of the existing school. The site was subsequently sold to Persimmon and Anwyll Homes in 2018 and is now nearing completion.



Purpose of this Document

This Vision Document brings together the initial technical and environmental studies of the land and its context which have been undertaken by Hallam Land Management and their Consultant Team and presents high-level summaries of the initial findings which have been used to inform the emerging Illustrative Masterplan.

Details of the potential capacity for housing here are presented in the document, but at this stage we believe that there is capacity for a total of approximately 375 market and affordable homes, potentially including an element of elderly care/retirement living and also providing opportunities for complementary local facilities and/or community uses.

The Illustrative Masterplan presented in this document has been prepared to respond to the outcomes of the initial assessment work and demonstrates the site's availability and suitability for development, together with its sustainable credentials. It shows how a high quality and sympathetic scheme could be brought forward with strong place-making principles, a logical and achievable access and movement strategy, and an intent to define a meaningful green-blue infrastructure strategy. The work presented represents our initial thinking, shows the potential capacity and is intended to provide the basis for discussions with Stafford Borough Council and other interested stakeholders.

Document Structure

The Vision Document is structured as follows:

Section 2: Site and Surrounding Context

Includes a description of the site and a brief overview of the local area.

Section 3: Planning Context & History

Presents an assessment of the relevant planning guidance and why allocation of this site for development would form part of an appropriate strategy, sequentially preferable to other sites in the area. Also presented is a brief planning history of the site.

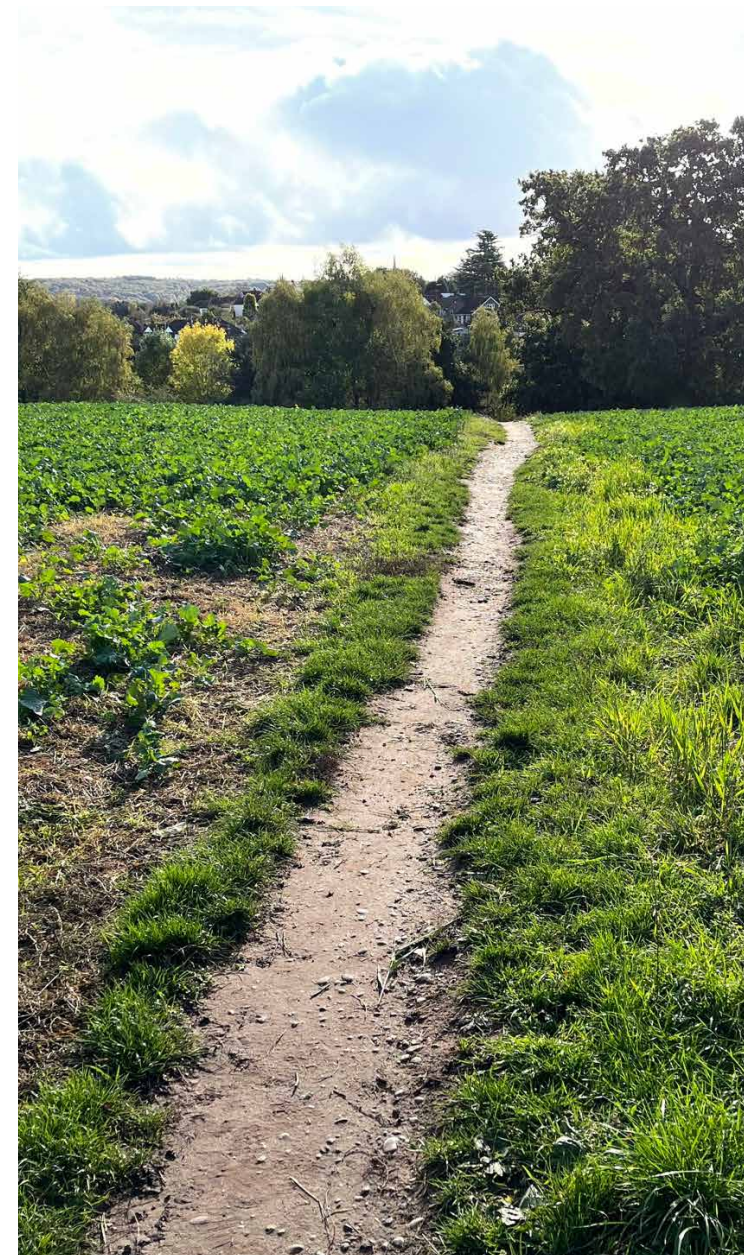
Section 4: Environmental and Technical Considerations

Provides an overview of surveys and assessments which have been undertaken to provide a summary of the known constraints and opportunities that the site presents.

Section 5: The Emerging Illustrative Masterplan

Explains the emerging illustrative proposals and how they respond to the known planning, environmental and technical considerations.

Section 6: Conclusions Summarises the positive case for residential-led development on the identified land.



2

THE SITE
AND THE
SURROUNDING
CONTEXT

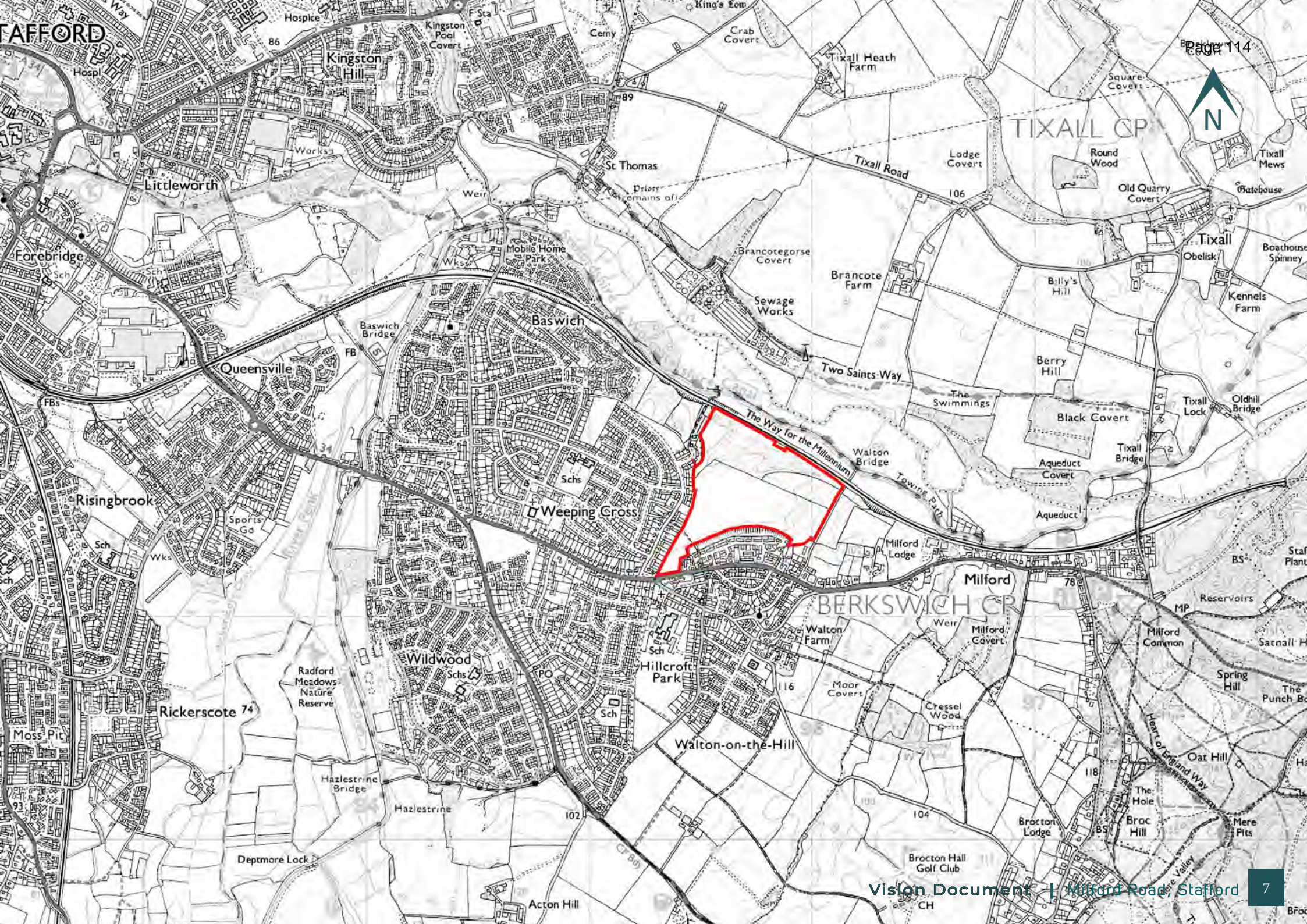
Hallam Land Management's interest (referred to as "the site") consists of land to the north of Milford Road, in Walton-on-the-Hill, which is to the south east of the main urban area of Stafford. The site extends to approximately 29ha (71.5 acres) and currently comprises agricultural land, scrub and woodland.

At its south-western end, the site rises northward to reach a relatively flat area in the western/central part of the site before descending steeply northwards towards the railway line and eastwards towards Green Gore Lane.

The site is bound by residential development to the south, east and west. Milford Road is to the south and a railway line forms the northern boundary, beyond which is the Staffordshire and Worcestershire Canal and also the River Sow. Green Gore Lane is to the east and is unadopted.

Milford Road is a strategic link towards Stafford in the west. The centre of Walton-on-the-Hill can be accessed from the site on foot via an existing crossing on Milford Lane. There is an existing Public Right of Way (PRoW) footpath crossing the site from east to west which provides pedestrian access to Weeping Cross in the west.





3

PLANNING CONTEXT AND HISTORY

Planning History of the Site

The site has been consistently promoted for development throughout the Local Plan process by Hallam Land Management. Although the site was not allocated for development, an outline application was submitted in September 2014 for the development of up to 225 new dwellings, a local convenience store and community parklands within the site. The application was submitted and subsequently withdrawn in December 2014 on the basis that, at the time, the Council could demonstrate a 5 supply of housing land. The need for additional off-site highways mitigation measures was also referenced, but as is explained later in this document, there were constructive discussions on-going at the time that would have satisfactorily resolved this.



Previous Masterplan

Planning Context

As part of the Stafford Borough Local Plan 2020-2040 Preferred Options document, the site remains unallocated and outside albeit adjacent to the settlement boundary. Walton-on-the-Hill forms part of the Stafford Urban Area within the draft Local Plan.

As acknowledged by the Preferred Options Plan, Stafford is the largest town in the District and is a sustainable location for growth. It has a wide range of services, shops and employment opportunities with good public transport links.

Draft Policy 1 sets out the development strategy for the Borough, which states that in the period 2020 to 2040 provision will be made for 10,700 new homes (535 new homes each year). A total of 59% of the housing supply is to be distributed to Stafford urban area within the spatial strategy, reflecting the settlement hierarchy. This equates to approximately 7,385 new market and affordable homes between 2020 - 2040.

The majority of this housing target will be met through a number of strategic development sites including:

- North of Stafford (SDL - North of Stafford) strategic development – Policy 9
- West of Stafford (SDL - West of Stafford) strategic development – Policy 10
- Stafford Station Gateway allocation – Policy 11

The Stafford Strategic Housing and Employment Land Availability Assessment (2022), which informed the preparation of the emerging Local Plan, identifies the site under reference BERO4 – Land at Milford Road, ST17 0JP. The SHELAA confirms that the site is available, suitable for development, is adjacent to the existing settlement, is potentially financially viable for development of up to 613 dwellings.

As is demonstrated throughout this document, the site represents a logical extension to the settlement and offers the opportunity for additional choice within the housing supply. It is considered that the site can be utilised in a sustainable manner to provide a residential-led development for Stafford.

This Vision Document provides further details of the opportunities for development within the site and confirms the anticipated yield based on consideration of site constraints and taking into account the relevant existing and emerging planning policies.

Stafford Borough Council SHELAA 2022

BERO4		Site Name: Land north of Milford Road, ST17 0JP	
Ward	Milford	Parish	Berkswich
Size	29.2 hectares	Potential Yield	613
Greenfield or Brownfield	Greenfield		
Current Use	Agricultural land, scrub and woodland.		
Deliverability Summary			
Available	The site is available.		
Availability Assessment	The necessary infrastructure is considered to be available within the locality, but the provision of infrastructure to the site will need to be confirmed with the relevant utility companies. There are no known legal or ownership issues and the site is available immediately.		
Suitable	The site is adjacent to a currently recognised Local Plan settlement.		
Suitability Assessment	The site is adjacent to the currently recognised Local Plan settlement of Stafford. The following constraints exist: Historic Environment Record, Tree preservation order, a Public Right of Way, landfill buffer and mineral deposits buffer.		
Achievable	The site is achievable.		
Achievability Assessment	The site is classified as CIL typology STA1, which is considered financially viable.		
Status	The site is potentially developable based on the compliance with Policy C5 of the Local Plan and Paragraph 72 of the NPPF.		



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4

ENVIRONMENTAL
AND TECHNICAL
CONSIDERATIONS

Highways & Accessibility

Local Highway Network

The site is located on the south-eastern side of Stafford and off the A513 Stafford to Rugeley Road. Stafford town centre is 4km to the west and Rugeley town centre is 11km to the east. The A513 joins with the A34 Cannock Road approximately 900m to the west and becomes a major arterial route into the town.

The previously submitted planning application from 2013 was supported by a full suite of documents including a Transport Assessment (TA) and a Framework Residential Travel Plan. The proposals put forward at that time were based upon a very similar junction arrangement along Milford Road as is likely to be promoted in the future. Consultee comments received from Staffordshire County Council (SCC) at that time confirm that they offered their support of the development subject to five conditions related to traffic monitoring, local bus stop enhancement and other off-site improvements.



View west along Milford Road from location of proposed access to the site



View east along Milford Road (A513) bordering the southern boundary of the site

Public Transport

The site is served by four bus routes operating from nearby bus stops on Milford Road and Widcombe Avenue. Services provide connections to Rugeley and Lichfield, as well as to Stafford Town Centre and Stafford railway station.

Stafford railway station is located at the junction of the Trent Valley Line and the Rugby-Birmingham-Stafford Line, and an important main line interchange on the West Coast Main Line. As well as local routes, it also offers access to services to Birmingham New Street, London Euston, Bournemouth, Bristol, Liverpool and Manchester.



Bus stop along Milford Road

Pedestrians & Cyclists

The A513 Milford Road has lit footways of good quality and safe crossing points exist in the form of a pelican crossing at the junction with The Crescent and a toucan crossing near to the junction with The Rise. There is also a pedestrian refuge with appropriate tactile paving located near to the junction with The Rise.

There is an existing Public Right of Way (PRoW) footpath that crosses the site from east to west and provides pedestrian access to Weeping Cross in the west.

There are a number of cycle routes in proximity to the site. The Rise forms part of an advisory cycle route towards Brocton and Cannock Chase, whilst Bodmin Avenue to the west of the site forms part of National Cycle Network (NCN) Route 5, which provides cycle access to Stafford Town Centre. The close proximity of this National Cycle Route not only provides residents with the option to commute into Stafford Town Centre, but also provides recreational and leisure opportunities.



Public right of way across the site looking to the north west view of St Anne's Roman Catholic Church



Toucan Crossing on Milford Road to The Rise

Services and Facilities

The site falls with the parish of Berkswich, and is at the edges of the wards of Baswich and Weeping Cross. Walton-on-the-Hill is to the south and is a much-expanded village but has no shops. Baswich is a mid-20th century housing estate and includes a local centre with schools, shops and a health centre.

Both Leasowes Primary School and St Annes Catholic Primary School are to the west of the site, in Weeping Cross, approximately 700m from the site. Walton High School is approximately 250m from the southern end of the site, across Milford Road.

Supporting transport assessment work has identified that there are a good number of local facilities accessible within a walking/ cycling time of 20 minutes of the site and/or by public transport and it is considered that the availability of these local facilities and their accessibility would aid social inclusion and reduce reliance on the private car for local journeys.



Facilities Plan



Walton Village Hall



Co-op at Weeping Cross



Walton High School

Landscape and Visual Assessment

The site's landscape character is influenced by the urbanising elements of the surrounding built edge to the west and south. The main part of the site – that is more likely to contain built development – is a rather ordinary featureless arable field devoid of any significant vegetation or landscape features. Aside from two oak trees that are covered by a Tree Preservation Order, and which can be suitably retained, landscape features are restricted to blocks of woodland and hedgerows on the site's sloping fields to the north and east. These features (and the site's valley slopes) can all be retained.

The site is not designated for any landscape quality designation at either a national or local level. Although the site lies close to the Cannock Chase AONB the site does not display any distinctive landscape characteristics of that landscape. The vast majority of the site is not publicly accessible.

Walton-on-the-Hill Conservation Area lies to the south with the intervening built up area of screening views of the site. There are localised close-range views from the adjacent residential edge and from the short stretch of a Public Footpath that crosses the site. Opportunities for views of the site from the elevated hills of Cannock Chase to the east are limited in extent. Where there are views, these are distant with the site forming a minor component of wider view observed within the context of the built-up area of Stafford (Walton-on-the-Hill and Weeping Cross). To the south-east there are occasional views of the spire of St Thomas in Walton on the Hill.

It is considered that the site can successfully accommodate built development in the form of new housing without leading to any unacceptable landscape and visual harm. It is located alongside the existing built-up area to the west and south such that new development would form a logical extension.



View of St Thomas's spire from within the site



One of the two Oak trees covered by a Tree Preservation Order



View north along Green Gore Lane

Arboriculture

The site includes two trees that are covered by a Tree Preservation Order (TPO). There are also three trees within close proximity to the boundary of the site. The two trees are located within the site and three trees are located outside of the site to the south and adjacent to the boundary.

Other tree cover is generally located around the boundaries of the site, with a recently planted woodland strip present adjacent to the south-eastern boundary.



View along the public right of way



View along the public right of way opening onto Bluebell Hollow



View of existing tree on the west boundary



View south of recently planted woodland strip to the south-eastern boundary

Ecology

There are no nature conservation sites that directly affect the site. Cannock Chase Special Area of Conservation (SAC) is about 1.4km away.

Habitats within the site comprise mostly arable land with small areas of semi-improved grassland, plantation woodland, scrub and ruderal vegetation. Native hedgerows, domestic ornamental hedgerows and fences divide and border the site. Mature, native trees are scattered within the arable land although these habitats are no more than parish level importance.

The likely fauna including reptiles, invertebrates and badgers are likely to be also of parish-level importance and limited to the northern edges of the site. This part of the site has an interesting mosaic of habitats and could support species such as grass snakes.



Habitat Plan



View looking along the eastern boundary looking toward the northern edge of the site



View south of existing trees and hedgerow along the eastern boundary

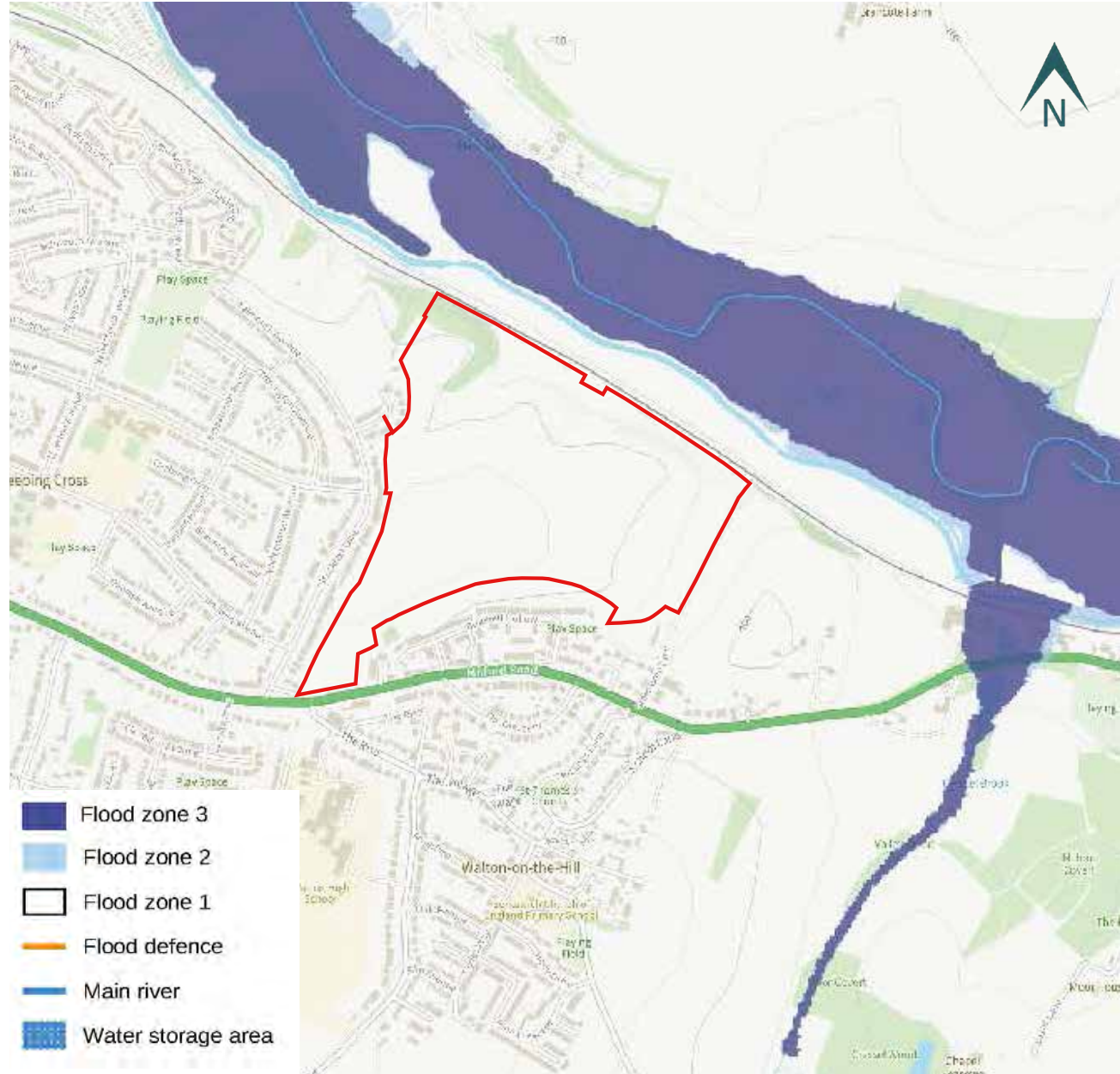
Flood Risk Assessment

The Environment Agency Flood Zone mapping shows the site to be located entirely within Flood Zone 1 (low probability). This zone is defined in the NPPF as land assessed as having a less than 1 in 1,000 annual probability of river or sea flooding.

The River Sow is situated north of the site, beyond both the railway line and the Worcestershire Canal. The floodplain extents of this river do not exceed beyond the canal on the northern boundary of the site and the topography of the local area is such that the site is well elevated above this source of risk. Flood risk from the canal is also considered to be low.



View north from plateau within the site toward the railway line and River Sow beyond



Flood plan

Heritage

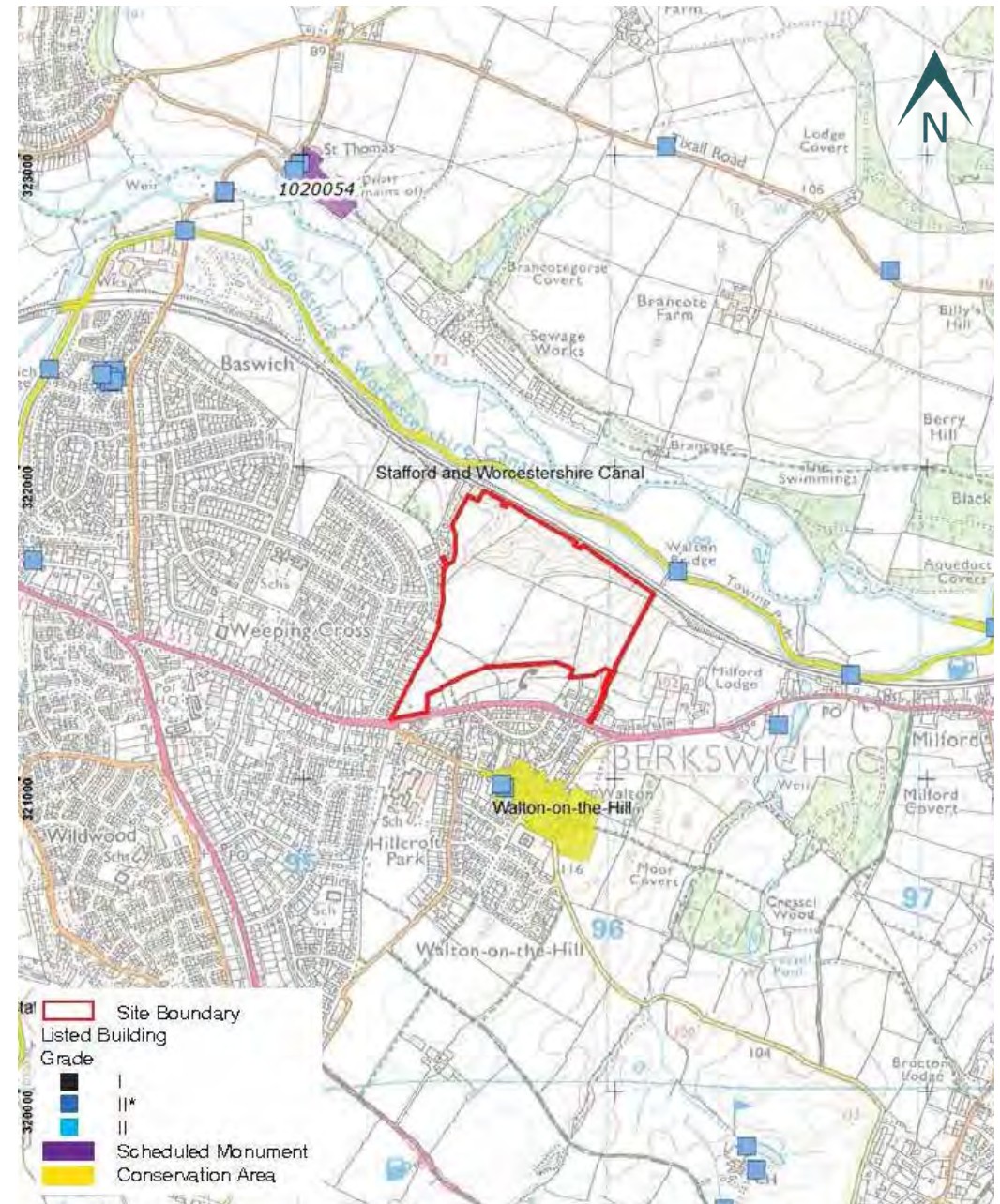
There are no Designated Heritage Assets (Listed Buildings, Scheduled Monuments or Conservation Areas) within the site. Some of the nearest features of historic interest are:

- Walton Bridge, a Grade II Listed Building, about 100m north of the site.
- The Staffordshire and Worcestershire Canal Conservation Area boundary, about 100m north of the site.
- The Walton-on-the-Hill Conservation Area, 250m southeast of the site (as mentioned earlier).
- St Thomas' Priory, a scheduled monument, about 1km north west of the site.

On the site, there are two historic features. A Medieval/Post-Medieval woodland boundary earthwork bank was partially destroyed during construction of the railway line. Stockton Farm, an 18th century farmstead was demolished in the 20th century. Any archaeological remains that survive within the site are likely to be of no more than low importance.



Walton Bridge



Local Character

A more detailed study of local character would be undertaken as an application is prepared to gain an understanding of the smaller details that provide local character. The surrounding adjacent developed areas however, do not appear to have many shared features that could be considered to be specifically “of the place” and are largely of their time. Streets locally often include trees and hedges or low walls to define primary frontages. Building materials used locally appear to include a darker red brick that is sometimes combined with a Staffordshire blue brick as a feature. There is some variety in roofscape, with the use locally of grey and red roof tiles of varying profiles.



View along Bluebell Hollow



Meadow Sweet Drive



Milford Road, dwelling that look north onto the site



Dwelling at the junction of Milford Road and Meadow Sweet Drive



New development at Apple Tree Close



5

THE EMERGING
ILLUSTRATIVE
LAYOUT

The Design Concept

An emerging vision for a new residential area in this sustainable location has been conceived on the basis of;

- Market and affordable housing, catering for a variety of household sizes and tenures;
- The potential for complementary uses such as elderly care/retirement living and local facilities and/or community uses;
- The use of unconstrained land for the formation of development areas and associated formal open space, with more topographically challenging land used for informal open space and biodiversity enhancement;
- A sensitive approach to site boundary conditions and to existing trees and hedgerows;
- Formation of a safe and legible movement network that prioritises pedestrians and cyclists over car users and retains the existing PRoW that crosses the site;
- The potential for views from within the site toward the spire of St Thomas' Church in Walton on the Hill

These elements are the basis upon which an Illustrative Masterplan has been produced, demonstrating how it could be possible to realise the vision. Hallam Land Management would welcome the opportunity to engage with Staffordshire Borough Council such that a scheme could evolve which considers the views of all interested parties.







Emerging Illustrative Masterplan





Use and Amount Plan

-  Open Space
-  Residential

Use & Amount

Residential Uses within the Development Zone

A development zone is defined by the Illustrative Masterplan that utilises land within the site that is unconstrained by existing topography or other known constraints, which extends to approximately 10.5ha (26 acres). At a density of 36 dwellings per hectare, there is therefore a theoretical capacity for circa 375 dwellings. It is anticipated at this stage that both market and affordable homes would be provided as part of a mix of household sizes ranging from one to four or five bedrooms. Within the development zone extent identified for residential use, there is the potential that land could be used for an elderly care/retirement living facility should the local need exist.



Other Uses within the Development Zone

A zone has also been identified at the front of the site that could be removed from the residential provision to provide complementary local facilities and/or community uses. The precise nature of this use is something that could be explored as proposals emerge, but potentially suitable uses that could be accommodated include (but are not restricted to) a doctors or dental surgery, a community centre or village hall, a nursery and/or a local shop.



Non-developed Areas

A significant proportion of the site - approximately 60% - is defined by the Illustrative Masterplan for use as open space. The vision for a green-blue infrastructure strategy is set out later in this section of the document and is inclusive of multiple uses including children's play, a sustainable drainage system and bio-diversity enhancements.

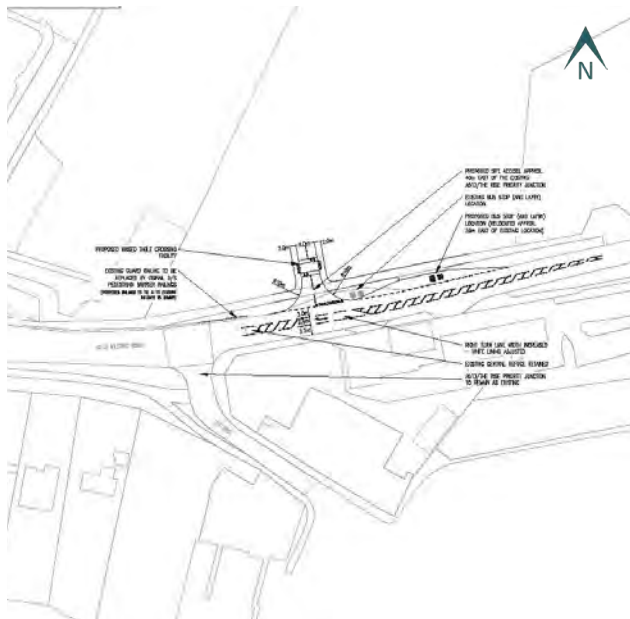


Access & Movement

It is proposed that the development will be accessed from the surrounding highway network via the A513 Milford Road. At this stage, it is anticipated that a new priority junction would be created, which includes a dedicated right turn bay. The form of this junction reflects historic discussions undertaken with Staffordshire County Council and recommendations included in an independent Stage 1 Road Safety Audit (RSA) at the time of the previous outline planning application. The new junction would retain existing pedestrian crossing facilities that link the site to the nearby school.



Given that a single point of vehicular access is likely for development of the site, early masterplanning work has sought to define a layout solution that includes an internal highway loop that provides route choice within the site as early as is possible. Several options have also been considered for the stretch of internal street that links the new access with the internal highway loop, such that movement could be maintained in the event of a blockage occurring. The precise detail of this could evolve in collaboration with Staffordshire County Council to achieve a safe and attractive solution, for which the emerging Illustrative Masterplan reserves space. Should there be a desire for it, capacity could also be created within the carriageway of the primary streets to facilitate a bus service within the site.



View of proposed access location on Milford Road on the south west boundary

Detailed access plans

A street hierarchy is defined by the Illustrative Masterplan, using street trees, varied corridor widths and changes in material to create the basis for a legible movement framework. Crossing points are shown as strategic speed-reducing features within the development area that would ensure pedestrian and cyclist priority over motorised traffic and that vehicle speeds could be restricted within the development to achieve a 20mph design speed.

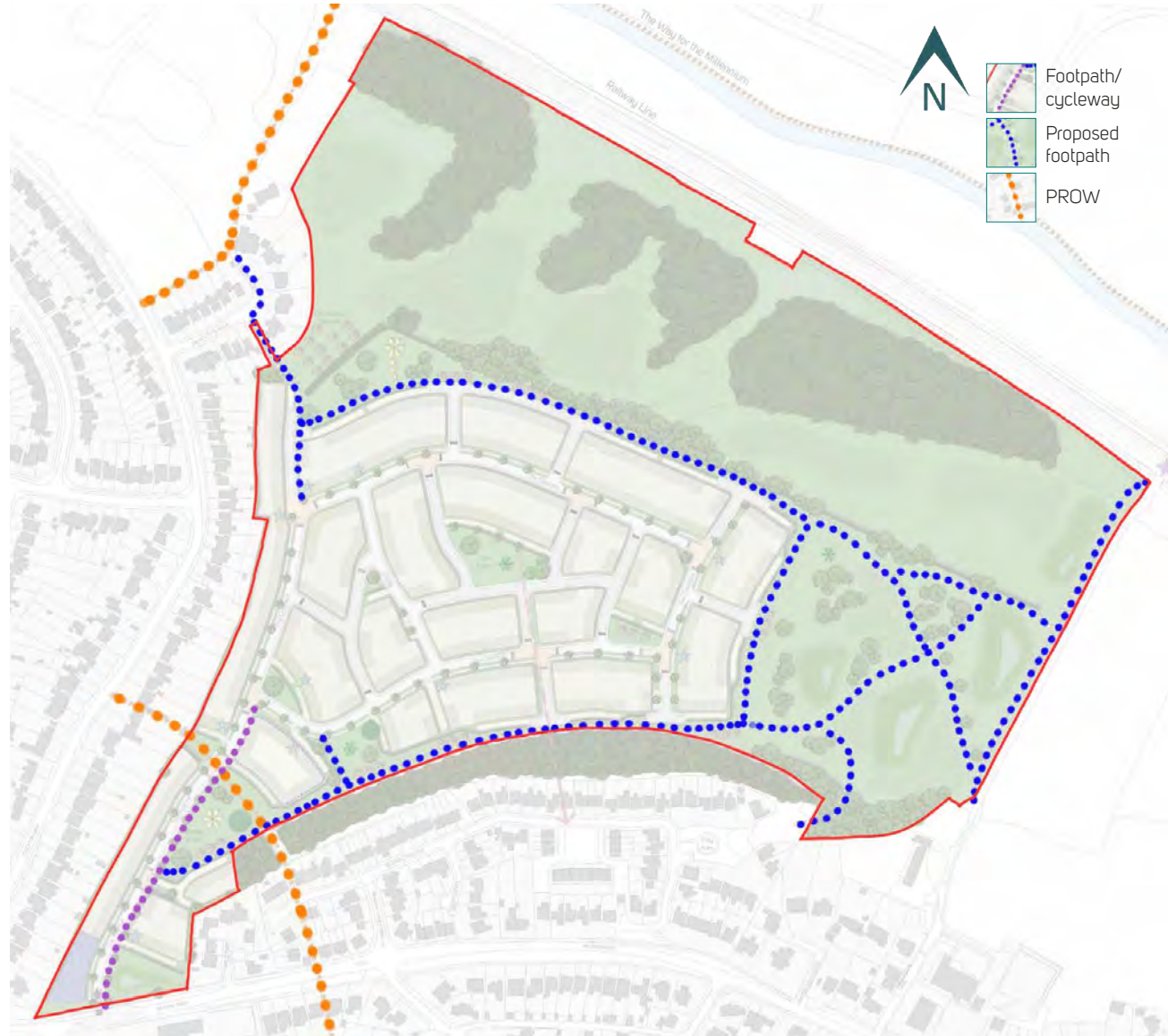
A shared footpath/cycleway is currently shown along The Avenue as one way in which emergency access could be maintained to counter the single point of access. This cycle provision would then move to in-carriageway within the site, but could potentially be extended along Milford Road (subject to viability); something that could be explored with Staffordshire County Council.



Street Hierarchy Plan

A footpath link is also proposed from the development area to Falmouth Avenue to the north-west of the site. This allows for access to the wider PRoW network and to The Way for the Millennium circular walking route, providing access to the nearby countryside as part of a healthy lifestyle. Falmouth Avenue also allows for pedestrian and cycle access to the nearby services and facilities in Weeping Cross.

The Illustrative Masterplan also shows an intent to form a network of footpaths within the site that provide opportunities for both the new and nearby existing residents to access areas of new publicly accessible open space, focused on an internal looped route.








Pedestrian Links





Layout Plan

-  Open space
-  Feature building
-  Feature square
-  Outward facing dwellings
-  View of St Thomas Church



Landmark building

Layout and Form

The residential and community use areas defined by the Illustrative Masterplan utilise land that is suitable for development, avoiding more steeply sloping parts of the site, with streets and cells set out to respond to the contours of the land where necessary.

Perimeter blocks formations are shown across the scheme that result in active frontages and front doors addressing streets and locate private gardens securely to within the cell. At the western edge of the site, perimeter blocks are completed by backing new homes on to the exposed rear boundaries of existing ones.

It is anticipated that buildings will generally be two storeys tall, with the potential (subject to further assessment work) that taller buildings of up to three storeys could be used to enhance character, enclose streets and act as legible features.

Locations are identified across the Illustrative Masterplan that would be suited to landmark buildings or groups of buildings to aid way-finding and contribute to character. These buildings compliment a series of nodes that occur in important places and promote a real sense of place; two such spaces are shown that celebrate existing trees protected by TPOs. Nodes are typically located at

important intersections along the primary street network, so that they are experienced by most people and are therefore able to function as legible elements of the place.

There is also a centrally located area of open space shown within the main development area of the Illustrative Masterplan from which, subject to further assessments and earthworks proposals, it may be possible to retain a view of the spire of St Thomas Church in Walton on the Hill. This would provide a visual link to the local area, reinforcing the church spire as a legible landscape feature.





Green Infrastructure Plan



Green-Blue Infrastructure

A significant proportion of the site - approximately 60% - is defined by the Illustrative Masterplan for use as open space. The emerging Green-Blue Infrastructure strategy proposes that it could be divided into two distinct areas;

Land north of the existing east-west hedgerow falls away steeply toward the railway line and is not suitable for development. It does however, offer an interesting potential to become either;

- A sanctuary for nature as a biodiversity enhancement area; and/or
- A new local country park that would be accessible from the surrounding residential areas and well connected to wider walking routes.

Land more closely associated with the development area defined by the Illustrative Masterplan would then be available for open space provision that is focused on policy requirements for children's play and amenity open space.

It is anticipated therefore, that policy compliance can be achieved in respect of open space requirements, other than potentially for sports provision due to the topography of the site. It is anticipated there would be contributions made toward improvements to existing local facilities instead. Similarly, it is considered likely that at least 10% Biodiversity Net Gain could be achieved, as well as significant gains in hedgerow units.

A sustainable drainage strategy would be developed as the scheme evolves, to ensure that run-off rates from the site are managed to acceptable standards and that development would not increase flood risk in the wider catchment area. The Illustrative Masterplan shows a series of attenuation basins cascading down the slope in the north-east of the site which it is anticipated would serve the majority of the development area. A basin is also shown at the frontage of the site along Milford Road, anticipating that the existing topography would form a small catchment area in this part of the development zone that would not naturally fall to the north-east. As the scheme progresses and the

sustainable drainage strategy evolves, it may be that It could include other features to enhance the treatment train, such as swales and/or rain gardens along primary streets and through green corridors.

The Illustrative Masterplan shows how it would be possible to retain the two existing TPO trees as important elements of the place-making strategy and also to retain the existing hedgerow in the north as a mature boundary for the development zone. An intent is shown also, to create tree-lined primary streets in accordance with National guidance and to create green spaces within the development area that contribute to the character of the place.



Character

Further work will be undertaken during the preparation of an application to ensure that details of local character are considered as inspirations for this new place. However, given the apparent lack of a strong single local unifying character, there is the potential here that a distinct new character could be defined. Given the TPO trees within the site and existing “green” context of the site, a landscape-led character could be created that is focused on the use of trees and hedges within the streetscene. Use of different building forms could then be used to create differences in character across the site, by street typology and/or character area so that, for example detached buildings with hipped roofs are used on outward-facing edges, gable-fronted dwellings address primary streets and more simple forms dominate other areas.



Where the local context is poor or generic, do not use this as a justification for more of the same.

Building for a Healthy Life



Character Areas Plan



6

CONCLUSIONS

This Vision Document has been prepared by Hallam Land Management, who control land to the north of Milford Road in Walton-on-the-Hill, with the aim of promoting it as a suitable, available, flexible and deliverable location for housing, complementary local facilities and/or community uses, newly accessible areas of open space and a large area that could potentially be set aside to deliver biodiversity enhancements.

The site is located to the south east of the main urban area of Stafford, extending to approximately 29ha (71.5 acres) and currently comprises agricultural land, scrub and woodland. At its south-western end, the site rises northward to reach a relatively flat area in the western/central part of the site before descending steeply northwards towards the railway line and eastwards towards Green Gore Lane. The site is bound by residential development to the south, east and west

The site has been consistently promoted for development throughout the Local Plan process by Hallam Land Management. Although the site was not allocated for development, an outline application was submitted In September 2014 for the development of up to 225 new dwellings, a local convenience store and community parklands within the site. The application was submitted and subsequently withdrawn in December 2014 on the basis that, at the time, the Council could demonstrate a 5 supply of housing land.





The Stafford Strategic Housing and Employment Land Availability Assessment (SHELAA) (2022), which informed the preparation of the emerging Local Plan, identifies the site under reference BERO4 – Land at Milford Road, ST17 OJP. The SHELAA confirms that the site is available, suitable for development, is adjacent to the existing settlement, is potentially financially viable for development of up to 613 dwellings.

This document and the accompanying planning representations set out the wide range of benefits that allocation of the site would bring and it is considered that the site is sustainable and can be comprehensively developed for housing and potentially associated uses. The site is also demonstrated to be a suitable, achievable and deliverable in order to accommodate further housing growth. The accompanying planning representations also demonstrate that the site performs strongly against other sites in Stafford identified within the draft Local Plan.

Therefore, it is recommended that the site should be allocated for housing to contribute to the overall supply of housing land within the Borough and assist in the regeneration of the locality. The site can be delivered in the short term, is within a sustainable location and can make a viable contribution to the vitality and sustainability of the nearby villages.



Emerging Illustrative Masterplan









APPENDIX 2 – TRAFFIC AND TRANSPORT APPRAISAL

Hallam Land Management
Stafford
Traffic and Transport Appraisal
November 2022
(Revision B, December 2022)



**BANCROFT
CONSULTING**

bancroftconsulting.co.uk

STAFFORD
TRAFFIC AND TRANSPORT APPRAISAL
NOVEMBER 2022
(REVISION B, DECEMBER 2022)

1.0 INTRODUCTION AND BACKGROUND INFORMATION

- 1.1 Bancroft Consulting were appointed by Hallam Land Management to provide highways and transport advice in respect of a residential development on land at Milford Road (A513) in Stafford. This report has been prepared in response to the ‘Stafford Borough Local Plan 2020 – 2040 Preferred Options’ document which is currently subject to consultation until 12 December 2022. The document is available to view online at <https://www.staffordbc.gov.uk/local-plan>.
- 1.2 By way of background, the site at Milford Road was subject to a planning application (Stafford Borough Council Ref: 14/20878/OUT) in 2014. The application was supported by a full suite of technical documents including a Transport Assessment and Framework Travel Plan. However, it was subsequently withdrawn in December 2014, with the main reason being that *“the Council can demonstrate a 5-year supply of housing land. The Council has more appropriate, viable and deliverable land available for housing so that the less preferable application site is not required.”*
- 1.3 As the Milford Road site has not been included within the Preferred Local Plan Options document, the objective of this Traffic and Transport Appraisal is to provide a high-level assessment of the site and ultimately outline why it should be allocated within any future Local Plan. The report will also review the transport credentials of two other sites; ‘Land at Ash Flats Lane’ and ‘Meecebrook Garden Community’ which have been identified and assessed because of concerns about their deliverability despite being included in the document. For ease of reference, the report will be structured as follows:
1. Introduction and Background Information.
 2. Land at Ash Flats Lane (site location shown in **Figure 1**).
 3. Meecebrook Garden Community (site location shown in **Figure 2**).

4. Milford Road Site (site location shown in **Figure 3**).
5. Summary and Conclusions.

- 1.4 This report has been completed as a desktop study and has been informed by a range of documents available online. The majority of technical information presented in this appraisal has been extracted from documents that are available on the Stafford Borough Council planning database (<https://www12.staffordbc.gov.uk/online-applications/>). The relevant planning references and website links to the information used will be provided throughout the report.
- 1.5 This Traffic and Transport Appraisal has also considered current overarching guidance within the National Planning Policy Framework (MHCLG, July 2021). In respect of highways, this document states the following:

“The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.” (Paragraph 105).

“In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

- a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*
- b) safe and suitable access to the site can be achieved for all users;*
- c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and*

d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost-effectively mitigated to an acceptable degree.” (Paragraph 110).

“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.” (Paragraph 111).

2.0 LAND AT ASH FLATS LANE

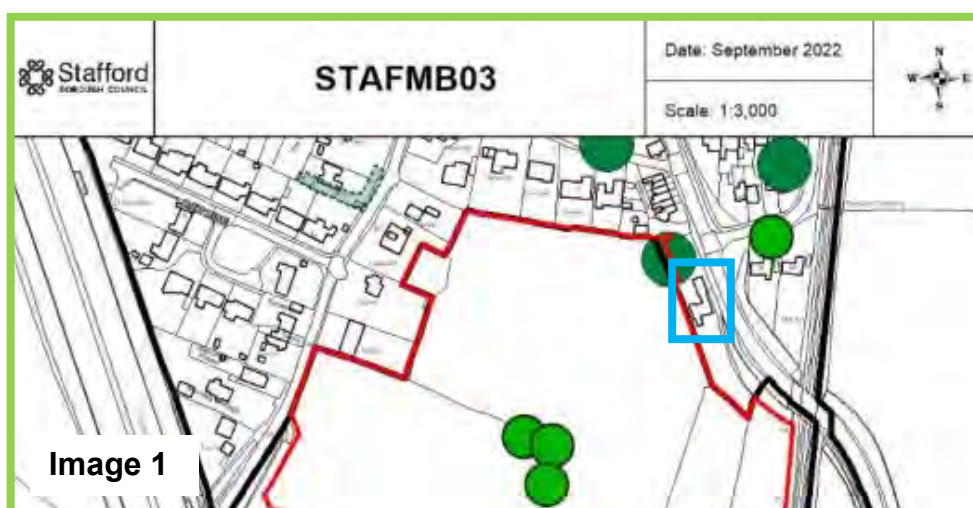
2.1 Reference in Local Plan Document

2.1.1 The site is included within the preferred options document and is referred to as 'Land at Ashflats' (Site ID: STAFMB03). It has a site area of approximately 12.76 hectares and is outlined as delivering up to 268 dwellings.

2.1.2 Within the document it is outlined that the site has several specific requirements which are presented below:

- Contributions to a bus service would be required.
- Full ecological surveys of grassland areas on site should be carried out, along with any required mitigation as a result.
- Create an area of habitat to allow for continued habitat connectivity.
- Retain woodland, in-field trees and hedgerows.
- Retain views east to Cannock Chase.
- Provide landscape buffers to the east and west to mitigate against M6 and rail lines.
- Focus development to the north adjacent to the existing settlement.

2.1.3 Specific mention is also made to the proposed site access strategy which states *“access to be provided by the demolition of Lawford House (would need to provide evidence of ownership), potentially by a priority junction.”* An extract from the document shown in **Image 1** below confirms that this house (shown in the blue box) is located outside of the redline site boundary.



2.2 Background Information and Planning Application

- 2.2.1 The site was subject to a planning application submitted in October 2013 (Stafford Borough Council Ref: 13/19524/OUT) for proposals to *“demolish Lawford House; residential development (outline for up to 320 dwellings) and main access details submitted for approval”*.
- 2.2.2 The application was supported by a full suite of documents including a Transport Assessment (TA) and a Framework Residential Travel Plan which were both produced in August 2013. According to the TA, the development proposals were for up to 339 dwellings with vehicular access provided via a new junction at Moss Pit (A449).
- 2.2.3 Consultee comments received from Staffordshire County Council (SCC) acting in their role as the Highway Authority dated 30 December 2013 confirm that they offered their support of the development subject to five conditions. It also outlined that they would require the developer to enter into a Section 106 Agreement to secure £6,200 for Travel Plan monitoring and £40,000 towards the implementation of Real-Time Passenger Information at nearby bus stops.
- 2.2.4 The application was subsequently refused on 24 February 2014 for non-highway-related issues. Within the Decision Notice, the main reasoning behind the refusal is that *“the Council has more appropriate, viable and deliverable land available for housing so that the less preferable application site is not required”* and that *“this application is a substantial residential proposal that lies outside the identified Strategic Development Locations.”*
- 2.2.5 The application was then subject to an Appeal Process (Ref: APP/Y3425/A/14/2217578). The Appeal Decision was issued on 3 December 2014 outlining that the appeal was dismissed. Although there were no highway points in dispute (supported by the Statement of Common Ground agreed with SCC), the inspector made several points concerning the proposed site access arrangement including:

“The highways authority (SCC) and the Council are both satisfied with the single priority junction proposed, supplemented by an emergency access arrangement. Especially bearing in mind the comments of the Inspector who considered objections to the 2001 Local Plan, that visibility is impeded by the alignment of the (railway) bridge, I accept that the proposed access appears counter intuitive.”

“The proposed development necessarily includes the demolition of Lawford House to accommodate the access works.”

2.3 Site Access

2.3.1 The proposed development would be served via a single point of vehicular access on Moss Pit (A449). The access would comprise a priority T-junction with a ghost island right turn lane as shown in **Image 2** below. No dimensions appear to be shown on the submitted access drawing, but it is understood to provide a 5.5 metres-wide carriageway, 10 metres kerb radii, 2 metres wide footways and 3 metres wide right turn lane. A tactile paving crossing would be provided at the access and to the north where a new pedestrian refuge island is proposed.



Image 2

2.3.2 The report also outlines that the visibility splays at the access along Moss Pit are based on the requirements outlined within Manual for Streets for a 30mph speed limit. This guidance states that visibility splays of 2.4 x 43 metres are required, however, paragraph 3.2.2 of the submitted TA states that the junction would only provide splays of 2.4 x 40 metres. Nevertheless, the drawing demonstrates that the actual maximum achievable splays are above 70 metres in each direction. It is understood that the access arrangement shown was subject to detailed consideration by the Highway Authority and eventually agreed upon followed by what is described as “18 months of detailed discussions”.

2.3.3 As shown in **Image 2** above, the access junction would extend through the middle of Lawford House and the associated garden area. Despite this requirement, the TA appears to make no reference to this and does not clarify if this land is owned by the developer or if an agreement is in place to secure this area. Similarly, within the access drawing shown in **Image 2**, the area that is highlighted in grey is labelled as being within the ‘adopted highway boundary’. It is unclear what the boundary is based on and in the absence of any formal highway boundary plan included within the report, this cannot be confirmed. From experience, the adopted highway boundary is usually defined by the back of the footway on either side of the carriageway.

2.3.4 Having reviewed Google Earth mapping (dated June 2022), **Image 3** below illustrates that the existing footway along the site frontage is separated from Lawford House by a fence line. Furthermore, the lampposts are positioned at the back of the footways which supports the view that this usually signifies the end of the adopted highway extent.



2.3.5 In support of this report, Hallam Land Management have conducted their own search to establish who owns Lawford House and the surrounding parcel of land. This search suggests that it is currently owned by National Highways and separates the site from Moss Pit. Without any evidence of an agreement in place between the developer and National Highways, it is considered reasonable to suggest that there is a potential for a ransom situation to occur between each landowner. Given that this land is required to facilitate the sole access to the development, it is clearly of significant value to the developer which is likely to only increase the purchase price requested by the landowner. There are also no guarantees that the owner of Lawford House may want to sell their land or demolish their home even with a large financial offer.

2.4 Sustainable Transport

2.4.1 The site is considered to have good sustainable transport credentials, with the TA providing a review of the non-car accessibility of the development. In summary, this section confirms that good pedestrian infrastructure already exists near the site, including 2 metres wide footways on Moss Pit which extend north towards Stafford Town Centre which is approximately 3 kilometres away. It is also within walking distance of several local amenities such as a health centre and food store. There are also some cycle routes within 2 kilometres of the site, however, this would require cyclists to travel within the carriageway to reach.

2.4.2 The TA also confirms that the nearest bus stops to the site are located on Moss Pit and within 200 metres from the centre of the site. This leads the report to conclude that *“the site is accessible by bus, with up to 3 buses per hour operating within 400 metres of the site”*. Given the large section of land the site would occupy, this point has been checked using Google Earth mapping. Based on the site boundary shown indicatively in red in **Image 4** below, an illustrative catchment area has been drawn in blue to highlight the areas of the site that could realistically be within 400 metres of the existing bus stops on Moss Pit shown in yellow circles. This is not considered to represent a robust assessment as it is based on residents walking directly to the access junction when in reality, the masterplan is likely to comprise a comprehensive network of streets and increase the walking distance for residents.



2.4.3 The above image suggests that only around half of the proposed development would be within 400 metres walking distance of the existing bus stops on Moss Pit. Whilst this confirms that all of the northern section of the development would meet the bus stop criteria, anyone in the southern half would be required to walk more than 400 metres to access the bus stops. Initial measurements suggest that anyone living in this section of the site could actually be required to walk nearly double this distance and be closer to almost 800 metres walking distance from the bus stops. This is unsurprising given the large scale of the development. Given that the site does not technically comply with best practice guidance for all residents, the potential to provide an internal bus service should be explored.

2.4.4 Not only would an internal bus service require a larger access junction to be provided (potentially increasing the carriageway width to a minimum of 6 metres), but it may also require changes to the right turn lane length to accommodate longer queue lengths, for example, the potential for a bus and several cars attempting to

turn into the site. It is also important to note that the existing bus stops on Moss Pit currently comprise only a flag and pole arrangement. Whilst it is appreciated that the developer would improve these to include Real-Time Passenger information, for a scheme of this size it is typically expected that they should be upgraded to sheltered arrangements to better serve any future residents.

2.4.5 Notwithstanding the above, it is important to note that buses will rarely divert into a cul de sac layout and usually a second point of vehicular access will be required. Given that this site is unable to deliver this requirement, it is highly unlikely that an internal bus route would be achievable. Due to this, the whole basis of the conclusions reached in the TA regarding accessibility by bus is considered to be questionable and in reality, a considerable number of residents would have to walk more than the required distances to reach the nearest bus stops.

2.5 Traffic Generation and Highway Capacity

2.5.1 Using the trip rates included within the TA, it is calculated that the development of up to 339 dwellings could generate up to 196 two-way vehicular trips during the morning peak hour and 215 two-way trips during the evening peak hour. However, the TA outlines that all of the junction modelling completed in support of the application is based on only 300 dwellings. This is justified by the statement that *“there is likely to be a figure of around 30% affordable housing on the site which tends to produce a much lower traffic generation per unit”*. This position is considered to be weak, especially as the TRICS database includes surveys of affordable housing that could have been used. On this basis, it is considered that simply excluding nearly 40 dwellings from the traffic generation assessment of the development is concerning.

2.5.2 Despite the above, the junction modelling presented in the TA has been reviewed. This included an assessment of five junctions, including the site access on Moss Pit along with four off-site junctions. The assessments were based on a 2016 future year and included scenarios both with and without development traffic. Given that the report was issued in August 2013, the future year scenarios used only represent three years after the application. In accordance with the Department for

Transports ‘Guidance on Transport Assessment,’ a widely accepted starting point for future year assessments is five years after the application. Furthermore, any junction on the strategic road network (including the A449) should also be modelled for 10 years after the application. Based on this guidance, the modelling of a 2016 scenario is considered to be inappropriate and not representative of the development’s true impact on the surrounding road network. In line with the overarching guidance, the modelling should have been based on 2018 (application plus 5) and 2023 (application plus 10) traffic flows both with and without development traffic.

2.5.3 Nevertheless, perhaps the most important modelling assessment for any development is the site access junction to establish if its suitability designed to operate safely and within capacity. Considering this, the TA presented the following modelling results shown in the table below.

Arm	2016 With Development			
	AM		PM	
	RFC	Max Q	RFC	Max Q
Site Access	0.830	4	0.520	1
A449 RT	0.060	0	0.210	0

Table 6.1 - Summary of PICADY Output for A449/Site Access

2.5.4 The above confirms that during 2016 with the development scenario, the site access arm of the junction would operate with an RFC of 0.83 during the morning peak hour and 0.52 during the evening peak hour. Whereas Moss Pit would have an RFC of 0.06 in the morning peak and 0.21 in the evening peak. Based on these results the TA concludes that the site access junction would operate within its theoretical capacity and could adequately accommodate the development traffic.

2.5.5 For reference, an RFC value of less than 0.85 indicates that the junction is operating within capacity, whilst an RFC value of between 0.85 to 1 indicates that

the junction could experience occasional periods of congestion. If the RFC value is over 1 then this suggests that the junctions are saturated. Considering this and noting the above points regarding traffic generation and future year scenarios used, there are significant concerns that the results provided are showing that the site access junction is already nearing congested conditions during the morning peak hour. Because of this, the modelling results included in the TA appendices have been reviewed in more detail. As shown in **Image 5** below, the modelling results confirm that during the morning peak hour the access arm would have a delay of 102.52 seconds per vehicle and 53.25 seconds during the evening peak hour. Due to this, it is unsurprising that the junctions 'Level of Service' (LOS) is graded at F during the morning peak hour and D in the evening peak hour which clearly suggests that the junction is already struggling to operate satisfactorily.

Summary of junction performance

	AM						PM						
	Queue (PCU)	Delay (s)	RFC	LOS	Junction Delay (s)	Junction LOS	Queue (PCU)	Delay (s)	RFC	LOS	Junction Delay (s)	Junction LOS	
Proposed Site Access - 2016 With Dev Flows													
Stream B-AC	3.81	102.52	0.83	F	88.83	F	1.01	53.25	0.52	F	32.37	D	
Stream C-AB	0.07	9.72	0.06	A			0.27	12.66	0.21	B			
Stream C-A	-	-	-	-			-	-	-	-			-
Stream A-B	-	-	-	-			-	-	-	-			-
Stream A-C	-	-	-	-			-	-	-	-			-

Image 5

2.5.6 Aside from the site access junction, the submitted modelling also suggests that two off-site junctions would also be experiencing capacity problems in the 2016 future year scenario. The first is the A449/West Way signal-controlled junction (circa 1.8 kilometres from the site) which would already have a queue of 156 PCUs (circa 936 metres) in the morning peak hour and 108 PCUs (circa 648 metres) in the evening peak hour on the A449 northbound arm even without the development traffic. With the development traffic added, these queues would increase by 14 PCUs (circa 84 metres) in the morning and 20 PCUS (circa 120 metres) in the evening. Despite this, no mitigation is offered based on the development traffic having a 'negligible impact.' The second is the A449/Rickerscote Road signal-controlled junction (circa 1.1 kilometres from the site). This junction also already experiences significant queuing during the evening peak hour without development traffic. For example, the A449 northbound arm would have a maximum queue of 91 PCUs (circa 546

metres) and 94 PCUs (circa 564 metres) on the A449 southbound arm. Again, no mitigation is proposed based on the development traffic having a negligible impact.

2.6 Summary and Conclusions

- 2.6.1 Based on the appraisal above, it is clear that there are several key outstanding concerns regarding the proposed development. It has been confirmed that the sole access to the site is subject to third-party land to be deliverable. Given that there are no other options for where access could be provided as an alternative, it must be concluded that without an agreement in place for the purchase of Lawford House, the development is simply not guaranteed.
- 2.6.2 Furthermore, there are serious doubts over the suitability of the access layout presently shown. This is confirmed by the modelling results presented within the TA that outline that there would be significant delays even when assessed on a '2016 future year scenario'. This should be considered very worrying given that the Local Plan period is 2020 to 2040 and it is highly likely that the junction simply would not be able to operate safely if assessed with a more realistic future year. Any access junction would likely need to be significantly larger and likely to be either a roundabout or signalised junction on Moss Pit A449. This would require major changes to the existing road network and is likely to be constrained by third-party land and the railway bridge to the south.
- 2.6.3 Aside from the access, there are several other concerns to note, including the fact that a large section of the development would be outside of the maximum walking distance of the nearest bus stops. Similarly, the modelling suggests that several nearby junctions are already experiencing significant delays and queuing. This will only be made worse by the additional development traffic and despite this, no mitigation or contributions to help relieve the situation has been offered.
- 2.6.4 On this basis, it is considered that if a planning application were to come forward for the development as currently proposed it would likely be refused for the reasons outlined above. Because of this, it is not considered to be suitable to include as a preferred option for the Local Plan.

3.0 MEECEBROOK GARDEN COMMUNITY

3.1 Reference in Local Plan Document

3.1.1 Meecebrook Garden Community is included within the preferred options document and is given its own specific section which outlines the high-level principles of the potential development. The document outlines that land has been allocated at Cold Meece for a significant new settlement which would include the following developments:

- At least 3,000 dwellings within the plan period.
- Potential for future development beyond the plan period to provide at least 6,000 dwellings in total.
- Circa 15 hectares of land for employment use within the plan period.
- Potential for future development beyond the plan period to provide at least 30 hectares of employment land in total (this would include a provision within the town centre).
- Primary schools and nurseries.
- A secondary school.
- An anchor food store.
- A variety of food, beverage and retail uses.
- A healthcare facility with GP, a dentist and a pharmacy.
- A multi-purpose community building.
- A place of worship.
- An indoor sports facility.
- A new 'destination park' including play areas, allotments and outdoor sports areas.
- A new railway station on the West Coast Main Line.

3.1.2 In summary, the document defines the potential development as *“the creation of a new garden community to be called Meecebrook. Over a planned 30-year period, the proposals intend to create a sustainable community with supporting services and facilities in a high-quality environment.”* It is also stated that the development is

being taken forward in line with the government's 'Garden Communities Programme' and with the assistance of Homes England.

3.1.3 Within the document, it is made clear that the potential development is at a very early stage in terms of a timeline for delivery. For example, it is outlined that *“development can only commence once a route to funding and delivery in line with the phasing set out in the Framework Masterplan Supplementary Planning Document has been identified.”* It also states that *“Stafford Borough Council will work with landowners and stakeholders to bring forward comprehensive development at Meecebrook. If required, the council may consider the use of compulsory purchase powers to assist with land assembly.”*

3.1.4 Importantly, it also details that any development at Meecebrook must come forward comprehensively, accord with the requirements of the Local Plan and the relevant design and development principles. It is also made clear that *“Stafford Borough Council will not support ad hoc or piecemeal development which is contrary to the aims of this policy or is inconsistent with the framework masterplan.”*

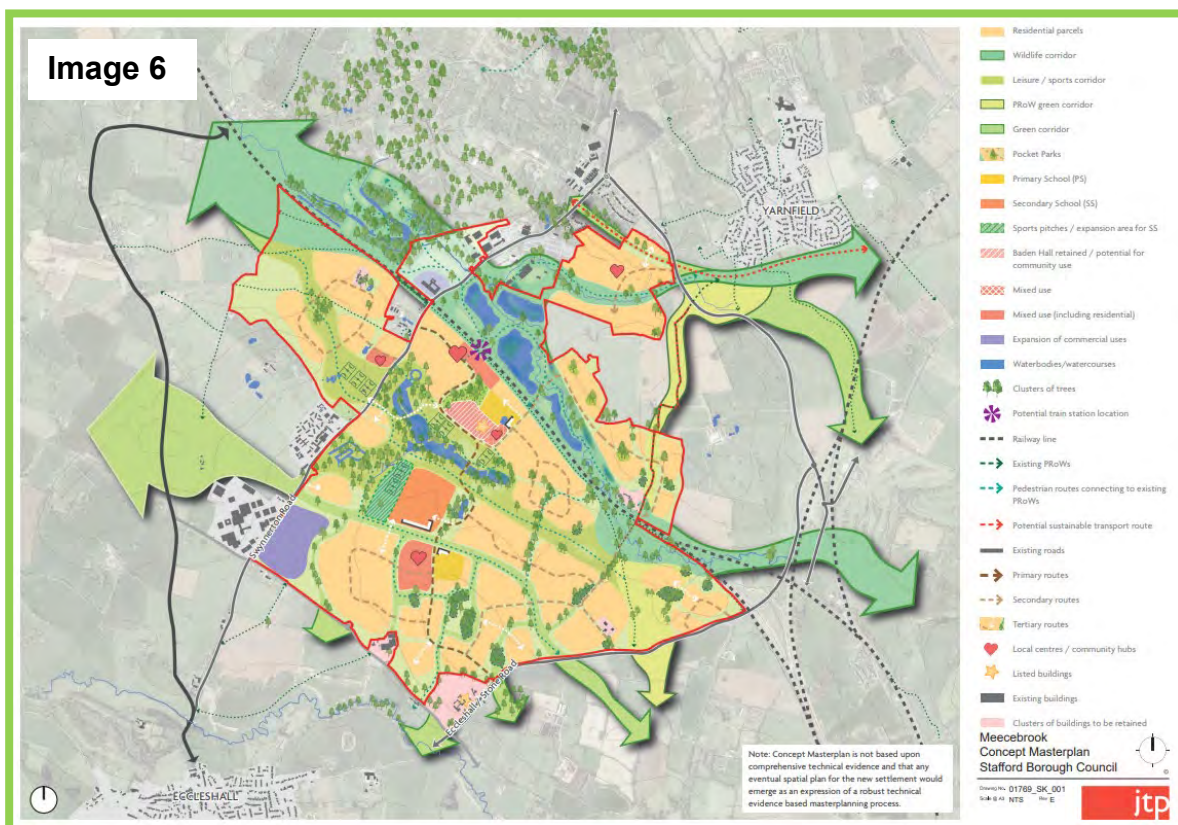
3.2 Background Information

3.2.1 As outlined above, the proposed development is at an early stage and is only currently supported by a range of 'visionary and evidence-based documents.' These documents are available online (<https://www.staffordbc.gov.uk/meecebrook-new-garden-settlement>) which details that so far, the scheme has been supported through the Government's 'Garden Community Programme' and since 2019 has received over £1 million from government funding. This money has been used to *“carry out technical studies to develop more detailed plans for the key infrastructure required, such as highway improvements, schools, water and energy provision – to support a sustainable development.”* It is important to note that upon completing this report, no detailed information or plans regarding the 'highways improvements' have been identified. Instead, these appear to be more high-level strategic ideas as outlined later in this section.

