

# **The Plan for Stafford Borough Examination**

## **Response to Matter 4**

On behalf of Commercial Estates Group  
(ID Ref: PS568)

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Appendices

### **Appendix 1**

Infrastructure Delivery Schedule for Stafford North and  
Stafford West

### **Appendix 2**

Site Context Plan for Stafford East

# 1. Stafford Town (Policies Stafford 1 – 4)

## Question 4.1

- 1.1. For the reasons set out in response to the Development Strategy (Matter 3), the overall amount of development that should be afforded to the Town should be increased, reflective of the need to deliver a greater quantum of development Borough wide and in order to meet objectively assessed housing needs, including delivery of affordable housing.
- 1.2. Our evidence suggests that the housing figure for the Borough should be increased to in the order of 13,000 to 14,000 dwellings. Respectively this would require delivery of approximately 10,000 new homes in Stafford Town (i.e. 72% in accordance with Spatial Principle 4). Based on data contained within the Council's Background Paper (ER: K1) i.e. factoring in completions and commitments as at 31 March 2013 (262 and 1,505 dwellings respectively), this would leave a residual requirement of approximately 8,233 dwellings (the Council's current figure is 5,433).
- 1.3. We would note that any requirement for the MoD should be in addition to this requirement (a principle point established previously at the RSS Phase II Revision EiP).
- 1.4. On this basis alone, it is evident that the overall quantum of development being promoted in Policy Stafford 1 falls short of that requirement to satisfy the requirement of the NPPF to meet objectively assessed housing need, both in terms of market and affordable housing.
- 1.5. In terms of the spatial distribution of growth to the Town itself, we agree with the promotion of development into three broad locations (north, east and west of the Town). The proposed SDL's have long been identified and promoted by the Council in delivering future housing and employment growth and are the most appropriate solution given the absence of any significant and available brownfield land and mindful of other environmental constraints elsewhere in the Borough.
- 1.6. However, we consider that the distribution of development between each of the three SDL's is unsound. Stafford East which is most deliverable has been identified by the Council for the least amount of housing development during the plan period. Further comments on the delivery of development in each of the three SDL's are outlined below.
- 1.7. Mindful that we consider that the overall housing requirement for the Borough should be increased, additional land in the Town will need to be sourced in order to meet the housing requirement. In this regard, representations have previously been submitted on behalf of CEG suggesting that Stafford East be extended to accommodate additional development

(housing and potential other uses) to meet this need and make best use of the planned infrastructure in this location. This 'reasonable alternative' has been ignored. The merits of an extended site are further set out below.

- 1.8. Additionally, consider that the proposed extensions to the north and west of the town will not deliver their full allocations in the plan period given their sheer scale and very substantial level of supporting infrastructure required. The evidence base documents submitted by the Council in support of the draft Plan provide no further clarity in this regard and therefore such an approach is unjustified and therefore unsound.
- 1.9. For these reasons, we do not consider that the Plan as currently drafted is sound as it will not deliver the planned amount of development in the plan period.

#### **Question 4.2 (a)**

- 1.10. Whilst we have no objection in principle to development at Stafford North, the Plan and its supporting evidence base documents stay silent on the timing and phasing of its delivery, other than the assumption that the whole site will come forward within the plan period (i.e. between now and 2031).
- 1.11. Given this, we have undertaken our own review of the likely timeframe for implementation and whether it is likely that the full development will be delivered within the plan period.
- 1.12. Based on a series of reasonable and informed assumptions, the table at Appendix 1 demonstrates that the earliest development is likely to start on site is 2018, factoring in time to secure outline consent and subsequent reserved matters approval, through to sale of the first phases of development and a start on site.
- 1.13. We would note that this is an extremely conservative estimate for a number of reasons:
- The Statement of Common Ground (E97) agreed between the Council and the promoters of Stafford North confirms that the concept diagram provided by the Council is not agreed, with the promoters seeking a different configuration and additional land;
  - No application has yet been submitted for development; and
  - Once development approvals have been secured, the need for significant upfront infrastructure including in respect of highways and education.
- 1.14. We have assumed an average sales rate of four dwellings per month per house builder (50 market sales per year per developer); three house builders starting on site consecutively in 2018 with dwelling occupations from 2018 onwards, the site could potentially yield a maximum of 2,000 dwellings during the plan period to 2031 (assuming a yield of up to 150 dwellings per annum with a slower start at the beginning of the development). This is

significantly less than the Council's anticipated 3,100 dwellings and does not make any allowance for the need for upfront infrastructure delivery prior to occupation of dwellings.

