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Sustainability Appraisal (SA) of the Stafford Borough Local Plan 2020-2040

Interim SA Report

October 2022

Quality information

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1 Introduction

1.1 Background

1.1.1 AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Stafford Borough Local Plan 2020-2040. Once adopted, the local plan will set the strategy for growth and change for the borough up to 2040, allocate sites to deliver the strategy and establish the policies against which planning applications will be determined.

1.1.2 SA is a mechanism for considering and communicating the effects of an emerging plan, and alternatives, with a view to minimising adverse effects and maximising the positives. SA is required for local plans.[1]

1.2 SA explained

1.2.1 It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004.

1.2.2 In-line with the Regulations, a report (known as the **SA Report**) must be published for consultation alongside the draft plan that essentially appraises "the plan, and reasonable alternatives".[2] The SA report must then be taken into account, alongside consultation responses, when finalising the plan.

1.2.3 More specifically, the SA Report must answer the following **three questions**:

- What has Plan-making / SA involved up to this point?
  - including around consideration of 'reasonable alternatives'
- What are the SA findings at this stage?
  - i.e. in relation to the draft plan
- What are next steps?

1.3 This Interim SA Report[3]

1.3.1 At this current stage of the plan-making process the Council is consulting on an early draft version of the local plan (the 'preferred options' version) under Regulation 18 of the Local Planning Regulations.

1.3.2 This Interim SA Report is therefore published with the intention of informing the consultation and subsequent preparation of the final draft ('proposed submission') version of the plan.

Structure of this report

1.3.3 Despite the fact that this is an 'Interim' SA Report, and does not need to provide the information required of the SA Report, it is nonetheless helpful to structure this report according to the **three questions** above.

1.3.4 Before answering the first question, there is a need to further set the scene by setting out:

- the plan's aims and objectives; and
- the scope of the SA.

Commenting on this report

1.3.5 This report can be referenced as part of comments on the draft plan and/or comments can be made specifically on any part of this report. Further guidance is provided below, including the next steps section.

[1] Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (NPPF, 2021). The Town and Country Planning (Local Planning) Regulations 2012 require that an SA Report is published for consultation alongside the 'Proposed Submission' plan document.
[2] Regulation 12(2)
[3] See **Appendix I** for further explanation of the regulatory basis for answering certain questions within the SA Report, and a 'checklist' explaining more precisely the regulatory basis for presenting certain information.

2 The plan scope

2.1 Introduction

2.1.1 The aim here is to briefly introduce: the plan area (drawing text from the plan document, and mindful that spatial issues and opportunities are discussed in more detail elsewhere in this report); the legislative and policy context; and the objectives that are in place to guide plan preparation (the 'plan scope').

2.2 The plan area

2.2.1 Stafford Borough is centrally located in the County of Staffordshire within the West Midlands region. It lies between the North Staffordshire conurbation to the north, comprising Stoke-on-Trent and Newcastle-under-Lyme, and the Birmingham City Region to the south.

2.2.2 The borough is predominantly rural in nature, with two main town centres - Stafford and Stone - that act as hubs to the rural hinterlands. The borough is very well connected with excellent transport links to the rest of the country. Although the borough is relatively self-contained, there are key economic linkages with the North Staffordshire conurbation and the Birmingham City Region.

2.2.3 Stafford town is at the heart of the borough, and is very well connected by road and rail, with HS2 set to reduce the journey time to London to under an hour. With a population of ~66,000 (out of a borough total of ~ 137,900), it is the historic county town and has an expansive retail and leisure offer. Business parks support the local economy, there is also a hospital, an MOD site and also the New Beacon Group education campus (previously Staffordshire University). Recently there has been significant new housing growth on the outskirts of the town alongside new community and green infrastructure.

2.2.4 Stone is an attractive market town to the north of the borough which has expanded in size in recent years (10 around 16,500 residents). It hosts a large and popular business park and has a bustling town centre, linked to the Trent and Mersey Canal, and River Trent. A new state of the art leisure centre has recently been built and there are proposals for extensive play and recreational facilities at Westbridge Park.

2.2.5 The other larger settlements across the borough include Barlaston, Blythe Bridge, Eccleshall, Gnosall, Great Haywood, Haughton, Hixon, Little Haywood and Colwich, Meir Heath / Rough Close, Weston, Woodseaves and Yarnfield. There are also numerous other small villages and hamlets, including some that benefit from relatively good connectivity to a higher order settlement.

2.2.6 Stafford and Stone are strongly associated with river and transport corridors, as are a large proportion of the borough's other settlements. Outside of these corridors much of the area is intensively farmed agricultural land, interspersed with rural settlements and patches of valued habitat. The north east extent of the borough is a notably raised landscape, with a high point at Meir Heath, as is the Cannock Chase Area of Outstanding National Beauty (AONB) at the borough's south east extent.

2.2.7 There are four international important Special Areas of Conservation (SACs) within or intersecting the borough boundary, one of which is also designated as a Ramsar site on account of internationally important wetlands, plus there are two further sites designated as Ramsar only. All of these sites are also designated nationally as Sites of Special Scientific Interest (SSSIs), and there are several further sites designated as SSSI.

2.2.8 The borough also intersects two areas of Green Belt, specifically those designated to contain the growth of the North Staffordshire conurbation and Birmingham, although the Birmingham (West Midlands) Green Belt, is also almost entirely designated as AONB, such that there is very limited potential for growth. The North Staffordshire Green Belt designation, in the north of the borough, is a consideration for the local plan, mindful that Green Belt can be released through local plans only in 'exceptional circumstances'.

2.2.9 The borough has a rich historic environment, for example Stafford, Stone and many of the rural villages have historic cores which are designated as Conservation Areas. In addition, Trentham Gardens, Sandon Park, Shugborough Park and the German Military Cemetery on Cannock Chase are designated as Historic Parks and Gardens, and the several canals passing through the borough are valued heritage assets.