3.2.2 In support of this report, information and been extracted from the following supporting documents which are all available to view online:

- Meecebrook Information Leaflet
- Meecebrook Garden Community Vision Document.
- Meecebrook Garden Community Transport Strategy.

3.2.3 The ‘Concept Masterplan’ has also been reviewed and is shown in **Image 6** below.



3.3 Site Access

3.3.1 There are currently limited details regarding the proposed vehicular access strategy to the site. The concept masterplan shown in **Image 6** above outlines that there will be several ‘primary routes’ along with ‘secondary routes’ and a ‘potential sustainable transport route’ which will connect the site to the surrounding highway network. It also confirms that a railway line extends through the site in a north-to-south direction. What can be established from this plan is that the site is immediately surrounded by four existing roads, Swynnerton Road to the north,

Meece Road to the east, Stone Road (B5026) to the south and High Lanes to the west.

3.3.2 Based on the concept masterplan, a 'primary route' would be provided from Swynnerton Road to the north of the site near the existing railway bridge. **Image 7** below, provides an extract from Google Earth (dated July 2011) of where the access is interpreted to be positioned. At this location, the road is subject to a 40mph speed limit and is rural in character with a carriageway width of approximately 5.5 metres and centreline markings. A 2 metres wide footway is provided along the southern edge of the carriageway and no street lighting is provided. There is also existing access to a small number of dwellings and maintenance access to the railway line directly opposite where the route is being shown which is outside of the redline boundary. As shown in **Image 8** below there also appear to be some significant level changes at this point, and a notable bend as Swynnerton Road extends across the railway bridge.





3.3.3 Given the level of development the access is going to serve, it is likely to need a substantial junction layout to suitably accommodate the level of traffic generated. At the very least it will likely need to be a priority T-junction with right-turn lane facilities but may need to be much larger and include a roundabout or even a signalised junction. Given the constraints of the railway bridge, 'third party land' to the north and level differences, it is considered that significant design and engineering work is going to be needed for a compliant access junction to be provided at this location. Furthermore, **Image 9** above suggests that visibility may be restricted for any vehicles exiting the site due to the railway bridge to the northeast, especially in the vertical plane.

3.4 Sustainable Transport

3.4.1 Building on the above, sustainable transport appears to be a key focus of the development with a range of 'green corridors' and 'sustainable transport routes' included within the concept masterplan. Again, there is very little information on what would be proposed as part of the site masterplan but given the scale of the development, it is going to need to be supported by a range of infrastructure improvements to facilitate access by non-car modes. Aside from the proposed railway station, this is likely to include internal bus routes, a comprehensive network of shared footways/cycleways and improvements to the existing Public Rights of Way.

3.4.2 Aside from the improvements that would be needed within the site, an assessment of the existing sustainable transport credentials has been completed to determine

the potential level of off-site improvements needed. Firstly, the nearest bus stops have been located. These are likely to be either the ‘Hilcote Hall’ stops on Stone Road (approximately 1.6 kilometres from the centre of the site) or the ‘South Road’ stops on Meece Road (approximately 2.2 kilometres from the centre of the site). According to Google Earth, the Hilcote Hall stops are unmarked and served by two bus routes which operate five daily services to Stone Town Centre. The South Road northbound stop includes a wooden shelter and is served by one bus route that operates four daily services. On initial review, it appears that only one bus service (Route Number 103S) operates during the peak hour periods (morning only).

3.4.3 The roads surrounding the site are rural, with the majority providing no footway provision or street lighting. An example of the existing conditions of the roads surrounding the site is shown in **Image 10** (High Lanes to the east) and **Image 11** (Stone Road to the south) below. Considering the lack of infrastructure available at present, significant improvements will be required for the surrounding highway network to ensure they are safe and suitable for all road users and not just those in vehicles. This is likely to comprise a comprehensive network of footways, off-road cycleways, crossing points and bus stops. Not only will this ‘urbanise’ this section of the countryside by adding street lighting, traffic calming and different coloured surfacing, but it will also need to be delivered within the applicant's ownership boundary. This may be particularly difficult to secure to the northeast of the site as Swynnerton Road and Meece Road extend through the existing industrial estate and the edge of Yarnfield.



3.4.4 The above assessment indicates that at present, the development is considered to be providing a ‘new town’ in a location that is very remote and rural. This is reflected in the distinct lack of existing sustainable infrastructure. Furthermore, at this stage, it appears that the focus has been solely on how sustainability can be maximised within the site boundary. It is considered that this is the easy part and the real challenge that needs further assessment is how the site will be connected to the wider areas without residents being required to drive everywhere. Given the existing conditions surrounding the site, it is clear that significant improvements will be needed not just near the site but also towards and through nearby villages, including Yarnfield, Eccleshall and Swynnerton.

3.5 Traffic Generation and Highway Capacity

3.5.1 In support of the potential scheme, several ‘high level’ transport reports have been produced which feed into the overarching ‘Transport Strategy’ document dated July 2020. For reference, this document outlines the new settlement could include ‘around 10,000 homes’ which is significantly more than the proposals outlined in the Local Plan document.

3.5.2 Nevertheless, the ‘Travel Demand Model – Methodology Statement’ (April 2020), begins to discuss the potential traffic generation and trip distribution of the development. In terms of external vehicular trips, the table below confirms that the development could generate a considerable number of trips with up to 9,688 two-way vehicular trips during the morning peak hour and 8,091 during the evening peak hour.

Destination	Vehicular Trips (AM Peak)	Vehicular Trips (PM Peak)
Lichfield	169	141
South Staffordshire	182	154
East Staffordshire	202	168
Cannock Chase	271	227
Staffordshire Moorlands	318	269
Walsall	393	329
Wolverhampton	433	362
Telford and Wrekin	496	414
Birmingham	754	631
Cheshire East	676	565
Newcastle-under-Lyme	1,018	854
Stafford	2,175	1,810
Stoke-on-Trent	2,601	2,168
Total	9,688	8,091

3.5.3 In terms of the distribution of development traffic, the above table suggests that Stoke-on-Trent (an increase of 2,601 trips during the morning peak hour and 2,168 during the evening peak hour) and Stafford (an increase of 2,175 trips during the morning peak hour and 1,810 during the evening peak hour) could attract the largest number of vehicular trips from the site.

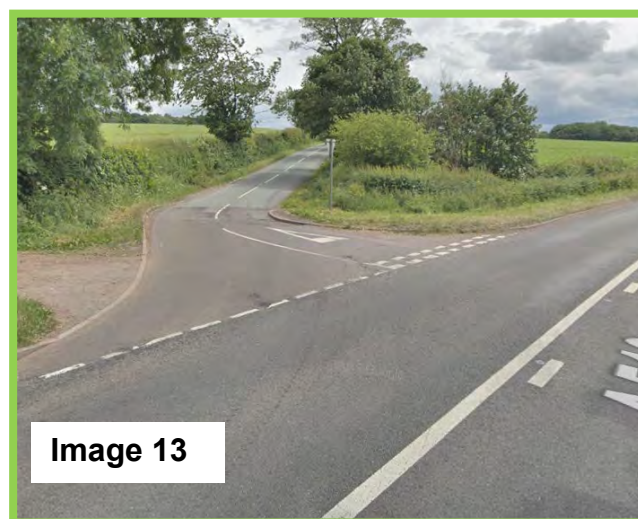
3.5.4 Stoke-on-Trent is located approximately 20 kilometres to the north of the site. Based on an initial Google Maps route planning tool assessment, it currently routes traffic from the site along Swynnerton Road, through the village of Swynnerton, along the A519 and then along Queensway (A500) to the city centre. Whilst this route may not be used by all vehicular trips, clearly there is going to be a significant impact on the road network and various junctions along this route. On initial review, it appears that the majority of roads along this route are narrow and rural, with many not providing footways, streetlighting or adequate carriageway widths to accommodate vehicles larger than a car. Similarly, lots of the junctions along this route have constrained layouts often bound by dwellings or third-party land as shown in **Image 12** below (Main Street/Tittensor Road T-Junction within Swynnerton).



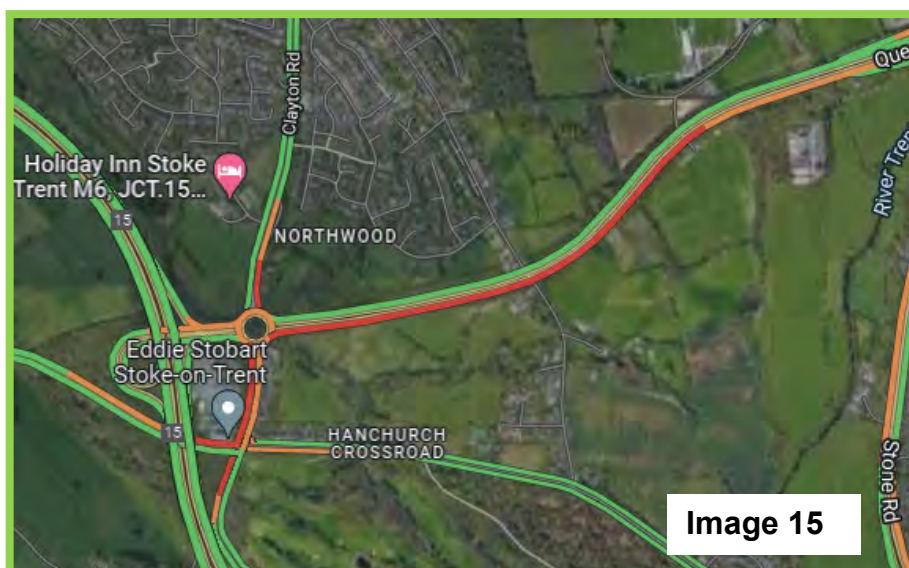
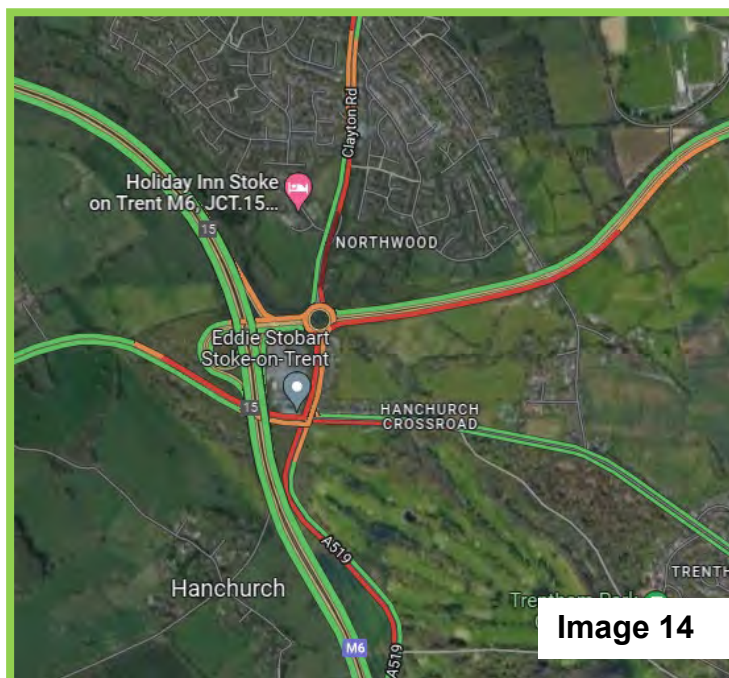
3.5.5 Furthermore, it appears that the majority of junctions would require significant improvements to their layout to accommodate the development traffic, especially by heavy goods vehicles and buses. The improvements are likely to comprise widening carriageways to at least 6.75 metres where buses and heavy goods vehicles are likely to pass each other regularly, provision of 2 metres wide footways on both sides of the carriageway (or 3 metres wide if used as a shared footway/cycleway) and additional verge to help separate vehicles and

pedestrians/cyclists. Clearly, this will significantly increase the overall footprints of the roads surrounding the site, for example, a road that is currently 5 metres wide could potentially need to be increased to an overall corridor width of 11.75 metres (comprising 6.75 metres wide carriageway, 0.5 metres wide verges on both sides and then 2 metres wide footways).

- 3.5.6 An example of this scenario is the Bottom Lane/A519 junction shown in **Image 13** below which has a skewed alignment and currently has a carriageway width of circa 5 metres.



- 3.5.7 More strategically, the Hanchurch Interchange four-arm roundabout is undoubtedly going to be an important junction as the eastern arm (Queensway) extends towards the centre of Stoke-on-Trent. Given that this junction may have to accommodate an increase of 2,601 two-way vehicular trips during the morning peak hour and 2,168 during the evening peak hour, it is worrying to see that it already appears to be struggling in terms of queuing. **Image 14** (0830 hours) and **Image 15** (1730 hours) below provides an extract of the typical traffic conditions at this junction on a Wednesday according to Google Maps. As you can see, during the morning peak hour there is already evidence of severe queuing on The Newcastle Road (A519) arm with the red line indicating that queuing could extend for almost 1 kilometre from the junction. Given that this is the arm that the majority of development traffic will use to access Stoke-on-Trent this should be considered a severe concern.



3.5.8 Given the level of traffic the development could generate, it is unsurprising that the transport work completed to date clearly outlines that *“mitigation and/or strategic intervention will be required to accommodate the proposed garden settlement at Meecebrook.”* Although the extent of the mitigation and strategic measures is unclear at this stage, the fact that the reports stated that it could *“include highway mitigation measures at key locations on the Strategic Road Network”* and that it may require *“an additional motorway junction to provide additional access to the M6 Motorway”* is considered to be telling. Not only will the costs to deliver such improvements likely be into the millions of pounds (noting that the report states that the junction modelling alone could cost up to £450,000 excluding data costs), but it

will also result in widespread roadworks and delays to the existing road network surrounding the site including the M6 Motorway for a significant period of time.

3.6 Summary and Conclusions

3.6.1 Whilst on face value the proposed Meecebrook Garden Community appears to offer a chance for a significant new development with a sustainable focus, even at this very early stage, several major concerns should be considered before any decision is made on its inclusion with the Local Plan.

3.6.2 Based on the little technical details currently provided, it is clear that so far the focus has been solely on how sustainability can be maximised within the site boundary. This is considered to be the 'easy' part of ensuring that the development is sustainable (subject to the amount of money available to deliver the internal infrastructure required) and that the real problem will be how the site is integrated into the surrounding area. At this stage, it appears that this point has been overlooked, and the level of improvements needed to ensure that the surrounding highway network is suitable for cyclists, pedestrians and public transport users has not been appreciated. The roads surrounding the site are rural with no footways, streetlighting and narrow carriageway widths. To offer a realistic connection from the site to the surrounding areas that do not rely on the use of a car, these will need to be improved significantly and will undoubtedly 'urbanise' what is currently a very rural location.

3.6.3 Not only will the surrounding area be urbanised with footways, cycleways, increased carriageway widths and street lighting, but the nearby villages will also be impacted by thousands of new vehicular trips to and from the site. To accommodate this increase in traffic major strategic highway improvements will be needed, including new junction layouts, increased carriageway widths and potentially even a new junction to the M6 Motorway. It is considered that to date, no precise impact assessment of the development has been undertaken or confirmation if the traffic could be realistically accommodated.

- 3.6.4 The cost of the development will also be significant, reflected in the fact that the transport modelling alone is quoted at costing up to £450,000. It must also be questioned if the development would be deliverable within the Local Plan period of 2020 to 2040. Given the level of work that is required before a planning application could be submitted, it is considered that the possibility of even beginning construction is at least 5 years away (once all of the planning conditions and detailed design has been completed). This is considered to be a low estimate when noting the significant amount of third-party land required which will require complex negotiations to be used to offset the impact of the development.
- 3.6.5 Furthermore, based on experience, even once the construction is underway realistically only approximately 100 to 200 dwellings could be built each year due to the organisation of materials required and commercial timelines for housebuilders. Given that there would be a minimum of 3,000 houses proposed, the delivery of this section alone could take anywhere between 15 to 30 years to complete. This does not include the construction of the railway station, healthcare centre, indoor sports facility or schools. The ability to deliver a development that is not 'ad hoc' or 'piecemeal' is therefore considered to be unrealistic.
- 3.6.6 On this basis, it is considered that this development should not be preferred over more realistic and deliverable schemes within any future Local Plan.

4.0 MILFORD ROAD SITE

4.1 Background Information and Planning Application

4.1.1 The site was subject to a planning application submitted in September 2014 (Stafford Borough Council Ref: 14/20878/OUT) for proposals to *“develop up to 225 dwellings, a local convenience store of up to 250sqm GFA and community parklands with details of a new access from Milford Road”*.

4.1.2 The application was supported by a full suite of documents including a Transport Assessment (TA) and a Framework Travel Plan which were both produced in July 2014. The TA followed extensive pre-application discussions with Highway Officers at SCC regarding the proposed development and also the submission of a Scoping Report in October 2013.

4.1.3 The first set of consultee comments received from SCC acting in their role as the Highway Authority was dated 8 October 2014 and recommended refusal for the following reasons:

1. *“The proposed site access fails to comply with DMRB TD42/95 as it is geometrically substandard in its design furthermore its location creates possible vehicular conflict with the operation of an existing access point.”*
2. *“The proposed mitigation scheme at the Weeping Cross A513/A34 junction is not currently deliverable without the utilisation of third-party land. Accordingly, it would not be appropriate to secure contributions to such mitigation. In the absence of such contributions, it is not possible to adequately mitigate the impact of the proposed development on the surrounding highway network.”*
3. *“The submitted travel plan fails to provide adequate measures to encourage modal shift.”*
4. *There is insufficient information provided to enable a full assessment of the transport implications of the proposed development to be undertaken as the traffic data submitted as Appendix A in the Transport Assessment is missing.”*

4.1.4 Following the initial set of consultee comments, further work was undertaken to try and address SCC’s outstanding concerns. In an email dated 31 October 2014 it

was confirmed that a revised access drawing with the requested dimensions, a revised Travel Plan with stronger incentives to encourage sustainable modes and a drawing outlining a potential combined footway/cycleway along the southern edge of Milford Road towards the Weeping Cross roundabout was submitted.

4.1.5 SCC responded to the additional work undertaken in an email dated 7 November 2014 confirming the following:

1. *"I've checked the revised access drawing and the illustrated geometry complies with SCC requirements; however, I would suggest the revised layout is subject to a Stage 1 Road Safety Audit".*
2. *"The revised Travel Plan which contains additional measures to encourage modal shift is acceptable."*
3. *"The combined footway/cycleway illustrated in drawing no. SK-05 rev A is considered beneficial; however as there is an impact from your development at the Weeping Cross junctions, which is already subject to congestion, a contribution in proportion to the impact of your development is sought towards a deliverable scheme at this location. At the current time, a scheme capable of offering capacity benefits is not deliverable due to land ownership constraints and accordingly, I am unable to seek a contribution to a scheme that is not certain of coming forward. However, a meeting is taking place shortly with the Police Authority (whose land is required to deliver the scheme) to discuss its deliverability and accordingly the Council may be in a position to seek contributions to the scheme in the near future."*

4.1.6 It was subsequently confirmed in an email dated 2 December 2014 that all of the Highway Authority's concerns had been addressed (subject to a Road Safety Audit of the access), apart from reason 2 of the initial consultee comments. On this point, the Highway Officer stated that *"reason 2 still stands as a deliverable mitigation scheme has not been identified (I understand that discussions are taking place with the Police Authority into utilising land within their control to enable a mitigation scheme to be identified and contributions sought)"*.

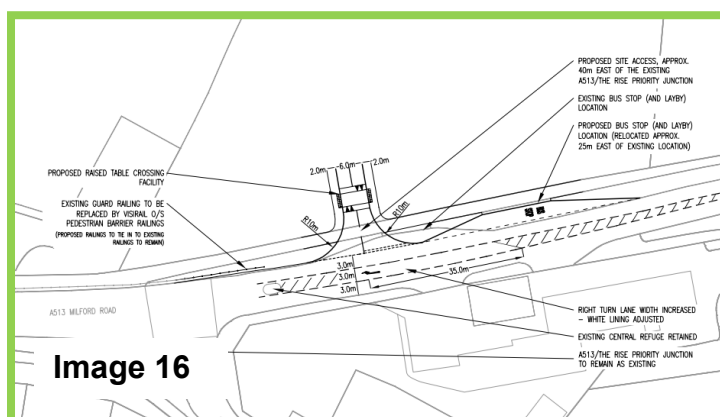
4.1.7 The application was subsequently withdrawn on 4 December 2014. Within the main reasoning being that *"the Council has more appropriate, viable and deliverable land*

available for housing so that the less preferable application site is not required” and that “this application is a substantial residential proposal that lies outside the identified Strategic Development Locations.” It was also stated that “the proposed mitigation scheme at the Weeping Cross A513/A34 junction is not currently deliverable without third-party land and it is not possible to secure contributions to such works, which would be necessary to adequately mitigate the impact of the proposed development on the surrounding highway network”.

4.1.8 Considering the above, it appears that the site was withdrawn for a similar reason to Land at Ash Flats Lane mentioned earlier in the report. It is also considered that the one outstanding highway concern was a result of a planning deadline and time running out on the discussions needed with the Police Authority. Nevertheless, the Milford Road development has not been included in the Local Plan preferred options document.

4.2 Site Access

4.2.1 The proposed development would be served by a new vehicular access on Milford Road (A513). The access would comprise a priority T-junction with a ghost island right turn lane as shown in **Image 16** below. The junction would provide a 6 metres wide carriageway, 10 metres kerb radii, 2 metres-wide footways and a 3 metres-wide right turn lane. A raised table crossing facility with tactile paving would be provided at the access and the existing bus stop on Milford Road would be relocated circa 25 metres east of its current position. The layout was subject to a variety of swept paths including a large car. Emergency vehicle access would also be provided via Green Gore Lane which would be gated to prevent general vehicular access at all other times.



4.2.2 The TA outlines that the proposed access can achieve appropriate visibility splays along Milford Road, and these were agreed upon as part of the Scoping Report. These splays would be secured by the large footway and verge area that extends along the site frontage as shown in **Image 17** below. Given the location of the existing bus stop and lampposts, this area is considered to be within the adopted highway boundary and does not appear to rely on any third-party land.



4.2.3 The access was subject to an initial Road Safety Audit as part of the submitted TA, with all problems raised being addressed. There are no details regarding a revised Safety Audit requested by SCC, however, it is considered that no significant issues would have been raised as the layout conforms with the adopted design guidance. On this basis, it is concluded that the proposed vehicular access strategy via Milford Road offered 'safe and suitable access' and was agreed upon with SCC.

4.3 Sustainable Transport

4.3.1 The site is considered to have good sustainable transport credentials, reflected in the fact that the Highway Authority raised no issue in this regard within their consultee comments. The TA provided a review of the non-car accessibility of the development. In summary, this section confirmed that good pedestrian infrastructure already exists near the site, including footways and various crossing points on Milford Road along with several existing Public Rights of Way. It is also within walking distance of several local amenities such as food stores and Schools.

There are also several cycle routes near the site, including ‘The Rise’ immediately opposite the site which forms part of an advisory cycle route towards Brocton and Cannock Chase. Similarly, Bodmin Avenue located circa 200 metres to the west of the site forms part of National Cycle Network Route 5 which provides cycle access to Stafford Town Centre located approximately 5 kilometres away (circa 18 minutes cycle).

4.3.2 The TA also concludes that “a variety of bus stops can be found on Milford Road within ten minutes’ walk from the approximate centre of the site.” The report confirms that these bus stops are served by several bus routes, which mostly operate at hourly frequencies throughout the week and on weekends. For example, Route Number 826 (operated by Chaserider) connects the site to Stafford, Rugeley and Lichfield at an hourly frequency from Monday to Saturday. Whilst no claim is made that the site is within 400 metres of the nearest bus stop, **Image 18** below confirms that a majority of the development would be within this distance from the relocated bus stop on Milford Road or outside of Walton Village Hall (using Green Gore Lane).



4.3.3 The above image suggests that any residents in the northern section of the development would be required to walk over 400 metres to access the bus stops along Milford Road. Considering that this section borders an existing railway line it

is likely that a large area will need to be used as a buffer zone and landscaped. Nevertheless, it is considered that provision of an internal bus route should be explored as part of any future assessment. This would not require any changes to the proposed access layout, as guidance within Manual for Streets outlines that *“streets on bus routes should not generally be less than 6 metres wide”*. Another alternative option is to offer further contributions to improve the existing bus stops on Milford Lane, this could include the provision of Real-Time Passenger information or an upgrade to a sheltered arrangement to better serve future residents.

4.3.4 The site is also located within 5 kilometres of Stafford Railway Station which could be accessed by an 18-minute cycle journey. The station is operated by Avanti West Coast and provides over 200 cycle parking spaces which are sheltered and secured by CCTV. It operates several daily services connecting to key destinations such as Birmingham New Street, London Euston, Manchester Piccadilly and Liverpool Lime Street.

4.4 Traffic Generation and Highway Capacity

4.4.1 For robustness, the TA outlines that the assessment of development traffic is based on a scheme of up to 250 dwellings (noting the actual proposals were for up to 225 dwellings). This confirmed that the development could generate 144 two-way vehicular trips during the morning peak hour and 158 two-way trips during the evening peak hour. Whilst the additional 25 dwellings should help equate to the traffic generated by the small 250sqm convenience store, it is considered that the traffic generation calculations present the ‘worst-case scenario’ situation in terms of the impact of the development.

4.4.2 Junction modelling was completed for six junctions, including the site access on Milford Road and five other off-site junctions. This was agreed upon with SCC and unlike the land at Ash Flats Lane site, also requested that the assessments were based on a 2019 scenario (application plus 5) and a 2031 scenario (end of Local Plan period) both with and without development traffic. The TA outlined that *“the off-site junctions have been assessed on a ‘nil-detriment’ basis i.e. the highway*

conditions with the proposed development in place should be no worse than without the proposed development or should work within the acceptable threshold.”

4.4.3 It is important to note that the above position no longer represents policy guidance, instead, the NPPF document now requires *“any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost-effectively mitigated to an acceptable degree.”* It also states that *“development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”* On this basis, the development no longer requires a ‘nil-detriment’ scenario and instead should only warrant junction mitigation when there would be evidence of a ‘significant’ and ‘severe’ impact. This position was adopted within the Land at Ash Flats Lane TA in which several junctions were not considered to warrant mitigation based on the development traffic having a ‘negligible’ impact.

4.4.4 Despite the above, the modelling within the TA confirmed that the proposed site access junction would operate satisfactorily in both the 2019 and 2031 scenarios, having a maximum RFC of 0.36 during the morning peak hour and 0.19 during the evening peak hour. Similarly, the Milford Road right turn lane arm would also operate without any problems, having a maximum delay of 7.91 seconds during the 2031 evening peak hour scenario. Based on these results there should be confidence that the site access is suitable to serve the development and would continue to be able to do so even during the 2031 future year scenario. Not only will this help future-proof the junction, but it also ensures that it has plenty of spare capacity to accommodate any potential traffic increases along Milford Road in the future.

4.4.5 Out of the five other off-site junctions modelled, three were confirmed to already be experiencing capacity problems even without the development traffic. Even though the modelling suggested that the development traffic resulted in a negligible increase in RFC at these junctions, several improvements and contributions were put forward by the applicant to help offset any perceived negative ‘impact’ of the development. A summary of these is provided below:

- Main Road A513/Brocton Road Mini-Roundabout (circa 2 kilometres east of the site) – Widening of the A513 (E) entry width to 5 metres to improve junction capacity in all scenarios. This would require the removal of the existing central island which is considered to be redundant given there are no footways on the southern side of the carriageway.
- Weeping Cross A513/A34/Baswich Lane Double Mini Roundabout (circa 1 kilometre west of the site) – It was considered appropriate to offer a fair, reasonable and proportional contribution by the developer towards an SCC-led congestion reduction scheme at this location or sustainable travel infrastructure. A potential scheme was also explored which involved the replacement of the existing double mini roundabout with a 28 metres ICD roundabout which helped significantly reduce delays and queuing. A potential signalised junction scheme was also discussed as an option for SCC to explore in further detail.
- Queensville Roundabout (circa 2 kilometres west of the site) - It was considered appropriate to offer a fair, reasonable and proportional contribution by the developer towards an SCC congestion reduction scheme at this location or sustainable travel infrastructure. A potential scheme was also explored which included kerb realignments and a signalised junction which was subject to further investigation by SCC.

4.4.6 What is clear from the above is that the TA explored opportunities to improve any off-site junction even when they operated with an existing capacity problem. Furthermore, even when the impact of the development traffic was considered to be negligible, the developer offered several reasonable contributions towards SCC-led improvement schemes or investments into sustainable travel infrastructure. This is the complete opposite of the stance presented in the Land at Ash Flats Lane TA in which no off-site improvements or contributions were offered even at several off-site junctions that also showed signs of capacity problems before the development came forward.

4.4.7 Considering SCC's specific concern regarding the Weeping Cross junctions in which third-party land would be required to deliver any substantial improvement scheme, an initial review of the modelling results has been completed in light of the

latest policy guidance outlined earlier in this section. The table below was presented within the TA and confirms that the development traffic would result in a maximum increase of 35 PCUs during the 2019 evening peak hour. This equates to an increase of approximately one PCU every two minutes as a result of the development and in the grand scheme of things represents a 0.54% increase compared to the existing traffic flows at the junction. The potential decrease in flows shown during the morning peak hour is explained due to the sensitives in the Strategic Model from which the flows were provided by SCC, whereby model route choice assumptions reduce the anticipated along the A513 which is likely to be due to vehicles avoiding the junction due to the existing delays.

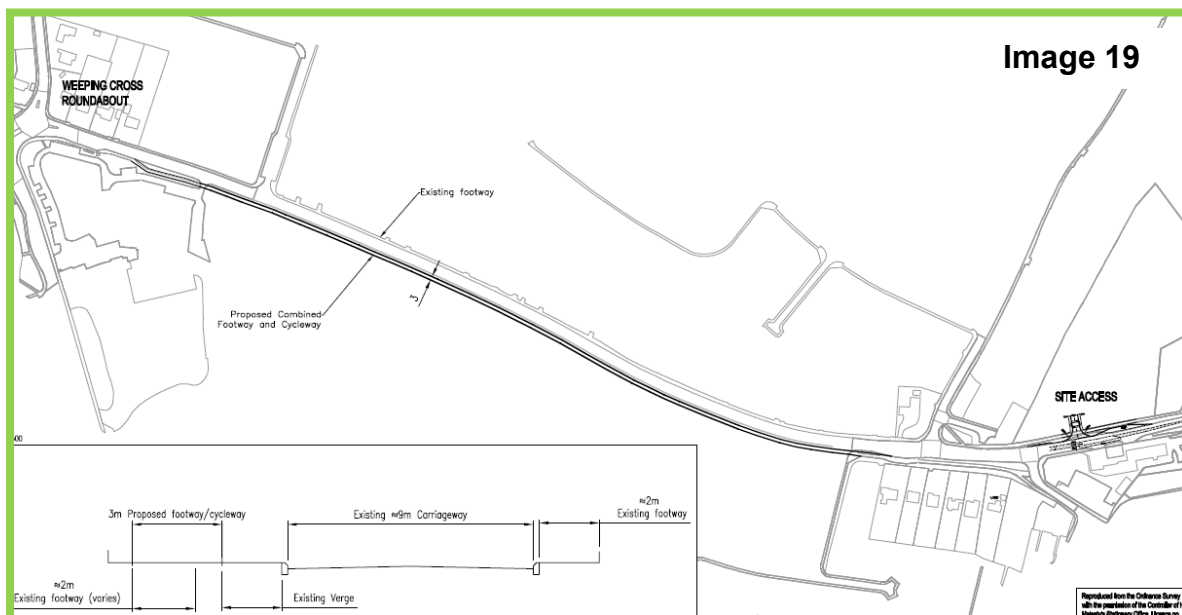
Table 6.5: A513 / A34 / Baswich Lane Double Mini-Roundabout Junction – 2019 and 2031 – Anticipated Change in flows as a result of Walton Garden Village development

Year / Peak	Do-Nothing Flows (PCU)	Change in Flows (PCU)	Change in Flows (%)
2019 / AM	6501	-36	-1.48%
2019 / PM	6544	+35	+0.54%
2031 / AM	6422	-47	-0.73%
2031 / PM	6555	+25	+0.38%

4.4.8 Based on the above, it is considered that an increase of only 0.54% as a result of the proposed development compared to the forecasted ‘existing’ traffic conditions does not represent a ‘significant’ or ‘severe’ impact. On this basis, it is considered that SCC would now struggle to defend its current position that mitigation is required at this off-site junction in accordance with overarching national policy guidance within the NPPF. Furthermore, it is considered unreasonable to expect the developer to be required to solely mitigate this junction when there is clearly already a capacity problem occurring which SCC are aware of.

4.4.9 Notwithstanding the above, even when SCC confirmed that the potential improvement scheme would require third-party land to be deliverable, the developer offered an alternative solution which aimed to offer improvements to the sustainable transport infrastructure near the roundabout. This was achieved through the provision of a potential improvement scheme along the southern edge of Milford

Road. As shown in **Image 19** below, the developer was willing to fund a 3 metres wide shared footway/cycleway for a distance of approximately 750 metres from the Hillcroft Avenue junction to the Weeping Cross roundabout. Given that this would represent a significant improvement for the existing residents near the site and help promote sustainable transport modes rather than the use of a private vehicle, it is considered to be surprising that SCC did not accept this as a solution at the time of the application.



4.5 Latest Proposals

4.5.1 It is understood that the applicant is now exploring the possibility of providing up to 370 dwellings at the site rather than the 225 dwellings previously proposed. Using the trip rates included within the submitted TA, a scheme of this size could potentially generate up to 213 two-way vehicular trips during the morning peak hour and 234 two-way trips during the evening peak hour. When this is compared against the previous assessment which was based on up to 250 dwellings, the latest proposals represent a potential increase of up to 69 two-way trips during the morning peak hour and 76 two-way trips during the evening peak hour (circa 1 additional vehicle trip per minute in either direction during both peak hours). This level of increase is not considered to represent a material change in traffic compared to what was previously assessed and due to this, the conclusions reached regarding the impact of the development are not anticipated to change. Importantly, this relates to the fact that when the proposed development is

compared to the forecasted 'existing' traffic conditions within the study area, it is still unlikely to represent a 'significant' or 'severe' impact at any of the off-site junctions identified above.

4.5.2 The submitted TA also confirms that the proposed access arrangement works comfortably within capacity and there is no evidence to suggest that this position would change if the development were increased to up to 370 dwellings. On this basis, there should be no reason for the potential larger scheme to alter the access layout currently being proposed. Furthermore, there is no reason to suggest that a single point of access could not continue to serve a larger scheme. This is reflected in the Manual for Streets, with Paragraph 6.7.3 stating that whilst normally *“the number of dwellings have been used by local authorities as criteria for limiting the size of a development served by a single access”*, it is important to note that *“the fire services adopt a less numbers-driven approach and consider each application based on a risk assessment for the site, and response time requirements.”* Because of this, it is considered that the suitability of a single point of access to serve the larger scheme should be led by the Fire Authority.

4.5.3 The above points are subject to further detailed assessment and agreements with the Highway Authority in support of any future planning application for a larger scheme. However, this initial assessment should give comfort that there are no obvious reasons why the development of up to 370 dwellings could not be delivered at the site.

4.6 Summary and Conclusions

4.6.1 Based on the appraisal above, it is considered that the development was previously withdrawn with only one sole outstanding highway point that was in the process of being resolved. This related to the impact at one off-site junction and whether land owned by the Police Authority could be used to deliver a significant betterment to a junction that had existing problems. Even if this were an issue, an improvement scheme was offered which would significantly benefit both existing and future sustainable transport users by providing a shared footway/cycleway along the edge of Milford Road.

4.6.2 It has also been confirmed that the proposed site access is safe and suitable both in terms of geometry and capacity. This is demonstrated by the fact that it requires no third-party land to be deliverable and that it has been tested in a '2031 future year scenario' with no indication of any significant delays or queuing. The development also has good access to sustainable transport modes with the opportunity to explore further improvements in the future. Similarly, the development would also offer a variety of improvements and financial contributions at several off-site junctions and not just along Milford Road.

4.6.3 On this basis, it is considered that the Milford Road site should be included as a preferred option within the Local Plan with the potential to deliver up to 370 dwellings.

5.0 SUMMARY AND CONCLUSIONS

- 5.1 Bancroft Consulting were appointed by Hallam Land Management to provide highways and transport advice in respect of a residential development on land at Milford Road in Stafford. This report has been prepared in response to the ‘Stafford Borough Local Plan 2020 – 2040 Preferred Options’ document which is currently subject to consultation until 12 December 2022.
- 5.2 The objective of this Traffic and Transport Appraisal has been to provide a high-level assessment of the site and ultimately outline why it should be allocated within any future Local Plan.
- 5.3 The report has also reviewed the transport credentials of two other sites; ‘Land at Ash Flats Lane’ and ‘Meecebrook Garden Community’ which have been identified and assessed because of concerns about their deliverability despite being included in the document.

Land at Ash Flats Lane

- 5.4 Based on this report it has been confirmed that the sole access to the site is subject to third-party land in order to be deliverable. Given that there are no other options for where access could be provided as an alternative, it has been concluded that without an agreement in place for the purchase of Lawford House, the development is simply not guaranteed.
- 5.5 Furthermore, there are serious doubts over the suitability of the access layout. This is confirmed by the modelling results presented in the TA which outline that there would be significant delays even when assessed on a ‘2016 future year scenario’ Given the Local Plan period covers 2020 to 2040, any junction would likely need to be significantly larger, and either be a roundabout or signalised junction. This would require major changes to the existing network and is unlikely to be deliverable due to third-party land and the nearby railway bridge.

- 5.6 Because of this, it has been concluded that if a planning application were to come forward for the development as currently proposed it would be refused for the reasons above. On this basis, it is not considered to be suitable to include as a preferred option for the Local Plan.

Meecebrook Garden Community

- 5.7 Based on this report it has been confirmed that even at this very early stage, several concerns should be considered before any decision is made to include the development within the Local Plan. Most notably this is regarding the true sustainability of the development and the improvements needed to ensure that future residents do not rely on the use of a car. It is considered that the focus to date is solely on how sustainability can be maximised within the site boundary and no assessment has been completed on how the site will be integrated into the wider area. Given that the majority of surrounding roads are rural with no footways or streetlighting, major strategic improvements will be needed to offer realistic connections from the development to the existing villages surrounding the site. Not only will this urbanise what is currently a very rural location but will also be subject to third-party agreements to be deliverable.
- 5.8 Not only will the surrounding area be ‘urbanised,’ but nearby villages will also be impacted by thousands of new vehicular trips to and from the site. To accommodate this increase in traffic major strategic highway improvements will be needed, including new junction layouts, increased carriageway widths and potentially even a new junction to the M6 Motorway. It is considered that no precise impact of the assessment of the development has been undertaken or confirmation if the traffic could realistically be accommodated.
- 5.9 Given the level of work that is required before a planning application could be submitted, it is considered that the possibility of even beginning construction is at least 5 years away. This is considered to be a low estimate when noting the significant amount of third-party land required which will require complex negotiations. Furthermore, on the understanding that realistically approximately 100 to 200 dwellings could be built a year due to commercial timescales for

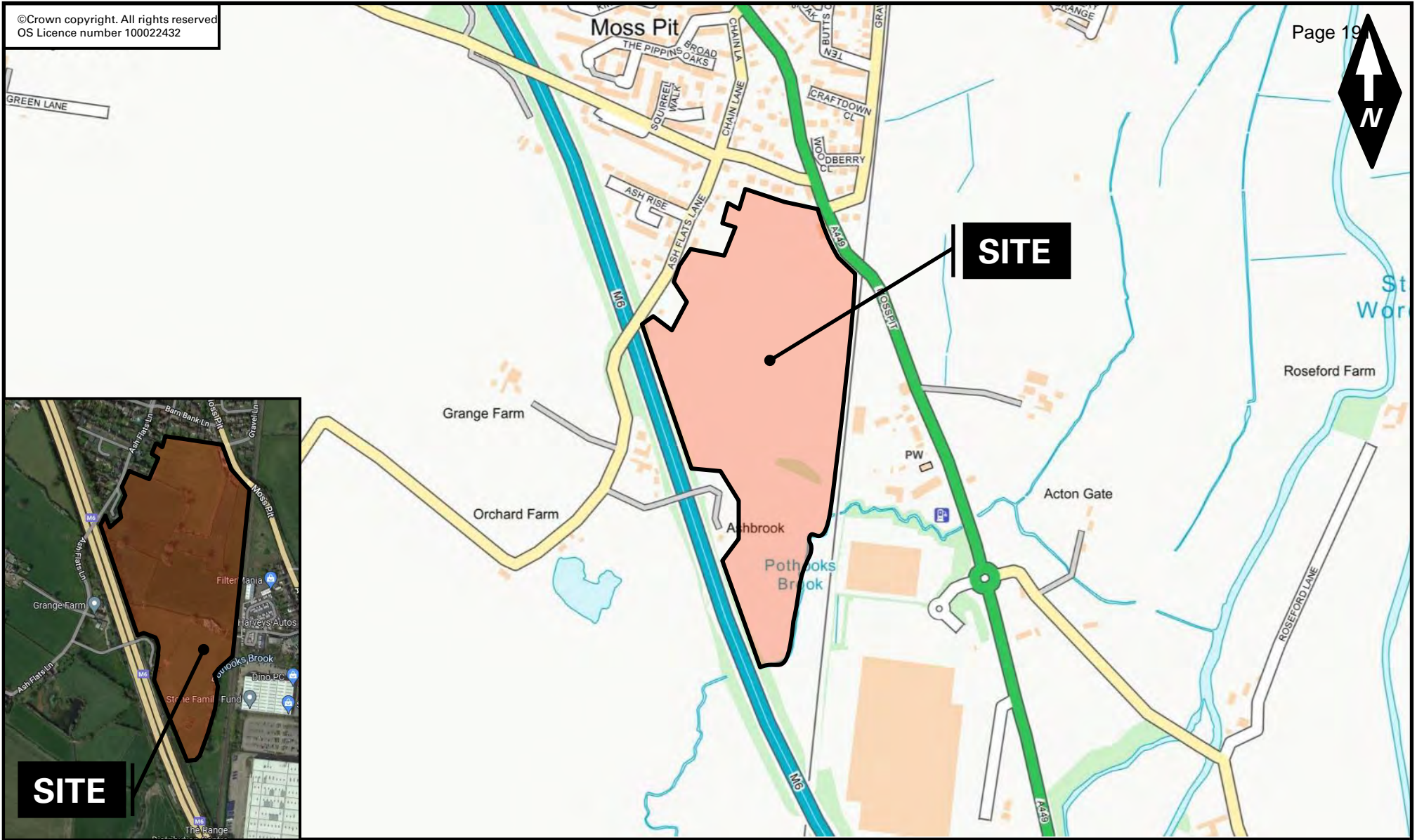
housebuilders, the delivery of up to 3,000 dwellings could take anywhere between 15 to 30 years to complete. This does not include the construction of the railway station, healthcare centre, indoor sports facility or schools. The ability to deliver a development that is not 'ad hoc' or 'piecemeal' is therefore considered to be unrealistic.

- 5.10 On this basis, it is considered that this development should not be preferred over more realistic and deliverable schemes within any future Local Plan.

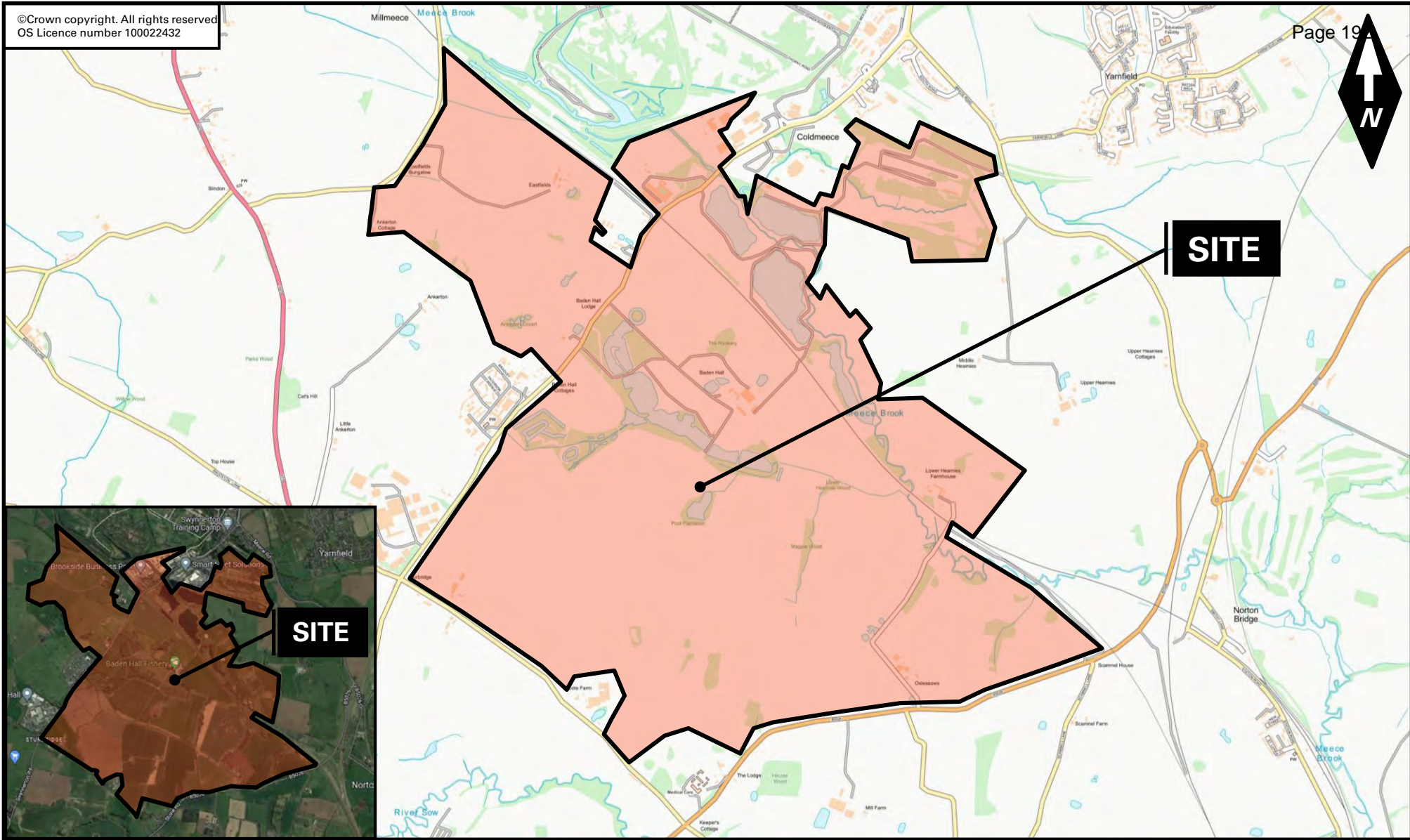
Milford Road Site

- 5.11 Based on this report, it has been established that the development was previously withdrawn with one sole outstanding highway point that was in the process of being resolved. This related to the impact at one off-site junction and whether land owned by the Police Authority could be used to deliver a significant betterment to a junction that had existing problems. Even if this were an issue, an improvement scheme was offered that would significantly benefit both existing and future sustainable transport users by providing a shared footway/cycleway along the edge of Milford Road.
- 5.12 It has also been confirmed that the proposed site access is safe and suitable both in terms of geometry and capacity. This is demonstrated by the fact that it requires no third-party land to be deliverable and that it has been tested in a '2031 future year scenario' with no indication of any significant delays or queuing. The development also has good access to sustainable transport modes with the opportunity to explore further improvements in the future. Similarly, the development would also offer a variety of improvements and financial contributions at several off-site junctions.
- 5.13 An initial assessment has also been completed regarding the latest proposals to deliver up to 370 dwellings at the site. This has suggested that there are no obvious reasons why the development of up to 370 dwellings could not be delivered at the site.

- 5.14 On this basis, Stafford Borough Council should be able to reconsider its position and include the Milford Road site as a preferred option for the Local Plan.



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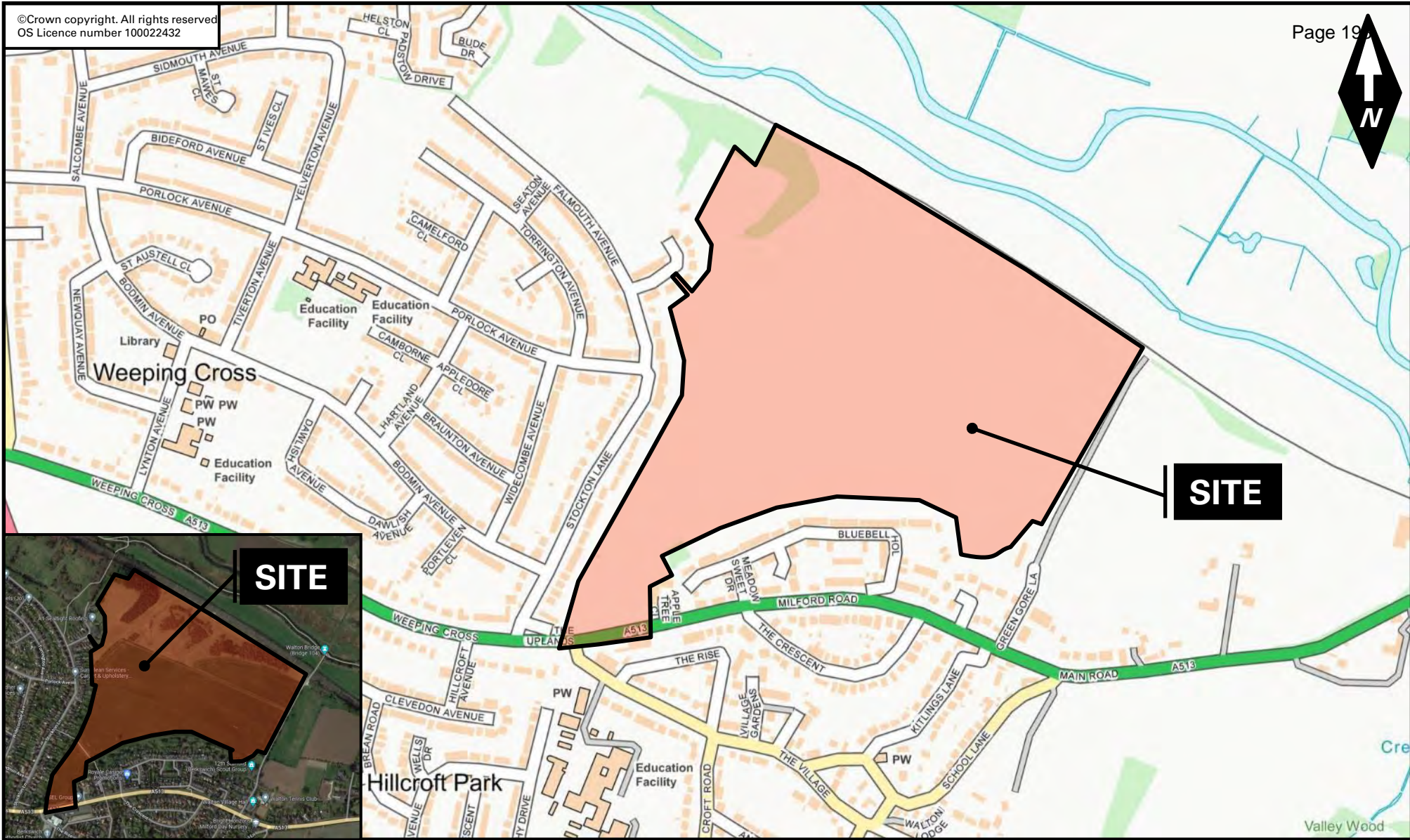


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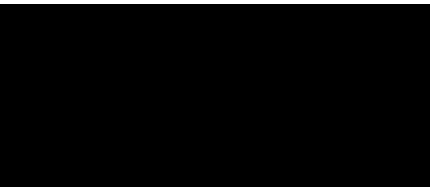
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TITLE:	DETAILED SITE LOCATION PLAN

JOB TITLE:	NEW GARDEN VILLAGE, MEECEBROOK
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 BANCROFT CONSULTING	
JOB NUMBER:	F22171
FIGURE:	2



SCALE: Do Not Scale	CLIENT: HALLAM LAND MANAGEMENT	JOB TITLE: MILFORD ROAD		
DATE: 14.11.22	TITLE: DETAILED SITE LOCATION PLAN		JOB NUMBER: F22171	FIGURE: 3
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APPENDIX 3 – ECOLOGY AND BIODIVERSITY TECHNICAL NOTE

FPCR Environment and Design Ltd

Land North of Milford Road – Ecology and Biodiversity Technical Note

- 1.1 The following note has been provided by FPCR Environment and Design Ltd. on behalf of Hallam Land Management Ltd. to provide summary information relating to the biodiversity interest of a Site known as Land North of Milford Road, Stafford. The Site is proposed for residential development.
- 1.2 The Site comprised an area of land extending to around 28.8 ha centred at National Grid Reference SJ 95642151, bound by an area of residential housing and the A513 (Milford Road) to the south, Green Gore Lane to the east, a railway line, oriented east/west to the north, and an area of residential housing and greenspace to the west. The Site comprised predominantly agricultural land with a small stand of plantation woodland in the north-west and semi-improved grassland and scattered areas of dense scrub in the north of the Site.
- 1.3 The proposed development considered in this technical note is based upon an illustrative masterplan produced by Nineteen47 Chartered Planners and Urban Designers on behalf of Hallam Land Management (Ref n2015-006 dated 30/11/2022). The plan provides for residential homes (including streets and private gardens) as well potential complimentary local facilities and potential location for a care home. The built development will be located in the south-western, western, and central areas of the Site, whilst the remainder of the Site will include retained habitats and newly created greenspace in the northern and eastern areas.
- 1.4 It is considered that the Site has an overall ecological value at the Local level, with the majority of the ecological interest of the Site existing in the northern area which will be retained. The southern area of the Site is occupied by agricultural land use and has negligible ecological value, with only small areas of marginal habitat which would be considered to be of Site level ecological value.
- 1.5 The proposed development has the potential to improve upon the existing ecological value of the Site, increasing biodiversity, the range of habitats, and connectivity of habitats which would in turn benefit a range of wildlife.

Existing Information

- 1.6 An online data search of publicly available biological records and information was undertaken as part of this assessment in November 2022, this was also supplemented by existing data for the local area which was received as part of an earlier desk study (2013). This information is used to provide contextual information.

Designated Sites

- 1.7 The Site does not support any statutory designations for nature conservation interest, with the closest being Baswich Meadows Site of Special Scientific Interest (SSSI), located approximately 500m north-west of the Site and designated for unimproved semi-natural grassland habitats with transitional wetland species and is important for breeding wading birds.
- 1.8 Cannock Chase Special Area of Conservation (SAC) and SSSI is located approximately 1.45km south-east of the Site covering ~1,250ha of land and is designated as a SAC (Reference UK0030107) for extensive dry heath habitats (listed as Annex I habitats in the European Habitats Directive), with Northern Atlantic Wet Heaths also present as a qualifying feature. In addition, the area is designated as a SSSI as an area of relict ancient forest/chase of national importance supporting a diverse area of semi-natural vegetation types as well as breeding herds of fallow deer *Dama dama*, a nationally significant population of nightjar *Caprimulgus europaeus*, and also designated for previously supporting red squirrel *Sciurus vulgaris*.
- 1.9 A Habitat Regulations Assessment (HRA) – Recreational Effects report was produced by FPCR in July 2014 to support a HRA Screening process for an outline planning application for the Site comprising 225 dwellings plus associated gardens, access roads, infrastructure, open spaces, play areas and areas enhanced for biodiversity. The report considered the likely significant effects to the Cannock Chase SAC. Potential effects from the proposed development of the Site included disturbance (damage and erosion) caused by increased visitor pressure, and increased air pollution

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on communities associated with the SAC. This report only assessed the potential impacts of increased visitor pressure and stated that the proposed development at the Site would account for only 0.7% of the annual visits and recreational pressure on Cannock Chase. The provision of greenspace and recreational facilities within the Site and wider area were also reported to reduce the potential impact. Overall, the report concluded that recreational pressure from the development (either alone or in combination with other schemes) would not result in a significant effect upon the SAC.

- 1.10 FPCR did not have access to any previous reports which assess the potential impacts on Cannock Chase SAC from increased air pollution.
- 1.11 Pasturefields Salt Marsh is located 4.4km north-east of the Site and is also designated as a SSSI and SAC (Reference UK0012789) and covers approximately 8ha of land. The primary reason for designation as an SAC is the presence of the Annex I habitat inland salt meadow and is the only remaining example of a natural salt spring with inland saltmarsh vegetation in the UK. The habitats provide a valuable site for wading birds such as snipe, redshank, and lapwing.
- 1.12 The Plan for Stafford Borough includes policies N5 and N6 which relate to development in respect to designated sites. Policy N5 states that the highest level of protection will be given to European Sites and provides additional policy on mitigation of effects to European sites including local and diffuse air pollution. Only developments that contribute no significant effects to European sites will be permitted unless measures to mitigate those adverse effects are provided which result in no significant effect to the European site.
- 1.13 Policy N6 specifically relates to Cannock Chase SAC and states that any development that leads to a net increase in dwellings within 15km of the site must take all necessary steps to avoid or mitigate any adverse effects on the SAC's integrity. The policy states: *"To ensure the Cannock Chase SAC is not harmed, all development that leads to a net increase in dwellings within 15km of the site, as shown on the Policies Map, must take all necessary steps to avoid or mitigate any adverse effects upon the SAC's integrity. This may include contributions to habitat management, access management and visitor infrastructure, publicity, education and awareness raising; provision of additional recreation space within development sites where they can be accommodated and, where they cannot, by contributions to off site alternative recreation space; and measure to encourage sustainable travel. The effective avoidance and/or mitigation of any identified adverse effects must be demonstrated to the Council as the Competent Authority, and secured by means of a suitable mechanism (e.g. Legal agreement) prior to approval of the development."*
- 1.14 In addition, Rawbones Meadow SSSI is located approximately 2km north-east of the Site but is beyond the River Sow and the Staffordshire and Worcestershire Canal. The SSSI is designated for important habitats of species rich rush pastures. The subject Site is located within the Impact Risk Zone (IRZ) of both Baswich Meadows and Rawbones Meadow and indicated that housing developments of more than 50 homes would require comment from Natural England.
- 1.15 There is one non-statutory designated site within 1km of the Site, this is named "North west of Milford" with site reference 92-62-30 and is summarised as *"An area of marsh near river fed by spring with emergent vegetation"*. It is further described as *"A very small circular depression within a semi-improved field about one kilometre east of Baswich. Although the fields have a very poor species diversity within them there is still the occasional musk thistle present. The depression is fed by an underground pipe and is mainly dominated by reed sweet-grass and hairy willowherb. Some goat willows have also become established within the marsh and cover about one third of it. In the central area of the depression where it is wettest, there are a small amount of reedmace. Within the marsh vegetation are also small amounts of other common wetland species such as gipsywort, soft rush, water figwort, water mint and tufted forget-me-not. There is also quite a lot of nettles within the depression possibly indicating eutrophic conditions. The pool is situated close to the River Sow and is therefore not an isolated wetland site"*.

Records of Protected and Notable Species

- 1.16 There are records of five protected/notable bird species within the Site, red kite *Milvus milvus*, redwing *Turdus iliacus*, fieldfare *Turdus pilaris*, hobby *Falco subbuteo*, and barn owl *Tyto alba*. No records of protected mammals, amphibians or reptiles were returned for the Site.
- 1.17 Additional protected/notable bird species within 1km of the Site include brambling *Fringilla montifringilla*, Cetti's warbler *Cettia cetti*, common crossbill *Loxia curvirostra*, golden plover *Pluvialis*

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apricaria, green sandpiper *Tringa ochropus*, greylag goose *Anser anser*, kingfisher *Alcedo atthis*, little egret *Egretta garzetta*, peregrine falcon *Falco peregrinus*, and woodlark *Lullula arborea*. A number of further bird species which are of principal importance (Schedule 41 of NERC Act 2006) were also recorded within 1km of the Site.

- 1.18 No records for protected reptiles or amphibians were returned within 1km of the Site. A search of the Multi-Agency Geographical Information for the Countryside (MAGIC) database did not return any records for great crested newt *Triturus cristatus* (GCN) license returns or European Protected Species License applications for GCN within 1km of the Site.
- 1.19 A reptile survey was undertaken by FPCR in 2014, seven survey visits were undertaken between March and June, no reptiles were observed on any of the survey visits.
- 1.20 There were a number of records of badger *Meles meles* within close proximity of the Site (exact locations are confidential for badger records).
- 1.21 European otter *Lutra lutra*, was recorded at four locations near to the Staffordshire and Worcestershire canal within 1km of the Site. There are four records of polecat *Mustela putorius* within 1km of the Site, all within residential garden areas. There are many records of European hedgehog *Erinaceus europaeus* within 1km of the Site, mainly associated with residential gardens. There are two records of harvest mouse *Micromys minutus* within 1km, one approximately 45m north of the Site. Although there are records of brown hare *Lepus europaeus* within 1km all of these are north of the River Sow.
- 1.22 Bat species were recorded in two main locations within 1km of the Site, a small number of records of common pipistrelle *Pipistrellus*, Noctule *Nyctalus noctula*, and an unidentified Myotis bat species located 250m north-west of the Site in an area of habitat similar to the northern part of the Site with a mosaic of grassland and scrub. The second area is 580m west of the Site and has records of common pipistrelle, soprano pipistrelle *Pipistrellus pygmaeus*, Noctule, Serotine bat *Eptesicus serotinus* and an unidentified Myotis species, associated with a residential area. There is one isolated record of a Whiskered bat *Myotis mystacinus* approximately 350m south of the Site. There are also seven additional isolated records of common pipistrelle within 1km of the Site.
- 1.23 There is one record of American mink *Neovison vison*, a non-native invasive species, located approximately 640m north-east of the Site.

Baseline

- 1.24 Previous ecological survey took place at the Site in 2016 and 2013 with a walkover survey undertaken on 24th November 2022 to update the information from previous surveys. The survey was conducted broadly following the Extended Phase 1 Habitat Survey Methodology (JNCC, 2007) with a systematic walk over of the Site (where access was possible) to classify the habitat types present and marking them on a base map. Target notes were used to record features or habitats of particular interest, as well as any sightings or evidence of protected or notable species.
- 1.25 In general, the Site remained relatively unchanged from the findings of the 2016 survey.
- 1.26 Botanical and habitat surveys may be undertaken at any time of year; however, the optimal period is between April and September. It is acknowledged that the November 2022 survey was conducted outside of the optimal period and that some floral species may not have been present at this time of year. When assessed in conjunction with the previous 2016 and 2013 surveys it is considered that there is ample information to inform an ecological assessment of the habitats and species at the Site.

