



Examination of the Plan for Stafford Borough Matter 4.1 Policy Stafford 1 – Stafford Town Submission of Lufton & Associates for Clarkes Farms

4e. Have other potential Strategic Development Locations been properly assessed including Clarkes Farm?

The Strategic Development Location promoted at Beacon Farm, north-east Stafford for ease of reference in this statement is referred to as BF_NES (a location plan is provided at appendix (i) consistent with page 43 of A23).

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.

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].

Reflecting a need to challenge the Borough Councils observation in their assessment that the land promoted at **BF_NES was 'high and visually prominent'** work continued on a producing a visual assessment. This was not submitted in the statutory consultation period and sent to the Borough Council on the 15th July 2013 with a request that be it made publicly available. It is respected that there was not a requirement for the Borough Council to do so.

The Visual Assessment Addendum completes the 'Planning, Sustainability and Accessibility Case' for BF_NES (attached as appendix ii).

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 North of Stafford Strategic Development Location in the Revised Sustainability Appraisal Report [A10 pages 101-102] it is considered unjust and unsound.

It is acknowledged that some of the difficulty of the appraisal arises as the BF_NES proposal was less advanced for detailed consideration to be made. This has been somewhat rectified in the submission of the Planning, Sustainability and Accessibility Case (May 2013) [A13] to advance the proposal. However, a number of 'high-level' principle assumptions that had been made in the Sustainability Appraisal were simply unjust and unsound.

It is the view of Lufton & Associates that a plan strategy that is based on this comparative sustainability appraisal evidence is unsound and seek a main modification to the Plan to include BF_NES as a strategic development location.

A comparative approach to a planning-based sustainability appraisal is set out in the Examination statement made to matter 4.2 North of Stafford where it appears most appropriate and relevant for the Examination to consider.

This statement is submitted **to help the Inspector's** consideration of Matter 4.1e.

The focus of the statement is on the potential to deliver housing on BF_NES and it covers and updates matters of;

- access,
- the relationship with the adjoining MoD site of Beacon Barracks,
- developer interest,
- transport assessment, highway and traffic mitigation issues,
- modification to Publication Plan for Stafford Borough and policy for inclusion.

Access and the Adjoining MoD Site



It is anticipated that the main access to BF_NES will be from a new road of appropriate highway standard with provision for pedestrians and cyclists from the A513 Beaconside broadly following the alignment of the metalled track to the farmstead that

exits the A513 northwards opposite Gladstone Way [A23 p.62 Plan 17].

The access is in the ownership of ISE Estates Ltd the adjoining landowners of Staffordshire Technology Park and while no agreement has been achieved it is anticipated that the negotiation of access and land ownership can be resolved well within the anticipated development timeframe. A potential secondary access to BF_NES from the A518 Weston Road is unimpeded and in control of the landowner.

There is also pragmatic opportunity to integrate proposals at BF_NES with the adjoining MoD Beacon Barracks that could include a significant cycle and pedestrian link to the benefit of the whole area and potentially a further secondary road access to Sandon Road (B5066) [A23 p.61 Plan 16 and p.62 Plan 17]. A **possible approach would be to agree a 'land-swap' with DIO to release a land-strip** to widen the access to BF_NES from the A513.

At present the general view of DIO has been that the primary concern is to protect the operational security of Beacon Barracks. The future changes to the MoD presence in the town though are potentially far reaching [A23 p.57]. Extensive redevelopment of Beacon Barracks was permitted under application 09/13073_FUL by the Borough Council on 23rd May 2011 following 15 months to agree a s.106 agreement and has not yet commenced.

Developer Interest

There are currently no option agreements or other contracts related to BF_NES.

Discussions have been taken place with a number of major developer interests (primarily national housebuilders) since January 2013 and visits have been made by developer representatives. These discussions are on-going. No third party investor, land intermediary or land speculator is involved.

Transport, Accessibility and Highway Improvement Considerations

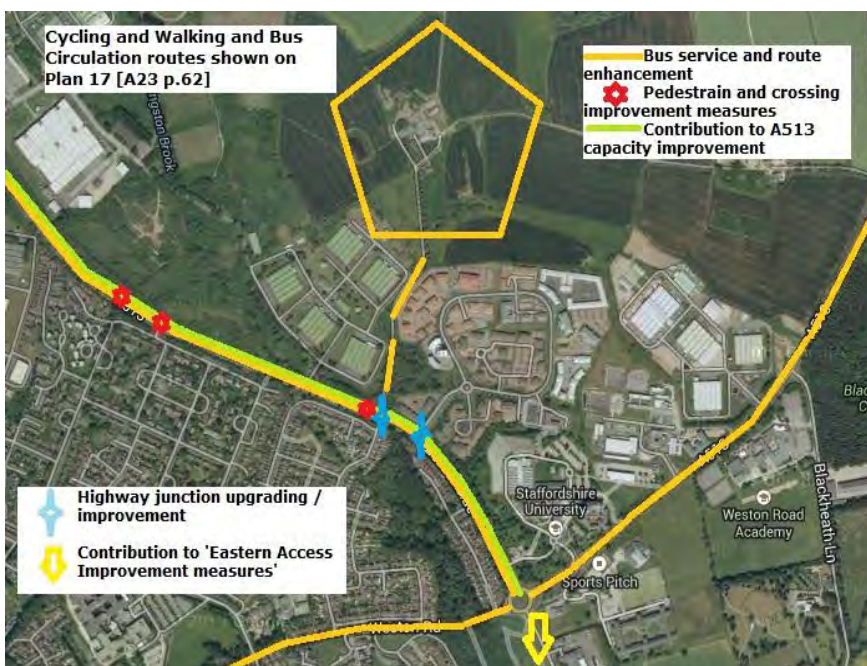
A brief transport and accessibility case is made for the allocation of BF_NES in the response made [A23 p.61-64] to the Planning Strategy Statement [A13]. It is acknowledged that the transport evidence to support the allocation is not detailed and specific as those strategic allocations identified north, east and west in the Plan and has not been modelled and assessed by the County Council or their consultants.