2.2.10 Stafford Borough has a strong economy. Unemployment rates are lower than the national average; 4% compared to 5.4% in the West Midlands and 5% nationally. Skill levels are high with 53.4% of the working age residents having degree-level skills or higher, and average wages are significantly higher than county, regional and national levels. The majority of the borough has low levels of deprivation, with the exception of some areas of Stafford town including Highfields and Western Downs, Manor and Penkside.

2.2.11 The area is very attractive to inward investors due to its central location and transport links, availability of skilled labour and well located employment sites. New strategic employment sites are being taken up at Stafford and Stone, including Redhill Business Park, the extension of Beacon Business Park and Meaford. This is helping to offset past trends of a declining manufacturing sector.

2.2.12 The local plan will need to support employment growth issues and opportunities, alongside issues and opportunities relating to regeneration and housing needs. In respect of regeneration, there is a focus on Stafford town centre and the Stafford Station Gateway, to the west of the town centre, where there is an established opportunity to provide a new business and commercial district, a new entrance to Stafford station, and residential areas. In respect of housing needs, affordability ratios (average income to house price) are lower in the borough (6.82) than England as a whole (8.0). However 6.82 is still concerning and the affordability ratio is increasing over time. Other key issues relate to the mix of housing, in terms of type and tenure, and also specialist housing, particularly to accommodate an ageing population.

2.3 The plan period

2.3.1 The duration of the plan is for 20 years from 1 April 2020 to 31 March 2040. This is good practice, mindful of paragraph 22 of the National Planning Policy Framework (NPPF), which states: *"Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger scale developments… form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years)..."*. There are two further points to note:

- More than 1,000 homes have already been delivered in the plan period (i.e. since 1 April 2020), known as 'completions', plus other development has planning permission or an existing allocation, collectively known as 'commitments'. As such, the aim of the local plan is to provide for housing growth over-and-above completions and commitments, with the primary mechanism being site allocations.
- Whilst the aim is to allocate sites to meet needs in full for the entire plan period, and with a high degree of delivery certainty, there is a degree of flexibility. The NPPF requires identification of specific 'deliverable sites' for years one to five of the Plan period, and specific, 'developable sites or broad locations for growth', for years 6-10 and where possible, for years 11-15 of the Plan.

2.4 Legislative and policy context

2.4.1 The plan is being prepared under the Town and Country (Local Planning) Regulations 2012, must reflect current Government policy as set out in the NPPF (2021) and must also be prepared in accordance with the Government's Planning Practice Guidance (PPG). In particular, the NPPF requires local authorities to take a positive approach to development, with an up-to-date local plan that meets objectively assessed needs, including local housing needs (LHN), as far as is consistent with sustainable development.

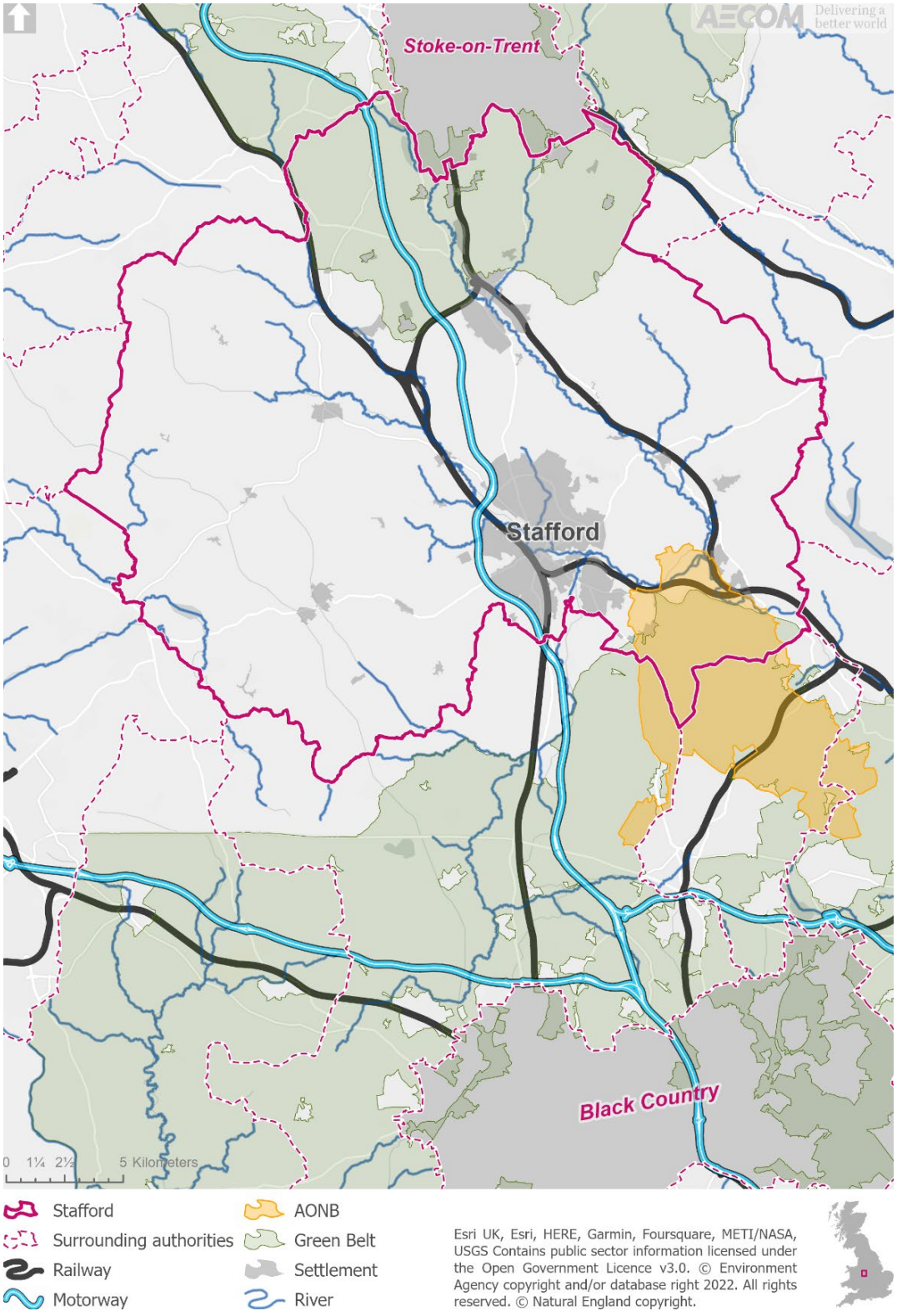
2.4.2 The plan is also being prepared taking account of objectives and policies established by various organisations at national and local levels, in accordance with the Duty to Cooperate established by the Localism Act 2011. For example, context is provided by policy / strategy established by the Stoke-on-Trent and Staffordshire Local Enterprise Partnership (LEP) and Staffordshire County Council (notably in relation to transport, minerals, waste and education). Stafford Borough also cooperates with neighbouring local authorities, including those to the south associated with Greater Birmingham and the Black Country.