Habitats

- 1.27 The Site comprises three large agricultural fields located in the south and central areas of the Site with an area of grassland, scrub, and a stand of plantation woodland in the north.
- 1.28 At the time of the survey the agricultural fields were all planted with a crop of *Brassica oleracea*. Boundaries consisted of post-and-wire fences or hedges with large gaps dominated by hawthorn *Crataegus monogyna* or overgrown by bramble *Rubus fruticosus* agg. with ground flora of frequent common nettle *Urtica dioica* and occasional cleavers *Galium aparine*. The margins of the fields were relatively narrow, 1m wide or less, with frequent cock's-foot *Dactylis glomerata*, nettle, and bramble, occasional false oat-grass *Arrhenatherum elatius*, cleavers, white dead-nettle *Lamium album*, and

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Yorkshire-fog *Holcus lanatus*. Rarely encountered in the margins were white campion *Silene latifolia*, cow parsley *Anthriscus sylvestris*, and spear thistle *Cirsium vulgare*.

- 1.29 An L-shaped stand of plantation coniferous woodland (approximately 1.1ha) was located in the north-west of the Site, this area was not accessed due to being fenced but was assessed visually from the fence line. The woodland was dominated by Scot's Pine *Pinus sylvestris*, with only rare specimens of mature pedunculate oak *Quercus robur* (one of which was noted to be standing deadwood), and silver birch *Betula pendula*. There was no established understorey, however occasional specimens of shrubby elder *Sambucus nigra* were observed. Ground flora was dominated by bracken *Pteridium aquilinum* and where not present the ground was generally bare.
- 1.30 In the north of the Site the majority of the area comprised semi-improved grassland with evidence of heavy grazing by livestock. The topography of this area was undulating and there were local changes in specific species, but the overall habitat was that of poor semi-improved grassland. It should be noted that a small area of this habitat was noted to include acid grassland indicator species in 2016 (See Target Note 1), during the 2022 survey acid indicators were not observed but this may be due to the timing of the survey.
- 1.31 In general, the grassland comprised a short sward (less than 5cm) with occasional tussocks and locally longer sward areas. Grasses included frequent common bent *Agrostis capillaris*, and red fescue *Festuca rubra* with occasional perennial rye-grass *Lolium perenne*, crested dog's-tail *Cynosurus cristatus* and Yorkshire-fog. Herbs included occasional red clover *Trifolium pratense*, dandelion *Taraxacum officinale*, and selfheal *Prunella vulgaris*. With rarely encountered (but locally frequent) common mouse-ear *Cerastium fontanum*, creeping buttercup *Ranunculus repens*, and hedgerow crane's-bill *Geranium pyrenaicum*, and common ragwort *Jacobaea vulgaris*. In the areas of longer swards Yorkshire-fog was more frequent with occasional cock's-foot. Herbs in the longer swards included occasional common nettle, broad-leaved dock *Rumex obtusifolius*, welbed thistle *Carduus crispus*, and common ragwort.
- 1.32 Within the north-west of the Site was a small area of marshy grassland/wet flush associated with the outfall of a field drain. In this area the grassland was seen to comprise of abundant soft-rush *Juncus effusus* and Yorkshire-fog, with locally frequent brooklime *Veronica beccabunga*, and occasional broad-leaved dock, and rarely encountered common nettle, common ragwort, and marsh thistle *Cirsium palustre*.
- 1.33 Within the grassland area in the north of the Site were stands of dense scrub with abundant gorse *Ulex europaeus*, and frequent bramble. Occasionally encountered were broom *Cytisus scoparius*, and elder. Ground flora was generally sparse or a continuation of the adjacent grassland but common nettle and foxglove *Digitalis purpurea* were also occasionally present and a small locally abundant stand of dead rosebay willowherb *Chamerion angustifolium*.
- 1.34 Mature individual oak trees were noted across the Site, some of which were interspersed among the areas of scrub, and two trees were located within the arable fields in the central/south-west of the Site.
- 1.35 In the south-west of the Site a line of Lombardy poplar *Populus nigra (italica)* was noted to be present on the southern Site boundary. With a tall hedge/line of Leyland cypress *Cupressus x leylandii* on the western site boundary. Two individual Leyland cypress were located on-site within a small area of unmanaged semi-improved grassland and scrub in the south-west of the Site. The scrub area was dominated by bramble and nettle whilst the grassland area was not publicly accessible therefore was not accessed during the 2022 survey and only observed from a distance.
- 1.36 The western Site boundary adjacent to residential gardens with fencing or ornamental hedges, occasionally with ornamental trees. Due to access restrictions these hedges and trees were not inspected during the 2022 survey.
- 1.37 A small stand of yellow bamboo *Phyllostachys aurea* approximately 4-5m tall, was observed adjacent to the north-western Site boundary (See Target Note 2) and is likely to have encroached onto the Site from the adjacent garden. Yellow bamboo is relatively slow growing but may grow to over 6m tall. This species is non-native but is not listed in Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) therefore there is no legal requirement to control the species. However, as good practice non-native species should be controlled or maintained to prevent further spread.
- 1.38 The largest of the arable fields was noted to have hedgerows on the northern boundary. H1 was noted to be a hedge with a large gap between the hedge and eastern Site boundary, terminating at a large gap (25m) bridged by a fence. The hedge was noted to be around 3m in height and up to 2m wide but with a high canopy and occasional small gaps. It was dominated by hawthorn with only occasional

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elder and dog-rose *Rosa canina*. Ground flora was sparse being only bramble, nettle, and cleavers or else a continuation of the grassland arable field margin. H2 continued the northern boundary of the arable field to the east of the fenced gap and was a similar composition to H1 but in places up to 4m high and occasionally overgrown by bramble. H3 likely was once managed as a hedgerow but without recent management had grown into a line of mature hawthorn and elder trees up to 6m in height with large gaps and ground flora comprising abundant bramble and frequent nettles.

- 1.39 None of the hedgerows were species rich or would be classified as 'important' under the Hedgerow Regulations 1997.

Target Notes

- Target Note 1 (TN1): Area previously mapped as semi-improved acid grassland.
- Target Note 2 (TN2): Small stand of non-native yellow bamboo.

Fauna

- 1.40 Habitats within the Site were suitable to support badger, however, no evidence of this species (including the presence of setts, latrines, hairs, prints, and snuffle holes) was observed on-site or within 30m (where accessible). In addition, no evidence of badger was reported during the 2016 survey.
- 1.41 The Site was within 150m of the River Sow and 80m from the Staffordshire and Worcestershire Canal, therefore there is a potential (albeit low) for otter to use the Site, however no evidence of otter was noted during the survey.
- 1.42 There were records of polecat in the residential area to the south of the Site. Rabbits are a major food source for polecats and the northern area of the Site was noted to have evidence of use by rabbit including rabbit burrows in the scrub areas. There is potential for polecats to use the northern area of the Site for hunting and they could potentially make dens in the woodland or scrub areas. Polecat are a species of principal importance under Section 41 of the NERC Act 2006 and are afforded partial protection under the Wildlife and Countryside Act 1981 (as amended) which prohibits certain methods of killing or taking this species.
- 1.43 Twelve trees were observed with bat roost potential, all of which were mature pedunculate oaks with multiple defects including cracks, broken limbs, knot holes and lifted bark. One oak, T11 within the plantation woodland, appeared to be standing deadwood. All of the trees were considered to have moderate bat roost potential.
- 1.44 The arable area in the south of the Site was not considered to be optimal for bat foraging and lacked features that might be used for bat commuting. The northern area with woodland, grassland and scrub would provide a mosaic of habitats suitable for bats foraging and could be used for commuting bats, particularly travelling from the north-east or north-west along the course of the River Sow or the Staffordshire and Worcestershire Canal.
- 1.45 Terrestrial habitats within the north of the Site would be suitable to support amphibians, though there are no waterbodies on-site and limited opportunities to breed within the Site and the immediate vicinity. The Staffordshire and Worcestershire Canal was 80m north of the Site and is in connectivity with the River Sow and is therefore likely to support fish, and has a low likelihood of supporting common amphibians and unlikely to support great crested newt. Two ponds were located within 500m of the Site, both of which were beyond the canal (a barrier to GCN dispersal) and are within the floodplain of the River Sow so are likely to support fish, therefore are unlikely to support GCN. It is considered highly unlikely that the Site supports GCN, though the small marshy flush area has the potential to support widespread amphibians e.g. common toad *Bufo bufo* and frog *Rana temporaria*.
- 1.46 The habitats in the north of the Site would be suitable to support common and widespread reptile species, whilst the adjacent railway line and canal would provide commuting opportunity for reptiles (particularly grass snake *Natrix helvetica*) to disperse to or from the Site. No reptiles were encountered during the 2014 reptile survey and as such it is considered that only very low numbers of (if any) reptiles would be expected to be present at the Site or within the immediate vicinity.
- 1.47 During the survey only a small number of birds were observed, these included great tit *Parus major*, blackbird *Turdus merula*, house sparrow *Passer domesticus*, magpie *Pica*, carrion crow *Corvus corone* and robin *Erithacus rubecula*. In 2016 starling *Sturnus vulgaris* and kestrel *Falco tinnunculus* were noted on-site and a grey heron *Ardea cinerea* was observed commuting over the Site.

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- 1.48 A wintering bird survey was undertaken in 2013 and identified 26 species including two birds listed on Schedule 1 of the Wildlife and Countryside Act 1981 (as amended) and red listed, fieldfare and redwing. A further three red listed and six amber listed species were also recorded. The remaining species being green listed. Four of the species encountered were also species of principal importance (Section 41 NERC Act 2006). The assemblages observed were noted to be small and likely only occasional visitors.
- 1.49 The habitats on-site, particularly in the northern area, provided foraging habitat for a range of birds. The woodland, scrub, hedgerows, and individual trees provided potential nesting and breeding habitat whilst the arable fields provide limited foraging opportunity for birds due to the lack of diversity.

Biodiversity Net Gain (BNG)

- 1.50 Biodiversity Net Gain (BNG) is “an approach to development that leaves biodiversity in a better state than before”. When applying biodiversity net gain principles, developers are encouraged to bring forward schemes that provide an overall increase in natural habitat and ecological features. The aim of BNG is to minimise losses of biodiversity and help to restore ecological networks.
- 1.51 Biodiversity Net Gain is already part of the National Planning Policy Framework (e.g. NPPF, Para 170(d) and Para 175(d)) but the NPPF does not specify a number/percentage for the gain. The Environment Act 2021 includes the requirement for future developments to provide an at least 10% gain to be secured for a minimum of 30 years. Delivery of BNG may be on site, off-site or undertaken using statutory biodiversity credits. This will only come into force once the secondary legislation is in place to support this requirement. Emerging policy within the Borough (Local Plan 2020-20240 Biodiversity Topic Paper (Preferred Options Stage), and Biodiversity and Development Supplementary Planning Development Document 2020) suggest that 10% net gain will be adopted into the Local Plan 2020-2040 and is likely to be requested.
- 1.52 The proposals do not affect any high value or irreplaceable habitats and the scope of the illustrative masterplan provides the opportunity to secure enhancements for the Site through retention, and potential restoration or enhancement of the existing woodland, grassland as well as significant habitat creation. Any planning application would be supported by a Biodiversity Impact Assessment (BIA) using an approved metric such as the DEFRA 3.1 metric to ensure that development of the site has the capability to deliver a measurable net gain in line with the national and local policy context.

Summary and Conclusions

- 1.53 The Site is within 2km of Cannock Chase SAC, SSSI. Previous assessment considered the impact of increased recreational pressure due to the proposed development to be negligible. The impact from increased traffic on habitats at the SAC is likely to be minimal. According to Stafford Borough Council’s Planning guidance to mitigate the impact of New residential development on Cannock Chase Special area of conservation (SAC) (April 2022) developments within 15km of the SAC and which may cause adverse impact may undergo a Habitats Regulations Assessment and provide appropriate mitigation for adverse effects, or the developer may enter into a financial agreement to provide contributions towards Strategic Access Management and Monitoring Measures (SAMMS) within the SAC.
- 1.54 The scheme of habitat retention and creation at the Site is intended to assist in mitigating potential effects of increased recreational use of Cannock Chase SAC and habitat creation will reflect those habitats present within the SAC area. However, it is considered that a financial contribution to provide additional mitigation would likely be required.
- 1.55 Pasturefields saltmarsh SAC, SSSI is 4.4km north-east of the Site. Pasturefields is open access but has no parking for visitors and no visitor facilities. It is considered unlikely that the proposed development would contribute to any significant effects given the distance and restrictions to accessing this site.
- 1.56 Baswich Meadows SSSI is within 1km of the Site and Rawbones Meadows SSSI is 2km distant from the Site. It is considered likely that potential impacts to these Sites could be easily negated as part of the detailed assessment for the proposed development.
- 1.57 There is one non-statutory designated site within 1km which is isolated within a semi-improved field and beyond both the Staffordshire and Worcestershire Canal and the River Sow. As such, it is

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considered unlikely that there would be any significant impact to non-statutory designated sites from the proposed development.

- 1.58 The illustrative masterplan for the proposed development shows the site to be around 28.8ha in total and that the footprint of the built area (approximately 10.8ha) will be located entirely within the area that is currently used for arable agriculture and is considered to be low ecological value and sensitivity. Approximately 9.1ha of habitat, predominately in the north of the Site, will be retained. Approximately 8.9ha of new habitat will be created, the majority of created habitats will replace existing low ecological value agricultural land with higher value woodland, grassland, and waterbodies (attenuation ponds and SUDS features).
- 1.59 Retained areas of habitat have the potential to be enhanced through management (e.g. reducing the intensity of grazing, seeding grasslands, managing the woodland to produce a more diverse ground flora and variation of structure within the habitat) additional features could be provided to support wildlife (e.g. habitat piles and refugia features, bird boxes and bat boxes on retained trees or potentially within the design of buildings). The masterplan shows that all identified mature individual trees with bat potential will be retained. Therefore, no impacts to bat species are anticipated. The proposed development plans include a wider variety of habitats including wetland habitats which would greatly increase the foraging opportunities for the local bat population.
- 1.60 Only two individual broadleaved trees (unidentified due to access restrictions), two individual Leyland cypress and the line of Leyland cypress located in the south-west of the Site will be lost. The loss of these trees is considered not considered to be significant beyond the Site level. Furthermore, there will be additional planting of individual trees, woodland, an orchard, and street trees. These features will compensate for the loss of trees due to the development and contribute towards biodiversity and provide habitat for foraging, commuting, and nesting/breeding for a range of wildlife.
- 1.61 Further assessment of habitat condition and calculation of biodiversity units would be required prior to development to ascertain whether Biodiversity Net Gain would be achievable. However, given the extent of habitat retention and habitat creation within areas of low ecological value it is considered likely that at least 10% BNG would be achieved, as well as significant gains in hedgerow units.
- 1.62 As all mature trees with bat potential will be retained potential impacts to bat roosts will be avoided and the impact on local bat populations will be negligible. The proposed habitat creation will provide additional resources for bats and their prey species, improving the opportunity for bats to forage within the area of the Site. No bat activity surveys have been carried out and further survey would be required to determine the level of activity at the Site. The provision of a scheme of bat boxes would also provide additional roosting opportunities. Overall, the proposed development would provide long term benefits to the local bat population likely to be of minor significant positive effect.
- 1.63 Habitat creation within the proposed development would provide additional habitat suitable for mammals, which could potentially include polecat, otter and badger which have been recorded in the vicinity.
- 1.64 It is considered highly unlikely that great crested newts are located on-site or would migrate onto the Site due to lack of records in the wider area, barriers to dispersal in the vicinity (canal, river, A513 main road), and lack of suitable breeding GCN habitat. However, the proposed habitat creation, particularly attenuation ponds and SUDS features, would provide opportunities for more widespread and common amphibians to colonise the Site providing minor positive significant effects for local amphibian species.
- 1.65 Habitats at the Site are suitable for reptiles (though presence has not been confirmed) and there is connectivity to further suitable habitats via the adjacent railway line and canal. Given the proposals for habitat retention and creation the extent of suitable habitat for reptiles within the Site would increase, likely to lead to minor significant positive effect on the local reptile population.
- 1.66 The Site provides opportunities for birds to forage, nest, and breed, with the northern area being most diverse in habitats. The arable fields are of lower diversity but may provide some opportunity for foraging and potentially nesting for ground nesting birds. The assemblages of birds and records for the Site show mainly common and widespread species use the Site, although a small number of Schedule 1, red listed and species of principal importance also use the Site. Overall, the scheme of habitat retention and creation would likely lead to minor significant positive effects for the majority of species using the Site with likely limited but moderate significant effects of species more specialised to farmland and ground-nesting due to loss of arable habitats.
- 1.67 It is considered that the Site has an overall ecological value at the Local level, though is not considered to be sufficiently diverse, or support any species or habitats of significance, that would meet the

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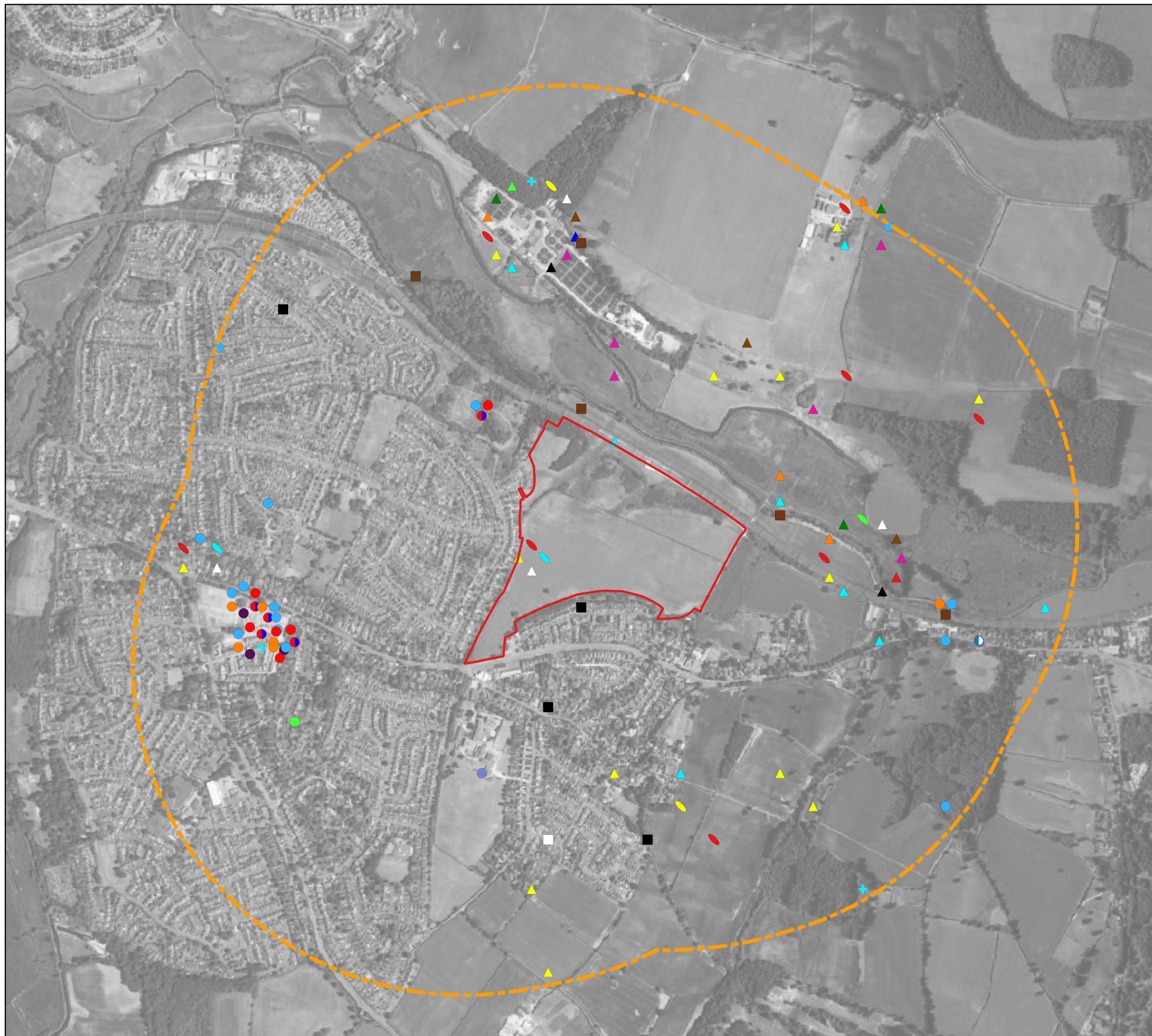
selection criteria for a Local Wildlife Site in Staffordshire. The majority of the ecological interest of the Site exists in the northern area, in the form of grassland, scrub, hedgerows and plantation woodland, which will be retained and has the potential to be enhanced under the proposed development.

- 1.68 The southern area of the Site is occupied by agricultural land use and has limited ecological value, with only small areas of marginal habitat which would be considered to be of Site level ecological value. The development of this area is not anticipated to have any significant ecological effects.
- 1.69 The area in the east of the Site which will subject to scheme of habitat creation will provide positive ecological effects at a Local level, by increasing the range of habitats (grassland, woodland, waterbodies and scrub/hedgerow), as well as increasing connectivity of existing habitats.
- 1.70 Although some relatively low ecological value habitat will be lost (predominantly arable land) the proposed scheme of habitat retention and creation will increase the biodiversity, the range of habitats, and connectivity of habitats at the Site, which will in turn benefit a range of local wildlife. Overall, the proposed development has the potential to improve upon the existing ecological value of the Site.

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Key

- Site Boundary
- 1km buffer

Birds

- | | |
|---|---|
| ▲ Barn Owl | △ Hobby |
| ▲ Brambling | ▲ Kingfisher |
| ▲ Cetti's Warbler | ▲ Little Egret |
| ▲ Common Crossbill | ▲ Merlin |
| ▲ Fieldfare | ▲ Peregrine |
| ▲ Golden Plover | ▲ Red Kite |
| ▲ Green Sandpiper | ▲ Redwing |
| ▲ Greylag Goose | ▲ Woodlark |

Bats

- | | |
|---|--|
| ● Bats | ● Serotine |
| ● Noctule Bat | ● Soprano Pipistrelle |
| ● Pipistrelle | ● Unidentified Myotis bat |
| ● Pipistrelle Bat species | ● Whiskered Bat |

Mammals

- | | |
|---|--|
| ■ European Otter | ■ Polecat |
| ■ Feral Ferret | |

Plants

- + Bluebell

client
Hallam Land Management

project
Milford Road,
Stafford

drawing title
CONSULTATION PLAN - SPECIES

scale
1:12,000

drawn
SAM

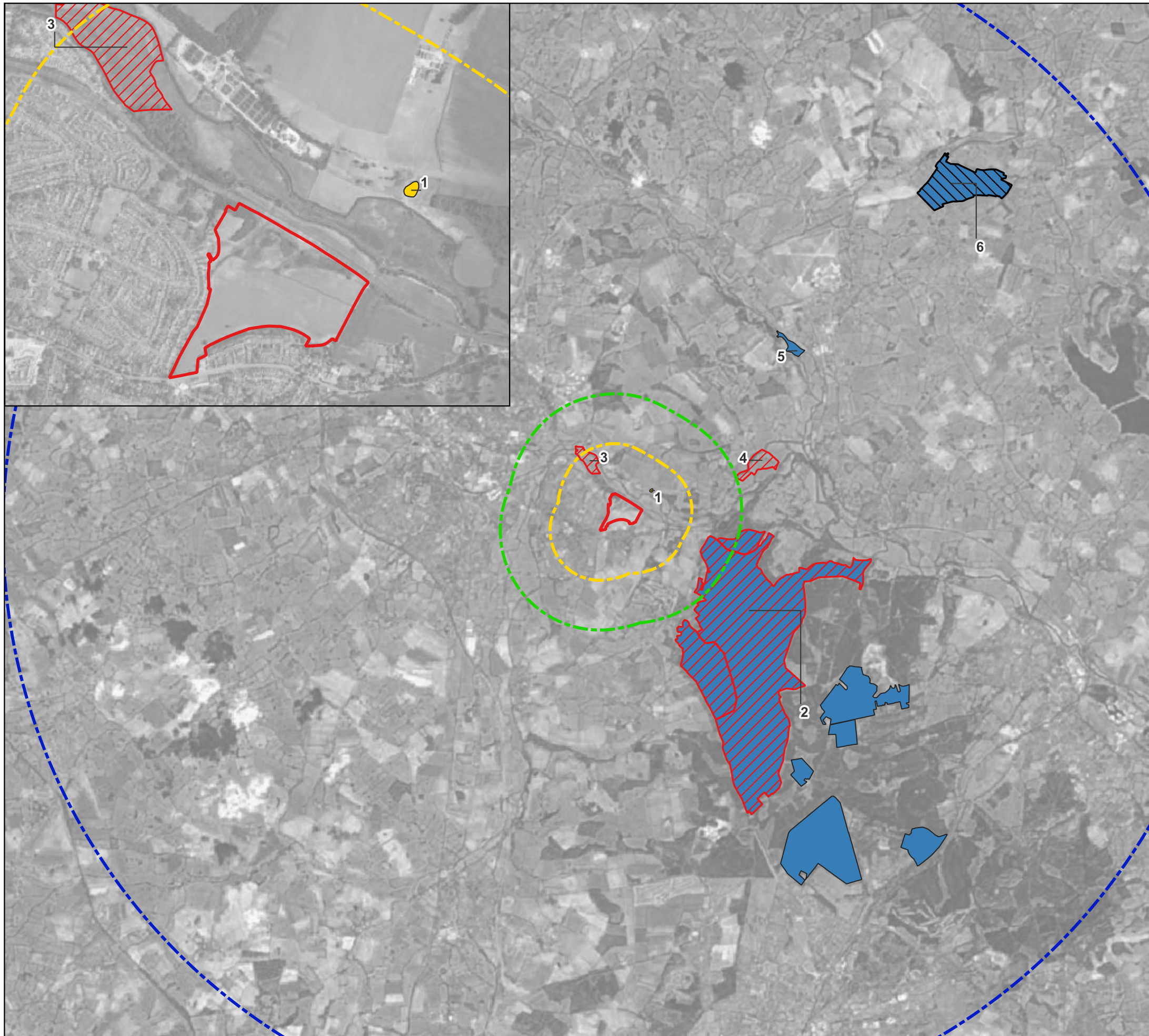
issue date
1/12/2022

drawing / figure number
Figure 1

rev
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Key

- Site Boundary
- 1km buffer
- 2km buffer
- 10km buffer
- Biodiversity Alert Site
- Site of Special Scientific Interest
- Ramsar site
- Special Area of Conservation

Label	Site Name	Designation(s)
1	92-62-30	BAS
2	Cannock Chase	SSSI, SAC
3	Baswich Meadows	SSSI
4	Rawbones Meadows	SSSI
5	Pasturefields Salt Marsh	SAC
6	West Midlands Mosses	SAC, Ramsar

client
Hallam Land Management

project
**Milford Road,
Stafford**

drawing title
CONSULTATION PLAN - DESIGNATED SITES

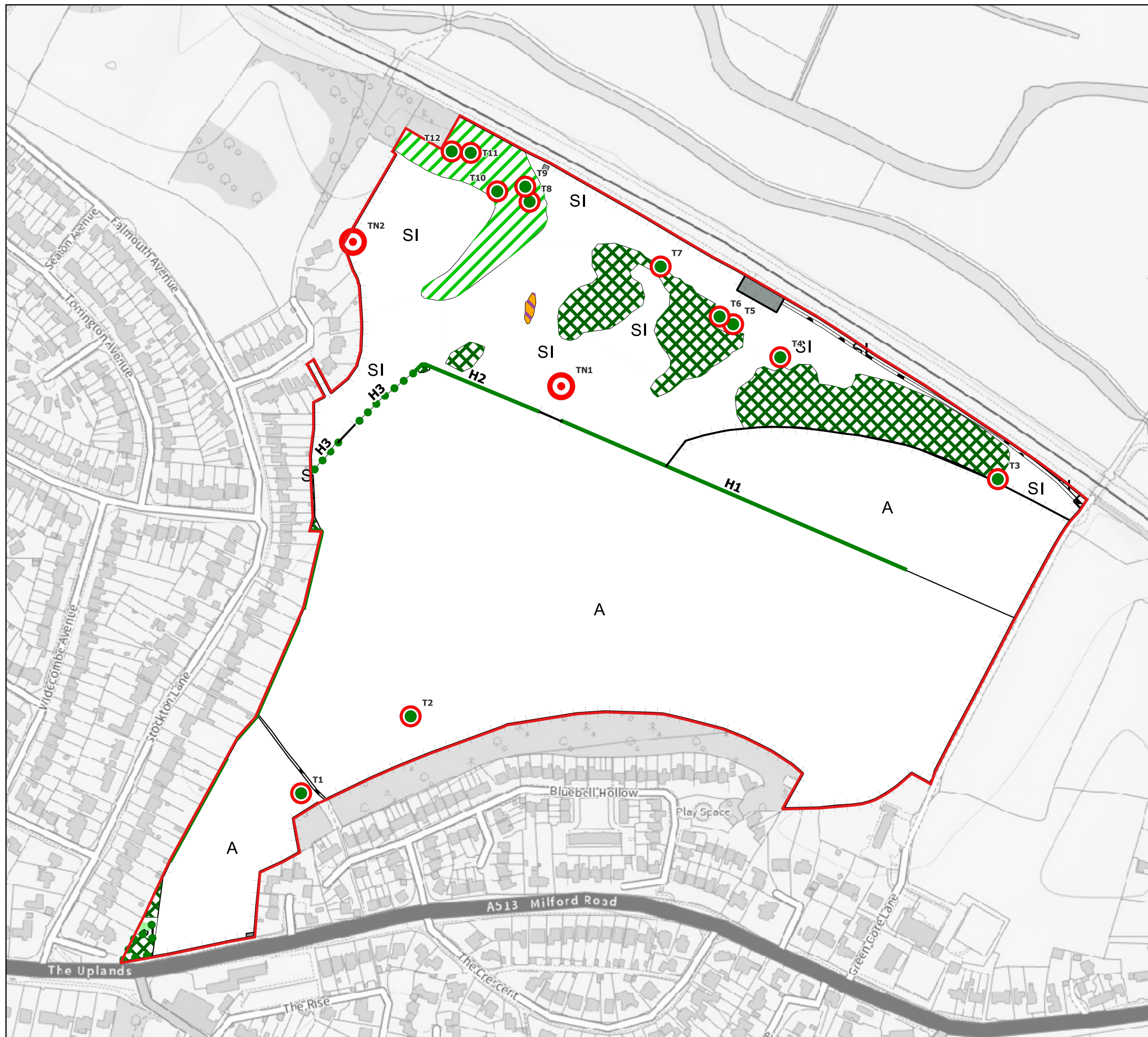
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Figure 2

drawn
SAM

issue date
1/12/2022

rev
-



Key

- Site Boundary
- Bare ground
- Built Environment: Buildings/hardstanding
- Coniferous woodland - plantation
- A Cultivated/disturbed land - arable
- Marsh/marshy grassland
- SI Poor semi-improved grassland
- Scrub - dense/continuous
- Broadleaved trees
- Intact hedge - species-poor
- Fence
- Tree with bat potential (with reference)
- Target note (with reference)
- Coniferous tree
- Broadleaved tree

client
Hallam Land Management

project
Land North of Milford Road,
Stafford

drawing title
PHASE 1 HABITAT PLAN

scale @ A3
1:3500

drawn
PRA

issue date
1/12/2022

drawing / figure number
Figure 3

rev
-

APPENDIX 4 – LANDSCAPE AND VISUAL NOTE



8th December 2022

LANDSCAPE & VISUAL NOTE

Land to north of Milford Road, Stafford

1.0 INTRODUCTION

- 1.1 This Landscape & Visual Note has been prepared by FPCR Environment & Design Ltd, on behalf of Hallam Land Management (HLM). The Note is in relation to land north of Milford Road, Stafford, i.e., the Site.
- 1.2 It is considered that the Site can successfully accommodate built development in the form of new housing without leading to any unacceptable landscape and visual harm. The Site is located alongside the existing built-up area to the west and south such that new development would form a logical extension of the residential area. Design and mitigation measures, which includes an extensive green infrastructure framework will integrate development into the landscape as well as delivering significant environmental benefits.
- 1.3 The Vision document and the Masterplan (produced by nineteen47) shows how well-planned development can be accommodated within this landscape.

2.0 SITE CONTEXT

Context

- 2.1 The main part of the Site and the adjacent built-up area of Weeping Cross (Stafford) occupies part of a plateau of higher land that sits above the Sow Valley that lies to the north of the Site.
- 2.2 The Site is contained by the A513 Milford Road and the settlement of Walton-on-the-Hill (Stafford) to the south and by the residential area of Weeping Cross (Stafford) to the west. The Trent Valley Line railway, the Staffordshire & Worcestershire Canal and the River Sow lie to the north within the valley bottom.
- 2.3 Walton-on-the-Hill is a hill-top village that has expanded with post war and modern residential properties. This includes 2 and 3 storey properties at Bluebell Hollow that back onto the Site to the south. Residential properties at Stockton Lane and Falmouth Avenue in Weeping Cross border the Site to the west.

Landscape Character & Visual Amenity

2.4 Summary:

- 1) The Site's landscape character is influenced by the urbanising elements of the surrounding built edge to the west and south.
- 2) The main part of the Site – that would contain built development -is a rather ordinary featureless arable field devoid of any significant vegetation or landscape features.
- 3) Aside from two oak trees that are covered by a Tree Preservation Order, and which can be suitably retained, landscape features are restricted to blocks of woodland and hedgerows on the Site's sloping fields to the north and east. These features (and the Site's valley slopes) are all retained by the Masterplan.
- 4) The Site is not designated for any landscape quality designation at either a national or local level. Although the Site lies close to the Cannock Chase AONB the site does not display any distinctive landscape characteristics of that landscape.
- 5) The vast majority of the Site is not publicly accessible.
- 6) Walton-on-the-Hill Conservation Area (CA) lies to the south with the intervening built up area lying between the CA and the Site.
- 7) There are localised close-range views of the Site from the adjacent residential edge (e.g., Stockton Lane and Falmouth Avenue) and from a short stretch of a Public Footpath.
- 8) Opportunities for views of the Site from the elevated hills of Cannock Chase to the east are limited in extent. Where there are views, these are distant with the Site forming a minor component of the much wider view observed within the context of the built-up area of Stafford (Walton-on-the-Hill and Weeping Cross) that is visible.

3.0 EVIDENCE BASE

Stafford Landscape Sensitivity Study, 2021

- 3.1 The Landscape Sensitivity Study concludes that the Site is of "*high-medium sensitivity*".
- 3.2 It is considered that Sites that are judged to be of high/medium sensitivity, or indeed high sensitivity, need not preclude well-designed development as various factors, to include masterplanning approaches and design and mitigation measures, need to be taken into account when determining impacts and consequential effects on the landscape. Indeed, regardless of the sensitivity, the Study sets out clear mitigation measures on how development could be accommodated within the Site.

"Mitigation: Restrict development to the south of the site, in line with existing surrounding development and away from the conservation area to the north. A landscape buffer should be provided on the northern edge of any built development to visually enclose the settlement edge. Existing habitats in the north of the site and the Public Right of Way in the south should be retained."

Stafford Borough Council, Local Plan 2020-2040 SHEELA (2022 UPDATE) Site Assessment Profiles

- 3.3 In Stafford Borough Council's SHEELA the site is referred to a BER04. Under the heading, "*Suitability Assessment*" there is *no* reference to any significant landscape and visual matters that would preclude or severely constrain development upon the Site.

Stafford Borough Council, Local Plan 2020-2040 Site Assessment Profiles (Preferred Options Stage), 2022

- 3.4 The report considers BER04. The topic area of "*Landscape*" is considered with the report stating that BER04 is of "*High / Medium overall landscape sensitivity*". The report goes on to conclude that the Site is a potential option for development and that areas of concern "*would need to be suitably mitigated*".

"Outcome of Assessment: Potential Site Option Reasoning: Education capacity constraints would need resolving, and ecology and landscape concerns would need to be suitably mitigated for"

4.0 MASTERPLAN

Vision Document & Masterplan

- 4.1 The accompanying Vision document demonstrate how the "*mitigation*" within the Landscape Sensitivity Study has been embedded within the Masterplan, such that development can be sensitively integrated into the landscape and built edge context.
- 1) Built Development is located "*to the south of the site*" and is away from the "*Conservation Area*". Development is located within the central field and is located alongside the existing built-up area.
 - 2) A substantial green infrastructure of planting and green space is proposed around the northern and eastern parts of the Site. This will create a "*landscape buffer around the northern edge*" of the Site.
 - 3) Along the northern part of the site "*existing habitats*" are retained and these can be enhanced with the provision of new habitats (woodland, trees, hedges and grassland) to provide landscape and biodiversity benefits
 - 4) The Public Footpath is "*retained*" as part of a wider network of new recreational routes, which include new circular paths.

5.0 CONCLUSION

- 5.1 The Masterplan prepared as part of the Vision document provides a masterplanning and placemaking approach for the Site.
- 5.2 The development would be located alongside the existing urban edge of Weeping Cross and Walton-on-the-Hill on the central plateau of the site, so that new housing on the Site would be seen as a logical urban extension of the built-up area. Built development would be located away from the northern and eastern slopes of the Site with this area being dedicated as a

substantial area of green infrastructure. This comprises reinforcing the Site's existing habitats with new woodland, trees and hedgerows on the edge of the plateau and on the site's slopes, as well as providing areas of grassland that can be managed for biodiversity benefits. This design approach would create a sympathetic interface between the settlement edge and the local landscape.

- 5.3 Through an analysis of landscape and visual resources, and a sensitively designed masterplan and a green infrastructure framework, it is considered that the Site and the local landscape is tolerant of change and has the capacity to absorb well-designed and well-planned development without resulting in any unacceptable long-term landscape and visual harm.

From: Hannah Race [REDACTED]
Sent: 12 December 2022 09:59
To: [REDACTED]
Cc: Strategic Planning Consultations; [REDACTED]
Subject: Stafford Borough Local Plan 2020-2040: Preferred Options - Representations and Vision Document

Hi [REDACTED]

Thank you for confirming that representations to the Stafford Borough Local Plan 2020-2040: Preferred Options may be submitted via email. I therefore submit the following documents via the WeTransfer link:

- [REDACTED]
- Representations on the Stafford Borough Local Plan 2020-2040 Preferred Options consultation, submitted on Behalf of the Malpass Brothers in relation to Land At Creswell Grove, Stafford.
 - Promotional 'Vision Document' prepared by Pegasus Group, promoting 'Land at Creswell Grove' for employment development, in both High and Low Resolution.
 - Transport Strategy Note prepared by Pegasus Group on behalf of Malpass Bros, in support the Vision Document.

Please could you provide confirmation of receipt of this email and documents.

Kind regards

Hannah

Hannah Race
Planner

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'PREFERRED OPTIONS' REGULATION 18 RESPONSE

**STAFFORD BOROUGH LOCAL PLAN 2020-2040
PREFERRED OPTIONS**

LAND AT CRESWELL GROVE, STAFFORD

Representations On Behalf of Malpass Bros

TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
PLANNING AND COMPULSORY PURCHASE ACT 2004

Date: December 2022 | Pegasus Ref: P20-3311

Author: David Onions



Document Management.

Version	Date	Author	Checked/ Approved by:	Reason for revision
1	09/12/22	HR/DO	DO	



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1. INTRODUCTION

- 1.1. These representations are made in response to the 'Preferred Options' (Regulation 18) consultation document and accompanying published evidence base for the Stafford Borough Local Plan 2020 – 2040 Preferred Options consultation. The representations are made by Pegasus Group on behalf of the Malpass Brothers and relate to their land interest at Creswell Grove (hereafter referred to as the "Site"), for which they are the sole owner. The Site is a greenfield site and is situated to the north west of Stafford, adjacent to the proposed settlement boundary of the settlement of Creswell as shown in the New Local Plan Preferred Options Borough Policy Map Stafford Area Inset.

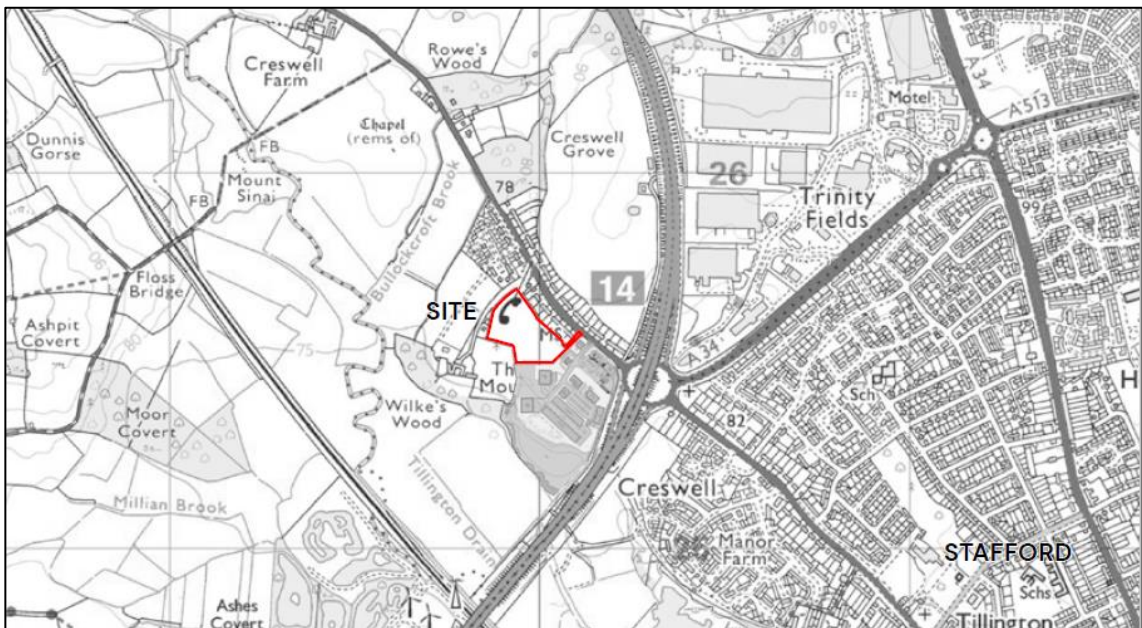


Figure 1 – Site Location Plan

- 1.2. With regards to the Site these representations should be read alongside the accompanying:
- Site Location Plan (**Appendix A**)
 - Vision Document – Employment Development (**Appendix B**)
 - Transport Strategy Note (Appendix C)
- 1.3. Representations promoting the site have previously been made to the Borough Council following the Call for Sites process, with the Site at the time being promoted for residential development. These 'call for site' representations included the submission of a residential focussed Vision Document for the Site, setting out the opportunities and constraints alongside the locational merits of Creswell as a sustainable location for growth taking into account the recent development of Staffordgate immediately to the south east.
- 1.4. The Site was subsequently assessed in the Strategic Housing and Employment Land Availability Assessment (SHELAA) August 2022 Update under site reference CRE06 (Site Name: Land at Creswell Grove, Creswell, Stafford, ST18 9QT). Although assessed as available and achievable, the Site was regarded as not currently developable for residential



development due to its location neither within or adjacent to a defined settlement boundary, and therefore a review of the adopted Sustainable Settlement Hierarchy would be required to remove the constraint. This assessment was refined in the Site Assessment Profile's document where an issue was identified with regard to access to education.

1.5. Since the consideration of the site in the SHELAA, the opportunity to access the site directly from the Staffordgate development has come forward. In view of this and the proximity of the site to the strategic road network (M6 Junction 14) it has been concluded that the Site is better suited to commercial development. These representations and the accompanying Promotional Document set out how the allocation of the Site for employment purposes will deliver significant benefits and will constitute sustainable development.

1.6. These representations are framed in the context of the requirements of the Local Plan 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 the area's 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 this Framework.

1.7. These representations also give consideration to the legal and procedural requirements associated with the Plan making process.

1.8. Whilst the Malpass Brothers welcome and supports Stafford Borough Council's full update of the Borough's Local Plan, they raise concerns related to:

- The failure of the Local Plan to recognise the significance of the M6 and its function in supporting economic growth.
- The strategy to deliver new employment developed in Policy 1 has not been justified by the evidence base.
- The strategy for delivering economic growth relies on employment development in locations which are not employment suitable to meet current employment demand (e.g. for storage and distribution) or in locations which currently lack the necessary infrastructure.
- The reliance on new employment land at Meecebrook is ineffective as it is unlikely to contribute towards meeting the demand for employment land in the Local Plan period.

The Local Plan should allocate land at Creswell Grove for employment development.



2. BACKGROUND

- 2.1. The Stafford Borough Local Plan 2020-2040 is intended to replace the Plan for Stafford Borough (adopted June 2014) and the Plan for Stafford Borough – Part 2 (adopted January 2017).
- 2.2. In January 2018, following the initiation of the New Local Plan process in July 2017, the Council issued a Call for Sites, inviting landowners to put forward sites for potential development. The subsequent SHELAA document was published in December 2018. Since 2018, there have been three updates to the SHELAA, in 2019, 2021 and 2022.
- 2.3. In March 2021, a Vision Document was prepared on behalf of the Malpass Brothers and submitted for Land at Creswell, which promoted the Site for residential development. The Vision Document was provided to illustrate the potential of the Site to contribute towards meeting housing needs over the next plan period. The document provided an analysis of the Site and its locational context including any on or off-site constraints. Following this, development options for the site were demonstrated in an Illustrative Masterplan.
- 2.4. The Borough Council subsequently assessed the Site in the SHELAA Update (August 2022) under site reference CRE06. It was assessed as available and achievable, however as the site does not fall within a recognised Local Plan settlement, the Council concluded that it was not currently developable. To remove this constraint would require a review of the adopted Sustainable Settlement Hierarchy.
- 2.5. The Site had also been assessed by the Council in the Site Assessment Profiles (Preferred Options Stage) document. For a site to be included within the Site Assessment Profiles document, it must have passed stages 1 and 2 of the site assessment process and are now being assessed as to whether they are suitable for allocation in the Preferred Options. The Site was assessed in this document with a potential yield of 55 dwellings. The outcome of the assessment was rejection of the Site on the basis that education constraints are unlikely to be able to be resolved.
- 2.6. Subsequently the ability to access the site through the Staffordgate commercial development has come forward. As a result of this and the issues raised by the Council in the SHELAA update and in the Site Assessment Profile Document, Pegasus Group has conducted a review of the potential of the site for employment purposes. Following discussions between the Malpass Brothers, Pegasus Planning Team, Design Team and Transport Team, it was concluded that the Site would best support the Borough's growth strategy through employment development. Subsequently, the Site is promoted to Stafford Borough Council for employment development through these representations and the accompanying 'Vision Document'.



3. LOCAL PLAN REVIEW

- 3.1. In accordance with the requirements of Paragraph 33 of the National Planning Policy Framework ('NPPF') and under regulation 10A of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), Stafford Borough Council ('SBC') are currently undertaking a review of the adopted Local Plan. The adopted Local Plan currently comprises of two adopted documents:
- the Plan for Stafford Borough 2011-2031 adopted in June 2014 and
 - Part 2 of the Plan for Stafford Borough adopted in January 2017.
- 3.2. The emerging Local Plan is subject to a six-week period of public consultation, running between Monday 24th October 2022 and 12 noon on Monday 12 of December 2022. This marks the continuation of a proposed five-year process whereby SBC will review the policies of the existing Local Plan.
- 3.3. The current timetable for the Local Plan Review indicates that it is due to be submitted to the Secretary of State for examination by November 2023 and adopted in October 2024



4. REPRESENTATIONS ON THE LOCAL PLAN CONTEXT AND EVIDENCE BASE

Spatial Portrait of Stafford Borough

- 4.1. The spatial portrait for the Borough is outlined in the emerging Local Plan and provides context on the administrative area while identifying seven key challenges facing Stafford Borough. The portrait highlights the '*excellent transport links*' serving the Borough, notably the M6 motorway, West Coast Mainline rail and in future High Speed 2 (HS2). The relatively strong economy of Stafford Borough is also noted, with unemployment rates consistently lower than the national average.
- 4.2. It is identified that a challenge for the Plan is to support the continued strengthening of the local economy while continuing to meet housing needs. This recognition of the importance of supporting growth in the local economy is supported by the Malpass Brothers, however this challenge is not fully addressed within the Vision and Objectives. The implications of this are discussed fully below.
- 4.3. The challenge of acting on climate change is also addressed, responding to the climate emergency declared by Staffordshire County Council in July 2019 and the Stafford Borough Council Climate Change and Green Recovery Strategy 2020 – 2040 document.
- 4.4. Finally, the requirement to enhance access to services and reducing the need to travel is highlighted, with the challenge cited as needing to locate more significant development in those locations which are or can be made accessible by a range of transport modes.
- 4.5. Overall, the Malpass Brothers support the Spatial Portrait and Borough Context illustrated within the Emerging Local Plan, which highlights the Boroughs excellent transport links, including the M6, and the subsequent important economic linkages with both the West Midlands and north Staffordshire conurbations.

Transport Links

- 4.6. As noted throughout the emerging Local Plan, a large strength of Stafford Borough in terms of employment opportunities is its excellent strategic transport links and wider connectivity, notably the M6, and in particular, the connectivity to this network permitted by junction 14 of the M6. The recent works to improve junction 14 are also noted.
- 4.7. The evidence base supporting the new Local Plan, notably the Connections Topic Paper, notes that supporting and enhancing access to services is important for achieving sustainable development in the borough.
- 4.8. Within the Connections Topic Paper, three key transport challenges are identified:
 - Maximising access to services and reducing the need to travel
 - Ensuring that significant development is delivered in those locations which are, or can be made, accessible by a range of transport modes



- Decarbonising transport by increasing active travel and public transport use and moving to low or zero emission vehicles

4.9. Whilst noting the predominantly rural nature of the Borough, the spatial portrait does recognise the 'excellent transport links' that the Borough has, noting their role in important economic linkages. This access to the strategic road network is a clear benefit to the Borough, yet acknowledgement of this infrastructure and its importance to the delivery of growth is not fully realised within the Vision, nor within the 8 objectives. This represents a failure in the strategic objectives to recognise the key role infrastructure plays in supporting key business sectors such as those involved in storage and distribution. The locational advantages of identifying development opportunities close to roads on the strategic road network also links to the objective of minimising travel distances, particularly by HGVs. By allocating land close to the strategic road network will minimise the distance large vehicles have to travel on roads less suitable for them. It is therefore suggested that the locational advantages of Stafford are contextualised within the Plan, ensuring subsequent allocations make the best use of available infrastructure within the Borough.

4.10. Although the evidence base in relation to transport (the Connections Topic Paper) identifies opportunities, these appear to be contradictory. For example, it notes that the new garden community at Meecebrook has good transport connectivity opportunities, so *could* be highly sustainable. The Interim Sustainability Appraisal ("ISA") (Published October 2022) noted that while there is a need to introduce the two strategic development options within the Local Plan process (i.e. Stafford Station Gateway and Meecebrook), neither growth option can be taken as a 'given' for the purposes of the local plan, with other options remaining open for discussion (ISA p21).

Vision and Objectives

4.11. The amended vision and objectives are set out on page 12 of the Emerging Plan and are broadly supported; stating that the vision is of '*A prosperous and attractive borough with strong communities*'. However, Malpass Brothers comment that the Vision for the Borough is overly simplistic and leaves limited scope for measurement and quantifying success. As a result it requires further development.

4.12. The Objectives which support the delivery of the Vision are also generally supported, in particular the aim to ensure the Borough developed a high value, sustainable economy via infrastructure led growth. However, they lack a truly employment growth focussed objective which links back to the relative strengths that exist in the Borough such as good transport connectivity.

4.13. Objective 5 refers to the delivery of infrastructure led growth and this objective is supported. However, this must refer to both existing infrastructure and the provision of new infrastructure. The most sustainable option must be to utilise existing infrastructure to its full potential before creating more. The allocation of Land at Creswell Grove off M6 Junction 14 has the potential to make use of its location next to Junction 14 of the M6 and so would align with the vision and objectives in reducing the need to travel and therefore decreasing carbon emissions through shorter distances travelled, given its the direct access onto junction 14 of the M6.



Economic and Housing Development Needs Assessment (January 2020)

- 4.14. The Preferred Options Plan is supported by an Economic and Housing Development Needs Assessment (“EHDNA”) prepared by Lichfields and issued in January 2020. The overarching objective of the EHDNA is to identify future growth and local needs across Stafford Borough for the period 2020 to 2040 and to provide robust and up-to-date evidence upon which the new Local Plan is developed and so inform options for employment growth.

Employment

- 4.15. To establish the identified employment need over the Local Plan period, the analysis conducted for the EHDNA developed a number of potential economic scenarios to provide a framework for considering future economic growth needs and B-Class employment space requirements in the Borough up to 2040. A range of scenarios were modelled, including labour demand/projections of employment growth in the main B-Class sectors, consideration of past trends in completions of employment space, and estimating future growth of local labour supply based on the EHDNA’s housing requirements.
- 4.16. The 2020 EDHNA recognised that the commercial property market stakeholders had identified that the Borough’s excellent connectivity to the strategic road network was a key strength. It also emphasised there was a shortage of good quality B Class land and a need for greater choice in the market, with a scarcity of smaller units. The 2020 EDHNA emphasises that the allocation of employment land should take into account the views of the market and recommended that the Borough’s B-Class employment land requirement should range from 68 ha to 181 ha between 2020 and 2040.
- 4.17. However, the evidence base also shows that forecast employment land requirements are lower than past take-up. The Housing and Employment Land Topic Paper indicates that the Council intend to update the EHDNA in between the preferred options and submission stage to test and update the forecast employment growth and employment land requirements.
- 4.18. It will be important to ensure that any employment land identified in the emerging plan takes into consideration the views from the market and relative market strengths to ensure demand for employment land is catered for in the Local Plan capitalising on its identified strengths. This evidence must then inform the strategy to deliver employment growth in the locations most appropriate to meet demand.
- 4.19. The EHDNA found that gross take up of B Class land has been very high in recent years, at 10.98ha over the past 5 years, driven primarily by B8 storage and distribution. This is reflected by the predicted indicative split of employment land recommended in the report, which identifies that 75% of new employment land should be identified for B1c/B2/B8 uses and 25% office.
- 4.20. In terms of influences on the employment development strategy, the evidence base suggests that development should be directed to the larger settlements which are more sustainable. The approach to promote Stafford town centre as the main service centre to the Borough over the plan period (p27) is generally supported. However, other factors which influence the delivery of employment land must also be taken into account in the Local Plan strategy.



5. REPRESENTATIONS ON THE LOCAL PLAN POLICIES

Policy 1 – Development Strategy

- 5.1. Policy 1 confirms that in the period 2020 to 2040 provision will be made for 10,700 new homes (535 new homes each year); and at least 80 hectares of new employment land. The policy states that the Local Plan's strategy for employment development will be delivered through four main methods:
1. Redevelopment in Stafford, including the Stafford Station Gateway project and town centre transformation;
 2. Completion of the existing employment land commitments as detailed in Appendix 7;
 3. The development of the other employment site allocations under Policy 12; and
 4. The development by 2040 of 15ha of employment land at Meecebrook Garden Community as part of a larger allocation under Policy 7.
- 5.2. The amount of new employment development is based on the EHDNA's core projection for 2020–2040 employment growth in the Borough plus a 50% uplift to align with housing growth that is planned to be above baseline local housing needs. However, it is not clear from this statement how the Borough Council has evidenced the 80 ha figure as appropriate or justified. The 2020 EDHNA does not specify the 80 ha figure.
- 5.3. In addition to the lack of justification for the 80 ha of new employment land identified in Policy N1, the spatial distribution of new employment land as identified within subsection D does not reflect the evidence base nor does it respond to market signals. The vision and objectives of the Local Plan highlight issues such as infrastructure, reducing the need to travel and climate change yet there is no clear strategy in the Local Plan how these matters will inform the allocation of land for employment growth.
- 5.4. Furthermore, the distribution of employment land does not reflect the key attributes of the Borough as set out in the spatial portrait. In particular it fails to utilise existing infrastructure and the locational advantages that the Borough already possess such as access to the strategic road network (M6). The lack of a coherent strategy which demonstrates how the Local Plan vision and objections has been developed in conjunction with the evidence base to deliver sustainable employment growth via the allocations, potentially results in an ineffective Local Plan.
- 5.5. In addition, in terms of new employment land, reliance is placed on redevelopment in Stafford including the Stafford Station Gateway project and Town Centre transformation. These projects are likely to be predominantly office related development. They are located within the centre of the town and therefore not accessible to the strategic road network. The approach in this regard is highly aspirational as the evidence base including the EHNDA identified that there was less focus on office space in the Borough and that the stimulation of demand for higher quality offices is likely to be dependent on regeneration programmes. This does reflect market circumstances which are highlighted as being of significance in the EHNDA. In view of this conflict between market demand and the regenerational aspirations of the Borough Council, a greater range of employment allocations which can meet existing employment requirements, should be pursued. This position is emphasised in the EHNDA



which found that the take up of Class B land had been very high in recent years, driven primarily by Class B8 storage and distribution. Sites within central Stafford will not be making provision for storage and distribution uses.

- 5.6. The significance given to the Stafford Station Gateway Site in Policy 1 in delivering employment development is over emphasised. Whilst the approach to promote the Town Centre as the main service centre for the Borough and recognising its sustainable credentials is supported, the emphasis given to the Stafford Station Gateway Site is in terms of employment not justified.
- 5.7. The employment strategy also relies on the completion of existing commitments as detailed in Appendix 6 of the Local Plan document. These existing commitments amount to 90.32 ha. Some of these existing commitments have planning consents which are historic. There is therefore some doubt as to whether they will all come forward. In addition, many appear to be in rural locations which are unlikely to be the focus of market demand and which the evidence base has shown have not been developed quickly or at all. As a consequence, the reliance on historic employment commitments to deliver new employment growth within the Borough is considered unsound.
- 5.8. Furthermore, the strategy identifies that a substantial component of the new employment land allocation is proposed to be at Meecebrook Garden Community. It is clear that the Meecebrook Garden Community will require substantial amounts of infrastructure to allow it to come forward. This is highly likely to limit the potential of the employment site to contribute towards meeting new employment land requirements during the Plan period. In particular, the supporting evidence already recognises that the employment component is likely to come forward towards the end of the development cycle. This is due to the need for a substantial component of infrastructure to be provided to cater for the employment element and also the new housing development to provide a local workforce. In view of these circumstances, it is highly doubtful that a 15 ha of employment land identified for Meecebrook will be delivered within the Local Plan period.
- 5.9. In reality the allocation strategy allocates only two sites for new employment development which is likely to be suitable to meet market demand. This consists of land north of Redhill and land to the east of Ladfordfield. This provides for circa 37 ha of new employment land. Both sites would be suitable to meet provision within the B Class sector but in view of the overall requirement for employment land identified in the Local Plan, which in itself is queried in terms of its justification, is insufficient to deliver the economic growth envisaged including the associated housing requirement.
- 5.10. To address the shortcomings in the development strategy set out above additional land should be identified taking on board the key opportunities and advantages of the Borough. This would include proximity to the strategic road network including the M6. In addition a greater number of sites should be identified so as to address key elements of the EHNDA which emphasised that there was a shortage of good quality B Class land and a need for greater choice in the market. In addition it is clear that market demand has been very high in recent years for Class B land and this has been driven primarily by storage and distribution uses. The Development Strategy set out within Policy 1 should seek to address these key components of evidence and this would require additional employment land to be identified in key locations. In terms of the site at Creswell this would provide an ideal opportunity to utilise the existing strategic road infrastructure on a site that is immediately adjacent to an existing employment commitment (described as land south of Creswell Grove and subject



to planning permission 17/27028/OUT in Appendix 7 of the Local Plan). Such an allocation would align with the key vision and objectives of the Plan and also directly meet with the needs of the market which both look towards B Class development. This would clearly not only utilise existing infrastructure and be particularly attractive to those sectors requiring direct access to the strategic road network but also respond immediately to market demand.

Policy 7 – Meecebrook Site Allocation

- 5.11. The proposed employment strategy relies heavily on the development of Meecebrook, and this does not reflect/respond to the findings of the evidence base. The evidence shows that there has been a past poor uptake of rural sites and this raises concerns over the delivery of the employment land at Meecebrook.
- 5.12. Concern is raised as to both the soundness of the assumptions underlying the proposed trajectory of the housing delivery from the site during the plan period, and the implication that if Meecebrook is not brought forward, that the Borough would 'reassess' the quantum of unmet needs from neighbouring authorities that it would meet. This would therefore have implications on market demand to develop at the garden community, then too impacting negatively on the Borough's supply of employment land delivery. If the housing does not come forward, then there is a strong likelihood that the employment element would be redundant.
- 5.13. Sir Oliver Letwin's Independent Review of Build Out [rates] of large sites in 2018 (Final Report), concluded that for large sites, the average build-out rate was at 6.5%/year. At Meecebrook Garden Community, this would equate to just under a 200homes/year build out rate, for a 3,000-home scheme. The assumption of the Plan that the site would deliver at over 200 homes/year across the plan period is considered unsound with no robust justification. The reliance on the 15 ha of employment land coming forward at Meecebrook is therefore considered unsound and alternative sites should be allocated in the Local Plan.

Policy 11 – Stafford Station Gateway

- 5.14. Policy 11 allocates land for mixed use development in the centre of Stafford to provide mix of apartments and houses (circa 900 homes) together with offices and workspace. While the Malpass Brothers generally supports the redevelopment of this site and recognise the opportunity it brings, the EHDNA supporting the Local Plan indicated that in terms of the commercial property market, while the industrial and logistics sectors are considered to be performing well, there is less focus on office space, with town centre sites falling out of favour with businesses. The implications of the COVID-19 pandemic were also not factored into this assessment, and therefore citing this site as a location for office/work space this is potentially unsound and not fully justified.

Policy 12 – Other housing and employment land allocations

- 5.15. Outside of Stafford and the Garden Community proposal, the only settlements which are proposed to deliver employment are at Land to the east of Ladfordfields (SEI01) (5.6ha) and Land to the north of Redhill (CRE02) (31.15ha).
- 5.16. As set out previously the Creswell site is directly adjacent to another site allocated in the current adopted local plan and which forms part of the employment land supply set out in Appendix 7. It would in effect form an extension to the Staffordgate development. The supporting Vision Document demonstrates it can be developed to provide an extension to



the Staffordgate site which takes on board all the relevant development managed criteria. As a result, it should be included as an additional employment allocation in the policy.

Site Specific Issues

5.17. The Site (north west of Staffordgate) has clear attributes which make a strong case to bring it forward to deliver new employment development. These have already been outlined in the representations made to the Local Plan and also through the Vision Document. However, the following is particularly significant:

- The site is located immediately adjacent to Junction 14 of the M6. This provides it with direct access to the strategic highway network, which the Local Plan recognises is one of the Borough's key attributes.
- By virtue of its location the site is particularly suitable for distribution type uses or others which require close proximity to the strategic highway network.
- The proximity to the M6 Junction means that development on the site will reduce the amount of mileage HGVs and other vehicles would need to travel from the main road network. This aligns with key elements within the Local Plan including reducing the need to travel. Employment development at the site would reduce the need for HGVs in particular to utilise smaller scale roads which are less suitable for large vehicles.
- In particular this site would be suitable to either provide smaller units for which there is acknowledged market demand within the supporting evidence or alternatively a larger unit aimed at meeting the significant demand for new storage and distribution outlets.
- The site will utilise existing infrastructure in the form of the strategic road network but also the existing infrastructure developed on the Staffordgate site. The proposal constitutes a natural extension to that committed development.
- The site's location is situated between the Staffordgate development, which forms part of the Council's employment land commitments, and the newly established settlement boundary for Creswell. It represents a natural rounding off of the settlement whilst meeting a clear need for employment development.
- The site has been assessed from a transport and access perspective and found to be acceptable with the adjacent junction capable of accommodating the additional traffic associated with the proposal.
- Provision can be made for both pedestrians and cyclists in the design including direct access into the existing transport network, maximising the potential of employees to use sustainable modes of transport to work.
- The Masterplan establishes that there is clear opportunity to integrate a new employment development within the established character of the area whilst maintaining its landscape context and providing opportunities for linkages into the surrounding open countryside.



- The site can deliver sustainable urban drainage which can also be utilised for nature conservation/biodiversity enhancement.

5.18. Overall, the Vision Document has established that there is clear opportunity to deliver a suitable employment site which would be consistent with the overall objectives of the Local Plan to deliver sustainable employment development at the Creswell Grove Site, and this should be incorporated as an additional employment land allocation under Policy 12.

