

October 2013

Plan for Stafford Borough Examination Statement

Matter 4 Stafford Town

On behalf of Taylor Wimpey (UK) Ltd and Bellway Homes Ltd

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POLICY STAFFORD 1 – STAFFORD TOWN:

Is the development strategy for Stafford Town appropriate, effective, deliverable, sustainable, fully justified and soundly based, including:

a) Housing:

- i. The overall amount, range, type, delivery and accessibility of new housing, including provision at the Strategic Development Locations and other locations, and the impact on the surrounding landscape;*
- ii. The amount, location, timing and delivery of the proposed additional provision to meet the housing requirements of the Ministry of Defence (MOD).*

b) Employment:

- i. The overall amount, type, location and delivery of new employment development;*
- ii. Proposals for the Science & Technology Park at Beaconside;*
- iii. Proposals for further development at the MOD land as a military base;*
- iv. New employment land allocations at North of Stafford and East of Stafford;*
- v. The approach to safeguarding existing employment land.*

c) Stafford Town Centre:

- i. Strengthening the role, viability and vitality of the town centre, including the extent of the Primary Shopping Area and primary/secondary frontages;*
- ii. Provision of additional comparison (34,000 sq m) and convenience (2,000 sq m) retail floorspace, and whether this is supported by the Retail Capacity Studies;*
- iii. The provision of new office and commercial development (45,000 sq m);*
- iv. Proposals for mixed-use development at Kingsmead and Riverside.*

d) Infrastructure:

- i. Is the scale, nature and timing of proposed infrastructure necessary, justified, deliverable, viable and appropriate, including the Western, Northern and Eastern Access Improvement Schemes, water, sewerage and other utilities, public transport, education, cycling/walking, green infrastructure, waste facilities, leisure, recreation and open space?*

e) Have other potential Strategic Development Locations been properly assessed, including Clarke's Farm.

1. The strategy for Stafford town has evolved over a number of years through the local plan process and through the RSS process. The strategy is based on extensive consultation over recent years and an evidence base which has considered the infrastructure needs to support the strategy as presented.
2. Whilst detailed assessments have been undertaken of the infrastructure required to support the current strategy and growth locations, it is unclear what infrastructure would be required to support alternative growth locations such as Clarke's Farm. Undertaking such assessments would result in delay to getting in place an up to date plan, which given the date of the current adopted plan is urgently needed.
3. With regards to assessing locations for development, the landowners and developers within the SDL have been in discussions with Stafford Borough Council (SBC) and Staffordshire County Council (SCC) with regards to development since the outset of the local plan process. The Council has therefore thoroughly assessed issues in relation to west of Stafford through the process. The LDF process as envisaged by Government is "front-loaded" to ensure issues are considered early in the plan preparation process and to enable plans to be put in place swiftly.

4. The SEA Directive requires that in preparing plans "reasonable alternatives" are assessed. The Directive does not require "all" reasonable alternatives to be assessed. The Council has been preparing the plan over a number of years and has considered reasonable alternatives and therefore we consider there is no need to appraise options which arise late in the plan-making process.
5. Notwithstanding the above the Council has assessed Clarke's Farm and found that it is not a reasonable alternative to Stafford West. In our view, Clarke's Farm is not a reasonable alternative to West of Stafford as:
 - it can not deliver the level of development which can be delivered at Stafford West;
 - it is not as well-related to the town centre and railway station;
 - it is not as well-related in terms of sustainable transport options;
 - it has not been assessed for its impacts on infrastructure and therefore the infrastructure required to support sustainable growth is unknown;
 - its location, beyond MOD Stafford means it is divorced from existing urban area and unlikely to integrate with existing communities and will effectively function as a free-standing development;
 - it is likely to have greater impact on the countryside given that the area to the north east of Stafford is an area of attractive, open, rolling agricultural landscape compared to land west of Stafford which is contained by the M6;
 - access to locations such as the town centre and railway station from Clarke's Farm is via the busy A518 Weston Road. The distance and quality of that route is likely to deter both cycling and walking as significant modes. It is around 3km from the current urban edge to the east of Stafford on Weston Road to the town centre and around 4km to the railway station. In contrast, access to the town centre from the western SDL can be gained via more suitable routes and with shorter journey times. The distance from the closest point of the western SDL to the town centre is 270 metres and to the railway station is around 450m. It is around 2.5km from the furthest edge of the western SDL to the town centre and to the railway station.

