

Statement to the Inspector / Examination submitted on behalf of Creswell Parish Council

We wish to highlight concerns under the following three headings: -

1. Questions outstanding of the Borough Council and of the Local Plan (as submitted)
2. The issue of new, untested evidence submitted in support of the Local Plan, which only came to light within the Evidence Database
3. The potential impact of the above – in particular of suggested new highway provision(s) to the north of Stafford.

1.

Questions outstanding of the Borough Council and of the Local Plan (as submitted):

The Borough Council recently held a Parish Forum (on 26th September 2013) to which Creswell Parish Council submitted a number of questions as detailed below; to which we appended a summary of the verbal responses received at that meeting.

These questions may not only be of interest to the Inspector but be matters that he may wish to further consider as part of his deliberations and possibly explore during the discussions to be held during the Examination process.

The questions were prepared for and subsequently approved at our September Parish Council meeting, at which time we were aware that the Borough had gone ahead and submitted the Local Plan (publication version) to the Secretary of State but prior to any indication of when the Examination might take place.

Question 1:

The Plan for Stafford Borough

Notification has recently been received of the final publication and formal submission of the above Local Plan to the Secretary of State, indicating that we now await a date for the Examination before an Independent Inspector.

Will the Borough Council please explain why this has gone forward to this final stage without the preparation, presentation and public consultation on the three **Area Master Plans** - for those multiple developments proposed for the North, East and West of Stafford town - which we were **ASSURED** would be prepared, produced and debated before the Local Plan was submitted?

Throughout the process of preparation to date and at various forums, not least the last “Planning Forum” held (in the MET at Stafford Gatehouse) for all local Parish Councils, we have been repeatedly assured, in response to questions not only from Creswell but other Parish Councils, that these (three)

Area Master Plans would be prepared, in advance of the final submission of the Local Plan. Such Master Plans would thus inform, expand and elaborate on the numerous separate discrete and often distinct development proposals in each of these three areas and – so we were told and reassured – would help provide for the effective and controlled integration of these proposals into an overall development strategy by providing clear parameters for the effective provision of the required area-wide infrastructure needs, etc. and help which would thus ensure properly coordinated and integrated delivery of the major development proposals in these three areas.

Why has this not happened?

Will any such “supporting information” now be produced and supplied to the Inspector prior to or at the Public Examination?

If so, how are Parish Councils and members of the Public to be able to comment on any such new materials in a timely and considered manner?

Response to Question 1:

There is an intention to have 3 x master plans.

These have been delayed due to lack of time to work with developers – 1 day in July 2013 so far.

Still working on the North plan, looking at evidence and viability.

Highways have produced an overall strategy for Stafford and done a viability test on N&W

A new local transport body has been set up for funding over £5m, has more devolved powers. This will deal with the Western Access Road (high score on cost/benefit) and the EDR (low score, needs more work)

There is a full highways strategy on the county council website.

The reference made above to the fact that “Highways have produced an overall strategy for Stafford ...” confirmed what until then had been only rumour and whispers about some new highway proposals and is further touched upon in the Borough’s response to Question 2 below.

It is also clear that at least one of the local landowners whose property has been identified for Employment Allocation to the north of Stafford was not informed of, nor invited to, any meeting held in July (nor of any prior equivalent meeting).

No Parish Councils were informed of this meeting, nor of any outcome(s).

Question 2:

The Plan for Stafford Borough – Highways provision

Will the Borough Council please comment on and advise Parish Councils of any new proposals being worked upon by the County Council as regards the provision of new highways and related infrastructure in and around Stafford and how such proposals might effect and impact upon the Local Plan as it currently exists.

2(a)

Is it true, specifically, that the County Highways have undertaken investigative work to explore the possibility(ies) of providing new, additional highway capacity to the north of the town – to relieve the increasing pressure upon the A513, Beaconside Road?

What is the current status of any such undertakings?

2(b)

Furthermore, having recently approved, in Outline, two major housing developments in the vicinity of Tixall Road, what plans does the County have for the actual provision of the highway and highways-related infrastructure that was “implied” within those outline proposals?