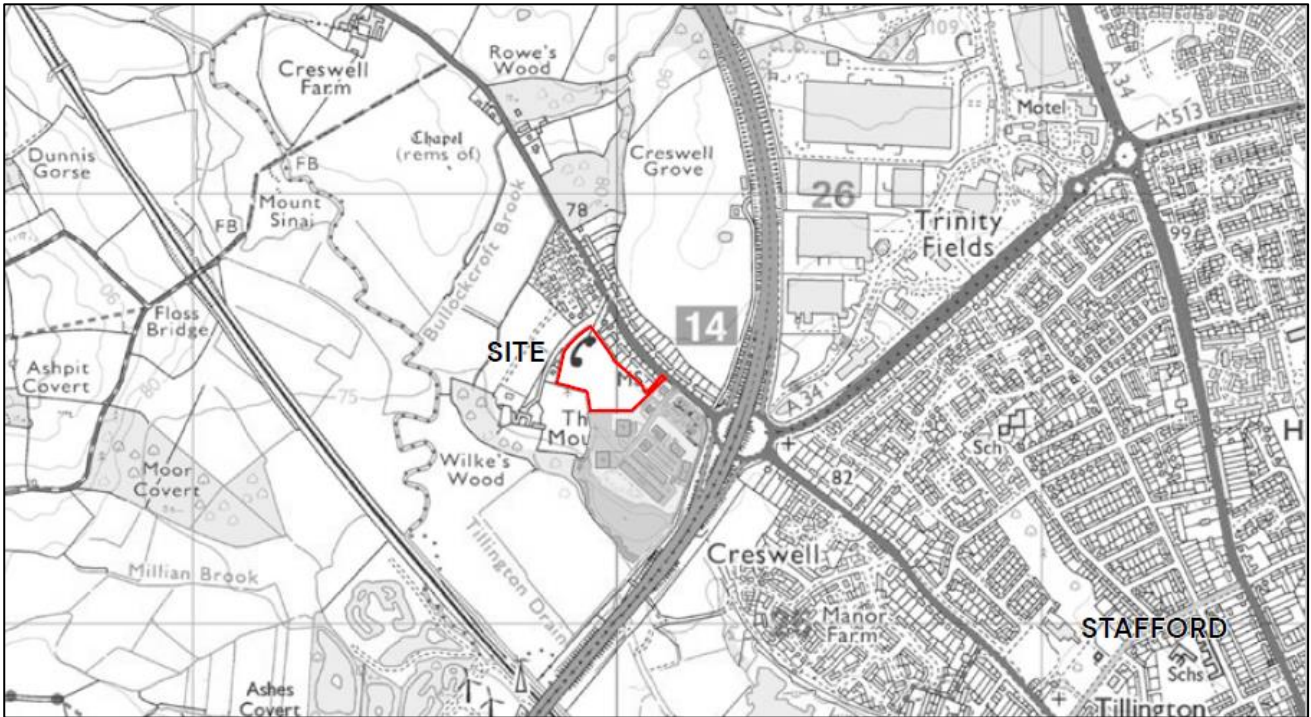


6. CONCLUSIONS

- 6.1. These representations have been prepared by Pegasus Group on behalf of the Malpass Brothers.
- 6.2. Concerns raised relative to the approach taken in the Local Plan to deliver new employment development. In particular the Local Plan lacks a clear employment strategy set out within Policy 1 of the Preferred Option Local Plan which is consistent with much of the evidence provided in the EHDNA and in particular market evidence with regards to need.
- 6.3. In addition, concern is raised in regard to the approach to the allocation of land within Policy 1. In particular the reliance on the Meecebrook Site to deliver 15 ha of employment land within the Plan period.
- 6.4. Furthermore, the Plan relies significantly on the utilisation of existing commitments. This reservoir of employment land is heavily reliant on historic permissions which do not appear to have come forward and suggest that they are not meeting current market requirements.
- 6.5. The emphasis placed on the Stafford Station Gateway Site to deliver employment development is not supported. This site is relatively small in employment terms and is also largely dependent on other regeneration aspirations. It would have limited benefits in meeting employment land requirements and its recognition as such in Policy H1 is not justified.
- 6.6. Finally, land at Creswell should be included as an additional employment allocation under Policy 12. This site has clear and significant benefits in utilising existing infrastructure and delivering employment development which would meet with market demand and the overarching vision of the Local Plan to minimise travel and utilise infrastructure.



APPENDIX A – SITE LOCATION PLAN





APPENDIX B – VISION DOCUMENT

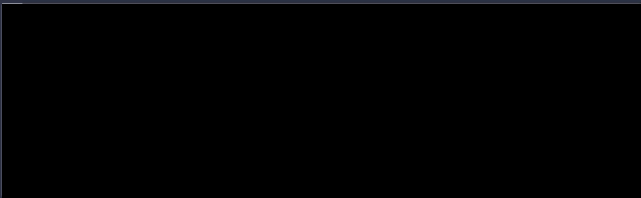
Attached on separate document with submission.



APPENDIX C – TRANSPORT STRATEGY NOTE

Attached on separate document with submission.

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004



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LAND AT CRESWELL

VISION DOCUMENT

Prepared by Pegasus Group on behalf of Malpass Bros.

December 2022 | P20-3311



LAND AT
CRESWELL





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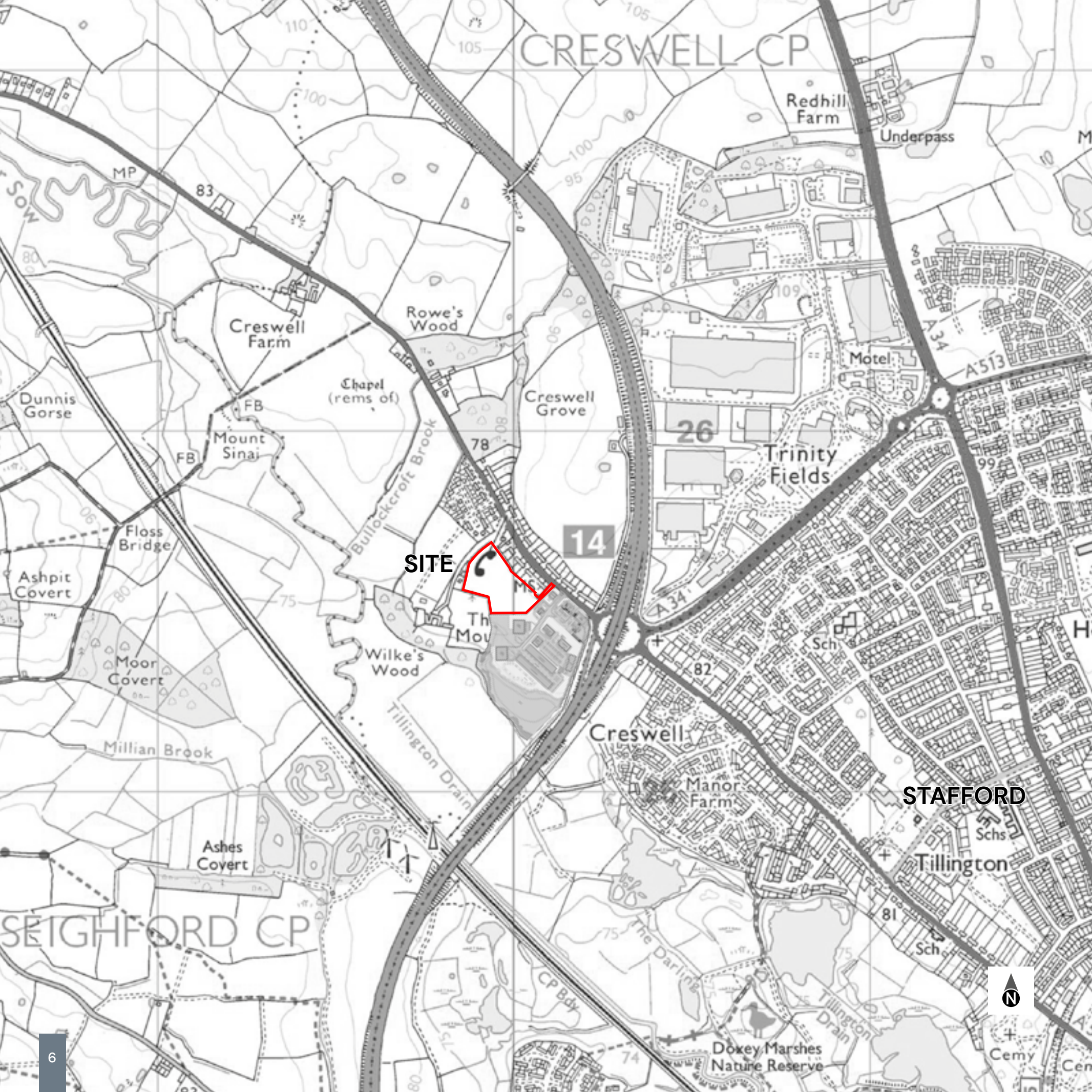
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INTRODUCTION

- 1.1 This promotional document is supplied in support of a potential development of 2.4 ha (6 acres) of land to the east of Creswell Grove. The land is owned by the Malpass Brothers, a family who previously owned and farmed the surrounding agricultural land including that now developed for the Prologis Distribution Park. The site is sandwiched between the commercial development currently being developed by Staffordgate (which includes offices, industrial/trade counter units, public house, hotel, day nursery and petrol filling station/shop and drive-thru coffee shop), existing residential development on the south side of Creswell Grove and Creswell Drive.
- 1.2 Stafford Borough Council consulted on their New Local Plan Issues and Options Document in the first half of 2020. This set out a range of issues facing the Borough and how the Local Plan would need to address these over the next 20 years.
- 1.3 Following this, the Council are now consulting upon a Preferred Options including proposed site allocations and an updated policies map, known as the Preferred Options plan.
- 1.4 Previously the site has been promoted. Council's 'call for sites' process, as being suitable for residential development. There is now the opportunity to gain access through the adjacent 'Staffordgate' site, which opens up the opportunity to provide a commercial/employment development of the land. This promotional document has been provided to illustrate the potential of land off Creswell Grove to contribute towards meeting employment needs over the next plan period and so assist the Borough Council in meeting its need for new employment growth.
- 1.5 The promotional document provides an analysis of the site and its context including any on or off-site constraints. It undertakes a review of the current and emerging planning policy both from a national and local perspective. The document undertakes a thorough analysis of its surrounding context and the character of the wider area. Following this it provides a potential development option for the site which addresses key constraints and opportunities.
- 1.6 An illustrative masterplan has been prepared which shows how the site can come forward in a way which ensures that there will be no adverse impact on any surrounding area and how the proposal can be fully integrated within the existing urban environment. Overall, the promotional document provides a robust analysis of the site and identifies its potential as a sustainable and strategically accessible location for new employment development, well integrated with the existing urban area and in particular making use of its proximity to the M6. It demonstrates how a safe access can be provided and how the proposal can contribute towards meeting the employment land needs which will have been established in the forthcoming Local Plan.

02

SITE CONTEXT



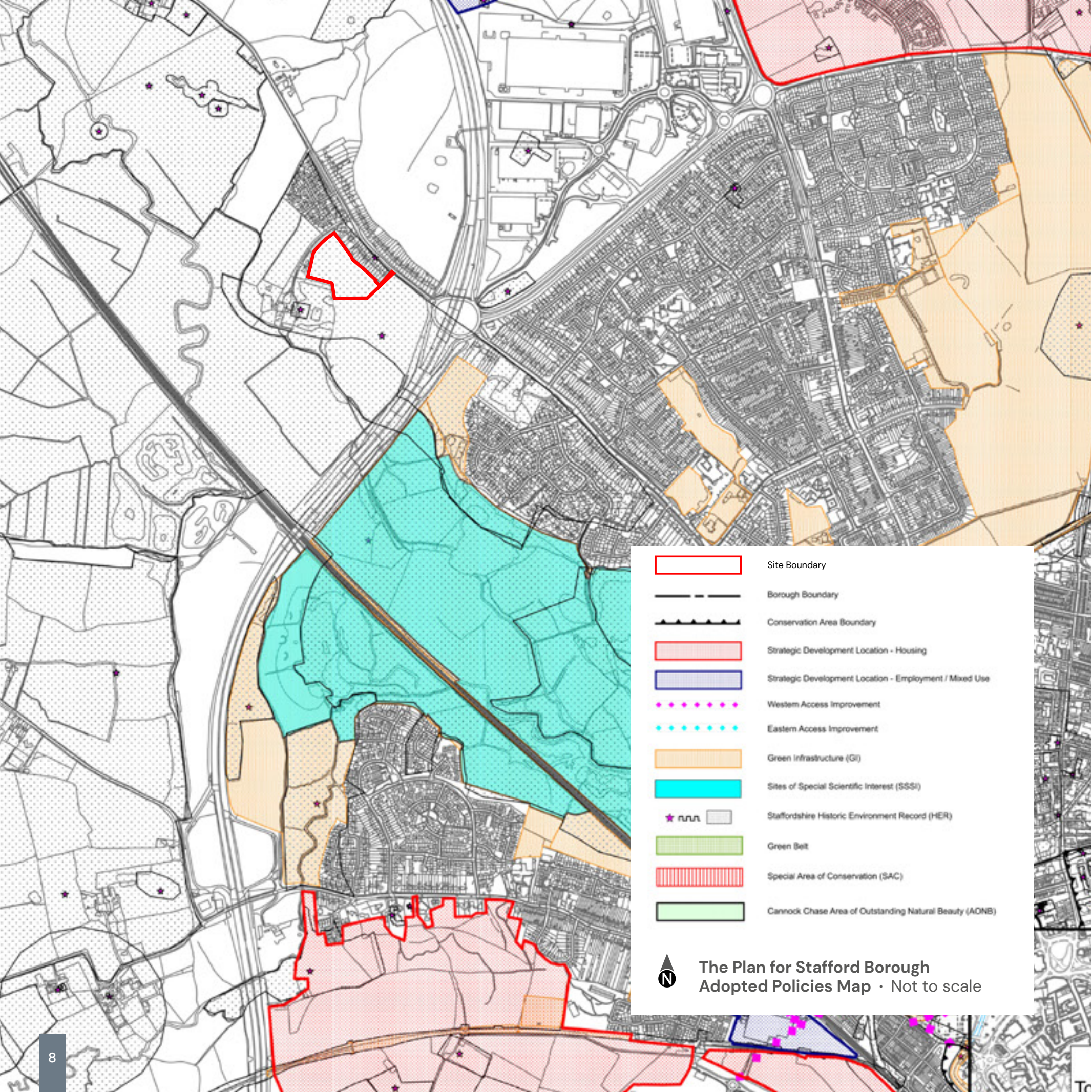
- 2.1 The site is currently used for agricultural purposes. Its boundaries are formed by the new commercial development to the south, existing gardens of residential properties on Creswell Grove to the east, Creswell Drive to the north and an existing belt of trees to the west. Access is currently obtained onto the A5013 Eccleshall Road by a 6-metre-wide field entrance immediately adjacent to No. 1 Creswell Grove.
- 2.2 Creswell Drive is a private drive which formerly served Creswell Hall. The Hall was demolished in the early part of the 20th Century, but the stable/service buildings remain and have been converted into residential accommodation. Creswell Drive also serves as the access to two other residential properties. Residential development on Creswell Grove comprises of detached and semi-detached two-storey

- properties set back from the road with car parking in front. The housing dates from the interwar period. Further to the north, beyond Creswell Drive, housing is characterised by later 20th Century development, and this includes housing off Wilkes Wood.
- 2.3 Access to the site is now to be provided through the adjacent commercial development Staffordgate. This site is under construction and will deliver a mixed use commercial development. The proposed allocation would in effect act as an extension to the Staffordgate development. The access point would be located on the southern boundary between the proposed community room and an industrial unit. Information on access arrangements is contained in Appendix A of this document.

- 2.4 To the east of the site is the M6 Motorway and its Junction 14 with the A34. Junction 14 is a grade separated motorway junction with the M6 on an elevated section. The junction is in part traffic light controlled.
- 2.5 The site itself is gently undulating with land rising to the west and east with the central portion of the site being the lowest point. The site is crossed by an electricity line mounted on wooden poles. The boundary to Creswell Drive contains some sporadic trees whilst the western boundary is more heavily wooded. Boundaries to the residential properties on Creswell Grove are more variable comprising of close boarded fences, hedges, outbuildings, and some trees. There is an existing former telecom building located immediately adjacent to the existing field access. This falls outside of the ownership of the Malpass Brothers.

03

PLANNING CONTEXT



- 3.1 In July 2021, the Government published a revised National Planning Policy Framework (“NPPF”) which replaces the previous guidance published in 2012. The NPPF provides the overarching planning framework for England. Central to the Framework is a presumption in favour of sustainable development which is the golden thread running through both plan-making and decision-taking (paragraph 11). The Framework also seeks to support economic growth and productivity, allowing each area to build on its strengths, counter any weakness and address challenges for the future (paragraph 81).
- 3.2 Paragraph 8 of the NPPF sets out that sustainable development has three overarching objectives: economic, social and environmental.

- 3.3 Chapter 6 of the NPPF sets out how authorities should help create the conditions in which businesses can invest, expand and adapt. This is a key national objective, and directly relates to the economic element of sustainable development, and will need to be addressed through the preparation of the new Stafford Local Plan.

THE CURRENT DEVELOPMENT PLAN

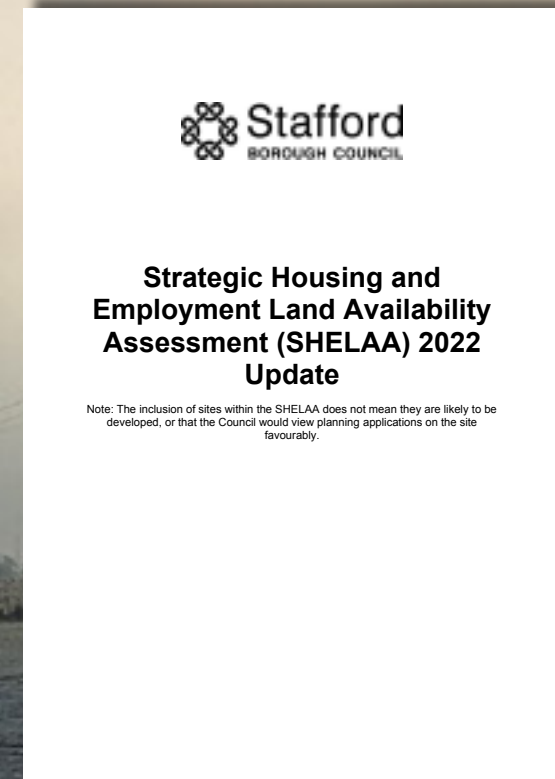
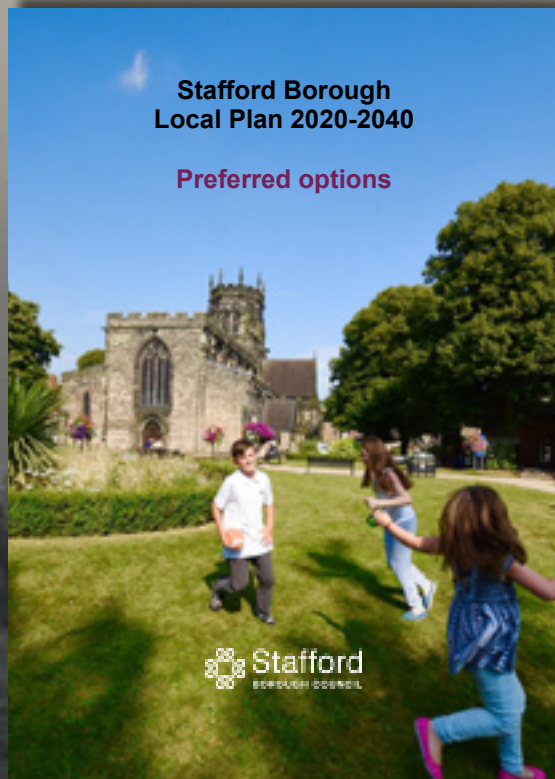
- 3.4 The Development Plan for Stafford Borough currently comprises of The Plan for Stafford Borough (2011 to 2031) adopted June 2014 and the Plan for Stafford Borough – Part 2 adopted January 2017.
- 3.5 Spatial Principle 3 of the adopted Local Plan sets out the sustainable settlement hierarchy for the Borough. The County Town of Stafford is identified as being at the top of the hierarchy, given it is located on the national road and rail network and has the highest level of services and facilities, which means it has the greatest potential to provide for major new development.

Ministry of Housing Communities & Local Government

National Planning Policy Framework

The Plan for
Stafford Borough
2011 - 2031
Adopted - 19 June 2014

Planning and Regeneration | www.staffordbc.gov.uk



EMERGING LOCAL PLAN

- 3.6 Stafford Borough Council has commenced work on a new Local Plan to replace the adopted Plan for Stafford Borough. The new Local Plan 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 currently has a requirement for local planning authorities to keep their Local Plan up-to-date by undertaking a review at least every five years.
- 3.7 The Council have now produced its Preferred Option Local Plan. This sets out a development strategy which will underpin site allocations across the Borough. In particular, Policy 1 of the Preferred Options identifies that provision will be made for at least 80 ha of new employment land. It identifies that the employment land requirement will be delivered through the redevelopment of land in Stafford, completion of existing employment land commitments, the development of other employment site allocations and 15 ha of employment land at Meecebrook. In terms of new employment allocations, a site is proposed north of Redhill as identified in Policy 12 in close proximity to the Creswell site.
- 3.8 The site at Creswell, whilst being considerably smaller than the Redhill Employment Allocation, does benefit from having closer direct access to Junction 14 of the M6.

STRATEGIC HOUSING AND EMPLOYMENT LAND AVAILABILITY ASSESSMENT

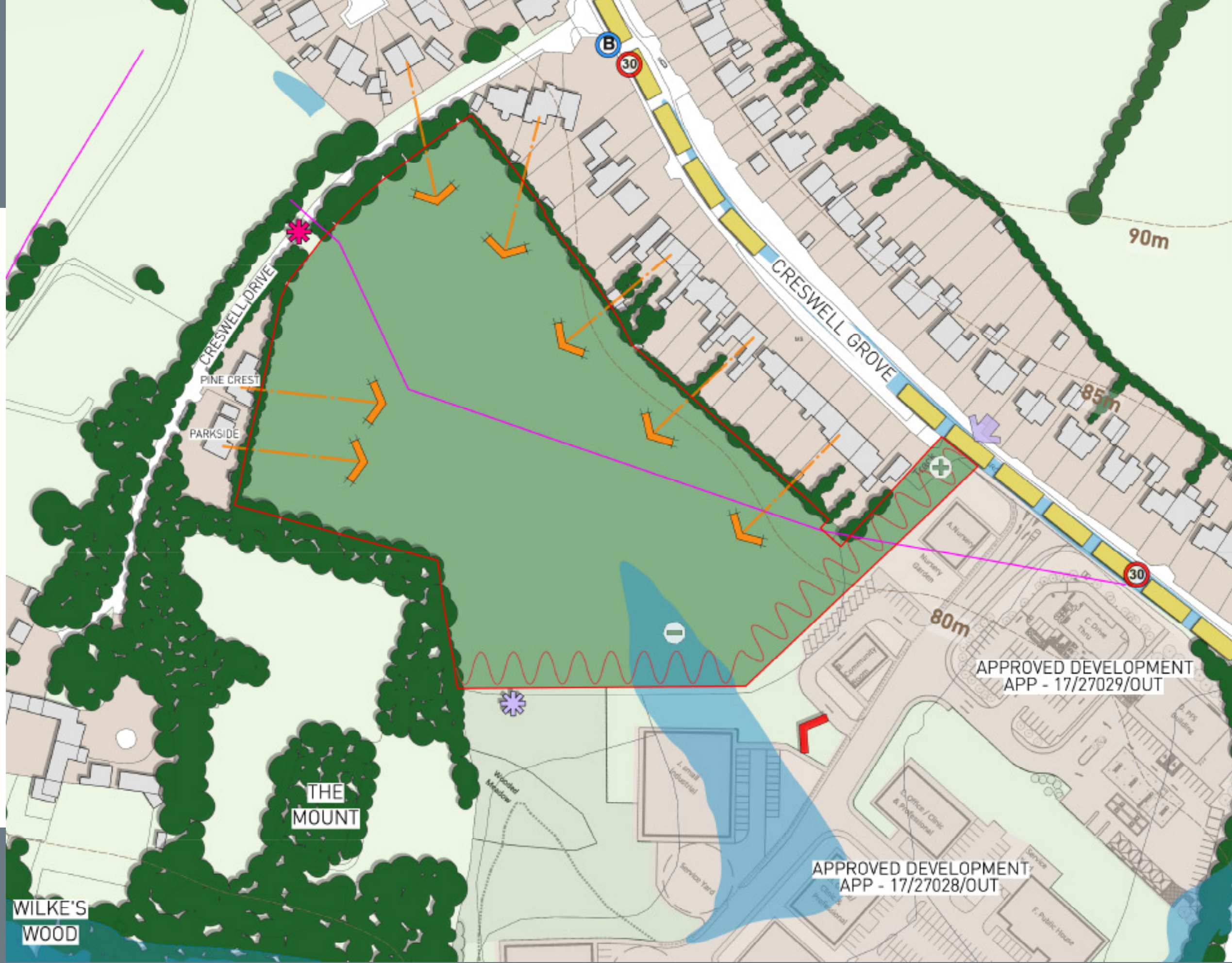
- 3.9 The site was considered in the Council's SHELAA 2022. The Council's rejection of the site for development is based upon it not being adjacent to a recognised Local Plan settlement. However, this approach does not take into account the strategic importance of its location for employment development being adjacent to Junction 14 of the M6. In addition, it fails to recognise that the adjacent Staffordgate development, which is identified in the Preferred Option Local Plan as forming part of the Council's employment land supply (Appendix 7 of the Preferred Option Local Plan), is now under construction. This development has established the principle of employment related development in this location.
- 3.10 In addition, Creswell has now been identified as being a settlement with a defined settlement boundary. This boundary is located immediately adjacent to the promotion site. As a result the site now sits between the Staffordgate site (which is part of the Council's employment land supply) and the development boundary for Creswell as defined in the Preferred Options. Consequently, the reasons for rejecting the site in the SHEELA are no longer robust.



04

SITE AND CONTEXTUAL ANALYSIS

- 4.1 This site is greenfield and is in use for agricultural purposes, however it is encircled by built development. On its north-eastern edge are the residential properties on Creswell Grove whilst the north is the private drive known as Creswell Drive along with further residential properties. Its western boundary is formed by a substantial woodland. To the south is the Staffordgate commercial development now under construction.
- 4.2 Of particular note, the site is located in close proximity to Junction 14 of the M6. The Motorway represents the most important strategic road in the Borough and this is particularly significant for employment development.
- 4.3 The development of the commercial area to the south of the site is clearly material in considering its potential for employment development. It established the principle of employment development in this location. The new Staffordgate development will provide direct access into the site. This will mean it has a specifically designed new access capable of accommodating an employment allocation and in effect the site can act as an extension to the existing employment site of Staffordgate.
- 4.4 The site does not contain any trees or other features within it other than on its boundaries. It is relatively unconstrained in terms of its development potential.

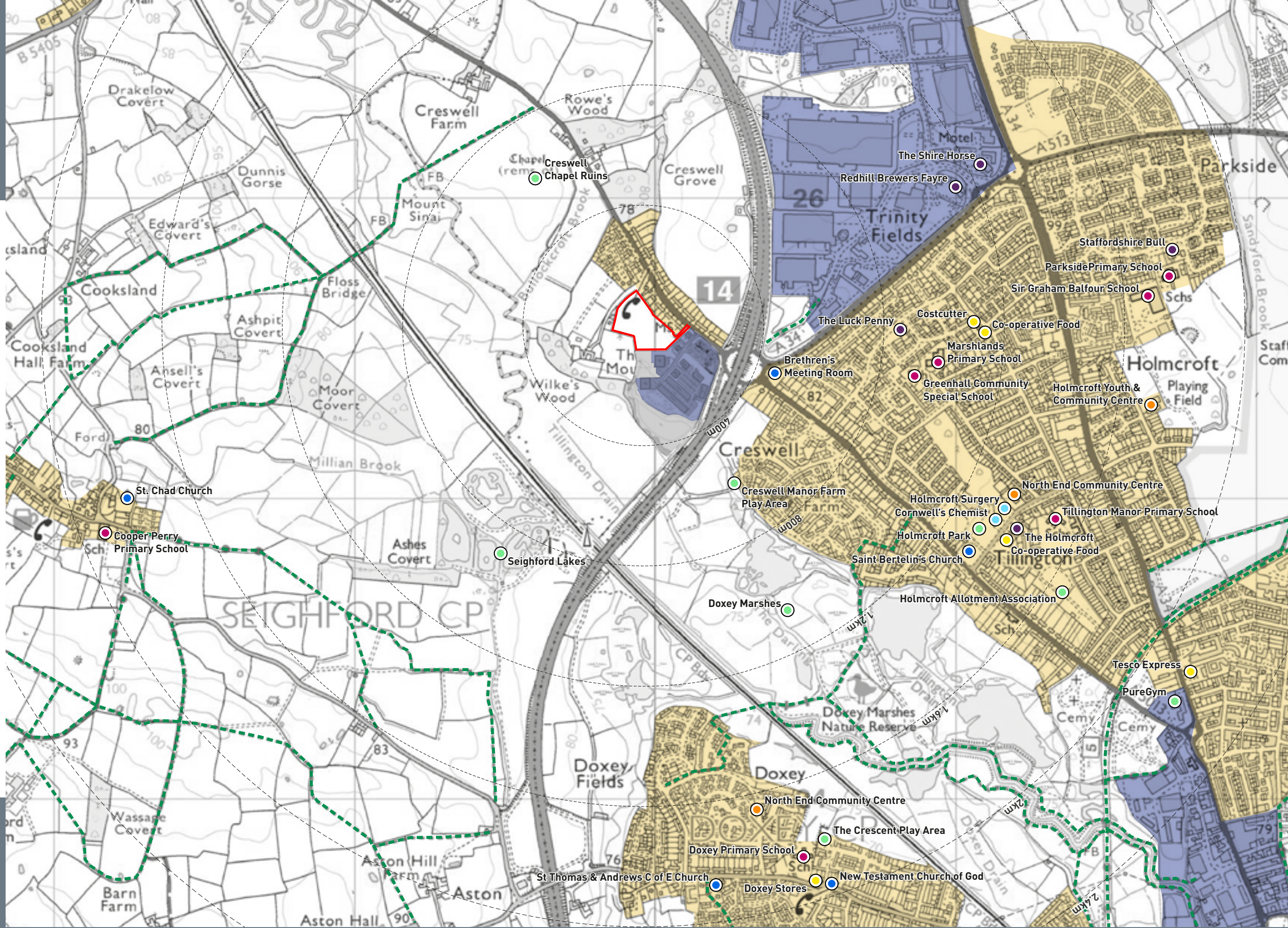


KEY

-  SITE LOCATION (TBC)
6.42 ACRES / 2.60 HECTARES
-  EXISTING PRIMARY MOVEMENT
INFRASTRUCTURE
-  POTENTIAL NOISE POLLUTION FROM
NEIGHBOURING DEVELOPMENT
-  EXISTING SITE ACCESS
-  POTENTIAL SITE ACCESS
-  POTENTIAL PEDESTRIAN ACCESS
TO CRESWELL DRIVE (TBC)
-  POTENTIAL PEDESTRIAN ACCESS NEIGHBOURING
GREEN INFRASTRUCTURE (TBC)
-  BUS STOP
-  SPEED LIMIT
-  POTENTIAL VIEWS FROM
NEIGHBOURING PROPERTIES
-  SITE HIGH POINT
(SOURCE - <https://vlp2.approp.com/whereispath.htm>)
-  SITE LOW POINT OPPORTUNITY FOR DRAINAGE
(SOURCE - <https://vlp2.approp.com/whereispath.htm>)
-  INDICATIVE CONTOUR LINES - 5M
(TBC by survey)
-  EXISTING VEGETATION
(INDICATIVE)
-  FLOOD RISK SURFACE WATER
(SOURCE - <https://flood-warn.rp-infomedia.service.gov.uk/>)
-  FLOOD RISK RIVERS AND SEA
(SOURCE - <https://flood-warn.rp-infomedia.service.gov.uk/>)
-  INDICATIVE LOCATION OF OVERHEAD PYLONS
(TBC by utilities survey)
-  EXISTING BUILT FORM



Site Constraints & Opportunities · Not to scale



KEY

- SITE BOUNDARY
 - BUILT-UP AREA (PREDOMINANTLY RESIDENTIAL)
 - EMPLOYMENT/FACILITIES
 - PEDESTRIAN ROUTE
- | Facilities | |
|--|----------------------|
| | LEISURE & RECREATION |
| | RETAIL |
| | HEALTHCARE |
| | COMMUNITY |
| | PLACE OF WORSHIP |
| | EDUCATION |
| | PUBS AND RESTAURANTS |



Local facilities · Not to scale

THE DEVELOPMENT PROPOSAL

INTRODUCTION

5.1 The ability to access the site via the Staffordgate development gives the opportunity to bring forward employment-based development. This takes full advantage of the site's strategic location immediately adjacent to Junction 14 of the M6. Locational factors such as proximity to the strategic road network is a primary factor in many employment uses. This ability to access directly into the strategic highway network has led to the site being identified for an employment-based development rather than residential development.

USE

5.2 The site is ideally placed to provide new employment development (Class B uses). This could take the form of storage and distribution uses or manufacturing and is likely to be particularly attractive to uses requiring direct access to the strategic road network.

ACCESS

5.3 Detailed consideration has been given to the access into the site. This will consist of a 7.3m carriageway capable of accommodating larger vehicles associated with Class B land uses, with 2m footways provided on either side of the carriageway. A dedicated pedestrian and cycle access would be provided connecting the site with existing infrastructure on A5013 (Creswell Grove) and the proposed signalised pedestrian crossing which will be delivered in association with the adjacent site, approximately 20m west of the approved access junction.

5.4 Detailed information is provided within Appendix A relative to the potential to add additional traffic via the Staffordgate's development site onto the surrounding road network. This has demonstrated that there is sufficient capacity to allow for the

development of the site for employment purposes, thus making use of its strategic location adjacent to the motorway network.

TRANSPORT

5.5 The site is suitably located to provide an employment development relative to its location in proximity to existing residential areas and the approved adjacent sites. It is accessible by foot, cycle and public transport. The review of the accessibility of this site suggests that there are some alternatives for sustainable travel, but that this could be improved by additional provisions on site.

5.6 Footways are generally provided on both sides of the carriageways within the local area. Pedestrian routes benefit from lighting and dropped kerbs with tactile paving at crossing points. An off-road shared use footpath/ cycle path is also provided to the east of the site connecting Creswell Interchange, towards the wider Creswell area.

5.7 The closest bus stop is located on the A5013 (Creswell Grove), to the north of the site, close to its junction with The Mount / Creswell Drive. These stops are served by bus route 432 which provides connections to Stafford Town Centre to the southeast and Eccleshall, via Great Bridgeford, to the northwest with approximately one bus an hour on weekdays, and one bus every two hours on a Saturday. The closest railway station to the site is Stafford, located circa 3.5km south of the site. The station provides regular, direct services to Birmingham New Street, Rugby, Crewe, Liverpool Lime Street, Southampton, London Euston and Manchester."

5.8 The local highway network in the vicinity of the site operates safely and that there are no material existing highway safety issues within close proximity to the site.

QUANTUM

5.9 The total development area equates to 1.7 ha of land. An Illustrative Masterplan has been produced showing how the site could be developed for a small number of industrial/ storage type units.

5.10 In addition, the potential for the site to be occupied by a larger single unit which could also be of interest to those employment operations that require close proximity to the strategic highway network.

5.11 The layout has demonstrated that there is scope to provide for pedestrian and cycle routes into the development site, maximising the potential of employees to use sustainable modes of transport.

GREEN INFRASTRUCTURE

5.12 The site provides the opportunity to integrate a new employment development within an established verdant character.

5.13 New ribbon style green infrastructure can be provided along the site's boundaries to minimise the impact of any new employment buildings.

5.14 There is opportunity to extend existing green infrastructure to the south by providing additional planting and extended movement routes for foraging of animals.

5.15 Development and green infrastructure can provide opportunities for visual corridors into the surrounding countryside and Wilk's Wood.

5.16 The site can provide opportunities for sustainable urban drainage which in turn can also be utilised for nature conservation/biodiversity enhancement.





KEY

	SITE LOCATION (TBC) 6.42 ACRES / 2.60 HECTARES		EXISTING BUILT FORM
	POTENTIAL SITE ACCESS VIA APPROVED NEIGHBOURING INFRASTRUCTURE		EXISTING VEGETATION (INDICATIVE)
	APPROVED NEIGHBOURING INFRASTRUCTURE PROVIDING ACCESS TO EXISTING CRESWELL GROVE		PROPOSED STRUCTURAL PLANTING
	PRIMARY MOVEMENT ROUTE 7.3M WITH 2 X 2M FOOTPATHS		PROPOSED ORNAMENTAL PLANTING
	SECONDARY ACCESS ROUTES		SUSTAINABLE DRAINAGE SOLUTIONS (TBC)
	POTENTIAL ACCESS TO UNIT B, COMMUNITY HUB (PLEASE REFER TO DRAWING P20-3311-TR - SK01 PRELIMINARY ACCESS PLAN OPTION 1)		POTENTIAL VEHICULAR ACCESS TO BE PROVIDED TO 1 CRESWELL GROVE (TBC)
	POTENTIAL PEDESTRIAN/CYCLE MOVEMENT ROUTES		POTENTIAL LANDSCAPED ACOUSTIC BUND (TBC)

KEY PRINCIPLES:

1. Proposed site access via neighbouring developments;
2. Tree lined primary vehicular movement route 7.3m with 2 x 2m pedestrian footpaths;
3. Proposed 3.5m pedestrian/cycle movement route connecting Creswell Grove to potential development;
4. 8m landscape buffer with acoustic bund providing screening to existing development;
5. 10m offset to existing vegetation at Wilke's Wood;
6. Site low point utilised for sustainable drainage; and;
7. Additional native planting buffer to existing development on Creswell Drive.

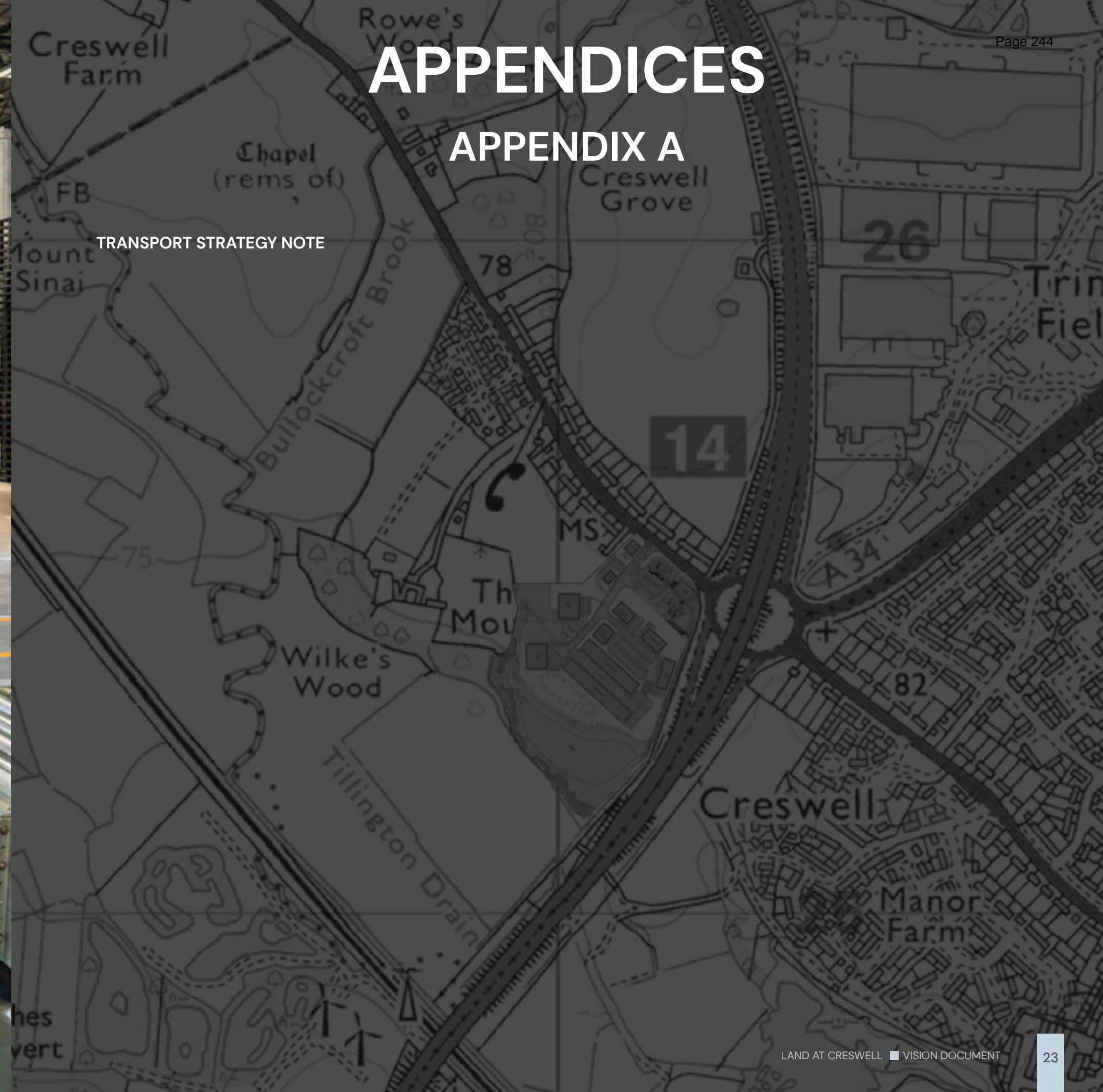


Development Framework · Not to scale

APPENDICES

APPENDIX A

TRANSPORT STRATEGY NOTE





TRANSPORT STRATEGY NOTE

Project name: Land at Creswell Grove
Author: ██████████
Date: 08 December 2022
Project number: P20-3311
Reference: TRO1

1. INTRODUCTION

- 1.1. This Initial Transport Strategy Note has been prepared by Pegasus Group on behalf of Malpass Bros to support the Vision Document. It supports the promotion of Land at A5013 (Creswell Grove), Stafford for an employment development adjacent to the approved 17/27029/FUL and 17/27028/OUT application sites. The development descriptions of these sites are provided below:
 - 17/27029/FUL – Erection of petrol filling station, ancillary shop, and drive-through coffee shop, together with access parking and landscaping.
 - 17/27028/OUT – Phased development comprising small office units, professional consulting suites, small light industrial/trade counter units, a family public house, a 60 bed-hotel, day nursery, community assembly/meeting room and associated works.
- 1.2. This note has been prepared following both a site visit (undertaken on 16th November 2022) and a desk-top review of publicly available information. It has not been undertaken with the benefit of discussions with the Local Highway Authority (LHA), National Highways, full land ownership data, up to date traffic surveys or junction capacity assessment modelling. Should the site be progressed, we would recommend scoping discussions are undertaken as early as possible with the LHA and National Highways in order to seek their view on the access location identified and potential capacity of the local highway network.
- 1.3. It is intended to work collaboratively with the highway authorities and other stakeholders to agree the appropriate strategies to encourage sustainable travel and to mitigate residual impacts associated with the scheme, as appropriate, in due course.
- 1.4. The site comprises 2.60 hectares and is currently utilised for agricultural purposes. It is located to the southwest of A5013 Creswell Grove and is bound by dwellings to the northeast; 'The Mount' / Creswell Drive private road and housing estate to the north and west, and the approved 17/27029/FUL mixed-use development to the southeast. The proposed site is located within Creswell, approximately 3km to the northwest of Stafford Town Centre.
- 1.5. The employment site is likely to comprise circa nine units, equating to a total of 8,640sqm, with the following indicative breakdown currently being proposed. The end users of the site are currently unknown and as such the development quantum and unit sizes are not fixed, however is likely to include a variety of B class uses, such as B2 or B8. An Indicative

Reference: P20-3311-TRO1

1



Masterplan has also been produced to accompany the vision document and is provided as Appendix A.

- Unit 1 – 2 Storey (1,400sqm)
- Unit 2 – 2 Storey (1,780sqm)
- Unit 3 – 2 Storey (960sqm)
- Unit 4 – 2 Storey (1,000sqm)
- Unit 5 – 2 Storey (880sqm)
- Unit 6 – 2 Storey (1,000sqm)
- Unit 7 – 1 Storey (740sqm)
- Unit 8 – 1 Storey (440sqm)
- Unit 9 – 1 Storey (440sqm)

- 1.6. The indicative site location is shown at Plate 1.1. The indicative masterplan provided as Appendix A provides additional detail.

Plate 1.1 Indicative Site Location Plan



Reference: P20-3311-TRO1

2



2. Existing Highway Network

Site Access

- 2.1. The site is currently accessed off the A5013 (Creswell Grove) to the northeast of the site boundary, via an agricultural gated gravel track. As part of indicative proposals, this would be amended to provide a pedestrian/cycle access, and a new vehicular access will be promoted through the approved adjacent site. Full details of the access proposals are set out in Section 3 of this note.

A5013 (Creswell Grove)

- 2.2. The A5013 is a single carriageway, circa 6.7m in width which routes between the M6 Junction 14 Creswell Interchange (referred to as Creswell Interchange throughout the remainder of this report) in the east, and the A519 in the west.
- 2.3. Within the vicinity of the site the A5013 is subject to a 30mph posted speed limit. In addition to posted speed limit signs, there are electronic vehicle activated signs which display drivers' speeds as they travel along the carriageway. These vehicle activated signs are on either side of the carriageway to cover both directions of travel.
- 2.4. The speed limit on A5013 increases to 50mph circa 250m to the northwest of the site at the urban edge where the A5013 becomes a rural carriageway towards the village of Great Bridgeford.
- 2.5. The A5013 benefits from street lighting and footways, between circa 0.7 and 1.5m in width within the vicinity of the site. In most parts footways are provided on both sides of the carriageway however currently footways are only provided on the southeast-bound side of the carriageway at the site frontage. As part of the adjacent application site, footways will be implemented at this location, tying into existing provision. Thus, providing footways on both sides of the A5013 in the vicinity of the site access.

The Mount / Creswell Drive

- 2.6. The Mount / Creswell Drive is a private residential driveway serving a small number of dwellings. It routes southwest from the A5013 forming the north-western boundary to the proposed site.

Wilke's Wood

- 2.7. Wilke's Wood is a residential network of cul-de-sacs, accessed off the A5013 approximately 90m west of the proposed site. Wilke's wood benefits from street lighting and footways on either side of the carriageway. There is a HGV restriction on Wilke's Wood.

M6

- 2.8. The M6 is located circa 150m to the east of the site boundary, and forms part of the strategic road network. From the site it can be accessed via Creswell Interchange north and southbound slip roads. It should be noted that as part of the development proposals

Reference: P20-3311-TRO1

3



associated with the adjacent applications, the A5013 (Creswell Grove) eastbound approach to Creswell Interchange will be widened to provide two lanes for approximately 60m.

Highway Safety

- 2.9. A review of the personal injury collision data on CrashMap database suggests that there has been only one collision on the A5013 within close proximity to the site within the last five years for which data is available (2017-2021).
- 2.10. This collision occurred in June 2017, circa 190m northwest of the site on the A5013, and was classified as slight. The collision did not result in any pedal cycles or pedestrian casualties. It did involve a heavy goods vehicle.
- 2.11. No collisions were recorded on the Mount / Creswell Drive or Wilke's Wood within this time period, nor on the A5013 approach to the Creswell Interchange.
- 2.12. Five collisions were recorded at the M6 / A5013 / A34 partially signalised roundabout junction (Creswell Interchange) of which one was classified as serious and four as slight. These collisions occurred at various locations around the roundabout junction with no cluster identified. Two of the slight collisions involved heavy good vehicles and the serious collision resulted in a pedal cyclist casualty.

Policy Background

- 2.13. The main objectives within the national and local policy guidance are to:
 - i. Reduce the need to travel;
 - ii. Reduce car dependency; and
 - iii. Encourage sustainable travel such as walking, cycling and public transport trips.
- 2.14. In transport terms, the NPPF recognises that development should only be refused on transport grounds where there would be an unacceptable impact on highway safety, or the residual cumulative impacts are severe (paragraph 111).
- 2.15. Stafford Borough Strategic Site Options Report (December 2019) sets out the key constraints to be considered when determining the suitability of a site, as follows:
 - Ensuring safe and satisfactory access can be secured for pedestrians, cyclists, public transport and private vehicles;
 - Where the site cannot be accessed other than via third party land, that is not currently being promoted for development, this has been stated in the detailed assessment and, unless evidence exists to the contrary, it is assumed that the site is inaccessible and therefore unsuitable for development;
 - Reviewing site accessibility to key local facilities, taking into account opportunities and constraints for improving the walking, cycling and public transport network;
 - Reviewing the existence of other physical constraints, including significant trees, utilities infrastructure, hazardous installations, and facilities of social, amenity or community value.

Reference: P20-3311-TRO1

4



2.16. This transport strategy note considers the above constraints in accordance with Stafford Borough Strategic Site Options Report. It demonstrates how the site can be accessed by all and is located in a suitable location with regards to existing facilities and infrastructure.

2.17. In relation to the second constraint listed above, it should be noted that the adjacent site has received planning permission and work has begun on site. On that basis, although the access to this development is being promoted through third party land, it is considered that the adjacent site has already progressed beyond “being promoted for development” and therefore the proposed site is accessible and considered suitable for development in transport terms.

Summary

2.18. This section of the report has reviewed the local highway network in the vicinity of the site.

2.19. It is concluded that the local highway network in the vicinity of the site generally operates safely and that there are no material existing highway safety issues within close proximity to the site.



3. ACCESSIBILITY

Existing Cyclist and Pedestrian Access

3.1. This note has been prepared following both a site visit (undertaken on 16th November 2022) and a desk-top review.

3.2. Footways are generally provided on both sides of all carriageways within the local area. Pedestrian routes benefit from lighting and dropped kerbs with tactile paving crossings. No formal pedestrian crossings are currently provided on the A5013 within the vicinity of the site, although a signalised crossing at the site frontage is proposed as part of the adjacent development planning application that has been approved and for which construction has started on site (see below).

3.3. An off-road shared use footpath/ cycle path is also provided to the east of the site connecting Creswell Interchange, towards the wider Creswell area to the northeast.

Consented

3.4. A signalised pedestrian crossing over A5013 (Creswell Grove) is consented as part of the adjacent site’s development proposals. The crossing will be provided circa 20m west of the approved access to the adjacent site, and approximately 140m west of Creswell Interchange. Additionally, as part of that site’s access proposals footway provision will be provided on the eastbound side of the A5013 (Creswell Grove along the entire site frontage).

Existing Public Transport Provision

Bus

3.5. The closest bus stop is located on the A5013, to the north of the site, immediately south of its junction with The Mount / Creswell Drive. This bus stop is on the southeast-bound side of the carriageway and comprises a layby, shelter with flagpole and timetable information. It also indicates northwest bound services will stop opposite the layby although no physical bus stop infrastructure is provided for services in this direction.

3.6. These stops are served by bus route 432 which provides connections to Stafford Town Centre to the southeast and Eccleshall, via Great Bridgeford, to the northwest with approximately one bus an hour on weekdays, and one bus every two hours on a Saturday. There is no service from this stop on Sundays.

Rail

3.7. The closest railway station to the site is Stafford, located circa 3.5km south of the site. The station provides regular, direct services to Birmingham New Street, Rugby, Crewe, Liverpool Lime Street, Southampton, London Euston and Manchester.

Summary of Accessibility

3.8. The Department for Transport (DfT) document Manual for Streets (MfS) published in 2007 states at paragraph 4.4.1 that walking offers the greatest potential to replace short car trips,



particularly those under two kilometres. LTNI/20 at paragraph 2.2.2 confirms that two in three personal journeys are less than five miles in length, which is deemed an achievable distance to cycle for most people, with many shorter journeys suitable for walking.

3.9. The review of the accessibility of this site suggests that there are some alternatives for sustainable travel, but that this could be improved by additional provisions on site. Additionally, connections to existing off site facilities and the adjacent application sites will be sought as part of this development.



4. PROPOSED ACCESS STRATEGY

Vehicular Access

4.1. It is proposed to provide access via the adjacent application sites. The location of the proposed access is shown on the Indicative Masterplan at **Appendix A**.

4.2. The access would join the consented carriageway which serves the two adjacent application sites, via a simple priority junction, continuing west into the proposed development site. The indicative access location is provided as **Plate 4.1** below.

4.3. The approved neighbouring infrastructure is accessed via a simple priority junction off A5013 (Creswell Grove) circa 120m from Creswell Interchange. This junction comprises a single-entry lane and two exit lanes, one for vehicles turning left and one for vehicles turning right.

4.4. The main carriageway into the approved sites from this access junction comprises a wide single carriageway which (not including the flare for the access junction) reduces from circa 10m to 7.3m for the remainder of the internal circulation, with circa two metre footways on both sides of the carriageway. This junction has been designed with circa 15m radii and tapers to accommodate UK maximum length HGVs as demonstrated on drawing NTH/244/TT100 (included as **Appendix B**) which supports applications 17/17029/FUL and 17/27028/OUT.

4.5. An indicative site access design has been prepared, included as **Appendix C** in accordance with relevant guidance, in keeping with the approved adjacent infrastructure demonstrating how it would join into the adjacent sites internal access road. Details of the access junction and road will be progressed and amended as necessary through any forthcoming planning application for the site following discussions with the Local Highway Authority (Staffordshire County Council).

Plate 4.1 – Indicative Access Location Drawing





- 4.6. It is our understanding that the LHA (Staffordshire County Council) do not provide specific industrial highway design guidance. As such the Local Distributor Road Technical Standards as set out in the Staffordshire Residential Design Guide, was assumed to be the most appropriate guidance and has been referenced for this design.
 - 4.7. The access has been designed to accommodate a 7.3m carriageway, with two metre footways on either side and radii of 10m, in accordance with the Local Distributor Road Technical Standards as set out in the Staffordshire Residential Design Guide.
 - 4.8. Visibility splays of 2.4m x 43m in accordance with Manual for Streets guidance and a 30mph speed limit can be achieved to the left and right of the access junction as shown on Pegasus Drawing P20-3311-TR-SK01 included at **Appendix C**. It is assumed that in reality vehicle speeds would be under 30mph given the proposed geometry and number of junctions served by the access road, therefore it is considered these visibility splays are potentially longer than necessary. This would require discussion with the LHA at the appropriate time.
 - 4.9. Local Distributor Road Technical Standards as set out in the Staffordshire Residential Design Guide suggest that a minimum of 80m spacing should be provided between junctions on the same side of the carriageway, and 40m spacing between junctions on the opposite side of the carriageway. The approved adjacent site provides a minimum of 60m between junctions on the same side of the road and provides junctions on the opposite sides of the carriageway with negligible spacing.
 - 4.10. It is proposed to repurpose the existing proposed community centre ingress to additionally serve the proposed site in order to remove the potential conflict which would be introduced as a result of a new separate access.
 - 4.11. It is not considered that a ghost island would be required on the access road for vehicles to turn into the adjacent approved ‘community room’, given the low number of trips proposed by the ‘community room’ and this development (outlined in detail in **Section 4**).
 - 4.12. Staffordshire Residential Design Guide requires a minimum length of 30m of the minor road to be straight, from the channel of the main road. On that basis at least 30m of straight road has been provided from the adjacent site access road into the site.
 - 4.13. Notwithstanding the above, the access junction will be subject to detailed discussion with highways, discussion / agreement with the adjacent landowner/developer. Swept path analysis assessment of the access junction and parking provided throughout the development, for at least the largest vehicle expected to arrive and depart the site will also be undertaken at the appropriate time.
- Internal Roads**
- 4.14. Internal within the site proposed accesses will be provided to the north and south of the main internal road, providing access to individual parcels of employment land (B2/B8 use). The total quantum of the development parcels equates to 8,640sqm. These access junctions will be provided in accordance with relevant design standards and the evolving masterplan.



Refuse and Servicing

- 4.15. Suitable turning areas will be provided within the development such that all vehicles required to access each plot will be able to turn within the individual unit’s curtilage when parking. Delivery and servicing area requirements for the site will similarly be designed appropriately. All vehicles will therefore be able to enter and exit the site in a forward gear. All units will provide turning areas for refuse vehicles and emergency vehicles. In addition, any unit which is likely to be regularly served by HGVs as a result of the proposed land use or identified end user will provide parking and turning areas for these as necessary.

Pedestrian / Cycle Access

- 4.16. The access and internal roads within the proposed site will benefit from 2m wide footways on either side of the carriageway. The proposed footways will link with the approved footways on the adjacent site, resulting in continuous footway connections being provided to the main entrance of each unit within our site.
- 4.17. Additionally, a dedicated 3.5m wide pedestrian and cycle movement route is proposed directly from A5013 (Creswell Grove) to the site access road where footways of 2m in width are provided throughout the site. This is indicated via a green arrow on **Plate 4.1** above. Given the low vehicle volumes and speeds anticipated within the site the carriageway will be suitable to accommodate cyclists within the site.
- 4.18. A signalled pedestrian crossing over A5013 (Creswell Grove) is consented as part of the adjacent site’s development proposals. The crossing will be provided circa 10m east of the proposed pedestrian and cycle route (indicated via a green arrow on **Plate 4.1**) and 20m west of the approved access to the adjacent site. This provides onwards pedestrian routes towards Creswell Interchange and Stafford.

Parking

Vehicular and Cycle Parking

- 4.19. Parking will be provided with consideration of the minimum standards set out in Appendix 4 of the Stafford Borough Local Plan (2020-2040). The proposed land use for the site is currently unknown, although it is expected that the most likely use classes to be proposed are B class / employment uses. The parking standards for general employment uses is set out in **Table 4.1** for reference.
- 4.20. Additionally cycle parking will be provided in accordance with standards, also provided within the Stafford Borough Local Plan (2020-2040). These standards have also been replicated in **Table 4.1** below for reference.



Table 4.1 Stafford Borough Local Plan (2020-2040) Parking Standards

Use Class	Minimum Car Parking Requirement	Minimum Cycle Parking Requirement
E(g) offices, research and development and light industry	1 per 25m ² – 1 per 60m ² dependent on floor area and use class	1 per 36m ²
B2 Industry	1 per 25m ² – 1 per 50m ² dependent on floor area and use class	1 per 60m ²
B8 Storage and Distribution	1 per 80m ²	1 per 80m ² to 1 per 500m ² dependent on floor area

Other Parking

- 4.21. The development will also provide as appropriate Goods Vehicle parking, EV charging facilities, disabled parking, and motorcycle parking in accordance with local standards and building regulations.



5. FORECAST TRIP ATTRACTION AND GENERATION

- 5.1. An estimation of the trip generation which the site could generate has been calculated using trip rates obtained from the TRICs database (V7.9.3).
- 5.2. In order to determine the worst-case scenario, vehicle trip generation has been calculated for both B8 Use Class and Industrial (including Light Industrial, General Industrial and Offices) using the following selection parameters which are considered to filter the results to sites comparable to the proposed site.
 - B8 Use class / Industrial Units;
 - Regions excluding Ireland and London;
 - Quantum between 2,000 and 10,000sqm;
 - Monday to Friday Surveys (Saturday and Sunday data not available for employment sites)
 - Suburban Areas, Edge of Town and Neighbourhood Centres
 - Industrial Zone, Commercial Zone and Village
- 5.3. The trip rates obtained from the TRICs database, and the resultant trip generation for the AM and PM peak hours are outlined in **Table 5.1** below. The full TRICs reports are provided as **Appendix D** of this note.
- 5.4. The potential trip generation for the site has been calculated based on the trip rates and proposed Gross Floor Area (GFA) of 8,640sqm for both a B2 and B8 used class, also summarised in **Table 5.1**.

Table 5.1 – Trip Rates and Trip Generation

	AM Peak (08:00-09:00)			PM Peak (17:00-18:00)		
	Arrivals	Departures	Two-Way	Arrivals	Departures	Two-Way
Industrial						
Trip Rate (Per 100sqm)	0.310	0.048	0.358	0.041	0.200	0.241
Trip Generation (8,640sqm)	27	4	31	4	17	21
B8 Use Class						
Trip Rate (Per 100sqm)	0.287	0.201	0.488	0.160	0.455	0.615
Trip Generation (8,640sqm)	25	17	42	14	39	53



- 5.5. **Table 5.1** demonstrates that in a ‘worst–case’ scenario, if all units were to be developed with B8 class, the development could generate circa 42 additional two-way trips during the morning peak hour and circa 53 additional two-way trips during the evening peak hour. This equates to approximately one vehicle every minute during each of these peak hours.
- 5.6. It should be noted that it is highly unlikely that the number of trips generated by the development will be as high as this, as it is unlikely that site will be progressed for solely B8 use. There is also the potential for some site occupiers to walk, cycle or use the bus to access the site.
- 5.7. An assessment of the number of HGVs arriving to and from the site based on HGV trip rate data from TRICS has also been undertaken, also included within the TRICS reports provided as **Appendix D**. This assessment suggested that in the B8 ‘worst–case’ scenario, the trip generation set out above could include a total of 17 two-way HGV trips in the AM peak hour, and 15 in the PM peak hour.
- 5.8. It is envisaged trip generation of this scale is unlikely to have a significant impact on the adjacent site or local highway network and should be considered acceptable as further considered in **Section 6**. Development of this scale is also likely to be acceptable from a single point of access in the form of a simple priority junction. Consultation with the LHA and the preparation of a Transport Statement/Assessment and Travel Plan (potentially) to support any planning application would be required as further detailed in **Section 7 Next Steps**.



6. Highway Impact Assessment

- 6.1. This section provides a high-level impact assessment setting out the potential percentage change which the development could potentially have on junctions within proximity to the site. It also provides an indication of existing junction capacities in order to determine the suitability of the local highway network to accommodate the proposed development. The assessment has been based on historic publicly available information only at this stage and may require further detailed junction capacity assessment based on updated data and discussion with stakeholders in due course in order to confirm the high-level commentary set out below.
- 6.2. This high-level assessment includes the following junctions:
 - Consented A5013 (Creswell Grove) / Adjacent Site Access (from which this site will be accessed) priority junction; and
 - M6 Junction 14 roundabout (Creswell Interchange).
- 6.3. Base traffic flows have been extracted from the Adjacent site’s (17/27029/FUL) Transport Assessment (TA). The 2022 base flows set out within the TA, were calculated by applying TEMPro growth rates to a Manual Classified Count (MCC) undertaken at the Creswell Interchange, between the hours of 07:30 and 09:30, and 16:30 and 18:30 on 30th March 2017.
- 6.4. The 2022 baseline flows have been extracted from the traffic flow diagrams provided as Figures 28 and 29 provided within the TA prepared to support application 17/27029/FUL.
- 6.5. Additionally, development flows for the adjacent sites (both the full application mentioned above, and outline application 17/27028/OUT) have been extracted from Figures 26 and 27 of the aforementioned TA. The combined 2022 baseline and adjacent site development flows form the anticipated base flows for the proposed development considered within this Note. The adjacent site has been included within the base traffic flows given the proposed development could not be promoted without the progression of the adjacent sites, on the basis that access is required off the adjacent site access road.
- 6.6. It is understood the employment proposals in the adjacent site are comparable to the proposed site. It is therefore considered the agreed distribution for the adjacent site’s employment use would provide a suitable proxy for the proposed development. The site distribution has therefore been based on the distribution set out in Figure 11 of the adjacent site TA, reproduced below for reference.



6.7.

Table 6.1 – Employment Distribution¹

Link	Employment Distribution
Access off A5013 (Creswell Grove)	100%
A5013 Creswell Grove (west of Adjacent Site Access)	11%
A5013 Creswell Grove (east of Adjacent Site Access)	89%
M6 (north of Creswell Interchange)	20%
M6 (south of Creswell Interchange)	38%
A34 (northeast of Creswell Interchange)	20%
A5013 Eccleshall Road (southeast of Creswell Interchange)	12%

- 6.8. The distribution outlined in **Table 6.1** has been applied to the potential trip generation for the site summarised in **Table 5.1** to determine the possible traffic increase on each link in the vicinity of the site as a result of the proposed development.
- 6.9. The proposed development flows have been compared against the baseline flows (2022 base flows plus adjacent site development flows) to assess the percentage change resulting from the proposed development. The percentage increase calculated is for the following scenarios:
 - 2022 Base + 17/27029/FUL + 17/27028/OUT
 - 2022 Base + 17/27029/FUL + 17/27028/OUT + Predicted Trip Generation
- 6.10. **Table 6.2 and 6.3** below outline the percentage impact on the two junctions for each arm of the junctions, for both the AM (08:00–09:00) and PM (17:00–18:00) peaks.

¹ Distribution obtained from Figure 11 of 17/27029/FUL Transport Assessment (Document Reference: STG-BWB-EWE-XX-RP-TA-0001)



Table 6.2 – AM Percentage Increase in Development Traffic Flows on Local Highway Network

Link	2022 Base (incl adjacent sites)	Proposed Development Flows	% Increase
A5013 Creswell Grove (East of Access onto Creswell Grove)	1,303	38	2.8%
A5013 Creswell Grove (West of Access onto Creswell Grove)	1,256	5	0.4%
Access off Creswell Grove	301	42	12.3%
M6 (northbound on slip)	635	3	0.5%
M6 (southbound off slip)	676	5	0.7%
M6 (southbound on slip)	960	7	0.7%
M6 (northbound off slip)	869	9	1.1%
A34 (northeast of Creswell Interchange)	2,443	8	0.3%
A5013 Eccleshall Road (southeast of Creswell Interchange)	1,258	5	0.4%

Table 6.3 – PM Percentage Increase in Development Traffic Flows on Local Highway Network

Link	2022 Base (incl adjacent sites)	Proposed Development Flows	% Increase
A5013 Creswell Grove (East of Access onto Creswell Grove)	1,303	47	3.0%
A5013 Creswell Grove (West of Access onto Creswell Grove)	1,256	6	0.4%
Access off Creswell Grove	301	53	16.6%
M6 (northbound on slip)	635	8	1.4%
M6 (southbound off slip)	676	3	0.6%
M6 (southbound on slip)	960	15	1.6%
M6 (northbound off slip)	869	5	0.5%
A34 (northeast of Creswell Interchange)	2,443	11	0.5%
A5013 Eccleshall Road (southeast of Creswell Interchange)	1,258	6	0.5%



6.11. **Table 6.2 and 6.3** demonstrate that the maximum percentage increase of the development would be on the access junction onto A5013 (Creswell Grove) where the development will have a 12.3% increase and potential impact at this junction link in the AM peak, and 16.6% in the PM peak. This is likely to be considered acceptable given all development trips will utilise this junction and the base flows on this link are low which both contribute to the higher percentage impact. Based on the distribution outlined in **Table 6.2**, the next highest impact of the development (of 2.8% in the AM and 3.0% in the PM) would be on A5013 Creswell Grove (east of the consented development access junction). Beyond Creswell Interchange development traffic will dissipate across the local highway network and would have a negligible impact on existing traffic flows.

