

THE PLAN FOR STAFFORD BOROUGH DEVELOPMENT PLAN DOCUMENT

EXAMINATION 2013

HEARING STATEMENT ON BEHALF OF MAXIMUS STRATEGIC LAND

MATTER 4: POLICY STAFFORD 2 – NORTH STAFFORD

Key issue:

- a. Is the Strategic Development Location at North of Stafford appropriate, effective, sustainable, viable, deliverable, fully justified and soundly based...*

POLICY STAFFORD 2 – NORTH OF STAFFORD

1. Policy Stafford 2 proposes 3,100 new dwellings in two broad locations across the north of Stafford, along with 36 ha of employment land between the M6 and the A34. The Strategic Development Location (SDL) includes saved Local Plan allocation HP13, which in August 2012 was awarded consent for up to 409 dwellings following the approval of outline application 10/13362/OUT.
2. Taylor Wimpey North Midlands Ltd now control HP13, having purchased the site from Akzo Nobel UK Ltd. They recently secured Reserved Matters approval for 257 dwellings pursuant to outline approval 10/13362/OUT and it is reasonable to assume that works will soon commence on site.
3. The proposed employment allocation is under the control of Staffordshire County Council and The Cantrill Family. The County Council has already secured outline planning permission for a scheme comprising 28.19 ha of Class B1, B2 and B8 uses following the approval of application 12/17038/OUT on the 12 October 2012. This approval also permitted works to Redhill roundabout and a new access into the site, works to which have now commenced.
4. The larger housing site identified in the plan to the east, which is controlled by Maximus Strategic Land, has been actively promoted through the Plan process. To the north of saved Local Plan allocation HP13 is the residual land area owned by Akzo Nobel, and together with the Maximus land, forms the housing component of the northern SDL to which Policy Stafford 2 relates.
5. Both Maximus and Akzo Nobel have worked with the Borough Council in order to demonstrate the deliverability of this SDL. A Statement of Common Ground between the main parties has been prepared to establish the main areas of agreement. There are, however, certain matters which Maximus is unable at this stage to agree. In

particular, the quantum of land required to deliver the proposed level of growth, along with the necessary infrastructure and services, remains an area of disagreement. This issue is considered in more detail below.

6. Maximus and Akzo Nobel are, however, fully committed to delivering housing to meet the needs of the town and in accordance with the requirements of Policy Stafford 2. To support the proposal a joint Framework Plan has been produced and this was the subject of consultation with the residents of Stafford town (and outlying areas) earlier this year. The purpose of this exercise was to involve local people and seek views/ideas for the development of the area. The Framework Plan as well as a copy of the consultation leaflet is contained at **Appendix 1**. A Consultation Report which outlines the joint consultation process that took place and the key issues that the proposed development north of Stafford raised, is contained at **Appendix 2**.
7. The consultation was based on an area of land that Maximus and Akzo Nobel consider realistic in terms of delivering the levels of housing growth and other supporting infrastructure and development as set out under Policy Stafford 2, which therefore extends beyond the area that the Council are proposing to allocate.
8. Whilst collaborative work has taken place, both sites are separate entities, and inevitably certain issues can be considered independently. As far as Maximus is concerned, a considerable amount of work has been produced (and shared with the Council) to demonstrate the sites sustainability and suitability for housing development. The following technical evidence has been submitted to the Borough Council, including as part of our formal representations on behalf of our client, Maximus, to the Pre-Submission version of the Borough Plan:
 - New Buildings Farm Flood Mapping Study Option H Technical Note
 - New Buildings Farm Flood Mapping Study – Hydraulics Modelling Summary Report
 - Preliminary Drainage Appraisal Rev A
 - Ecological Appraisal
 - Protected Species Survey Summary
 - Transport Strategy
 - Review of Traffic Implications
 - Sewer Capacity Study – Hydraulic Modelling Summary Report
 - Landscape and Visual Appraisal
 - Archaeological Desk-Based Assessment
 - Drawing Number: BIR.2908_02-1C – Illustrative Framework Plan
 - Consultation Leaflet
 - Drawing Number: BIR.2908_02-2 – Illustrative Framework Plan