2.4.3 Finally, it is important to note that the plan will be prepared mindful of the 'made' neighbourhood development plans (NDPs) for Gnosall (2015), Eccleshall (2016), Colwich (2016), Hixon (2016), Barlaston (2019) and Stone Town (2021); and also the emerging NDPs for several other designated areas. NDPs must be in general conformity with the local plan, which means that made and emerging NDPs may need to be reviewed to bring them into line with the emerging plan; however, it is equally the case that made and emerging NDPs will be a consideration when preparing the local plan.

2.5 Plan objectives

2.5.1 The consultation document presents the following list of objectives: Contribute to **net zero** carbon by ensuring that development mitigates and adapts to climate change; Develop a high value, high skill, innovative and sustainable **economy**; Strengthen our **town centres** through a quality environment and flexible mix of uses; Deliver sustainable **economic and housing growth** to provide income and jobs; Deliver **infrastructure led growth** supported by accessible services and facilities; Provide an attractive place to live and work and support strong **communities** that promote health and wellbeing; Increase and enhance **green and blue infrastructure** and enable greater access to it; and Secure high-quality **design**.

Figure 2.1: Stafford borough in the sub-region, highlighting strategic transport links



3 The SA scope

3.1 Introduction

3.1.1 The scope of the SA refers to the breadth of sustainability issues and objectives that are taken into account as part of the assessment of reasonable alternatives and the emerging plan. It does not refer to the scope of the plan (discussed above) or the scope of reasonable alternatives (discussed below, in Part 1).

3.1.2 The aim here is to introduce the reader to the *broad scope* of the SA. **Appendix II** presents further information; however, it is not possible to define the scope of the SA comprehensively. Rather, there is a need for the SA scope to be flexible and adaptable, responding to the nature of the emerging plan and reasonable alternatives, and the latest evidence-base.

3.2 Consultation on the scope

3.2.1 The Strategic Environmental Assessment (SEA) Regulations 2004 require that: *"When deciding on the scope and level of detail of the information that must be included in the Environmental Report [i.e. the SA scope], the responsible authority shall consult the consultation bodies."* In England, the consultation bodies are the Environment Agency, Historic England and Natural England.[4] As such, these authorities were consulted on the SA scope in 2017.

3.2.2 In 2019 AECOM produced a summary of the responses received to the SA Scoping Report and suggested changes (see Appendix B of the 2020 Initial SA Report). In light of this, the decision was taken to restructure the SA framework somewhat, such that it takes the form of 26 objectives placed under 13 topic headings. No comments were then received on the SA scope through the consultation in 2020.

3.3 The SA framework

3.3.1 The SA framework is presented in full within Appendix II, with the following list of 13 topics at its core:

- Air quality
- Biodiversity
- Climate change adaptation
- Climate change mitigation
- Communities
- Economy and employment
- Health and wellbeing
- Historic environment
- Housing
- Land, soils and waste
- Landscape
- Transport
- Water resources and water quality

3.3.2 This list of topic headings is unchanged from that which was used to structure SA work completed in 2020, with the exception that 'population and communities' has been renamed as 'communities'.

[4] In-line with Article 6(3) of the SEA Directive, these bodies were selected because *"by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes."*

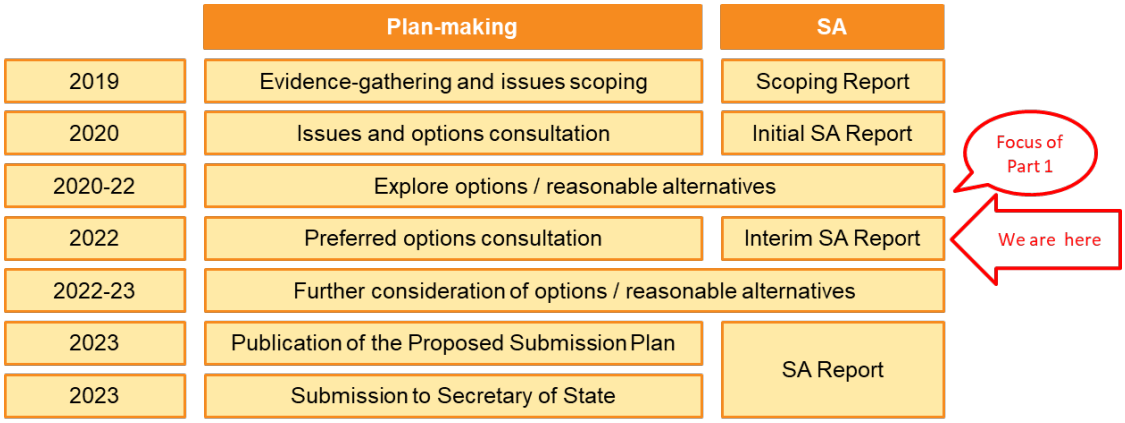
Part 1: What has plan-making / SA involved up to this stage?