By virtue though of the location of BF_NES with the main access proposed to the A513 Beaconside it falls within the study area of documented transport evidence to support the northern direction of growth [D25] and is highly relevant and proximate to the evidence in relation to the case for the Eastern Distributor Road [D24, D21]. There is further evidence to support the transport and accessibility case for the allocation in 2008 Atkins Transport Study and the Stafford Borough Integrated Transport Strategy 2013-2031 [D18].

In relation to the above documented transport evidence a number of key points are identified;

- the general engineering approaches taken to the wider traffic mitigation on Beaconside (A513) would be similar to those supporting a north-east direction of growth as a northern direction of growth (including a partial dualling of the A513).
- the mitigation of traffic from new development from a BF_NES provides a better strategic fit to link highway improvements to the southern end of Beaconside (A513) through the Weston Road roundabout and to the proposed Stafford Eastern Access Improvement [Plan D21].
- the visibility, controlled traffic speed, the distance and arrangement of the existing signalised junction to Dyson Way and road safety record for Beaconside (A513) offer no impediment to an adequately engineered junction solution to provide access to BF_NES [A23 p.62 location as shown on Plan 17].
- as a wider traffic mitigation strategy from new development BF_NES offers potential to link to secondary accesses east to the Weston Road (A518), west to the Sandon Road (B5066) and to integrate with the planned redevelopment of the adjoining Beacon Barracks [A23 p.62 Plan 17].

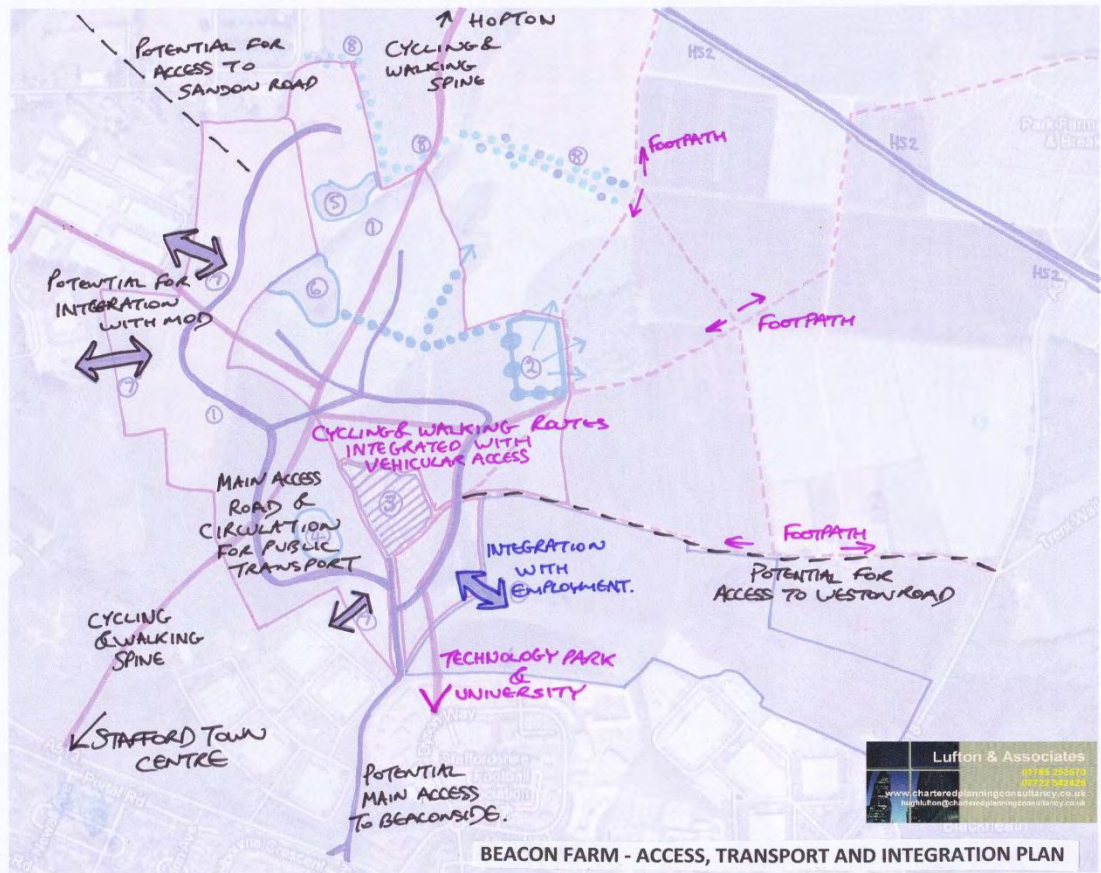
- BF_NES is a much less peripheral location to Stafford town centre than the northern strategic direction of growth [D25 Figures 5.1, 5.2 and 5.3 reproduced as appendix iii, iv, v].
- BF_NES has more potential to link to existing bus services than the northern strategic direction of growth [D25 Figure 5.1 reproduced in appendix iv].
- BF_NES has more potential to link to the existing cycling network and is a shorter cycling time to the town centre than the northern strategic direction of growth [D25 Figure 5.2 reproduced in appendix iv].
- BF_NES has more potential to link to good pedestrian routes and is a shorter walking time to the town centre than the northern strategic direction of growth [D25 Figure 5.3 reproduced in appendix v].
- BF_NES is promoted as a new urban extension north-east of Stafford with provision for a 1FE primary school, extensive public open space, a public park and a local centre to reduce the need to travel and promote the use of sustainable transport modes [A23 p.45 Plan 2].
- BF_NES is well related to existing employment locations, Staffordshire Technology Park, Staffordshire University and Stafford Hospital and adjoins the strategic allocation for employment to extend Staffordshire Technology Park [A23 p.61 Plan 16].



