

# 10. MOVEMENT AND TRANSPORTATION

## 10.1 AIMS AND OBJECTIVES

**Objection Nos:** 0554/26 CPRE; 0929/01 D Baxendall; 0942/04-05 SCC (Highways); 0946/27 A G Simmons; 1429/15 DOE; 1493/02 H J A Beckett; 1498/83 Stafford FOE; 2018/03 Berkswich PC; EN0387/43 Barratt West Midlands Limited; EN1489/17 DLA - MOD.

### **The Objections**

- Need to reduce the need to travel.
- Need to promote greater accessibility.
- Need to consider alternatives to road construction.
- Need to give more consideration to the bicycle.
- Need to have regard to the Transport Policy Review for Stafford.
- Need to encourage park and ride facilities.
- Need to acknowledge that development provide an impetus for the provision of services and facilities.

### **Conclusions**

10.1.1 The Plan was placed on deposit before the publication of the revised version of PPG13. Nevertheless, as I see it, the aims and objectives of the Plan are not wholly consistent with current national planning guidance. In particular, there is no mention of the aim to reduce growth in the length and number of motorised journeys.

10.1.2 In the Suggested Changes it is proposed to add "*to take account of the accessibility of land uses*" to purpose (f) of the Plan as set out in the Introductory Chapter. It seems to me that this recognises the distinction between mobility and accessibility and, as such, meets the concern expressed by **A G Simmons**, **Stafford FOE** and **Berkswich PC** in this respect.

10.1.3 The Suggested Changes also include a re-draft of the policy objectives of the Movement and Transportation Chapter, together with additional supporting text. To my mind, these alterations, the theme of which is reflected in related amendments to other parts of the Plan, help bring the Plan more into line with national guidance. I regard them as being more conducive to a sustainable development strategy. The Council accept that there is merit in incorporating a further modification to make reference to local centres as well as town centres as **A G Simmons** and **Stafford FOE** suggest. I think this is sensible.

10.1.4 As I see it, the amended list of aims and policy objectives provides a reasonable framework for the consideration of alternatives to road construction and for the provision of other modes of transports, such as cycle facilities. I do not consider that the aims of the Plan need to be strengthened further in either of these respects.

10.1.5 I have read that the County Council's Transport Policy Review, which was in its early stages when the Plan was placed on deposit, has been since been completed and has resulted in the production of a Transport Strategy for Stafford. I am mindful that the Strategy has been developed in the wake of the guidance in PPG13 and it appears to me allow for a more integrated approach towards transportation in the town. However, I am concerned about the additional text which **SCC (Highways)** wish to see included in the Plan.

10.1.6 While a good number of the measures seek to increase the attractiveness of alternative modes of transport to the car, I find what are described as "policies and proposals" are no more than aims. In my view, they add little to what is already contained in the Plan and the Suggested Changes. The only specific proposals concern new roads, two of which, identified as "major schemes", namely the Southern Bypass and the Town Centre Western Bypass, are not included in the approved Structure Plan. While the latter is made up from three of the road proposals in the Plan, which I consider at 10.13, they are not presented in this manner. In my view it would not be appropriate to endorse these schemes, which have not been the subject of public consultation, in the Plan. If it is intended to bring them forward as major schemes, this should be done as part of the review of the Structure Plan.

10.1.7 As regards park and ride facilities, I accept that such provision could well help to reduce journeys by car and PPG13 makes specific reference to this type of facility. I am not satisfied however that there is a compelling need to make the provision of park and ride or interchange schemes an objective in its own right as **Barratt West Midlands Limited** propose. In my view such measures are encompassed, albeit implicitly, by the amended objectives which seek to make more effective use of road space, manage traffic demand and promote public transport.

10.1.8 I acknowledge that development can provide an impetus for the provision of services and facilities as **DLA - MOD** submit, but I see nothing untoward in the approach advocated by the Council, namely linking the location of the *majority* of new development to existing facilities. To my mind, this does not preclude the consideration of other locations on their merits, one of which could be the propensity to encourage the creation of additional services or facilities.

## **Recommendation**

10.1.9 *I recommend that the Plan be modified by:*

- i. the incorporation of additional supporting text under the heading "Context: Aims, Objectives, Responsibilities, Resources" in accordance with the Suggested Changes, subject to the inclusion of a reference to local centres as well as town centres;*
- ii. the deletion of the policy objectives and the substitution therefor by amended objectives under the heading "Aims and Policy Objectives", in accordance with the Suggested Changes.*

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## 10.2 POLICY M1 - MAINTENANCE AND EXPANSION OF PUBLIC TRANSPORT

**Objection Nos:** 0946/25 A G Simmons; 1429/14 DOE; 1498/84 Stafford FOE.

### **The Objections**

- Need for greater clarity.
- Need to refer to integrated services.

### **Conclusions**

10.2.1 I concur with **DOE's** view that the content of this policy appears as an expression of support rather than a clear land use policy. In my view the proposal to transfer the policy to the supporting text, (incorporating the additional item put forward by **A G Simmons** and **Stafford FOE**) represents a satisfactory solution.

### **Recommendation**

10.2.2 *I recommend that the Plan be modified by the deletion of Policy M1 and the substitution therefor by additional supporting text, in accordance with the Suggested Changes.*

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## 10.3 POLICY M2 - ENCOURAGING PUBLIC TRANSPORT USE

**Objection Nos:** 0386/25 The Chebsey Estate Limited; 1429/13 DOE.

### **The Objections**

- Need for greater clarity.
- Need for greater compatibility with Government policy.

### **Conclusions**

10.3.1 This policy contains no specific proposal, nor are criteria against which proposals can be assessed set out. While I take no issue with the content of the policy, I consider it reads more as a statement of intent. In my view it would be more appropriate to include it as supporting text.

10.3.2 It may be that most of the sites allocated in the Plan are capable of being served by public transport as the Council say. Nonetheless, as PPG13 identifies development closely related to public transport networks as a specific item on the checklist of issues appertaining to encouraging the use of public transport, I commend the addition to the criteria suggested by **The Chebsey Estate Limited**.

### **Recommendation**

10.3.3 *I recommend that the Plan be modified by the deletion of Policy M2 and the incorporation of its contents into the supporting text but with the addition of a further clause:*

(e) *locating development so that it is closely related to public transport networks.*

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**10.4 PEDESTRIANS, THE PEDESTRIAN ENVIRONMENT AND TRAFFIC CALMING**  
**POLICY M4 - TRAFFIC CALMING**  
**POLICY M5 - TRAFFIC CALMING, SUPPLEMENTARY GUIDANCE**  
**POLICY M6 - DIVERSION OF NON-ESSENTIAL TRAFFIC**

**Objection Nos:** 0198/03-05 Ramblers Association; 0945/04 Castle Church PC; 0946/21-23 A G Simmons; 1429/10-11 DOE; 1498/86-88 Stafford FOE; LO50/01 Cyclists Touring Club.

**The Objections**

- Need to strengthen the means by which conditions for pedestrians are to be improved.
- Need to provide for people with mobility difficulties.
- Need to add more clarity to item (c) of Policy M4.
- Need for a policy containing accessibility criteria.
- Need to establish and implement a traffic free pedestrian network.
- Lack of clarity in Policies M5 and M6.
- Need for a policy setting out site specific requirements.
- Need to refer to cycle exemptions in traffic calming measures.

**Conclusions**

10.4.1 In response to these objections, extensive amendments to Policy M4, and the supporting text, together with the deletion of Policies M5 and M6, the content of which is to become supporting text, are proposed in the Suggested Changes. A new policy, entitled "Site Specific Proposals", incorporating the accessibility criteria set out in the text of the Plan is also put forward.

10.4.2 In my view the suggested amendments go a long way towards meeting the objections. I share DOE's concern that Policies M5 and M6 read more as statements of intent; the transfer of their content to the supporting text is more appropriate. In response to the Department's comments on the Suggested Changes, the Council agree that details of facilities could be specified. I support such a measure; to my mind, it would help place the content of this part of the Plan into sharper focus.

10.4.3 While I heard that the changes go some way towards meeting the **Ramblers Association's** objection, concern remains that a clear commitment to the establishment of a traffic free pedestrian network in urban areas is absent from the Plan.

10.4.4 It seems to me that the gist of the additional text suggested by the **Ramblers Association** is included in the Council's amendments. I appreciate that the phrase "*a high priority*" is not included, but I regard the Council's wording as a positive statement of intent nonetheless. I am not satisfied that the text needs to be strengthened further. While the **Ramblers Association** put forward a separate policy, at the inquiry it was conceded that what was being sought was more of a statement of intent and would probably be more appropriate as supporting text. In the absence of a set of site specific proposals, I find the Council's approach represents a satisfactory means of facilitating pedestrian movement.

10.4.5 **A G Simmons** and **Stafford FOE** submit that in general the changes satisfy their objections. The Council acknowledge an editing error erroneously mislocates an amendment to the text. I also agree with the objectors' view that there is an anomaly whereby under the suggested change to Policy M5, part of the supporting text is to be retained, whereas under the change to M6, it is to be deleted. I consider this needs to be rectified. The Council accept the criticism of the phrase "*mobility problems*"; in my opinion, "*mobility difficulties*" is more suitable. I agree that it would be better if a timescale for the production of the guidelines concerning the design and implementation of schemes was stated. However, while this is something the Council may wish to give further thought to, I do not consider the absence of this information unacceptably impairs the efficacy of the Plan.

10.4.6 There would be much merit in specifying locations where traffic calming measures are to be implemented, but as this matter is linked to the broader question of a transportation strategy for Stafford, I appreciate that this may be somewhat premature. Thus, while there is no commitment to a scheme at Newport Road, as **Castle Church PC** advocate, my view is that the ambit of Policy M4 in its amended form would be sufficiently broad to encompass such a scheme if the need materialised. While the amended Policy M4 refers to improving conditions for cyclists, my view is that the **Cyclists Touring Club's** concern about the need to ensure that the actual calming measures are not detrimental to cyclists is well founded. The Council indicate they have no objection to incorporating a reference to this in the supporting text, a measure which I commend.

10.4.7 Neither the wording of the altered Policy M4, nor the proposed new policy have been commented upon, but I am concerned that both include the phrase "*the Borough Council will seek*". To my mind, this tends to negate part of the benefit of the changes put forward as it makes the policies appear more as statements of intent. I consider this ought to be rectified.

## **Recommendation**

10.4.8 *I recommend that the Plan be modified by the amendment to Policy M4, the deletion of Policies M5 and M6 and the alterations and additions to the text, in accordance with the Suggested Changes, BUT SUBJECT TO:*

- i. *the deletion of the phrase "The Borough Council will seek the introduction of traffic calming measures" from the suggested amendment to Policy M4 and the substitution therefor by "Traffic calming measures will be introduced";*
- ii. *the deletion of the phrase "The Borough Council will seek where appropriate the incorporation of measures for" from the suggested new policy "Site Specific Proposals" and the insertion of the words "by incorporating where appropriate" at the end of the first paragraph;*
- iii. *in amendment 4 under Policy M4 the replacement of "RH column" by "LH column";*
- v. *in paragraph (b) of the supporting text to replace Policy M5, the replacement of "mobility problems" by "mobility difficulties";*
- vi. *the incorporation of additional supporting text referring to the need to incorporate adequate provision for cyclists in traffic calming measures.*

#### **10.5 POLICY M7 - CYCLE NETWORKS**

**Objection Nos:** 0929/02 D Baxendall; EN0948/70 A G Simmons; 1407/01 E L Fuller; EN1498/90 Stafford FOE; 1778/01 J Rogers; 1779A/20 Tarmac Midlands Housing Division; LO50/02-3 Cyclists Touring Club.

#### **The Objections**

- Need to identify cycle routes.
- Absence of proposals to cater for cyclists.
- Need for a cycle network.
- Need to make existing roads safer for cyclists.
- Need to refer to cycle parking requirements.
- Unreasonable to require developers to provide cycle network.
- Need to restore access for cyclists in Stafford town centre.