- 1.15. In this regard, the Infrastructure Delivery Plan (IDP) (ER: D57) indicates more masterplanning and technical work is required to inform the development of a more significant infrastructure package to make development at Stafford North acceptable in transport terms. We understand that a new Northern Access Route between the A34 and Sandon Lane, parallel to, but to the north of the existing A513 Beaconside, is now considered the favoured solution. The IDP suggests that the bulk of the improvements will be delivered through Section 106 and Section 278 agreements, although there is recognition that improvements to the A 513 Beaconside are likely to require additional funding potentially via the Community Infrastructure Levy.
- 1.16. Improvements to the existing A34 Junction with Beaconside and the initial section of Beaconside have already been secured through the County Council development at Redhill and other adjacent committed residential proposals at a cost of £4.5m. However, it is acknowledged that further improvements to the A34 junction require third party land and are, as a consequence, undeliverable, meaning that the junction will act as a throttle to traffic.
- 1.17. The IDP refers to a package of improvements along the A513 Beaconside (primarily dualling and signalisation of junctions) totalling in the order of £7.3m of which £5m is committed, with the remainder required from developer contributions through the Local Transport Plan/CIL.
- 1.18. Subsequent discussions undertaken by CEG's highway advisors (Bryan G Hall) with the County Council have indicated that its preferred option is a local distributor road from the A34 to Sandon Road (north), north of Beaconside A513. There is the potential to convert the Redhill Business Park junction to a four arm roundabout to serve the A34 junction of the new local distributor road. The new distributor road would be associated with signalisation of the existing A34/A518 junction (already committed) along with other localised improvements on the A518 Beaconside, including a linked traffic signal system.
- 1.19. Further work is required by all parties in ensuring a deliverable transport solution for the site as a whole and to demonstrate the approach is sound.
- 1.20. Similarly, work is continuing in assessing the education requirements, in particular at a primary and secondary level, associated with bringing forward this scale of development.
- 1.21. For these reasons, it is highly unlikely that the site will deliver the anticipated quantum of development in the plan period, it is also most unlikely to deliver more than approximately 37 dwellings in the first five years of the plan (based on the assumptions outlined at Appendix 1). It will therefore make no material contribution to the Council's five year housing land supply position. This is an authority that has been persistently under-delivering and

therefore should be seeking to accelerate housing delivery in the first five years as set out in response to Matter 3.

- 1.22. There remains an underlying lack of evidence at this stage which justifies the Council's approach and, as a result, the overall housing strategy being promoted by the Council is being brought into question.
- 1.23. The Council needs to be positively planning for additional growth in and around the town, including more development in Stafford East where development is already well underway (in planning terms), to ensure that the housing requirement of the Borough can be met in the plan period and there is a continual rolling five year housing land supply.

### **Question 4.3 (a)**

- 1.24. Whilst again, we have no objection in principle to the promotion of Stafford West, the comments and concerns highlighted above with regards the deliverability of Stafford North are equally applicable to the western extension also.
- 1.25. Most notably, applying a similar trajectory Stafford West is unlikely to deliver the full anticipated quantum of development (2,200 dwellings) in the plan period.
- 1.26. Whilst Stafford West is being promoted by a consortium which includes at least one housebuilder, the largest constraint on delivery (particularly early on in the development) is the need to implement the Western Access Improvement Scheme (WAIS) which includes third party land and a new bridge across the West Coast Mainline (involving Network Rail).
- 1.27. The Western Access Route is divided into four parts and is expected to be delivered as follows:
- Martin Drive to Doxey Road, through Section 278/Section 38 developer works;
  - Improvements to the West Coast Mainline bridge, SCC and Developer Contributions, although clearly subject to the bridge improvements being acceptable to Network Rail;
  - Doxey Road from the bridge to Pans Drive through Section 278/ Section 38 developer works (both the Strategic Development Location and adjacent development proposals); and The link from Doxey Road/Pans Drive to the A34 (SCC funding and CIL receipts). This section costs £13m and there is therefore currently a significant funding gap to complete the link.
- 1.28. However, it should be noted that County Highways has indicated that a development of up to 400 homes (principally accessed from Doxey Road) could be built out with upgrades to Martin Drive prior to construction of the western access improvements from Martin Drive to Doxey Road. It is indicated that this would accommodate development in the first five years