Proportionate to the generation of additional traffic arising from the development of 1,000 new dwellings at BF_NES consistent with the integrated nature of the indicative Masterplan [A23 p.45 Plan 2] to reduce the demand for travel the expectation is that the development, subject to phasing, would contribute to;

- extension and improved service to public transport (bus) services to the north-east of the town connecting in with the Hospital, University and Technology Park.
- improvement and extension to cycling routes connecting to the town including integration with the town centre link of the Isabel trail and **provision of a 'cycling and walking spine' through BF_NES and connecting** Hopton, through north-east Stafford (potentially through the redevelopment of Beacon Barracks) to a 2.5km route to the town centre [A23 p.61 Plan 16].
- pedestrian environment improvement measures and controlled crossing, refuges or other measure to reduce severance of the A513.
- provide a circulation route at the north-east destination for bus services across Stafford town.
- re-engineering and upgrading of the A513 junction – A513/Gladstone Way/Beacon Farm Drive.
- as part of wider development contribute to re-engineering and upgrading of the A513 junction – A513/Dyson Way (with possibility of re-engineering two junctions together) and potentially re-engineering and upgrading A513 junction – A513/Sandon Road.
- proposed **wider 'eastern access improvement measures'** [D21] in particular the improvement of capacity of the southern section of the A513 to Weston Road roundabout and provision of real-time PT information (along A518).

Access, Transport and Integration Plan (Plan17) from 'Planning, Sustainability and Accessibility Case' [A23 p.62]



Recommended Modification to Publication Plan for Stafford Borough - Policy for inclusion

POLICY STAFFORD 5 - NORTH-EAST OF STAFFORD

Within the area North-East of Stafford identified on the Policies Map, a sustainable, well designed mixed use development will be delivered by 2031.

Any application for development on a part or the whole of this area must be preceded by, and consistent with, a Master Plan for the whole Strategic Development Location which has been submitted and agreed by the Council.

Development must deliver the following key requirements:

Housing

- i. Delivery of approximately 1,000 new homes with 30% being affordable housing in the context of Policy C2 through a mix of housing types, tenures, sizes and styles with proportions of 2, 3 and 4 bedroomed properties in the context of Policy C1;
- ii. Provision to meet the needs of an ageing population through new extra care and specialist housing;

Link to Employment Land Development

- iii. Delivery of housing aligned with the delivery of at least 20 hectares of new employment land with comprehensive links and access across the development areas;

Design

- iv. The development takes place on a 'neighbourhood' approach with the provision of a mix of uses including local retail facilities, social and physical infrastructure, a primary school, extensive public open space, strategic landscaping and ecological mitigation;
- v. The proposals must relate to the whole Strategic Development Location or, if less, do not in any way prejudice implementation of the whole development;
- vi. Strategic landscaping and planting will reflect the planned alignment of the proposed HS2 rail line;
- vii. The development will be based on using sustainable construction methods in the context of Policy N2;

Environment

- viii. A comprehensive drainage and flood management scheme will be delivered to enable development of the Strategic Development Location including measures to alleviate flooding and improve surface water management;

ix. The development will provide on-site renewable or low carbon energy solutions including associated infrastructure to facilitate renewable energy solutions in the context of Policy N2;

x. Necessary measures to avoid and mitigate the impact of development on the Cannock Chase Special Area of Conservation including Suitable Alternative Natural Greenspace will be provided;

xii. Existing hedgerows, tree lines and water features to be retained and enhanced to support the provision of a network of green infrastructure allowing wildlife movement and linked habitat and access to open space;

Transport

xiii. An access, transport and travel plan strategy for the Strategic Development Location that maximises travel and accessibility by non-car transport modes via safe, attractive and conveniently designed street, pedestrian and cycling connections within the development and to Stafford town centre, nearby existing and new employment areas. The strategy shall identify road access points to the site and between the site and the existing settlement. It shall also identify construction access arrangements that do not disrupt existing residents and improvements to transport capacity along the A513 Beaconside Road and the Weston Road roundabout;

xiv. There will be an interconnected network of streets serving the development producing discernible and distinctive neighbourhoods and places integrated and linked to existing areas;

xv. Support the delivery of the Eastern Distributor Road;

Infrastructure

xvi. Highway capacity improvements and a suitably engineered standard junction from A513 Beaconside, will be required North-East of Stafford with enhanced bus services;

xvii. Suitable Alternative Natural Greenspace (SANGS) required through on-site / off-site provision / management at Cannock Chase;

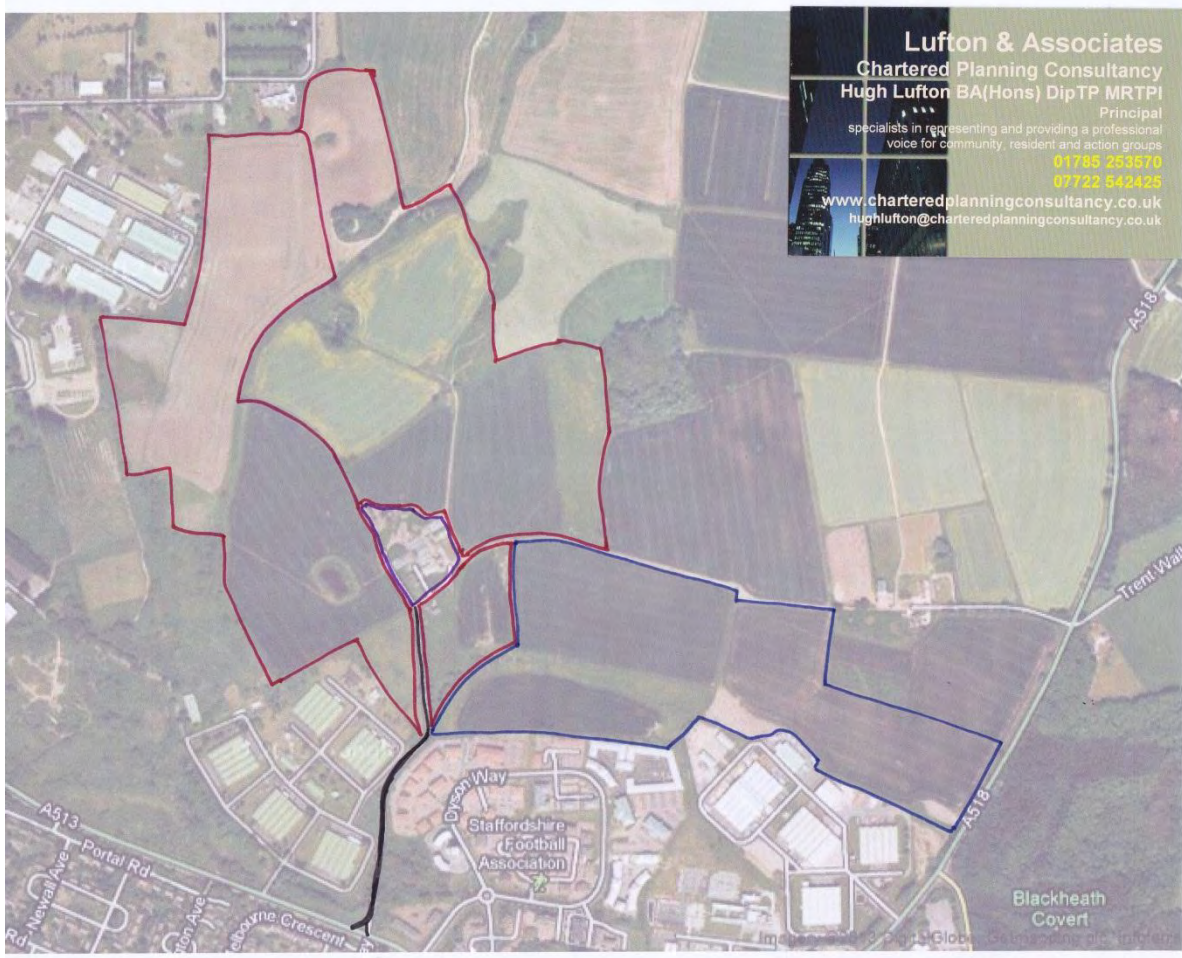
xviii. Electricity connections and sewage capacity improvements required to meet additional housing development;