#### **Conclusions**

10.5.1 As I see it, there is a fundamental difficulty with this policy in that, as highlighted by **A G Simmons** and **Stafford FOE**, the Plan does not include proposals for a network of cycle routes. While the policy refers to existing routes and facilities, these are not identified either. The absence of such information would make it difficult to ascertain how development schemes relate to such a network. In my view this renders the first paragraph of the policy otiose.

10.5.2 The Council do not challenge the benefits of making more provision for cyclists described by **D Baxendall**. Indeed, it seems to me that the incorporation into the Plan of firm proposals for a cycle network would complement the measures directed at cyclists. However, as it does not appear that the Council are yet in a position to identify a practical framework, I consider it would be premature to require such provision in the Plan.

10.5.3 As it is likely that the existing road system will continue to form a significant part of the cycle network, it would be reasonable to refer to the desirability of making roads safer as the **Cyclists Touring Club** suggest. I consider that amended text on the lines of that suggested by this objector would be a useful addition. Given the importance the Plan attaches to provision for cyclists, I find the Council's reluctance to contemplate incorporating cycle parking standards into it somewhat surprising, although clause (b) of the policy does refer to the provision of secure cycle parking facilities where appropriate. In my view this is a matter which merits further consideration, although I am mindful that no detailed suggestions are made by the objector.

10.5.4 In my view the requirement to seek the provision of secure cycle parking places in appropriate cases contained in clause (b) is consistent with the advice in paragraph 4.17 of PPG13. I see nothing untoward in this. However, while I accept the need to have regard to cycle routes and provision for cyclists in development schemes, my opinion is that to require developers to extend the cycle network goes beyond the bounds of reasonableness; in all probability such a measure would not be directly related to the development proposed.

10.5.5 While the Council contend it is not intended to regard development proposals as an opportunity to secure the provision of a cycle network, I do not consider this is readily apparent from the wording of the Policy. In my view, neither the amendment to clause (b) in the Suggested Changes, nor the Council's subsequent suggestion offer significant assistance in this respect. On the other hand, I find the comments in paragraph 2.3 of PLI 316 offer a more reasonable approach. I think the incorporation of additional text on these lines would provide helpful clarification.

10.5.6 The objection by **J Rogers** concerns the prohibition of cyclists from the pedestrian area in the town centre rather than a particular element of the Plan. I accept that this measure could be seen to be in conflict with the general encouragement given to provision for cyclists. Nevertheless, it seems to me that this particular issue is a matter for the local discretion of the Council; I am not satisfied that it warrants any consequential change to the Plan.

## **Recommendation**

10.5.7 *I recommend that the Plan be modified by:*

- i. the deletion of the first paragraph of Policy M7 and the words "the extension of that network and" from clause (b);*
- ii. the incorporation of additional supporting text referring to the desirability of making existing roads safer for cyclists;*
- iii. the incorporation of additional supporting text on the lines of that set out in paragraph 2.3 of PLI 316.*

**AND THAT**

*Consideration be given to incorporating cycle parking standards into the Plan.*

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## **10.6 POLICY M8 - PROVISION FOR PEOPLE WITH SPECIAL MOVEMENT AND TRAVEL NEEDS**

**Objection No:** 1779A/21 Tarmac Midlands Housing Division.

### **The Objection**

- The policy replicates matters covered by the Building Regulations.

### **Conclusions**

10.6.1 In the Suggested Changes this Policy is proposed to be deleted. Two new policies, the first entitled "Public Transport: Access for the Disabled" and the second, "Traffic Management and the Disabled", are introduced in its place.

10.6.2 Contrary to the Council's view, I consider the objection is well founded. It may be that Policy M8 seeks to highlight rather than usurp or impose separate legal requirements, but I see no need for this essentially 'informative' policy. However, as PPG1 advises that development plan policies can seek to ensure that consideration is given to the provision of adequate access for disabled people, I find the new policies satisfactory.

### **Recommendation**

10.6.3 *I recommend that the Plan be modified by the deletion of Policy M8 and the insertion of the new policies entitled "Public Transport: Access for the Disabled" and "Traffic Management and the Disabled", in accordance with the Suggested Changes.*

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## **10.7 POLICY M9 - ROAD PROPOSALS**

**Objection Nos:** 0309/03 Cannock Chase District Council; 0407/27-37 R Oldacre; 0942/08 SCC (Highways); 0946/09-13 A G Simmons; 1429/09 DOE; 1498/96-99 & 1499/01 Stafford FOE; 1783/03 Joint Supervisors of Sir Charles Wolseley's Individual Voluntary Arrangement; 2018/04 & /07 Berkswich PC.

### **The Objections**

- Failure to refer to the Rugeley Eastern Bypass.
- Inappropriate reference to non-major schemes.
- Lack of clarity regarding likelihood of schemes being implemented.
- Absence of identification of detailed routes of local roads identified in the Structure Plan.
- The policy is too limited in scope.
- Non-strategic proposals should not be included in the Plan.

- All road schemes should be cancelled.

## Conclusions

10.7.1 In response to the objections by **Cannock Chase District Council** and the **Joint Supervisors of Sir Charles Wolseley's Individual Voluntary Arrangement**, in the Suggested Changes, the Rugeley Eastern Bypass is added to the list of protected schemes. A related amendment to the Proposals Map is also proposed. Contrary to the view expressed by **A G Simmons** and **Stafford FOE**, as this project is included in the approved Structure Plan, albeit described therein as the "Rugeley/Armitage Bypass", I am satisfied that its addition to the Plan is appropriate.

10.7.2 **SCC (Highways)**' objection concerning non-major schemes is not responded to in the Suggested Changes, but the Council now concedes that the supporting text ought to be altered on the lines requested by the objector. I am content with this.

10.7.3 PPG12 advises that plans should list any previously safeguarded road schemes which are to be abandoned. As the Plan is silent on this point, it is not clear whether or not there are any such schemes. If there are, the Plan ought to be amended accordingly. While the Plan indicates the route of the Rickerscote Bypass is already subject to protection, the status of this scheme prior to its inclusion in the Plan is not entirely clear. Nevertheless, it would probably be appropriate to mention this scheme following the decision to abandon it [10.12].

10.7.4 In my view **DOE**'s concern about the lack of clarity regarding the likelihood of schemes being implemented is well founded. It seems to me that, in part at least, this stems from the "policy" being a mixture of proposals for the construction of programmed schemes and the identification of routes to be safeguarded or "protected" as it is put. The Policy does not differentiate between actual proposals to build roads and the identification of routes to be safeguarded. I also consider that the phrase "*where there is a reasonable likelihood that these will be implemented*" appears to beg a question and imparts a further element of uncertainty into the policy. The Council accept the distinction between proposals and safeguarding and indicate a willingness to remedy this. While no precise suggestions are put forward, my opinion is that greater clarity would be imparted to the Plan if these two categories of schemes were identified separately and expressed as two policies.

10.7.5 It seems to me that the lack of clarity regarding safeguarded routes also underlies, in part at least, the objections by **A G Simmons** and **Stafford FOE** directed at the schemes listed under the sub-heading "Non-strategic". As PPG12 specifically refers to schemes of this type (i.e. *not* in the Structure Plan), I take no issue with the principle of including essentially local schemes in the Plan. As I see it, it is not necessary for such schemes to have been identified in the Structure Plan beforehand.

10.7.6 What does concern me however, is the Council's view that it is appropriate to view safeguarded routes in a longer time span than proposals where it is intended to commence work within about 10 years. I accept that the guidance in PPG12 regarding road proposals and safeguarding transport routes appear in different paragraphs (5.30 and 5.35 respectively). Nevertheless, paragraph 5.17 of the same PPG advises that, so

far as is practicable, the policies and proposals in local plans should be for a period of 10 years from the plan's base date. Moreover, according to paragraph 5.18, in considering timescales for policies and proposals, planning authorities should aim to keep blight at a minimum. In the light of this, my opinion is that it would not be appropriate to safeguard routes in the Plan unless there is a reasonable prospect of work commencing within 10 years or so.

10.7.7 **R Oldacre** objects to all the schemes listed under the policy heading. However, his concern is directed not so much at the merits of the schemes individually, but rather at the propriety of including road proposals in the Plan. In submitting that all road schemes should be cancelled, the objector contends that they encourage more travel by cars and are too expensive. I am mindful that much of the supporting evidence concerning the problems of road traffic and its implications for health and safety in particular went unchallenged. However, while these are not matters to be set aside lightly, national policy guidance does not support a complete moratorium on new road building. I am not satisfied that a sound basis for excluding all new road proposals from the Plan exists.

10.7.8 To my mind, the question of whether or not road schemes would lead to an increase in road traffic and car use, and to what degree, is closely linked to the promotion and implementation of schemes to manage the demand for travel. I consider the merits of each individual proposal still need to be examined, as it is not inconceivable that they could confer benefits which outweigh the objector's general concern. As regards the suggested alternatives to road building, such as raising finance from developers to subsidise a public transport fund, my view is that measures such as this go beyond the ambit of the Plan.

10.7.9 Contrary to **Berkswich PC's** view, I consider the local road proposals specified in the Structure Plan are identified adequately in the Plan. The merits of the individual schemes are considered below. In my opinion this objector's concern to see the scope of the policy expanded with a view to ameliorating or minimising environmental damage is covered adequately by Policy M10 and the addition thereto in the Suggested Changes. I am not satisfied that Policy M9 needs to be modified to cover these points.

## **Recommendation**

10.7.10 *I recommend that the Plan be modified by:*

- i. the inclusion of the Rugeley Eastern Bypass in accordance with the Suggested Changes;*
- ii. the substitution of amended supporting text as set out in PLI 051A SUP, paragraph 4.2;*
- iii. the inclusion of text indicating whether any other previously safeguarded road schemes have been abandoned and referring, if appropriate, to the abandonment of the Rickerscote Bypass.*

**AND THAT**

*Consideration be given to modifying the Plan by distinguishing between road proposals and safeguarded routes in the form of two separate policies.*

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## THE SCHEMES

### 10.8 M9 I (1) - THE STAFFORD EASTERN BYPASS

#### **The Objectors**

A list of the objectors to this proposal appears at Annex B.

#### **The Objections**

- The road is not needed on traffic grounds.
- The proposal will not reduce congestion in the town centre or on radial routes.
- Adverse impact upon the Sow valley, residential areas at Hillcroft and Baswich and upon Walton High School.
- The project would be a pollution and health hazard.
- Potential adverse impact on the Staffordshire and Worcestershire Canal Conservation Area.
- Adverse effect upon the setting of the Cannock Chase AONB.
- The proposal will lead to pressure for development on the urban fringe.
- Route C should be preferred.
- All road schemes should be cancelled.

#### **Background**

10.8.1 Structure Plan Policy 54 identifies the Stafford Eastern Bypass, (SEBP) Beaconside to Lichfield Road, as one of the schemes for completion between 1988 and 2001. Several possible alignments have been under investigation, the proposal in the Plan being known as Route G which extends through to Cannock Road, A34. The Highway Authority however, prefer a different alignment, referred to as Route C. Phase 1 of the project, between Beaconside and the northern edge of Baswich, is common to both routes. But whereas Route G skirts the eastern edge of Baswich and would pass between Weeping Cross and Walton-on-the-Hill, Route C follows a more easterly course, to the east of Walton. While **SCC (Highways)**' objection is that Route C should be included in the Plan rather than Route G, they regard the latter as a 'fall back' position.

10.8.2 Route C was the subject of two planning applications called in for determination by the Secretary of State and considered concurrently with Local Plan inquiry. While Route C is not a proposal in the Plan, a good number of the duly made objections refer to it. Because the merits of this alternative fall to be considered in the light of the objection by **SCC (Highways)**, I take account of these submissions in arriving at my conclusions. I am also mindful that although the Borough Council support SEBP as a project, they are in essentially neutral insofar as the route is concerned.