2(c)

Will the Borough Council please comment on that fact that, should ‘Phase 1’ of the EDR actually come into being, as a result of the Tixall Road developments referred to above, that, as a direct result, existing Baswich Lane will become the “de facto” and substantive EDR for the life of this current Plan (and beyond)?

Response to Question 2:

Yes investigative work undertaken.

Available on-line. (Except few, if any, knew it was even there)

Shows if no works carried out Beaconside will grind to a halt!

Possible additional route from Redhill Employment Park to Marston Lane and then a further route to Sandon road.

We can state that neither ourselves, Creswell Parish Council, nor our neighbours Marston Parish and, we have every reason to believe neither did Hopton & Coton Parish Council, know of the existence, let alone the detail of this investigative work” - which we now, post-submission of the Local Plan for Stafford Borough, **discover** has been included as Evidence to support the Plan and, specifically, development proposals to the north of Stafford.

Indeed we also know that senior County Councillors, including those representing our area, were unaware of this investigative work until late July (just before the summer break and only just prior to the Plan's submission to the Secretary of State). Furthermore, we understand that our local MP, having become aware of the existence of such undertakings, is still waiting to be officially informed of this work and to be briefed upon its contents.

For the first time, throughout the years of the preparation of this Local Plan, we hear the admission – that we, the local residents and representatives had been ‘banging the table’ with, consistently – that ***“if no works are carried out Beaconside will grind to a halt.”!***

Which is one reason we have been pressing for the Area Master Plan for our locality – so that we could begin to address the delivery issues that the Local Plan, in its submitted (and throughout all of its Consultation phases), has thrown up ... but have not been addressed by the Planners.

Furthermore, as highlighted later, the building of the “suggested” new highway, with the creation of (yet another) new junction on the A34 north of Redhill Island (serving only this new highway) brings into serious, if not terminal doubt, the future deliverability of that area of designated employment land to the immediate north of the County Council's Redhill Business Park Development, which is in private agricultural ownership.

Access to this land via the Redhill Employment Park seems highly unlikely – rendered uneconomic by potential shared infrastructure charges – and the likelihood of there being a third new junction on the A34 north, all within a few hundred metres of each other, seems equally improbable.

IF this new highway is a realistic proposition then it throws the entire dynamics of development to the north of Stafford back into the melting pot – its impact would be that significant.

A supplementary question, asked from the floor: -

Question:

Doesn't one of the HS2 routes go through this land making the route potentially unfeasible?

Response:

Possibly, no solution discussed.

Response to part 2(b) of our tabled Question 2: (re. extension of Beaconside (the “EDR”) through the recently approved Tixall Road residential developments:

Laid out in section 106 agreement – Tixall Road

Response to part 2(c) of our tabled Question 2: (re. the continuation of the undeveloped EDR, in effect making Baswich Lane the “de facto” EDR”:

SBC/SCC still committed to EDR, but Baswich Lane likely to become de facto route as cannot guarantee any work pre 2031.

This use of Baswich Lane being something we are sure has never been publicly discussed with Baswich Lane residents.

Also an admission that there is, in effect **NO** EDR (Eastern Distributor Road – inner ring road / relief road) for Stafford – within this Plan or the foreseeable future ... rendering suggestions that the short stretch of road from Weston Road to St. Thomas Lane representations (within the Local Plan documentation) as being “EDR Phase One” ridiculous!!

We then asked three further questions of the Borough Council: -

Question 3:

Provision for HGV Lorry parking in / around Stafford urban area

Will the Borough Council please comment on any plans to deal with the ever increasing problems associated with overnight, often illegal, HGV parking that not only blocks many local roads but is also having a significant environmental impact upon those areas.

Response to Question 3:

Refer to SCC – no proposals to resolve.

A senior Councillor then suggested the police should be dealing with this.