POLICY STAFFORD 3 – WEST OF STAFFORD

- a) *Is the Strategic Development Location at West 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 (2,200 houses), including affordable housing;*
 - ii. *The design of the proposed development, including the “neighbourhood” approach, provision of retail, education, health and other facilities, and provision of small-scale employment areas (5ha) and on-site renewable/low carbon energy solutions;*
 - iii. *The scale, nature, delivery, funding, viability and timing of proposed infrastructure requirements, including highway capacity and public transport improvements, (including Western Access Improvement Scheme) drainage works, utility and telecommunication services, education facilities, mitigation of the impact of development on Cannock Chase SAC (including SANGS), open space and green infrastructure;*
 - iv. *Impact of the proposed development on the environment, including the landscape and surrounding countryside, historic environment and heritage assets, including the setting of Stafford Castle and St Mary’s Church, nature conservation, flooding, and existing services;*
- b) *Does the infrastructure and other evidence (including transport assessment) properly assess the likely level of proposed housing 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 associated infrastructure?*
6. The west of Stafford SDL is in a highly sustainable location. It lies close to the town centre, the railway station and local services such as supermarket provision and schools. At its closest point, the site is 270 metres to the edge of the town centre and 450 metres to the railway station. It lies close to significant employment within the existing town centre and Greyfriars industrial area, along with various industrial and retail premises in the Newport Road area. It also lies close to significant employment planned in the town centre in terms of new retail development and 45,000 square metres of office accommodation. In terms of standard employment densities - Employment Densities Guide (Second Edition), HCA 2010 – the town centre provision of 36,000 square metres of retail space would be likely to generate 1,895 jobs and the office space 3,750 jobs.
7. The site has easy access to the town centre and railway station on foot and by bicycle via pedestrian/cycle routes and lightly trafficked roads. The site will also deliver a key piece of town wide infrastructure in terms of the section of the Stafford Western Access Improvement from Martin Drive to Doxey Road. There are three secondary schools – King Edward VI High School, Blessed William Howard Catholic School, Rowley Avenue, Stafford – in close proximity to the site. Two of which lie just south of Newport Road and are within 700 metres of the site
8. The trajectory at Appendix 1 sets out expected delivery across the local plan period. The trajectory assumes initial delivery of the St Modwen planning permission, and early delivery of the land allocated by the adopted Local Plan. It assumes housebuilders delivering around 65 market and affordable units per year. After an initial period, given the size of the site and the variety of locations and housing types which might be delivered, it is assumed that from around 2020/21 three house builders operate across the site. The trajectory also assumes some tail-off towards the end of the build period.
9. We support the neighbourhood approach to the development. An initial concept plan has been produced working with local stakeholders and this will form a basis for masterplanning at the next stages of the process. That concept plan is based on the provision of a predominantly residential development, with local employment opportunities provided in a neighbourhood centre, local school, and potentially as part of facilities such as a care home. The initial concept plan also provides for an element of employment on the northern side of Doxey Road and for mixed use along Doxey Road, which could also

include elements of employment. We do not consider that the Plan's existing concept plan¹ is helpful nor its status is clear. It does little to convey the vision of the kind of sustainable new neighbourhood to which all the parties aspire. We recommend deletion of the concept plan.

Change sought

Delete Stafford West Concept Plan on p55 of the Submission Plan

10. Both the Policies Map and the plan on p54 of the Submission document seek to delineate where particular uses are to be provided. We consider that location of uses across the site, such as location schools and community facilities, location of any employment provision and open spaces should be the outcome of a collaborative design approach working with local and statutory stakeholders. An initial concept plan has been prepared and subject to discussions with a range of stakeholders. Following adoption of the local plan further discussions will be held, to refine the concept plan and to add further detail as part of that ongoing process of developing a masterplan to support an application.

Change sought

Delete plan on p54 of the Submission plan. Amend Policies Map to show allocation for Strategic Development Location West of Stafford without distinguishing between location of uses.

