



Examination of the Plan for Stafford Borough Matter 4.2 Policy Stafford 2 – North of Stafford Submission of Lufton & Associates for Clarkes Farms

POLICY STAFFORD 2 – NORTH OF STAFFORD

- a. Is the Strategic Development Location at North of Stafford appropriate, effective, sustainable, viable, deliverable, fully justified and soundly based, including:
- i. The overall amount, mix, location, deliverability, viability and timing of new housing development (3,100 houses), including affordable housing;
 - ii. The overall amount, nature, location, deliverability, viability and timing of new employment development (36ha);
 - iii. The scale, nature, delivery, funding, viability and timing of proposed infrastructure requirements, including highway capacity and public transport improvements (including Northern Access Improvement Scheme), drainage and flood management works, utility and telecommunication services, education and health facilities, and mitigation of the impact of development on Cannock Chase SAC (including SANGS);
 - iv. The design of the proposed development, including the "neighbourhood" approach,** provision of retail, education, health and other facilities, integration with the rest of Stafford, and provision of on-site renewable/low carbon energy solutions;
 - v. Impact of the proposed development on the environment, including the landscape, ecology, historic environment and surrounding countryside, and existing services;
- b. Does the infrastructure and other evidence (including transport assessment) properly assess the likely level of proposed housing, employment and other development in terms of infrastructure requirements and impact of the proposed development?
- c. Is the extent of the proposed allocation sufficient to deliver the scale of proposed development and the associated infrastructure?
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For ease of reference the Strategic Development Location promoted at Beacon Farm, north-east Stafford is referred to as BF_NES and the Strategic Development Location, north of Stafford identified in policy 2 of the Publication Plan is referred to as P2_NS_3100 in this statement.

Background

Lufton & Associates made extensive representations and objections to The Plan for Stafford Borough (Pre-Submission) consulted on to 28th February 2013. These representations focussed on the promotion of land at BF_NES as a strategic development location for major housing development of 1,000 dwellings in two phases from 2020.

As well as advocating the planning, sustainability and accessibility case for BF_NES a number of objections were directed to the scale of development proposed at P2_NS_3100 and a number of shortcomings identified in the planning strategy for the Borough. The objections [A18] to P2_NS_3100 in summary relate to matters of;

- scale of the allocation, the over-reliance on a single site to deliver 43% of the housing provision for Stafford town;
- the shortcomings and vagueness of the transport strategy to mitigate the traffic from North of Stafford;
- the loss of historic landscape features;
- the incursion of development into open countryside;
- the lack of integration and relationship with surrounding land-uses;
- and
- the encroachment into areas of significant biological importance. [A18]

In setting out desired changes to the Publication Plan the representations advocated reducing the scale of the North of Stafford allocation to 1,500 to 2,000 dwellings and provision of a more comprehensive framework to demonstrate how P2_NS_3100 (reduced to 1,500 – 2,000 dwellings) would integrate with existing employment and communities and better reflect the local biological constraints.

In April 2013 Stafford Borough Council produced a Planning Strategy Statement [A13] and Addendum Sustainability Appraisal [A10] that included and assessed BF_NES along with small number of **other 'reasonable alternative locations'**. In response to a number of issues raised Lufton & Associates made further extensive representations on behalf of Clarkes Farms and produced and submitted a 'Planning, Sustainability and Accessibility Case' for BF_NES within the statutory consultation period to 31st May 2013 [A23 pages 42-64].

BF_NES is advocated as a more sustainable, more accessible and more acceptable location in planning terms to provide a strategic allocation for 1,000 new dwellings in

the plan period for Stafford town to 2031. In the light of more investigation and indicative master-planning of BF_NES the promotion of the scale of 1,000 dwellings is reinforced. A significant driver for this is the desire to accomplish the on-site development of a 1FE primary school.