xix. Land for a new primary school will be provided with financial contributions to assist in its completion and financial contributions based on a demonstrated need for additional school places at secondary schools to meet projected growth in pupils and mitigate the education impacts of the development;

xx. Standard telecommunication connections will be provided to link to the Stafford exchange enabled with Superfast Fibre Access Broadband.

Developer contributions will be required to provide the strategic infrastructure needed to achieve a comprehensive sustainable development at this Strategic Development Location.

Appendix i



Appendix ii

Visual Assessment

June 2013

Beacon Farm, North-East Stafford

Addendum Report to accompany Planning, Sustainability and Accessibility Case Report

Background

Lufton & Associates are working on behalf of Clarkes Farms to promote land north-east of Stafford as a location for the development of a new community (1,000 new dwellings in two phases) that would complement existing activities and improve the sustainability and accessibility of the north-eastern quadrant of the town.

In response to Stafford Borough Council's Core Strategy consultation and production of a Planning Strategy Statement and Revised Sustainability Appraisal Report Addendum (April/May 2013) Lufton & Associates produced a planning overview in support of the case to allocate land at Beacon Farm for housing (May 2013).

This brief visual assessment is an addendum to that report and is in response to **the Borough Council's observation that the land promoted at Beacon Farm is 'high' and visually 'prominent'**.

Lufton & Associates assert that the land is not visually prominent and are very strongly of the belief that a development of new housing could be sensitively incorporated into the natural landscape setting. Moreover, the allocation of Beacon Farm appears to perform much better in terms of the minimal visual intrusion into open countryside than land allocated to the North of Stafford in the Borough Council's Submission Core Strategy. No comparative analysis is offered here but it is considered that the promoters of land North of Stafford and the Borough Council have a case to answer in relation to the allocation of the land and if developed its substantial intrusion and visual prominence in open countryside.

This visual appraisal needs to be interpreted in the context of the Indicative Land-Use Masterplan produced in May 2013 and in particular the accompanying Ecological Framework measures that are proposed.

General Principles

This document reports a basic visual assessment that has been produced to illustrate the context and setting of the proposed housing allocation.

The assessment *does not* fully follow the Guidelines for Landscape and Visual Impact Assessment (second edition), published April 2002 by the Landscape Institute and Institute of Environmental Management and Assessment or the Landscape Character of Assessment, Guidance for England and Scotland, published April 2002 by the Countryside Agency and Scottish Natural Heritage. It does however adhere to the general principles of visual impact assessments that are based on these guidelines.

It has not been considered necessary at this stage to undertake a very detailed landscape and visual impact assessment and indeed it is considered that some of the techniques and their description of magnitude of impact and sensitivity of receptors used in such assessments are overly complex. They often diminish and confuse the public and the decision-makers rather than enhance the evidence. Lufton & Associates have preferred instead to focus resource on producing as much assessment material as time and resource allow and in this case have focussed on providing as much visual evidence (photographs) as possible.

The general principles that have been followed are;

- 1) the most prominent positions have been used to present visual evidence.
- 2) locations for photographs have sought positions where the public has the greatest access (eg public footpaths, public parks and junctions on the public highway).

It is recognised throughout that photographs have been taken in mid-June when on the whole trees and other vegetation exhibit dense foliage and area near to their most substantial growth and cover. Other supplementary photographs were however taken in late November 2012 which show a contrast with winter conditions. These are indicated where relevant.

Visual Assessment

Images 1, 2, and 3

Location E_394110 N_323420. Plan page 30.

Location E_394140 N_323530. Plan page 30.

Photographs 1 and 2 were taken from the highest point on Kingston Hill and photograph 3 from a slightly lower position on the entry point to Kingston Hill from Longhurst Drive.

The woodland on top of Beacon Hill is reasonably visible from Kingston Hill as are the main brick buildings of Staffordshire University. Any development of areas 1 and 2 would be almost completely if not completely obscured by buildings and prominent trees. As is clear from picture 3 no vantage point is likely to be gained of any development of areas 1 and 2 as the more prominent intervening buildings are not anyway visible.

Images 21 and 22

Location E_393290 N_324560. Plan page 30.

Photographs 21 and 22 were taken from the west side of Beaconside. They clearly illustrate the dense hedge and vegetation surrounding Beacon Barracks which combined with the flat topography mean that no vantage point can be secured of any part of areas 1 and 2. This is the case along the whole length of Beaconside from the Sandon Road junction to the Technology Park.



21



22



3



2



1

Images 4 and 5

Location E_395390 N_325230. Plan page 32.