9. This evidence has been used to inform the illustrative layouts for the site. Fundamentally this information, in conjunction with the evidence produced by the Council underlines the soundness of the site as a housing allocation, fully justified on the basis of evidence.
10. In terms of the evolution of the site, the original masterplan submitted to the Council in 2010 proposed 3,000 dwellings plus employment land and was designed to meet the development proposed in the Council's Issues and Options document (February 2009). This level of development was consistent with the Council's Infrastructure Strategy (July 2009) and the design was informed by a Landscape and Visual Appraisal (LVA) of the Site prepared by Pegasus Environmental (see **Appendix 3**). The LVA in particular found that the site is well contained with only short (filtered) and mid distance views of the site from the east and west, otherwise the majority of views are from the site boundaries. It is clear therefore that the Site is of low visual sensitivity.
11. The masterplan for the site has however evolved since then. The changes that have been made have resulted in a reduction in the number of dwellings proposed to take account of constraints on the site which now corresponds with the Council's latest aspirations for this part of the SDL of 2,000 dwellings. Nonetheless, the changes that have been made remain consistent with the landscape strategy and recommendations made in the LVA.
12. The most recent masterplan, which was submitted as part of the representations to the Pre-Submission consultation stage, proposed 2,000 dwellings, a primary school, two local centres, Suitable Alternative Natural Greenspaces (SANGs), POS, flood alleviation proposals and associated storm water attenuation, access and landscaping. It also illustrated the initial proposed route of HS2 (Phase Two) in order to provide the Council with an understanding of how this could impact the Site, which illustrates how the route would provide an effective physical boundary to the settlement of Stafford in this location.
13. Separate discussions have taken place with HS2 Ltd to establish whether or not they would object to residential development in this location. HS2 Ltd have confirmed that that due to the early stages of the scheme design, and given that there is a live consultation exercise taking place on the proposed Phase Two route, they were unprepared to make specific comments (see **Appendix 4**). Although the route has yet to be safeguarded the latest masterplan provides for a significant buffer to the route and illustrates that the proposed development would not give rise to conflict with the proposed line. Furthermore, it is notable that the initial proposed route is shown running through a cutting, substantial in places, which would suggest that visual and noise impacts would be considerably less than stretches where the route is on a raised viaduct.

14. Maximus has also discussed the emerging proposals with the Ministry of Defence (MoD) since 2009 to ensure that development of the Site would not prejudice activities taking place on its land. Indeed, discussions took place regarding the possibility of providing new housing for personnel returning to Stafford Barracks as part of the BORONA project, however it is now understood that the MoD is able to accommodate housing needs on land in its ownership. Overall the MoD has no major in-principle concerns regarding the development of Land north of Beaconside, including land south of Sandon Road which directly abuts Stafford Barracks (see **Appendix 5**).
15. Since the Pre-Submission consultation closed, the Plan for Stafford Borough: Spatial Plan for Education (August 2013) and the County Council's Integrated Transport Strategy (August 2013) reports have been published. These documents have raised two key issues. Firstly, the potential need for a new secondary school as a result of growth north of Stafford rather than contributions towards the expansion of Sir Graham Balfour High School and The West Road Academy; and secondly, Staffordshire County Council's formal identification of a new local distributor road north of Stafford as their preferred strategy for increasing highway capacity to accommodate new housing and employment growth of the town as a whole.
16. With regards to the Integrated Transport Strategy (August 2013), it is a clear position that the development of the Maximus site does not necessitate the provision of a local distributor road in order to be delivered. Evidence previously submitted by Maximus clearly demonstrates that well in excess of 2,000 dwellings could be delivered subject to works to junctions with Beaconside. This position is further underlined in an updated Transport Strategy prepared by DTA which is contained at **Appendix 6**. Nonetheless, we have updated the illustrative framework plan to show one possible way in which the site could be developed to include a new local distributor road through the site. It is clear that this level of detail is capable of resolution through negotiation such that the relevant parts of the County Council's aspirations for a road can be accommodated within the sites that form the SDL.
17. In terms of the Spatial Plan for Education (August 2013), this report introduces the potential need for a new secondary school over the Plan period. Whilst developer contributions will be expected from all new housing developments towards new education provision, the report does underline the difficulties in securing land for a secondary school. As part of the amendments to the Illustrative Framework plan we have shown a possible location for a new secondary school (see **Appendix 7**). Introducing a secondary school north of Stafford will increase the sustainability of the proposal and the SDL as a whole by significantly reducing vehicle movements, and expanding the range of facilities and services that are available within easy walking distance of new residential communities. At this point in time the provision of the secondary school has not been confirmed with the education authority, however Maximus clearly has sufficient land to accommodate primary and secondary schools,