#### **Conclusions**

### *Need for the Project*

10.8.3 According to **SCC (Highways)**, the inclusion of the bypass in the development plan is sufficient indication of need. I acknowledge that PPG12 and PPG13 advise that where need, (for building or improving local roads within the primary route network), has already been examined in the Structure Plan, consideration in the Local Plan would normally be limited to detailed alignment. In this case however, the full SEBP project, which extends to Cannock Road as opposed to Lichfield Road, is not included in the approved Structure Plan. Phase 3 has been added following the more recent proposal to link through to the M6 via the A449 and the proposed Stafford Southern Bypass. So, although I accept the County Council's point on need in part, I am not persuaded that all I have to deal with is details of the route alignment.

10.8.4 Many of the individual objectors submit that there is no need for a new bypass to the east of Stafford. They consider the M6 Motorway to the west performs that function.

10.8.5 Although the M6 is the national strategic road from the Midlands to the north west of England, locally, it must act as a north-south bypass for Stafford. Likewise, further east, the A51 Rugeley to Stone road also provides a north-south route for traffic wishing to avoid the centre of Stafford.

10.8.6 The evolution of SEBP within the emerging transport strategy for Stafford appears to have been mixed; a scheme from Beaconside to Lichfield Road, in one form or another, has been under consideration in development plans for some time. It predates the transport policy reviews. But the purpose and the extent of the project has not been entirely clear. The project was formerly known as the Eastern Distributor Road. Perhaps, in view of the low percentage of by-passing traffic, as low as 6%, that was more apposite; the suggestion that SEBP would act more as a distributor road is understandable. The need for the road as a bypass, is limited. Moreover, an examination of the likely traffic flows along the three sections of the route suggests that the part not shown in the development plan, i.e. between Milford Road and Cannock Road, is least needed and indeed, gives rise to most environmental objections.

10.8.7 Phase 1 would provide a substantial improvement on the existing link between Baswich and Beaconside. It would allow for relief to the urban section of Baswich Lane, leaving the rural part suitable for use by walkers and cyclists. But Phases 2 and 3 appear to perform better as links to new development and to provide opportunities to open up areas east of Stafford for new development, rather than act as part of a much needed bypass. It is true that worthwhile reductions of traffic on some roads would be realised, particularly on the overloaded Radford Bank/Queensville Roundabout section of the A34. Some travel times would be reduced too. But that would be at the expense of a big increase on Weston Road into Stafford. The criticism of many objectors that SEBP would largely act merely to redistribute town centre traffic around existing radial roads, and that the intention to build the road predates recent thinking on reducing unnecessary trips into Stafford, is difficult to resist.

10.8.8 Estimates of traffic volumes on the three sections of SEBP show a disconcertingly wide variation. Assuming a Southern Bypass, traffic on the new road in 2015 would vary from 6,210 on Phase 3 to 13,190 on Phase 2 up to 25 - 26,000 on Phase

1. That might suggest a limited need for the southern part, increasing up to Phase 1, when the new road would operate beyond capacity, even widened to a 10m carriageway.

10.8.9 As part of an evolving transport strategy which includes removing non-essential traffic from the centre of Stafford, reducing congestion and generally meeting the criteria set in Structure Plan Policy 55, the project seems to make only a limited contribution, yet at a high capital cost.

10.8.10 There may be a good case for Phase 1 of the scheme. Indeed, it is supported by several of the objectors. But, even assuming that a connection from eastern Stafford south to the M6 would be an asset, the need for the southern sections of the bypass seem more tenuous. I consider that the effect of this conclusion is that environmental objections to Phase 2 and especially Phase 3 may more readily outweigh any benefits the new road might bring.

10.8.11 The only housing site linked to the scheme in the Plan is Proposal H2 which is close to Route G and the first part of Phase 2 of Route C. The potential which could be released if this Route G were to be adopted is much less than for Route C which is better placed to serve large scale expansion on the eastern side of Stafford. As the Plan does not provide for this, and having regard to my conclusions regarding the objections seeking the allocation of land for housing in this area, this is not a point to which I attach much weight. It is however a consideration which may have implications beyond the current plan period.

## ***PHASE 1***

### *Appearance*

10.8.12 I consider that few people living either side of the new road north of the railway would be much worse off than now if Phase 1 of SEBP was built. At the northern end, at Weston Road, some residents on Kingston Hill would see part of the road at a distance. So would some of those living in Tixall Road and Wolesley Road; again at a distance. Because of the limited backdrop of the rising ground to the east, none, in my view, would suffer an unduly harmed outlook.

10.8.13 South of St. Thomas Lane, where the road would be on a viaduct or embankment, the intrusion would be more significant, affecting St. Thomas Cottages more than Froghall Cottage or St. Thomas Priory Farm. Homes on the two caravan parks which look to the west would have views largely restricted by the associated 2 m high noise fence, limiting any adverse effect of the appearance of the road. A much improved link between the railway and Beaconside would be provided. Overall, my conclusion on this point is that there would be some, but not unacceptable, harm.

### *Noise*

10.8.14 Four homes in Sheringham Covert and two in Wolesley Road would be likely to be eligible for noise insulation grants. Numerous others would experience noise increases ranging from marginal to significant, but would not reach levels where grants

for insulation would be available. Further south, below St. Thomas Lane, the scatter of houses near the river would be mostly further from the new road than Baswich Lane. The caravan parks would be provided with a noise attenuation fence. Both factors would be likely to limit any noise increases to acceptable levels. Again, I find insufficient harm to amount to a cogent objection.

#### *Air Quality*

10.8.15 None of the locations identified by the County Council as "sensitive" to air pollution emissions from traffic on the proposed bypass front Phase 1. But, because traffic volumes on this section would be greater than Phases 2 and 3, the spread of air pollution would be wider. The analysis carried out by the County Council shows greater concentrations of nitrogen dioxide and carbon dioxide at junctions. But, because of anticipated improvements due to increased use of catalytic converters, the design year levels are expected to be less than opening year levels.

#### *Convenience*

10.8.16 Any problems of severance caused by the new road immediately south of the Beaconside roundabout would be remedied by building a footbridge over the bypass, even though that would be less convenient than an at-grade crossing. I would expect those living at St. Thomas Cottages and St. Thomas Priory Farm to gain from removal of through traffic from in front of their homes. Mobile home occupiers should find a new access at least as convenient as the existing, with better connection towards Beaconside. Provision of pedestrian and cycling facilities on the stopped up length of Baswich Lane would be an advantage. There would be the loss of some eight mobile homes on the Borough Council's Saltings Mobile Home Park. That is regrettable, but a route has been safeguarded here for several years. The park is subject only to a temporary planning permission.

#### *Impact upon the Countryside*

10.8.17 Although the first section of the new road would run from Beaconside roundabout across open agricultural land, it would not be unacceptably harmful. Some hedgerows would be lost and farmland severed, but the landscape down to Tixall Road seemed to me to be of no particular merit. Hedges would be replaced and roadside boundaries planted. Even if, in time, the road was widened to a single 10 m carriageway, I do not consider its impact would be unacceptable.

10.8.18 The bypass would certainly have an urbanising effect, worsened at night by highway lighting proposed throughout the scheme. The suggested use of low level cut-off lighting, which would allow little light to escape sideways and upwards, would lessen this effect. But some detrimental effect on the rural character of this predominantly open area of countryside would remain, despite comprehensive planting schemes.

10.8.19 As the bypass descended to the floodplain of the River Sow, the adverse effect would worsen. Here, between Tixall Road and the railway, the best of mitigation would be necessary to overcome objection to an elevated crossing of the river and nearby Staffordshire and Worcestershire Canal. On balance, I consider the County

Council's suggested landscaping and planting measures would be sufficient, even though their success might depend, in part, on off-site work which would need landowner consent.

10.8.20 Special care would be needed in the detailed design of the proposed 110m viaduct crossing of Kingston Brook and River Sow. Softening of the effect of the embankment by means of planting the side slopes would be helpful, but would hardly eliminate intrusion. The offered off-site mitigation planting might be useful, although there would be limits to the benefits of trying to hide unsightly traffic on the elevated road. The intended brick facing to the canal crossing should be in keeping with existing canal structures so as to limit any harm to the attractiveness of the canal side conservation area. The intention to plant the residual area between the old and new road each side of the canal would also help offset harm.

### *Ecology and Agriculture*

10.8.21 The first section of Phase 1, up to St. Thomas Lane, would cross arable land and improved grasslands which are understood to be of limited ecological value. The less disturbed river floodplain is more sensitive; the road more likely to cause damage. But I am satisfied that the suggested mitigation measures would be sufficient to reduce possible harm to acceptable levels.

10.8.22 The Baswich Meadows SSSI, east of the road and north of the canal could be adequately safeguarded. That is, if sufficient care was taken during construction of the bypass and by ensuring that run-off water from the road would not contaminate the SSSI. Piping this water downstream of the SSSI, as suggested by the County Council, might be necessary. Elsewhere on the floodplain crossing, it is intended that extra land be taken to provide compensatory habitats.

10.8.23 There would be some severance and loss of arable and grazing land. But loss of agricultural land was not at issue at the inquiry. There is no MAFF objection.

### *Overall Effect*

10.8.24 My overall conclusion is that the objections to Phase 1 should not prevail. There would be some harm to the character of the countryside north of the railway. There would also be some damage to the open and attractive appearance of the Sow Valley. Careful bridge and embankment design would be needed to ensure any adverse effects of the Sow river viaduct crossing and of the road on the Staffordshire and Worcestershire Canal Conservation Area were limited. Similarly, road drainage outfall might need to be taken beyond the Baswich Meadows SSSI to avoid any contamination of wetland. Overall, however, I consider that the value of replacing an existing substandard road link and the proposed mitigation measures are sufficient to overcome the objections to Phase 1 of the project.

## ***PHASE 2***

10.8.25 Eastward from Baswich Lane, almost as far as Stoneford Bridge, Phase 2 of Routes G and C is the same. From the latter point, Route G turns south, running close to Falmouth Close and Stockton Lane, to join Milford Road, A513, near to the junction

of the main road with The Rise. Route C continues eastward alongside the railway for another 500 m or so before turning south to join Main Road (A513) just to the east of its junction with School Lane.

## ***ROUTE G***

### *Appearance*

10.8.26 If my recommendation regarding Proposal H2 is accepted and a scheme is implemented, the northern outlook of the houses along Compton Road and Falmouth Avenue would be dominated by housing, not by the new road. Views to the bypass from the Lodgefield Park mobile home site would be interrupted by the railway and, in time, largely obscured by planting in the dips in the undulating ground between the new road and the railway. I think this would also be sufficient to safeguard the canal conservation area.

10.8.27 It is more a matter of detail, but I would prefer to see the line of Route G taken further east around Falmouth Close and, as it ran south, further east of the rear of houses in Stockton Lane. The adverse effect would be reduced by the road being in cutting along the rear of Stockton Lane, but highway lighting would be intrusive; more so if the land immediately to the east is to remain undeveloped. As Milford Road, is approached, there would be some disruption caused to the activities of Walton Garage by the possible need to take some of the car parking area north of the A513. Providing a good alternative access to the garage might be difficult.

### *Impact upon the Countryside*

10.8.28 If Proposal H2 is implemented, the pleasant open strip of land will become more like the suburban housing estates in Baswich. The section of the bypass alongside it and up to Falmouth Close would add to that urban look, but little more than any access road necessary to serve the site. If this land is to be lost to the countryside, the new road would have little worsening effect. Even if housing was moved closer to the railway as **Barratt West Midlands Limited** suggest, the canal conservation area would be largely protected from the effects of the road by the land undulations and, in time, by planting north of the road.

### *Ecology and Agriculture*

10.8.29 There is little fauna of note along this section of the proposed road. As with Phase 1, there would be some loss of agricultural land and severance, but I do not regard this as serious.

### *Noise*

10.8.30 Noise attenuating fencing would be offered to Lodgefield Park on the southern boundary close to the railway. The mobile home site would also be separated

from the new road by the railway. Planting to the northern edge of Phase 2 would also aid attenuation. It would be likely to limit any noise increases to acceptable levels.