11. The approach to employment within Policy Stafford 3 seeks new employment incorporated into housing areas. The plan is not specific as to whether "employment" simply means jobs or is referring to "employment land", ie Use Classes B1/B2/B8. Given the site's location, it is unlikely that new office/industrial/warehouse floorspace would be provided. Indeed, given the residential nature of the area any uses are likely to be limited to B1 on amenity grounds. Such an approach would limit uses to light industry given that M30 seeks to restricts office development outside the town centre.
12. Given the site's location close to the town centre and future provision of significant jobs, it is considered that Criterion iv should be amended to refer to the provision of local employment opportunities rather than specifying the provision of 5 hectares of employment land.

Change sought

Amend iv to read: *"opportunities for local employment should be incorporated into the district centre. This could take the form of a mix of local uses/facilities such as the school, retail (A1), food & drink (A3/4/5), small scale offices (A2/B1), care provision."*

Add to paragraph 7.29 "Land West of Stafford is well-located close to significant existing employment provision in and close to the town centre. The local plan also provides for significant future employment close to the site through the delivery of 36,000 square metres of new retail space and 45,000 square metres of new office in the town centre. This proposed floorspace has the potential, at typical employment densities, to accommodate 5,600 jobs. In recognition of the proximity to employment opportunities, the amount of employment provision within the SDL is expected to be limited to local opportunities within the neighbourhood centre, or along Doxey Road."

13. We set out our views on the provision of renewable energy as part of developments in relation to Matter 9.
14. Additional work has been undertaken on viability of the SDLs by the Council and its consultants Level (D51). That work involved working with Taylor Wimpey and Bellway in relation to the assumptions and discussions regarding viability.

¹ on page 55 of the Submission document

15. Levvel conclude (para. 7.8) that the SDLs *“are, fundamentally, viable in the sense that the value they are likely to generate exceeds the cost involved and will allow a competitive return to both developer and landowner.”* Levvel recognise that on the basis of current values and with the likely scale of potential burdens placed upon the SDLs, it is unlikely that they will be able to achieve the Council’s affordable housing targets in full but, even with quite substantial packages of both affordable housing and infrastructure, the sites continue to return a positive land value (para. 7.1).
16. As set out in Levvel’s July 2011 assessment (D10), for all development:
- “It is essential that any Borough wide affordable housing policy is not unduly rigid and can be applied flexibly and pragmatically allowing development to come forward whilst meeting the needs of the community.”*
17. As Levvel (para. 7.5 of DA51) identifies, the situation in Stafford is not unique. In many local authority areas there are competing requirements for infrastructure funding from developments and in the current market, not all those infrastructure requirements can be delivered. However, that does not mean that development in sustainable locations should not come forward and it does not mean that other housing needs should go unmet. What is required is that development continues to come forward and assist in the delivery of infrastructure. In terms of the Western SDL, the Council has identified as a matter of priority that the scheme should deliver part of the Stafford Western Access Improvement in the form of a link from to Martin Drive to Doxey Road. That link is a critical piece of transport infrastructure which will not only support the delivery of the Western SDL, but also regeneration of the town centre and facilitate the delivery of the planning strategy as a whole.
18. DA51 also points to other factors which are likely to assist in enabling the SDLs to support community infrastructure. The scale and nature of the SDLs are such that the SDLs are likely to experience an improvement in values relative to the rest of the market (para. 7.1 of DA51). There is the potential that some grant will be available to support the provision of additional affordable homes (para. 7.6 of DA51) given that in practice the grant that has been available through the Homes and Communities Agency’s main Affordable Homes Programme has been directed toward sites similar to the Stafford SDLs.
19. Taylor Wimpey and Bellway have been working with Stafford Borough Council for a number of years on the approach to the Western SDL. Appendix 2 includes a statement of common ground on delivery between Taylor Wimpey, Lord Stafford, Bellway and St Gobain.
20. In order to progress delivery through the planning system a Major Projects Team has been established, working with the HCA’s Advisory Team on Large Applications (ATLAS). The approach being taken follows the ATLAS model approach and establishes a series of working structures and a case officer has already been appointed. The structures established includes a Project Steering Group comprising Stafford Borough Council, Staffordshire County Council and representatives of the landowners and developers – Taylor Wimpey, Bellway, St Modwen, Lord Stafford’s estate, St Gobain. The Project Steering Group – oversees the management of the project. Beneath the Steering Group sit a number of working groups tasked with resolving key issues in a collaborative manner. Those working groups which have been primarily involved to date have been:
- Transport;
 - Environment – covering both natural and historic environment issues; and
 - Viability.
21. The working groups involve the relevant stakeholders including representatives from the Environment Agency, English Heritage, Natural England and representative from various departments of both the County and Borough Council. The outputs from the working groups has been additional reports to supplement the local plan evidence base and agreement with regards to key principles for the initial concept plan and for taking forward to the next stages of developing the scheme. Following adoption of the local plan the working groups will take forward more detailed work in order to enable application(s) to come forward. The working groups will also provide a forum for scoping planning application