albeit that the allocation boundary will need to be amended to ensure capacity for the housing proposed as well.

18. The extent of land required to deliver the level of new housing proposed, together with all other development, facilities and infrastructure requirements, in the most sustainable manner, remains an issue between Maximus and Stafford Borough Council on which agreement has yet to be reached. As proposed, the allocation identified by the Council amounts to approximately 79 ha with an area of approximately 57 ha identified for housing. The Council anticipate that this area will be capable of accommodating circa 2,000 dwellings at 30 dph.
19. Our concern is that the Council identified this area early in the plan preparation process, and has not subsequently taken into account the substantial body of evidence that has been produced by Maximus and submitted to support the allocation of a wider area. The Council seems to be relying on a rather simplistic “net housing density” figure to establish the amount of land required. A net figure would of course include access roads in the site, car parking and incidental open space but would exclude, amongst other things, distributor roads, primary (and now a secondary) schools, open space serving a wider area along with significant landscape buffers, and local centres (see Annex C of former PPG3 contained at **Appendix 8**). These uses are of course key components of a sustainable urban extension.
20. It is also considered that the Council has not properly taken account of the constraints and opportunities within the wider site, as set out in the substantial body of evidence submitted in support of their proposals by Maximus. In particular, the Council appears to have overlooked the fact that a small area of land is the subject of a covenant (in favour of the MoD) that prohibits housing. Whilst the covenant would not prevent use for some open uses, it nonetheless influences the developable area and consequently will have a bearing on the level of housing that can be provided on this part of the site. Likewise, discussions have taken place with the Environment Agency to deal with flooding issues particularly downstream of the site, including setting aside an area for flood storage which has the potential to take properties downstream out of flood risk. This is an important component of the scheme as the development offers the opportunity to have a significant positive impact on properties further downstream in Stafford town. This betterment adds to the overall sustainability of the proposal. Details of this element of the scheme are set out in the New Buildings Farm Flood Mapping Study Option H Technical Note included as part of our pre-submission representations.
21. We believe that in identifying land for new housing the Council has also overlooked the need to provide local centres, storm water attenuation areas (as distinct and separate from the flood alleviation scheme), as well as a mix of formal and informal open space within the new residential communities. In addition, because of the proximity of the site and indeed Stafford to the Cannock Chase Special Area of Conservation (SAC), the requirement to provide for some level of SANGs has been a

factor influencing the design of the scheme. All of these uses require land well beyond the simple gross/net ratio seemingly adopted by the Council, but can be accommodated within land under the control of Maximus, as illustrated by the latest framework plan contained at **Appendix 7**.

22. Whilst we believe that it is probably possible for 2,000 homes to be provided on the Council's proposed land allocation we are firmly of the view that the opportunity exists to improve significantly the sustainability of the proposal through the provision of a proper range of services, facilities and infrastructure that will better enable the site to deliver the objectives of Policy Stafford 2, by extending the area identified as an allocation. In addition, the Council's proposed allocation boundary is not, in our view, based on the level of evidence we have produced which clearly identifies an emerging scheme that can be delivered over the wider area that Maximus has always promoted, including land to the east around Sandon Road, which evidence shows (LVA and Council's Landscape Characterisation Assessment) is of low landscape sensitivity. Therefore, the benefits of extending the allocation to accord with the proposal put forward by Maximus would far outweigh any disadvantages and we ask the Council to consider modifying the plan accordingly.