4 Introduction to Part 1

Overview

4.1.1 Plan-making has been underway since 2017, with two consultations having been held prior to this current consultation, and one Initial SA Report having been published - see Figure 4.1.

Figure 4.1 Overview of the plan-making / SA process



4.1.2 The focus here, within Part 1, is not to relay the entire 'backstory' of the plan-making /SA process, or to provide a comprehensive audit trail of steps taken. Rather, the aim is to report work undertaken to examine **reasonable alternatives** ahead of the current consultation. Specifically, the aim is to:

- explain the reasons for selecting the alternatives dealt with - see **Section 5**
- present an appraisal of the reasonable alternatives - see **Section 6**
- explain the Council's reasons for selecting the preferred option - see **Section 7**

4.1.3 Presenting this information is in accordance with the regulatory requirement to present an appraisal of 'reasonable alternatives' and 'an outline of the reasons for selecting the alternatives dealt with' within the SA Report (N.B. this is not the SA Report, but aims to present the information required of the SA Report).

What about earlier stages of SA?

4.1.4 A considerable amount of work was presented in the 2020 Initial SA Report, including work to explore reasonable alternatives. In particular, the report presented an appraisal of six mutually exclusive 'strategic options', which varied in terms of both growth quanta and broad distribution.

4.1.5 This work provided an input to the process of defining reasonable alternatives in 2021/22, as reported in Section 5. However, work from 2020 is now out-of-date, such that there is little to be gained from re-presenting it in this report. The 2020 report is available on the local plan evidence base page.

Reasonable alternatives in relation to what?

4.1.6 The legal requirement is to examine reasonable alternatives (RAs) taking into account the objectives of the plan (see Section 2). Following discussion of plan objectives with officers, it was determined appropriate to focus on the spatial strategy, i.e. providing for a supply of land, including by allocating sites and potentially broad areas (NPPF paragraph 68), to meet objectively assessed needs and wider plan objectives. Establishing a spatial strategy is clearly an overarching objective of the local plan.[5]

4.1.7 The decision was made to refer to the spatial strategy alternatives as **growth scenarios**.

[5] It was also considered appropriate to focus on 'spatial strategy' given the potential to define "do something" alternatives that are meaningfully different, in that they will vary in respect of 'significant effects'. This approach is in line with the SEA Regulations, and the PPG is clear that SA "*should only focus on what is needed to assess the likely significant effects of the plan*". There is also nothing to be gained by defining a 'reasonable alternative' that equates to the baseline situation.

What about site options?

4.1.8 Whilst individual site options generate a high degree of interest, they are not RAs in the context of most local plans. Were a local plan setting out to allocate one site, then site options would be RAs, but that is rarely the case, and is not the case for the Stafford Borough Local Plan. Rather, the objective is to allocate *a package* of sites to meet needs and wider objectives, hence RAs must be in the form of alternative *packages* of sites, in so far as possible. Nonetheless, consideration is naturally given to the merits of site options as part of the process of establishing growth scenarios – see Sections 5.3 and 5.4.

Is the focus on housing sites?

4.1.9 Establishing a supply of land to meet housing needs is typically a matter of overriding importance for local plans, and the Stafford Borough Local Plan is no exception. However, local plans are also tasked with meeting wider development needs. This includes needs in respect of employment land, which is a particularly important consideration in the Stafford Borough context, as understood from the Economic and Housing Development Needs Assessment (EHDNA, 2020), which identified a series of growth scenarios that varied in respect of *both* housing growth and jobs / employment land growth. These scenarios were then a focus of appraisal and consultation at the Issues and Options stage (2020).

4.1.10 In this light, reasonable growth scenarios for the Stafford Borough Local Plan must be defined in terms of both housing and employment land. In practice, the discussion presented below is somewhat housing-led, but employment issues/options are discussed throughout, with a summary presented in Section 5.4.

What about other aspects of the plan?

4.1.11 As well as establishing a spatial strategy, allocating sites etc, the local plan must also establish policy on thematic borough-wide issues as well as site-specific policies to guide decision-making at the planning application stage. Broadly speaking, these can be described as development management (DM) policies.

4.1.12 It is a challenge to establish DM policy alternatives that are genuinely reasonable.[6] However, through discussion with Officers it was determined reasonable and appropriate to go through a process to explore this matter, which led to one set of RAs being identified and appraised, specifically in respect of built environment decarbonisation. **Appendices III** presents further information.

Structure of this part of the report

4.1.13 This part of the report is structured as follows:

- **Section 5** – explains a stepwise process leading to the definition of growth scenarios,
  – with supplementary analysis in **Appendices IV and V**;
- **Section 6** – presents a summary appraisal of the growth scenarios, with detail in **Appendix VI**;
- **Section 7** – presents Stafford Borough Council (SBC) Officers' response to the appraisal.

Whose responsibility?

4.1.14 It is important to be clear that: selecting reasonable alternatives is the responsibility of the plan-maker (SBC), with AECOM acting in an advisory capacity; appraising the reasonable alternatives is the responsibility of AECOM; and selecting the preferred option is the responsibility of the plan-maker.

Commenting on this part of the report

4.1.15 Comments are particularly welcomed on:

- the decision to focus on 'growth scenarios' and one DM policy area;
- the growth scenarios and DM policy alternatives selected;
- the appraisal of growth scenarios and DM policy alternatives; and
- Officers' reasons for supporting preferred approaches in light of alternatives.