10.8.31 Residents of Falmouth Close and Stockton Lane would be most affected by noise from Phase 2 of the project. In this respect Route G would be worse than Route C; it would be slightly worse than the "do nothing" situation. Some of this might be helpfully alleviated by moving Phase 2 a little way to the east from Stockton Lane.

#### *Air Quality*

10.8.32 As with Phase 1, none of the locations identified by the County Council as "sensitive" to air pollution emissions from bypass traffic front Phase 2. Their analysis used arbitrarily low figures of 2ppm for carbon dioxide instead of 9ppm and  $60\mu\text{gm}^{-3}$  98th percentile hourly average concentrations instead of  $200\mu\text{gm}^{-3}$  for nitrogen dioxide. On Phase 2, even this figure would not be reached, let alone the higher recommended guidance levels. Even so, some unpleasant perception of traffic fumes associated with the scheme would be likely to affect residents of Falmouth Close and Stockton Lane.

#### *Convenience*

10.8.33 There would be valuable reductions of traffic on Milford Road and Baswich Lane (if restrictions were placed on the latter). The proposed underpass to the Stoneford Bridge track would avoid cutting this route, even though enjoyment of its tranquillity south of the railway would be diminished. Running the new road alongside the railway would ensure no further severance.

#### *Overall Effect*

10.8.34 I consider it is possible to provide enough mitigation to Phase 2 of Route G to say that objections made to its inclusion in the Local Plan are not persuasive. No agricultural objection is raised. Assuming development proceeds on site H2, I conclude there would be little material harm caused to either the countryside or the local ecology.

### **ROUTE C**

#### *Appearance*

10.8.35 In my opinion there would be a substantial adverse effect on the outlook of those living close to the new bypass. Approaching Main Road, residents living either side of Nos.196 and 198, the houses proposed to be demolished, would have views dominated by the new road, as would Walton Tennis Club members. The two houses either side of the road would have their gardens flanked by a new road rather than neighbouring gardens, an unpleasant prospect. Occupiers of Nos.196 and 198 are likely to be upset by the need to take their homes too.

#### *Impact upon the Countryside*

10.8.36 Further along Phase 2 of Route C, beyond Falmouth Close, up to the A513, I consider the bypass would become far more damaging. The sweeping turn to the south would be clearly seen from parts of the Cannock Chase AONB to the east. From the conifer wood onwards, the new road would appear as an intrusive gash, cutting unhappily through the east facing slope down to Green Gore Lane. Over Green Gore Lane, the bypass would cut through the opposite, west facing, slope with no less dramatic effect when seen from the lane itself. Planting either side of Green Gore Lane close to the railway and on the cutting slopes would help. But I consider that the damage to the countryside and some of the view to the west from the AONB would be substantial.

#### *Ecology and Agriculture*

10.8.37 There is little fauna of note along this section of the proposed road. Route C would take most of the small conifer wood alongside the railway near Falmouth Close. But as the wood is not of particular value, adverse effects would be limited. There would be some loss of agricultural land and severance, but I do not regard this as serious.

#### *Noise*

10.8.38 Four houses in Main Road would probably be eligible for noise insulation grants. As in the case of Phase 1, others would experience noise increases ranging from marginal to significant, but would not reach levels where grants for insulation would be available. These problems would be offset by reduced traffic and thereby less traffic noise on the A513 to the west.

#### *Air Quality*

10.8.39 None of the locations identified by the County Council as "sensitive" to air pollution emissions from bypass traffic front Phase 2. Nevertheless, some unpleasant perception of traffic fumes associated with the new road would be likely to be experienced at Walton Village Hall and the Tennis Club.

#### *Convenience*

10.8.40 There would be valuable reductions of traffic on the A513 and Baswich Lane (if restrictions were placed on the latter). Proposed underpasses to the Stoneford Bridge track and to Green Gore Lane would avoid cutting those routes, even though enjoyment of their tranquillity south of the railway would be diminished. Running the new road alongside the railway would ensure no further severance.

10.8.41 Providing suitable replacement accesses for the houses fronting the A513 west of Route C could prove awkward. Running the bypass close to the corner of the Tennis Club courts would be a disturbing feature. It would lessen enjoyment of the club. I find the local complaint that the Parish of Berkswich would be divided by the road not too weighty. Milford did not strike me as an integral part of Walton-on-the-Hill.

#### *Overall Effect*

10.8.42 To my mind, little ecological harm would be caused by the second part of Route C. But there would be substantial damage to the appearance and rural nature of the countryside between the A513 and the railway, especially when seen from Green Gore Lane and parts of Cannock Chase.

### *PHASE 3*

#### *ROUTE G*

10.8.43 Phase 3 attracted the largest number of, and in my view, the most convincing objections to Route G. Among weighty objections are those by **R.O.A.D.S.**, **The Governors of Walton High School** and **B Holt**. I consider the School Governors in particular raise a number of important concerns. They are sufficient to persuade me that this part of Route G is unacceptable.

10.8.44 As the Governors point out, the project would pass within some 5 m of temporary classrooms and about 25 m from the permanent main building of Walton High School. The temporary classrooms could be moved if the road was built in the gap set aside for the purpose. But it is the narrowness of this reserved gap between the housing on Selworthy Drive and the School and indeed, the Berkswich Methodist Church, which is at the heart of the problem.

10.8.45 It would appear that neither the School nor the Church were built when the reservation was first made for building a new road through to the A34. Presumably, the reserved gap was thought wide enough at the time, but I would be unhappy now to see a new road running close to the School's main building, the schoolyard and alongside its playing fields for some distance. Noise, dust and fumes would be likely, if not to directly cause measurable health problems, to create a poor environment for schoolchildren.

10.8.46 There would also be exacerbated access and congestion problems, only partially solved by a footbridge crossing. Most pupils come from the west, on the other side of the road from the School. Because of the need to minimise loss of the School playing field space, the road would pass close to housing on Selworthy Drive and Victoria Way. The result, in my view, is that the road would be too near to these houses. The road has been mooted for some time. But perceptions and anticipation of acceptable living standards have probably increased over recent years, with more awareness of the harm likely to be caused to health by road traffic.

10.8.47 Evidence shows that Walton High School and the Methodist Church would experience air pollution figures in excess of the arbitrarily low levels suggested by Staffordshire County Council. Their suggested figures were about a quarter of current guideline levels for Carbon Monoxide and Nitrogen Dioxide. I accept the premise of the County Council's case that the figures remain well under current limits. Nevertheless, I regard the introduction of a new source of pollution close to the school as another concern which strongly militates against this part of Route G. It may be possible to move the road away from Selworthy Drive, but the School would present a more difficult problem, short of rebuilding it elsewhere.

10.8.48 There is little objection to the rest of Route G south of the school. I concur. The road would move further from housing as it approached the A34, cutting off scarcely any farmland.

## ***ROUTE C***

### *Appearance*

10.8.49 Views of Phase 3 of Route C from nearby housing would be limited mainly to the area around Main Road, Oldacre House, Wilton Close and Briar Close in the Pine Crescent part of Walton-on-the-Hill and Brocton Park Farm. Apart from the first and last mentioned, I would expect the outlook from those properties to be little affected. This is because of the depth of cutting proposed for the new road and the extent of the planting suggested between the road and Walton-on-the-Hill. Likewise, the bypass would be scarcely seen from housing in the village. The situation would be quite different for those living close to Main Road where the fairly open aspect near the proposed road crossing and roundabout would appear substantially more built upon and urbanised.

### *Noise*

10.8.50 As a means of lessening the effect of the new road on its surroundings, the variation of Route C as proposed in the County Council's second planning application shows this phase in a deeper cutting from the A513 southwards around Walton-on-the-Hill. This would have a worthwhile attenuating effect on road noise experienced by local people. Some properties would experience noticeable noise increases, e.g. Walton Bury Nursing Home, but none would be such as to warrant a grant for noise insulation. Even so, particularly because of their wider opposition to the bypass, I expect there would be many living in the vicinity of the new road who would consider that their quiet appreciation of the rural area around Walton-on-the-Hill had been materially harmed.

### *Air Quality*

10.8.51 "Sensitive" locations, that is, where occupiers may be the very young or elderly who might have breathing difficulties, on this phase were determined to be the "Busy Bees" Nursery School close to the proposed junction of Phase 3 and Milford Road, Walton Bury Nursing Home and Berkswich Primary School. The latter appears to be too far from the proposed road for problems to arise. Of the other two premises, only "Busy Bees" is shown by County Council's evidence to be within the arbitrary 2ppm carbon monoxide level, a figure well below the recommended limit of 9ppm. Nevertheless, I share some of the disquiet expressed by local people, that the proposal to build a new road and junction close to a young children's nursery school does not lie happily with the need to care for their health.

### *Convenience*

10.8.52 I consider that most of the possible public roads and right of way severance problems are adequately addressed by the County Council's design for the scheme. The crossing of Brocton Lane and the provision of a bridge for BP 7 would

minimise inconvenience, as would the reasonably commodious diversions proposed for FPs 6 and 8. There would be some reduction in the enjoyment of those routes for local walkers, however, because of what I would expect would be their continued displeasure about the new road. I do not doubt that those walking from Walton-on-the-Hill in the direction of Cannock Chase would feel that their pleasure had been much diminished. The pleasant character of several rural walks into the countryside would be substantially affected by the presence of the new road.

10.8.53 Access into School Lane for eastbound traffic on the A513 might be difficult to achieve. This could prove to be somewhat inconvenient.

#### *Impact upon the Countryside*

10.8.54 I consider this part of the scheme would impart the greatest harm on the local environment. The area between Walton-on-the-Hill and Cannock Chase is an attractive strip of open countryside on the edge of the village, close to the conservation area, sloping down to a small brook near Jacob's Ladder, before rising towards the Chase. It seemed to me to be an area worthy of particular protection from built development which would close the gap between the Chase and the village.

10.8.55 Views to the west from the rising ground of the Chase would, as in the case of Phase 2 as it approached Milford Road, be materially harmed by the intrusion of the new road encircling the eastern side of Walton-on-the-Hill. The lowering of the bypass along this stretch and the mitigation planting suggested by the County Council would go some way to alleviate the extent of this harm. But even if the road was rather artificially almost hidden by the deeper cutting envisaged in the second planning application, and growing trees along its sides, the open unspoiled character of this pleasant edge to Walton-on-the-Hill would be lost.

10.8.56 I consider there would still be substantial damage to the setting of the Chase and the Walton-on-the-Hill Conservation Area. This effect would not be aided by the understandable need to erect deer fencing along sections of the road, to prevent animals from the Chase venturing onto the road. Neither would the intention to provide lighting along the bypass. This may be needed to ensure highway safety at night, but even with low glare lights, there would be some escape of light adversely affecting the immediate area.

10.8.57 As the bypass swung to the west towards the A34, Cannock Road, it would remain in cutting, running across open agricultural fields. Even more than the first section of Phase 3, the bypass would run across open countryside, albeit possibly less worthy of special protection. It is in this area, south and west of Walton-on-the-Hill, that more pressure for release of land for housing would be likely to follow building the bypass. In time, a yielding to that pressure could change the nature of Walton-on-the-Hill, bringing it into the urban area of Stafford.

#### *Ecology and Agriculture*

10.8.58 No notable ecological features were pointed out as in need of special protection along the line of Phase 3 of the bypass. The agricultural land south of the Walton High School playing fields, would be enveloped by the new road, but severance

is not raised as a problem. A number of local residents are concerned about the new road possibly encouraging urban sprawl. This does not directly affect my consideration on the acceptability or otherwise of SEBP. But in the overall long term planning of Stafford, it may be that there should be a recognition that the line of the road may not be entirely unconnected with urban boundaries.

### *Overall Effect*

10.8.59 In my opinion Phase 3 of Route C would cause substantial harm to the setting of the Walton-on-the-Hill Conservation Area, the Cannock Chase AONB and to the appearance and character of the land between Walton-on-the-Hill and the Chase. I do not think the design and alignment of Route C could be altered so as to overcome this objection. The amendment embodied in the second planning application probably achieves the best available solution by dropping the road into a fairly deep cutting. However, that would bring its own problems of excess spoil disposal and higher cost. Coupled with my conclusion that there is not an overwhelming justification for the new road, I consider the factors detailed above represent cogent objections to including Route C in the Plan as an alternative to Route G.