6.12. Overall, in both peaks the development will result in an 3% increase in two-way vehicles flows at the A5013 (Creswell Grove)/ access junction and 1% increase at Creswell Interchange. Traffic increases of this volume are unlikely to have a significant impact on the operation of the local highways network however junction capacity assessment work may be required to confirm the existing and future operation of these junctions.

Existing Junction Operation

6.13. Junction modelling was undertaken utilising LinSig in support of adjacent application (ref: 17/27029/FUL). Technical Note ‘STG-BWB-EWE-XX-RP-TAA-0001’, which was provided as an Addendum to the TA supporting the application. This was undertaken in order to demonstrate the future operation of the access, proposed pedestrian crossing and Creswell Interchange within a linked LinSig model after concerns were raised by the LHA regarding queueing back to Creswell Interchange. The modelling includes the proposed mitigation at Creswell Interchange with widening and an increased flare on the eastbound A5013 (Creswell Grove) approach.

6.14. The results of the LinSig modelling have been reproduced below for reference. The results reflect the PRC and delay of Creswell Interchange and Access off A5013 (Creswell Grove) combined.

Table 5.3 – LinSig Modelling Results for Adjacent Site²

Scenario	PRC (%)	Delay (pcu/Hr)
2022 Total Traffic AM Peak	1.3	47.01
2022 Total Traffic AM Peak	16.3	36.65

6.15. This previous modelling indicates Creswell Interchange may already be approaching capacity by 2022 with consideration of the consented sites traffic flows. It is however noted that modelling was based on 2017 traffic count data. Up to date data is therefore required in order to determine whether the predicted traffic growth at the junction has occurred in reality.

² LinSig results obtained from Appendix A of Technical Note ‘STG-BWB-EWE-XX-RP-TAA-0001’.



6.16. The proposed site is anticipated to increase flows at the roundabout by 38 vehicles in the AM peak, and 47 in the PM, which in each peak is equivalent to a 1% total traffic volume increase. Traffic increases of this magnitude are likely to be within the daily variation at a motorway junction and therefore unlikely to cause a significant impact. Detailed discussions with the LHA and National Highways and updated junction capacity assessments may be required in order to determine the potential development impact.



7. SUMMARY

7.1. This Transport Strategy Vision Note has been prepared to provide an initial view on the potential suitability for development on the site with regards to access opportunities of the site, accessibility and development traffic impact.

7.2. It has been demonstrated that the site is suitably located to provide an employment development relative to its location in proximity to existing residential areas and the approved adjacent sites. It is accessible by foot, cycle and public transport.

7.3. An initial preliminary access sketch (drawing P20-3311-TR-SK01 provided as **Appendix C**) has been considered which shows a simple priority junction off the approved adjacent site main road and demonstrates access to the site is achievable. A dedicated pedestrian and cycle access would be provided connecting the site with existing infrastructure on A5013 (Creswell Grove) and the proposed signalised pedestrian crossing which will be delivered in association with the adjacent site.

7.4. A high-level review of existing traffic flows indicates the development could result in a traffic increase of 3% at the adjacent site access and 1% at Creswell Interchange. It is acknowledged that Creswell Interchange has previously been demonstrated by others to be operating at approaching capacity and will be sensitive to further traffic increases however the traffic flows associated with the proposed development are likely to fall within the daily variation of the local highway network and therefore unlikely to cause a significant impact. Small scale mitigation commensurate with the scale of development may need to be considered if detailed junction capacity assessments indicate a development impact further to discussion with the Local Highway Authority and National Highways.

7.5. It should be noted that as part of the development proposals associated with the adjacent applications, the A5013 (Creswell Grove) eastbound approach to Creswell Interchange will be widened to provide two lanes for a distance of approximately 60m, due to the fact that the modelling suggested that this junction was approaching capacity.

7.6. This appraisal has been undertaken based on a site visit and publicly available information without the benefit of discussions with the LHA or NH, land ownership data, highway boundary data, detailed personal injury collision data, up to date traffic surveys or junction capacity assessment modelling. Should the site be progressed, we would recommend scoping discussions are undertaken as early as possible with the LHA and NH in order to seek their view on the access location identified and potential capacity of the local highway network.

7.7. It is concluded that the development could be accommodated in transport terms and could provide a suitable location for development.

Next Steps

7.8. Subsequent to a positive outcome of the initial next step scoping with the LHA and NH set out above we would envisage the site could progress to a planning application and supporting documents could be prepared for the site. From a transport perspective this would include the production of a Transport Scoping Note, and Transport Statement/Assessment and Travel Plan (potentially). The content of which would need to be agreed with the LHA and NH however it is assumed it would consider the following:



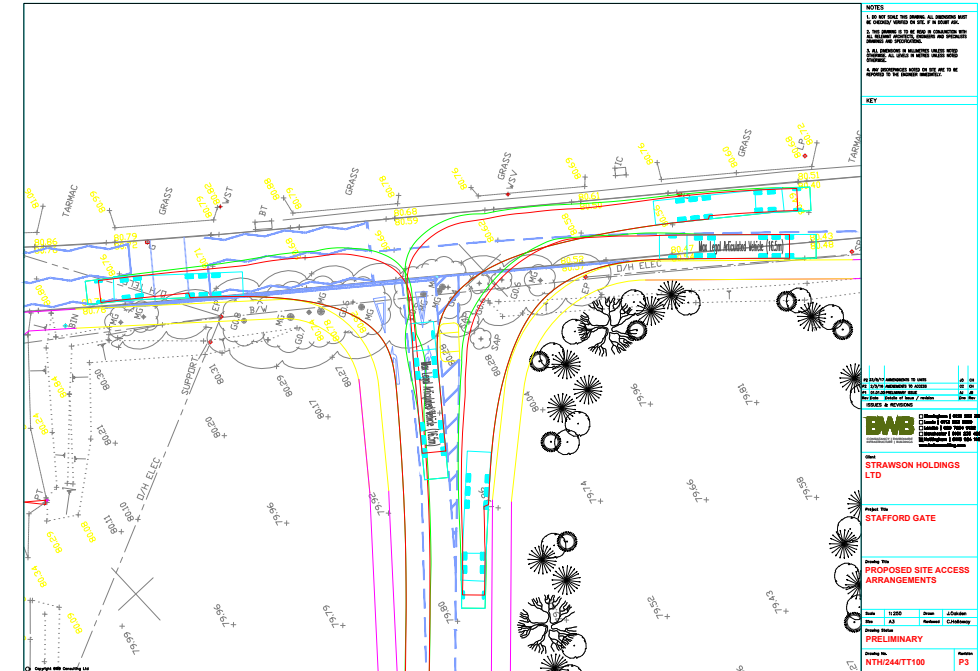
- Opportunities to provide strong connections between the site and surrounding communities by walking, cycling and public transport will be further considered and maximised to allow future employees and visitors to access the site by sustainable modes of travel. A hierarchy of roads and streets within the site will be provided and designed with suitable provision provided for walking and cycling.
- Existing bus infrastructure and provision will be considered, and enhancements will be considered where appropriate and commensurate with the scale of development.
- A review of the local highway network and safety records for the most recent five-year period available in the vicinity of the site;
- Further development of the access strategy based on any additional information gathered, and in consideration of items potentially raised by the local highway authority.
- This preliminary sketch will be progressed (and Safety Audit undertaken where appropriate) during future design development. It will also include swept path assessments for fire appliances, refuse vehicles and HGVs where relevant to confirm the appropriateness of the access proposals and internal highway arrangements.
- Levels and types of parking (vehicular, disabled, motorcycle, cycle and EV) within the site will be confirmed with the LHA, in line with current good practice and local guidance and policies.
- Detailed assessment will be undertaken if necessary of junction capacity at the site access and Creswell Interchange with reference to predicted traffic flows.
- Identification of potential off-site mitigation where considered necessary on the surrounding highway network.

7.9. Appendix B of the DfT Guidance on Transport Assessment (GTA) states that B2 developments over 4,000sqm and B8 developments over 5,000sqm would require a Travel Plan. However, Staffordshire County Council Guidelines for Transport Assessments and Travel Plan (2008) does not refer to Travel Plans for employment sites. The requirement of a Travel Plan will therefore need to be confirmed through discussions with the LHA.

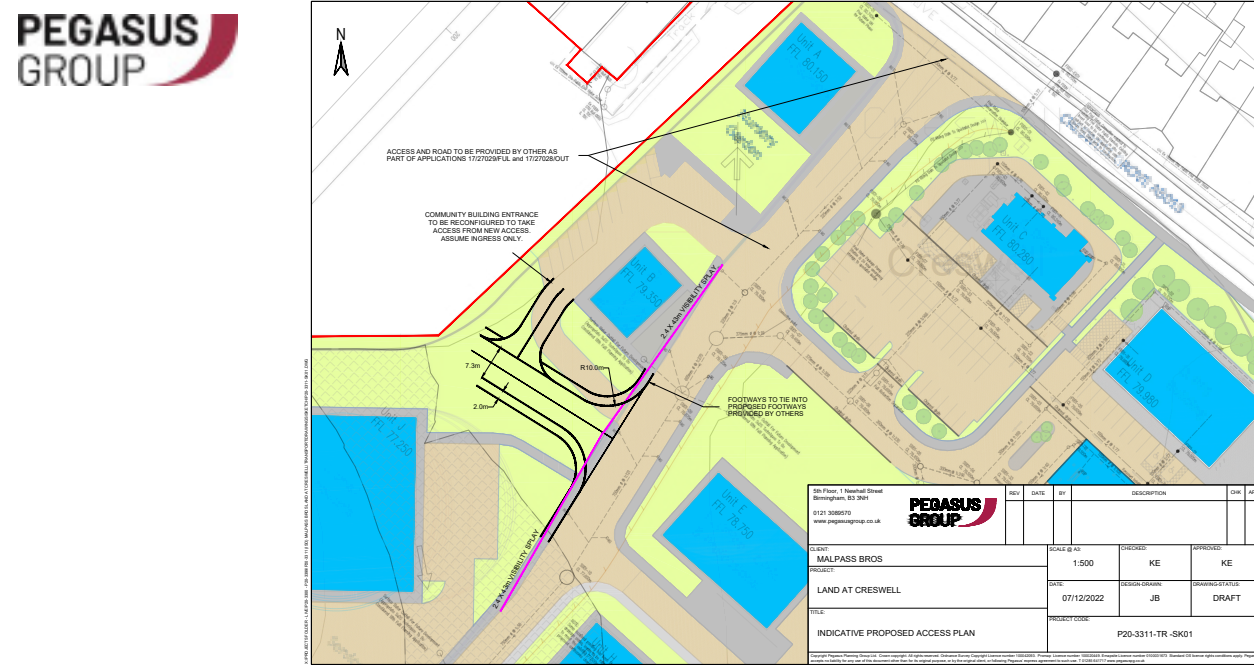
Appendix A – Indicative Masterplan



Appendix B – Approved Adjacent Sites (17/27029/FUL and 17/27028/OUT) Access Junction



Appendix C – Indicative Site Access



Appendix D – TRICS Report



TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use : 02 - EMPLOYMENT
 Category : C - INDUSTRIAL UNIT

TOTAL VEHICLES

Selected regions and areas:

02 SOUTH EAST	HC HAMPSHIRE	2 days
03 SOUTH WEST	DV DEVON	1 days
05 EAST MIDLANDS	DY DERBY	1 days
06 WEST MIDLANDS	WK WARWICKSHIRE	1 days
	WM WEST MIDLANDS	1 days
08 NORTH WEST	AC CHESHIRE WEST & CHESTER	1 days
	EC CHESHIRE EAST	2 days
09 NORTH	CB CUMBRIA	1 days
11 SCOTLAND	SR STIRLING	1 days

This section displays the number of survey days per TRICS® sub-region in the selected set

Primary Filtering selection:

This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.

Parameter: Gross floor area
 Actual Range: 2350 to 9216 (units: sqm)
 Range Selected by User: 2000 to 10000 (units: sqm)

Parking Spaces Range: All Surveys Included

Public Transport Provision:

Selection by: Include all surveys

Date Range: 01/01/14 to 10/11/21

This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.

Selected survey days:

Monday	2 days
Tuesday	2 days
Wednesday	3 days
Thursday	3 days
Friday	1 days

This data displays the number of selected surveys by day of the week.

Selected survey types:

Manual count	11 days
Directional ATC Count	0 days

This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaken using machines.

Selected Locations:

Suburban Area (PPS6 Out of Centre)	3
Edge of Town	7
Neighbourhood Centre (PPS6 Local Centre)	1

This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and Not Known.

Selected Location Sub Categories:

Industrial Zone	9
Development Zone	1
Village	1

This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village, Out of Town, High Street and No Sub Category.

Secondary Filtering selection:

Use Class:
Not Known 11 days

This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order 2005 has been used for this purpose, which can be found within the Library module of TRICS®.

Filter by Site Operations Breakdown:
General Industrial Minimum: 0%

Population within 500m Range:
All Surveys Included
Population within 1 mile:
1,000 or Less 1 days
5,001 to 10,000 4 days
10,001 to 15,000 2 days
15,001 to 20,000 1 days
20,001 to 25,000 1 days
25,001 to 50,000 2 days

This data displays the number of selected surveys within stated 1-mile radii of population.

Population within 5 miles:
5,001 to 25,000 1 days
25,001 to 50,000 1 days
50,001 to 75,000 1 days
75,001 to 100,000 3 days
100,001 to 125,000 1 days
125,001 to 250,000 2 days
250,001 to 500,000 2 days

This data displays the number of selected surveys within stated 5-mile radii of population.

Car ownership within 5 miles:
0.6 to 1.0 2 days
1.1 to 1.5 8 days
1.6 to 2.0 1 days

This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.

Travel Plan:
No 11 days

This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.

PTAL Rating:
No PTAL Present 11 days

This data displays the number of selected surveys with PTAL Ratings.

Covid-19 Restrictions Yes At least one survey within the selected data set was undertaken at a time of Covid-19 restrictions

LIST OF SITES relevant to selection parameters

Site ID	Code	Category	Location	Area (sqm)	Survey Date	Survey Type
1	AC-02-C-02	INDUSTRIAL MATERIALS	CHESHIRE WEST & CHESTER	8100	19/11/14	MANUAL
<p>JUPITER DRIVE CHESTER CHESTER W. EMP. PARK Edge of Town Industrial Zone Total Gross floor area: 8100 sqm Survey date: WEDNESDAY 19/11/14</p>						
2	CB-02-C-01	DOMINO'S PIZZA	CUMBRIA	2950	10/06/14	MANUAL
<p>COWPER ROAD PENRITH GILWILLY IND. ESTATE Edge of Town Industrial Zone Total Gross floor area: 2950 sqm Survey date: TUESDAY 10/06/14</p>						
3	DY-02-C-02	ENERGY RECOVERY FACILITY	DEVON	3513	06/07/17	MANUAL
<p>GRACE ROAD SOUTH EXETER MARSH BARTON TRAD. EST. Suburban Area (PPS6 Out of Centre) Industrial Zone Total Gross floor area: 3513 sqm Survey date: THURSDAY 06/07/17</p>						
4	DY-02-C-01	ENGINEERED PRODUCTS	DERBY	2600	25/06/15	MANUAL
<p>PONTEFRAC STREET DERBY Suburban Area (PPS6 Out of Centre) Industrial Zone Total Gross floor area: 2600 sqm Survey date: THURSDAY 25/06/15</p>						
5	EC-02-C-01	OFFICE FURNITURE	CHESHIRE EAST	6658	19/09/16	MANUAL
<p>BRUNEL ROAD MACCLESFIELD LYME GREEN BUS. PARK Edge of Town Development Zone Total Gross floor area: 6658 sqm Survey date: MONDAY 19/09/16</p>						
6	EC-02-C-02	FABRICS MANUFACTURE	CHESHIRE EAST	3200	07/05/21	MANUAL
<p>CHARTER WAY MACCLESFIELD HURDSFIELD Edge of Town Industrial Zone Total Gross floor area: 3200 sqm Survey date: FRIDAY 07/05/21</p>						
7	HC-02-C-01	ENGINEERING COMPANY	HAMPSHIRE	3000	16/06/16	MANUAL
<p>JAYS CLOSE BASINGSTOKE Edge of Town Industrial Zone Total Gross floor area: 3000 sqm Survey date: THURSDAY 16/06/16</p>						

LIST OF SITES relevant to selection parameters (Cont.)

Site ID	Code	Category	Location	Area (sqm)	Survey Date	Survey Type
8	HC-02-C-02	GIN DISTILLERY	HAMPSHIRE	8000	09/05/18	MANUAL
<p>LONDON ROAD LAVERSTOKE Neighbourhood Centre (PPS6 Local Centre) Village Total Gross floor area: 8000 sqm Survey date: WEDNESDAY 09/05/18</p>						
9	SR-02-C-01	SPECIALIST MODEL MAKING	STIRLING	2350	16/06/14	MANUAL
<p>BORROWMEADOW ROAD STIRLING Edge of Town Industrial Zone Total Gross floor area: 2350 sqm Survey date: MONDAY 16/06/14</p>						
10	WK-02-C-01	MACHINE ENGINEERING	WARWICKSHIRE	9216	10/11/21	MANUAL
<p>CASTLE MOUND WAY RUGBY Edge of Town Industrial Zone Total Gross floor area: 9216 sqm Survey date: WEDNESDAY 10/11/21</p>						
11	WM-02-C-04	FOUNDRY	WEST MIDLANDS	4324	21/11/17	MANUAL
<p>STOURVALE ROAD STOURBRIDGE LYE Suburban Area (PPS6 Out of Centre) Industrial Zone Total Gross floor area: 4324 sqm Survey date: TUESDAY 21/11/17</p>						

This section provides a list of all survey sites and days in the selected set. For each individual survey site, it displays a unique site reference code and site address, the selected trip rate calculation parameter and its value, the day of the week and date of each survey, and whether the survey was a manual classified count or an ATC count.

TRIP RATE for Land Use 02 - EMPLOYMENT/C - INDUSTRIAL UNIT
TOTAL VEHICLES
Calculation factor: 100 sqm
BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00	3	5122	0.085	3	5122	0.000	3	5122	0.085
06:00 - 07:00	4	4429	0.062	4	4429	0.006	4	4429	0.068
07:00 - 08:00	11	4901	0.284	11	4901	0.046	11	4901	0.330
08:00 - 09:00	11	4901	0.310	11	4901	0.048	11	4901	0.358
09:00 - 10:00	11	4901	0.193	11	4901	0.111	11	4901	0.304
10:00 - 11:00	11	4901	0.156	11	4901	0.093	11	4901	0.249
11:00 - 12:00	11	4901	0.082	11	4901	0.093	11	4901	0.175
12:00 - 13:00	11	4901	0.145	11	4901	0.163	11	4901	0.308
13:00 - 14:00	11	4901	0.141	11	4901	0.213	11	4901	0.354
14:00 - 15:00	11	4901	0.083	11	4901	0.108	11	4901	0.191
15:00 - 16:00	11	4901	0.054	11	4901	0.139	11	4901	0.193
16:00 - 17:00	11	4901	0.035	11	4901	0.247	11	4901	0.282
17:00 - 18:00	11	4901	0.041	11	4901	0.200	11	4901	0.241
18:00 - 19:00	11	4901	0.030	11	4901	0.124	11	4901	0.154
19:00 - 20:00	4	5842	0.039	4	5842	0.039	4	5842	0.078
20:00 - 21:00	4	5842	0.017	4	5842	0.086	4	5842	0.103
21:00 - 22:00	1	8000	0.000	1	8000	0.000	1	8000	0.000
22:00 - 23:00									
23:00 - 24:00									
Total Rates:		1.757			1.716			3.473	

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.

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Parameter summary

Trip rate parameter range selected:	2350 - 9216 (units: sqm)
Survey date date range:	01/01/14 - 10/11/21
Number of weekdays (Monday-Friday):	11
Number of Saturdays:	0
Number of Sundays:	0
Surveys automatically removed from selection:	0
Surveys manually removed from selection:	0

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

Calculation Reference: AUDIT-563501-221129-1104

TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use : 02 - EMPLOYMENT
Category : F - WAREHOUSING (COMMERCIAL)

TOTAL VEHICLES

Selected regions and areas:

02 SOUTH EAST	
BO BEDFORD	1 days
HC HAMPSHIRE	1 days
04 EAST ANGLIA	
SF SUFFOLK	1 days
06 WEST MIDLANDS	
WM WEST MIDLANDS	1 days
10 WALES	
BG BRIDGEND	1 days
11 SCOTLAND	
LO WEST LOTHIAN	1 days

This section displays the number of survey days per TRICS® sub-region in the selected set

Primary Filtering selection:

This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.

Parameter:	Gross floor area
Actual Range:	3050 to 5855 (units: sqm)
Range Selected by User:	2000 to 10000 (units: sqm)

Parking Spaces Range: All Surveys Included

Public Transport Provision:

Selection by: Include all surveys

Date Range: 01/01/14 to 27/09/21

This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.

Selected survey days:

Monday	3 days
Tuesday	1 days
Thursday	1 days
Friday	1 days

This data displays the number of selected surveys by day of the week.

Selected survey types:

Manual count	6 days
Directional ATC Count	0 days

This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaken using machines.

Selected Locations:

Edge of Town	6
--------------	---

This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and Not Known.

Selected Location Sub Categories:

Industrial Zone	4
Commercial Zone	1
Residential Zone	1

This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village, Out of Town, High Street and No Sub Category.

Secondary Filtering selection:

<u>Use Class:</u>	
B8	6 days

This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order 2005 has been used for this purpose, which can be found within the Library module of TRICS®.

Filter by Site Operations Breakdown:

All Surveys Included

Population within 500m Range:

All Surveys Included	
<u>Population within 1 mile:</u>	
1,000 or Less	1 days
1,001 to 5,000	1 days
5,001 to 10,000	2 days
10,001 to 15,000	1 days
25,001 to 50,000	1 days

This data displays the number of selected surveys within stated 1-mile radii of population.

Population within 5 miles:

5,001 to 25,000	1 days
50,001 to 75,000	1 days
75,001 to 100,000	1 days
125,001 to 250,000	2 days
500,001 or More	1 days

This data displays the number of selected surveys within stated 5-mile radii of population.

Car ownership within 5 miles:

0.6 to 1.0	1 days
1.1 to 1.5	5 days

This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.

Travel Plan:

No	6 days
----	--------

This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.

PTAL Rating:

No PTAL Present	6 days
-----------------	--------

This data displays the number of selected surveys with PTAL Ratings.

Covid-19 Restrictions	Yes	At least one survey within the selected data set was undertaken at a time of Covid-19 restrictions
-----------------------	-----	--

LIST OF SITES relevant to selection parameters

1 BG-02-F-01	LOGISTICS COMPANY	BRIDGEND
PARC CRESCENT BRIDGEND WATERTON IND. EST. Edge of Town Industrial Zone Total Gross floor area: 3050 sqm Survey date: MONDAY 13/10/14 Survey Type: MANUAL		
2 BO-02-F-01	DRINKS WHOLESALER	BEDFORD
CAMBRIDGE ROAD BEDFORD Edge of Town Industrial Zone Total Gross floor area: 3500 sqm Survey date: THURSDAY 15/10/20 Survey Type: MANUAL		
3 HC-02-F-03	PPE DISTRIBUTION	HAMPSHIRE
WARSASH ROAD PARK GATE Edge of Town Industrial Zone Total Gross floor area: 3665 sqm Survey date: MONDAY 27/09/21 Survey Type: MANUAL		
4 LO-02-F-01	LOGISTICS SERVICE	WEST LOTHIAN
ARMADALE Edge of Town Residential Zone Total Gross floor area: 5855 sqm Survey date: TUESDAY 08/06/21 Survey Type: MANUAL		
5 SF-02-F-03	ROAD HAULAGE	SUFFOLK
CENTRAL AVENUE IPSWICH WARREN HEATH Edge of Town Industrial Zone Total Gross floor area: 4700 sqm Survey date: FRIDAY 18/09/15 Survey Type: MANUAL		
6 WM-02-F-02	LOGISTICS FIRM	WEST MIDLANDS
SOVEREIGN ROAD BIRMINGHAM KINGS NORTON Edge of Town Commercial Zone Total Gross floor area: 3625 sqm Survey date: MONDAY 09/11/15 Survey Type: MANUAL		

This section provides a list of all survey sites and days in the selected set. For each individual survey site, it displays a unique site reference code and site address, the selected trip rate calculation parameter and its value, the day of the week and date of each survey, and whether the survey was a manual classified count or an ATC count.

TRIP RATE for Land Use 02 - EMPLOYMENT/F - WAREHOUSING (COMMERCIAL)
TOTAL VEHICLES
Calculation factor: 100 sqm
BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00	2	4678	0.086	2	4678	0.011	2	4678	0.097
06:00 - 07:00	2	4678	0.160	2	4678	0.064	2	4678	0.224
07:00 - 08:00	6	4066	0.283	6	4066	0.148	6	4066	0.431
08:00 - 09:00	6	4066	0.287	6	4066	0.201	6	4066	0.488
09:00 - 10:00	6	4066	0.160	6	4066	0.164	6	4066	0.324
10:00 - 11:00	6	4066	0.271	6	4066	0.180	6	4066	0.451
11:00 - 12:00	6	4066	0.225	6	4066	0.180	6	4066	0.405
12:00 - 13:00	6	4066	0.197	6	4066	0.156	6	4066	0.353
13:00 - 14:00	6	4066	0.225	6	4066	0.180	6	4066	0.405
14:00 - 15:00	6	4066	0.209	6	4066	0.180	6	4066	0.389
15:00 - 16:00	6	4066	0.238	6	4066	0.357	6	4066	0.595
16:00 - 17:00	6	4066	0.225	6	4066	0.258	6	4066	0.483
17:00 - 18:00	6	4066	0.160	6	4066	0.455	6	4066	0.615
18:00 - 19:00	6	4066	0.102	6	4066	0.238	6	4066	0.340
19:00 - 20:00	2	4678	0.011	2	4678	0.043	2	4678	0.054
20:00 - 21:00	2	4678	0.000	2	4678	0.021	2	4678	0.021
21:00 - 22:00	1	5855	0.034	1	5855	0.017	1	5855	0.051
22:00 - 23:00	1	5855	0.000	1	5855	0.000	1	5855	0.000
23:00 - 24:00									
Total Rates:			2.873			2.853			5.726

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.

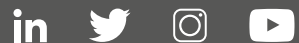
The survey data, graphs and all associated supporting information, contained within the TRICS Database are published by TRICS Consortium Limited ("the Company") and the Company claims copyright and database rights in this published work. The Company authorises those who possess a current TRICS licence to access the TRICS Database and copy the data contained within the TRICS Database for the licence holders' use only. Any resulting copy must retain all copyrights and other proprietary notices, and any disclaimer contained thereon.

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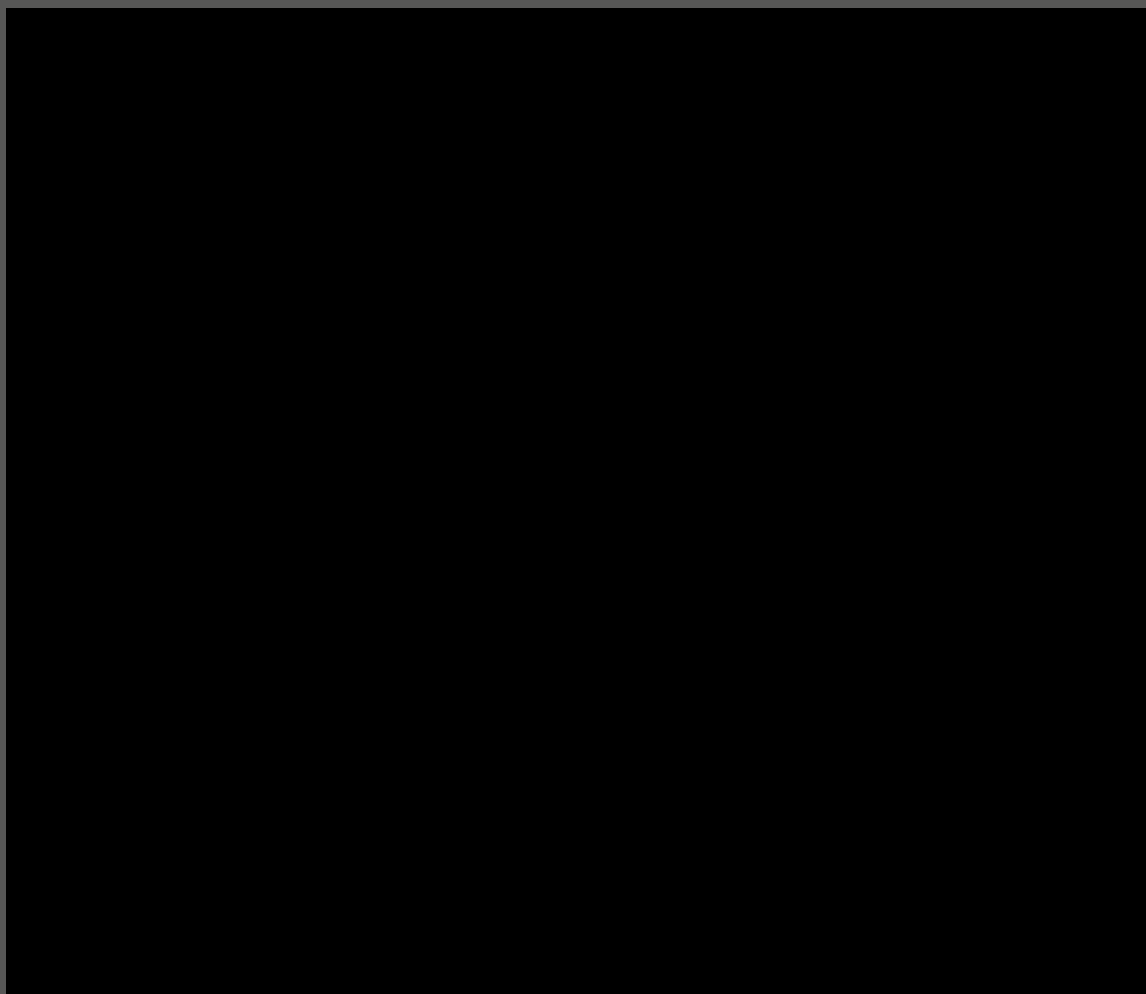
Parameter summary

Trip rate parameter range selected: 3050 - 5855 (units: sqm)
 Survey date date range: 01/01/14 - 27/09/21
 Number of weekdays (Monday-Friday): 6
 Number of Saturdays: 0
 Number of Sundays: 0
 Surveys automatically removed from selection: 0
 Surveys manually removed from selection: 0

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are show. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.



OUR OFFICES



From: Keith Fenwick [REDACTED]
Sent: 01 December 2022 13:16
To: Strategic Planning Consultations
Cc: [REDACTED]
Subject: Stafford Borough Local Plan 2020-2040 Preferred Options: Consultation Form, Representations, Vision Document
Attachments: Stafford Local Plan Reg 18 Dec 2022 - Hixon-Reps-Consultation Response Form FINAL SUBMITTED.pdf; Stafford Local Plan Reg 18 Dec 2022 - Hixon Reps - P21-2822PL FINAL.pdf; P21-2822_02 Vision Document FINAL 220422 LR.pdf

Dear Strategic Planning team,

Please find attached representations in respect of the ongoing Regulation 18 consultation for the Stafford Borough Local Plan. Please confirm safe receipt.

Kind Regards

Keith Fenwick
Senior Director

[REDACTED]
[REDACTED]
[REDACTED]



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Contact Details

Full name (required): Keith Fenwick

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

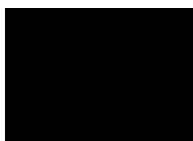
Organisation or Company Name (if applicable): Pegasus Group

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:

Please see attached statement

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?

No

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

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

Local Plan Preferred Options document reference: Pages 41 to 45

Comments:

Please see attached statement

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.)

No

Policy 12 Comments:

Please see attached statement

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

The policies which relate to these proposals are listed below.

Do you agree with the proposed allocations?

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

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

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

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

Policy 13. Local Green Space

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

Yes / No

Policy 13 Comments:

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

Yes / No

Policy 14 Comments:

Policy 15. Stone Countryside Enhancement Area

Yes / No

Policy 15 Comments:

Economy Policies

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

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

The relevant policies are: 16, 17 and 18.

Do you agree with these policies?

Yes / No

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

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

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

Local Plan Preferred Options document reference: pages 61 to 65

Comments:

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

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

Do you agree with these policies?

Yes / No

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

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

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

Local Plan Preferred Options document reference: pages 65 to 71

Comments:

Housing Policies

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

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

Do you agree with this policy?

Yes / No

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

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

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

Local Plan Preferred Options document reference: pages 74 to 76

Comments:

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

Do you agree with this policy?

Yes / No

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

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

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

Local Plan Preferred Options document reference: pages 84 to 86

Comments:

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

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

Do you agree with these policies?

Yes / No

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

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

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

Local Plan Preferred Options document reference: pages 73 to 89

Comments:

Design and Infrastructure Policies

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

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

Do you agree with these policies?

Yes / No

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

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

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

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

Comments:

Environment Policies

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

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

Do you agree with these policies?

Yes / No

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

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

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

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

Comments:

Connections

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

The relevant policies are: 52 and 53

Do you agree with these policies?

Yes / No

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

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

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

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

Comments:

Evidence Base

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

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

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

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

Yes / No

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

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

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

Comments:

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

Yes / No

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

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

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

Comments:

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.

Sustainability Appraisal – Detailed commentary is made with regard to both the content of and the application of the findings of the interim Sustainability Appraisal. Please see attached statement

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

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

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

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

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

'PREFERRED OPTIONS' REG 18 RESPONSE

**STAFFORD BOROUGH LOCAL PLAN 2020–2040:
PREFERRED OPTIONS**

LAND TO SOUTH OF NEW ROAD, HIXON

On behalf of R&J Sutton & Langtry Developments Ltd

TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
PLANNING AND COMPULSORY PURCHASE ACT 2004

Date: December 2022 | Pegasus Ref: P21-2822PL

Author: Keith Fenwick MRTPI



Document Management.

Version	Date	Author	Checked/ Approved by:	Reason for revision
FINAL	01/12/22	KF	SB	



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Appendix 3: OS Historic Mapping.....	



1. Introduction

- 1.1. These representations respond to the 'Preferred Options' (Regulation 18) consultation document and accompanying published evidence base, for the Stafford Borough Local Plan 2020 – 2040 Preferred Options (the **emerging Local Plan** or **the Plan**), having regard to both the national and local planning policy context. These representations are made by Pegasus Group on behalf of R & J Sutton & Langtry Developments Ltd (the **Owner**) and relate to their land interest at Land to the South of New Road, Hixon (the **Site**) which they are the sole owners of. The Site is addressed as site **HIX 20** in the emerging Local Plan evidence base. The Site is, in part at least, a brownfield site having previously been occupied by airfield concrete 'aprons' associated with the adjacent Hixon Airfield site, the remnants of which are still clearly visible on the ground.
- 1.2. Representations promoting the land interests of the Owner have previously been made to the Borough Council following the Council's Call for Sites process. This has included the submission of a Vision Document for the site, setting out the merits of Hixon as a sustainable location for growth, and the merits of the site, as a sustainable, visually and physically self-contained and limited development parcel adjoining the settlement.
- 1.3. With regards to the Site these representations should be read alongside the accompanying:
 - Site Location Plan (**Appendix 1**)
 - Vision Statement (**Appendix 2**)
 - OS Historic Mapping (**Appendix 3**)
- 1.4. 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 2021 (**NPPF**) ¶135. 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.
- 1.5. These representations also give consideration to the legal and procedural requirements associated with the Plan-making process.



- 1.6. Importantly, whilst the Owner welcomes and supports Stafford Borough Council's full update of the Borough's Local Plan, they raise concerns related to;
- the consistency of the proposed strategic distribution of housing growth against both the NPPF and the Council's own Sustainability Appraisal (**SA**), specifically with regard to the Urban Area/Rural area balance, and the Settlement Assessment (**Policy 2**)
 - the deliverability projections of Meecebrook Garden Community (**Policy 7**)
 - the opaque nature of elements of the Site Selection methodology, as set out in the associated Topic Paper (**Policy 12**)
 - the accuracy of the detailed assessment of the Site, against the evidence which was before the Council, and which has resulted in HIX 20 not being considered as a 'Stage 4' site (**Sustainability Appraisal et al**)
- 1.7. These representations consider that there are elements of the emerging Local Plan which are unsound when considered against NPPF ¶135, and that a further meaningful review of the allocation strategy is required to address the issues identified, in order that the Plan can be found sound.



2. Planning Policy Context

- 2.1. The Owner supports Stafford Borough Council in undertaking a full update of the Borough Local Plan. This provides the 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 National Planning Policy Framework (NPPF 2021) requires local planning authorities to keep policies in their Local Plans up to date by undertaking a review at least once every five years. The proposed timescales, as set out in the Local Development Scheme, will ensure that an up-to-date Local Plan for the District will be in place to support growth and meet future development needs.
- 2.3. The Preferred Options consultation follows previous consultations on the Local Plan and identifies a draft spatial strategy with the identification of housing and employment delivery, whilst also identifying strategic objectives and priorities through numerous policies in relation to transport, the natural and historic environment and the health of communities. The current consultation document represents a statement of the Borough's currently preferred direction of policy in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), having considered previous representations and the evidence base.
- 2.4. It is important for the planning authority to acknowledge that at this stage in the plan making process matters are not inexorably fixed. In order for the consultation to be robust, where genuine issues are identified through examination of the evidence base, and/or where factual errors are highlighted, there must be an 'open mind' as to a meaningful review of the approach being adopted.
- 2.5. Within the above context, the Owner supports the Council's proactive approach in undertaking a full update of the Local Plan to ensure that a current 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. The Vision for the Borough is fairly simplistic; 'A *prosperous and attractive borough with strong communities.*'
- 3.2. As such, whilst the Vision as far as it goes, is supported, it is the matters missing from the Vision, and how the Vision is delivered through the Plan's Objectives, and Development Strategy, which is the subject of concern, and whether those Objectives are mutually compatible with each other, and/or the Vision, or whether they reflect any local specific context ie what is it about this Vision which is unique or special to Stafford Borough?
- 3.3. Neither the Vision nor the objectives seek to tackle head on, key issues including delivery of affordable housing, the Urban/Rural split of the Borough (and how that might require differing plan objectives) or the challenges of being a Green Belt authority.
- 3.4. The spatial portrait describes the Borough as being 'predominantly rural' (Plan pg 14), however the growth strategy is one which focusses heavily on the principle urban area of Stafford. This accounts for only 48% of the Borough's population (and including the other main town of Stone, only 60%), meaning that some 40% of the Borough's population, resides outside the two main towns. How the Vision of achieving prosperous, attractive and strong rural communities is to be translated through the Plan's objectives into policy, is currently absent.
- 3.5. So, whilst the plan identifies at pg 16 the key issues of the Borough being; delivering sustainable growth, affordable housing, demographic change (ie an aging population), sustaining an attractive natural and built environment, responding to climate change, reducing the need to travel and accessing rural services/facilities, regenerating towns and villages – the issues of affordability, demographic change and rural accessibility, are not visible as matters within the objectives of the Plan, nor is it clear where these sit within the simplistic Vision for the Borough.
- 3.6. Whilst the Objectives are noted as not being ordered in any sense of priority, perhaps there ought to be some understanding established by the Plan, as to which Objectives are considered the most important, which are driving the spatial strategy, and why. For example, is the objective of developing an innovative economy, as important as mitigating and adapting to climate change, and if so why? The division of Objectives into those which are seen as strategically critical, as opposed to desirable, would be beneficial.
- 3.7. It is considered that the Plan could be strengthened through the introduction of a more clearly established set of Strategic Objectives, with greater clarity on how they will be delivered, to provide a more distinct and Borough specific overarching framework from which the delivery policies can flow.
- 3.8. NPPF ¶17 and ¶21 require that Local Plans must include '*strategic policies*' and that, '*plans should make explicit which policies are strategic policies*', with ¶20 setting out the list of matters which matters must be addressed by the plan's strategic policies under the themes of housing, infrastructure, community, natural and built environments. The clarity and explicit identification of the strategic plan policies which meet the plan objectives, and deliver the plan Vision, is absent from the emerging Local Plan. This needs to be addressed in order to make the plan Sound by dint of being consistent with national policy.



4. Development Strategy and Climate Change Response

Policy 1. Development Strategy

General comments

- 4.1. The development strategy sets out that during the plan period 2020 to 2040 the Council will deliver 10,700 new homes; 8,700 to meet local housing need and 2,000 towards meeting the Greater Birmingham and Black County Housing Market Area (GBBCHMA) shortfall. For clarity, the policy should state in terms, that this is a 'minimum' requirement, and that the 10,700 does not represent a ceiling figure (a point already inherently recognised, by the identification of sites to accommodate 12,580 homes in total).
- 4.2. Overall, the housing requirement figure is compiled of the following component parts;
- | | |
|---------------------------------------|----------|
| Standard Methodology (LHN) | 391dw/yr |
| Jobs based additionality | 44dw/yr |
| Unmet need from neighbouring Councils | 100dw/yr |
- Total requirement = 535dw/yr
- 4.3. This gives a Plan requirement of 10,700dw, and the plan has 'identified' sites for delivery of 12,580 homes ie a 17.5% supply buffer. The approach of identifying a suitable buffer to ensure delivery of Stafford's housing need as a minimum figure is supported. It is welcomed that the Council recognise that whilst the Standard Methodology is a starting point to assessing their housing requirement, the Standard Method should be seen as the minimum housing need.
- 4.4. Historically, the Council have delivered housing at a 10-year average (2011-2021) of 600dpa, thus demonstrating that there have been no overriding constraints to delivery, and that provision above the Standard Methodology figure for Local Housing Need (LHN) is achievable. Indeed 'market signals' demonstrate that delivery at this level is sustainable in terms of demand. Moreover, the framework for economic growth envisaged by both the Plan's Vision and Objectives, along with the recognised need to accommodate a sufficient economically active workforce to meet the needs arising from projected economic growth (EHDNA 2020), further support the 'market signals' and the need to plan for growth in excess of the LHN figure.
- 4.5. Delivery of affordable housing, as a component of overall housing delivery, is also a driver for ensuring some additionality to the overall Stafford Borough LHN figure. The affordable housing need in the Borough is significant at between 65% to 99% of the total LHN figure (252 homes to 389 homes). With Affordable Housing delivery policy requiring between 10% and 40% delivery of affordable units across the Borough's new housing sites, it is inevitable that the known affordable housing need will not be addressed in full by new development. However, an uplift to the LHN is undoubtedly justified to support an increased delivery figure for those in need of affordable housing.



- 4.6. Finally, support is provided for the recognition of the need for Stafford to address the unmet needs of neighbouring authorities under the 'Duty to Cooperate'. However, it is noted that at only a provision of 2,000 homes to meet the unmet needs of neighbouring authorities, this only looks to address the requirements of the Black Country, and does not address any of the unmet needs, inter alia, of Birmingham City. It is considered therefore, that additional work should be undertaken to establish the additionality of fully addressing the appropriate proportion of the unmet needs of neighbouring authorities.

Spatial Distribution

- 4.7. Objection to the Soundness of the Plan's spatial distribution of housing, as set out at section E of Policy 1, is raised. Specifically, it is commented that the distribution proposed, seeks to over rely on delivery of housing within the main towns of Stafford/Stone and the Meecebrook Garden Community.
- 4.8. It is considered that the distribution strategy, neither flows from the evidence base, nor will assist in delivering against the Plan's Vision or Objectives.
- 4.9. The Settlement Topic Paper (Section 5) identifies that of the Borough's 136,800 population (LP page 14), some 65,716 (48%) live in Stafford, and 16,385 (12%) in Stone. This means that 40% of the Borough's population, live in the villages, Large and Smaller, outside of the Main Towns.
- 4.10. The Plan, however, seeks to focus less than 4.5% of the Plan period's housing growth to the Large settlements (4%) and Smaller settlements/Rural areas (0.5%). Whilst it is acknowledged and understood that an urban focus will deliver some sustainability advantages in terms of proximity to higher order shops and services etc, this cannot represent a sustainable development strategy when it delivers what amounts to a near embargo on the local housing needs of 40% of the Borough's population. Such an approach is unlikely to deliver on the plan's Vision to achieve '*strong communities*' or meet the objectives of delivering '*sustainable housing growth, supported by accessible services and facilities.*'
- 4.11. The implications for those households who have grown up in rural communities, and who wish to stay local to their roots, families, and social networks, is that their needs are not accommodated by this Plan. They will need to look at new housing within the main towns to meet their needs, and that seems to conflict with the Vision and Objectives as noted above. It exacerbates social exclusion from rural communities and does nothing to address or meet the affordable housing requirements of those communities. The spatial distribution is considered unsound on the grounds of neither being positively prepared nor justified.



5. Meecebrook Garden Community

Policy 7. Meecebrook site allocation

- 5.1. There is no objection raised to the principle of the allocation of land at the Meecebrook Garden Community. However, concern is raised as to both the soundness of the assumptions underlying the proposed trajectory of the delivery from the site during the plan period, and the implication that if Meecebrook is not brought forward, that the Borough would 'reassess' the quantum of unmet needs from neighbouring authorities that it would meet.
- 5.2. Dealing firstly with the assumptions on delivery trajectory, Sir Oliver Letwin's Independent Review of Build Out [rates] of large sites in 2018 (Final Report), concluded that for large sites, the average build-out rate was at 6.5%/year. At Meecebrook, this would equate to just under a 200homes/year build out rate, for a 3,000-home scheme.
- 5.3. Without any specific evidence provided to justify why delivery would be at rate significantly in excess of industry 'norms', as reflected by the evidence within the Letwin report, then an assumption that the site would deliver at over 200homes/year is considered unsound. Delivering at only 2,000 homes during the plan period, rather than the assumed 3,000 would therefore, result in some 1,000 additional homes currently assumed to be being delivered during the plan period, needing to be identified and allocated elsewhere.
- 5.4. The second point with regard to Meecebrook, is related to the commentary at para 1.4 of the plan that; *"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."*
- 5.5. Such an approach is unsound and clearly does not provide an 'Effective' Local Plan. If Meecebrook is not able to deliver the planned 3,000 homes during the plan period, that does not mean that the unmet need from Neighbouring authorities ceases to exist or can be ignored, rather it requires an alternative spatial strategy to be proposed which is capable of delivering the required housing, within an overarching sustainable development framework.
- 5.6. Moreover, given that of the 3,000 homes proposed at Meecebrook, only 2,000 of these are to address unmet need from the Black Country, then 1,000 of the assumed provision is to meet the Borough's own needs. If the trajectory assumptions above (ie 200homes/year) are correct, and Meecebrook's planned delivery is only some 2,000 homes during the plan period, there will still be a requirement to address the 1,000 homes which are meeting the Borough's own needs, elsewhere within the plan area.



6. Site Allocation Policies

Policy 12. Other housing and employment land allocations

Overview

- 6.1. Objection is raised to the soundness of Policy 12 with regard to how it has interpreted the delivery of the spatial strategy to achieve the Vision and Objectives of the Plan as established at page 12 therein. The plan is considered to be unsound in terms of not being sufficiently justified, effective nor consistent with national policy.
- 6.2. Outside of the two main settlements of Stafford and Stone and the Garden Community proposal, the only settlements which are proposed to deliver housing are at Gnosall (109 homes) and Woodseaves (125 homes). In effect, 134 homes are proposed to address the needs of the 40% of the population which currently reside outside of the two main settlements.
- 6.3. This approach to addressing the requirements of the rural areas will neither deliver on the Vision of creating strong communities nor provide for sustainable housing growth within the rural areas. Moreover, such an approach is neither necessitated nor supported by the evidence base – far from it.
- 6.4. The interim Sustainability Appraisal Report (October 2022) (**SA**) which accompanies the production of the preferred options makes it clear that the Plan should make provision for a more varied supply of housing land and sites. Specifically, at ¶5.2.59 of the SA when concluding on the broad distribution options arising from earlier consultation, the SA identifies some of the key messages which emerged.
- 6.5. Whilst providing support for the arguments for large strategic schemes such as Meecebrook, this was importantly caveated with a recognition of a specific *"...need to support a mix of sites, and a degree of dispersal (mindful of the settlement hierarchy), in order to ensure a robust housing supply trajectory (thereby maintaining a 5 year Housing Land Supply) and that local housing needs are met."* (SA 5.2.59).
- 6.6. The SA goes on to note that there is a need to focus on individual settlements as a *'key geography'* and the need to consider settlement clusters well linked to Stafford which may share services and facilities and work within transport corridors, where there are good public transport services.
- 6.7. The same paragraph goes further to identify the *'clear need'* to make best use of previously developed land aligning with wider objectives including high quality placemaking.
- 6.8. There are a number of messages contained within the SA, none of which appear to have been transposed into the chosen settlement strategy as being proposed through the Preferred Options.
- 6.9. Those messages include the fact that there needs to be recognition of the requirement to provide some form of dispersal strategy to ensure that local housing needs are being met outside of the main settlements, and that the strategy has to have a regard to *'key geography'*, i.e. it can't all simply be delivered in a single or couple of locations, but rather it needs to have regard to a more widespread delivery to ensure that the wider local housing needs in rural



communities are being met. Such an approach is also required by the NPPF ¶179, which confirms that in order to promote sustainable development in rural areas, housing should 'be located where it will enhance or maintain the vitality of rural communities.' Planning policies, it is stated, 'should identify opportunities for villages to grow and thrive.'

- 6.10. There are further messages that the selected strategy to deliver that dispersal should have regard to, and this includes the availability of services within those villages. It is noteworthy that Hixon performs most strongly of the large settlements identified at Tier four of the Council's hierarchy, but without any allocation of housing to 2040. Moreover, settlements well served on transport corridors or with public transport (as Hixon is, and as recognised in the Council's own Settlement Assessment) would be key locations to address that need.
- 6.11. Finally, there is clear messaging that the use of previously developed land where it is available should be identified as a clear need of the Plan. Section 7 below addresses some of these matters with regard to Hixon's settlement sustainability and the brownfield element of the subject site. Suffice to say here that the failure to identify any development within Hixon as part of a Local Plan with an end date of 2040, appears wholly incompatible with the messaging arising through earlier consultations and through the interim SA. It is indicative of the failure of the Plan to provide a spatial strategy consistent with its own Vision and Objectives as supported through the evidence base.
- 6.12. As noted at ¶4.5 above, the affordable housing needs of the Borough are very significant, indeed so much so this is used as a supporting argument for delivery of housing above local housing needs levels. However, the Preferred Options spatial strategy does little to meet the affordable housing needs of rural communities in locations where it is most necessary, ie. within the individual settlements. The SA explored how higher order large settlements might act as a 'cluster settlements' to meet the needs of a wider rural hinterland. Such an approach would lend support to a proposed strategy, whereby the larger of the Tier 4 settlements which scored highest through the settlement assessment would help meet the affordable housing need through allocation of residential development sites which would provide a proportionate amount of affordable housing.
- 6.13. The SA ¶9.10.6 provides further support for the identification of small and medium size sites within the Plan as part of an overarching strategy, because they have the benefit of being associated with relatively low delivery risk, and the potential to come forward early in the plan. This is especially important where the Plan is reliant on larger strategic sites to meet much of its housing need which will inevitably have longer lead-in times before development commences on the ground.
- 6.14. Significantly, the SA identifies that medium size sites provide 'good confidence' regarding the potential to deliver the full policy quota of affordable housing, and certainly with regard to land South of New Road Hixon, there is a commitment that a full policy compliant level of affordable housing be provided.

Hixon v Woodseaves

- 6.15. There is a lack of clarity with regard to the Stage 4 element of the site selection process, and specifically why certain sites or settlements were chosen over others, as set out in the Site Selection Topic Paper (Preferred Options Stage).
- 6.16. In addition to the need for additional housing to be provided within the rural areas, there is also a question over the identification of both Gnosall and Woodseaves as preferred



locations for development. Neither scored as high as Hixon (or indeed for other settlements) in the Council's own assessment of settlement sustainability, and indeed in the earlier drafts of the settlement hierarchy Woodseaves had been identified as a medium village in a tier wholly separate and below that of the large villages which included Hixon.

- 6.17. The suggestion that Hixon or other Larger Villages were excluded from development growth because historically they had seen growth in the last decade, is not a justified response to the evidence base.
- 6.18. Firstly, this is a plan looking forward to 2040 and it is the needs of the population over the next two decades which needs to be addressed in a forward-looking plan not providing a strategic planning framework based on a narrow view of historic growth. Moreover, the fact that Hixon has been able to accommodate development historically is a reflection of the market signals which demonstrate delivery and the attractiveness of Hixon as a sustainable settlement capable of accommodating growth.
- 6.19. More significantly, there seems little purpose in providing detailed assessment and an evidential basis to quantify the level of services, facilities, public transport accessibility, landscape impacts etc within a settlement if the actual strategy is simply going to be one reflected upon not developing where development has been successful before. It is surely the purpose of all this substantial background research that it provides an evidential basis to identify the most sustainable settlements for future growth. The preferred options plan, however, appears not to follow the evidence when providing for such limited allocations in the rural areas and for those to be limited to two of the less sustainable settlements.
- 6.20. The SA at 9.2.2 for example, identifies that whilst Stafford/Stone have good transport connectivity, but then acknowledges that connectivity may be good in the rural areas. This is born out on the Settlement Assessment Topic Paper. The SA notes that in terms of Air and wider environmental quality, for example, there is a need to support local centres and services/facilities, and yet this is not carried through into any affirmative Plan action.
- 6.21. The SA specifically identified that part of the reasons for maintaining Stafford and Stone as the main towns where development should be concentrated was, *inter alia*, their proximity to main centres of employment. Hixon is perhaps uniquely placed as one of the large settlements within tier four of the settlement hierarchy in having two Recognised Industrial Estates (RIE), within the village. No such facilities exist at either Gnosall or Woodseaves. The RIE are protected through policy for retention as employment sites and it is expected, therefore, that they will continue to support the settlement of Hixon with varied employment opportunities on its doorstep.
- 6.22. Concern is raised over the absence of clarity within the Site Selection Topic Paper as to how the stage 4 assessment was undertaken. It is simply stated that all sites which had reached stage 4 'were evaluated on the provided evidence' (this included the subject site at Hixon). However, there is no clarity as to how this evaluation took place or how the decisions were made to either propose an allocation or to define the site as a 'potential site option' or to 'reject' the site.
- 6.23. With regard to the owner's site at Hixon, the evidence submitted to the Council indicated that this site was available and suitable for delivery and that it is well related to the highly sustainable settlement. The SHEELA assessment for HIX20 states that it is 'unknown' if the site is available for development, and yet the assessment follows from a specific promotion by the landowner promoting its availability.



- 6.24. Moreover, the assessment states that it is unknown if the necessary infrastructure is considered to be available within the locality to support the development. Yet the Council's same assessment for the area under HIX 12, which incorporates the HIX20 land but with additional land included, identifies that infrastructure is available. There is a clear inconsistency in the Council's SHEELA approach and the assessments cannot both be correct. Having regard to the assessments of other sites at Hixon, it would very much appear that there is a recognition that the supporting infrastructure is indeed available at Hixon and the SHEELA assessment for HIX20 should be revisited, updated and factually corrected.
- 6.25. That updated assessment should be then used to assess the site within the context of the need for additional rural allocations and with the benefit of the Vision Document which is before the Council.
- 6.26. In summary, therefore, with regard to the spatial strategy as interpreted through Policy 12, this is considered unsound because it is neither justified nor effective, in the terms established by NPPF ¶35. Specifically;
- it does not provide for an appropriate mix and range of housing across the Borough, contrary to the expectations of the SA and NPPF ¶62
 - it fails to maximise the opportunities for delivery of rural affordable housing; NPPF ¶68
 - it fails to maximise the potential for early delivery sites where there is reliance upon large strategic sites elsewhere within the Plan, with their associated risk of late delivery
 - it fails to recognise and maximise the benefit of existing brownfield land at Hixon
 - it fails to support those settlements within the Tier 4 settlement hierarchy which are best placed in terms of sustainability, as identified through the Council's own evidence base
 - it fails to meet the Plan's own Vision and Objectives
 - it follows from an opaque site selection process.



7. Vision for Land South of New Road, Hixon

- 7.1. A Vision Document for the development of land South of New Road, Hixon is attached at **Appendix 2**. The Vision was submitted to Stafford Borough Council as part of its ongoing call-for-sites exercise in April 2022. A copy was provided contemporaneously to Hixon Parish Council.
- 7.2. The full details for the Vision are established with the submitted Vision Document at Appendix 2, the resultant concept masterplan for the site, is illustrated below.



- 7.3. The Vision flows from a detailed assessment and understanding of the Site's landscape, ecological, accessibility and heritage constraints and establishes a coherent masterplan demonstrating how development of some 130 new homes could be delivered as part of a sustainable and high-quality development. The site lies immediately adjacent to the existing village boundary on land which is both physically and visually self-contained, including significant elements of brownfield land, and which has the potential to significantly improve footpath and cycle way connectivity to the existing local community.
- 7.4. Hixon is a highly sustainable settlement and is recognised as such within the Council's Revised Settlement Assessment and Profiles Topic Paper (Preferred Options Stage), where the village is identified as one of only twelve Large Settlements at Tier 4 of the settlement hierarchy, and scoring joint highest under the Council's revised assessment methodology for availability to services and facilities, alongside four other large settlements (i.e. Barlaston, Blythe Bridge, Eccleshall and Great Haywood).
- 7.5. The services and facilities score of '11' identified for the settlement of Hixon is the maximum assessment score which was achievable under the Council's assessment methodology



demonstrating full availability of all the key services and facilities which formed part of that assessment. Those key services and facilities include provision of a primary school, GP services, convenience store, food or drink establishment, post office, library, village hall, place of worship, hourly bus service, employment access ability and recreation ground.

- 7.6. All of these facilities would be within a 5-minute walk time of the Site when developed. By any assessment, Hixon is a highly sustainable rural settlement, and the Site well related to it.
- 7.7. The Vision Document prepared for the site draws upon a detailed landscape and visual appraisal of the site and concludes the site is physically and visually well contained with little or no perception of it currently from the wider landscape, particularly from more sensitive receptors. The site is relatively poor in terms of its current landscape condition and quality and does not contribute strongly to the wider and could cultural mosaic which is characteristic of the wider landscape. The site reflects poorly in terms of character and appearance being predominantly existing scrub and rough grassland sat within areas of hard standing which are remnants of the sites previous association with the now redundant Hixon airfield use.
- 7.8. Whilst the Council's Landscape Sensitivity Study (October 2021) identifies that this site has 'medium' landscape sensitivity, this assessment was undertaken in the context of a slightly wider identified assessment area at that time under site HIX 12. In any event, it does not reflect the detailed findings of the assessment undertaken in respect of the preparation of the Vision Document supporting these representations. The site as now promoted under the local authority reference HIX 20, was not before the Council at the time it undertook its landscape sensitivity study in October 2021 (that reviewed a much larger site under ref HIX 12). However, the evidence submitted with the call for sites for HIX 20 demonstrates that the site's landscape sensitivity is in fact 'low' and notably less sensitive than other sites promoted in and around the settlement.
- 7.9. With regard to the site's ecological sensitivity, it is not the subject of any such statutory ecological designations. Whilst the site will hold some ecological interests through boundary features, hedgerows and trees which will need to be properly assessed and mitigated through any development proposals, it is predominantly scrubland and hard standing in nature, and these do not give rise to any matters of significant or constraining ecological interest within the Site's boundaries.
- 7.10. With regard to accessibility the Site is uniquely placed to offer the potential for new pedestrian/cycle links from the existing residential developments of Queen's Drive/Elizabeth Gardens to St Peters C of E Primary School. At present this requires use of an incommensurate routing along New Road, Martins Way and Church Lane, which are well trafficked routes and not conducive to encouraging pedestrian access. Vehicular access can be achieved either through the existing residential development off Queens Drive/Victoria Walk, which has incorporated the necessary provision for extension of vehicular access into the site, or alternatively via New Road.



8. Conclusions

- 8.1. R&J Sutton and Langtry Developments Ltd, welcome the opportunity to engage in the Regulation 18 Local Plan consultation, and support the Borough Council's decision to undertake a full update of the Local Plan.
- 8.2. The Council's overarching spatial strategy, and the ability to the deliver the Vision and Objectives for the Local Plan, without making far greater provision for housing across the Borough's rural areas, is challenged.
- 8.3. Specifically, the strategy is considered to fail to deliver an appropriate quantum of housing outside of the two main settlements (Stafford/Stone); and the locations for development which the plan has identified do not appear to flow logically from an examination of the Council's own evidence base, nor are they evidence led allocations. This important element of the Council's local plan strategy is considered unsound on the grounds of 'effectiveness' and 'justification'.
- 8.4. Land South of New Road, Hixon is promoted as part of a response to the failings of the Preferred Options strategy. In addition to factual errors identified in the SHEELA assessment, the merits of the site are promoted, as part of a holistic strategy to deliver a spatial strategy more closely aligned to the findings of the interim sustainability assessment, and available evidence.
- 8.5. Hixon is identified at Tier 4 of the Council's settlement hierarchy and is rated equal first as the most sustainable of all the rural settlements within the Borough. The failure to identify any new housing allocations for growth up to 2040, is considered an unsustainable response to the needs of the local communities, and contrary to the provisions of the NPPF.
- 8.6. The Council are invited to re-visit the strategy ahead of a Regulation 19 consultation and look to significantly bolster the provision of sustainable housing delivery for the 40% of the population, that do not live within the Borough's two main settlements.



Appendix 1: Site Location Plan



KEY
 SITE LOCATION (TRAC)
 19.31 AC (7.83 HA)



LAND SOUTH OF NEW ROAD, HIXON
SITE LOCATION

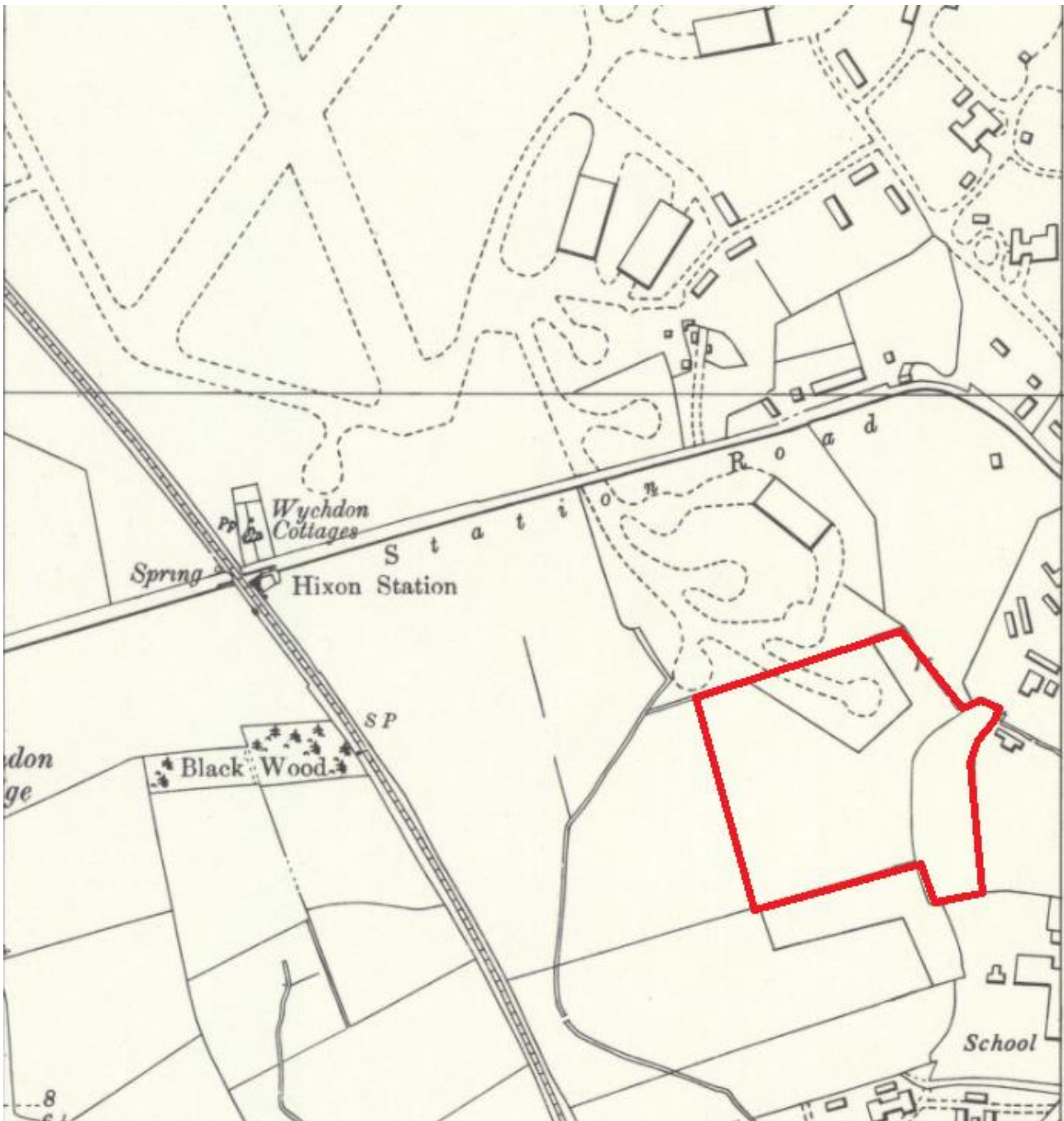
PLANNING | DESIGN | ENVIRONMENT | ECONOMICS | www.pegasusgroup.co.uk | TEAM/DRAWN BY: JT | APPROVED BY: JW | DATE: 31/01/22 | SCALE: 1:1000 @ A1 | DRWG: P21-2822_S3 REV: - | CLIENT: LANTRTY LODGE |



Appendix 2: Vision Document

See separate accompanying document.