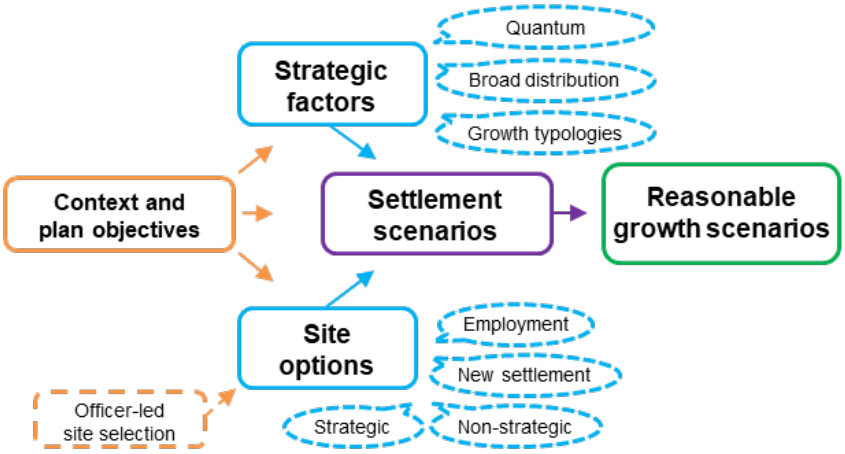
[6] Recalling that to be 'reasonable' alternatives must be meaningfully different, to the extent that it is ultimately possible for an appraisal to confidently differentiate between the alternatives in terms of significant effects.

5 Defining growth scenarios

5.1 Introduction

5.1.1 The aim here is to discuss the process that led to the definition of reasonable growth scenarios.

Figure 5.1: Establishing reasonable growth scenarios



Structure of this section

5.1.2 This section of the report is structured as follows:

- **Section 5.2** – explores strategic issues and options with a bearing on growth scenarios;
- **Section 5.3** – considers individual site options with a bearing on growth scenarios;
- **Section 5.4** – explores growth scenarios for individual settlements within the borough;
- **Section 5.5** – draws upon the preceding sections to define reasonable growth scenarios.

A note on limitations

5.1.3 It is important to emphasise that this section does not aim to present an appraisal of reasonable alternatives. Rather, the aim is to describe the *process* that led to the definition of reasonable alternatives for appraisal. This amounts to a relatively early step in the plan-making process which, in turn, has a bearing on the extent of evidence gathering and analysis that is proportionate, also recalling the legal requirement, which is to present an *"**outline** of the reasons for selecting alternatives…"* [emphasis added].

5.2 Strategic factors

Introduction

5.2.1 The aim of this section of the report is explore the strategic issues and options with a bearing on the definition of reasonable growth scenarios. Specifically, this section of the report explores:

- Quantum – how much new development is needed (regardless of capacity to provide for it)?
- Distribution – where within the borough is more / less suited and what types of growth are supported?

Quantum

5.2.2 This section sets out the established Local Housing Need (LHN) figure for the borough, before exploring arguments for the local plan providing for a quantum of growth either above or below LHN.

Background

5.2.3 A central tenet of the plan-making process is the need to **A)** establish housing needs; and then **B)** develop a policy response to those needs. The Planning Practice Guidance (PPG) explains:

"Assessing housing need is the first step in the process of deciding how many homes need to be planned for. It should be undertaken separately from… establishing a housing requirement… and preparing policies to address this such as site allocations."

5.2.4 With regards to (A), the NPPF (paragraph 60) is clear that establishment of **LHN** should be informed by an *"assessment conducted using the **standard method**… unless exceptional circumstances justify an alternative approach which also reflects… demographic trends and market signals"* [emphasis added].

5.2.5 With regards to (B), many local authorities will respond to assessed LHN by providing for LHN in full or, in other words, setting a **housing requirement** that equates to LHN, and a **housing supply** through policies sufficient to deliver this housing requirement (at a suitable rate / trajectory over time, which will invariably necessitate putting in place a 'buffer' to mitigate against the risk of unforeseen delivery issues). However, under certain circumstances it can be appropriate to set a housing requirement that departs from LHN.

Stafford Borough's LHN

5.2.6 A three-step standard method for calculating LHN was first published by the Government in 2017, and then a fourth step was added in 2020.[7] This fourth step, known as the 'cities and urban centres uplift', does not have a bearing on the calculation of Stafford Borough's LHN.

5.2.7 There have also been some notable changes to guidance in respect of the data that should be utilised as an input to the standard method, since the method was first introduced. Specifically, following a consultation in late 2018, the PPG was updated to require that the household growth projections used as an input to the method must be the 2014-based projections, rather than more recent projections. The PPG explains that the change was made in order to:[8] *"provide stability… ensure that historic under-delivery and declining affordability are reflected, and to be consistent with the Government's objective of significantly boosting the supply of homes."* Updates to the PPG in late 2020 confirmed this approach.

5.2.8 The standard method derived LHN for the borough is currently **391 dwellings per annum**, or 7,820 homes in total over the twenty-year plan period.[9] The Secretary of State for Levelling Up, Housing and Communities has indicated that the standard methodology will be reviewed in 2022.

Providing for above LHN?

5.2.9 In addition to paragraph 60 of the NPPF, local plan-makers must consider paragraph 010 of the PPG on Housing and Economic Needs Assessment, which sets out reasons for exploring 'above LHN' options:

"The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area… there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.

… Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of: growth strategies for the area that are likely to be deliverable… (e.g. Housing Deals); strategic infrastructure improvements that are likely to drive an increase in [need]; or an authority agreeing to take on unmet need from neighbouring authorities… There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need… are significantly greater than the outcome from the standard method."

5.2.10 In the Stafford Borough context there is no "housing deal" or formal "growth strategy" in place, but there is a committed strategic infrastructure upgrade, in the form of Stafford **HS2** station. It is also the case that "*previous levels of housing delivery… or previous assessments of need… are significantly greater than the outcome from the standard method."* Specifically, the current Plan for Stafford Borough sought to meet needs by setting the housing requirement at **500 dpa,** and, over the past ten years (2011-2021) **600 dpa** have been delivered on average. Hence there are arguments for providing for 'above LHN'.