### **Overall Conclusion**

10.8.60 The Structure Plan identifies SEBP from Beaconside, but only as far as Lichfield Road, i.e. the A513. As the only route protected at the time the Structure Plan was drafted was what is now known as Route G, it may be concluded that the only approved development plan shows Phases 1 and 2 of Route G.

10.8.61 In my view, SEBP would comply reasonably with Structure Plan Policy 43; it would improve access between parts of the urban area east of the town centre. There would also be some compliance with Policies 40 and 41; it would create an opportunity to restrict through traffic on Baswich Lane north of Weeping Cross and traffic using Radford Bank would be reduced, although there would be a sizeable increase on Weston Road. It would also largely meet the criteria in Policy 55, although I doubt whether the increased traffic in Weston Road would improve safety for pedestrians and cyclists (criteria j and k). Some of the criteria of Policy 44, which is directed at mitigating the environmental impact of highways, would be met. But, because of the impact upon Walton High School in particular, I consider there would be serious conflict with (a).

10.8.62 In my view the objections to the route covered by Phases 1 and 2 of the proposal in the Plan are not sufficiently compelling to warrant its exclusion from the Plan. On the other hand, I find the objections to Phase 3 convincing and compelling. I consider this element of the proposal, which is not covered by Structure Plan 54, should be deleted.

10.8.63 Despite the highway authority's preference for Route C, I am equally concerned about the impact of the easterly portion of Phases 2 and 3 of this option. In my view, it would cause serious harm to the appearance of the area and the setting of the AONB. I also consider that there would be both short and long term harm to the setting of the Walton Conservation area. As I see it, there would be serious conflict with Structure Plan Policy 44 (e) and (i) and with the provisions of Policy 99 too. I find

similar conflict with Local Plan Policies M10 and ED30. My conclusion therefore is that Phases 2 and 3 of Route C should not be substituted for the respective phases of Route G.

10.8.64 SEBP would bring some benefits. There would be worthwhile relief to some radial roads and probably some reduction in accidents too. Nevertheless, in the light of the foregoing, I am unable to support the desire of the highway authority, endorsed by the Borough Council, to see provision for a road link between Beaconside and Cannock Road included in the Plan. I acknowledge that my conclusions regarding the stretches of Routes G and C between the A513 and the A34 will make it more difficult to create a more extensive highway link from Beaconside through to the A449 and M6 south of Stafford. Indeed, I accept that my findings could well necessitate a fundamental re-appraisal of the bypass project as whole. However, in the absence of what I regard as compelling objections to Phases 1 and 2 of Route G, I see no justification for recommending that these parts of the proposal be deleted from the Plan.

10.8.65 I appreciate that not including the road in its entirety in the Plan, may leave the County Council in some difficulty insofar as their future plans for Stafford's highway network are concerned. But as the main traffic problems in Stafford appear to me to be more concerned with access to and from the town centre, rather than an inability to bypass the town, the solutions may lie in more radical traffic control in and around the town centre rather than by building new roads around the town's periphery.

### **Recommendation**

10.8.66 *I recommend that the Plan be modified by the deletion of the section of Proposal M9 I (1) between Milford Road, A513, and Cannock Road A34.*

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**10.9 M9 II (2) - THE STONE TOWN CENTRE BYPASS**  
**M9 II (3) - STONE: THE OPAL WAY TO BEACON RISE LINK**  
Objection Nos: 0407/28 & /29 R Oldacre.

### **The Objections**

- All road schemes should be cancelled.

### **Conclusions**

10.9.1 The objections have been overtaken by events; both these schemes have been built. As the projects are no longer 'proposals', I see no need to include them in the Plan.

### **Recommendation**

10.9.2 *I recommend that the Plan be modified by the deletion of Proposals M9 III (2) & (3).*

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## 10.10 M9 III (4) - THE GNOSALL BYPASS

### **Objection Nos:**

A list of the objectors to this proposal appears at Annex C

### **The Objections**

- The bypass is not needed.
- The proposal would cut Gnosall in two.
- The proposal does not accord with Structure Plan Policy 44.
- Adverse effect upon living conditions of nearby residents.
- Destruction of a valued local amenity.
- Damage to and loss of wildlife habitat.
- Failure to acknowledge the Grade 1 SBGI along the disused Stafford - Newport Railway.
- All road schemes should be cancelled.

### **Conclusions**

10.10.1 Structure Plan Policy 54 identifies the Gnosall Bypass as a potential project for completion between 1988 and 2001 and notes that land required for the scheme will be protected. Although a number of objectors question the need for a bypass here, my view is that the scheme's inclusion in the currently approved Structure Plan is sufficient to warrant its incorporation in this plan. In so saying, I am mindful that PPG12 advises that the need for strategic road schemes will already have been examined in the Structure Plan process. Other objectors suggest alternatives to the construction of a new road. Innovative though some of these may be, I am not satisfied they warrant the displacement of this already approved scheme from the Plan.

10.10.2 The two Inset Maps for Gnosall show what is referred to in the key as a "Protected Route for new road" in the form of a dotted line. To my mind this manner of presentation implies a precise route. The route depicted follows the former Stafford to Newport railway which runs between the northern and southern portions of Gnosall.

10.10.3 From the representations made, it is abundantly clear that many local people regard Gnosall very much as a single village. From a community standpoint, I can well appreciate why this is so, but as I perceived it, physically, Gnosall is characterised by two main concentrations of development separated - notably to the north-west of Station Road - by appreciable tracts of open land. The road scheme would be a significant new element, but provided that reasonable links, especially for pedestrians, were maintained, I do not consider it would unacceptably harm the cohesion of the village.

10.10.4 I am more concerned however about the scheme's implications for the disused railway. In this respect I find the objections well founded. From both the

submitted evidence and my own observations, it is apparent that much time and effort has been expended to create both an attractive local amenity and, as the **Gnosall Civic Society** put it, a "haven for wildlife". I am also mindful that parts of the former railway are identified in the Plan as Grade 1 SGBIs. To my mind a scheme on the alignment indicated in the Plan would be likely to cause considerable harm to a valuable local feature. In my opinion it would be in conflict with Structure Plan Policy 44 and Policy ED37 of the Plan. As the scheme is close to the houses and gardens on the north side of Newport Road and Glendower Close, there is a distinct likelihood that residents' living conditions could be adversely affected by noise, fumes and visual intrusion. I see this as a further disadvantage.

10.10.5 At the inquiry, I heard that the construction of the bypass is not now envisaged within the plan period; it is not included in any programme, nor has provision been made for its funding. Staffordshire County Council, the highway authority, do not consider this scheme, or the Haughton Bypass, will commence within the next ten years or so and merely seek to safeguard the alignment of the route. In my view this makes the prospect of the scheme being implemented appear somewhat questionable. Nevertheless, given that the scheme derives from the approved Structure Plan, I consider the forthcoming review of the Structure Plan is the appropriate forum for determining the project's future.

10.10.6 PPG12 advises that the use of diagrammatic lines to illustrate a safeguarded route should not be used where it could be misleading. Given the degree of uncertainty which surrounds the bypass, I find this is just such an instance, especially as I heard that the precise route of the road is not known at present. In these circumstances, I would prefer to see the notation be deleted from the Inset Map.

10.10.7 PPG12 also states that when a precise route is not known, an area within which a safeguarding policy is to be applied may be defined. Having heard that the intention is to protect a corridor for the possible route so that it would not be prejudiced by development, there could be a case for pursuing this option. However, despite the inclusion of the bypass in the Structure Plan, my opinion is that the proposal is not sufficiently advanced to make this alternative a reasonable proposition.

### **Recommendation**

10.10.8 *I recommend that the Plan be modified by the deletion of the "Protected route for new road" notations from the Inset Maps for Gnosall North and Gnosall South.*

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### **10.11 M9 III (5) - THE HAUGHTON BYPASS**

**Objection Nos:** 0407/31 R Oldacre; 0494/21 Staffordshire Wildlife Trust.

### **The Objections**

- Failure to acknowledge Grade 1 SBGI along the disused Stafford - Newport Railway.
- All road schemes should be cancelled.

## Conclusions

10.11.1 While the Plan's Technical Appendix identifies two Grade 1A SBGIs along the disused railway at Haughton, the line of the bypass indicated on the Haughton Inset Map is some distance away from them. I do not consider they are likely to be affected.

10.11.2 Although the scheme is included in the Structure Plan the County Council indicate that it is unlikely that it will commence within the next ten years or so. In the light of this, while no other objections have been made to the route depicted on the Inset Map, my view is that, like the similar proposal for Gnosall, it ought to be deleted therefrom.

## Recommendation

10.11.3 *I recommend that the Plan be modified by the deletion of the "Protected route for new road" notation from the Inset Map for Haughton.*

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## 10.12 M9 III (6) - THE RICKERSCOTE BYPASS

**Objection Nos:** 0407/32 R Oldacre, 0494/23 Staffordshire Wildlife Trust; 0532/24 West Midlands Bird Club; 0946/09 A G Simmons; 1470/01 Governors of St Leonards Primary School; 1498/96 Stafford FOE.

## The Objections

- The scheme is unnecessary.
- Adverse effect upon wildlife habitat.
- Adverse consequences for the highway safety in Lichfield Road.
- Increased noise and pollution.
- All road schemes should be cancelled.

## Conclusions

10.12.1 Since the Plan was placed on deposit, the County Council resolved to abandon this scheme. In the light of this action, which in my view would meet the concern of the objectors, I consider the proposal should be deleted from the Plan.

## Recommendation

10.12.2 *I recommend that the Plan be modified by the deletion of Proposal M9 III (6).*

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<u>10.13 M9 III (7) - THE ROWLEY LINK</u>	<u>M9 III</u>
<u>(8) - THE CASTLEFIELDS LINK</u>	<u>M9 III (9) -</u>
<u>THE DOXEY ROAD TO GAOL SQUARE LINK</u>	

**Objection Nos:** 0001/35 N B Thomas; 0006/01 J Milln; 0026/01 A Moore; 0184/02 C E Coates; 0188/01 F E Townsend; 0328/01 Cllr R E Mole; 0329/04 A Davenport; 0330/03 R Foulkes: Save Castlefields Group; 0331/02 R V H Butters; 0333/02 E G Sittig; 0334/01 K Nee; 0335/02 Mr & Mrs F Ryder; 0336/02 & /04 Mr & Mrs J Rogers; 0339/02 J Maslin; 0343/01 Powergen plc; 0403/07 Diocesan Schools Commission of the Roman Catholic Archdiocese of Birmingham; 0407/07 & /33-35 R Oldacre; 0408/27 Lord Stafford; 0494/22 Staffordshire Wildlife Trust; 0523/01 R F Talbot; 0549/02 A R & G A Brookes; 0550/02 J C & W M Jones; 0551/02 A Liveing; 0552/02 N L Foster; 0553/02 P A Talbot; 0693/01 M Shemza; 0694/03 C H Soutar; 0913/78 Mr & Mrs P Baker; 0914/59 WWFN; 0945/03 Castle Church PC; 0946/10-12 A G Simmons; 1498/97-99 Stafford FOE; 1427/02 J Burgess; 1434/02 D J Bastable; 1435/02 L Cooke; 1452/01 P A Quinn; 1453/01 J Quinn; 1779A/23 Tarmac Midlands Housing Division; 1923/01 M Naylor; 1924/01 S H Burton; 1925/01 R H Critchley; EN0547/01 M P Archer; EN0548/01 J V Archer.

### The Objections

- The schemes will not alleviate congestion on Newport Road.
- Increased danger to pedestrians.
- Loss of pleasant open land.
- Adverse effect upon Brunswick Terrace.
- Adverse effect upon the Blessed William Howard High School.
- The Castletown Link scheme is no longer needed.
- Adverse consequences for Castletown.
- Need to expand the safeguarded area at Castletown.
- An alternative route should be preferred for the Castletown Link.
- Adverse effect on the Doxey and Tillington Marshes SSSI.
- Effect upon property between Glover Street and Chell Road.
- All road schemes should be cancelled.