Appendix 3: OS Historic Mapping



OS Mapping 1966, indicating airfield (ie brownfield) extent within the site

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

Expertly Done.

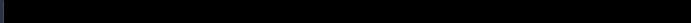
DESIGN | ECONOMICS | ENVIRONMENT | HERITAGE | LAND & PROPERTY | PLANNING | TRANSPORT & INFRASTRUCTURE



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LAND SOUTH OF NEW ROAD, HIXON

VISION DOCUMENT



Prepared by Pegasus Group Ltd
Prepared on behalf of Langtry Lodge
April 2022 Project code P21-2822
Project Director: Adrian Moore

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LAND SOUTH
OF NEW ROAD
HIXON

INTRODUCTION

1



DOCUMENT OVERVIEW

- 1.1 This vision document has been prepared to support proposals for the allocation of land to the south of New Road, Hixon (the "Site") for high-quality residential development in the emerging Stafford Borough Local Plan 2020–2040.
- 1.2 The vision encompasses the emerging proposals for the Site, which could deliver a sustainable and balanced residential development of up to 130 new homes, supported by enhanced green infrastructure, generous public amenity space and improved local connectivity including a new formal pedestrian/cycle link to St Peter's C of E Primary School. The vision is based on a careful assessment of the Site's context, including the surrounding landscape, local heritage assets and the existing transport and movement network.
- 1.3 As set out in the remainder of this vision document, there is an opportunity to achieve a well-designed and comprehensive development of the Site, which respects local character, retains and enhances important features and views and meets a range of local needs to the benefit of the wider community.

SCOPE AND STRUCTURE

- 1.4 This vision document is structured as follows:

Section 1: Introduction

Section 2: The Development Site

Focuses on the Site's context, setting out the constraints and opportunities.

Section 3: Planning Context

Focuses on the planning context surrounding the promotion of the site and how the development of the Site can contribute to the Council's overall strategic objectives for land and development.

Section 4: Technical Matters

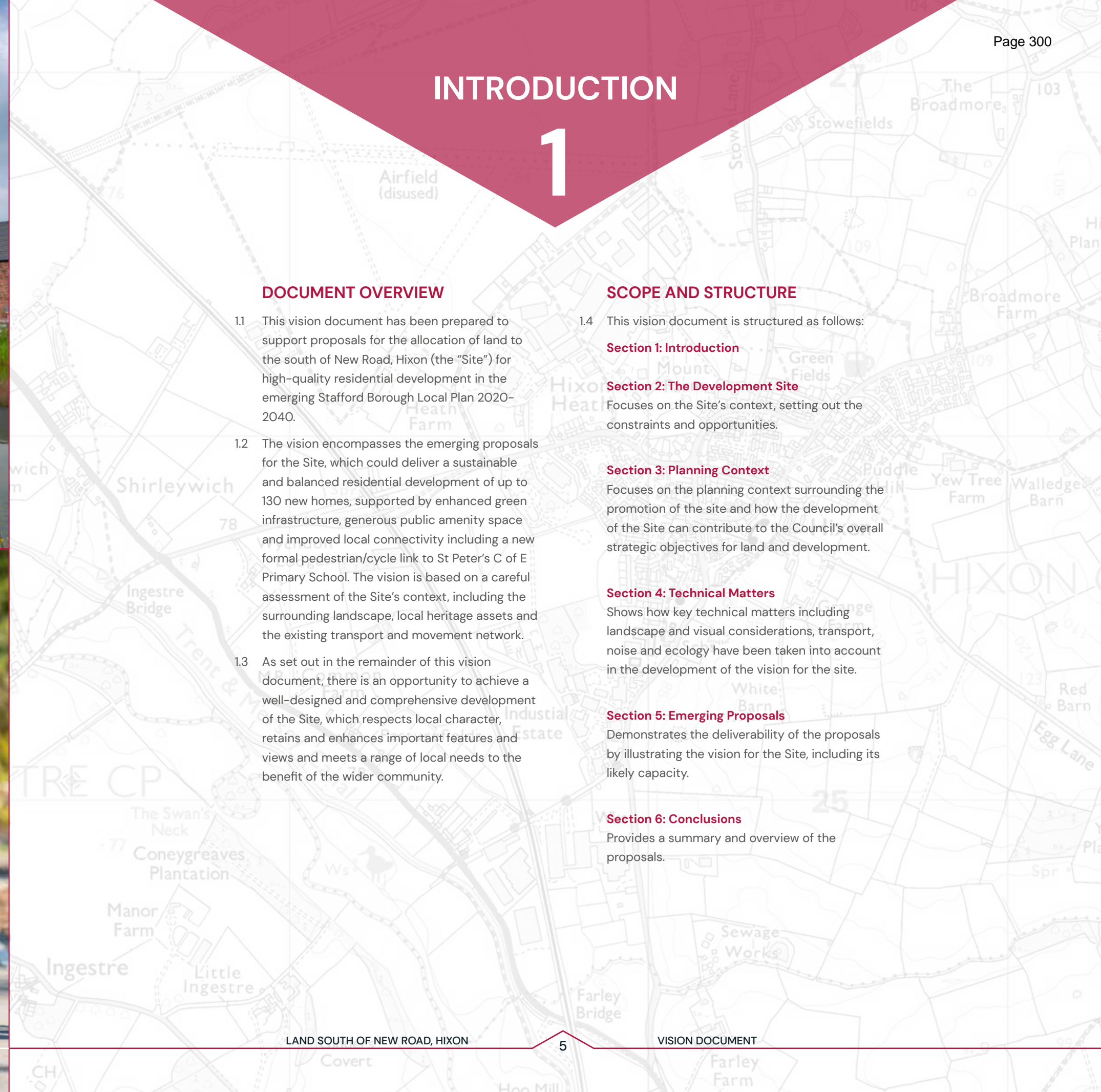
Shows how key technical matters including landscape and visual considerations, transport, noise and ecology have been taken into account in the development of the vision for the site.

Section 5: Emerging Proposals

Demonstrates the deliverability of the proposals by illustrating the vision for the Site, including its likely capacity.

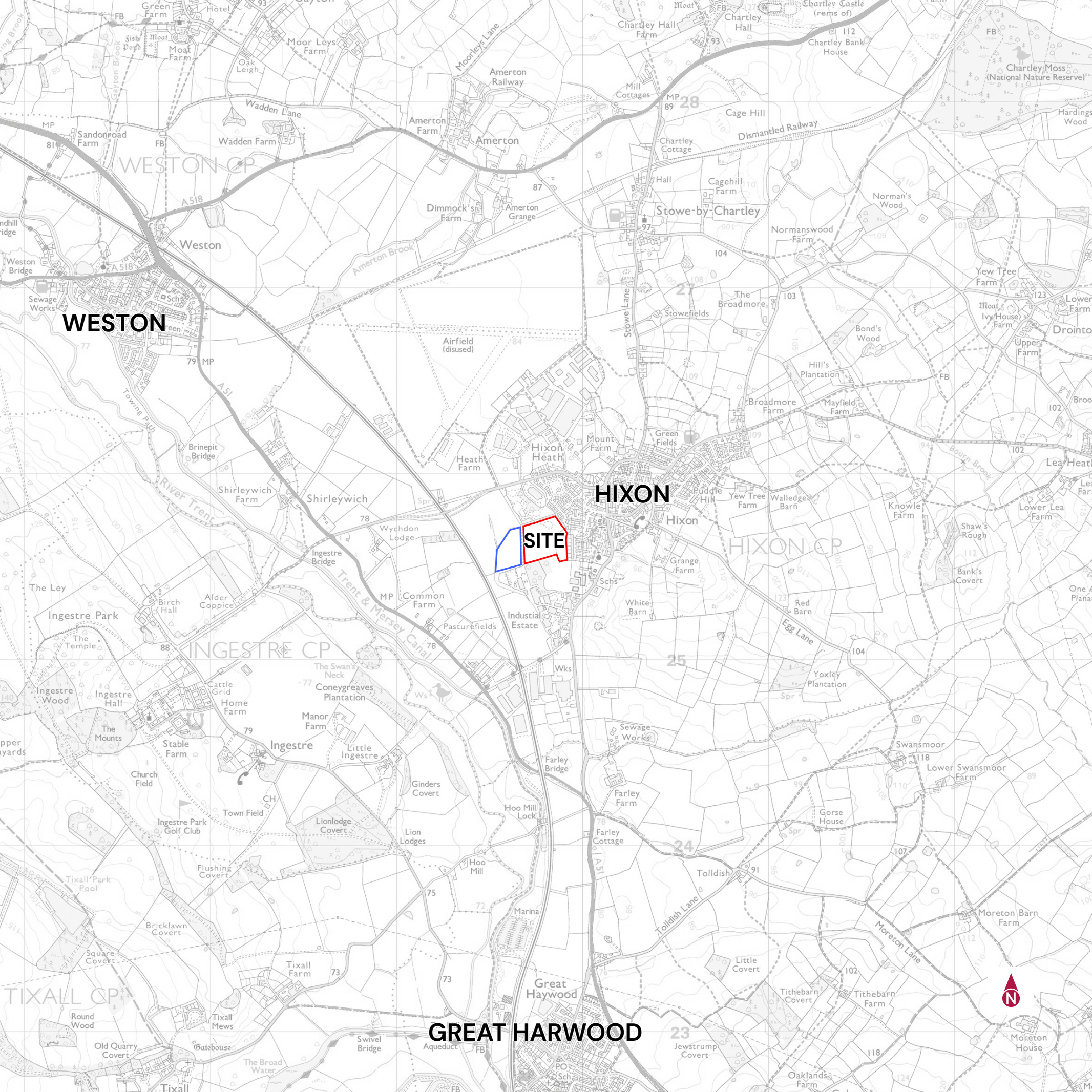
Section 6: Conclusions

Provides a summary and overview of the proposals.



THE DEVELOPMENT SITE

2

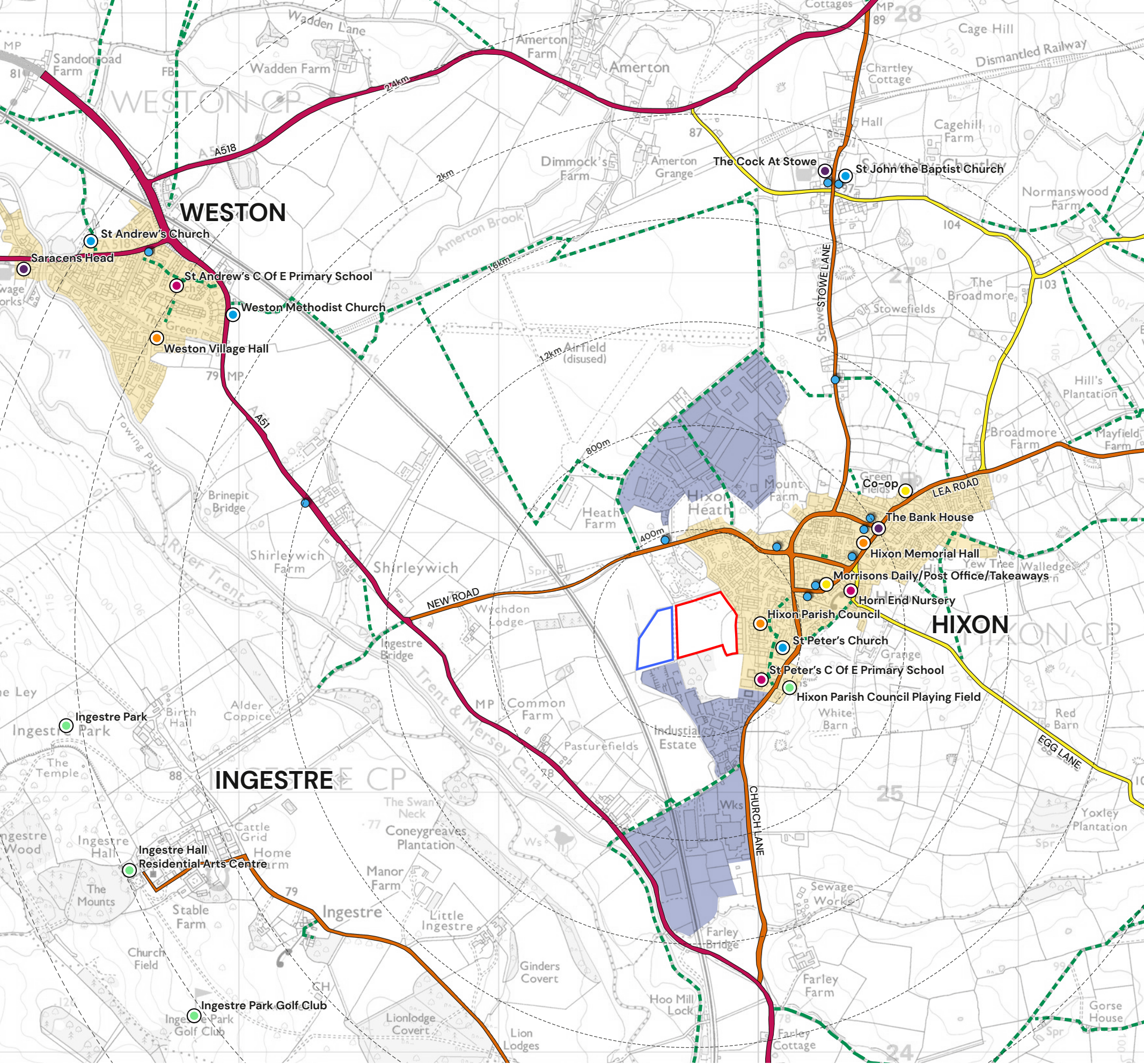


THE SITE

- 2.1 The site is former airfield land located at New Road on the western edge of Hixon, indeed there are remnants of runway and apron hardstanding still existing within the site and which represent previously developed airfield land. The landform of the site is relatively uniform, sitting between approximately +75m and +80m above ordnance datum (AOD). The site boundaries comprise a mix of hedgerows with sections of linear tree belts; occasional mature trees are also present. These serve to contain the medium to large scale field pattern at a site level, however the wider enclosure is bisected by the route of an access track which connects New Road to an industrial estate to the south.
- 2.2 The context of the site is defined by its relationship to the existing settlement pattern, variations in the settlement area, and the transition to the wider landscape. The parcel of the site to the east of the access road is located

directly adjacent to the existing settlement edge, at this point characterised by a relatively uniform line of residential dwellings. Adjacent to the north of the eastern parcel is a commercial/industrial building set within a larger landscaped plot; to the south is an irregular field enclosure, school and playing fields. The parcel of the site to the west of the access road is more remote from the core of Hixon, but is still strongly associated with the existing settlement area which, at this point, is characterised by a large scale industrial estate.

2.3 Elsewhere around the settlement there are further extensive industrial/commercial areas (across the airfield) with the main settlement extending across the rising slopes and landform to the east. To the west of the site (and settlement) the broad valley of the River Trent is characterised by mixed agricultural land, within which the railway, Trent and Mersey Canal, A51 and the River Trent are all features.



- Site boundary
 - Potential future employment
 - Built-up area (predominantly residential)
 - Industrial/commercial
 - Public footpath
 - Bridleway
- Road network**
- A road
 - B road
 - Local road
 - Bus stop
- Facilities**
- Leisure & recreation
 - Retail
 - Community
 - Place of worship
 - Education
 - Pubs and restaurants
- N Local facilities - Not to scale

FACILITIES

2.4 The nearest shops and local amenities are located within the village centre of Hixon, approximately 400m to the east. The local centre in the village has a range of facilities and services which include a Post Office, convenience store, Co-Op food retail, pub, recreational fields, sporting and children's facilities.

2.5 St Peter's C of E Primary School is located to the south-east of the Site along Church Lane, approximately 400m from the Site. St Andrews C of E Primary School is located 2km to the north-west of the site.

STRATEGIC LOCATION

2.6 The Site is well located in relation to the local transport network. The nearest train stations are Stafford and Rugeley Trent Valley (8km south and west of the Site).

PLANNING CONTEXT

3

HIXON



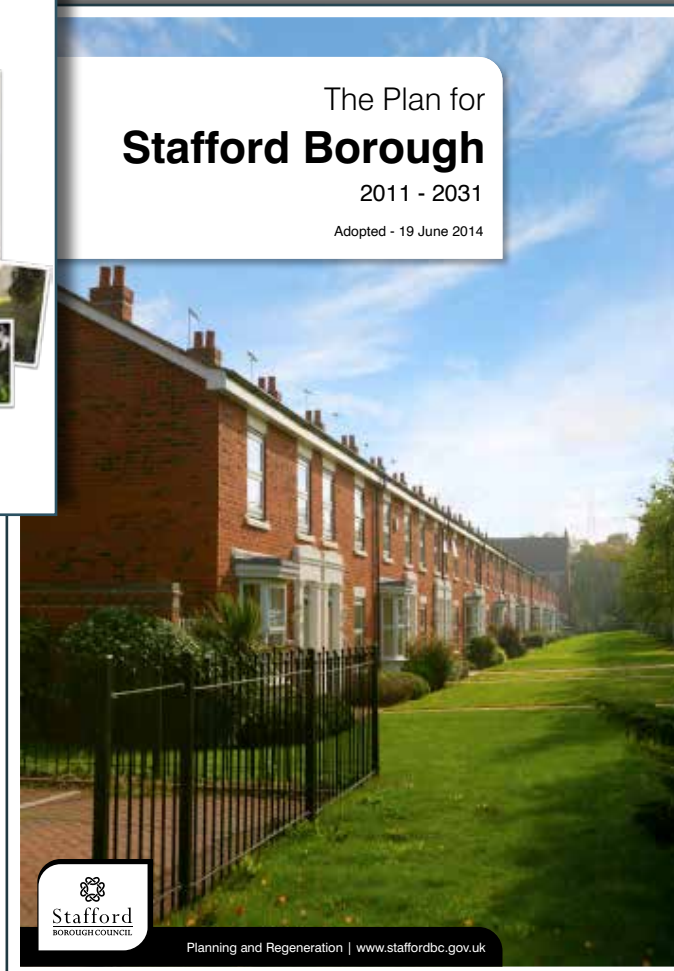
2011—2031



The Plan for Stafford Borough

2011 - 2031

Adopted - 19 June 2014



Planning and Regeneration | www.staffordbc.gov.uk

THE DEVELOPMENT PLAN AND EMERGING POLICY

- 3.1 The Government's National Planning Policy Framework ("NPPF") recognises that the planning system should be genuinely plan-led, with succinct and up-to-date local plans providing a positive vision for each Borough and District, a framework for addressing housing needs and other economic, social and environmental priorities. 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.
- 3.2 The Site is located within the administrative boundary of Stafford Borough Council. The statutory development plan for development in Hixon comprises the adopted Plan for Stafford Borough 2011-2031 ("PSB") the Plan for Stafford Borough Council Part 2 ("PSB2") and the Hixon Neighbourhood Plan.
- 3.3 The Council is in the process of preparing the new Stafford Borough Local Plan 2020-2040, which will fully replace the PSB and the PSB2 with a new development strategy, site allocations and development management policies. The current target date for adoption of the Local Plan 2020-2040 is October 2024.

SPATIAL STRATEGY

- 3.4 The adopted PSB sets out the Council's current strategy to provide for the development of 500 dwellings per year over the plan period. It proposes the delivery of the majority of future development through the Sustainable Settlement Hierarchy: first to Stafford (70%), then Stone (10%), then the 11 Key Service Villages, including Hixon (12%). The Vision expressed in the PSB includes the provision of high-quality designed developments with a range of housing types and tenures and improved accessibility to services and facilities by providing safe, attractive and convenient sustainable connections.
- 3.5 The Site is immediately adjacent to the settlement boundary of Hixon identified in the PSB2 and the Hixon Neighbourhood Plan. The Neighbourhood Plan supports proposals for new housing development within the settlement boundary. The PSB confirms that new development will need to be provided, generally, outside of the existing built-up areas of settlements because insufficient infill sites exist to deliver the scale of new development required in most of the settlements.
- 3.6 According to the Council's projected future housing needs scenarios, the new Stafford Borough Local Plan 2020-2040 is expected to need to plan for the delivery of between 489 and 746 dwellings per annum. Consultation on an Issues and Options document took place in 2020. The Issues and Options document proposes to carry forward three growth options: dispersal of development across the new settlement hierarchy (with 10-20% in Large Settlements including Hixon); dispersal of development across the settlement hierarchy and a new Garden Community; and concentrating development within existing transport corridors / clusters of communities. For all of these scenarios, the Council will need to consider the availability of potential residential sites in and around Hixon.
- 3.7 There is an opportunity to deliver new high-quality development at the Site which assists with addressing the Borough's housing needs, relates well to existing development, improves links to existing facilities and services (including improved pedestrian/cycle connectivity to St. Peter's C of E Primary School) and meets the aspirations and requirements of the detailed policies in the PSB2 and the Neighbourhood Plan.

TECHNICAL MATTERS

4

LANDSCAPE AND VISUAL

Landscape Character

- 4.1 At a National Level, landscape character is defined by the series of National Character Areas (NCA) which define character at a broad regional scale. The site (and Hixon and its landscape context as a whole) is located in NCA 68, Needwood and South Derbyshire Claylands. Although key characteristics are likely to be broad scale, they provide a useful context and background to the settlement and site. Key characteristics from the NCA, relevant to Hixon and its landscape context, include:
- A predominantly pastoral landscape of rolling countryside that is still largely rural and relatively tranquil, featuring distinctive field boundary patterns and characteristic hedgerows with hedgerow trees. Grassland for livestock is the dominant land use although dairy and cereal farming are also important.
 - An overall wooded character derived from scattered ancient and seminatural woods, parkland and boundary trees. There is new woodland creation within The National Forest.
 - Predominantly hedgerow bounded, the field pattern varies from small to medium-sized fields to the north of the Dove; mostly large-scale and rectilinear on the broad river flood plains; strongly rectilinear in Needwood Forest; and smaller and more irregular to the west.
 - A wide range of habitats associated predominantly with pasture, varying from damp lowland grassland and marshland to drier neutral grassland. Areas of open water such as Blithfield Reservoir and the major rivers are important for birds.
- 4.2 At a more local level, landscape character is defined by a County level study 'Planning for Landscape Change' (Staffordshire County Council, 2000). The site is located in the 'Settled Farmlands' landscape type (LT) as defined by the study (Farmlands sub-type).
- 4.3 The LT surrounds Hixon generally, but extends considerably to the north-west and south-east aligned with the valley sides of the River Trent. To the west of Hixon, the LT extends beyond the route of the A51, with its boundary aligned with the adjacent character types which are defined by the river corridor.
- 4.4 The guidance describes the Settled Farmlands LT as:
- “Closely related to the settled plateau farmlands, but lacking their boulder clay, these are landscapes of undulating lowlands and hills, with non-calcareous brown soils overlying Triassic mudstones. The dominant land use is dairying with some mixed farming. There is a varied pattern of small to medium sized hedged fields with a scatter of small woodlands, often of ancient origin. The settlement pattern is mixed, and not distinctive. There is a parkland variant of the general farmland type.”*
- 4.5 It goes on to discuss key aspects of its landscape quality (and limitations on this) which includes the loss of characteristic seminatural vegetation, in particular ancient woodland and hedgerows, and semi-natural grasslands. The guidance specifically notes that:
- “The landscape to the west of Hixon will accept considerable amounts of large-scale woodland, with a conifer element being appropriate. Woodlands should be kept back from roads to ensure some views through the landscape to surrounding areas and care will need to be taken over the design of woodland edges”*



Local Landscape and Village Context

- 4.6 At a more local level, the site in its context reflects the transition between the settlement edge to the more rural landscape to the west, and the influence of the extensive commercial and industrial development areas that are located to the north-west, west and south-west of the settlement.
- 4.7 The site is relatively well enclosed to the north and south by existing industrial areas and boundary vegetation, however the residential edge to the east is also influential on character at a local level. The land use of the site,

comprising underlying runway and apron hardstanding associated with the land's former airfield use and wide areas of scrub vegetation, contrasts with the wider pattern of arable fields to the north-west and west, and also more generally the mixed agricultural field patterns which surround Hixon as a whole.

- 4.8 Other than the boundary vegetation, there are few features on the site of note. The existing access road the development bisects the wider site and there are some limited views across the site toward the Church of St Peter.

Views and Visual Amenity

- 4.9 Overall the site is relatively well contained and there are few clear views into the core of the site. This is due to the combination of the relatively uniform and low-lying landform and associated containment by topography and built form in the surrounding context.
- 4.10 Where views to or into the site are available, these tend to be strongly influenced by the existing components of the settlement, including



View from site looking east to Church of St. Peter spire

residential areas which sit across the rising landform to the east, and industrial/commercial areas to the north and south. To the west, topography continues to be relatively low lying and this, combined with a layering effect created by green infrastructure across the landscape tends to screen potential views.

4.11 In summary, the visual envelope for the site is considered to be limited, and defined broadly as follows:

- To the east, largely private views associated with existing residential areas along the settlement edge;
- To the north and south, restricted by industrial and commercial areas, with some filtered views from New Road and some views from the specific elevated vantage point of the pedestrian railway crossing;
- To the west, largely limited or screened by intervening vegetation heavily filtered views.

LANDSCAPE AND VISUAL ANALYSIS

4.12 Having undertaken a high-level review of the baseline information (including both desk study and site survey), the analysis of physical landscape, landscape character and views/visual amenity of the area, has been developed as a series of constraints and opportunities which can be used to both inform potential development capacity and guide an appropriate strategy for mitigation.

4.13 Landscape and visual constraints are considered to be:

- boundary vegetation which provides physical containment to the site and contributes to the green infrastructure network;

- the site reflects poorly in terms of character and appearance being predominantly existing scrub and rough grassland partially underlain by hardstanding;
- the site represents a more open pocket of landscape on the settlement edge by contrast to the commercial and industrial areas to the north and south; and
- the site represents part of the interface between the settlement and wider landscape context, and an appropriate treatment is consequently required.

4.14 Landscape and visual opportunities are considered to be:

- the site is physically and visually well contained, with little or no perception of it currently from the wider landscape, particularly from more sensitive receptors (such as recreational/rights of way users);
- the site is relatively poor in terms of its current landscape condition and quality and does not contribute strongly to the wider agricultural mosaic which is characteristic of the wider landscape;

- other than the boundary vegetation, there are few notable landscape features on the site which may otherwise form a constraint to development;
- available views to the Church of St Peter from the site are neither publicly available, nor the best experience of the church in its setting, however there are views to it which might be referenced in a layout;

- published landscape character guidance for the landscape type recognises that larger scale woodland planting is appropriate and this might be usefully applied to the western parts of the site (and the interface with the wider landscape) to contribute to the reinforcement of the green infrastructure network as well as provide visual screening – this would complement and enhance local landscape character.



View from site looking to boundary of existing residential development

DEVELOPMENT AND LANDSCAPE STRATEGY

- Retain and enhance boundary vegetation through a program of planting and management, also to include a wider buffer to these corridors
- Views through the layout toward the Church of St Peter have been retained
- More substantial landscape buffer, incorporating a greater proportion of tree and woodland planting, is located along the western edge of the site to provide screening but also to complement local landscape character.
- Create new amenity space, including play areas, a network of footpaths, cycle paths and community orchard within the open space for new and existing residents.



View from New Road looking towards existing access road onto site



Stafford Train Station



Rugeley Trent Valley Train Station



View from New Road intersecting A51

TRANSPORT

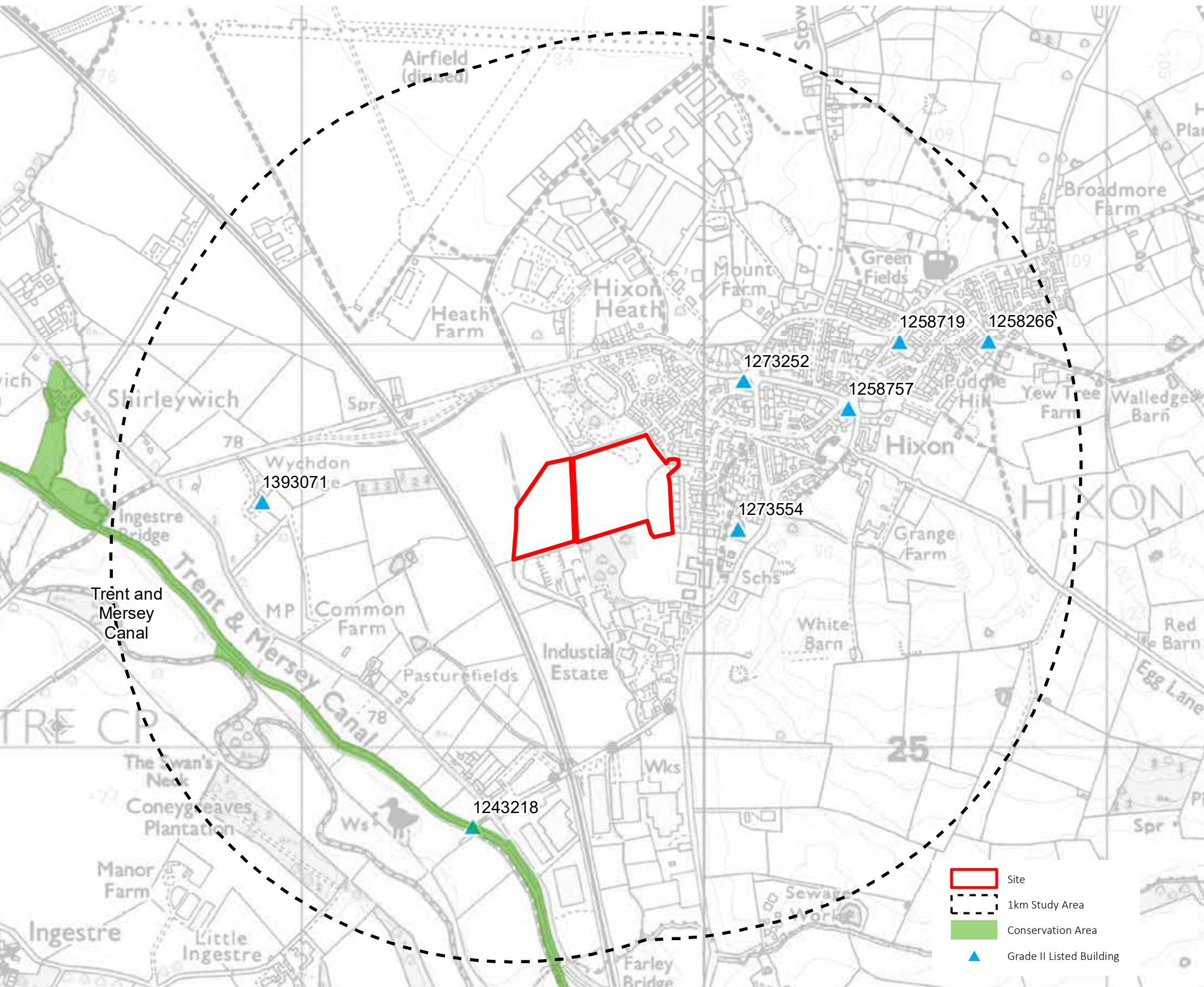
Site Access

- 4.15 The site can currently be accessed off a private road which leads from New Road into the JBMI Group aluminium works to the west of the site. The road varies in width between 7.5 metres and 4 metres at pinch points. At the junction with the private road, New Road is subject to a 40mph speed limit, there is no street lighting and footways are provided to the north of the carriageway only.
- 4.16 Immediately east of the site access the speed limit is reduced to 30mph with footways provided on both sides of the road and streetlighting provided within the urban area of Hixon.
- 4.17 Approximately 1km west of the site access, New Road connects with the A51, which provides a key local route to Stone and Stoke to the north and Rugeley and Lichfield to the south.

Accessibility

- 4.18 The site is well located within walking and cycling distance of local facilities and amenities within Hixon, including local bus stops and employment. Footways are generally provided on both sides of all carriageways within the built-up area of the village of Hixon. Pedestrian routes benefit from lighting and dropped kerb with tactile paving crossings. A network of footpaths is also provided via connecting adjacent residential cul-de-sacs including a footpath between Sycamore Drive and St Peter's C of E Primary School. Many of the surrounding roads are lightly trafficked, providing attractive conditions for cyclists.
- 4.19 Hixon provides a range of services conducive with a busy village including a primary school, nursery, convenience store, post office, church, take aways and pub. The majority of services are located within 400 metres of the site, this equates to around a five-minute walking time or a two minute cycling time based upon walking and cycling speeds of 80 metres per minute and 280 metres per minute. Hixon also provides a variety of employment opportunities commensurate with larger urban areas within 1km of the site, equivalent to a 13-minute walk or 5-minute cycle.

- 4.20 The closest bus stops are located on New Road approximately 300 metres north of the site. These bus stops are served by bus route 841 which provides connections to Stafford via Weston to the west and Uttoxeter to the east. Buses operate Monday to Saturday with an hourly daytime frequency. There are additional stops for this service on Smithy Lane.
- 4.21 The closest railway stations to the site are Rugeley Trent Valley and Stafford located 8km south and west of the site respectively. Rugeley Trent Valley railway station provides hourly services between Crewe and Rugby and two trains per hour to Birmingham New Street with alternate services continuing to Birmingham International. Stafford railway station provides regular direct services to Birmingham New Street, Rugby, Crewe, Liverpool, Southampton, London and Manchester. There is an aspiration that should large scale residential development occur at Hixon Airfield and Weston within the emerging plan, a new railway station would be considered on the live railway line located 300m west of the site access.



- Site
- 1km Study Area
- Conservation Area
- ▲ Grade II Listed Building

DESIGNATED HERITAGE ASSETS

HERITAGE

4.22 An Initial Heritage Appraisal has been undertaken of the site which is informed by a review of the National Heritage List for England (“NHLE”) data, Staffordshire Historic Environment Record (“HER”) data, National Mapping Programme (“NMP”) data, and observations from a site visit and walkover. A 1km study area has been used to inform the Appraisal.

Archaeology

4.23 No previous archaeological work has been carried out within the site, however a review of previous archaeological works of note within the vicinity of the site has been undertaken. A review of historic cartographic sources of the post-medieval and modern periods, including Tithe apportionments and Ordnance Survey mapping, confirm that the site was most likely part of the agricultural hinterland of Hixon and undeveloped until the construction of RAF Hixon in the 1940s. The Site is situated within the former bounds of the World War Two airbase, RAF Hixon. The site walkover confirmed the presence of surface remains associated with the airbase, which are suggestive of aircraft dispersal pads and perimeter tracks. These are of limited historic interest, though they may warrant a recording exercise prior to their removal. Based on the currently available information provided by HER and NMP data, the potential for archaeological remains from earlier periods is considered low, and would not represent a constraint to redevelopment of the site.

Built Heritage

4.24 No designated heritage assets are recorded within the site, however there are a number of Listed Buildings and a Conservation Area within 1 km of the site. Of these, only four assets were identified for detailed appraisal on the basis of their proximity to the site and intervisibility comprising:

- Trent and Mersey Canal Conservation Area;
- Grade II Listed Church of St Peter (NHLE No. 1273554);
- Grade II Listed New Road Farmhouse (NHLE No. 1273252); and
- Grade II Listed Wychdon lodge and Outbuildings, c.635m west of the site (NHLE No. 1393071).

4.25 However, initial detailed assessment has determined that the site does not contribute to the significance of any of these designated heritage assets through setting and would not represent a constraint to redevelopment of the site.

Summary

4.26 Based on currently available information, neither archaeology nor built heritage is anticipated to pose constraints to the potential residential development of the site. The design of new development should reflect the local surrounds in terms of architectural detailing, materiality and layout which is predominantly characterised by modern development to the east.



- KEY**
- SITE BOUNDARY (TBC)
12.75 AC / 5.16 HA
 - POTENTIAL FUTURE EMPLOYMENT (TBC)
6.35 AC / 2.57 HA
 - INDICATIVE EXISTING VEGETATION
 - SOFT EDGE / FILTERED VIEWS TO COUNTRYSIDE EDGE
 - VIEWS FROM DWELLINGS ON SYCAMORE DRIVE WITH OPEN REAR ASPECT
 - VIEW TO CHURCH OF ST. PETER GRADE II LISTED BUILDING
 - CHURCH OF ST. PETER GRADE II LISTED BUILDING
SOURCE MAGIC DOCKUS
 - PUBLIC RIGHT OF WAY
SOURCE BRND MAPS
 - POTENTIAL LOCATION OF SUDS
 - WATERCOURSE
 - EXISTING SITE ACCESS
 - SITE HIGH POINT
 - SITE LOW POINT
 - EXTENT OF FLOODING FROM SURFACE WATER MEDIUM RISK
SOURCE ODV UK
 - EXTENT OF FLOODING FROM SURFACE WATER HIGH RISK
SOURCE ODV UK

SITE CONSTRAINTS & OPPORTUNITIES

CONSTRAINTS AND OPPORTUNITIES

Constraints

- Relatively flat topography falling from the east end of the site to low points towards the southern end of the site;
- Low to medium risk pluvial flooding around existing drainage ditch course to south-west boundary;
- Existing wooded area to the south with potential for ecology;
- Existing development on Sycamore Drive with open rear aspects;
- Limited access onto site;
- Series of existing ditches running parallel to site boundary; and
- Key views identified by Landscape and Visual Impact Assessments.

Opportunities

- Create a sustainable and balanced residential development supported by enhanced green amenity space and new infrastructure;
- Provide a residential development that offers a series of different housing types, sizes and tenures which respect the local character;
- Create a road hierarchy that is not dominated by vehicular movement and promotes healthy green forms of movement;
- Create a new direct pedestrian/cycle path to St Peter's C of E Primary School avoiding use of main roads to the benefit of all residents;
- Retain key views to Church of St. Peter Grade II listed building;
- Retain and enhance all green infrastructure where possible;
- Create outward facing residential frontages which overlook newly created public open spaces. Helping to promote self-surveillance and reduce the risk of anti-social behaviour;
- Provide soft landscape edges along the northern, southern and western sides of development to provide a buffer to the surrounding landscape;
- Provide sustainable forms of drainage (SuDS) within both the development and green spaces, providing additional wildlife benefits;
- Enhance existing and create new habitats to promote biodiversity; and
- Create new amenity space, including play area, for new and existing residents.

EMERGING PROPOSALS

5

ACCESS AND MOVEMENT

5.1 Primary access into the site is proposed from Victoria Walk to the east, continuing the existing carriageway. A secondary access, for emergency vehicles, would be taken via highways improvements along New Road. Within the Site, a hierarchy of streets is proposed, ranging from:

- Primary tree lined avenues providing movement to all areas of the site with a 5.5m width, 2 x 2m tree lined verges and 2 x 2m footpaths.
- Secondary streets serve smaller clusters of development at a 5.5-4.8m width generally with 1 x 2m tree lined verge (on the high side following landscape recommendations) with 2 x 2m footpaths.
- Private drives vary between looped private lanes (capable of providing movement for refuse and fire tenders) to private lanes serving minimal dwellings to non-adoptable standards

5.2 The site benefits from a fully circulatory dedicated pedestrian/cycle movement route. The main pedestrian access point on to the site is highways improvements along New Road and a potential point from Victoria Walk (this will need to be confirmed by a highways engineer).

5.3 Spire View Greenway brings attention to the Church of St. Peter Grade II listed building local landmark.

DEVELOPMENT

5.4 The total quantum for the site is up to 130 dwellings. It is anticipated a range of densities can be achieved across the site with the lower ranging density to be along the green edges and greenway, with higher density development abutting up to existing development to the east, and north-eastern boundaries western boundary.

5.5 Development respects the sites rural nature with minimal removal of vegetation (mainly to accommodate access) and retention and enhancement of vegetation around and across the Site.

5.6 Integrates well with the local development grain.

GREEN INFRASTRUCTURE






5.7 Opportunities for wetland habitats are provided through the creation of sustainable urban drainage.

5.8 Community Orchard planting will feature to the south-west providing residents with educational/sensory enhancement opportunities.

5.9 Paths used for circulatory pedestrian/cycle movement around site. Opportunities for wildflower planting.

5.10 The existing landscape buffer to the southern boundary has sought to be protected and enhanced where possible.



-  SITE BOUNDARY (TBC)
5.16 HA / 12.75 ACRES
-  POTENTIAL FUTURE EMPLOYMENT
(TBC)
-  PROPOSED RESIDENTIAL DEVELOPMENT
NDA CIRCA 3.4HA / 8.4ACRES
UP TO 130 DWELLINGS (AT 38 DPH)
-  POTENTIAL SITE ACCESS
VIA VICTORIA WALK
-  POTENTIAL EMERGENCY ACCESS VIA
NEW ROAD
-  POTENTIAL PEDESTRIAN / CYCLE ACCESS VIA
IVY COURT / SYCAMORE DRIVE PUBLIC OPEN SPACE
-  PRIMARY MOVEMENT ROUTE
-  SECONDARY MOVEMENT ROUTE
-  EMERGENCY ACCESS ROUTE
-  PRIVATE DRIVE
-  PRIMARY PEDESTRIAN / CYCLE MOVEMENT
-  EXISTING UNSURVEYED VEGETATION
-  ENHANCED PLANTING BUFFER
-  PROPOSED 'FOCAL' PLANTING AT KEY
LOCATIONS THROUGHOUT SITE
-  COMMUNITY ORCHARD PLANTING
-  KEY FOCAL SPACES
-  VIEWS TO CHURCH OF ST. PETER
GRADE II LISTED BUILDING
-  POTENTIAL LOCALLY EQUIPPED AREA OF PLAY
-  CHURCH OF ST. PETER
GRADE II LISTED BUILDING
-  SUSTAINABLE URBAN DRAINAGE (TBC)
-  PUBLIC RIGHT OF WAY
SOURCE BING MAPS

 DEVELOPMENT FRAMEWORK PLAN



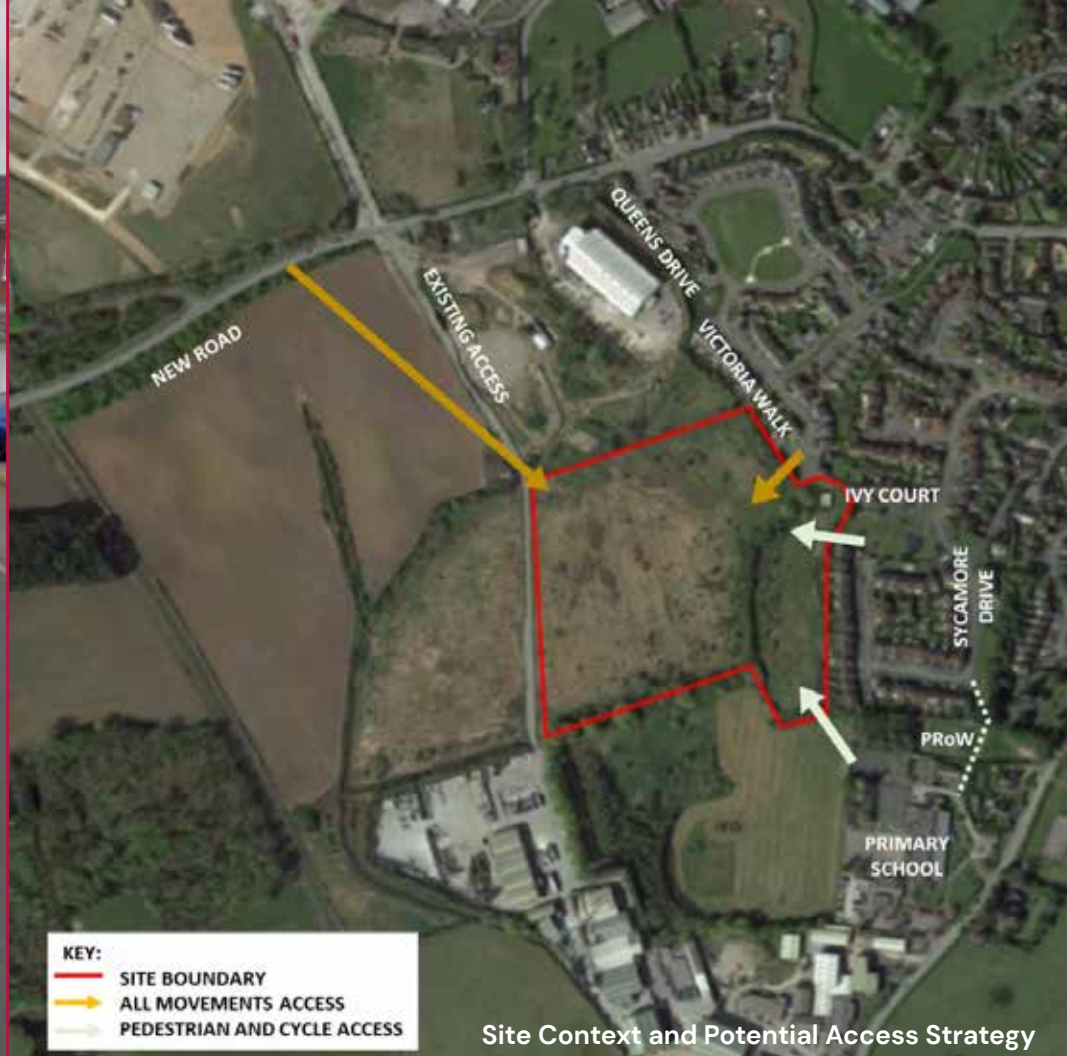
KEY PRINCIPLES:

1. PRIMARY SITE ACCESS VIA HIGHWAYS IMPROVEMENTS ALONG VICTORIA WALK;
2. PRIMARY VEHICULAR MOVEMENT, PROVIDING ACCESS TO WIDER MOVEMENT INFRASTRUCTURE;
3. SECONDARY STREETS SERVING CLUSTERS OF DEVELOPMENT;
4. POTENTIAL LOCATION OF LOCALLY EQUIPPED AREA OF PLAY;
5. FULLY CIRCULATORY PEDESTRIAN / CYCLE MOVEMENT ROUTE;
6. UTILISATION OF SITE LOW POINTS FOR SUSTAINABLE URBAN DRAINAGE SOLUTIONS (TBC);
7. KEY VISUAL CORRIDOR PROVIDING SPIRE VIEWS TO ST. PETERS CHURCH;
8. OUTWARD FACING DEVELOPMENT PROVIDING PASSIVE SURVEILLANCE OVER NEWLY CREATED OPEN SPACE;
9. POSSIBLE EMERGENCY ACCESS VIA NEW ROAD;
10. PROMOTION OF COMMUNITY SPACES IN THE FORM OF A COMMUNITY ORCHARD. OFFERING SPACE FOR SOCIAL INCLUSION AND AND COMMUNITY PURSUITS.





View from Ivy Court looking towards site and potential access



KEY:
 SITE BOUNDARY
 ALL MOVEMENTS ACCESS
 PEDESTRIAN AND CYCLE ACCESS

Site Context and Potential Access Strategy



View from Sycamore Drive looking towards potential site access



View from New Road looking towards existing access

Proposed Transport Strategy

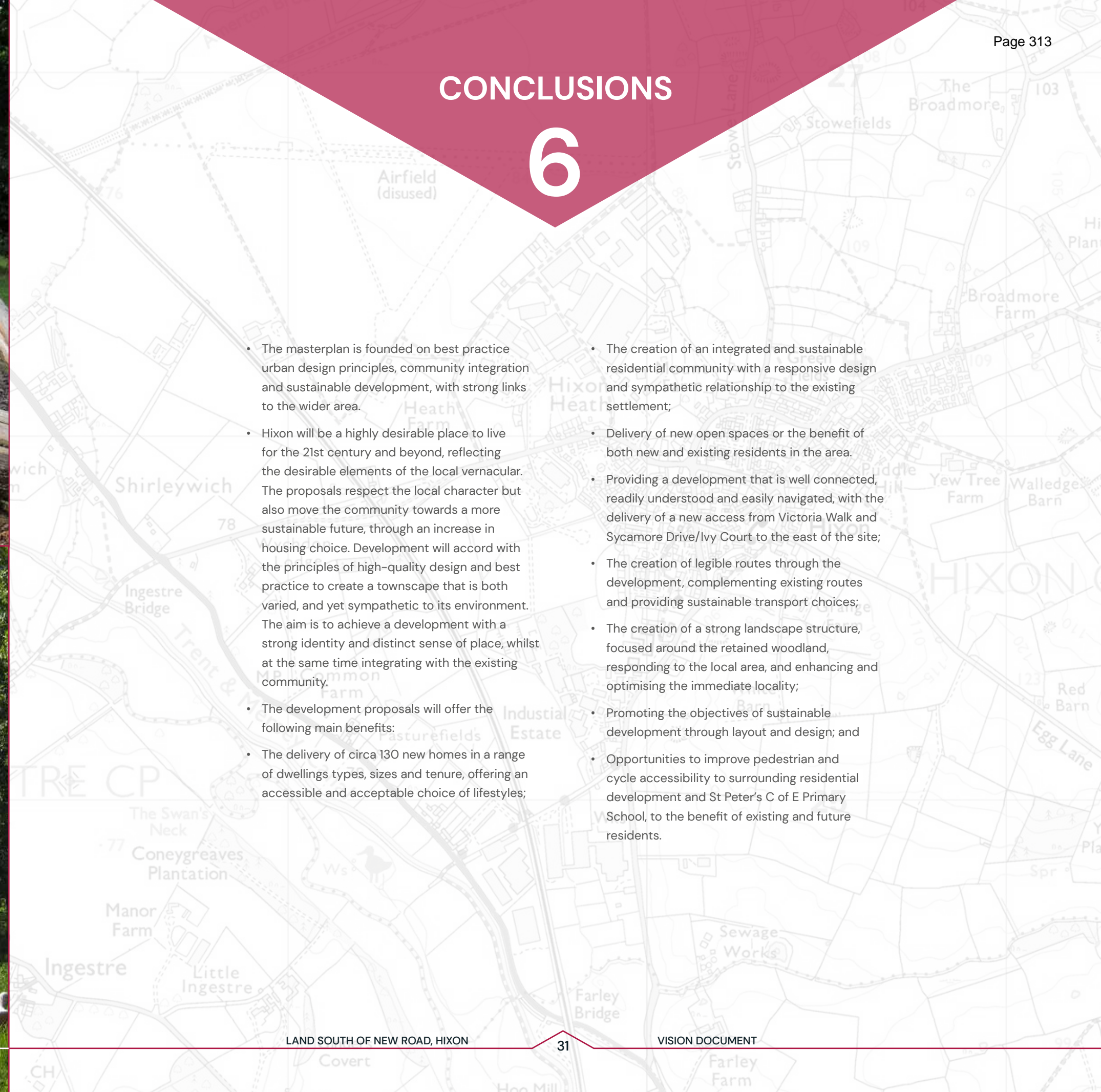
- 5.11 The development at land to the south of New Road, can be accommodated in transport terms and could provide a scheme of wider benefits.
- 5.12 There is an opportunity to provide access into the site from Victoria Walk, via a continuation of the existing carriageway at the turning head in a northwest/ southeast alignment. There is also potential to provide an alternative, or additional access onto New Road, subject to scoping and design evolution.
- 5.13 The site is suitably located with regard to its location in proximity to existing services and facilities within 400 metres of the site as well as a variety of employment opportunities within 1km of the site. High quality pedestrian and cycle links would be provided throughout the development and to provide connections to the existing infrastructure throughout Hixon.
- 5.14 There is potential to integrate and connect to existing footways at Ivy Court and Sycamore Drive through the existing public open space. An onwards footpath connection is provided between Sycamore Drive and the primary school. Significantly, a new footpath where none

currently exists could be provided directly between the site and primary school playing fields subject to negotiations with the council and education trust. The new route could provide a higher standard of route with bound surface and lighting and could additionally accommodate cyclists where the existing public right of way width limits its use to pedestrians only. The provision of a connection will also benefit existing residents of Victoria Walk residential area providing an alternative route to Church Lane.

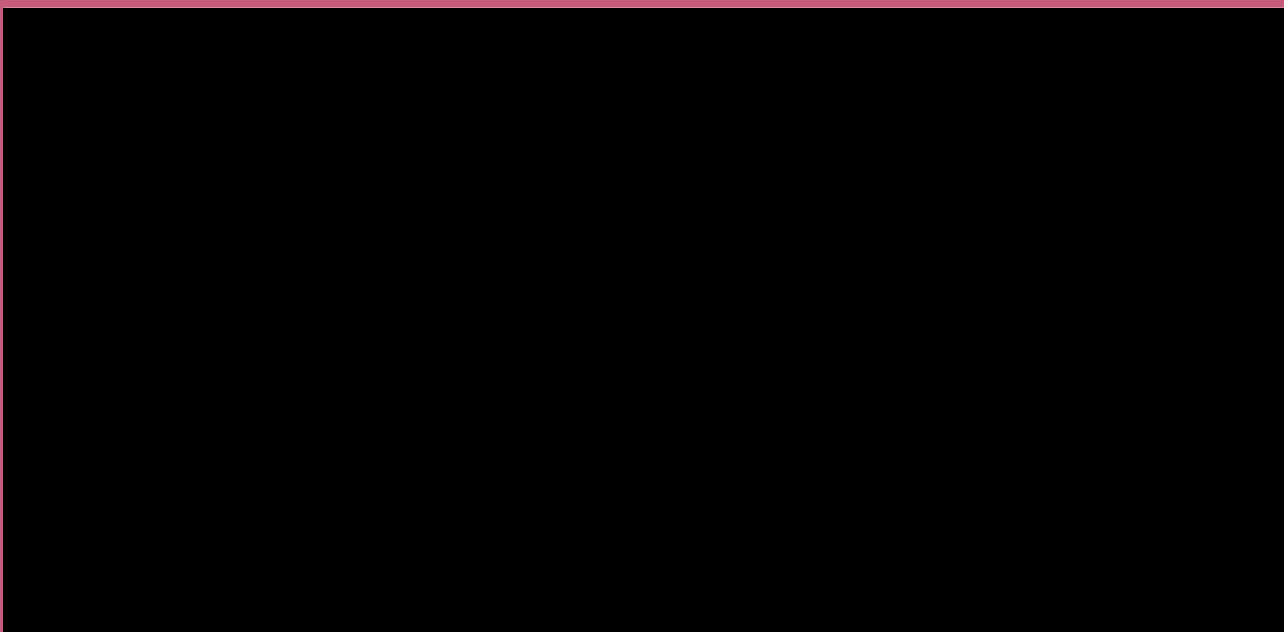
5.15 The expected vehicle trips associated with a scheme of up to homes would not be expected to have a material impact on the local highway network. The inclusion of an element of affordable housing would reduce the expected number of vehicle trips to and from the development at peak times. The development will also be subject to a comprehensive Travel Plan Strategy, designed to influence the travel habits of the site residents from first occupation of the development. This will promote a culture of using sustainable travel modes with incentives and associated management and targeting regimes.

CONCLUSIONS

6



- The masterplan is founded on best practice urban design principles, community integration and sustainable development, with strong links to the wider area.
- Hixon will be a highly desirable place to live for the 21st century and beyond, reflecting the desirable elements of the local vernacular. The proposals respect the local character but also move the community towards a more sustainable future, through an increase in housing choice. Development will accord with the principles of high-quality design and best practice to create a townscape that is both varied, and yet sympathetic to its environment. The aim is to achieve a development with a strong identity and distinct sense of place, whilst at the same time integrating with the existing community.
- The development proposals will offer the following main benefits:
- The delivery of circa 130 new homes in a range of dwellings types, sizes and tenure, offering an accessible and acceptable choice of lifestyles;
- The creation of an integrated and sustainable residential community with a responsive design and sympathetic relationship to the existing settlement;
- Delivery of new open spaces or the benefit of both new and existing residents in the area.
- Providing a development that is well connected, readily understood and easily navigated, with the delivery of a new access from Victoria Walk and Sycamore Drive/Ivy Court to the east of the site;
- The creation of legible routes through the development, complementing existing routes and providing sustainable transport choices;
- The creation of a strong landscape structure, focused around the retained woodland, responding to the local area, and enhancing and optimising the immediate locality;
- Promoting the objectives of sustainable development through layout and design; and
- Opportunities to improve pedestrian and cycle accessibility to surrounding residential development and St Peter's C of E Primary School, to the benefit of existing and future residents.



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Registered Office: [REDACTED]

From: Jason Tait [REDACTED]
Sent: 02 December 2022 11:20
To: Strategic Planning
Subject: Local Plan Review Consultation - Representation on behalf of St Modwen Homes
Attachments: Preferred-Options-Consultation-Response-Form.pdf

Please find attached representations on behalf of St Modwen Homes

We would very much welcome some further discussions with the Council about the comments and suggestions made

Regards

Jason M Tait, MRTPI - Director
planningprospects
planning and development consultancy

[REDACTED]
[REDACTED]

Planning Prospects Limited is registered as a Limited Company in England with Registered No. 5726404.

Registered Office [REDACTED]

Contact Details

Full name (required): Jason Tait

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): Planning Prospects Ltd on behalf of St Modwen Homes

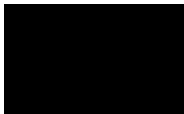
Tick the box that is relevant to you:

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

- Under 18
- 18-24
- 25-34
- 35-44
- 45-54
- 55-64
- 65+

Prefer not to say / not applicable

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



Contents

The Local Plan Preferred Options includes the topics listed below.

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

- **Vision and Objectives** - page 5
- **Development Strategy and Climate Change Response** - page 6
- **Meecebrook Garden Community** - page 9
- **Site Allocation Policies** - page 10
- **Economy Policies** - page 14
- **Housing Policies** - page 16
- **Design and Infrastructure Policies** - page 18
- **Environment Policies** - page 19
- **Connections** - page 20
- **Evidence Base** - page 21
- **General Comments** - page 22

All of the local plan documents and the Local Plan 2020-2040: Preferred Options document are available here: <https://www.staffordbc.gov.uk/local-plan>

Vision and Objectives

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

"A prosperous and attractive borough with strong communities."

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

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

Local Plan Preferred Options document reference: Page 12

- Contribute to Stafford Borough being net zero carbon by ensuring that development mitigates and adapts to climate change and is future proof.
- To develop a high value, high skill, innovative and sustainable economy.
- To strengthen our town centres through a quality environment and flexible mix of uses.
- To deliver sustainable economic and housing growth to provide income and jobs.
- To deliver infrastructure led growth supported by accessible services and facilities.
- To provide an attractive place to live and work and support strong communities that promote health and wellbeing.
- To increase and enhance green and blue infrastructure in the borough and to enable greater access to it while improving the natural environment and biodiversity.
- To secure high-quality design.

Development Strategy and Climate Change Response

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

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

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

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

Local Plan Preferred Options document reference: Pages 19 to 40

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

Yes / No

Policy 1 Comments:

N/A

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:

N/A

Policy 3. Development in the open countryside - general principles

Yes / No

Policy 3 Comments:

N/A

Policy 4. Climate change development requirements

Yes / No

Policy 4 Comments:

The principles and aims of the policy are supported however it is questioned as to whether the Local Plan is the appropriate mechanism for sustainable building requirements to be set. Building Regulations have been enhanced in recent years and set standards for sustainable building which apply on an equal basis nationally. The justification to have requirements in the Local Plan which exceed national Building Regulations has not been clearly set out in the Local Plan. Building Regulations already require the design of buildings to incorporate highly energy efficient fabric measures, lighting and ventilation. Building Regulations also already have requirements which mean that all new homes from 2025 will not be able to use gas or oil heating systems. Duplicating these requirements is not necessary in the Local Plan. With the Local Plan extending over a plan period to 2040, it is also not flexible enough to respond to changes in building technologies and standards.

Of particular concern is the extent to which these enhanced standard have been taken into account in terms of their effect on the viable delivery of new homes over the plan period or the extent to which they may influence investment decisions in the wider housing market area, making Stafford a less attractive location to invest in new housing. In setting other planning requirements such as affordable housing for example, the Plan recognises that there are significant differences across the Borough to viably deliver housing, including especially more challenging delivery within Stafford Town for example. It is not clear how the Local Plan has properly evaluated the implications of these additional standards on the delivery of housing.

Regarding the Policy itself, the following is of specific concern regarding the wording proposed;

Criterion A applies to all building of any scale and type. It is absolute in its requirement to require all resources to be used efficiently as part of the construction and indeed the operation of the building. With regards to Major development, these must produce an embodied carbon assessment, but it sets no requirement as to what such an assessment will be required to demonstrate – the criterion is not clear or precise in any of these requirements.

For residential development it requires all dwellings to be net zero operational for energy. Requirement B1 for non-fossil fuel combustion is already a requirement of building regulations and doesn't need to be repeated. Requirements under B2 are ultimately arbitrary and there is no explanation or justification as to why these enhanced levels are imposed or the specified level set. The requirement to maximise all on site renewable energy generation is unduly onerous and excessive. Reference to standards outside of the planning process such as Passivhaus should be avoided as these standards can change over time, outside of the Local Plan process.

Under criterion D it is unclear as to the definition of residual energy demand. If it relates to the energy demand minus on site ability to provide for renewable energy, then the policy doesn't seem to make sense by suggesting that residual demand should also be met through on-site renewable schemes. It is also unclear how the council can expect that off-site provision of residual energy demands could be only through off site renewable energy provision.

Regarding "Other Requirements" in the policy, the water efficiency target is noted and is an exception allowed for in national policy to be incorporated into Local Plan policy. However, E3 seeks to require all opportunities to incorporate rainwater harvesting, grey water recycling, green roofs, recycled materials, etc to have been maximised is unduly onerous and unlikely to be able to be achieved on all developments.

Changes sought;

The Policy should be reconsidered in the context of Building Regulation requirements which are already applied nationally on a consistent basis.

In any event, the implications for the policy requirements should be fully considered in terms of their effect on housing delivery and viability, particularly within the low market value areas of the Borough.

The policy should at least be adjusted to be more flexible and not set absolute requirements for all provisions to be "maximised" for all developments as this is unlikely to be able to be achieved and is unrealistic.

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?

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:

N/A

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:

N/A

Policy 10. West of Stafford

Yes / No

Policy 10 Comments:

N/A

Policy 11. Stafford Station GatewayYes / No**Policy 11 Comments:**

The allocation of land at Stafford Station Gateway is supported. St Modwen Homes own part of the site and are keen to work with other stakeholders to bring forward development on the site in line with the policy and vision.

The site has a very real potential to deliver a high quality mixed use development in a sustainable location in the heart of the town. The aims and objectives of the scheme are commendable and the aspirations, vision and strategic objectives for the area are all well aligned to planning and other wider economic and social objectives such that the scheme will be highly beneficial to the Town along this important gateway approach.

The Council are already progressing a Regeneration Framework Document which St Modwen Homes have commented upon recently and will be a material consideration in determining future planning applications. The Framework includes detailed guidance for the masterplanning and development of the site with the site broken down into key character areas and opportunity sites. The Policy generally aligns with the Framework, but there is considerable cross over and some detail within Policy 11 which is better set out within the Framework in our view.

The development is undoubtedly going to be delivered in phases and it is helpful that the policy recognises that. Its co-ordinated masterplanning would still be achieved with policy requirements for any application to show its relationship to the wider site and masterplan but could go further to commit the Borough and County land holdings to the development as main landowners.

In terms of the specific criteria of “key requirements” for the development we would comment as follows;

1 – Pedestrian and Cycle links through the scheme – supported

2 – New toucan crossing – potentially a too detailed of a requirement for inclusion in the policy and more suited to the Framework

3 – Station square requirement – supported

4 – Close Castle Street to through traffic – supported

5 – Off site pedestrian and cycle links on Newport Road – no objection, but assume this is with highway land such that the delivery of such improvements could be co-ordinated through off site financial contributions

6 – Development density – the principle of higher density being located closer to the new station western entrance is supported, albeit the Framework does include some variance to this. The suggestion that development steps down in density to the north is somewhat confusing and may be an error and should in fact refer to the west. Reference to development density is better explored in the Framework as there are a number of influences on specific parts of the site. The design aspirations for this development are very positive and these may well necessitate a more flexible and innovative approach to development density such that prescriptions on development density in the policy here could be an undue constraint on design quality.

7 – Landscape led development and FRA – landscape (both hard and soft) will undoubtedly be an influence on the development but with the potential for a distinctive high quality development of some density, will be one of a number of factors to consider in bringing the site forward. Some landscape removal will be essential to achieve the design aspirations of the Framework including creation of public access to the Doxey Brook, but new hard and soft landscaping can still achieve and deliver a high quality development. Reference is made here to the need for a site allocation wide flood risk assessment, but the Framework confirms this important supporting evidence for the allocation of the site has been completed and that flood risk doesn't amount to a material constraint on the development of the site as potentially first thought – the flood assessment work should be referenced in the Local Plan and included in its evidence base.