5.2.11 More generally, there are well understood economic growth opportunities, such that there are "market signals" (NPPF paragraph 60) that indicate a need to consider setting a housing requirement above LHN.

[7] See gov.uk/guidance/housing-and-economic-development-needs-assessments.
[8] See paragraph 4 and 5 at: gov.uk/guidance/housing-and-economic-development-needs-assessments
[9] This is a 'uncapped' figure, meaning that step 3 of the standard method ("Capping the level of any increase") does not apply.

5.2.12 Market signals were explored through an Economic and Housing Development Needs Assessment (**EHDNA**, 2020), which concluded: *"Reasons why the Council may consider identifying a higher housing requirement figure* [i.e. above LHN] *in its emerging Local Plan include the need to accommodate a sufficient economically-active workforce to meet needs arising from projected economic growth…"*

5.2.13 Importantly, the EHDNA explored a series of growth scenarios (see Section 10 of the report), ranging from provision for LHN (Scenario A) to provision for a figure nearly twice LHN, with each scenario also reflecting varying employment growth assumptions. These scenarios were subsequently also a focus of appraisal and consultation at the Issues and Options stage (2020).

5.2.14 Current views on the scenarios explored in 2020 are as follows:

- Scenario A - involved providing for **LHN**, and hence warrants further consideration.
- Scenarios B and C - were **lower growth** scenarios that need not be considered further.
- Scenario D – involved providing for **above LHN**, and is discussed below.
- Scenarios E-G - are **higher growth** scenarios, and are discussed below.

5.2.15 Focusing on Scenario D, this sees the housing requirement set at **435 dpa**, and there is an argument to suggest that this represents an objective assessment of housing need, in place of the 391 dpa LHN figure. This is because this approach includes housing to reflect *both* demographic trends and market signals in the form of baseline projected employment growth.

5.2.16 Focusing on Scenarios E-G (the higher growth scenarios), these assume levels of jobs growth that are potentially somewhat aspirational. As such, Scenarios E-G serve as "policy on" scenarios to be explored, but certainly do not represent objective assessments of housing need.

5.2.17 Another potential reason for exploring higher growth, as part of the process of preparing a local plan, is **affordable housing needs**, with the PPG stating:[10] *"An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes."* The EHDNA explored affordable housing needs locally, concluding: *"Affordable housing need is in the range between 252 and 389 affordable homes per annum between 2020 to 2040 which represents a significant proportion [at least 65%] of the LHN based on the standard method…"* As such, affordable housing needs do serve as a reason for exploring providing for above 391 dpa, and possibly also above 435 dpa, through the local plan, recognising that affordable housing is (primarily) delivered as a proportion of market housing-led schemes. However, it is not necessarily reasonable to explore higher growth options that could theoretically lead to affordable housing needs being met in full. This is because, under such scenarios, a lack of need / market demand for market housing could become a limiting factor.

5.2.18 Finally, with regards to **unmet needs** from neighbouring areas, the first point to note is that Stafford Borough forms its own 'best fit' housing market area (HMA), as explained in the EHDNA, which serves as an argument against providing for unmet housing needs from neighbouring areas. However, despite being a self-contained HMA, it is nonetheless the case that there are strong links to neighbouring areas, in particular the conurbations to the north and south, to which the borough is well linked by road and rail.

5.2.19 Beginning with the North Staffordshire conurbation, the Stoke on Trent Local Plan Issues and Options consultation document (2021) explains that the Strategic Housing Market Assessment (SHLAA) identifies sites with a total combined capacity sufficient to provide for LHN. However, this is only marginally the case (specifically, LHN is 13,680 whilst SHLAA capacity is 13,991), and there are delivery challenges, specifically associated with challenging brownfield sites and low land values / viability. The latest situation is that the plan-making timetable is delayed, hence current understanding is a degree of unmet need risk.

5.2.20 With regards to Newcastle-under-Lyme, the local plan Issues and Options consultation document (2021/22) discussed setting the housing requirement either at LHN or a higher figure to reflect employment growth projections / aspirations, hence there is no unmet need risk. The borough comprises Green Belt and land beyond the Green Belt, as well as land forming part of the North Staffordshire conurbation, hence would be arguably well placed to provide for any unmet needs arising from the City of Stoke-on-Trent. The next step is consultation on a full draft plan under Regulation 18, timetabled for Autumn 2022.

[10] See paragraph 024 at: gov.uk/guidance/housing-and-economic-development-needs-assessments

5.2.21 In this light, attention may focus on Birmingham City and the Black Country (Dudley MBC, Sandwell MBC, Walsall Council and Wolverhampton City Council), where there is an acute issue of unmet housing need, as recently explained in a report prepared on *"Distributing the unmet housing needs of the Black Country"* (see Section 2 of the report). Unmet need from the Black Country alone is understood to be in the region of c.28,000 homes up to 2039, and the report suggests that Stafford Borough might provide for a small proportion of this figure (6%). The report is a 'top down' exercise that takes little or no account of detailed local considerations, e.g. land availability / suitability in those parts of Stafford Borough that are better connected to the Black Country (in particular, areas that are, or could be, connected by rail). However, it is nonetheless the case that the report provides evidence in support of exploring higher growth scenarios.

5.2.22 Furthermore, there is a need to note that through the Issues and Options consultation (2020), the Black Country authorities formally requested – under a scenario whereby the Stafford Borough Local Plan allocates a large new settlement – that Stafford Borough Council should take between 1,500 and 2,000 homes as a contribution to meeting unmet housing need, as well as 35-40 ha of employment land.

Providing for below LHN?

5.2.23 Paragraph 11 of the NPPF states: *"… strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas,* ***unless****: i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."* [emphasis added]

5.2.24 There are parts of Stafford Borough that are constrained by the "assets of particular importance" listed by the NPPF. However, there are also extensive parts of the borough that are not constrained by these assets. Furthermore, not providing for LHN within Stafford Borough would lead to 'unmet need' having to be provided for elsewhere within a constrained sub-region. In particular, those authorities to which Stafford and Stone are best connected, namely those authorities to the north and to the south, are constrained by Green Belt and, in the case of authorities to the south, international and national environmental designations. These areas are having challenges dealing with their own locally arising need and, in the case of adjoining local authorities to the south, unmet needs arising from Birmingham and the Black County,[11] such that there is no potential to provide for unmet needs arising from Stafford Borough.