With the Local Plan encouraging expansion of the Logistics Industry in/around Stafford the complete failure – and lack of even the aspiration to – provide bespoke HGV Parking has to be a serious omission and raises viability and environmental sustainability questions of those aspects of the Plan.

We have huge problems already with overnight, inconsiderate and illegal HGV parking all over Stafford – and in the north in particular.

Surely a “Strategic Plan” should at least seek to ameliorate if not solve such problems.

Question 4:

Provision of priority Bus Lanes on major routes into town – A34 Stone Road in particular.

Buried deep within the Integrated Transport Strategy for the town is the proposal for priority bus lanes along (parts of) the A34 Stone Road. When does the Borough Council intend to undertake any form of public consultation of this, and similar, proposals – and specifically, when will those shops and business on Stone Road, adjacent to Stafford Common be informed that the on-street car parking for their customers (outside their shops and businesses) be removed to facilitate the provision of these extra, bus-only, traffic lanes?

This Transport Strategy will be used to support the Local Plan submission – will it not? – and yet no public consultation on any such proposals has yet been held. Will the Borough Council please comment and confirm or deny that these proposals (a) exist) and (b) will be taken forward and (c) in the case of the latter, advise on likely timescales.

Response to Question 4:

*Not a priority. Need public funds to become available.
Please see transport.planning@staffordshire.gov.uk*

So why is in even included in the Plan?

Is that an open and honest Transport Strategy when they ‘float’ ideas they have little or no intention of pursuing?

The A34 is the main, indeed the only, trunk road and North-South through-route for Stafford.

In the absence of a viable EDR, the only alternative is to “commute” between Junctions 13 and 14 of the M6, thereby compounding the motorway’s own problems.

Question 5:

Park & Ride

With major developments such as the SCC Redhill Business Park already substantially underway, does the Borough Council have any real intention to provide Park & Ride facilities at this or any other location of the edge of the main urban area?

Response to Question 5:

Staffordshire County Council’s Redhill Employment Park may be a suitable site but there would need to be proof of market demand.

Words of no substance, with no likelihood of it ever happening but it made for “good PR and Spin” in the Development Proposal document.

So why is in even included?

Creswell Parish Council statement to the Inspector / Examination – 7th October 2013

We raise these issues in the hope that, during the Examination, the Inspector is not taken in by such empty promises.

2.

The issue of new, untested evidence submitted in support of the Local Plan, which only came to light within the Evidence Database

It should now be apparent that from the raising of Question 2 above and from the comments made immediately thereafter, that we sought, at the meeting on the 26th September, to actually pin the Borough Council down and to get them to admit or deny the existence of highway plans none of us had yet seen.

Subsequent to submitting those five Questions, the announcement came that an Inspector had been appointed and, a few days later, dates for the actual Examination.

For the record, we received the formal notification of Submission in an email reproduced below: -

Notice of Submission of The Plan for Stafford Borough - Publication will be available for you to view between the following dates:

Start date: 20/08/13 12:00

End date: 23/08/13 15:37

The Chairman of our Parish Council attended the Civic Office on the afternoon of the 20th August and, despite contacting an Officer from their “Forward Planning Department” (who are responsible for compiling the Local Plan), the single and only document they had ‘on display’ / available was – not even the Submission copy of the Plan – but a copy of the Final Consultation draft ... which, of course we had already seen.

It was not until the full Examination Library database became available that, by diligent research, we discovered (the existence of) the SCC (County) document entitled:

The Plan for Stafford Borough
Transport Evidence to Support a Northern Direction of Growth

Item **D25** (and **D20***, associated map).

* Source document from which this Map, as “Appendix 2”, is derived / taken remains unknown.

The document / “investigative work” the existence of which the Borough Council finally admitted, on 26th September – weeks after Submission!!

A document that was “new” to most, if not all, fellow Parish Councils present that night.

Creswell Parish Council statement to the Inspector / Examination – 7th October 2013

We note, within the “Schedule of Matters & Issues for Examination”, that it makes clear and indeed emphasises that matters should all have: -

“been subject to proper procedures of community involvement and sustainability appraisal.”