### Conclusions

10.13.1 In the Plan these proposals appear as separate "non strategic" schemes. The Plan is silent insofar as their intended function is concerned. However, in the County Council's Transport Strategy, a product of their Transport Policy Review, the

three roads are identified as elements of a "major highway scheme", the Town Centre Western Bypass. Because of this, I consider the proposals jointly.

10.13.2 Although the Town Centre Western Bypass is described as a "Proposed Primary Distributor" in the Strategy, unlike the Gnosall and Haughton Bypasses, it is not included in the Structure Plan. Nor does it appear in the TPP submissions. The Plan makes no reference to it either, although the Council's submissions acknowledge the importance of this project.

10.13.3 I am mindful that the objections by **SCC Highways** which sought the recognition of the Castlefields and Rowley links as strategic schemes have been withdrawn. Nevertheless, as it is clear that the highway authority regard the bypass as a key feature of the future transport strategy for Stafford, my view is that its three component parts ought to be regarded as strategic highways. While evidence regarding the need for the bypass was presented to the inquiry, my opinion is that it ought to be examined in the broader context of a comprehensive transportation strategy as part of the current Structure Plan review.

10.13.4 The Plan indicates that each route is already subject to protection, but this "status" is not clear. While I have read that the concept of a link from Newport Road to Doxey Road has been under consideration for some time, at least as far back as the 1970s, none of the three routes are shown in the Plan's predecessor, the Stafford Area Local Plan. In the absence of an approved strategic context which has been the subject of public consultation, I attach little weight to the merits of the Town Centre Western Bypass as a reason for including the individual road schemes in the Plan. For the same reason, and mindful that the schemes are not included in any current programme either, I do not consider they can be regarded as sufficiently advanced to justify being included in the Plan as safeguarded routes or as the subject of safeguarding policies. I am unable therefore to concur with the Council's submission that the safeguarding of a route about to be promoted within the context of a strategic policy is consistent with the role of development plans described in paragraph 1.1 of PPG12.

10.13.5 In my opinion the retention of the schemes in the Plan in an aura of uncertainty would almost inevitably lead to property blight. Given that PPG12 advocates keeping blight to a minimum, I see this as a further disadvantage. It seems to me that apart from the implications for open areas such as the Doxey and Tillington Marshes SSSI, and the land between Newport Road and Wolverhampton Road, the prospect of blight could have adverse consequences for the listed Brunswick Terrace and the functioning of educational and commercial premises in the immediate vicinity of the routes indicated on the Stafford Area Inset.

10.13.6 **Staffordshire Wildlife Trust's** objection is that a need for a link from Castletown to Stone Road via the route of the disused Stafford to Uttoxeter railway, which runs through the SSSI, could be created. While the objector's concern is understandable, there is no evidence before me to show that this is likely to be the case. I attach little weight to this particular objection therefore. Contrary to some objectors' views, the evidence before me suggests the bypass could help ease traffic congestion at the northern end of Newport Road and help to improve conditions for pedestrians on the western fringe of the town centre somewhat. These factors however are insufficient to overcome my concern about including elements of the project in the Plan.

10.13.7 As regards Castletown in particular, I heard that this area already suffers from blight due to the Castlefields link. As I perceived it, this area is a distinctive enclave of tight-knit Victorian terrace housing. It is not a conservation area, but from both the unchallenged evidence about its history and architectural qualities and my first hand observations, it seems to me that the area represents an important part of the town's economic and built heritage. To my mind it continues to perform an important role by offering relatively low priced living accommodation in very close proximity to the town centre, sources of employment and public transport links.

10.13.8 I consider the blight which has occurred in this area would be compounded by the effect of the substantial elevated structure which would be required to carry the new road over the railway. The sheer physical impact of the road, together with associated features such as lighting and the traffic, would, in my opinion, have a seriously detrimental effect - directly and indirectly - upon the outlook of the dwellings in Castle View and North Castle Street in particular. I believe it would have an unacceptably adverse impact upon both the living conditions of the local residents and the distinctive character of the locality. I find the concern expressed in these respects well founded.

10.13.9 In the Consultation Draft version of the Plan, the Castlefields Link appears under the heading "Scheme required to implement residential Proposal H5".<sup>1</sup> Given that this proposal is not carried forward to the Deposited Plan, the view that the road scheme should also be omitted carries a certain logic. In addition, besides the effect upon Castletown, the alignment of the route suggests to me that the practical difficulties likely to be encountered as a result of having to cross the West Coast Main Line by a skewed bridge, are likely to cast a strong element of doubt upon the feasibility of the route.

10.13.10 As part of their case in support of the reinstatement of the Castlefields housing proposal, **Tarmac Midlands Housing Division** put forward an alternative scheme. To my mind, this would make crossing the railway less problematic and equally, if not more importantly, would remove the blight upon and threat to Castletown. It would also facilitate the removal of traffic to and from the Castleworks site from this area. Other likely benefits would be the removal of blight from the Castleworks site and the improvement of Doxey Bridge and Doxey Road adjacent to the bridge.

10.13.11 At the inquiry I heard that the highway authority are content with the alternative route. I consider that at a local level it is appreciably more advantageous than the route depicted in the Plan. I find these reasons lend strong support to the objector's proposal. However, because of the wider context within which I consider the Castlefields link must be viewed, I am not satisfied that it would be appropriate to include the scheme in the Plan regardless of the merits of the alternative alignment.

10.13.12 Although I recommend further consideration be given to reinstating the housing proposal at Castlefields in the Plan, and am mindful that a link to Doxey Road will be required, I do not consider this is sufficient to warrant the retention of the link

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<sup>1</sup> In the Consultation Draft the housing allocation at Castlefields is identified as Proposal H5.

road as a specific proposal. My view is that if the land at Castlefields is allocated for housing, the road could be dealt with separately as an access to the housing scheme rather than as an integral part of the town's primary highway network.

10.13.13 In the light of the foregoing, notwithstanding the importance attached to the Town Centre Western Bypass and, by implication its constituent parts, I am not satisfied that that the three link road proposals are appropriately included in the Plan.

### **Recommendations**

10.13.14 *I recommend that the Plan be modified by the deletion of:*

- i. The Rowley Link - M9 III (6);*
- ii. The Castlefields Link - M9 III (7);*
- iii. The Doxey Road/Goal Square Link - M9 III (8).*

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### **10.14 M9 III (10) - THE BARNES ROAD IMPROVEMENT/HIGHFIELDS LINK**

**Objection Nos:** 0407/36 R Oldacre, 0531/02 M Dudley; 0945/02 Castle Church PC; 0946/13 A G Simmons; 1499/01 Stafford FOE.

### **The Objections**

- The proposal will increase the problem of traffic in Sundown Drive.
- Incompatibility with Protected Open Space status of the land.
- All road schemes should be cancelled.

### **Conclusions**

10.14.1 It seems to me that this proposal is essentially a local measure which should afford relief to estate roads in the vicinity. It is conceivable that some motorists may find Sundown Drive a more attractive route, but I am not satisfied that this consideration is sufficient to outweigh the likely local benefits of the scheme.

10.14.2 As the concept of Protected Open Space is an important part of the Plan's strategy, I find it somewhat surprising that a proposal of this nature should fall within such an area. As I see it, the proposal does not sit comfortably with the land's designation. I have read that this scheme was prepared some time ago and has been declared on land charges searches. I am also mindful that it is included in the non-statutory Stafford Area Local Plan. Nevertheless, the Council accept that there is no known date for its implementation. This adds to my concern about the project; the prospect of the scheme being implemented seems highly uncertain. There is no evidence which suggests that it is intended to commence work within about 10 years or so.

Despite the history of this project, I am not satisfied that it is sufficiently advanced to warrant being included in the Plan.

### **Recommendation**

10.14.3 *I recommend that the Plan be modified by the deletion of The Barnes Road Improvement/Highfields Link M9 III (10).*

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### **10.15 M9 III (11) - NEW LINK ROAD FOR THE PROPOSED NEW M6 JUNCTION TO THE A34**

**Objection Nos:** 0407/37 R Oldacre; 0554/28 CPRE.

### **The Objections**

- All road schemes should be cancelled.
- Inappropriate scheme because of linkage to the Creswell Industrial site.

### **Conclusions**

10.15.1 CPRE's opposition to this scheme, as expressed in the duly made objection, is based on the premise that it is linked to Proposal E2 which they oppose. In response to the Suggested Changes, this objector accepts that the road proposal partly emanates from a "need" to re-site M6 Junction 14 in association with the motorway widening project.

10.15.2 I am unable to concur with the view that the proposed route is too circuitous. In my opinion it would offer a direct link to the A34, thereby providing easy access between the motorway and Stone as well as the northern parts of Stafford. I am not satisfied that the alternative suggestion, a link between the new M6 junction and Redhill roundabout, would be particularly advantageous. I consider the motorway widening scheme, to which this proposal is directly related, is sufficiently advanced to warrant the safeguarding of the route as proposed in the Plan.

### **Recommendation**

10.15.3 *I recommend that no modification be made to the Plan.*

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### **10.16 POLICY M10 - HIGHWAY DESIGN**

**Objection Nos:** 0946/08 A G Simmons; 1472/02 M D Underwood; 1473/02 J A Underwood; 1499/02 Stafford FOE.

### **The Objections**

- Need to avoid disruption upon neighbourhoods or communities;

## Conclusions

10.16.1 The evidence by **A G Simmons** and **Stafford FOE** concerning the socially disruptive effect of traffic was not challenged at the inquiry. In my view, the responses that the road proposals in the Plan are unlikely to have such an effect, and that PPG13 is silent on this point, are not sufficient to negate the value of the additional consideration suggested by these objectors. Noting that a similar provision is already included in the approved Structure Plan, [Policy 44 (h)] my opinion is that it would be a useful addition to the policy.

10.16.2 The Council accept the concern about the suggested change to clause (g) and are not opposed to the removal of the words "*and viable*". To my mind they are not necessary.

10.16.3 Although **M D Underwood** and **J A Underwood** address objections to this policy, they form part of a wider concern directed at the SEBP proposal. No particular criticism of Policy M10 is advanced.

## Recommendation

10.16.4 *I recommend that Policy M10 of the Plan be modified by:*

- i. the amendment to clause (g) as set out in the Suggested Changes, but subject to the deletion of the words "and viable";*
- ii. the insertion of an additional clause, "the avoidance of disruption to a neighbourhood or community".*

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## 10.17 POLICY M11 - DEVELOPMENT OF LAND: HIGHWAY CONSIDERATIONS AND DEVELOPER CONTRIBUTIONS

Objection Nos: 0388/16 HBF; 1429/08 DOE.

### The Objections

- Need for greater clarity regarding developer obligations.

## Conclusions

10.17.1 In response to these objections, an amended clause (c), the gist of which is very similar to the alteration sought by the **HBF**, is put forward in the Suggested Changes. This makes it clear firstly, that contributions will only be sought if the need arises from the development proposed, and secondly, that in negotiations regard will be had to Government policy guidance. In my opinion this amendment adds greater clarity to the Plan and represents a satisfactory response to the objections.

10.17.2 While the **HBF** also object to clause (d), it seems to me that the objector's real concern lies with the actual parking standards. I deal with this separately at 10.21. I do not consider a requirement that sufficient parking be provided is unreasonable. As the policy is directed the traffic implications of development, I do not consider that cycleways need to be mentioned expressly.

### **Recommendation**

10.17.3 *I recommend that Policy M11 be modified in accordance with the Suggested Changes.*

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## **10.18 PARKING AND SERVICING POLICY M12 - SHOPPING, TOWN AND SETTLEMENT CENTRES POLICY M13 - OTHER LOCATIONS**

**Objection Nos:** 0407/38-39 & /41 R Oldacre; 0946/04-07 & /50 A G Simmons; EN1429/88 DOE; 1498/65, 1499/05-08 Stafford FOE.