Photographs 4 and 5 were taken from the highest point on the A518 Weston Road by the underpass between the County Showground and car park. The wooded area of Beacon Hill is the most prominent feature and the images illustrate the high ridge line that separate areas 1 and 2 from land to the north-east. In the longer term the HS2 alignment (not shown) would act as a further visual barrier obscuring any possible views from the north-east.

Images 6, 7 and 8

Location E_395330 N_325580. Plan page 32.

Photographs 6, 7 and 8 were all taken from the same position which is a junction of public footpaths at the edge of the County Showground car park. Images 7 and 8 clearly illustrate the ridge separating areas 1 and 2 from any possible views from the north north-east.

Image 25

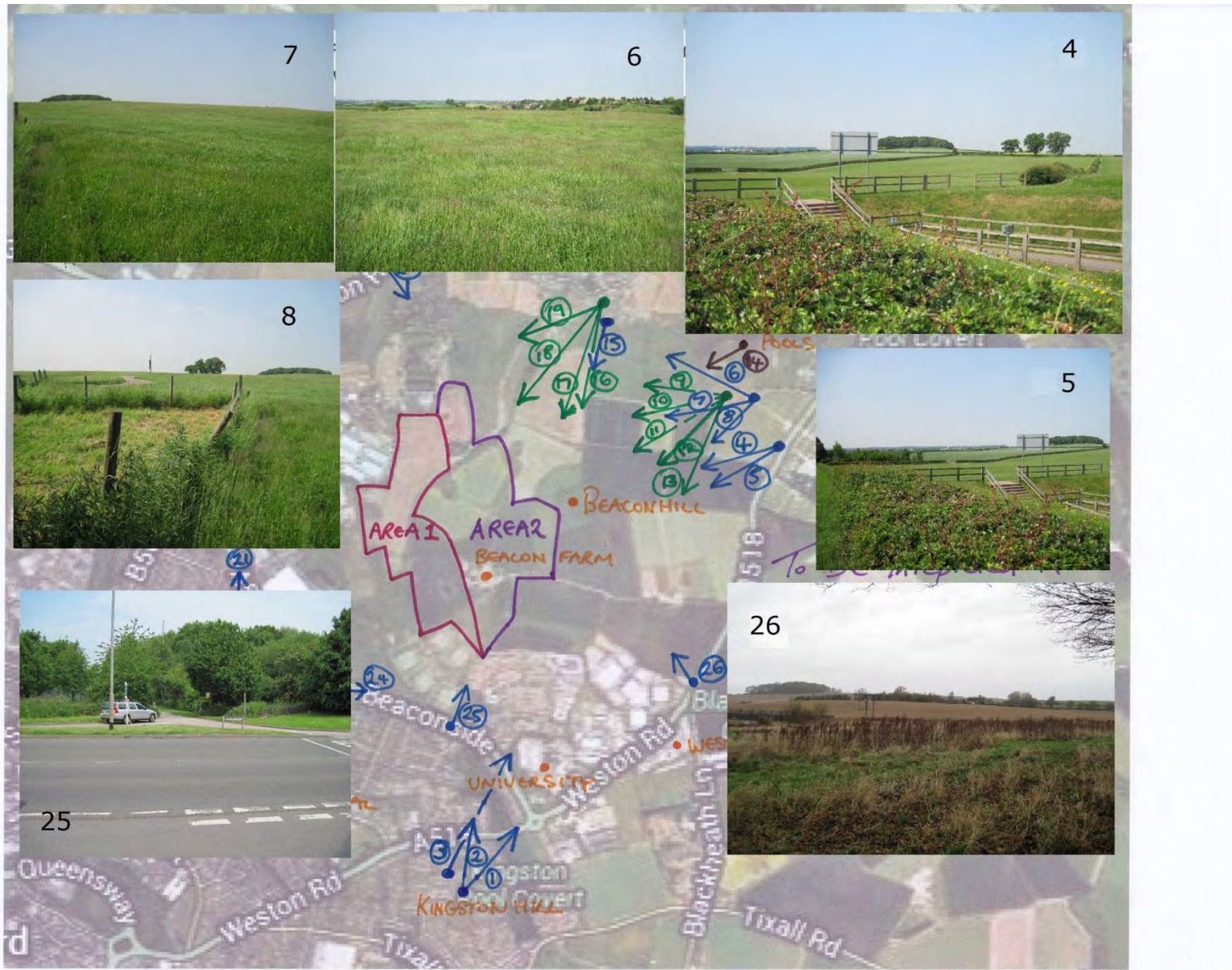
Location E_394080 N_324140. Plan page 32.

Photograph 25 shows the approach to Beacon Farm from the junction of Beaconside and Gladstone Way.

Image 26

Location E_395070 N_324330. Plan page 32.

Photograph 25 shows the view across the land allocated for employment use from the A518 Weston Road (November 2012).





Images 9,10,11,12 and 13

Location E_395390 N_325230. Plan page 33.



Photographs 9,10,11,12 and 13 were taken from the highest point between Beacon Hill and Hopton Pools (as indicated above). This point is approximately 100m east of the proposed HS2 alignment. It is unlikely any view could be gained of area 1 or 2 from this position or any intervening position between this point and Beacon Hill although glimpsed views may be attained by future HS2 passengers as they pass at 400kph depending whether HS2 is cut or elevated.

Image 14

Location E_395230 N_325800. Plan page 33.

Photograph 14 was taken from the Hopton Pools footpath the high ridge line obscures any view of areas 1 and 2.

Image 15

Location E_395230 N_325800. Plan page 33.

Photograph 15 was taken from the footpath exit to the fields from Kings Drive the high ridge line obscures any view of areas 1 and 2.



20



19



18



23



17



24



16

Images 16, 17, 18 and 19

Location E_394710 N_326000. Plan page 35.

Photographs 16, 17, 18 and 19 were all taken from the same position at the end of Cromwell Close in Hopton. From this elevated and open aspect some long distance views may be obtained of area 2 (images 18 and 19). In the longer term the HS2 alignment (not shown) would obscure any view that could be gained of areas 1 and 2.

Image 20

Location E_393750 N_326160. Plan page 35.