of the plan period.

- 1.29. The cost of the Western Access Improvements is £38m to deliver. A number of the elements are specifically referenced in the IDP, including Martin Drive to Doxey Road at £2m, the upgrade to the railway line at £4.65 m and the Pans Drive to the A34 Foregate Street section at £13 m.
- 1.30. A major scheme business case was submitted in 2010 for the Western Access but funding was not secured for the scheme following the abolition of the Regional Funding Allocations Process. Bryan G Hall's discussions with the County Council have indicated that SCC is therefore revising the proposals and it is now envisaged that the improvements will be delivered through a combination of developer contributions via S106 and S278 agreements as well as SCC and DfT funding. The LTP Settlement for post 2015 has since secured £16.4 m for Stafford which will include delivery of Section A of the Western Access Road from A34 Foregate Street to Doxey Road. ). A design team has been appointed for the scheme, and it is currently being value engineered.
- 1.31. The remaining sections of the Western Access Road are considered to be primarily access roads for unlocking development e.g. the extension of Martins Drive, and it is understood that the developer is currently assembling land etc. in order that the access roads can be delivered.
- 1.32. As a final point the IDP indicates that Network Rail have indicated that there is a window of opportunity for the bridge works in 2017 as it corresponds with planned works on the West Coast Mainline more generally.
- 1.33. Given this, there is much uncertainty as to the deliverability of Stafford West to the full extent envisaged by the Council both in terms of land availability (and the potential need for a CPO), infrastructure and more generally in terms of timing within the plan period.
- 1.34. Clearly further work is required by all parties in ensuring a deliverable transport solution for the site as a whole.
- 1.35. Similarly, work is continuing in assessing the education requirements, in particular at a primary and secondary level, associated with bringing forward this scale of development.
- 1.36. Given this, the evidence base submitted by the Council in support of Stafford East raises issues of viability and there is reference to the site potentially not being able to contribute a full 30% affordable housing.
- 1.37. There remains an underlying lack of evidence at this stage which justifies the Council's approach and, as a result, the overall housing strategy being promoted by the Council is being brought into question. Our comments with regards the need to consider additional

alternatives including a wider extension of Stafford East, apply equally here.

#### **Question 4.4 (a), (b) and (c)**

- 1.38. There is strong support for the identification of Stafford East as a Strategic Development Location to deliver future mixed use development.
- 1.39. By way of context, the Stafford East site is surrounded by many local amenities due to its close proximity to Stafford Town Centre. Amenities within a 0.5km radius include a nursery, pharmacy, two schools – King Edward IV High School and Western Road High School, informal open space and sports facilities at the Beaconside Sports Centre.
- 1.40. In terms of accessibility, there is an existing bus route which passes along Tixall Road and a vast number of services passing along the A518 to the north of the Strategic Site.
- 1.41. The principle of residential development at this location; comprising two sites north and south of Tixall Road, has already been established through the granting of two outline planning applications (Refs: 13/18697/OUT and 13/18698/OUT) in August 2013. Cumulatively these schemes deliver up to 634 dwellings in total – 373 dwellings on land to the north and 261 on land to the south of Tixall Road, which includes 30% affordable housing provision. Part of the land north of Tixall Road is also reserved for expansion of the existing cemetery.
- 1.42. Most notably, both sites deliver the proposed Beaconside Extension in full. This provides an alternative route between St Thomas Lane and the Weston Road/Beaconside/Hydrant Way roundabout (across Tixall Road). The benefits to be gained from this link road include a reassignment of a number of vehicle movements from Blackheath Lane between St Thomas Lane and Weston Road junction to the proposed Beaconside Extension by providing a more direct route north and south. This will be of benefit to both traffic arising from the new development and also to existing road users of the local highway network.
- 1.43. The Stafford East site is sustainable, viable and deliverable with a real prospect of starting to contribute to the delivery of housing in the short term and will deliver up to 261 new family homes, including up to 78 affordable dwellings to help meet need as identified in the Council's SHMA. It will provide a greater choice of housing and competition in the market around Stafford Town, which is considered essential in driving the housing market out of recession and supporting economic growth. In this regard, it has good synergy with existing and newly proposed employment development at the Beaconside Employment Park immediately to the north of the site.
- 1.44. Additional benefits include the provision of new school places at the primary, secondary and post-16 levels and New Homes Bonus payments in excess of £2m to facilitate the improvement of services, facilities and infrastructure.