Respecting the position of the housing apportionment has not changed from the Submission Plan and is allotted to Stafford town, Stone, the key service villages and the remainder of the Borough modification to the plan is sought by reduction of the P2_NS_3100 allocation by 1,000 dwellings. No objections have been raised to the overall scale of the housing requirement in the Borough to 2031 or the distribution as set out in Spatial Principle SP4 [A1 p.31] and Table 6.54.

The appraisal of the potential of BF_NES for development in the Revised Sustainability Appraisal Report – Addendum [A12 pages 5-6] undertaken by the Borough Council in May 2013 is challenged. In particular reading the appraisal of BF_NES alongside the appraisal of the P2_NS_3100 in the Revised Sustainability Appraisal Report [A10 pages 101-102] it is considered unbalanced and unsound.

The following section is a comparative sustainability assessment of BF_NES and P2_NS_3100.

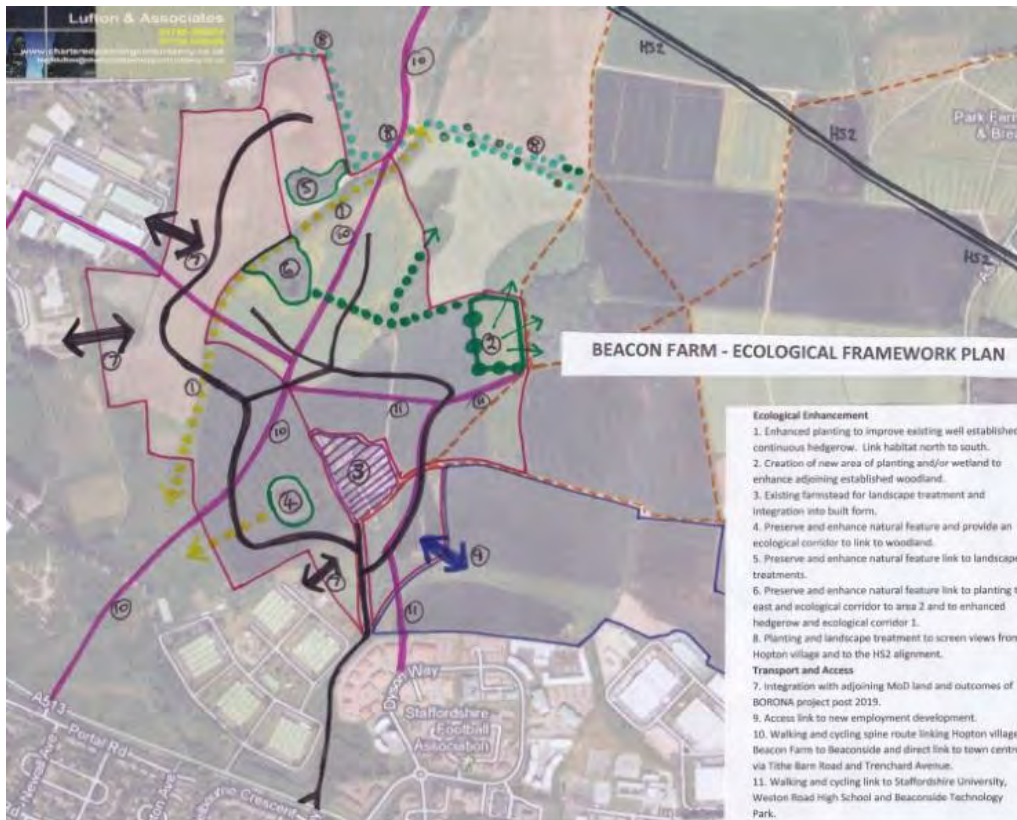
It reflects the eight key issues and challenges of the Publication Plan at paragraph 4.1 and the 12 key objectives for Stafford at paragraph 5.2, the scope of the District Council's sustainability appraisal work [A10 and A12], the vision of the Staffordshire Sustainable Community Strategy (2008-2023) [E104] and the vision and objectives of the Stafford Borough Partnership Sustainable Community Strategy (2008-2020) [E105].