Conclusion on housing quanta options to examine further

5.2.25 In light of the discussion above, there is considered to be a need to focus attention on growth scenarios that would involve setting the housing requirement at **435 dpa** or a higher figure. A higher figure would likely be in response to unmet needs, as opposed to locally arising needs, and an obvious unmet needs figure for discussion is 2,000 homes, or 100 dpa over the 20 year plan period, such that the local plan housing requirement would be set at **535 dpa**.

5.2.26 With regards to scenarios that would involve setting the housing requirement at 391 dpa, there are arguments to suggest that such scenarios are 'unreasonable', including because of the risk of an imbalance between housing and jobs growth locally. However, it is difficult to reach a conclusive decision at this stage in the process (of arriving at reasonable growth scenarios). The question of precise quanta figures to reflect across the reasonable growth scenarios is returned to within Section 5.5, subsequent to consideration of broad distribution, site options and sub-area scenarios.[12]

[11] The preferred options version of the South Staffordshire Local Plan (2021) proposed to set the housing requirement, for the plan period, at LHN plus 4,000 homes to reflect unmet need.

[12] It is important to reiterate that there is invariably a need to provide for a supply buffer over-and-above the housing requirement to ensure that the requirement is met in practice over the plan period (recognising that unforeseen issues with planned supply are inevitable), and ensure a robust supply trajectory, i.e. a situation whereby a five year housing land supply (5YHLS), as measured against the housing requirement, can be maintained throughout the entire plan period. The ideal situation involves a steady housing trajectory. However, under the Government's PPG, there is flexibility to set a 'stepped' housing requirement / trajectory, where there is evidence to demonstrate that this is necessary in light of wider sustainable development objectives. A stepped requirement / trajectory is one whereby the requirement is set at a level below the annualised total plan period housing requirement in the early years of the plan, and then this is compensated for in the latter years of the plan.

Broad distribution

Introduction

5.2.27 This is the second of two sections examining 'strategic factors' of relevance to the matter of defining reasonable growth scenarios for the local plan.

5.2.28 An important starting point, in respect of decision-making on the broad distribution options that should feed into reasonable growth scenarios for the local plan, is the settlement hierarchy, which was the focus of a standalone consultation in 2018. Further key evidence in respect of broad distribution issues and options was then generated through work at the Issues and Options stage (2020), with the consultation document identifying six broad distribution scenarios, and then the Initial SA Report focusing attention on three of these judged to be better performing.

5.2.29 As such, this section is structured broadly in chronological order, and discusses in turn:

- The settlement hierarchy consultation (2018)
- Identifying distribution scenarios in February at the Issues and Options stage
- 2020 appraisal findings through the Initial SA Report (published February 2020)
- 2020 consultation responses
- Latest evidence

The settlement hierarchy

5.2.30 There is a clear need to take the settlement hierarchy as a primary starting point, when seeking to define reasonable growth scenarios. However, there is also a need to remain open to the possibility of strategic growth at a settlement over-and-above that which the settlement's position in the hierarchy indicates as appropriate, where it is the case that strategic growth would support achievement of strategic objectives. Also, there is a need to consider the possibility of planning for a new settlement.

5.2.31 The position of a settlement in the hierarchy has implications for both the total scale of growth that is appropriate over the plan period (also mindful of growth over longer periods of time, i.e. looking back over years prior to the start of the plan period) and the nature of individual schemes that are typically appropriate. For example, residents of smaller villages often favour smaller schemes dispersed around the village edge rather than a single larger scheme, although there are also arguments for larger schemes.

5.2.32 As discussed, the settlement hierarchy was the focus of a standalone consultation in 2018. Subsequently, in 2022, the Settlement Assessment and Profiles document analysed the size and level of facilities at each settlement. The aim is to place all existing settlements within a hierarchy on an objective basis (i.e. it is not a 'policy choice' for the Local Plan). However, it is recognised that the approach and methodology employed can be open to discussion and refinement. The current hierarchy is as follows:

- Stafford
- Stone
- 12 larger settlements[13]
- 27 smaller settlements[14]

5.2.33 Within the third tier, it is also important to note that Eccleshall benefits from a 'local centre' in the borough's retail hierarchy, as opposed to a 'town centre (Stafford and Stone)' or 'neighbourhood centre'.

5.2.34 Finally, it is noted that the existing Plan for Stafford Borough (2014) directed growth broadly as follows: 1) Stafford - 7,000 homes; Stone - 1,000 homes; third tier - 1,200 homes; four tier – 800 homes. Also, within the third tier, Yarnfield and Great Haywood stand-out as having seen high growth over the period 2011-21 (at least as a proportion of dwelling stock), followed by Hixon and Eccleshall.

[13] Barlaston, Blythe Bridge, Eccleshall, Gnosall, Great Haywood, Haughton, Hixon, Little Haywood and Colwich, Meir Heath / Rough Close, Weston, Woodseaves and Yarnfield.
[14] Adbaston, Aston-By-Stone, Bradley, Brocton, Brocton A34, Church Eaton, Clayton, Cold Meece, Cotes Heath, Creswell, Croxton, Derrington, Fulford, Great Bridgeford, Hilderstone, Hopton, Hyde Lea, Milford, Milwich, Moreton, Norbury, Norton Bridge, Ranton, Salt, Seighford, Swynnerton, and Tittensor.