Furthermore, that: -

“All evidence and material relevant to the representations should have been submitted at the consultation stage.”

We would strongly contend that the supporting evidence, prepared by the County Council – suggesting the provision of brand new highway routes around / through proposed developments to the north of Stafford – and upon which the Borough Council is likely to rely on heavily to support the deliverability of these areas for development, **has not been appropriately submitted and has not been subject to the proper procedures of Community Involvement and of Sustainability Appraisal.**

In **B4** (page 33) – “Soundness Self-Assessment Checklist (Aug.13)” – the Borough, in reference to Stafford Town North Infrastructure Requirements, cross reference Appendix D of the Plan (page 150) where it refers to: -

*“ a package of improvements **along** the A513 Beaconside.”*

We contend that, in no way, does that cover the provision of a brand new relief road to the north of the A513.

The Borough (again in **B4** page 33) refer to Document **D58** ... which is dated July **2009** ... and to Document **D57** which is dated July **2012**.

The new County proposals are in a document **D25** dated **June 2013**.

The “Revised Sustainability Appraisal Report Addendum” – is dated **April and May 2013** and dealt with two specific matters (Appraisal of Clarkes Farm, Stafford and of Sites west of M6).

The “Revised Sustainability Appraisal Report” itself, as submitted, is dated **January 2013**.

We therefore question:

“Has the Plan been POSITIVELY PREPARED ...?” when such a major piece of evidence ... which remains in a draft (“investigative”) proposal stage only ... has been added at such a late stage – and was quite obviously missing throughout ALL of the Consultation phases; when the Plan is now clearly reliant on this fresh, draft version and untested evidence that has not been subject to the proper (public) processes?

“Is the Plan JUSTIFIED? i.e. founded on robust evidence ...”

From the (late) submission of this new evidence it is quite clear that the Plan cannot be justified in its printed, submitted form (which makes no reference to any such new highway provision), but rather has insisted throughout [backed by SCC data !!] that the current A513 “can and will be able to cope”.

Finally, the admission that it cannot; and that new highway infrastructure provision – in a form and along a (choice of routes) and of varying length yet to be properly assessed – is an essential requirement.

The County Highways proposals, as yet untested by public consultation and debate, raises HUGE questions as to the definitive route, viability, affordability, deliverability, etc

Hardly “robust evidence”!

“Is the Plan EFFECTIVE? i.e. deliverable ...?” when it clearly requires the construction of brand new (undefined) highway infrastructure(s).

When even the Borough now finally, publicly admit that: -

“if no works are carried out to the A513 Beaconside, it will grind to a halt.”!

3.

The potential impact of the above: – in particular of suggested new highway provision(s) to the north of Stafford.

Conscious of reaching the word count limit for this statement, and given that these matters will almost certainly be the subject of debate at the examination, we conclude with the following brief comments: -

Any new highway provision to the North of Stafford will significantly alter the whole dynamics of the area and of the Plan’s proposals for this area: -

- Affecting the layout and flow of the A34 (the main arterial trunk road)
- Renders undeliverable the final tranche of Employment Land to the N.E of the A34 (beyond Redhill Park)
- Impacts on current proposals for (re-modelling of) Redhill Island
- Impacts on the proposed Urban Boulevard dual carriageway between HP13 and Parkside
- Impacts on the character of the Housing on HP13 and its proposed extension northwards ... having not one but now two main roads separating it from the existing Parkside community and facilities

- Completely altering the nature of the large (2,100+) residential development further along the A513 – by driving a major access (northern relief road) through the middle of the proposed site
 - Completely negating all public Consultations held to date re. this proposed development site
- Affects the private (agricultural) landowner whose property (between the two residential sites (along Marston Lane) is currently not included within any development allocation within the Plan
- Affects other proposals along the A513
- Affects the A513 itself

In effect: -

- **Calls into question the whole of the Plan’s current proposals for Stafford North.**

Creswell Parish Council trusts that these comments are found to be both relevant and will be useful to the Inspector and to the Examination process.

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