documentation and the Environmental Impact Assessment and considering further the technical work as that progresses.

22. Via a series of meetings and workshops the Environment Working Group has established a set of key principles for the approach to Green Infrastructure. Those principles seek to deliver multi-functional green spaces, based on utilising existing assets to deliver a high quality new neighbourhood. The principles also seek to ensure that green infrastructure is connected across the site and connects with other nearby green spaces such as Duddas Wood and Millennium Green. Such an approach is intended to maximise the attractiveness and usability of that green infrastructure by offering residents of the development, and residents of the existing area, access to significant, high quality green spaces and so offering alternatives to existing spaces such as Cannock Chase. The approach to Green Infrastructure is also closely linked to the issue of the setting of Stafford Castle.
23. The site of Stafford Castle is a Scheduled Monument. A considerable amount of work has been undertaken by the project team on issues in relation to the setting of Stafford Castle. In 1991 the Archaeology Section of Stafford Borough Council (SBC) undertook an assessment of five landholdings that were being considered for allocation for residential and industrial development within the Stafford Borough Local Plan 2001 (Local Plan Housing and Industrial Allocation: An Archaeological Assessment Archaeology Section Report 1, SBC 1991).
24. The area west of Stafford was described within that report as Area 1. A zone of maximum archaeological constraint was defined in order to protect not only the physical remains of Stafford Castle, but also its setting and surrounding contemporary landscape. EDP undertook further assessment of the historic environment constraints in 2008.
25. During discussion within the Environment Working Group, English Heritage advised of new guidance on assessing setting of archaeological assets - *The setting of heritage assets: English Heritage guidance* (2011). It was agreed that further work would be commissioned. EDP undertook further assessment of issues related to the setting of Stafford Castle - *Burleyfields, Stafford, Historic Environment Assessment*, EDP, September 2013. That work has been submitted to Stafford Borough Council to supplement the local plan evidence base. Through the process of compiling additional evidence on the setting of the Castle, a set of agreed principles have been developed between the development interests, SBC and English Heritage.
26. Staffordshire County Council has undertaken a strategic assessment *Transport Evidence to Support a Western Direction of Growth* (D26). That concludes that construction of “*Section C of the Western Access Route between Martin Drive, Castlefields, and Doxey Road to provide a second means of access to the Castlefields and Burleyfields, together with an agreed package of sustainable transport Interventions*” enables the delivery of the full urban extension (final paragraph of the conclusions).
27. Appendix D (which is proposed to be modified by M117) identifies infrastructure “*requirements*” under each strategic scheme. In relation to Stafford West the whole of the Stafford Western Access (SWA) is listed under the heading critical transport infrastructure. The Stafford Western Access is required to facilitate the growth strategy as a whole, rather than being a requirement related to Stafford West – see, for example, Executive Summary to the Major Business Case (E32) which identifies that the SWA and complementary sustainable transport measures will form part of a wider sustainable integrated transport strategy for Stafford for the period up to 2026 and will assist in the delivery of the “*Stafford growth agenda.*” It is also worth noting that the proposal for the SWA pre-dates the strategic allocation and its purpose is to unlock wider benefits rather than simply facilitate development of the western SDL. Whilst M117 makes clear that Section C is to be funded by the western SDL and that other funding will deliver Sections A and B its inclusion in this part of the Appendix implies that it is necessary to deliver growth in the west, which is not supported by D26.