Plans A to D below are taken from the BF_NES Planning, Sustainability and Accessibility Case [A23]. Plan E below is the Concept Plan for P2_NS_3100 [E92]. These are referred to in the assessment below.

Plan A BF_NES



Plan B BF_NES



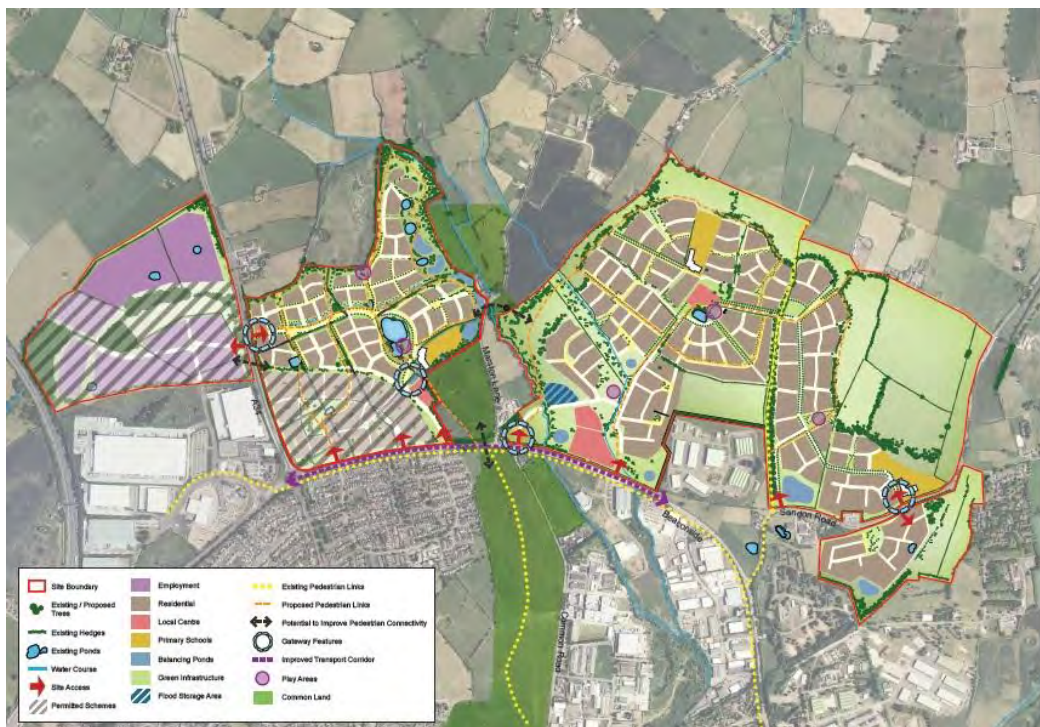
Plan C BF_NES



Plan D BF_NES



Plan E P2_NS_3100



Comparative Sustainability Assessment of BF NES and P2 NS 3100.

Assessment criteria	BF_NES	P2_NS_3100
Provision of new high quality homes.	Significant contribution to housing requirement of Stafford town.	
Create new communities with a full range of supporting infrastructure.	Indicative land-use plan A includes a range of community and supporting infrastructure.	Concept plan E includes a range of community and supporting infrastructure.
Contribute to affordable housing stock.	Supporting Planning, Sustainability and Accessibility [A23] indicates compliance with Local Plan policy 30%. Addressed in modification policy PS5 North-East Stafford.	Requirement in Policy Stafford 2 – North of Stafford [A1] – 30%.
Access to closest areas for local employment.	Good access to local employment areas of significant scale – including Staffordshire University, SDGH and Technology Park (Plan D).	Good access to local employment areas of light industrial employment and distribution uses. Close proximity of Redhill employment park.
Access to a wider range of job opportunities and employment.	<p>There is a net inflow of commuting to the town of about 2,000 workers (2001 Census).</p> <p>Of those commuting beyond the town boundaries just over 11% commute to other towns and parts of the Stafford Borough and 13.5% to the other districts of Staffordshire. Other commuting flows are unremarkable except for the West Midlands (6.8%) with Wolverhampton and Birmingham the most significant.</p> <p>Almost two-thirds of Stafford residents work in the town with the concentration of higher employment densities in the town centre. BF_NES is more accessible to the town centre than P2_NS_3100.</p>	
Access to new local employment opportunities.	Adjacent employment land allocation.	Employment land allocation adjacent separated by A34 dual carriageway.