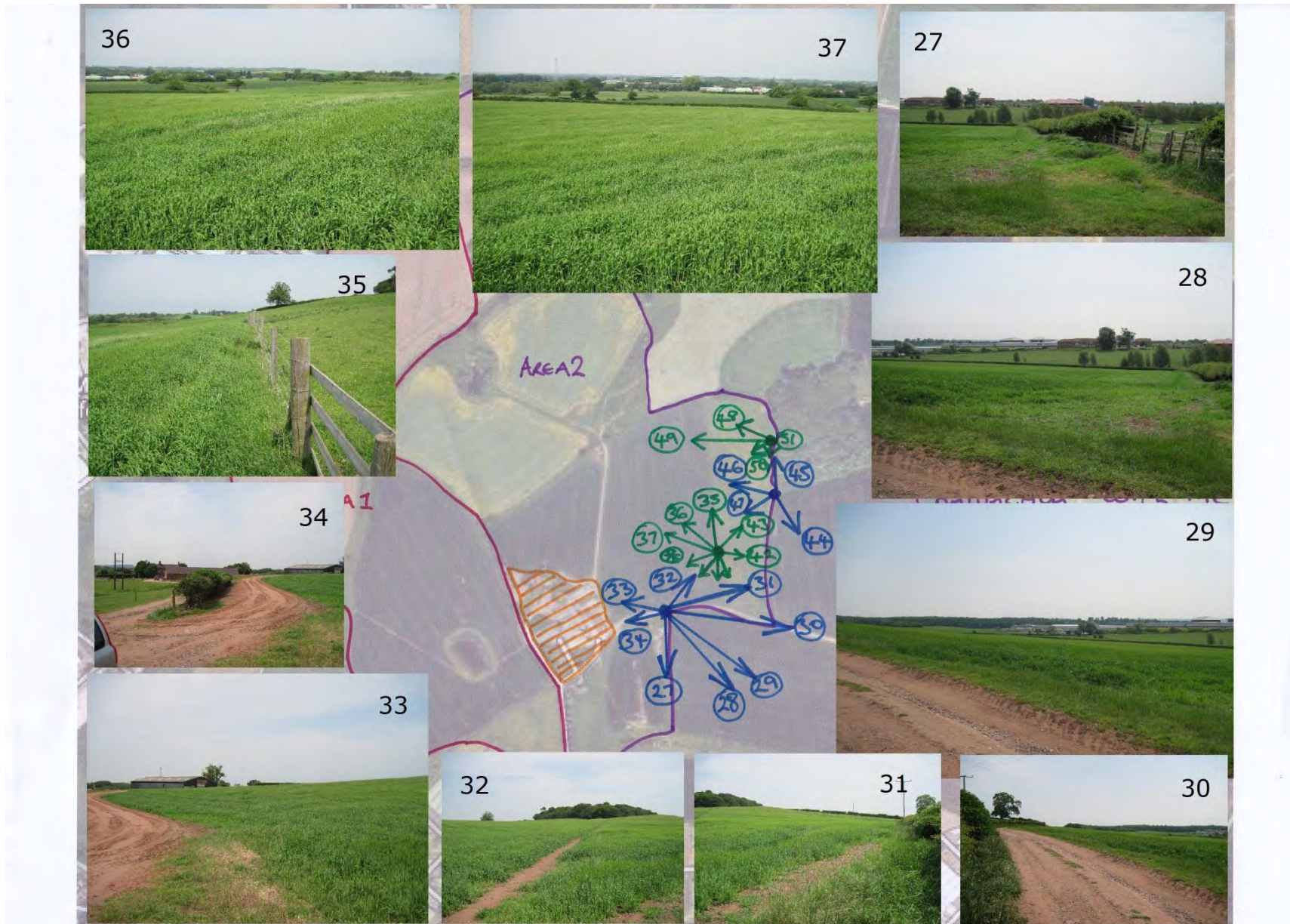
Photograph 20 was taken from the junction of Sandon Road and Hopton Lane. Topography and intervening dense trees, hedgerows and buildings do not allow for any view of areas 1 and 2 to be gained from any position along Sandon Road.

Images 23 and 24

Location E_393560 N_324340. Plan page 35.

Photographs 23 and 24 were taken from the south side of Beaconside at the junction of Beaconside and Portal Road.

In common with images 21 and 22 (page 30) they clearly illustrate the dense hedge and vegetation surrounding Beacon Barracks which combined with the flat topography and intervening buildings mean that no vantage point can be secured of any part of areas 1 and 2. This is the case along the whole length of Beaconside from the Sandon Road junction to the Technology Park.



Images 27 to 36

Location E_394330 N_324810. Plan page 37.

Photographs 27 to 36 were all taken from a point approximately 100m east of the edge of Beacon Farm farmstead on the outer boundary of area 2. The position above Beacon Farm with lower lying land to the south-west, south and south-east and rising land to the north and north-east is clear.

Images 37 to 43

Location E_394410 N_324900. Plan page 39. Image 37 on page 37 and 39.

Photographs 37 to 43 were all taken from a point approximately 200m east of the edge of Beacon Farm farmstead and 120m south-east of the footpath entry point to Beacon Hill within area 2. The location lies on the footpath at a stile between two fields. The position above Beacon Farm with lower lying land to the south-west, south and south-east and more steeply ascending land to Beacon Hill is clear.

Images 44 to 47

Location E_394490 N_324980. Plan page 39 and 40.

Photographs 44 to 47 were all taken from the point of entry of the footpath to Beacon Hill on the outer boundary of area 2. The descent to the land across areas 1 and 2 to the west is clear.