### **The Objections**

- Lack of clarity regarding status of parking standards.
- Need for compatibility with national policy guidance.
- Need to relate parking provision to road capacity or to alternative forms of transport to the motor car.
- Need for parking provision outside town centres.

### **Conclusions**

10.18.1 The two Policies which deal with parking, M12 and M13, contain references to the Council's parking standards, but the actual standards are contained in a separate appendix document. While the preamble to the latter notes that it is intended to be incorporated into the main body of the Plan, a measure which I support, no such reference is made in the Plan. In my view the Plan should encompass both the parking policies and the standards which should be clearly cross-referenced.

10.18.2 A reference to keeping parking standards under review, to be added to the Appendix Document, is included in the Suggested Changes. In my opinion this is of sufficient import to merit inclusion in the main body of the Plan as **DOE** suggest.

10.18.3 While clause (b) of Policy M12 is directed at the loss of public parking spaces, my view is that it is not consistent with the spirit of the guidance in paragraph 4.9 of PPG13 and ought to be deleted. Likewise, I find clause (c) out of kilter with both the advice in paragraph 4.10 of the PPG and the suggested change to the appendix concerning contributions in lieu of parking provision. I concur with the Council's view that this also needs rectifying.

10.18.4 I accept that standards for Class A uses in town centres are reduced, and I am mindful that Structure Plan Policy 47 states car parking should not be provided in

locations that will cause undesirable overloading on the road network. Nonetheless, the standards in the Plan are not expressed as a range of maximum and operational minimum amounts as PPG13 advises. In my view they ought to reflect this guidance and reference should also be made to the importance of keeping standards to the operational minimum.

10.18.5 In essence, the objections by **A G Simmons**, **Stafford FOE** and **R Oldacre** seek a more robust form of control over parking provision with a view to discouraging journeys by car and encouraging other modes of movement which consume less energy and pose less of a threat to the environment.

10.18.6 PPG13 notes that the availability of car parking has a major influence on the choice of the means of transport. The text in the Movement and Transportation Chapter acknowledges that parking can add to traffic generation and congestion and affect the relative attractiveness of bus usage. It also refers to the need to achieve a balance between the demands of motorists and those using other modes of transport. While I see no reason to take issue with this, it seems to me that these comments are not fully reflected in the policies. Moreover they appear to conflict with the text in the Shopping Chapter.

10.18.7 While I am satisfied with the Suggested Change to the reference to parking under the heading 'Environmental Improvements in Town Centres', the Shopping Chapter contains other references to securing the provision of additional town centre parking. At the inquiry the Council's witness accepted the inconsistency with the Movement Chapter; further alterations which in my view would overcome this problem are considered at 8.10.1 to 8.10.3.

10.18.8 While the payment of commuted sums where on-site parking cannot be provided is highlighted, this is directed solely at the provision of more parking. In my view this does not sit comfortably with the stated aim to promote alternative forms of transportation to the car, or with the suggestion elsewhere in the text that control of parking provision could make use of the motor car less attractive.

10.18.9 The Suggested Changes include additional text, based upon PPG13, to be added to the Appendix Document which would facilitate commuted payments towards measures other than parking. In my view this is also a matter of sufficient import to warrant inclusion in the main body of the Plan. In so saying however, I consider that the context in which this change would appear ought to be made clearer. The additional policy which **A G Simmons** and **Stafford FOE** suggest would be of assistance in this respect. I see much merit in including its gist, namely the need to discourage congestion so that car use remains within the capacity of the road infrastructure, and to discourage car use in favour of other modes of transport which use less energy, in the Plan. However as I consider the suggestions represent aims rather than clear land use guidance, they would be more appropriate as supporting text.

10.18.10 The measures **R Oldacre** proposes are, by his admission, radical. Given the traffic problems highlighted in the Plan and the evidence about the effects of traffic upon living conditions and health, I fully appreciate why they are put forward. However while these matters raise serious concerns, my view is that items such as the payment of subsidies into a public transport fund, and the eventual sale of town centre car parks to

provide more funds, go beyond the scope of the Plan. As I see it, a measure such as the provision of more parking outside the town centre needs to be part of a carefully co-ordinated transport strategy. In the absence of any firm land use based proposals in this respect, I consider it would be premature to incorporate this into the Plan.

## **Recommendation**

10.18.11 *I recommend that the Plan be modified by:*

- i. the incorporation of the Development Control Policy Appendix Document "Parking Standards and Guidance" into the main body of the Plan;*
- ii. the insertion of clear cross-referencing between Policies M12 and M13 and the supporting text and the related Appendix Document;*
- iii. the incorporation of a reference to keeping parking standards under review into the supporting text;*
- iv. the incorporation of a reference to the importance of ensuring parking standards in general are kept to an operational minimum;*
- v. the expression of the parking standards as a range of maximum and minimum operating requirements;*
- vi. the deletion of clause (b) from Policy M12;*
- vii. the deletion of the last 3 lines of clause (c) from Policy M12 and the substitution therefor by "contributions to measures to assist public transport or walking and cycling or additions to public parking elsewhere, as appropriate";*
- viii. the inclusion of additional supporting text to Policies M12 and M13 incorporating the gist of the additional policy put forward in objection references 0946/04-07 and 1499/05-08;*
- ix. the amendments to the sections headed "'Introduction" and "Town Centres and Commuted Sums" in the Development Control Policy Appendix Document "Parking Standards and Guidance", in accordance with the Suggested Changes.*

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## **10.19 PARKING STANDARDS AND GUIDANCE**

**Objection Nos:** 0027/02 Woolwich Building Society; 0200/07 Whitbread plc; 0388/17 HBF; 0390/06 The Haywood Society; 0863/11 SCC; 0942/02-03 SCC (Highways); 1429/06 DOE.

### **The Objections**

- Need to acknowledge scope for flexibility in the application of standards.
- Need to amend basic requirements and provision for car/vehicle showrooms.
- Standards should be the same for A1 and A2 uses.
- The standard for public houses and licensed bars is excessive.
- Unnecessary and excessive residential development standards.
- Need to provide off-street parking in villages.
- Inappropriate application of a parking standard to schools.

## Conclusions

10.19.1 In the Suggested Changes the word "*must*" is to be replaced by "*should*" as advocated by **DOE**. To my mind this is a satisfactory acknowledgment of the need to apply standards flexibly. The Suggested Changes also include the amendments concerning basic requirements and car and other vehicle showrooms sought by **SCC (Highways)**. I am content with these too.

10.19.2 While I acknowledge that the standards for A2 uses and public houses are used by other local authorities, I do not consider this is sufficient justification for their inclusion in a Plan specific to Stafford Borough. In my experience most A2 uses, particularly those in town centres or local shopping areas, operate in a very similar manner to shops. Accordingly, therefore, I am not satisfied that different parking standards are needed.

10.19.3 I am concerned generally that the application of demanding standards could encourage more rather than less journeys by car. As regards public houses and bars, my view is that the Council's earlier standard of one space per 5 m<sup>2</sup> is more than adequate. Contrary to the Council's view, I consider the submission that the cumulative application of the full standards to facilities in hotels is unduly onerous is well founded. To my mind this is likely to involve a high degree of duplication with the requirement for provision for guests. In my opinion this matter warrants further consideration.

10.19.4 The accompanying text acknowledges that in some circumstances it may be impossible or undesirable to require full provision to be made and cites the viable use of a listed building as an example. I find this provides the flexibility sought by **Whitbread plc** adequately. Although not a response to an objection, I take no exception to the Council's suggested amendment to the standard for restaurants and cafes.

10.19.5 In the Suggested Changes, the standards for dwellings are set out with greater clarity. In my view this meets the **HBF**'s concern in this respect, satisfactorily. While the Council contest this objector's submission regarding owner occupied accommodation for the elderly, this is not backed up by any evidence. I think this is a matter which warrants further consideration too; I see some merit in lowering the requirement for residents while increasing it for visitors as the **HBF** suggest.

10.19.6 Whether or not the application of parking standards to schools is *ultra vires* as **SCC** submit, is a matter of law and as such is for the Borough Council to determine. Nonetheless, I offer my view on the question. While the provision of schools is subject to the 1944 Education Act and associated regulations, such development is not immune from planning controls. It seems to me therefore that in assessing the planning merits of schemes for schools, the provision of parking and/or the

implications of not providing it, as the case may be, are legitimate material considerations. I see no distinction between these factors and other matters such as the design and appearance of buildings and the relationship of the proposals to neighbouring properties.

10.19.7 I accept that financial constraints and the need to make the best use of limited resources places the local education authority in something of a quandary. Nevertheless, in my view, the application of a parking standard under the aegis of the Local Plan, in furtherance of a planning consideration, cannot reasonably be regarded as a usurpation of the powers conferred by the Education Act as SCC contend.

10.19.8 There may well be merit in the formulation of a common approach nationally, but as my remit is solely to report to the Borough Council, I must decline the invitation to make representations to the Secretaries of State involved. In the absence of a national standard I see nothing untoward in incorporating a local one in the Plan. Indeed, while I have been acquainted with various standards used elsewhere, the figures used in the Plan are not challenged. In my view the standards for staff and 'bona fide' visitors, are reasonably related to the normal operation of a school.

10.19.9 However it seems to me that the link between the operation of a school and setting down space is much more tenuous. I acknowledge a good number of children are taken to school by car and the procedure of setting them down and collecting them can give rise to problems. Nevertheless, in my opinion it is unreasonable to require space to be set aside within school curtilages for such a purpose as a matter of course. Similarly, as special events are, by definition, not the norm, I do not consider it reasonable to require provision to be made for such occasions.

10.19.10 The objection by **The Haywood Society** is linked to a general concern about traffic in the rural areas. In my view the provisions of Policies M11 and M12 and the parking standards provide a reasonable basis for ensuring that, where appropriate, off-street parking is provided in association with development. I am not satisfied that further modifications are needed.

### **Recommendation**

10.19.11 *I recommend that the Plan be modified by:*

- i. the amendments to the text under the headings "Operational Parking", "Non-Operational Parking" and "Parking Standards" in accordance with the Suggested Changes;*
- ii. the deletion of the separate parking standard for Class A2 uses;*
- iii. under "Restaurants and Cafes", the deletion of "one space per 4 m<sup>2</sup>" and the substitution therefor by "one space per 5 m<sup>2</sup>";*
- iv. under "Public Houses and Licensed Bars", the deletion of "one space per 3 m<sup>2</sup>" and the substitution therefor by "one space per 5 m<sup>2</sup>";*
- v. under "Residential Dwellings", the amendments to the requirements for "Residential Dwellings" in accordance with the Suggested Changes;*

*vi. under "Non-residential Institutions" (iii), the deletion of all the requirement after the word "visitors" in the third line.*

**AND THAT**

*Further consideration be given to amending the standards:*

*(a) for hotels with a view to avoiding possible duplication with the requirement for provision for guests;*

*(b) for owner occupied elderly persons' housing.*

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## **10.20 COMMERCIAL AND HEAVY GOODS VEHICLES**

**Objection No:** 1429/07 DOE.

### **The Objection**

- Lack of clarity regarding the consideration of planning applications.

### **Conclusions**

10.20.1 In response to this objection additional supporting text, which meets the objector's concern, is put forward in the Suggested Changes. I am content with this.

### **Recommendation**

10.20.2 *I recommend that the Plan be modified by the insertion of additional supporting text in accordance with the Suggested Changes.*

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## **10.21 POLICY M14 - MOTORWAY SERVICE AREAS**

**Objection Nos:** 0526/06 Stafford Historical and Civic Society; 0527/02 W J Read; 0906/04 The Biotechnology and Biological Sciences Research Council; 0907/01 Granada Hospitality Limited; 0940/34 NRA.

### **The Objections**

- Need for compatibility with Government advice.
- Need for adequate provision for drainage.
- The suitability of the Doxey motorway maintenance depot should be acknowledged.