<p>Avoid risk to aggravating flooding.</p> <p>Risk of flooding in new development.</p> <p>Water Quality</p>	<p>Addressed in modification policy PS5 North-East Stafford.</p> <p>No record of flooding on BF_NES. No water courses, aquifers or reserves of significance. Ecological Framework Plan (Plan B) affords area to be a net store of surface water and offer flood mitigation measures to the wider area. Agreed policy PS5 would include reference to SUDS and provision of flood storage.</p>	<p>Requirement in Policy Stafford 2 – North of Stafford [A1] for drainage and flood management scheme.</p>
<p>Potential to support existing high schools and FE colleges.¹</p>	<p>Addressed in modification policy PS5 North-East Stafford.</p> <p>Good access to Weston Road Academy.</p>	<p>Requirement in Policy Stafford 2 – North of Stafford [A1].</p> <p>Good access to Sir Graham Balfour.</p>
<p>Proximity and ease of access;</p> <ul style="list-style-type: none"> - to local shopping facilities; - health facilities, GP etc; - public open space and leisure facilities. 	<p>Local shopping facilities are within a 20-25 walking time (shown at appendix i, figure 5.4, D25).</p> <p>Good access to Beaconside Health Centre (shown at appendix ii, Plan F).</p> <p>Access to off-site open space. Good access to Beaconside Leisure Centre (open to public) (shown at appendix ii, Plan F).</p>	<p>Local shopping facilities are within a 15-35 walking time (shown at appendix i, figure 5.4, D25).</p> <p>Access to Holmcroft Road Surgery (shown at appendix ii, Plan F).</p> <p>Access to off-site open space (shown at appendix ii, Plan F).</p>
<p>Provision for;</p> <ul style="list-style-type: none"> - local shopping facilities; 	<p>Indicative land-use plan A includes provision of local shopping facilities and extensive areas of public open space.</p>	<p>Concept plan E includes provision of local shopping facilities and extensive areas of public open space.</p>

¹ Examination library document D53 covers matters of secondary school pupil projections and the impact of proposed strategic development locations in the Borough. Two clusters of secondary schools in Stafford town are identified as ‘North’ and ‘South’. Cluster north includes Weston Road Academy and Sir Graham Balfour High School and separation of projections and discernible pupil numbers for each school is not possible.

<p>- health facilities, GP etc;</p> <p>- public open space and leisure facilities.</p>		
<p>Access to existing public transport services.</p>	<p>Good access to existing public transport services. Arriva (the main service provider in Stafford town) services 5A, 11, 11A within 350m. Services 5A and 73 serve Staffordshire Technology Park. Services 74, 75 and 825 serve University campus. Until recently service 9 ran a continuous loop between west and NE Stafford with a bus every 8 minutes at peak times (shown at appendix iii Plan G [reproduced D25 figure 5.1] and Plan H).</p>	<p>Access to limited services (shown at appendix iii Plan G [reproduced D25 figure 5.1] and Plan H).</p>
<p>Access to main town centre services and shopping areas.</p>	<p>Approximately 2km from closest part of BF_NES to town centre (Local Plan boundary). Access route requires traversing major highways.</p>	<p>Approximately 3km from closest part of P2_NS_3100 to town centre (Local Plan boundary). Access route requires traversing major highways.</p>
<p>Impact on road safety and contribution to reducing road accidents.</p>	<p>Dependant on final highway design, junction arrangement and provision for pedestrian and cycle access.</p>	
<p>Topographical aspects and setting in the landscape.</p> <p>Impact on character and integrity of Landscape</p>	<p>In terms of an objective assessment of landscape quality BF_NES and PS_NS_3100 are not identified by the Staffordshire and Stoke-on-Trent Planning for Landscape Change Supplementary Planning Guidance (SPG) 2001 as areas of high sensitivity. The policy objectives of the extant guidance for the area divides BF_NES into two parts to the west as landscape enhancement and to the east as landscape maintenance. PS_NS_3100 is identified as landscape restoration.</p> <p>More recent analytical work on the historic landscape character (see Plan 11 [A23 p.52]) undertaken by Staffordshire County Council and English Heritage</p>	