Images 48 to 51

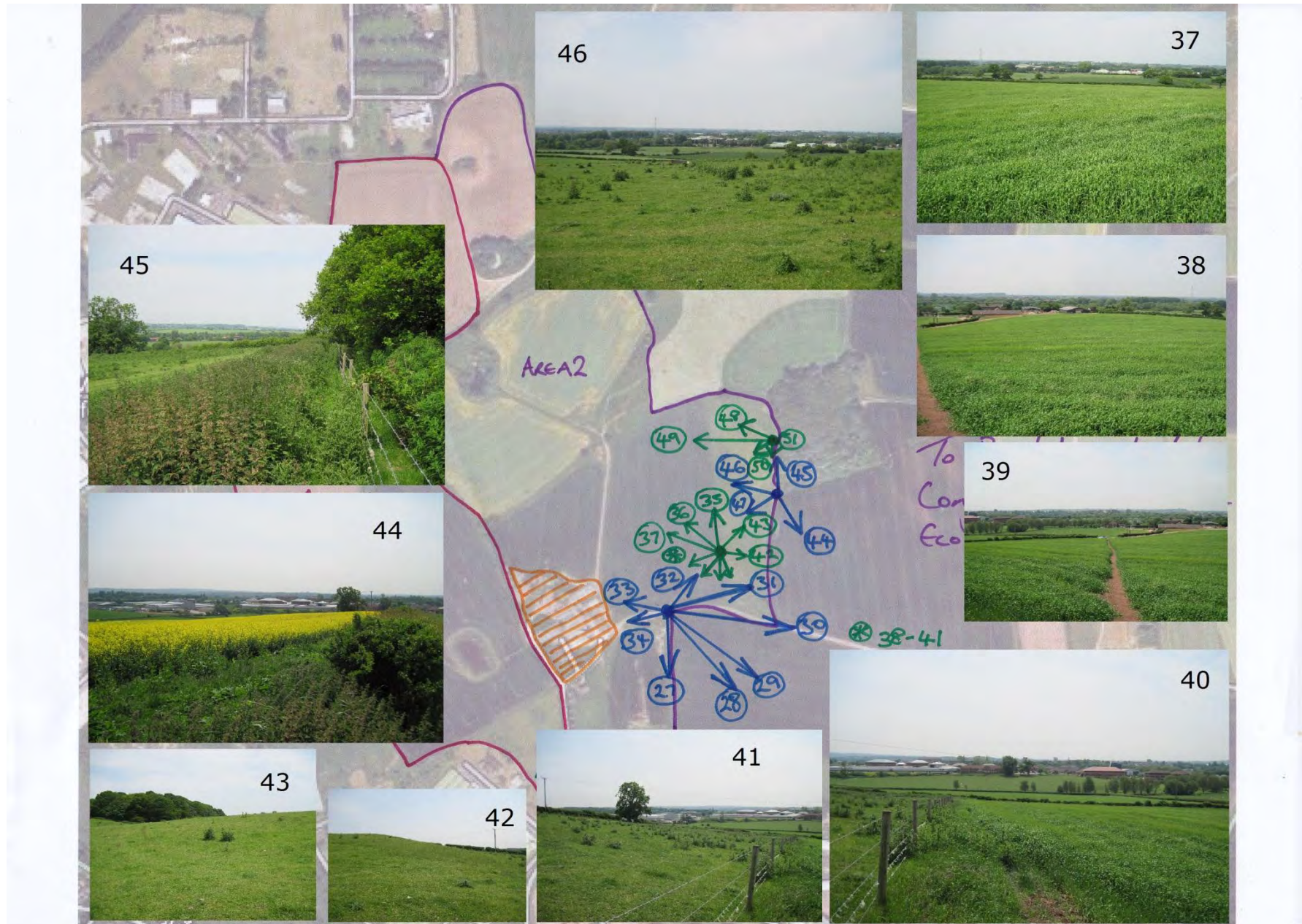
Location E_394480 N_325080. Plan page 40.

Photographs 48 to 51 were all taken from highest point on the west side of the wooded area of Beacon Hill. The descent to the land across areas 1 and 2 to the south and west is clear. In accordance with the Ecological Framework Plan (p.19) and the Indicative Land Use Masterplan (p.4) the most prominent elevated land just below Beacon Hill is not proposed for development.

Conclusions

This basic visual assessment clearly indicates the relative seclusion of Beacon Farm as a location in visual terms. The natural topography of lower lying land under Beacon Hill to the north-east and the flatter landscape to the south and west mean that any development of areas 1 and 2 would hardly intrude on the

rural scene at all. Further, with the ecological enhancements proposed Lufton & Associates are confident a very satisfactory development solution can be achieved in visual terms.