8 – Mix of apartments and houses – the mix of new homes is supported. With reference to the Framework the illustrative masterplan coupled with the precedent images within that document, sets out what could be a highly attractive place to live. The aspirations for higher density residential areas includes the potential for new ways of living which St Modwen would support with higher densities for new homes, with shared private communal and amenity spaces. These urban living concepts could helpfully be referenced in the policy as the site offers greater potential for more innovation in urban design than traditional houses and apartments.

9 – Retail provision – noted

10 – Cross reference to Framework – noted

In addition to the above, reference is made in Criterion B to the need for the development to contribute to school expansion as required to accommodate pupils from the proposed development. This duplicates the requirement placed upon all developments under Policy 37 and can be removed here.

Changes Sought;

The Policy could be simplified with more of the detail contained within the Framework.

The policy should confirm commitment from the Borough and County to the scheme and inclusion of their land to the development as main landowners.

New toucan crossing requirement too detailed requirement for inclusion in the policy and more suited to the Framework.

Off site pedestrian and cycle links on Newport Road should be clarified and subject to financial contributions.

Development density is better explained and explored in the SPD as there are a number of influences on specific parts of the site.

The supporting FRA evidence for the allocation of the site should be referenced in the Local Plan and included in the evidence base.

Additional innovative urban living concepts should be referenced in the Policy in addition to traditional houses and apartments.

Criterion B requiring education contributions should be deleted as it duplicates the requirement placed upon all developments under Policy 37.

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:

N/A

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

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

Yes / No

Policy 14 Comments:

N/A

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?

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:

N/A

Housing Policies

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

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

Do you agree with this policy?

Yes / No

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

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

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

Local Plan Preferred Options document reference: pages 74 to 76

Comments:

In general, the Policy is supported and it is particularly welcomed that the Policy provides for a varied requirement for affordable housing provision, depending upon the housing values zones recognised in the Whole Plan Viability Assessment.

It is suggested however in some instances the policy is too prescriptive and would fail to provide sufficient flexibility on sites or in certain locations in the Borough where a different approach to the provision of affordable housing could be preferable.

Criterion C regarding clustering (max 8) should be deleted, although the principle of some distribution across any site is recognised and supported.

Criterion D whilst supported in principle should note that in some instances affordable housing has different build requirements often by the Registered Provider and therefore sometimes by necessity are slightly different in appearance.

The proposed tenure mix should be deleted – it is not appropriate to require all development across the Borough to provide for this mix (noting with exception the First Homes stemming from national policy) – tenure mix requirements could vary by location and over the duration of the plan period.

Better practice here for this policy is to remove the above elements and place such requirement within an accompany affordable housing Framework.

Changes Sought;

References to clustering, design assimilation and tenure mix should be removed from the policy – a Supplementary Planning Document (SPD) should be referenced and produced on affordable housing to sit alongside Local Plan Policy.

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?

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:

Policy 24 – Homes for Life

The policy sets out specific requirements of accessible and adaptable dwellings. It also confirms the introduction of NDSS for internal standards as well as specific provision for private external space for new housing. Whilst the general aims of the policy are noted, concerns are expressed on the following matters.

It is unclear as to why 10% has been chosen as the percentage requirement for the optional Buildings Regulations Part M4(2) standard for accessible and adaptable dwellings. Some justification needs to be given as to this figure noting guidance within PPG Para 002 Reference ID 56-002-20160519. Some consideration needs to be given as to the effect of this additional requirement on the viable delivery of new homes. Likewise where the Part M4(3) is imposed on affordable dwellings, the impact on delivery needs to be considered. The 10% requirement here is noted in the accompanying text to be higher than the expected need which doesn't seem reasonable.

Whilst the introduction of NDSS is not objected to in principle, again its implications for housing delivery and viability need to be considered in the Local Plan evidence base.

Of principal concern in this policy is the requirement it imposes for external private amenity space for the all new housing. The requirements are excessive and unduly restrictive. They suppress the provision of new innovative types of urban living where occupiers often have less of a requirement for private amenity space and often prefer shared communal spaces which can also be private. Indeed it is worth noting that the design aspirations for the development of the Stafford Station Gateway within the Council's emerging Framework document includes for such types of living spaces and new homes, with precedents which would not be able to meet these standards but yet would deliver highly commendable places to live which are known to be very successful. Such prescriptive requirements for private amenity garden spaces are so often the reason for uniform housing estate like designs and layouts and they only serve to stifle innovation in design, layout and masterplanning.

Changes sought;

Evidence is required to support the provision of the percentage requirements set out in the Policy.

The requirements for external private amenity space should be deleted from the policy or at least reworded to apply more flexibly to encourage a greater range and types of dwelling accommodation and associated amenity space.

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:

N/A

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:

Policy 46 Green and Blue Infrastructure Network

The Policy aspirations to protect, enhance and extend the existing network is recognised and supported. However, concerns are set out here regarding the requirements under criterion C which requires all residential development of 10 or more dwellings to provide 32sq m of open space per person. It is not evident that the spatial implications of this requirement have been fully considered in setting out the plan's development allocations and particularly their potential dwelling capacities, particularly within higher density developments such as the Stafford Station Gateway site for example. Whilst that development has undoubted potential to create new attractive green and blue infrastructure, these quantitative requirements could fundamentally affect the development delivery and stifle more innovative urban living solutions for the site, as well as affecting the overall scale of development which may be achievable on the site. The policy is applied without any flexibility in circumstances where the local context for the site could already be generously provided for in terms of provision of local green space.

Changes sought;

The green space requirement should be removed and applied more flexibly on a site by site basis given consideration of the overall development aims and aspirations for the specific site and its local context.

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

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:

N/A

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

Yes / No

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

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

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

Comments:

See comments elsewhere in these representations which suggest further work needed on the supporting evidence base

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.

N/A

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

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

Completed forms can be submitted by email to:

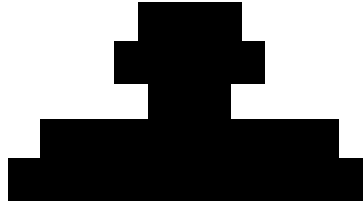
strategicplanningconsultations@staffordbc.gov.uk

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

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

From: Murrey Preston [REDACTED]
Sent: 12 December 2022 07:13
To: Strategic Planning
Cc: [REDACTED]
Subject: Re: SBC New Local Plan 2020 - 2040 Consultation Response to Preferred Options Report
Attachments: SBC NEW LOCAL PLAN 2020-2040 CONSULTATION RESPONSE TO PREFERRED OPTIONS REPORT 10.12.22.docx; SBLP CONSULTATION RESPONSE Appendix 1.pdf; SBLP CONSULTATION RESPONSE Appendix 2.pdf; SBLP CONSULTATION RESPONSE Appendix 3.pdf; SBLP CONSULTATION RESPONSE Appendix 4.pdf

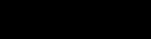
Good Morning [REDACTED] – Thank you very much indeed for giving my wife and I the opportunity to respond to the consultation on the Preferred Options Report; we appreciate it immensely. Our email response is attached together with four appendices. A hard copy was also hand-delivered to the Civic Offices yesterday. I shall be immensely grateful if when they have a moment someone would very kindly acknowledge their receipt. Very best Murrey Preston



Stafford Borough Council
Civic Centre
Stafford ST16 3AQ

10th December 2022

By email and by hand

Dear 

TOWN AND COUNTRY PLANNING ACT 1990

REPRESENTATION CONSULTATION RESPONSE TO STAFFORD BOROUGH LOCAL PLAN 2020 – 2040 –PREFERRED OPTIONS

Background

This representation relates to a parcel of land to the north of Trent Road, Stone. The land is in my sole control. This representation is set out as follows:

- Section 1: Housing Need
- Section 2: Draft Planning Policy 12: Other housing and employment allocations: Land North of Trent Road (LNTR)
- Section 3: Land between and the Fillybrooks and Trent Road (LBFTRS)
- Section 4: Proposed Changes to the Local Plan (Preferred Options)
- Section 5: Comments relating to the Planning Policies in the Local Plan (Preferred Options)

1. Housing Need

- 1.1. The Government currently has a target to deliver 300,000 new homes each year to meet housing need, address the backlog of housing delivery, provide for projected population growth and also support the economic growth ambitions of the country.
- 1.2. In 2020/21, 216,000 new homes were delivered and this was in part hindered due to delays and disruption caused by Covid-19. Even before the Housing White Paper was published in August 2020, there has been a recognition of the need to bolster housebuilding, reduce unnecessary bureaucracy and streamline the planning system.

There has been a clear effort by Government to make sustainability a core feature of housing and planning. Pillar Two of the Planning White Paper is *'Planning for beautiful and sustainable places'*, which sets out the importance of addressing the challenges of climate change and the environmental impacts of development. There has been an increased focus on ensuring that development is located appropriately in relation to transport infrastructure and key public facilities, facilitating a modal shift from the car, to active travel and public transport. This can be achieved by encouraging higher densities in the best-connected locations, such as the opportunity afforded by the proposed development on the LNTR.

- 1.3. The *'National Planning Policy Framework'* (NPPF) is clear on the need to make the most effective use of land. Paragraph 119 states that planning policies and decisions should promote the effective use of land in meeting the need for homes and other uses, which safeguards and improves the environment, ensuring safe and healthy living conditions.
- 1.4. Paragraph 124 goes on to state that when ensuring the efficient use of land; the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating this, should be taken into account.
- 1.5. The *'Planning Practice Guidance'* (PPG) accompanies and provides clarification on the NPPF. Of particular relevance is the guidance around planning for higher density development. This outlines that appropriate densities should be identified with reference to a site's proximity to facilities, and public transport hubs, taking into consideration the services and destinations available.
- 1.6. It is acknowledged that there is a housing crisis in the UK, and the country desperately needs many more homes. Britain's young first-time buyers deserve to experience the same quality of life that previous generations have enjoyed and that includes the opportunity to own their own home. The average age of a first-time home buyer is 32, with many not expecting to get a foot on the housing ladder until they reach 37. There is a substantial need for affordable housing which the younger generation are able to afford.
- 1.7. The Stafford Borough Local Council's *'Strategic Housing Market Assessment'* (SHMA) identified a need for 210 new affordable dwellings per annum. The Council's *'Annual Monitoring Report'* (AMR) (2019/2021) confirms that since the start of the Plan period, the average annual delivery of affordable homes has fallen below its target (paragraph 4.12). Table 5 *'Affordable Housing Delivery'* of the AMR sets out the number of affordable homes delivered between 2011 and 2021. An average of 165 dwellings per annum have been delivered. This falls considerably short (45 dwellings) of the need across the district for 210 affordable homes per annum.
- 1.8. The SHMA confirms a requirement to build 21 affordable dwellings per annum in Stone within the Plan period, with the strongest need for smaller one and two bedrooed affordable properties. These low-cost affordable starter homes are desperately needed in Stone, and confirmed at Paragraph 28.4 of the Stone Neighbourhood Plan, *'There is also a pressing need for more affordable housing to meet current and future demand.'*

2. Draft Planning Policy 12: Other housing and employment allocations:

Draft Site Allocation: Land North of Trent Road (LNTR)

- 2.1. The land adjacent to Trent Road within my ownership consists of two contiguous parcels of land extending in total to 1.67ha. Woodland Fields (SHELAA STO08 and STO10) (1.25ha) lies to the east and has been allocated for housing in the *Draft Policy 12 Other Housing and land allocation - 'Land North of Trent Road' (LNTR) (SHELAA STO08 and STO10)* for 20 houses.
- 2.2. The land to the west between the Fillybrooks and Trent Road (SHELAA STO11) ('LBFTRS'), known as Woodland Court falls outside the allocation. **(Appendix 1).**
- 2.3. The principle of development of the wider Trent Road Site has previously been accepted and supported through the *'Stafford Borough Local Plan 2001 – 2011'* (Appendix 2). Paragraph 6.24 of the Planning Inspector's Report commented on the Council's intention to exclude the site from the Stone Residential Development Boundary: *"I find it somewhat difficult therefore to comprehend the rationale behind the current stance, especially as the neighbouring industrial premises fall within the RDB. I accept the land is open at present. However, because of the acceptance of its suitability for housing and its adjacency to a built-up area included in the town's RDB, I consider it would be both sensible and reasonable to retain the site in the RDB as shown in the Plan."*
- 2.4. The Council duly allocated the site for housing in the adopted *'Stafford Borough Local Plan 2001 - 2011'* under Proposal HP17. Following the adoption of the *'Stafford Borough Local Plan 2011 – 2031'* when the residential development borders were removed, the Site was not included as a development allocation.
- 2.5. The suitability of the Site was acknowledged in the resolutions to grant of both outline and detailed consent in 1989 and 1990 for the Woodland Fields and Woodland Court schemes.
- 2.6. We support *'Draft Policy 12 Other Housing and land allocation - Land at Trent Road' (SHELAA STO8 and STO10)* for 20 houses.

3. Land between the Fillybrooks and Trent Road, Stone (LBFTRS)

- 3.1. Woodland Court (SHELAA STO11) (0.42ha) lies to the west of the wider Trent Road site and falls outside the proposed allocation. This land lies between the Fillybrooks and Trent Road, Stone (LBFTRS). We object to Policy 12 in that LBFTRS has not been allocated for residential development.
- 3.2. The Site lies to the north west of Stone. Access will be off Trent Road. The Site is surrounded by residential development on three sides, with Hartley Close and the

allocated LNTR to the north and the Meadowside development to the east. The Site is bounded by Trent Road to the south and the A34 to the west.

3.3. The principle of residential development on LBFTRS has been long established in the expired resolutions to grant planning consents and '*Stafford Borough Local Plan 2001 - 2011*' allocation, as set out below:

- The LBFTRS gained resolutions to grant outline planning consent subject to a s.106 agreement in October 1989 (application no. 24130) and detailed consent for 28 dwellings in November 1990 (application no. 26033);
- The LBFTRS formed part of the allocation for housing (HP17) in the '*Stafford Borough Local Plan 2001 – 2011*' and also in the 2013 Housing Monitor '*Land for New Homes*' for '39 dwellings'. The allocation was revoked unilaterally by the Council soon afterwards.

3.4. An outline planning application for 7 one-bedroom affordable starter homes was submitted to the Council in August 2021 (Planning ref. 21/34419/OUT) on the LBFTRS. The application remains pending. There have been no technical objections to the planning application from statutory consultees, including the Environment Agency, the Highways Authority and the Council's Tree Officer. The Environment Agency (EA) has not objected to the proposed residential development (**Appendix 4**). This planning application has demonstrated that residential development on LBFTRS can be delivered.

3.5. Our proposal for the development of the LBFTRS is shown on the Illustrative Layout (**Appendix 2**). The features and benefits of the Site include:

- The Land North of Trent Road, Stone is an eminently sustainable location;
- All the homes provided will be designed to a very high standard;
- The overall design will reflect the character of the locality;
- The development will include not less than 14 low-cost affordable starter homes;
- The layout provides for a footpath which will link to the existing footpath on the south side of the road and mean pedestrians can walk in safety for the whole length of Trent Road;
- The layout includes a donation of land to the Highway Authority for road improvements. This will enable the dangerous and awkward turn into Trent Road from the southbound carriageway of the A34 to be made safer and easier;
- The allocation of LBFTRS | the Woodland Court area of the LNTRS for affordable housing will complement and increase the current mix and range available; they are desperately needed in Stone and will help meet the high demand; and
- The Site has enviable transport and highway links and is within easy walking distance of Stone town centre and public transport – both for buses (stops in Newcastle Road) and trains (Stone station accessed by means of the shortcut from the top of Trent Road and across the canal).

- 3.6. The long-established principle of this highly sustainable site, which currently serves no useful purpose, being found perfectly suitable for residential development is therefore undeniable.
- 3.7. Following a review of the Site's capacity and, in accordance with the NPPF, to make the most effective use of the land, it is considered that the Site could accommodate a small-scale development. This comprises 14 one-bedroom affordable starter homes, utilising the same building footprint as the pending planning application (21/34419/OUT).
- 3.8. The proposed low-cost affordable starter homes on LBFTRS are desperately needed in Stone. The dwellings will complement and increase the current housing mix, and will assist in meeting the existing high demand and urgent need for new affordable homes.
- 3.9. We wholeheartedly support the allocation for housing on LBFTRS, not only because the site first gained resolutions to grant outline and detailed planning consent in 1989 – over 30 years ago - and was allocated for residential development in the Stafford Borough Local Plan 2001 - 2011 but also because significant benefits will result in the form of affordable starter homes with a mix of tenures. Some of those could also be 'First Homes' which would be made available for sale to genuine first-time buyers at a discounted price which would be legally secured in perpetuity. That will meet the Council's requirements and in addition much-needed road safety improvements can also result from LBFTRS being allocated.
- 3.10. The LBFTRS is available, suitable and has no constraints which would preclude delivery.

4. Changes to the Stafford Borough Local Plan 2020 – 2040 (Preferred Options)

- 4.1. We request that '*Draft Planning Policy 12 Other housing and land allocation*' is amended as follows:
- Part A: the table that list the proposed allocations should be amended to include the following under the Stone settlement heading:

Site Name	Capacity
Land between the Fillybrooks and Trent Road (STO11)	14

- The map at **Appendix 3** of this representation should be included in Appendix 2: Other Site Allocations of the Local Plan Preferred Options with the following accompanying text:

Site ID: STO11
Site Name: Land between the Fillybrooks and Trent Road (STO11)

Settlement:	Stone
Site Area (ha):	0.42
Land Use:	Housing
Potential Yield:	14 dwellings

Essential Site-Specific Requirements:

- Affordable homes;
- Visibility splays of 2.4m x 43m to be demonstrated;
- Road footway required along the site frontage;
- Improvements to junction of Trent Road and The Fillybrooks to be agreed with the Council;
- Full ecological surveys of grassland area on site should be carried out, along with any required mitigation as a result.

Proposed Access: Accessible from Trent Road.

- 4.2. We request that the Site appraisal included in SHELAA STO11 is amended to remove the text that refers to the Site being unsuitable for development as it is located in the Flood Zone. The Environment Agency has confirmed through the planning application (Planning ref. 21/34419/OUT) that the Site can be delivered, without increasing the flood risk on the Site, or in the immediate surroundings.
- 4.3. As a country we do need to build more housing, crucially, more affordable housing. The 14 one-bedroom affordable starter homes will offer help to people living in rental properties often in dreadful conditions with many on dual incomes unable to afford a mortgage.
- 4.4. In its response to the '*Stone Neighbourhood Plan*' consultation, Stafford Borough Council described the Land North of Trent Road, Stone as having the, '*potential to contribute to the future sustainable development of Stone.*'

5. Comments relating to the Planning Policies in the Local Plan (Preferred Options)

Vision & Objectives:

- 5.1. We wholeheartedly support the Vision for the Local Plan.

Policies 7 & 8: Millmeece Community Village:

- 5.2. In our April 2020 consultation response to the '*Issues and Options Report*' we were implacably opposed to the Council's proposal for a New Garden Community. However, having studied what we consider to be the quite exceptional visionary proposals for the Millmeece Community Village we are now wholeheartedly supportive. Everything about it seems right, and when completed this community village will be a huge asset to the northern half of the Borough. We know Baden Hall well of old and hope there will be no

question of the setting of the listed Hall itself being compromised in any way by the development. We would urge that car parking for the station is prioritised and, if anything, over-provision is made.

Policy 9: North of Stafford:

- 5.3. We pass the Marston Grange development quite often and consider the housing there is somewhat bland and disappointing and that greater use should have been made of the opportunity as envisaged in the Council's '*North of Stafford Strategic Development Masterplan*' document of November 2016 which stated: '*... will design to local character and history and reflect the identity of local surroundings and materials ...*'; '*... good design is a key aspect of sustainable development ...*'; and '*... visually attractive as a result of good architecture ...*'. We support the continuing further development of the North of Stafford allocation but would like to see the Council now ensure the fine words of the development brief: '*... well designed ...*' and that the highest standards of design and materials do actually translate into the aspect of new homes in the development to enhance the attractiveness of the area and that a valuable opportunity to incorporate 'beauty' in them is not lost.

Policy 10: West of Stafford:

- 5.4. We support the proposals for the land west of Stafford.

Policy 11: Stafford Station Gateway:

- 5.5. We have marvelled at the thought and effort that has clearly gone into the presentations; they are brilliant and we doubt they could be bettered. We believe there is every chance the intended and badly-needed re-vitalisation of the town centre will be achieved when the development gets under way and it could not come a moment too soon.

Policy 12: Housing and Employment Land Allocations:

- 5.6. We broadly support these allocations. We consider the Stone housing numbers of 370 to be about right especially bearing in mind the massive development that has taken place to the west of Stone recently.

Policy 15: Stone Countryside Enhancement Area:

- 5.7. We wholeheartedly support these policy proposals.

Should you need any further information please do not hesitate to contact us.

Yours sincerely



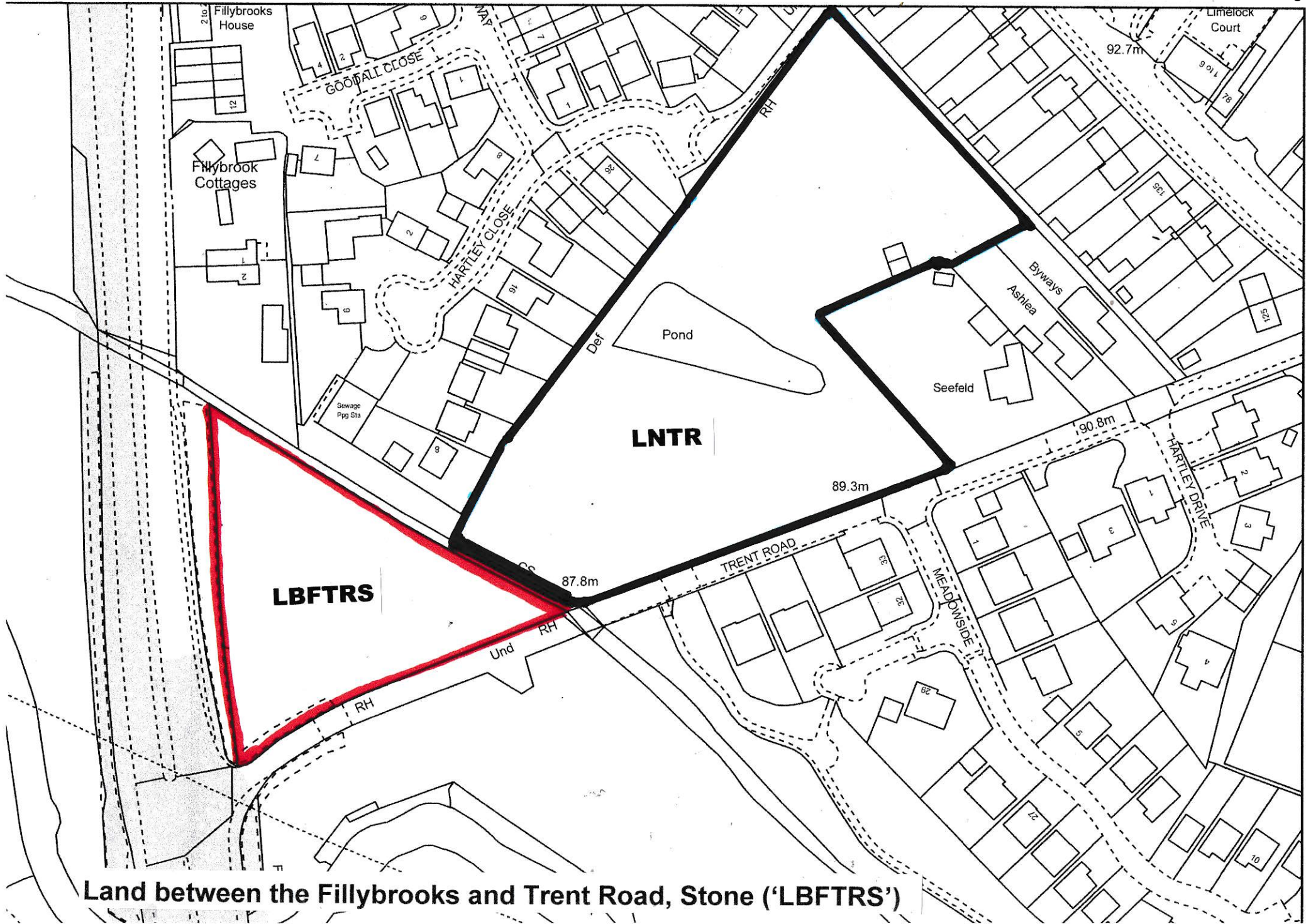
Margaret JH Preston



J Murrey Preston

Enclosures:

- **Appendix 1** Red Line Plan showing the extent of the LBFTRS edged **red** and the LNTR edged black
- **Appendix 2** Drawing illustrating the potential Development Layout
- **Appendix 3** Stone Settlement Boundary shown amended in **red** and hatched black to include the LBFTRS
- **Appendix 4** Letter from the Environment Agency confirming no objection to the proposed development on the LBFTRS



Land between the Fillybrooks and Trent Road, Stone ('LBFTRS')

APPENDIX 2

Figure 50: The indicative layout of the 14 affordable starter homes is shown in the site plan. The indicative layout is based on the site plan and the indicative layout of the 14 affordable starter homes is shown in the site plan. The indicative layout is based on the site plan and the indicative layout of the 14 affordable starter homes is shown in the site plan.

Rev. Description Date
 A BVC Amendments to parking to suit change in unit type. 05.03.21
 B BVC Drawing generation updated. 05.03.21



Site Location Plan 1:2500



Visibility Lines for 30mph Road 40m shown clear from obstruction

Woodland Court A Sustainable Development of 14 affordable starter homes : Ground Floor - parking; 1st and 2nd Floors - one bedroom living accommodation.

Potential for Highway Junction Improvements

Woodland Court Site Plan 1:200



Hewitt & Carr Architects

Client: Murrey Preston

Project: Woodland Court: A Sustainable Development of Affordable Starter Homes on Land off Trent Road, Stone, Staffordshire

Site: Indicative Site Layout : 14 no. Homes

Discipline: Planning

Date: March 2021
Scale: A1: 1:200

Project No: 00482 PL(0)15
Drawing No: B

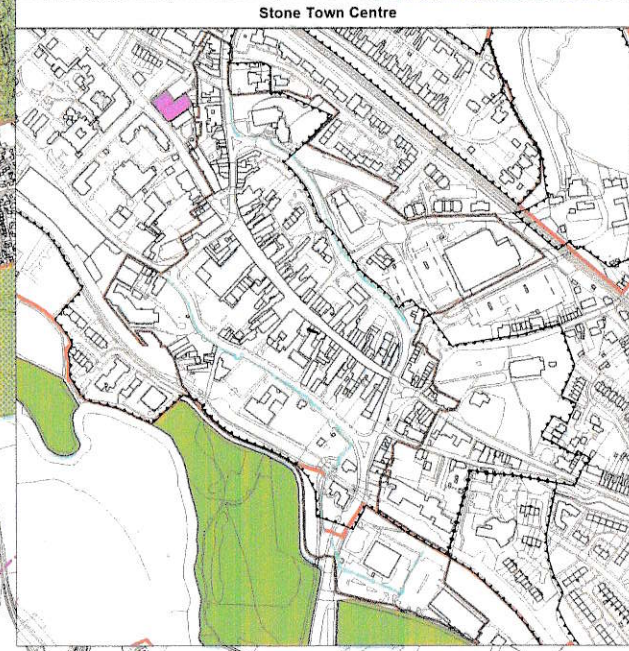


Stone Area Inset
Legend

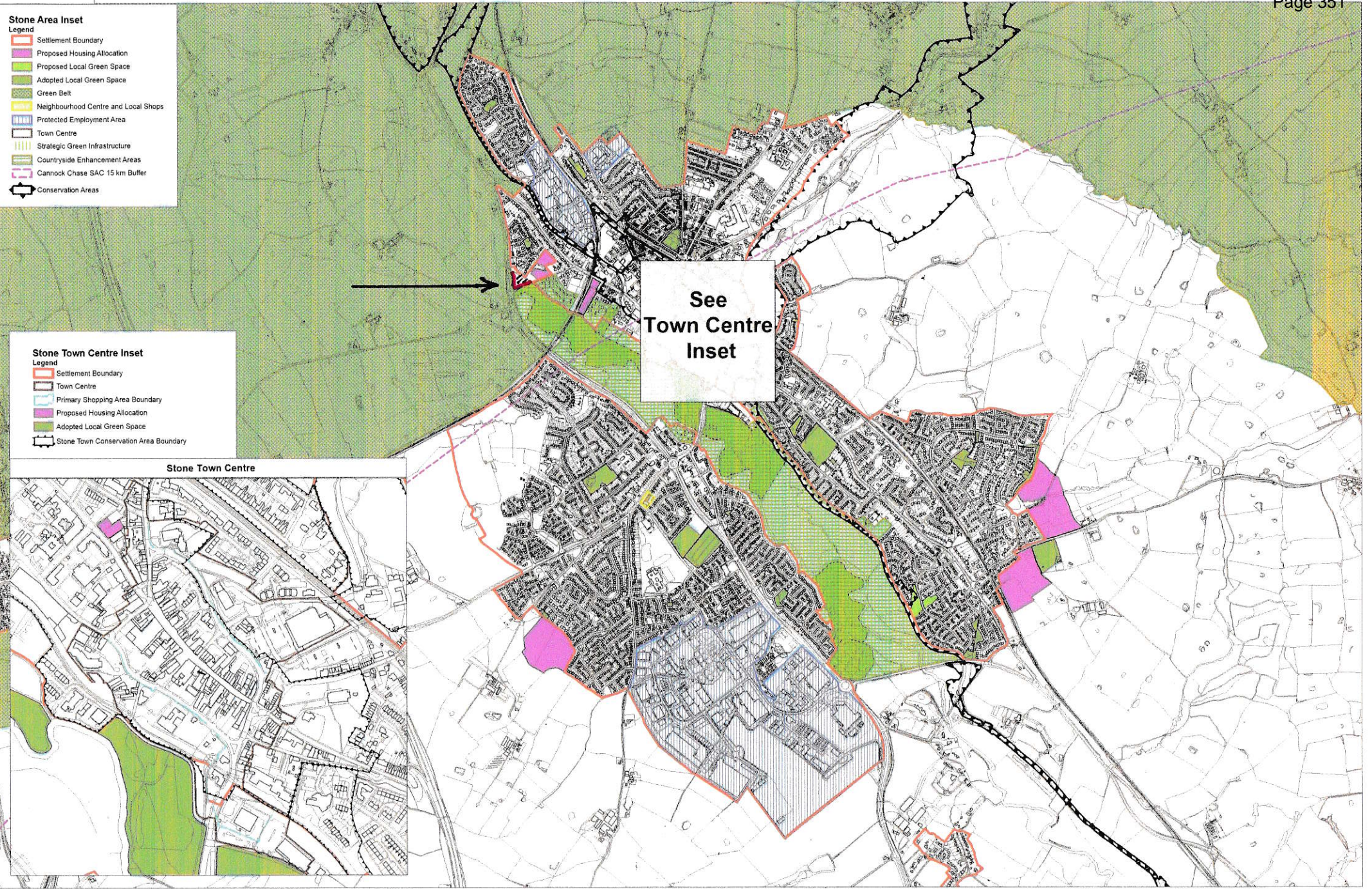
- Settlement Boundary
- Proposed Housing Allocation
- Proposed Local Green Space
- Adopted Local Green Space
- Green Belt
- Neighbourhood Centre and Local Shops
- Protected Employment Area
- Town Centre
- Strategic Green Infrastructure
- Countryside Enhancement Areas
- Cannock Chase SAC 15 km Buffer
- Conservation Areas

Stone Town Centre Inset
Legend

- Settlement Boundary
- Town Centre
- Primary Shopping Area Boundary
- Proposed Housing Allocation
- Adopted Local Green Space
- Stone Town Conservation Area Boundary



**See
Town Centre
Inset**



[REDACTED]
Stafford Borough Council
Development Control
Civic Centre
Riverside
Stafford
Staffordshire
ST16 3AQ

Our ref: UT/2021/119493/02-L01
Your ref: 21/34419/OUT
Date: 23 November 2021

Dear [REDACTED]

ERECTION OF 7NO. AFFORDABLE STARTER HOMES - FRA SUBMITTED

LAND NORTH OF TRENT ROAD, TRENT ROAD, STONE

Thank you for referring the above application which was received on 22 November 2021.

In light of the information submitted we are now in a position to withdraw our objection. We have the following comments to make:

Flood Risk

We have reviewed the Flood Risk Assessment (FRA) by Stantec, ref. 332510850/4002, Rev A, dated November 2021 submitted in support of the above application. The FRA addresses the concerns raised in our previous response dated 07 October 2021.

Therefore, the proposed development will only meet the requirements of the National Planning Policy Framework in relation to flood risk if the following planning condition is included:

Condition

The development shall be carried out in accordance with the submitted Flood Risk Assessment by Stantec, ref. 332510850/4002, Rev A, dated November 2021 and the following mitigation measures it details:

- Finished floor levels shall be set no lower than 87.82 metres above Ordnance Datum (AOD)

These mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the scheme's timing/phasing arrangements. The

[REDACTED]
Cont/d..

measures detailed above shall be retained and maintained thereafter throughout the lifetime of the development.

Reasons

To reduce the risk of flooding to the proposed development and future occupants.

Advice to Applicant

The Environment Agency operates a free flood warning service. The service offers three levels of flood warning and can give the applicant vital time to prepare their property for flooding. Warnings can be received by telephone, text message and email. To sign up call Floodline on [REDACTED] or visit www.gov.uk/flood.

Groundwater & Contamination

In our previous response (letter ref. UT/2021/119493/01-L01, dated 07 October 2021) we provided detailed comments in relation to the protection of 'Controlled Waters' and recommended the following planning condition:

Condition

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the local planning authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to, and approved in writing by, the local planning authority. The remediation strategy shall be implemented as approved.

Reason

To ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution from previously unidentified contamination sources at the development site. This is in line with paragraph 174 of the National Planning Policy Framework.

Finally, in accordance with the planning practice guidance (determining a planning application, paragraph 019), please notify us by email within two weeks of a decision being made or application withdrawn. Please provide us with a URL of the decision notice, or an electronic copy of the decision notice or outcome.

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

Yours faithfully

[REDACTED]

[REDACTED]

End

From: Kathryn McCain
Sent: 07 December 2022 09:56
To: SPP Consultations
Subject: 0202116 - General - Caravan Club Monitoring - General - Caravan Club - Tplan - Planning
Attachments: High Onn Site Location Plan.pdf; Strafford Borough Council - High Onn - Representations.pdf

Dear Planning

Further to the invitation to comment on the Stafford Local Plan 2020-2040 Preferred Options Document, please find attached our representations made on behalf of our client the Caravan and Motorhome Club, and a map of the Clubs campsite in High Onn for reference.

I trust the above is self-explanatory, however, do let me know if you have any queries.

Kind Regards,

Kathryn McCain
BA (Hons)
Senior Planner
Planning

Rapleys LLP

London | Birmingham | Bristol | Cambridge | Edinburgh | Huntingdon | Manchester



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Strategic Planning
Strafford Borough Council
The Civic Centre
Riverside, Strafford
ST16 3AQ

Our ref: KRM/0202116
Your ref:
Date: 29 November 2022

Dear Sirs/Madam,

Re: Representations to Stafford Borough Council's Local Plan 2020-2040 Preferred Options Document on behalf of the Caravan and Motorhome Club.

This letter contains our representations to Stafford Borough Council's Local Plan 2020-2040 Preferred Options Document. The Caravan and Motorhome Club (the 'Club') has a single site in the local authority area at High Onn. The Club would like to have the option of establishing glamping, lodges and pods on site.

A brief commentary of the site and its surroundings is listed below.

Site and Surrounding Area

High Onn Caravan and Motorhome Club Campsite is located on the western side of New Road within the open countryside and within a ZAC 15 km Zone. The site is predominantly surrounded by agricultural land, with limited built development in the vicinity. The site itself is largely screened from view by existing trees, hedges and vegetation.

There are a number of locally and statutorily listed heritage assets in the vicinity of the site including Wheaton Aston Airfield, Little Onn Hall Gardens, Church Eaton and the Tretton to Whitchurch Roman Road to the south and southeast of the site.

Planning Policy

Overall planning policy needs to be correctly worded as to allow for the Club, an important rural economy business, to develop and improve their site to ensure its long-term viability and to ensure the site can be adapted and upgraded to meet the needs and standards of its users. Draft Policy 3 (Development in the open countryside – general principles) allows tourism development and recreation uses appropriate to rural location in the open countryside and the Club is supportive of this principle. However, this policy is high level and whilst the principle

[REDACTED]

[REDACTED]

allows for intensification of caravan sites, additional detail is required to provide the correct level of comfort for our Client.

This policy should include an additional subsection in which glamping, pods and lodges are supported, as are ancillary uses such as, shower blocks, storage areas and reception buildings, where they are of an appropriate scale and design. Such ancillary development allows The Club to continue to provide a level of service which their members require and expect.

The above is of particular importance when considered in conjunction with draft Policy 21 (Tourism Development) which allows for small scale tourism and visitor accommodation proposals outside of settlement boundaries at a scale and type appropriate to their location and where they respect the character of the countryside. Allowances should be made within draft Policy 21 for the provision of glamping, pods, lodges and ancillary uses and buildings that support the needs and long-term viability of the associated tourism accommodation.

The presence of the Caravan and Motorhome Club helps provide economic benefits for the wider area by bringing visitors to the local region. Therefore, the protection and enhancement of important tourist locations will help to ensure the continued economic health and success of the site and local rural economy.

The emerging plan recognises the importance of supporting growth in the visitor economy. However, for this policy to be sound it must be sufficiently detailed as well as flexible to allow businesses to adapt to changing economic trends and changes in the demands of their customers and ensure the long-term viability and diversity of tourism offer in the borough.

Conclusions

It is The Club's primary desire to ensure that policies are included in the Preferred Options Document that support and encourage tourism. Great specificity is desired regarding the way in which improving the quality and diversity of the tourism offer is defined in order to benefit the rural economy in Trafford Brough Council. It would be beneficial for emerging policy to make provision for the upgrading of existing camping and caravan sites. Ideally making specific reference to the provision and adaptation of pods, lodges, glamping and ancillary buildings. Overall, this ensures the future viability of the Club, and supports the tourism industry within Trafford Borough Council.

We request that the contents of these representations are fully considered as part of the current consultation.

Please send all correspondences and notification of future consultations to the details below.

Yours sincerely,



Kathryn McCain

BA (Hons)

Senior Planner





- Part A

From: James Pyrah [REDACTED]
Sent: 02 December 2022 16:35
To: Strategic Planning
Subject: Consultation Supporting Information - Local Plan 2020-2040
Attachments: SSE Plan Great Brigeford.pdf; SSE Plan Ladfordfields.pdf; SSE Plan Seighford.pdf

Good Afternoon

Further to the online consultation that I completed this afternoon on behalf of Seighford Settled Estate, please see the attached plans referenced in my comments, as listed below:

1. Proposed extended settlement boundary for Seighford
2. Proposed extended settlement boundary for Great Bridgeford
3. Proposed extended employment allocation for land at Ladfordfields

I trust this is in order but if you require any further information, please do not hesitate to contact me.

Kind regards

James

JAMES PYRAH MRICS FAAV
ASSOCIATE DIRECTOR

ROBSON & LIDDLE (RURAL) LIMITED
[REDACTED]

W: www.robsonandliddle.co.uk

- Part B

From: Preferred Options Consultation [REDACTED]
Sent: 02 December 2022 16:09
To: Strategic Planning Consultations
Subject: Preferred Options Consultation - Submitted Response

Full name: **James Pyrah**

Email: [REDACTED]

Agents and Developers

Organisation or Company: **Seighford Settled Estate**

Age: [REDACTED]

Added to database: [REDACTED]

Topics (Contents page): **No reply**

Vision and Objectives

Q1 - Which 3 are most important to you? To deliver sustainable economic and housing growth to provide income and jobs., To deliver infrastructure led growth supported by accessible services and facilities. and To provide an attractive place to live and work and support strong communities that promote health and wellbeing.

Development Strategy and Climate Change

Q2 - Do you agree with each of the policies in this chapter?

Policy 1 (Development Strategy): **No reply**

Comments: **No reply**

Policy 2 (Settlement Hierarchy): **Yes**

Comments: **The settlement boundaries for Seighford and Great Bridgeford are too small, restrictive, and do not include all land that is currently non-agricultural. I will email plans to SBC showing the areas that should be incorporated within the settlement boundaries.**

Policy 3 (Development in open countryside): **No reply**

Comments: **No reply**

Policy 4 (Climate change and development requirements): **No reply**

Comments: **No reply**

Policy 5 (Green Belt): **No reply**

Comments: **No reply**

Policy 6 (Neighbourhood plans): **No reply**

Comments: **No reply**

Meecebrook Garden Community

Q3 - Do you agree with proposed new garden community: **No reply**

Comments: **No reply**

Site Allocation Policies

Q4 - Do you agree with the proposed allocations?

Policy 9 (North of Stafford): **No reply**

Comments: **No reply**

Policy 10 (West of Stafford): **No reply**

Comments: **No reply**

Policy 11 (Stafford Station Gateway): **No reply**

Comments: **No reply**

Policy 12 (Other housing and employment land): **No reply**

Comments: **No reply**

Site Allocation Policies (continued)

Q5 - Do you agree with the proposed allocations?

Policy 13 (Local Green Space): **No reply**

Comments: **No reply**

Policy 14 (Penk and Sow): **No reply**

Comments: **No reply**

Policy 15 (Stone Countryside): **No reply**

Comments: **No reply**

Economy Policies

Q6 - The local plan seeks to protect previously allocated and designated industrial land and

support home working and small-scale employment uses. Do you agree: **Yes**

Comments: In relation to policy 16, the retention of allocated employment land is supported but I would suggest that the employment land allocation adjoining Ladfordfields Industrial Estate is extended further to the east. I will send SBC a plan showing the expanded employment allocation area.

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: **There is no scope for the development of affordable housing to be delivered, as it is currently proposed. Social housing should make up a greater proportion of affordable housing, I would suggest 75%.**

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? **Yes**

Comments: **Policy 25 should provide support for landowners and developers to undertake the required local housing needs assessment, as is currently proposed for affordable housing exception sites. Policy 40 addresses renewable and low carbon energy but there is currently no provision for hydrogen creation. This needs to be considered and hydrogen creation should be incorporated into the Local Plan, if deemed viable.**

Environment Policies

Q12 - Do you agree with policies? **Yes**

Comments: **In relation to policy 47, it is imperative that SBC work with landowners to provide off site BNG schemes in order to prevent delays with new housing developments.**

Connections

Q13 - Do you agree with policies? **No reply**

Comments: **No reply**

Evidence Base

Q14 - Have we considered all relevant studies and reports? **No reply**

Comments: **No reply**

Q15 - Do you think there is any further evidence required? **No reply**

Comments: **No reply**

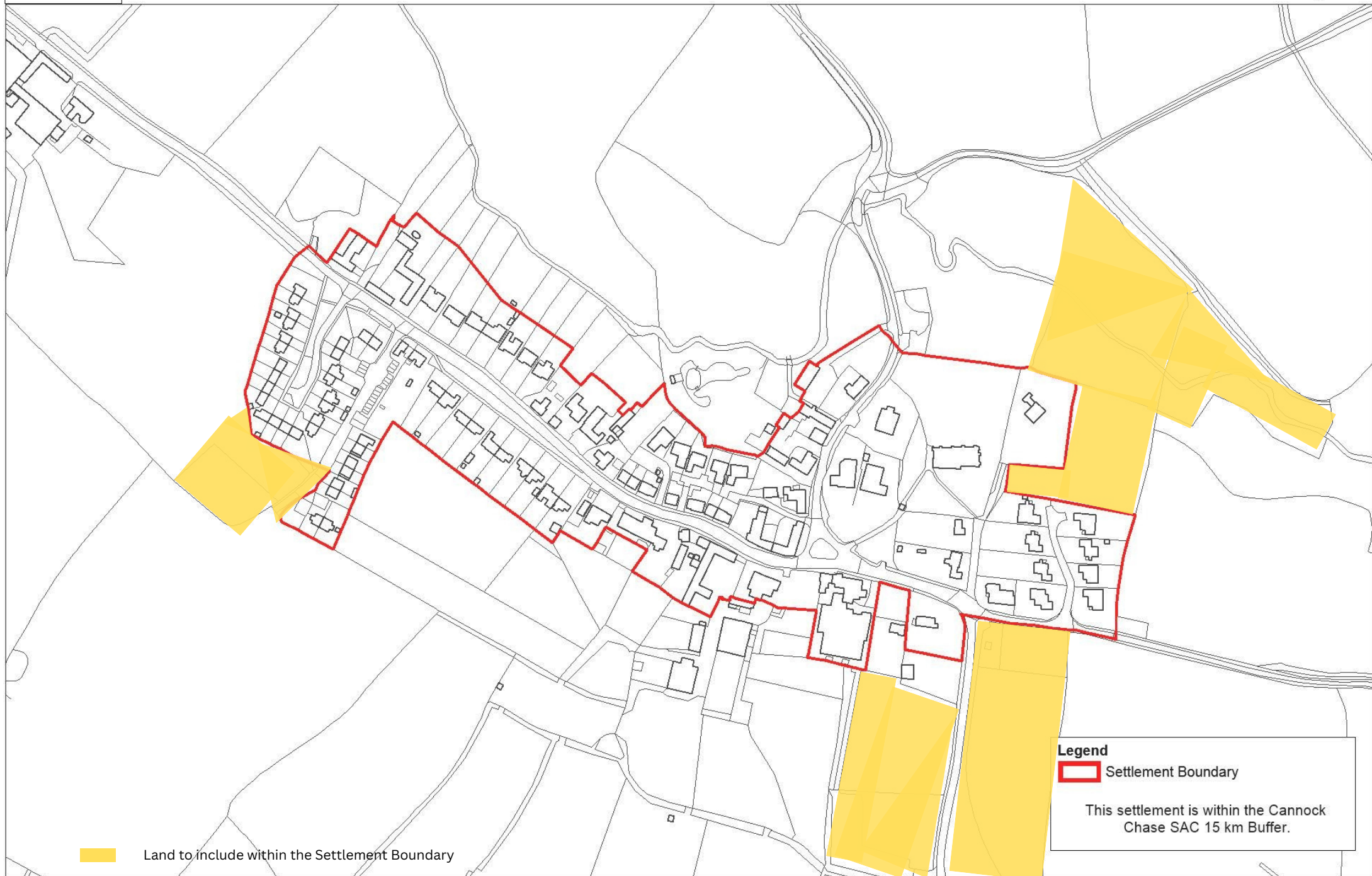
General Comments:

No reply




Seighford

Not to Scale



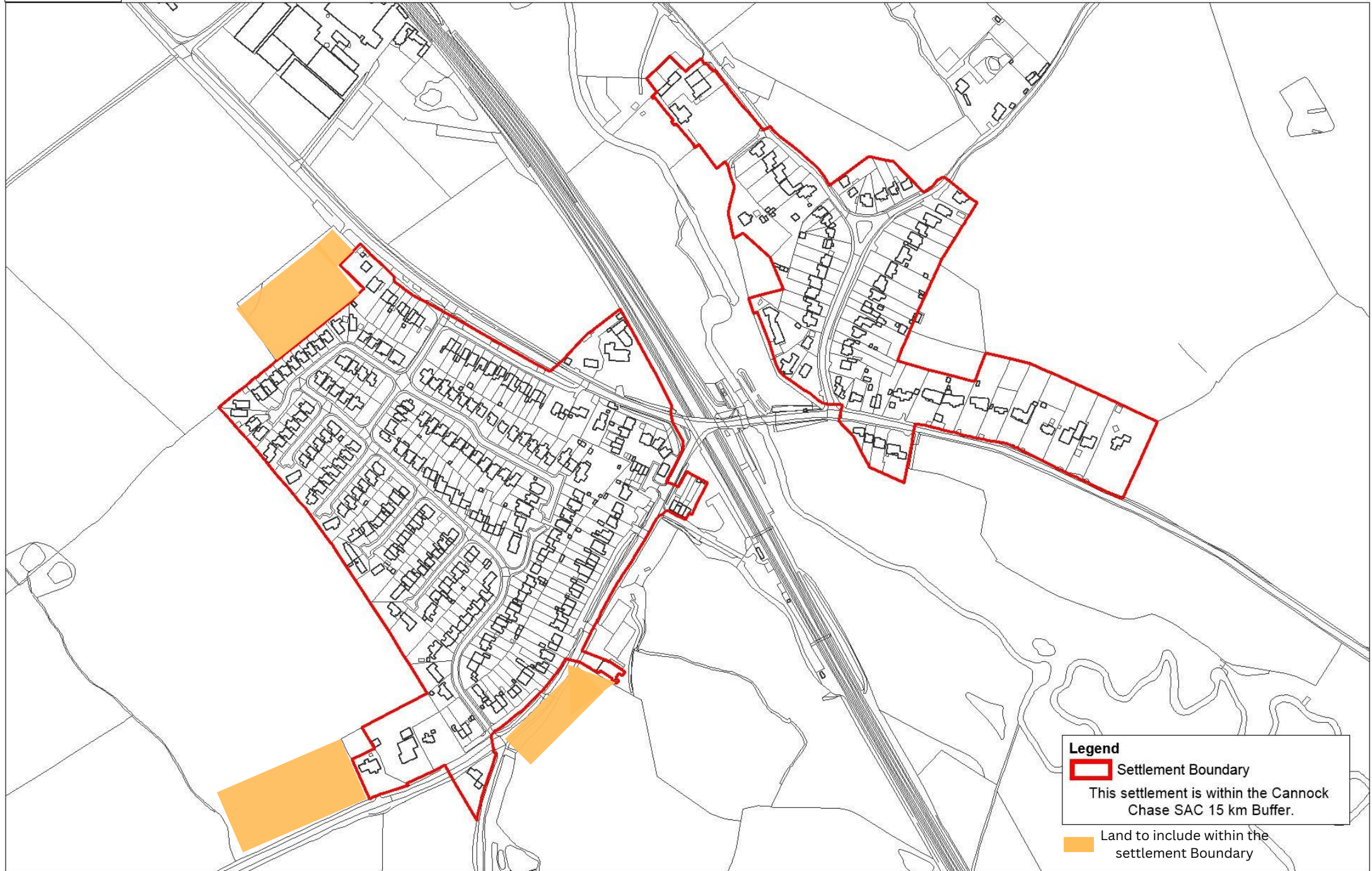
Land to include within the Settlement Boundary

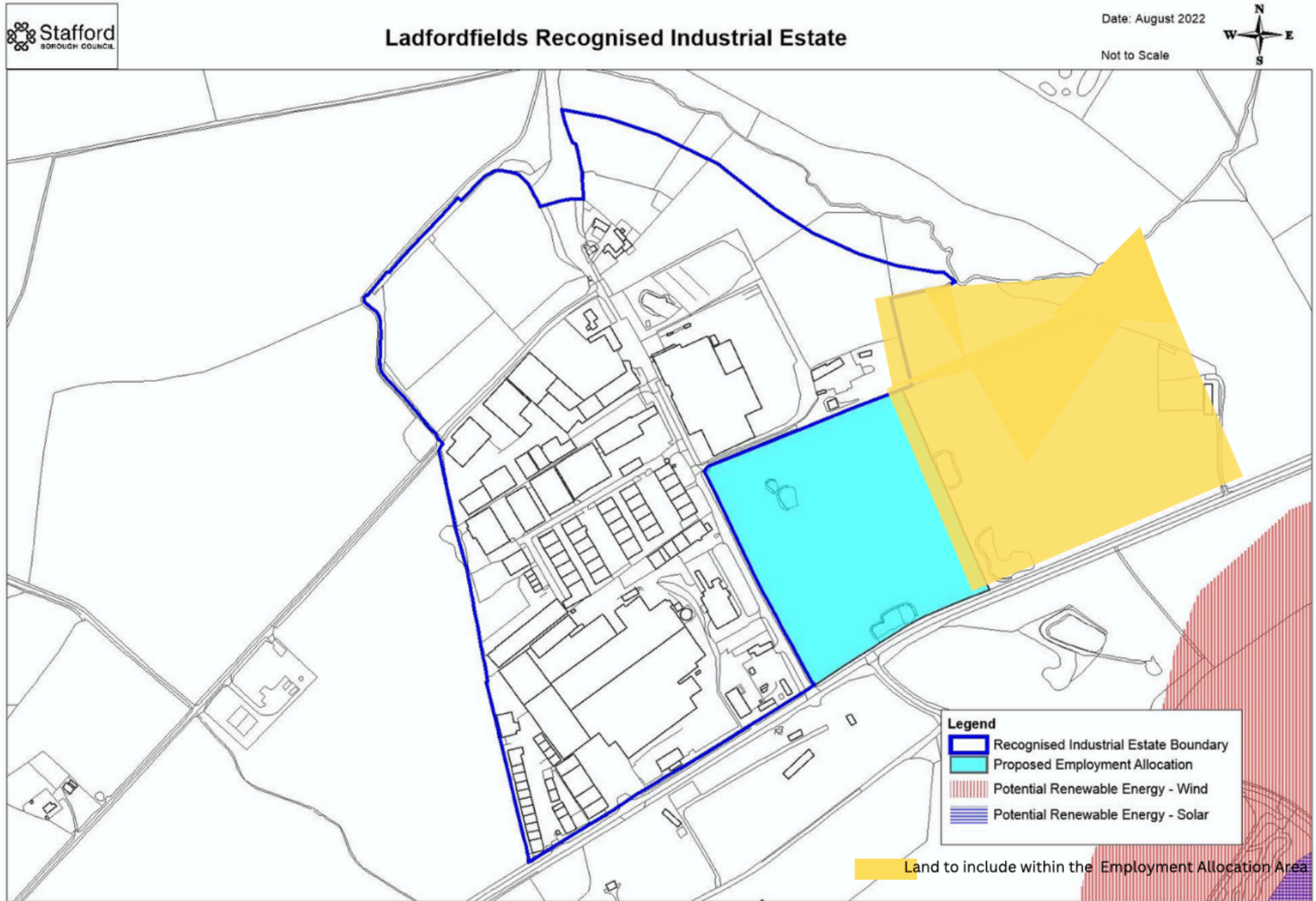
Legend

-  Settlement Boundary

This settlement is within the Cannock Chase SAC 15 km Buffer.

Great Bridgeford





From: Jessica Graham [REDACTED]
Sent: 12 December 2022 11:44
To: Strategic Planning Consultations
Cc: [REDACTED]
Subject: HarperCrewe (Stafford Station Gateway and Brunswick Terrace) - Response to Preferred Options Consultation
Attachments: HarperCrewe - Preferred Options Consultation Response Form.pdf; HarperCrewe - Brunswick Flood Risk Note.pdf; HarperCrewe - Stafford Rugby Club Flood Risk Note.pdf

Dear Sir / Madam,

On behalf of HarperCrewe, please find attached their response to the Local Plan Preferred Options consultation. HarperCrewe is working with Swynnerton Estates to promote their land currently proposed to be allocated within Stafford Station Gateway (SHELAA reference STAFMB23) as well as an additional site off Brunswick Terrace, Stafford (SHELAA reference STAFMB10).

The following documents are attached to this email:

- Consultation response;
- Flood Risk Technical Note – Former Stafford Rugby Club; and,
- Flood Risk Technical Note – Brunswick Terrace.

Please can you confirm receipt of these representations.

Kind regards,

Jess

Jessica Graham MRTPI
Associate
Planning



Website : www.savills.co.uk



 Before printing, think about the environment

Contact Details

Full name (required): Jessica Graham

Email (required): [REDACTED]

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

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

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

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?

[REDACTED]

Contents

The Local Plan Preferred Options includes the topics listed below.

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

- **Vision and Objectives** - page 5
- **Development Strategy and Climate Change Response** - page 6
- **Meecebrook Garden Community** - page 9
- **Site Allocation Policies** - page 10
- **Economy Policies** - page 14
- **Housing Policies** - page 16
- **Design and Infrastructure Policies** - page 18
- **Environment Policies** - page 19
- **Connections** - page 20
- **Evidence Base** - page 21
- **General Comments** - page 22

All of the local plan documents and the Local Plan 2020-2040: Preferred Options document are available here: <https://www.staffordbc.gov.uk/local-plan>

Vision and Objectives

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

"A prosperous and attractive borough with strong communities."

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

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

Local Plan Preferred Options document reference: Page 12

- Contribute to Stafford Borough being net zero carbon by ensuring that development mitigates and adapts to climate change and is future proof.
- To develop a high value, high skill, innovative and sustainable economy.
- To strengthen our town centres through a quality environment and flexible mix of uses.
- To deliver sustainable economic and housing growth to provide income and jobs.
- To deliver infrastructure led growth supported by accessible services and facilities.
- To provide an attractive place to live and work and support strong communities that promote health and wellbeing.
- To increase and enhance green and blue infrastructure in the borough and to enable greater access to it while improving the natural environment and biodiversity.
- To secure high-quality design.

Development Strategy and Climate Change Response

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

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

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

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

Local Plan Preferred Options document reference: Pages 19 to 40

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

No

Policy 1 Comments:

This response is made on behalf of HarperCrewe who is promoting land owned by Swynnerton Estates within Stafford. The sites have been assessed by Stafford Borough Council ('SBC') within the Strategic Housing and Employment Land Availability Assessment ('SHELAA') 2022 as sites referenced STAFMB23 (Former Stafford Rugby Club) and STAFMB10 (Land off Brunswick Terrace). Both sites are within the urban area of Stafford and in close proximity to the shops, services and facilities provided within the Borough's most sustainable settlement. Despite their sustainable location, the SHELAA identifies them as 'unsuitable' for development because they are within flood zone 2. BWB consulting has produced technical notes for STAFMB23 and STAFMB10 to demonstrate that, subject to mitigation and good design, flood risk does not render the sites undevelopable. The Environment agency Flood Maps are high level and strategic in nature and further modelling work is being undertaken for the sites which will inform any proposed mitigation measures

The Former Stafford Rugby Club site (STAFMB23) is proposed to be allocated as part of the Stafford Station Gateway site. HarperCrewe support the proposed allocation and provide more detailed comments on the proposals in response to draft Policy 11.

As part of the Brunswick Terrace site promotion (STAFMB10), there is wider potential development opportunity with land to the south east of the site (STAFMB11). The additional land is not within Swynnerton Estates ownership but we understand that the landowner is supportive of potential development on their land.

Policy 1 – Development Strategy

The majority of housing growth (59%) is being directed to Stafford when existing commitments are taken into consideration which HarperCrewe support. However, the majority of the new proposed housing growth is not being directed to Stafford (1,181 dwellings) but to the proposed new settlement at Meecebrook (3,000 dwellings). We have concerns over the delivery of Meecebrook and consider that SBC may have to identify additional sites in order to meet any under delivery from Meecebrook.

Paragraph 31 of the National Planning Policy Framework ('NPPF') requires policies to be underpinned by relevant evidence which is adequate, proportionate and justifies the policies proposed. At this stage, we do not currently consider that the Council has provided sufficient evidence to demonstrate that the Site is suitable for development and can deliver 3,000 dwellings within the plan period.

Paragraph 73 of the NPPF makes it clear that new settlements need to be "*well located*" and "*supported by the necessary infrastructure and facilities (including a genuine choice of transport modes)*". Paragraph 73 also states that planned infrastructure can be a consideration in identifying a suitable location for a new settlement. The Meecebrook Vision Document and supporting evidence, sets out that SBC are intending to deliver a new rail station on the West Coast Mainline to serve this development.

The proposed Meecebrook allocation is supported by Rail Feasibility Reports (March, July and September 2022). The March 2022 study notes that delivering a new railway station is far from "*easy or straightforward*" and "*the process is long and can be difficult*" (page 12). The other rail reports primarily look at suitable locations for the new station but there is no confirmation on potential costs and when the station could reasonably be delivered. Additionally, the Infrastructure Delivery Plan (2022) does not list any engagement which has taken place between SBC, the Meecebrook landowners / developers and Network Rail on the proposed new station. As the key infrastructure provider, it is imperative that Network Rail support the proposals and input into their delivery.

In addition to the above, as with Stafford Station Gateway which we discuss further in our response to Policy 11, there is very limited information in the Infrastructure Delivery Plan and Viability Assessment to confirm the level of infrastructure required and costs associated with it. More information is required in order to demonstrate that the infrastructure is deliverable and will not render the proposed development unviable.

The NPPF (paragraph 73d) also requires that Councils “*make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation*”. The ‘Lead-in Times and Built Rates Assumptions’ (‘LTBRA’) Topic Paper sets out SBC’s proposed approach to development on the projected delivery timescales for the allocations. SBC is currently projecting for 300 dwellings to start being delivered at Meecebrook from 2030/31 and then consistently throughout the rest of the plan period. It is unclear why the proposed build rates for the site differ from those set out in Table 10 (taken from Lichfields Start to Finish Report) and Table 12 (SBC assumptions) in the LTBRA Topic Paper which both assume that sites of over 2,000 dwellings will deliver 160 dwellings per annum.

Table 5 of the LTBRA Topic Paper shows Lichfields’ timeframe assumptions from validation to completion of the first dwellings on a site. For 2,000+ dwellings, the average is 8.4 years. Table 7 shows SBC’s assumptions on timescales and this only shows sites of 500+ which SBC consider will only take 4.5 years from validation and completion of the first dwellings. We consider that SBC should review these assumptions and align the proposed lead-in times for Meecebrook with Table 5.

In light of the above, it is considered that SBC may need to identify additional sites to meet any shortfalls from the proposed Meecebrook allocation. If additional sites were to be identified then new allocations should be directed to the most sustainable settlements in the Borough. SHELAA Site reference STAFMB10 (and potential wider opportunity with STAFMB11) on land off Brunswick Terrace is located within the Tier 1 settlement of Stafford. The site is also within close proximity to the proposed Stafford Station Gateway site and its development would align with the national and local objectives of redeveloping sites within the urban area.

In addition to the potential shortfalls arising from the Meecebrook allocation, we also consider that SBC’s proposed contribution towards the adjacent Housing Market Areas (‘HMA’) should be greater than the 2,000 dwellings currently proposed. There is an identified shortfall of circa 78,000 dwellings from Greater Birmingham and circa 28,000 dwellings arising from the Black Country. These are significant figures and will require HMA authorities to provide reasonable contributions. Paragraph 1.30 of the Housing and Employment Land Requirement (‘HELN’) Topic Paper sets out that Stafford has strong migration relationships with the Greater Birmingham and Black Country HMA (‘GBBCHMA’) and North Staffordshire HMA. Therefore, the Borough should be contributing a proportionate amount towards the shortfall, 2,000 dwellings is not considered to be proportionate.

The NPPF (paragraph 31) and Planning Practice Guidance ('PPG') require policies to be justified and the evidence base "*needs to inform what is in the plan and shape its development*" (PPG Reference ID: 61-038-20190315). However, there is no evidence provided which justifies how the 2,000 dwellings contribution has been calculated or which shortfall SBC is intending to contribute towards.

If an additional contribution is made towards meeting the HMA shortfall then, as set out above, site reference STAFMB10 (and potential wider opportunity with STAFMB11) could be a suitable allocation given their location within the most sustainable settlement in the Borough and their proximity to the Stafford Station Gateway site and regeneration area.

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:

Policy 2 states that "*new development will be of a scale commensurate with the position of the settlement in the hierarchy*". Policy 2 identifies Stafford as a 'Tier 1' and the most sustainable settlement within the Borough. We support this policy as Stafford provides the greatest range of shops, services and facilities within the Borough so this settlement should be the focus of the most growth.

Stafford is expected to deliver 7,385 dwellings between 2020-2040 (page 27 of the Preferred Options plan). However, the majority of this growth is being delivered by existing commitments (north and west Stafford Strategic Development Locations) and only 1,181 dwellings will be delivered on new proposed allocations (900 dwellings at Stafford Station Gateway). We consider that additional allocations should be proposed within Stafford.

Policy 4. Climate change development requirements

No

Policy 4 Comments:

The PPG requires the impact of climate change to be taken into account in a “*realistic way*” (Reference ID: 6-005-20140306). Policy 4B sets out a series of climate change requires for residential developments. It is considered that ‘where practicable and viable’ should be added to the policy wording to ensure more flexibility and that the policy does not impact on a site’s deliverability or viability.

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 11. Stafford Station Gateway

Yes

Policy 11 Comments:

HarperCrewe is working with Swynnerton Estates who own land within the proposed Stafford Station Gateway site (SHELAA reference STAFMB23 – former Stafford Rugby Club). The Stafford Station Gateway site is located within the Stafford's urban area, is brownfield, in close proximity to the range of shops, services and facilities provided in Stafford and immediately adjacent to the train station. We fully support the proposed allocation and overall vision that SBC have for the redevelopment of this highly sustainable gateway site.

Policy 11 states that “*any application for development on a part or the whole of the site should be consistent with the Stafford Station Gateway Strategic Regeneration Framework for the whole site allocation*”. HarperCrewe made separate comments to SBC on the Framework in October 2022. Further work is required in order to ensure the Framework proposals are deliverable. Subject to the requested amendments being made to the Framework, then HarperCrewe has no objections to this specific requirement within Policy 11.