	<p>indicates that BF_NES exhibits character of 18th and 19th century planned field systems and 19th century squatter enclosure. PS_NS_3100 is characterised by a mix of 19th century squatter enclosure, 18th and 19th century planned field systems, piecemeal enclosure and post 1880 small fields (see Plan 11 [A23 p.52]).</p> <p>In terms of the sensitivity of the historical landscape character to accommodate change the County Council have assessed the majority of BF_NES as medium with a small area south-west of Hopton village as high (see Plan 12 [A23 p.55]) and PS_NS_3100 as low, medium and high. The high sensitivity area of PS_NS_3100 extends across the whole area from south-west to north-east high (see Plan 12 [A23 p.55]).</p> <p>In relation to BF_NES none of the higher ground to the north-east of the town is proposed for development. The proposed development area is all lower-lying land under the protection of Beacon Hill and a natural ridge line to the north. PS_NS_3100 is open land with no natural topographical enclosure.</p>	
Impact on Cannock Chase SAC.	Addressed in modification policy PS5 North-East Stafford.	Requirement in Policy Stafford 2 – North of Stafford [A1].
Impact on heritage assets.	Negligible impact on built heritage assets. Loss of a small area of high sensitivity historic landscape.	Negligible impact on built heritage assets. Loss of an area of high sensitivity historic landscape.
Impact on biodiversity and habitats.	<p>BF_NES is not covered by any significant ecological designations.</p> <p>The woodland at Beacon Hill, adjacent BF_NES, is recognised and included in the Inventory of Woodland and Trees administered by English Nature and recorded as deciduous biodiversity action plan priority habitat (see Plan 8 [A23 p.50]). As indicated through the indicative Ecological Framework Plan (Plan B) it is anticipated that the development of BF_NES</p>	<p>PS_NS_3100 development areas surround Marston Lane SBI. The SBI is not proposed for development. The SBI designation is not specially addressed by policy 2 – North of Stafford [A1].</p>

	would provide enhancement to the established woodland with adjoining complementary planting and/or wetland and habitat creation.	

The sustainability assessment uses no weighting or scoring has been applied to the criteria and the categorisation is based on a simple threefold classification;

red - where the issues are assessed as negative, requiring significant mitigation and/or are a more major constraint to development.




amber - where the issues are moderately negative, requiring some mitigation and/or are a moderate constraint to development.