- 1.45. As part of the consented schemes, public transport and accessibility and connectivity improvements will be implemented, including an increased frequency of the existing bus route (841) along Tixall Road to a half hourly service; the creation of a new Baswich Walking and Cycling Route, connecting Baswich (to the south) with employment, training and education opportunities in the vicinity of the site; and new pedestrian and cycle routes along Tixall Road.
- 1.46. There is on-site provision of Public Open Space, with a contribution towards swimming pools, sports courts/halls and artificial turf pitches to assist in the delivery of sports and recreation facilities in the local area.
- 1.47. The scheme has also been sensitively designed to respect the wider landscape character of the area and the importance of St Thomas Priory. Other environmental constraints, including the presence of a high pressure gas main through the site, have also been taken into consideration.
- 1.48. Stafford East is the only one of the three SDL's to currently have planning permission across the full site. Whilst only in outline at this stage, is it now being actively marketed and it is envisaged that development will commence in 2014. It is clearly capable of delivering a substantial amount of development in the early years of the plan and will make a material contribution to the five year housing land supply (both in market and affordable terms) and help meet housing requirements more generally in the Borough.
- 1.49. Notwithstanding, there is scope to extend the proposed extension further east (see enclosed plans at **Appendix 2**). Representations have previously been submitted to the Council promoting a wider extension in this location but this option has not been taken forward as a reasonable alternative by the Council (post the Issues and Options stage) for reasons that remain unclear, particularly in light of our more general comments on the overall housing strategy and need to identify additional land for housing in Stafford Town to deliver development to meet objectively assessed housing need identified in the plan period.
- 1.50. One of the key benefits of additional residential development in this location is that it will help address the likely shortfall in housing as set out in response to Matter 3 (and above), including provision of much needed market and affordable housing (at 30%).
- 1.51. It also has the ability to deliver a new primary school (factoring in the increased need for new pupil places arising from the already consented phases of development) and growth more generally in the area, including the recently committed expansion of the MoD with additional homes for returning military personnel.
- 1.52. In transport terms, additional development could also facilitate further localised improvements including an improvement in the alignment of Baswich Lane that crosses the

floodplain areas, the River Sow itself and the Staffordshire and Worcestershire Canal. It has been suggested that this scheme, which would involve the realignment of Baswich Lane and improvements to the river and canal crossings, has an estimated cost of £4 million (albeit this amount is to be confirmed) and that the funding source for this improvement will be Integrated Transport Strategy or Community Infrastructure Levy. Such measures would complement the implementation of the Beaconside Extension and wider package of sustainable transport measures that have already been committed.

- 1.53. To this end, a wider extension at Stafford East is considered to be deliverable and will assist the Council in delivering much needed housing growth in a highly sustainable location and well within the plan period as a whole.









- Site boundary
- - - Gas line
- ⌘ Sensitive building
- - - Sewage works
- - - Accesss to sewage works
- Road extension
- Historic
- Pylons
- Trees
- Water
- Woodland
- Density