## Conclusions

10.21.1 To a certain extent these objections have been overtaken by events by virtue of the consent granted for an MSA alongside the northbound carriageway of the M6 to the west of Stone, the implementation of which had commenced before the closure of the inquiry. As the objections remain extant however, I deal with them below.

10.21.2 According to Department of Transport Roads Circular 1/94, exceptions to the 15 mile minimum distance between facilities may be agreed. It seems that the very fact that the Plan includes a policy concerning MSAs represents an implicit acceptance of this advice. Because of this, I am not satisfied that this needs to be made explicit in the supporting text as **The Biotechnology and Biological Sciences Research Council** and **Granada Hospitality Limited** suggest.

10.21.3 I do not take issue with the need to avoid long journeys by staff and service vehicles, but do not agree with the above objectors' submissions that criterion (c) needs to be amended. I find this part of the policy consistent with the advice in paragraph 8 of Annex A of PPG13. As the PPG also indicates that there is no change in national planning policy, I see nothing untoward in the desire to avoid intrusion into the countryside (criterion (g)). To my mind the introduction of the words "*where possible*" in the Council's Suggested Changes provide a reasonable degree of flexibility.

10.21.4 I consider the changes to the supporting text meet the other concerns raised by the two objectors identified above satisfactorily. Likewise, I find the proposed addition of a clause regarding drainage represents a reasonable response to the submission made by **NRA**. As national advice indicates that the initiative in identifying MSA sites lies with the private sector, I do not find the Plan lacking because no site is identified. To my mind, the policy would not preclude the consideration of a location such as Doxey, as the **Stafford Historical and Civic Society** and **W J Read** advocate.

## Recommendation

10.21.5 *I recommend that the Plan be modified by the amendment of Policy M14 and its supporting text in accordance with the Suggested Changes.*

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## 10.22 OMISSION - MOVEMENT AND EDUCATION

**Objection Nos:** 0946/15 A G Simmons; 1498/94 Stafford FOE; 2021/09 Gnosall Best Kept Village Association.

### The Objections:

- Need to reduce the use of cars to transport children to school.

## Conclusions

10.22.1 In essence, the concern expressed by the objectors stems from traffic movements generated by the transportation of schoolchildren to and from school. **A G Simmons** and **Stafford FOE** seek the inclusion of a policy which aims to reduce the use of cars to transport children. The **Gnosall Best Kept Village Association** look to a change in educational policy to disseminate educational establishments so that children would not have to be transported into Stafford.

10.22.2 Both measures would be consistent with the objective of reducing the need to travel, especially by car. However, in my view, the matters raised by the objectors go beyond the ambit of a land use plan. Because of this, I do not consider it would be appropriate to include policies on the lines of those suggested by the objectors in the Plan.

### **Recommendation**

10.22.3 *I recommend that no modification be made to the Plan.*

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## **10.23 OMISSION - NON-VEHICULAR MOVEMENT NETWORKS**

**Objection Nos:** 0946/16 A G Simmons; 1498/93 Stafford FOE.

### **The Objections**

- Need for a policy for the creation of local safe route networks.

### **Conclusions**

10.23.1 In my view the concept of providing a network of safe routes has much to commend it, not least for the reasons given by the objectors. However as I see it, the policy they propose is more of a statement of intent than a means of guiding and controlling land use. I am not satisfied that any significant advantage would accrue from its inclusion in the Plan.

### **Recommendation**

10.23.2 *I recommend that no modification be made to the Plan.*

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## **10.24 OMISSION - SUPPLEMENTARY GUIDANCE FOR PEOPLE WITH SPECIAL MOBILITY NEEDS**

**Objection Nos:** 0946/17 A G Simmons; 1498/92 Stafford FOE.

### **The Objections**

- Need for firm commitment to publication of guidance.

### **Conclusions**

10.24.1 I fully appreciate the objectors' desire to see a firm commitment to the early production of the supplementary guidance referred to in the text, encapsulated in the Plan. Nevertheless I do not find the absence of such an assurance makes the Plan unacceptably deficient in this respect. In my view the policy advocated by the objectors is a statement of intent rather than a tool for guiding land use. I do not consider its inclusion in the Plan would be particularly advantageous.

10.24.2 As the Council point out, the Suggested Changes to the Plan include a number of measures which provide for people with special mobility needs. Given this additional coverage, I rather doubt whether the preparation of additional guidance is likely to prove necessary. However as I see this as a matter for the discretion of the Council, I make no recommendation thereon.

### **Recommendation**

10.24.3 *I recommend that no modification be made to the Plan.*

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### **10.25 OMISSION - VEHICLE IMPACT REDUCTION POLICY**

**Objection Nos:** 0946/14 A G Simmons; 1498/95 Stafford FOE.

### **The Objections**

- Need to reduce the environmental impact of and use of cars.

### **Conclusions**

10.25.1 The objectors seek the inclusion of a policy to encourage employers to reduce the use of cars by their employees. I accept this would be consistent with the aim of reducing the need to travel, especially by car. However, in my view, the suggested means of achieving a reduction in car usage, which include fiscal measures, the use of unleaded petrol and catalytic converters, together with the provision of cycle sheds and clothes drying facilities, fall well outside the ambit of the Plan. I do not consider it would be appropriate to include a policy of this nature in the Plan.

### **Recommendation**

10.25.2 *I recommend that no modification be made to the Plan.*

### **10.26 OMISSION - TRAFFIC CALMING IN VILLAGES**

**Objection Nos:** 0390/03-06 The Haywood Society.

### **The Objections**

- Need for traffic calming measures in villages.

### **Conclusions**

10.26.1 I consider the concern expressed by the objector is covered adequately in the Plan. To my mind, Policy M4 and its supporting text, together with the related modifications proposed in the Suggested Changes, provide a reasonable basis for the introduction of traffic calming measures where appropriate. As the precise measures to be adopted would probably be dependent upon the particular local circumstances, I am not satisfied that further details need to be included in the Plan. Likewise, as the implications of traffic generation can be a material consideration in the determination of planning applications, I see no compelling need for a specific policy in this respect either.

### **Recommendation**

10.26.2 *I recommend that no modification be made to the Plan.*

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## **10.27 OMISSION - PUBLIC TRANSPORT/INTEGRATED TRANSPORT POLICIES**

**Objection Nos:** 0394/21 Rural Development Commission, 0407/40 R Oldacre; 1997/02 D R Scofield; 2018/02 & /25 Berkswich PC.

### **The Objections**

- Need for an integrated transportation policy.

### **Conclusions**

10.27.1 I acknowledge that there is a close interrelationship between transportation and land use. Moreover, it appears to me that the emerging transportation strategy for Stafford could provide a basis for a more integrated approach. Nevertheless, given that the Plan focuses upon land use, it seems to me there are limitations upon how far it can go as an expression of transportation policy.

10.27.2 For instance, while matters such as subsidies and grants can be important elements of an overall transportation strategy, I do not consider the Plan is the appropriate channel for the promotion of such measures. The same view applies to the question of the diversion of resources which **R Oldacre** advocates. In my opinion, taking my recommended modifications into account, the series of aims and specific proposals and policies contained in the Plan, go as far as can reasonably be expected in this respect. I am not satisfied that an additional policy relating to the development of

integrated strategies for transport infrastructure, as both **Berkswich PC** and the **Rural Development Commission** suggest, would materially improve the efficacy of the Plan.

### **Recommendation**

10.27.3 *I recommend that no modification be made to the Plan.*

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### **10.28 OMISSION - FOOTPATHS**

**Objection Nos:** 0405/01 P Collard; 0526/07 Stafford Historical and Civic Society; 0527/05 W J Read; 0946/35 A G Simmons; 1498/74 Stafford FOE.

### **The Objections**

- Failure to acknowledge footpaths.
- Lack of commitment to strategic footpath review.

### **Conclusions**

10.28.1 The Council acknowledge that a stretch of footpath has been omitted from the Norbury Inset Map. An amendment, which in my view rectifies this omission satisfactorily, is included in the Suggested Changes.

10.28.2 As regards the question of extending the footpath on the north bank of the River Sow in the town centre which the **Stafford Historical and Civic Society** and **W J Read** suggest, I find the reluctance to incorporate this in the Plan somewhat puzzling. As I see it, the inclusion of this proposal in the Council's capital programme, represents a degree of intent sufficient to warrant its incorporation in the Plan, even if the implementation of the project is dependent upon the co-operation of other parties.

10.28.3 I appreciate that the absence of a firm date for a review of the footpath network creates an element of uncertainty. However, to my mind this is not a matter which needs to be made explicit in the Plan and the absence of this information does not materially impair its efficacy.

### **Recommendation**

10.28.4 *I recommend that the Plan be modified by:*

- the amendment to the Norbury Inset Map as shown in the Suggested Changes;*
- the inclusion of the extension of the footpath on the north bank of the River Sow in the town centre as a proposal.*

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**10.29 OMISSION - RAIL TRANSPORT**

**Objection Nos:** 0407/08 & /42-43 R Oldacre; 1429/12 DOE.

**The Objections**

- Absence of proposals and policies regarding rail travel.
- Need to promote rail travel.

**Conclusions**

10.29.1 Given the rail links which the Borough enjoys and the acknowledgment of the need to reduce journeys by car in the Suggested Changes, it is perhaps surprising that policies and proposals concerning rail travel and rail related facilities are absent from the Plan.

10.29.2 I am mindful that PPG12 advocates the inclusion of proposals and policies related to the transport network within development plans. Nevertheless, it seems to me that the degree to which rail-related proposals are incorporated into the Plan is essentially a matter for the discretion of the plan making authority. The benefits of interchange facilities at Rickerscote form part of a wider case supporting the release of land for development there. Similarly, **R Oldacre** advocates the provision of a station at Baswich and the re-use of the disused railway from Stafford Common to Stafford station. However while all these matters may well merit further consideration, my opinion is that suggestions do not offer sufficient certainty to warrant being included in the Plan.

10.29.3 I find the supporting text is essentially supportive of rail travel. I do not consider that it needs to be strengthened in the manner advocated by **R Oldacre**. In particular, my view is that the inclusion of a request that finance be apportioned in a particular way goes beyond the remit of the Plan.

10.29.4 In response to **DOE's** objection, the Council confirm that the Plan contains no firm proposals for new stations or interchange facilities. In my opinion, greater clarity would be imparted to the Plan if a statement to this effect was included.

**Recommendation**

10.29.5 *I recommend that the Plan be modified by the insertion of additional supporting text confirming there are no current proposals for new stations or interchange facilities.*

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**10.30 GNOSALL: CAR PARKING**

**Objection No:** 2021/07 Gnosall Best Kept Village Association.

## **The Objection**

- Need for additional parking provision in the centre of Gnosall.

## **Conclusions**

10.30.1 The objector suggests that land to the east of Brookhouse Road, known as Baker's Field, be used for parking. The land is identified as Protected Open Space on the Gnosall Inset Map.

10.30.2 The objection site is well placed in relation to Gnosall's High Street and a scheme to provide parking could be a precursor for measures to make the centre of Gnosall pleasanter for shoppers. However, it seems to me that whether or not parking should be provided is very much a matter for local determination. As there is no evidence of any firm intent to make such provision in the foreseeable future, I do not consider it would be appropriate to earmark this site in the Plan, irrespective of its merits. The protection afforded to the land in question by virtue of Policy ED23 would not preclude the consideration of the possibility at a future date.

## **Recommendation**

10.30.3 *I recommend that no modification be made to the Plan.*

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## **10.31 BRADLEY: TRAFFIC PROBLEMS**

**Objection No:** 0554/12 CPRE.

## **The Objection**

- Need for a policy concerning traffic generated by new or expanded commercial enterprises.

## **Conclusions**

10.31.1 While this objection relates solely to Bradley and reference is made to a specific enterprise, it seems to me that this is an issue applicable throughout the plan area. In so saying however, as the implications of traffic generation can be a material consideration in the determination of planning applications, I see no compelling need for a specific policy in this respect.

## **Recommendation**

10.31.2 *I recommend that no modification be made to the Plan.*

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