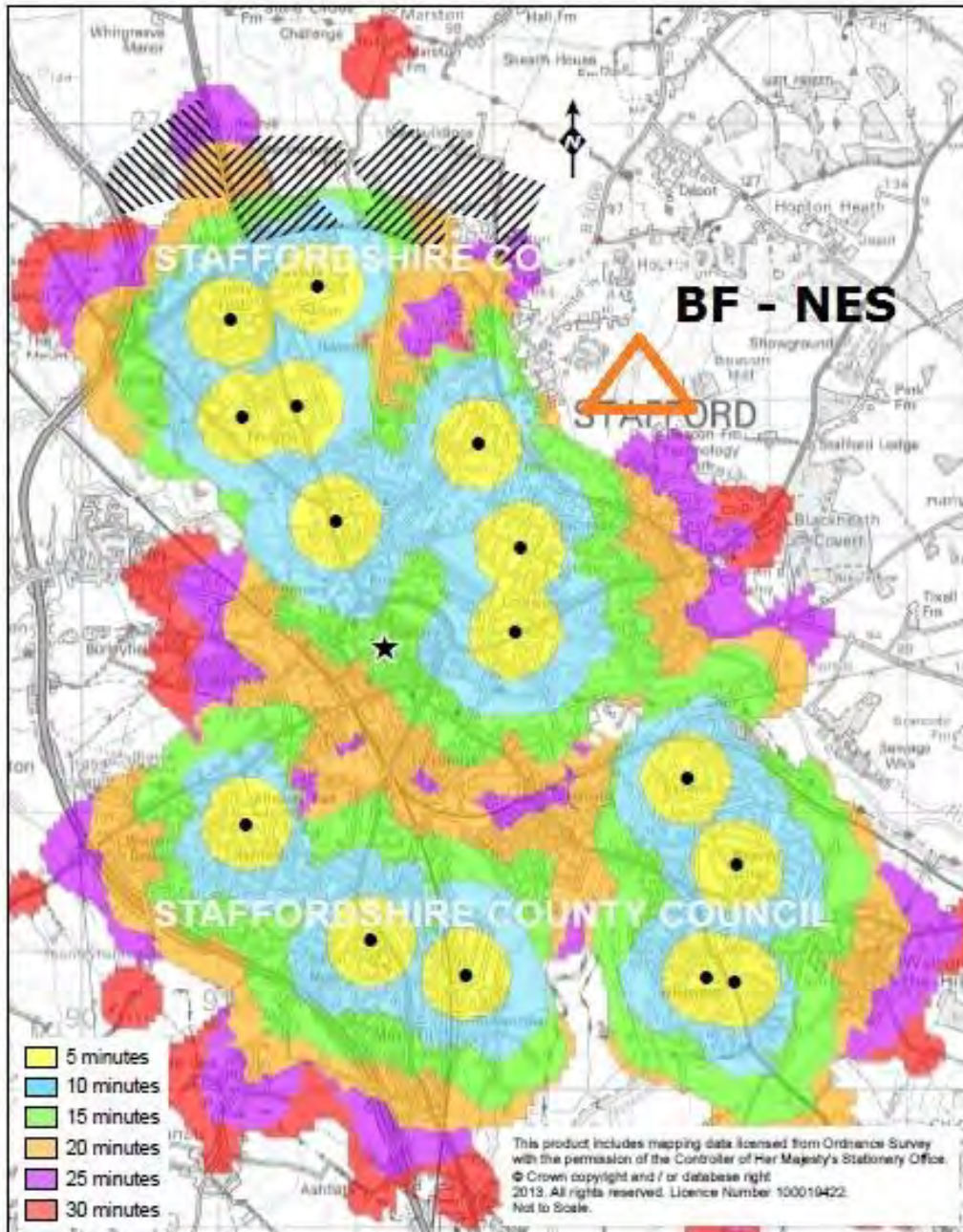
green - where the issues are only slightly negative or neutral or positive, easy or unnecessary to mitigate and or/are not a constraint to development.

Both BF_NES and P2_NS_3100 perform well in a number of respects and many issues can be addressed by design and master-planning. In a number of areas though BF_NES performs better than P2_NS_3100 in matters that are either very difficult or impossible to mitigate (such as assimilation into the landscape) or could eventually be mitigated but would have a long negative lead in time (such as availability of public transport services).