Change sought

In Appendix D amend Critical transport infrastructure requirements to refer only to Section C of the Stafford Western Access from Martin Drive to Doxey Road.

28. Policy Stafford 3 does not place any restrictions on growth, although paragraph 7.31 states that infrastructure requirements are listed in Policy Stafford 3 and further details are provided in Appendix D to the local plan. Appendix D states that that 400 homes can be delivered ahead of the need for the link from Martin Drive to Doxey Road. The recognition that development can be delivered ahead of Section C of the SWA is welcomed. However, we do not think the reference in Appendix D is particularly helpful. D26 assesses the impact of an 400 additional homes. It has not assessed whether a higher level of growth might be accommodated. We consider that the plan does not need to identify the trigger for delivery of Section C. A site specific transport assessment through the development management process will determine the impacts arising from development and hence the appropriate timing for delivery taking into account the location of early phases of development, the package of sustainable transport measures proposed, and the timing of the delivery of other elements of the scheme.

Change sought

In Appendix D delete *“400 homes (significantly higher than 5 year allocation) can be developed prior to completion of section 2 from Doxey Road to Martin Drive.”*

29. Policy Stafford 3 xiii identifies improvements as required to A518 Newport Road and its roundabout. D26 does not identify any works required to the A518 Newport Road and its roundabout. Indeed it states that delivery of the Stafford Western Access will *“minimise the number of likely congested links and junctions particularly along Newport Road, making Stafford an easier and safer place to access.”* (p49). The evidence base does not support improvements to Newport Road. A site specific transport assessment through the development management process will determine the impacts arising from development and hence whether any works are required to Newport Road.

Change sought

In Policy Stafford 3 xiii delete *“and improvements to transport capacity along the A518 Newport Road...its roundabout;”*

Other issues

30. M39 proposes, in response to representations by the EA, to amend Policy Stafford 3 criteria vii under the Environment heading to read as follows:

*‘A comprehensive drainage and flood management scheme will be delivered to enable development of the Strategic Development Location which will include measures to alleviate flooding **downstream and improve** surface water management on Doxey Brook and tributaries to the River Sow;’*

31. M39 does not overcome Taylor Wimpey and Bellway’s original representations in relation to the wording. The NPPF requires that development itself should not be at significant risk of flooding and that flood risk elsewhere should not be increased. The policy appears to seek measures to address off-site, existing flood risk issues. The NPPF requires that flood risk should not be increased elsewhere and *that “where possible”* overall flood risk should be reduced. Measures on site will be introduced which will seek to reduce flood risk overall, but we consider it is unreasonable for the policy to require that measures are introduced which will reduce these existing flood risk issues which are not related to the development. We consider that there is no need to include reference to this issue in policy as it is already governed by the NPPF.

Change sought

Either delete vii or amend to read *“drainage and flood management measures will be implemented to ensure that the development is not at significant risk from flooding and that risk elsewhere is increased. Sustainable Urban Drainage features should be designed and integrated as part of the network of multi-functional green infrastructure;”*

32. Subject to the changes requested in this statement, the development west of Stafford is shown to be deliverable, viable and to represent sustainable development.

Appendix 1: Stafford West Delivery Trajectory

Area	13/14	14/15	15/16	16/17	17/18	18/19	19/20	20/21	21/22	22/23	23/24	24/25	25/26	27/28	28/29	29/30	30/31	Total
St Modwen		40	40															80
LP Allocation		25	65	65	15													170
Draft allocation			25	65	115	130	130	180	180	180	180	180	180	130	130	95	50	1950
																	Total	2200

Assumptions

St Modwen land start on site 1st half 2014; 1st completions 2014/15

Bellway allocation (HP9): application late 2013/early 2014; start on site mid 2014; 1st completions late 2014/early 2015

SDL allocation: LP adopted early 2014; application(s) end 2014; start on site mid 2015; 1st completions early 2016

Based on each developer completing c65 units per year (including affordable)

From 2020/21 3 developers operating across the draft allocation