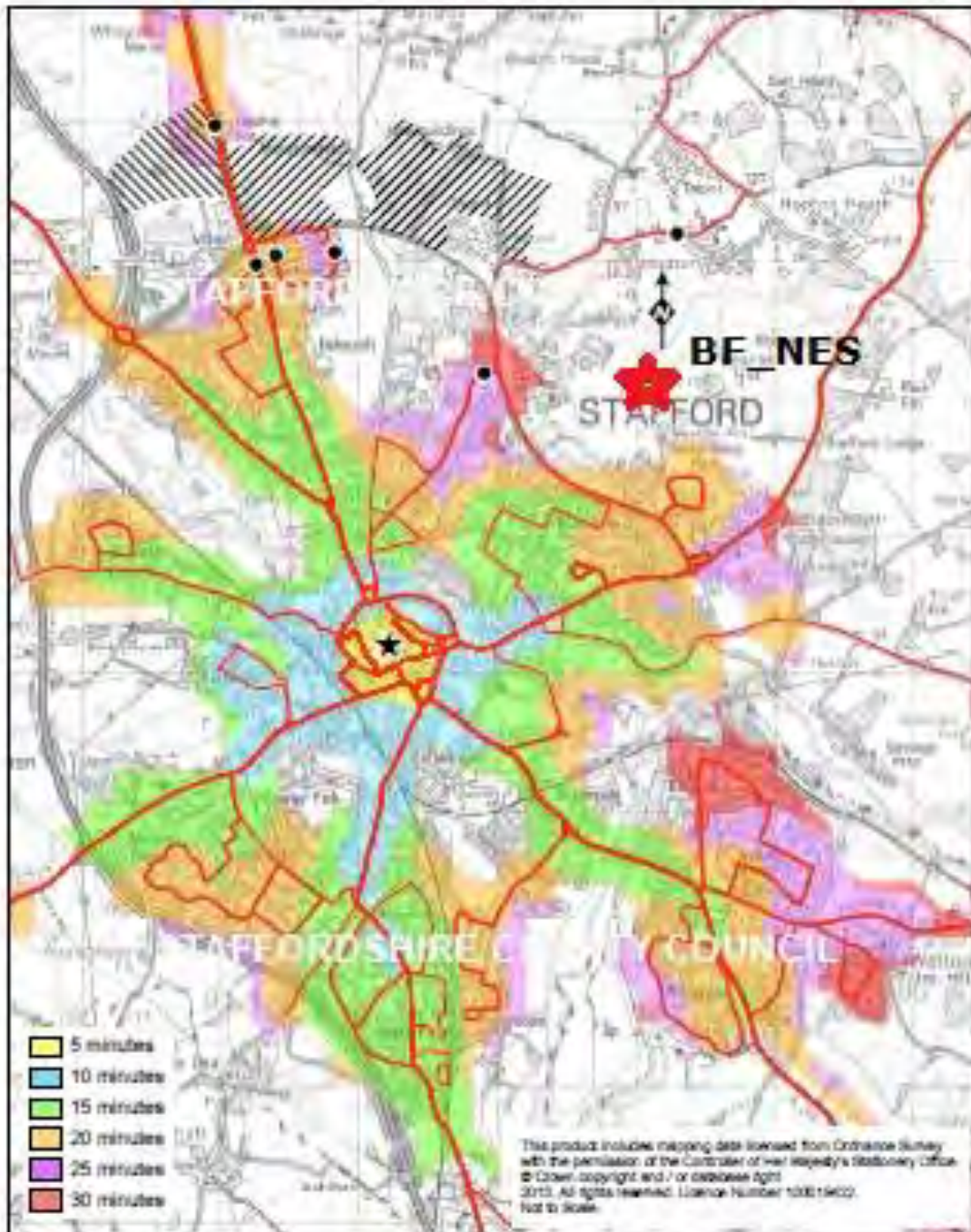




Appendix iii

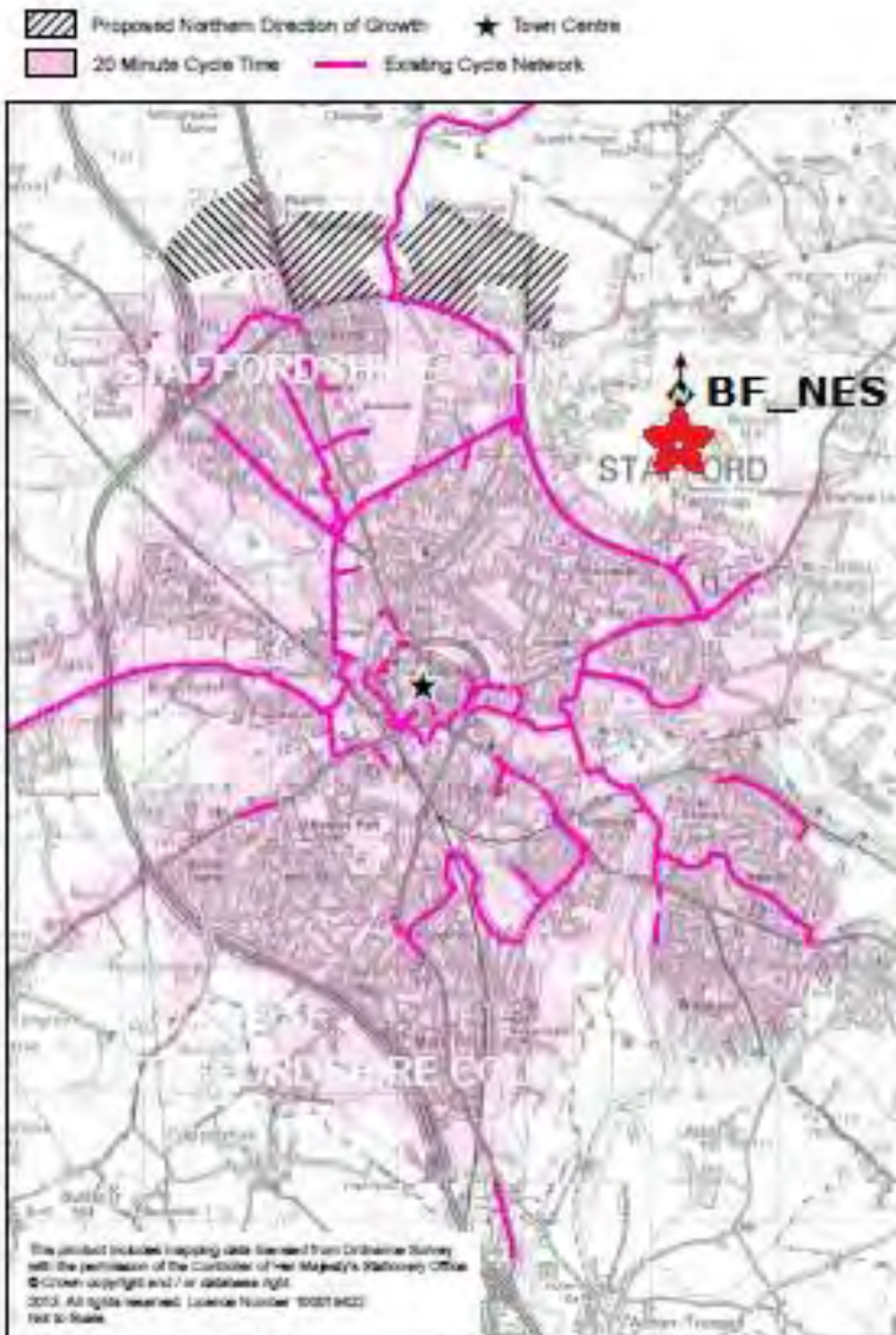
Figure 5.1 : Bus Journey Times to Stafford Town Centre
(including walking to and waiting time at bus stop)

 Proposed Northern Direction of Growth
  Bus Routes
  Bus Stops
  Town Centre



Appendix vi

Figure 5.2 : Cycle Times to Stafford Town Centre



Appendix v

Figure 5.3 : Walking Times to Stafford Town Centre

▨ Proposed Northern Direction of Growth ★ Town Centre