Policy 11 goes on to require that any individual applications on the gateway site will need to show the relationship of the application area to the wider allocation and be designed to not prejudice the delivery or design of the wider site. Given the allocation site is owned by various landowners, it is expected that the Gateway site will be delivered through multiple applications. It is important that SBC’s approach to the individual applications does not restrict their delivery and not all of the applications should need to demonstrate compliance with all 10 of the bullet points in Policy 11 where they are not relevant e.g. bullet 8 and 9 if only residential use is proposed within that phase. We consider that the last sentence of Policy 11 Part A should be reworded so that it states “*Where relevant to the individual application or phase, development should seek to deliver the following key requirements unless agreed with Stafford Borough Council...*”.

In relating to Part A bullet 7 of the policy, it requires the production of a site-allocation-wide flood risk assessment and sustainable drainage strategy. HarperCrewe has no objection with inputting into this work. However, to ensure no delay to the delivery programme, this work needs to be undertaken within the next 4-6 months and the requirement for it to be ‘site-wide’ needs to have some flexibility in case some of the landowners do not want to be involved. Their lack of involvement should not delay the rest of the site from being delivered.

HarperCrewe’s ethos is to work with landowners, investors and communities to create spaces and environments that are well designed and work for people for the long term. HarperCrewe’s involvement in the site, on top of the technical work undertaken on the site for Swynnerton Estates over the years, means that it is likely that the former rugby club site could be delivered in the first phase of the Gateway redevelopment and dwellings are likely to be delivered on the site before the 2028/29 projected completions within Table 13 of the LBRA Topic Paper. We consider that early delivery of parts of the gateway allocation should be supported, particularly in light of our comments on the proposed Meecebrook allocation and concerns on when that site will start delivering dwellings.

Table 12 in the LTBRA Topic Paper sets out SBCs proposed annual build rate assumptions and states that on sites of 500 - 999 dwellings, the proposed trajectory is 70 dwellings per annum. This aligns with Table 10 of the LTBRA Topic Paper, which sets out the findings of the Lichfields Report. It is therefore considered that the Build Rate assumptions for Stafford Station Gateway align with national delivery rates. However, we would note that it is not normal practice to assume that a site will deliver the maximum number of dwellings in its first year or two. Delivery normally 'ramps' up after the first couple of years.

Section 7 of the Infrastructure Delivery Plan (IDP) 2022 sets out a list of potential infrastructure items for the site. Key infrastructure listed includes: contributions to school expansion; new and improved bicycle and pedestrian routes linking the site to the Stafford town centre; a new toucan crossing across the Stafford Western access road; new western train station entrance and public space; pedestrian and cycle improvements to Castle Street and Newport Road; and, green infrastructure improvements. There is currently no details on costs of these infrastructure requirement. SBC should continue to engage with the gateway's landowner / developer group and ensure that the key infrastructure and contributions are agreed in the short term so that it does not delay the delivery of the scheme.

The SHELAA Assessment of the Former Rugby Club site (STAFMB23) notes the following constraints: flood risk, green infrastructure, public right of way and contamination land / stability issues. In regards to green infrastructure, the site is currently designated as green infrastrctuure in the adopted Local Plan. However, the Stafford Rugby Club has already relocated from the site to larger and improved facilities on Blackberry Lane. Additionally, it is expected that as part of the wider allocation new green infrastructure links will be provided which the public rights of way will be incorporated in to. As part of any future application on site, detailed ground investigations will be undertaken on the site.

The Sustainability Appraisal ('SA') 2022 acknowledges that flood risk is a constraint across the proposed Gateway allocation (paragraph 5.2.59). However, paragraph 9.3.7 of the SA notes that "*as a regeneration site there is a clear argument in support of growth*" despite the flood risk constraint. As part of any future applications on the gateway allocation, we expect them to be supported by appropriate flood risk assessments and drainage strategies.

HarperCrewe looks forward to continuing to work with SBC to deliver this sustainable site.

Policy 12. Other housing and employment land allocations.

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

No

Policy 12 Comments:

Policy 12 proposes four allocations within Stafford, however, paragraph 12.1 states that sites HOP03 and HOP08 are brownfield sites within the Stafford urban area which are not currently achievable. We acknowledge and support the decision taken by SBC to not count these two sites as part of the proposed housing trajectory, however it is unclear what the benefit of including these sites (above other potentially deliverable brownfield sites in Stafford) within Policy 12 is. National and local planning policies support the redevelopment of brownfield land, particularly within the settlement boundary of the most sustainable settlement in the Borough. Therefore, if sites HOP03 and HOP08 were to be achievable later in the plan period, subject to meeting the requirements of other development plan policies, SBC should be supportive of their redevelopment without them being specifically allocated within the plan. We therefore consider that reference to sites HOP03 and HOP08 should be removed from the plan.

HarperCrewe is promoting vacant land within the Stafford urban area which is considered to be suitable, available and achievable for development (SHELAA reference STAFMB10 and potential wider opportunity with STAFMB11). The SHELAA 2022 found that the site was unsuitable for development because it was located in the Flood Zone. HarperCrewe has submitted a Flood Risk Technical Note with these representations which demonstrate that the sites' location within the Flood Zone 2 does not render the sites undevelopable. As part of any future application on the sites, suitable mitigation and a drainage strategy will be proposed and agreed with the LLFA.

In light of the above, we consider that as a suitable, available and achievable site within the most sustainable settlement in the borough, it should be allocated for residential use within the plan.

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?

No

Comments:

Within the Rowley Ward, Policy 23 requires greenfield sites to provide 20% affordable housing and brownfield sites to provide 5% affordable housing. We consider that 'where viable' should be added to Policy 23 part A.

Stafford Station Gateway is located within the Rowley Ward. However, the Stafford Station Gateway Strategic Regeneration Framework (the 'Framework') (September 2022) states that the site will "target a minimum of 30%" affordable housing (page 53). We submitted separate comments on this requirement in the Framework in October 2022. A Viability Assessment (September 2022) has been produced to support the plan process. Stafford Station Gateway has been assessed as a strategic site within section 6 of the assessment. The Viability Assessment has concluded that the site is not viable with 0% affordable housing (paragraph 6.46) and would only deliver 25% affordable housing should there be an infrastructure reduction and removal of policy requirements (paragraph 6.47). This is not unusual for a brownfield site however it is considered that further consideration is needed to confirm likely infrastructure costs and how these may impact on the site delivering 5% affordable housing. HarperCrewe will continue to work with SBC in order to agree infrastructure requirements. We request that any reference to the gateway site achieving 30% affordable housing should be removed from the Framework.

In relation to the proposed tenure, the policy provides specific percentages for each affordable tenure within Policy 23 part F (65% social rented, 25% first homes and 10% shared ownership). We consider that Part F should be amended to state 'where possible' in order to provide sufficient flexibility and allow tenures to be agreed between SBC and the applicant on a site by site basis and determined on local need at the time of the application.

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

Comments:

Policy 24 – Homes for Life

Part A and B of Policy 24 require specific provision of M4(2) and M4(3) dwellings on major development sites (10% of all dwellings to meet M4(2) standards and 10% of affordable dwellings to meet M4(3) standards). The PPG (Reference ID: 56-008-20160519) states that when adopting accessibility standards “*Local Plan policies should also take into account site specific factors such as vulnerability to flooding, site topography, and other circumstances which may make a specific site less suitable for M4(2) and M4(3) compliant dwellings. particularly where step free access cannot be achieved or is not viable. Where step-free access is not viable, neither of the Optional Requirements in Part M should be applied” [Savills emphasis]. Policy 24 Parts A - C make no provision for the PPG exceptions and therefore should be amended to refer to site specific factors which may render compliance with the Part M standards unachievable or viable.*

Part D requires all new homes to be built to meet the Nationally Described Space standards. Where a need for internal space standards is identified, the PPG (Reference ID: 56-020-20150327) requires Councils to take account of the need for the standards, the potential impact on viability and the timing of introducing the standards. We did not identify any evidence which set out justification for the space standards and how the Council had considered need, viability and timing. This needs to be provided in order to justify the introduction of space standards in the plan.

Part E proposes very specific minimum private amenity space areas depending on the proposed number of bedrooms. Although private amenity space is not addressed within the internal space standards guidance, there is a national requirement to make the most effective use of land (NPPF Chapter 11). We consider that the Council should have to justify the requirement for these specific standards and the policy’s potential impact on proposed delivery of dwellings, particularly on sites within the urban area (e.g. Stafford Station Gateway) when the scale of development delivered is likely to be of a higher density than schemes delivered elsewhere in the Borough.

Policy 31 – Housing Mix and Density

We support the flexibility proposed within Policy 31 and paragraph 31.2 in relation to housing mix and applying densities to development sites. The appropriate housing mix and density for a site should be considered on a site by site basis and reflective of site constraints, context of the surrounding area and the market condition / demand at the time of the application.

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

Comments:

Policy 42 – Flood Risk

Land at Brunswick Terrace (SHELAA reference STAFMB10 and potential wider opportunity with STAFMB11) is located within Flood Zone 2. HarperCrewe acknowledges that residential use is identified as 'more vulnerable' but is acceptable development within Flood Zone 2 (PPG reference ID: 7-079-20220825). We appreciate that Table 2 of the PPG (Reference ID: 7-079-20220825) does not show the application of the sequential test which should be applied first to guide development to the lowest flood risk areas. However, as part of the plan making process, it is considered that this site could pass the sequential test given it is an opportunity to redevelop a vacant site within the Stafford Urban Area and BWB Consulting has identified that the flood risk constraints on the site can be overcome subject to mitigation (submitted Flood Risk Technical Note).

Policy 47 – Biodiversity

Appendix 4 of the Open Space and green and blue infrastructure Topic Paper includes Map 1 which shows the Strategic Green Infrastructure Network within Stafford. Map 1 shows the proposed Stafford Station Gateway site as being "*part of pending planning permission*". It is unclear what is meant by this statement as an application has not yet been submitted for the whole of the proposed allocation.

The Policy requires sites to achieve a biodiversity net gain of 10% which should be secured in perpetuity (at least 30 years). Any proposed uplift requested by the Council needs to accord with national policy unless evidence is provided to justify a different figure. We are still waiting for the secondary legislation to be passed which should set out detailed requirements for net gain. SBC should monitor progress of the national legislation and update this policy where required. ...

...Given the national requirement to make efficient use of land (Chapter 11 of the NPPF), we consider that if suitable land is identified for off-site biodiversity improvements that should be supported to enable allocations, particularly those within the urban area such as Stafford Station Gateway, to be delivered as efficiently as possible.

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

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

Completed forms can be submitted by email to:

strategicplanningconsultations@staffordbc.gov.uk

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

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

FORMER RUGBY CLUB SITE, LAND AT CASTLEFIELDS, STAFFORD (STAFMB23)

Flood Risk

Fluvial Flood Risk

- 1.1 While the site is shown to be at potential flood risk from fluvial sources within the Environment Agency (EA) Flood Map for Planning (see **Figure 1** below), with Flood Zones 2 & 3 shown to extend into the proposed site boundary, further assessment is ongoing that supersedes this mapping. It is important to note that this mapping is at strategic scale and does not represent a detailed assessment of flood risk at the site.

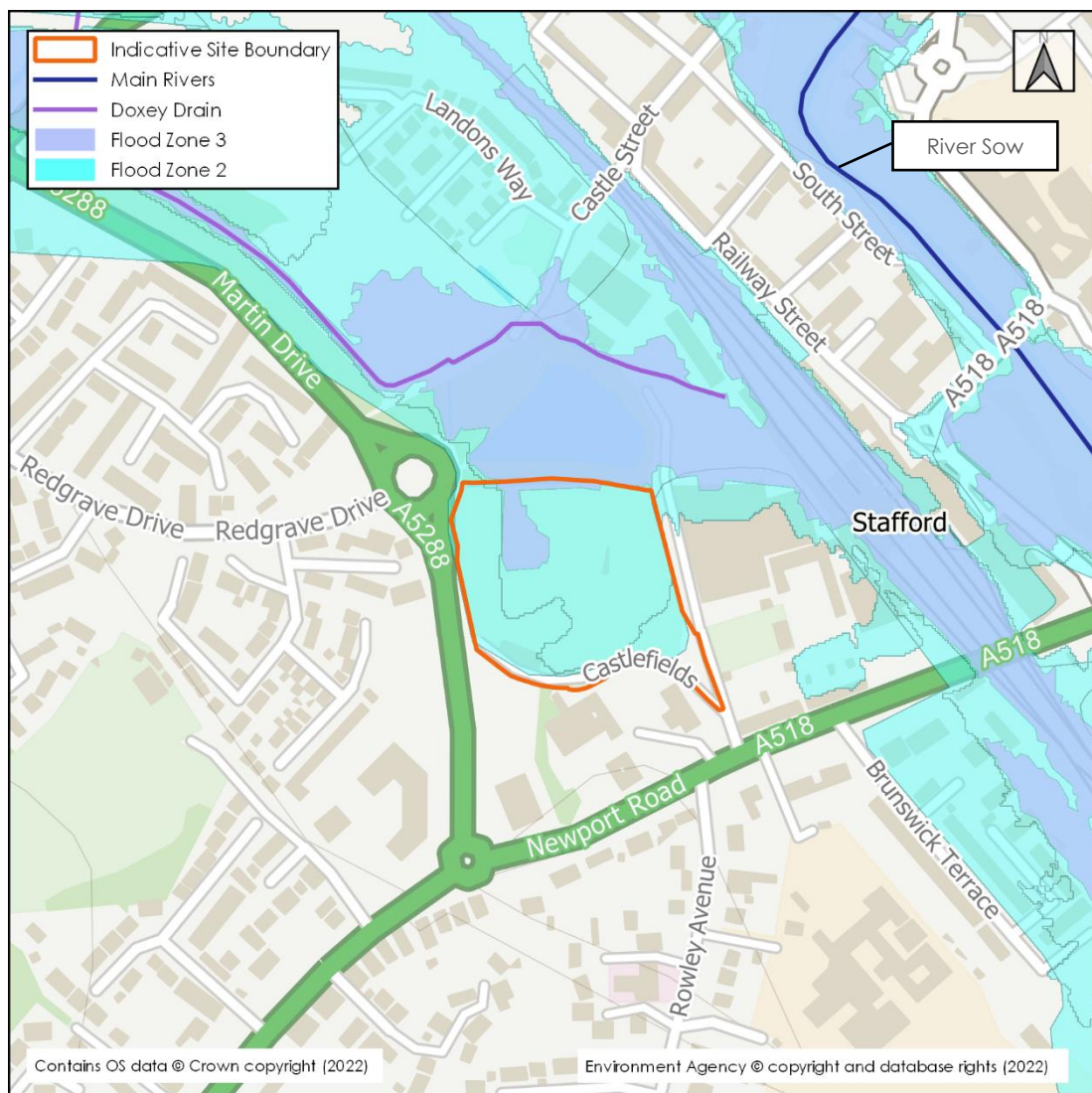


Figure 1: EA Flood Map for Planning

- 1.2 BWB has been liaising with both the Internal Drainage Board (IDB) and EA over the past 2 years. BWB has obtained copies of both the IDB's model of the Doxey Drain and the EA's model of the River Sow (locations shown in **Figure 1**).

- 1.3 Additional topographical survey data for the site and immediate surrounding ground, including details of the localised culverted watercourse, have been added to the IDB model to better represent the site within the hydraulic model. This modelling has shown the site to lie outside of the modelled Doxey Drain floodplain extents for all scenarios up to, and including, the 1 in 1000-year.
- 1.4 The EA model has also been run with the updated site-specific topographical survey information, which has also further confirmed that the site predominately lies outside of the 100-year floodplain including a 30% allowance for climate change from the River Sow.
- 1.5 A further hydraulic modelling exercise is expected to be undertaken to understand the combined risk from the EA River Sow and the Doxey Drain. The outcomes of this will inform the flood risk mitigation measures for the site.
- 1.6 It is understood that a site wide FRA is expected to be produced for the wider Stafford Station Gateway redevelopment.

Surface Water Flood Risk

- 1.7 The site is shown to be at potential high flood risk from surface water flooding (on the EA's Risk of Flooding from Surface Water mapping), see **Figure 2** below. However, it should be noted that this mapping is highly indicative and does not include for any detail of existing surface water or drainage infrastructure on the ground.

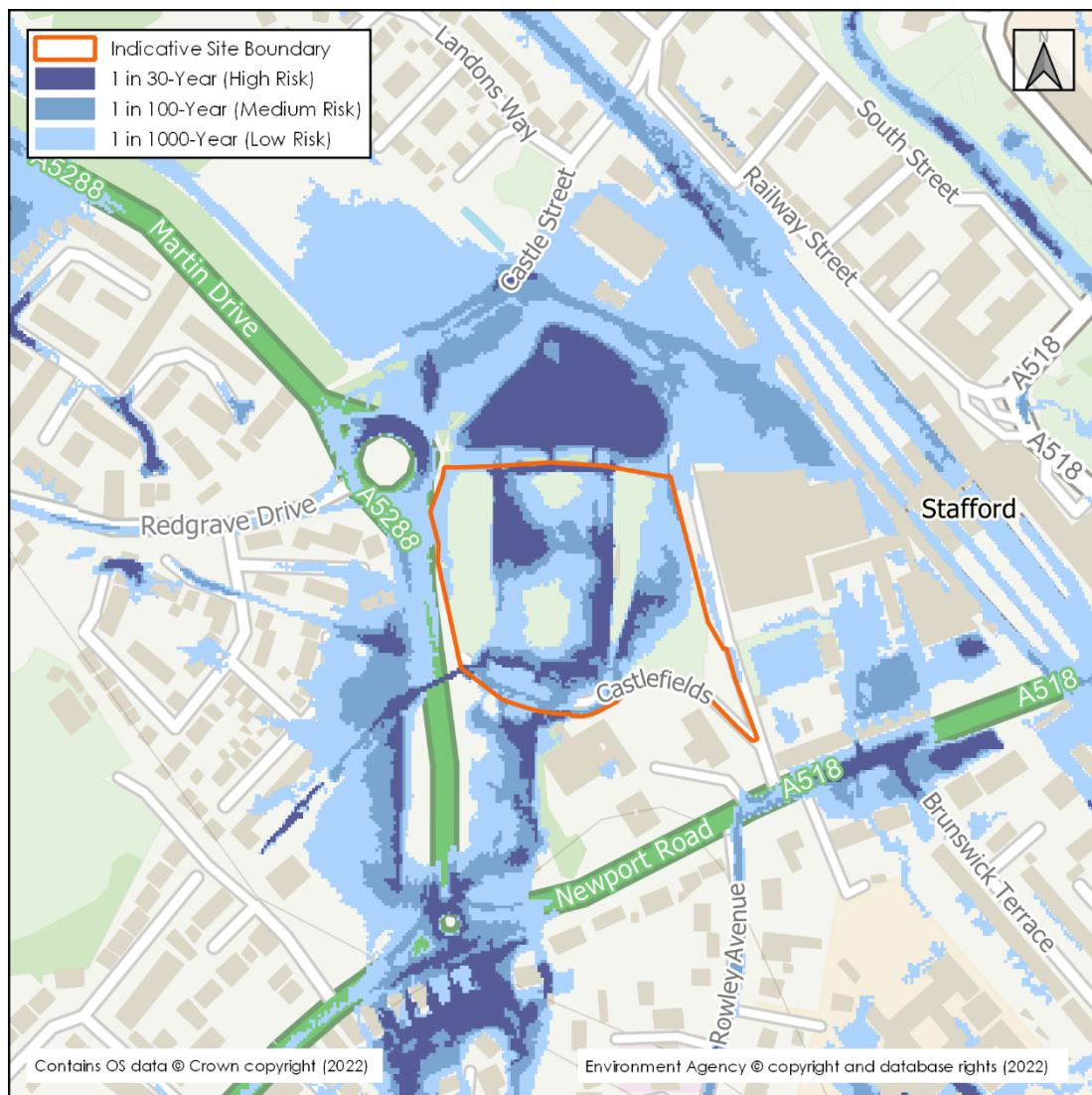


Figure 2: EA Risk of Flooding from Surface Water Mapping

- 1.8 In this instance, the existing rugby club pitches form low lying ground on the site and there is evidence of a historical watercourse route through the site. However, BWB has undertaken additional surveys in the area, including CCTV surveys of local drainage systems. It is anticipated that the historic watercourse system has been diverted at the time of the construction of Kingsway (A5288) and a new large diameter culvert system is now known to run within this road, outfalling to the basin to the north of the site boundary.
- 1.9 As such, the mapping is not expected to be representative of the present flood risk at the site. The culverted watercourse and contributing catchment have been included in the BWB updated Doxey Drain model and modelling to date shows the site to be at low risk from this source.

Other Sources of Flood Risk

- 1.10 A review of other sources of flood risk (canals, groundwater, reservoir and sewers) has been undertaken and none are considered to preclude development. The site is shown

to be at low risk from groundwater or reservoir flooding. Residual risk of flood flow routing from exceedance of local sewer or other drainage systems will need to be accounted for within site design mitigation measures, but are likely to be consistent with those associated with fluvial flood risk e.g. raised FFLs and provision of safe exceedance flood flow routes through the landscaped areas of the site. Appropriate mitigation measures for any flood risks will be considered within the site layout and outlined within a site-specific Flood Risk Assessment (FRA) to support a future planning application, examples include raising of finished floor levels and general profiling.

Preliminary Drainage Review

- 1.11 The site is partially greenfield and discharges to the existing land drainage, which in turn drains in to the Doxey Drain system. Surface water runoff from the development will be limited to greenfield rates for all events up to and including the 100-year design event, with an additional allowance for climate change. This will represent a net reduction in peak runoff rate in extreme storm conditions.
- 1.12 Sustainable Drainage Systems (SuDS) will be included within the development to provide appropriate treatment of runoff from the site before discharge to the Doxey Drain system. A range of features will be considered on site, which could include rain gardens/bioretention areas, porous paving, swales and basins.
- 1.13 Foul drainage from the site will be discharged to the local Severn Trent Water sewerage system. Early and ongoing engagement will be held with Severn Trent Water to confirm the local network capacity and to agree on an appropriate point of connection.

Conclusion

- 1.14 Subject to further investigations, including further hydraulic modelling, and implementation of appropriate mitigation measures flood risk is not expected to preclude development of the site.
- 1.15 A site-specific FRA will be prepared to support a future planning application. It will assess flood risk from all sources and set out appropriate mitigation measures in accordance with local and national guidance. A site-specific surface and foul water drainage strategy will also be implemented in accordance with local and national guidance.

BRUNSWICK TERRACE, STAFFORD (STAFMB10 & STAFMB11)

Flood Risk

Fluvial Flood Risk

- 1.1 According to the Environment Agency (EA) Flood Map for Planning (**Figure 1**), the site is located entirely in Flood Zone 2, which is land considered to be at medium risk of fluvial flooding. The Flood Zones appear to be partially associated with historical flood outlines. The nearest EA Main Rivers are the River Sow located approximately 340m northeast of the STAFMB10 site and the Risings Brook located approximately 560m downstream of the STAFMB11 site.

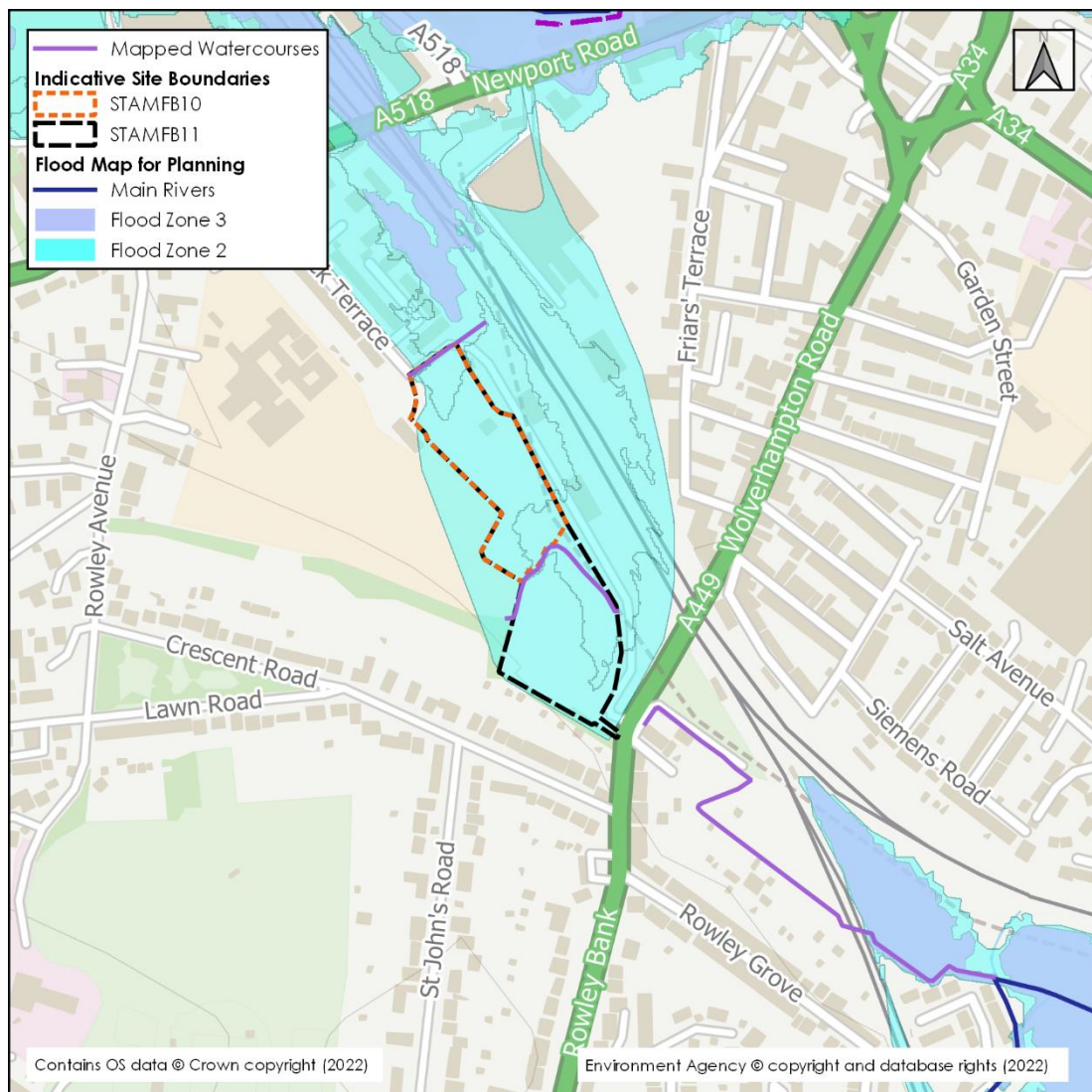


Figure 1: EA Flood Map for Planning

- 1.2 There are a number of Unnamed Ordinary Watercourses (UOW) shown to be located within the vicinity of the site on OS mapping, including on the northern boundary of the STAFMB10 and STAFMB11 sites and within the central and eastern portions of the STAFMB11 site. The locations are indicated on **Figure 1**. The UOWs are excluded from the

Flood Map for Planning due to their small catchment size. There is a high point in the centre of the STAMFB11 site according to the EA Light Detection and Ranging (LiDAR) data which suggests the watercourses in the north and central areas may be located within separate catchments.

- 1.3 BWB have also obtained and reviewed flood level information from the EA's models of the Risings Brook and River Sow. Comparing the nearest flood levels from these models with site levels from LiDAR suggests that the extent of flood risk on the site is less than that shown by the EA's Flood Map for Planning. This mapping is strategic scale only and is intended to be updated by a more detailed site-specific hydraulic modelling for the site in due course.
- 1.4 The indication is that, while flood risk is a consideration for the site, there should be sufficient space on the site at a low risk of flooding to deliver housing. It is noted that the STAMFB11 site has previously received full planning and therefore the principle of residential development was agreed at the site by the Council. As part of any future application on the site, consultation will be undertaken with the Local Planning Authority and Lead Local Flood Authority. Safe access and egress will be a consideration for the site-specific Flood Risk Assessment (FRA) but is unlikely to be prohibitive to the development of the site given that main access points are shown to lie at low risk only by this indicative mapping. It should also be noted that this mapping does not fully account for ditches and other drainage infrastructure on site.
- 1.5 Further investigation of the local watercourse connectivity and hydraulic modelling are required to understand the flood risk posed to the site from the local watercourses and inform mitigation measures.

Surface Water Flood Risk

- 1.6 Both sites are predominately at very low to low risk of flooding from surface water sources according to the EA Risk of Flooding from Surface Water mapping (**Figure 2**). Around the north of the STAFMB10 and STAFMB11 sites there is a low-risk flow route entering the site on the northern boundary and continuing across the boundary. This broadly aligns with the UOW. There is also an area of medium to high risk in this location which aligns with a low point according to the EA LiDAR. Around the southeast of the STAFMB11 site there is an isolated area of low to high risk which partially aligns with the UOW. Mitigation measures for these risks will be considered within the site layout and outlined within a site-specific FRA, examples include sequential arrangement, raising of levels and ground level profiling.

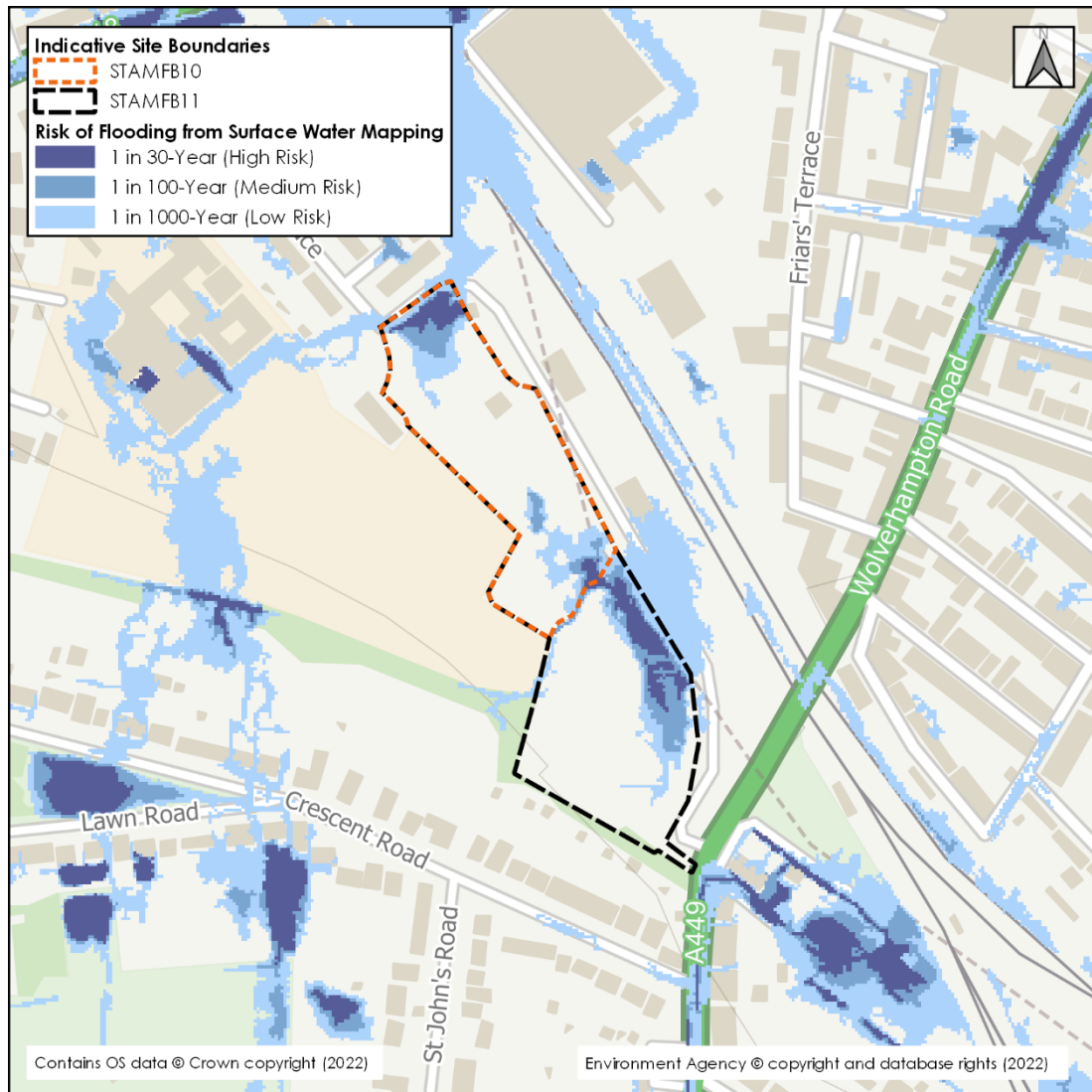


Figure 2: EA Risk of Flooding from Surface Water Mapping

Other Sources of Flood Risk

- 1.7 The proposed development sites have also been reviewed against a further range of potential flood risk sources including canals, groundwater and reservoirs. None of these sources are considered to represent a potential barrier to development. Appropriate mitigation measures for any flood risks will be outlined within a site-specific FRA to support a future planning application.

Preliminary Drainage

- 1.8 An appropriate surface water management strategy which compiles with the latest local and national guidance should be implemented at the site to attenuate the increase in surface water runoff caused by the development. Infiltration should be considered as a first option for the disposal of surface water. In the event that infiltration is not viable, the rate at which runoff is discharged from each site should be restricted to an appropriate rate. In order to achieve the required surface water runoff restriction, attenuation should be provided within the site to store surface water prior to discharge.

- 1.9 Through the application of Sustainable Drainage Systems (SuDS), the additional surface water will be stored within the site and subjected to multiple stages of treatment to guarantee that the water quality in the wider drainage network is protected. Wherever possible, SuDS features should be above ground to enhance the aesthetic amenity of the development and provide valuable habitats for the local wildlife. The attenuation provided should be appropriately sized to include an allowance for climate change.
- 1.10 Foul drainage from the site is expected be discharged to the local Severn Trent Water sewerage system. Early engagement with Severn Trent Water will be undertaken to confirm the capacity of the local network and to agree an appropriate point of connection; however, Severn Trent Water has an obligation to provide the necessary capacity or necessary improvements.

Conclusion

- 1.11 Subject to further investigations, including watercourse connectivity and hydraulic modelling, and implementation of appropriate mitigation measures flood risk is not expected to preclude development of the site.
- 1.12 A site-specific FRA will be prepared to support a future planning application. It will assess flood risk from all sources and set out appropriate mitigation measures in accordance with local and national guidance. A site-specific surface and foul water drainage strategy will also be implemented in accordance with local and national guidance.

From: Michael Burrow
Sent: 12 December 2022 07:40
To: Strategic Planning Consultations
Subject: Preferred Options Representations
Attachments: Preferred Options December 2022 (Land at Moreton).pdf; Preferred Options Consultation Response Formv2.0.pdf

Dear Sir / Madam

PREFERRED OPTIONS REPRESENTATIONS

Please find attached representations submitted on behalf of our client to the Preferred Options stage consultation for the emerging Stafford Borough Local Plan 2020-2040.

We look forward to receiving confirmation of receipt of these representations in due course. Please let me know if you would like to discuss this submission further.

Kind regards

Michael

Michael Burrow MSc MRICS
Associate Director
Planning



Website : www.savills.co.uk



12 December 2022
Preferred Options December 2022 (Land at Moreton)



Strategic Planning and Placemaking
Stafford Borough Council
Civic Centre
Riverside
Stafford
ST16 3AQ

Strategicplanningconsultations@staffordbc.gov.uk

Dear Sir / Madam

STAFFORD BOROUGH LOCAL PLAN 2020-2040 PREFERRED OPTIONS CONSULTATION

Preferred Options Representations

Savills has been instructed by the owners of land adjacent to the village of Moreton (promoted site refs. GNO15 and GNO16) to make representations to the Preferred Options consultation stage of the emerging Stafford Borough Local Plan 2020-2040. Please find the completed form enclosed, which provides responses to proposed Policies 1, 2, 23, 24 and 31 only.

Update to Site GNO16

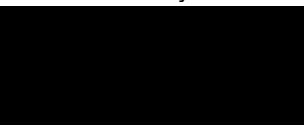
Further to the representations made to the Call for Sites process in January 2022, as reported within the Strategic Housing and Employment Land Availability Assessment (SHEELA) 2022 Update, my clients would also like to make an amendment to the boundary for site GNO16 (Land off Pooley Lane) to reflect additional land which they have advised they own in this location. I therefore set out to the right an extract from the SBC plan for site GNO16 showing this additional land shaded in pink.

I would appreciate it if you could update your records accordingly to include this additional land. The revised site size is 0.7ha. Based on the SHELAA assumptions this would give rise to a site capacity of approx. 15 dwellings (subject to whatever other additional facilities are provided on site).

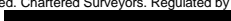


I trust that you find the representations in order and look forward to receiving confirmation of receipt of the representations in due course. If you have any queries or points of clarification please do not hesitate to be in contact.

Yours sincerely


Michael Burrow
Associate Director

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East..

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Registered office: 



Contact Details

Full name (required): Michael Burrow

Email (required): 

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

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

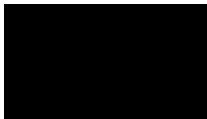
Organisation or Company Name (if applicable): Savills

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?



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:

Proposed Policy 1 states that provision will be made for 10,700 new homes in the period 2020 to 2040. The 'Broad spatial distribution of housing' table included within the Policy wording sets out how a higher housing target of 12,580 homes is proposed to be met in the new Plan period across the proposed settlement hierarchy from a combination of completions, commitments and new allocations / supply sources, including an allowance for windfall development.

National Planning Policy Framework (NPPF) paragraph 79 states that *"To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive"*.

It is however noted that in order to achieve the proposed new housing target Stafford Borough Council (SBC) is not proposing any new allocations or supply sources at either the smaller settlements or within the rural area. It is also noted that the existing supply figures include 7 completed dwellings and 13 'committed' dwellings at the smaller settlements (only 0.16% of the 12,580 home target). We have carried out a review, based on data within the SBC 'Land for New Homes: The Housing Monitor 2022' report, of where the sites which SBC has identified as being completed or committed at the settlements included within the 'smaller settlement' tier of the settlement hierarchy are located. This research has shown that none of these sites are actually located within the proposed settlement boundaries for these settlements.

On this basis the SBC Development Strategy would not be specifically reliant upon any homes being delivered at any of the settlements included within the 'smaller settlement' tier of the settlement hierarchy (Tier 5). This would run contrary to the approach set out within proposed Policy 2 which identifies that new development will be of a scale commensurate with the position of the settlement in the settlement hierarchy and supports the delivery of new development within settlement boundaries. We also question how this approach would promote sustainable development within rural areas, as required by NPPF paragraph 79.

The proposed distribution of development across the settlement hierarchy to meet the housing target for the new Plan period is therefore not considered to be sufficiently well balanced. This disparity therefore needs to be addressed to ensure that a sufficient quantum of development can take place within all tiers of the settlement hierarchy to meet whatever housing target is ultimately planned for through the new Plan, including if the housing target is increased beyond that included within the Preferred Options consultation document to reflect any of the higher housing growth options set out in Table 4 of the SBC Housing and Employment Land Numbers Topic Paper (Preferred Options Stage).

The NPPF (paragraphs 68-69) identifies that planning policies should identify a sufficient supply and mix of sites and that small and medium sites can make an important contribution to meeting the housing requirement of an area. The NPPF (paragraph 74) also identifies the need to maintain and update annually a five year supply of deliverable housing sites.

We therefore also question the significant reliance within the SBC Development Strategy on the development of a new garden community at Meecebrook, as set out within proposed Policies 7 and 8, which is estimated to deliver 3,000 homes by 2040 as part of a larger planned new community. Meecebrook alone would account for c.24% of the planned housing target (and over 54% of proposed new allocations / supply sources) for the new Plan period.

We consider that further recognition should be given to the fact that large new communities and urban extensions can experience a significant lag time before new homes begin to be completed within these developments as a result of the complexity of the commercial, delivery and planning requirements associated with these developments.

To take this into account SBC should seek to: reduce the significant reliance it is placing on delivery at Meecebrook; apportion more development to the smaller settlements within the settlement hierarchy; and increase the number of smaller sites that are allocated. This will assist with ensuring that a sufficient mix and variety of sites are available in general, which can facilitate the achievement and maintenance of a five year supply of deliverable housing sites during the lag time before significant delivery takes place at the larger sites, whilst also enabling the sustainable growth to take place at, and support the vitality of, the existing smaller settlements.

Specifically in relation to the identification of housing opportunities at the Tier 5 'smaller settlements' within the settlement hierarchy, as part of this process, we consider that this should include specific allocations of land at the village of Moreton through the Plan. Moreton contains 92 dwellings, as well as a church and community hall and is served by a mobile library. It should be noted that Moreton is not the smallest of the 'small settlements' named within Policy 2 and that some of the other named 'small settlements' are not currently served by any community facilities. The delivery of an appropriate quantum of new development at Moreton would provide an opportunity to support these existing facilities, as well as the potential to deliver new facilities (e.g. children's play area).

The NPPF (paragraph 62) seeks for planning policies to assess and reflect the housing needs (type / size / tenure) for different groups of the community, including those who require affordable housing, families with children and older people.

It is noted that the current Gnosall Neighbourhood Plan highlights the current issue of increasingly unaffordable house prices within the Parish, causing young families and those seeking to retire or down-size, in particular, to have no choice other than to move out of the area. There has also been very little new housing development at Moreton in recent years. The demographic of Moreton village has also become increasingly skewed towards the older age groups.

The new Local Plan provides an opportunity to address this through enabling new housing to be constructed that would be attractive to younger age groups and young families. The delivery of smaller properties could also provide the opportunity for existing residents to downsize whilst still remaining in the village.

The delivery of an appropriate quantum of new development at Moreton would therefore also enable the needs of the community to be met within the Parish and assist with achieving and sustain the vitality and vibrancy of the community at Moreton into the future.

The SBC Strategic Housing and Employment Land Availability Assessment (SHELAA) does not identify any available land within the proposed settlement boundaries for Moreton. Therefore to enable new residential development to be delivered at Moreton there would be a need to make appropriately sized allocations through the emerging Plan. As recognised within the SBC evidence base our clients have promoted land that is available for residential development immediately adjacent to the proposed settlement boundary for Moreton (ref. GNO15 and GNO16).

It is noted from the SBC Site Assessment Profiles (Preferred Options Stage) report that there is existing capacity within the Church Eaton Primary School and King Edward VI High School which can serve new development taking place at GNO15 or GNO16. Site GNO16 provides an opportunity for providing a relatively small development which continues the existing linear settlement pattern of the village. Site GNO15 would provide an opportunity to deliver a more significant development proposal.

Both GNO15 and GNO16 provide an opportunity to incorporate additional community / play facilities commensurate to the size of the site, which would benefit the wider village, assist with attracting additional young families to the village and plug an existing gap in community facility provision.

Our client considers that the eastern end of GNO16, adjacent to the existing public footpath (coloured pink on the plan extract included within the supporting covering letter) would be ideal for accommodating a small play area for children.

In relation to the consideration of potential wider impacts it should be noted that there is existing development between both GNO15 and GNO16 and the non-designated / non-Listed St Mary's Church. The existing roads within Moreton are considered to experience relatively low levels of vehicular traffic. There is also an opportunity to consider improving the passing place facilities on the roads in the wider area leading into the village, as part of the development proposals.

The SBC Landscape Sensitivity Study (October 2021) shows that neither site is adjacent to / within a SSSI / BAS / SAC / Ancient Woodland / SBI / NNR / RAMSAR designated area. Planning application proposals can be supported by information setting out how any ecological / landscape mitigation can be delivered, if required, as part of the design of any scheme brought forward.

In this regard SBC should accordingly expand the proposed settlement boundary for Moreton in order to accommodate a site-specific allocation for at least GNO16, and potentially also GNO15, as part of the Development Strategy in order to ensure that the vibrancy and vitality of this Tier 5 settlement can be sustained into the future.

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:

As identified in the response to Policy 1, Policy 2 identifies that new development will be of a scale commensurate with the position of the settlement in the settlement hierarchy and gives support for new development to be delivered within settlement boundaries. We support the identification of the 'smaller settlements' (Tier 5) within the settlement hierarchy and agree that Moreton should be included within Tier 5.

We however question the achievability of the settlement distribution approach sought through Policy 2 on the basis that (as set out in response to Policy 1) the Development Strategy as currently drafted does not include any completed or committed development or proposed allocations for development within the proposed settlement boundaries shown for the Tier 5 settlements on the Policies Map. The Strategic Housing and Employment and Land Availability Assessment (SHELAA) 2022 Update also identifies only limited available opportunities for development within the collective proposed settlement boundaries for the Tier 5 settlements.

In order to be able to deliver development in accordance with the approach set out in Policy 2 then the settlement boundaries for the Tier 5 settlements need to be drawn in a way that enables a greater amount of development to be delivered within the settlement boundaries. The most certainty for achieving this would be through making specific allocations for residential development.

The Tier 5 settlement of Moreton, for example, has existing community facilities which could support, and be supported by new development. However there is no available land identified within the proposed Moreton settlement boundary to deliver new homes to sustain and meet the needs of the Moreton community. As set out in response to Policy 1, promoted site GNO16, and potentially also promoted site GNO15, provide an opportunity to deliver appropriate housing growth at Moreton as well as provide additional community (play) facilities that deliver benefits to the village as a whole. The emerging Plan should therefore redraw the proposed Moreton settlement boundary to incorporate specific housing allocations on land within these sites to address the existing disparity and enable Policy 2 to be deliverable.

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:

The NPPF (paragraph 34) makes it clear that the policies set out in plans relating to contributions expected from developments, including the levels and types of affordable housing provision required, should not undermine the deliverability of the Plan.

Proposed Policy 23 proposes to set the affordable housing requirement for new residential development on greenfield sites within particular Parishes, including Gnosall Parish, at 20%. The delivery of a reduced level of affordable housing in these Parishes is supported by the scenario testing undertaken within the SBC Local Plan Viability Assessment. The evidence base supports a case for affordable housing to not be higher than 20%. However we consider that there would also be merit in testing the implications of an affordable housing figure of lower than 20% in order to ensure that the approach is suitably robust and to avoid unduly compromising the viability of future residential development.

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:

Policy 24

Accessible and Adaptable Dwellings

The NPPF (paragraph 34) states that Local Plan policies can make use of the Government's optional technical standards for accessible and adaptable housing, where this would address an identified need for such properties. The Planning Practice Guidance (Paragraph: 007 Reference ID: 56-007-20150327) sets out a range of published official statistics and other available datasets which should be taken into account.

It is noted that the Stafford Borough Council (SBC) Economic and Housing Development Needs Assessment (EHDNA) 2020 considers a number of demographic factors in recommending that 10% of new housing is delivered to optional Building Regulation M4(2) standards and 7% of the overall affordable housing need is delivered to optional Building Regulation M4(3) wheelchair accessible standards. We do not however consider it to be appropriate to arbitrarily round up requirements and therefore the proposed requirement for 10% of affordable homes to comply with optional Building Regulation M4(3) standards is not considered to be justified.

Furthermore, given the marginal viability shown through the SBC Local Plan Viability Assessment (September 2022) for many of the development typologies tested, clarity is sought on why sensitivity testing has not been undertaken on different percentages of M4(2) and M4(3) compliant dwellings, including 0%, to understand the implications. We consider that this should be taken into consideration as part of the process to justify this proposed Policy provision, to avoid unduly compromising the viability of future residential development.

Nationally Described Space Standards

The NPPF (footnote 49) also states that Local Plan policies can make use of the Nationally Described Space Standards (NDSS) where the need for an internal space standard can be justified. The Planning Practice Guidance (Paragraph: 020 Reference ID: 56-020-20150327) states that where a need for local space standards is identified this should be justified with reference to: evidence on the size and type of dwellings currently being built in the area; consideration of the impact of adopting the space standard as part of a Plan's viability assessment (including impacts on affordability); and the inclusion of a reasonable transition period following policy adoption.

It is noted that neither the Local Plan Preferred Options consultation document nor the SBC EHDNA nor the SBC Local Plan Viability Assessment have considered the impact of, or provided justification for, the introduction of achieving the NDSS for all dwellings. SBC should therefore not be including a requirement within Policy 24 for all dwellings to achieve NDSS unless this can be properly justified.

Private External Space

The NPPF (paragraph 124) states that planning policies and decisions should support development that makes efficient use of land. The design of each development should accordingly take into account the local area's unique character and density considerations and should therefore be site specific. On this basis it is not considered to be necessary or appropriate to set a minimum size for residential outdoor amenity space through the new Local Plan.

It is noted that the outdoor amenity space sizes stated within proposed Policy 24 replicate those included within the existing Design Supplementary Planning Document (SPD). We consider that an SPD is still a more appropriate place to be setting out such design-specific considerations.

Policy 31

The NPPF (paragraph 62) seeks for planning policies to assess and reflect the housing needs (type / size / tenure) for different groups of the community, including those who require affordable housing, families with children and older people. The NPPF encourages the creation of healthy, mixed and balanced communities.

Proposed Policy 31(Part A) states that particular support will be given to the delivery of one or two bedroom dwellings at the tier 4 and 5 settlements, where there is particular need. The SBC EHDNA (2020) has identified that there is a need for this mix of housing within the rural settlements of the Borough. However, as set out within the responses for proposed Policies 1 and 2, the emerging policies do not provide an effective basis to ensure that residential development will come forward within the proposed settlement boundaries for the rural settlements, particularly the Tier 5 'smaller settlements'.

In order to facilitate this, SBC should be seeking to allocate sites at the Tier 5 smaller settlements, including at Moreton, which can deliver additional housing in a variety of sizes meet the needs of, and assist with sustaining, the rural communities.

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.

SBC has a significant housing need to meet for the next Plan period. In order to deliver the overall housing target within the new Plan period we propose that SBC adopts a strategy that ensures the delivery of sustainable growth through enabling an appropriate amount of development to take place at all tiers of the settlement hierarchy. There is a need to ensure that the Plan encourages the creation of healthy, mixed and balanced communities through enabling the delivery of a range of types and sizes of homes to meet the needs of the communities. In particular the Plan should be facilitating the delivery of homes at the smaller settlements to sustain the ongoing vitality of, and meet the needs of, these communities.

In preparing the next stage of the Plan SBC should therefore recognise the contribution that allocating land for new housing development at the smaller settlement of Moreton can make as part of this strategy. Our client is promoting land at Moreton which is deemed to be: sustainably located; available and suitable for housing development to meet the needs of the new Plan period; and would form a natural and logical extension to the built form of this settlement.

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

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

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

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

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

From: Jessica Graham
Sent: 09 December 2022 17:00
To: Strategic Planning Consultations
Cc:
Subject: Swynnerton Estates - Response to the Preferred Options Consultation
Attachments: Swynnerton Estates - Preferred Options Consultation Response Form.pdf; Swynnerton Estate- Site Locations Plan.pdf; Swynnerton Estate – Site 2 Plan – Land North of Summerfields and Fieldside (YCM06).pdf; Swynnerton Estate – Site 3 Plan – Land North of Yarnfield (YCM08 & YCM04).pdf; Swynnerton Estate – Site 4 Plan – Land South of Yarnfield (YCM11).pdf; Swynnerton Estate – Site 1 Plan – Ex BT Training Site (YCM05).pdf

Dear Sir / Madam,

On behalf of Swynnerton Estates, please find attached their response to the Local Plan Preferred Options consultation.

We have attached the following documents / plans with this response:

- Preferred Options Response Form;
- Site Location Plan – Four Sites adjacent to Yarnfield;
- Site 1 (SHELAA reference YCM05) – Site Plan;
- Site 2 (SHELAA reference YCM06) – Site Plan;
- Site 3 (all of SHELAA reference YCM08 and the western part of SHELAA reference YCM04) – Site Plan; and,
- Site 4 (SHELAA reference YCM11) – Site Plan.

Please can you confirm receipt of these representations?

Kind regards,

Jess

Jessica Graham MRTPI
Associate
Planning



Website : www.savills.co.uk



Contact Details

Full name (required): Joseph Cramphorn

Email (required): 

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

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

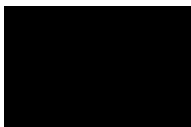
Organisation or Company Name (if applicable): Savills (UK) Limited on behalf of Swynnerton Estates

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:

This response is made on behalf of Swynnerton Estates (the 'Estate') who own land around Stafford Borough. The Estate submitted a number of sites to Stafford Borough Council ('SBC') in 2018 and again in 2020 with supporting representations to the Issues and Options consultation. Following the publication of SBC's Preferred Options plan and confirmation on the proposed spatial strategy, these representations relate to 4 sites adjacent to Yarnfield which the Estate are continuing to be promote for residential and commerical development within the plan. Details of the sites are set out in our response to Policy 12.

Policy 1 – Development Strategy

Policy 1 states that provision will be made for 10,700 dwellings (535 dwellings each year) between 2020-2040. SBC is proposing to contribute 2,000 dwellings towards meeting the needs of adjacent Housing Market Areas ('HMA').

The Estate supports the proposed contribution towards adjacent HMAs, however we do not support the 2,000 dwelling figure. The National Planning Policy Framework ('NPPF') (paragraph 31) and Planning Practice Guidance ('PPG') requires policies to be justified and the evidence base "*needs to inform what is in the plan and shape its development*" (PPG Reference ID: 61-038-20190315). There is no information provided within the evidence base to justify how this figure has been calculated. Additionally, there is no justification on why SBC is not proposing to contribute towards the HMA employment land shortfall which is also significant.

There is an identified shortfall of circa 78,000 dwellings and 73ha of employment land from Greater Birmingham and circa 28,000 dwellings and 210ha of employment land from the Black Country which is significant. It is currently unknown whether there are any unmet needs arising from the North Staffordshire HMA. Paragraph 1.32 of the Housing and Employment Land Requirement ('HELN') Topic Paper sets out that the Black Country authorities have requested for Stafford to take between 1,500-2,000 dwellings to assist in meeting their shortfall. The proposed 2,000 dwelling contribution has not been specifically allocated to an authority by SBC but from the evidence available, it is only a minor contribution which is not proportionate to the shortfall and the strong migration travel to work links Stafford has with the adjacent HMAs (paragraph 1.30 of the HELN Topic Paper).

SBC's proposed spatial strategy is to direct growth to settlements / land outside of the Green Belt. However, the settlements within the Borough's Green Belt are arguably the closest to the authorities with the identified need. Box 4 within the HELN Topic Paper sets out that the proposed 2,000 dwellings HMA contribution will be met through the delivery of the proposed Meecebrook allocation. Box 4 also states that "*meeting unmet housing needs elsewhere in the Borough would be less sustainable and could increase long-distance car commuting*". Directing growth to the sustainable settlements within the Green Belt, will assist in SBC's objective of locating the 2,000 dwelling contribution in locations which are closer to the HMAs and will reduce the impact of 'long-distance' travel.

The NPPF (paragraph 73d) also requires that Councils "*make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation*". The 'Lead-in Times and Built Rates Assumptions' ('LTBRA') Topic Paper sets out SBC's proposed approach to development on the projected delivery timescales for the allocations. SBC is currently projecting for 300 dwellings to start being delivered at Meecebrook from 2030/31 and then consistently throughout the rest of the plan period. It is unclear why the proposed build rates for the site differ from those set out in Table 10 (taken from Lichfields Start to Finish Report) and Table 12 (SBC assumptions) in the LTBRA Topic Paper which both assume that sites of over 2,000 dwellings will deliver 160 dwellings per annum.

Table 5 of the LTBRA Topic Paper shows Lichfields' timeframe assumptions from validation to completion of the first dwellings on a site. For 2,000+ dwellings, the average is 8.4 years. Table 7 shows SBC's assumptions on timescales and this only shows sites of 500+ which SBC consider will only take 4.5 years from validation and completion of the first dwellings. We consider that SBC should review these assumptions and align the proposed lead-in times for Meecebrook with Table 5.

In light of the above, it is considered that SBC may need to identify additional sites to meet any shortfalls from the proposed Meecebrook allocation. If additional sites were to be identified then new allocations should be directed to the most sustainable settlements in the Borough which are within close proximity to the HMAs with the identified shortfall. The Estate is promoting four sites within Yarnfield which is a Tier 4 settlement. We acknowledge that the sites are within the Green Belt. However, given the serious question marks over the deliverability of Meecebrook and the significant HMA housing shortfalls, it is considered that SBC could be able to demonstrate exceptional circumstances to justify the release of Green Belt land (NPPF paragraph 141).

Supporting paragraph 1.13 of Policy 1 states that “*housing in the borough’s rural communities is allocated in the larger settlements...which have more services and facilities*”. However, SBC is only proposing to direct 4% of the total housing growth to the Tier 4 settlements. In the ‘Revised Settlement Assessment and Profiles’ Topic Paper Yarnfield scores 8 which is the same as Woodseave where 125 dwellings are proposed to be allocated. We do not consider that SBC’s proposed approach to the amount of growth being directed to Tier 4 settlements is justified or sound as it is contrary to the proposed spatial strategy and evidence base.

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

No

Policy 2 Comments:

Policy 2 states that “*new development will be of a scale commensurate with the position of the settlement in the hierarchy*”. Yarnfield is proposed as a Tier 4 ‘larger settlement’.

We note that Table 1 of the HELN Topic Paper sets out that there has been a 49.62% increase in the number of dwellings delivered in the settlement since April 2022 (260 completions). The Sustainability Appraisal (paragraph 5.2.34) also noted that Yarnfield has seen high growth between 2011-21. This growth has primarily been the result of the redevelopment of vacant training land. It is also not clear why development is not being directed to settlements just because they have experienced growth within the adopted plan. If there is sufficient existing and / or proposed infrastructure to accommodate the growth then the scale of growth delivered in a settlement previously should not be a factor that counts against it in determining whether it is suitable for more growth up to 2040.

Policy 5. Green Belt

No

Policy 5 Comments

The Policy states that “*inappropriate development will not be permitted in the Green Belt unless very special circumstances exist. Development proposals, including those involving previously developed land and buildings, in the Green Belt will be assessed against the relevant national planning policy*”. It is considered that this section of the policy should be subdivided. It is correct that the NPPF (paragraphs 147 and 148) requires very special circumstances to be demonstrated when considering inappropriate development. However, there are exceptions to this requirement which are listed within paragraphs 149 and 150 of the NPPF. It is considered that the policy should be amended to more clearly state what the exceptions include.

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 11. Stafford Station Gateway

Yes

Policy 11 Comments:

The Estate fully support the allocation of their land (the former Stafford Rugby Club site) within the proposed Stafford Station Gateway. The Stafford Station Gateway site is located within the Stafford's urban area, is brownfield, in close proximity to the range of shops, services and facilities provided in Stafford and immediately adjacent to the train station so its redevelopment aligns with national and local objectives. The Estate and their Development Partner (HarperCrewe – please see separate response submitted by HarperCrewe) will continue to work with SBC and other landowners / developers involved to deliver the Gateway site and the vision proposed.

Policy 12. Other housing and employment land allocations.

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

No

Policy 12 Comments:

As set out in our responses to Policies 1 and 2, we consider that more growth should be directed to the sustainable Tier 4 settlements, such as Yarnfield.

With consideration to SBC's proposed spatial strategy and the settlement hierarchy, the Estate is still promoting the following sites adjacent to Yarnfield through the Local Plan Review. All of the sites are considered to be available, suitable and achievable for development and are of different scales depending on what level of growth is directed to the sustainable Tier 4 settlement of Yarnfield. Site Location Plans have been submitted with this response for each of the sites:

- Site 1 (SHELAA reference YCM05) – 1.5ha residential use (and potential community use / facility). The site is immediately adjacent to existing to recently constructed residential development and is considered to be well-contained by existing trees and hedgerows. Any development on the site could provide improvements to the existing Public Right of Way.
- Site 2 (SHELAA reference YCM06) – 1.7ha residential use (and potential community use / facility). The site is immediately adjacent to residential development and is considered to be well-contained by existing trees and hedgerows.
- Site 3 (all of SHELAA reference YCM08 and the western part of SHELAA reference YCM04) – 12.5ha residential use (and potential community use / facility). The site is immediately adjacent to the settlement edge and is boundary by existing residential development to the north, west and south as well as woodland to the east and the Yarnfield Football centre to the south.
- Site 4 (SHELAA reference YCM11) – 0.5ha commercial use through the redevelopment of the existing farm buildings. Part of the site is located within the HS2 safeguarding area which is considered to be a short-term constraint on the deliverability of the site. However, the Estate understands that as part of the HS2 works, upgrades are being made to Yarnfield Lane which is considered to be a benefit.

All of the sites were assessed as being unsuitable for development within the SHELAA 2022 primarily due to their location within the Green Belt and not as a result of any significant environmental or heritage constraints. As set out in our response to Policy 1, it is considered that due to the significant HMA shortfall, there could be exceptional circumstances to justify the release of Green Belt in the plan. Paragraph 142 of the NPPF states that where Green Belt is released, Local Planning Authorities should look at ways for compensatory improvements to the environmental quality and accessibility in remaining Green Belt land to be delivered. Should the Estate's sites be allocated within the plan, then potentially land elsewhere in the Estate's ownership could be used to deliver additional green infrastructure and biodiversity improvements to mitigate against the loss of Green Belt adjacent to the sustainable settlement of Yarnfield.

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

Completed forms can be submitted by email to:

strategicplanningconsultations@staffordbc.gov.uk

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

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



Swynnerton Estates- Site Location Plan



Swynnerton Estates- Site Plan
Site 1 Ex BT Training Site, Yarnfield
Site area: 1.5ha





Swynnerton Estates- Site Plan

Site 2 Land north of Summerfields and Fieldside, Yarnfield

Site area: 1.7ha





Swynnerton Estates- Site Plan
Site 3 Land north of Yarnfield, Yarnfield
Site area: 12.5 ha





Swynnerton Estates- Site Plan
Site 4 Land south of Yarnfield, Yarnfield
Site area: 0.5 ha





BACKGROUND CHECKS
 DEBT & GOODS RECOVERY
 PRIVATE INVESTIGATIONS
 CLOSE PROTECTION
 SURVEILLANCE
 MISSING PERSON TRACING
 MATRIMONIAL INVESTIGATIONS
 LAND AGENTS
 LAND REGISTRY ENQUIRIES
 COUNTY COURT PREPARATION
 LICENSING DISPUTES
 DEVELOPMENT/PLANNING
 MIMI VEHICLE INVESTIGATION
 & EXAMINATIONS (CIVILIAN)

Attention of [REDACTED]

STAFFORD BOROUGH COUNCIL

Civic Offices

Stafford

THIS DOCUMENT SERVED AT THE COUNCIL OFFICES BY HAND AND BEFORE THE 12-00pm deadline on Monday 12th December 2022.

This document dated Friday 9th December 2022: IN THE MATTER OF THE STAFFORD BOROUGH DRAFT LOCAL PLAN (recently released for Public Consultation).

THIS MATTER CONCERNS/ RELATES TO IMMEDIATE AVAILABILITY FOR POSSIBLE RESIDENTIAL NEW BUILD, MIXED DEVELOPMENT, UNDER CONSIDERATION FOR RENTAL OCCUPATION ONLY. SUCH PROPOSALS REFLECT 20-25 DWELLINGS.

We are writing to make the SBC authority aware of such proposals on the West side of Yarnfield, The stables, Yarnfield lane, Yarnfield, Stone, Staffordshire ST15 OGH. The stables and horse/equine transport in operation since 1984.

These stables with a 24/7 Equine business use formed part of the Yarnfield Croft development (10 dwellings) formerly Yarnfield House, permitted for residential development by the Inspector for and on behalf of the Secretary of State. Meeting the development conditions set down by that Inspector, the following services were installed on the said land:

- 1/ Mains Water
- 2/ Mains Electricity
- 3/ Fowl and storm water
- 4/ Mains Gas
- 5/ BT Telephone underground cables facility (not a condition)



This land and development served by its own Entrance and Egress meeting Highways policy, splay conditions and road safety issues. HS2 development (presently going ahead) will use the direction of travel/traffic flow, hence the stable complex and residents in Yarnfield will be served by the close "Trunk road- Swynnerton/Stone" road network. It will not have escaped the attention of Stafford Borough Council that this site is an oven ready development which will not require the inconvenience of serious infrastructure works. Over some years, we have attempted to engage with the local council without any response.



ST9 Investigations Limited



FROM THE LEGAL & ENFORCEMENT SECTION

Company registration No. 09488158 [REDACTED]

Worthy of mention, on land in my ownership in Biddulph (Staffordshire Moorlands District Council) for 130 dwellings and both sites being that authorities Preferred Options within the Local plan. Our Planning Consultant (Nina Pindham- Planning Barrister, No5 Chambers. Birmingham) advised that Inspector Mr Mark Dekayne rejected that poorly drafted and presented Local Plan and was not fit to be put on deposit. In retaining the Barrister for this site in Yarnfield, we wish to avoid such an outcome with this Stafford Borough Council Local Draft Plan.

In our submission, accommodation for those wishing to have the opportunity of a home of their own should take preference to the provision of accommodation for a number of horses. This development being an extension to the Yarnfield Croft 10 new build completed a short time ago and we now formerly present the above site to be included and accepted as a Preferred Option for residential development by Stafford Borough Council which can be commenced forthwith.

Mr Robert James Simcock Eng FIMI MISM

For and on behalf of ST9 Investigations Limited -Land and Property Development.

[Redacted signature line]