Appendix i

Figure 5.4 : Walking Times to Local Facilities

 Proposed Northern Direction of Growth
  Town Centre
  Local Facilities



Appendix ii

Plan F

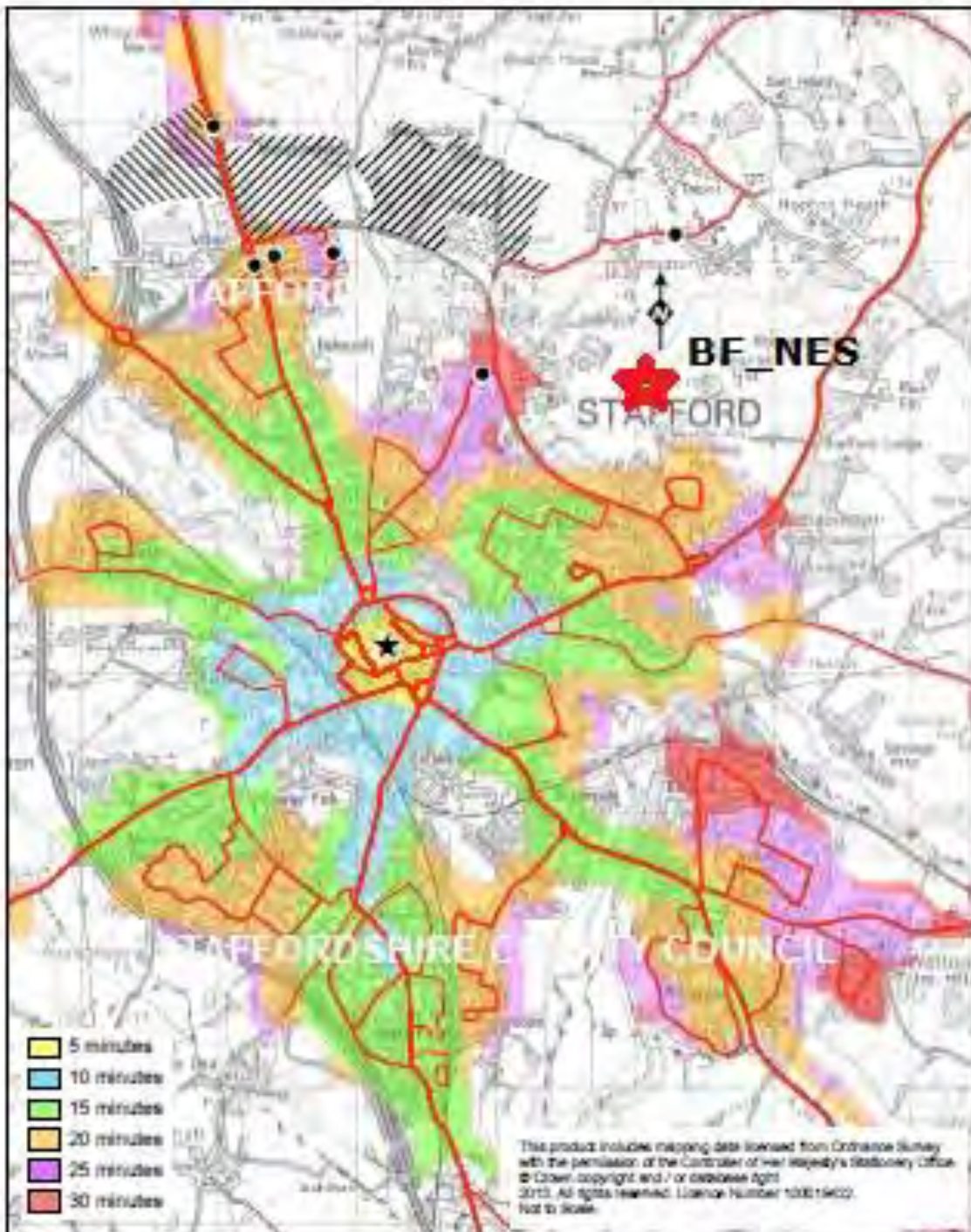


Appendix iii

Plan G

Figure 5.1 : Bus Journey Times to Stafford Town Centre
(Including walking to and waiting time at bus stop)

▨ Proposed Northern Direction of Growth — Bus Routes ● Bus Stops ★ Town Centre



Plan H