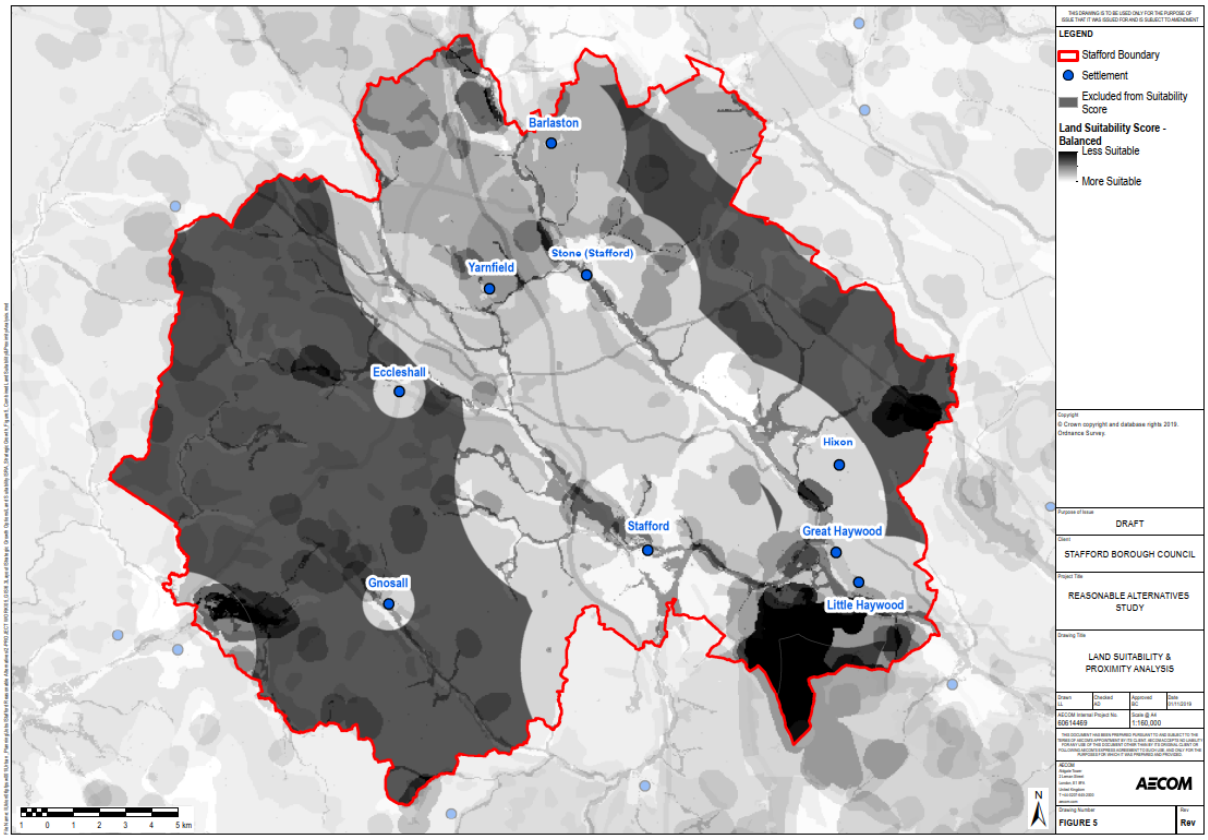
Identifying distribution scenarios in 2020

5.2.35 As discussed, the Issues and Options consultation document identified six broad distribution scenarios, and then the Initial SA Report focused attention on three of these judged to be better performing.

5.2.36 The consultation document arrived at the six growth scenarios following consideration of:

- Broad growth typologies – specifically the degree to which there should be support for: intensification of town centres and other centres / urban areas, versus small sites at the edge of existing settlements, versus strategic urban extensions versus one or more new garden communities. The consultation document explained that in practice there is invariably a need for a mixed portfolio of site typologies.
- Conceptual approaches to distributing growth – in particular, the consultation document explored the merits of clustering growth at linked settlements, e.g. along a transport corridor or around a shared higher order settlement (which, in practice, means lower order settlements located close to Stafford).
- Garden community options – by the time of the Issues and Options consultation it had already been recognised that there was merit in giving detailed consideration to garden community options, and a study by AECOM had identified a shortlist of seven such options. Figure 5.2 is taken from the study, and shows the outcomes of GIS analysis to indicate variation in 'garden community suitability'.

Figure 5.2: Garden community suitability (AECOM, 2020)



5.2.37 The six broad distribution scenarios presented in the consultation document varied in terms of the three broad matters discussed above (paragraph 5.2.34) and were not entirely mutually exclusive. The consultation document then identified the following two key variables:

- Conceptual approach to distribution: A) dispersed; or B) focused along transport corridors?
- One or more garden communities: A) yes; or B) no?

5.2.38 In light of these two variables, each associated with two options, four mutually exclusive alternatives were defined. However, it was determined that one of these could be ruled out, specifically a scenario involving focused growth along transport corridors without a new garden community, because supply options along transport corridors are limited / constrained.

5.2.39 This led to the identification of three reasonable alternative broad distribution scenarios in 2020:

A) Disperse growth

B) Option (A) plus a garden community

C) Focus growth along transport corridors plus a garden community.

5.2.40 These three distribution alternatives were subjected to appraisal within the Initial SA Report. With regards to growth quantum, the appraisal explored both **'high'** and **'low'** growth for each of the distribution scenarios, such that a total of six high-level growth scenarios were appraised – see Table 5.1.

2020 appraisal findings

5.2.41 As discussed, the 2020 Initial SA Report presented an appraisal of six high level growth scenarios. Table 5.1 presents the appraisal summary (as presented within the non-technical summary of the report). With regards to methodology: Within each row (i.e. for each of the topics that comprise the SA framework – see Section 3) the columns to the right hand side seek to both rank the scenarios in order of performance (where a rank of one indicates best performing) and categorise the performance of each scenario in terms of 'significant effects' using red / amber / light green / green.[15]

Table 5.1: Summary early growth scenarios appraisal from the 2020 Interim SA Report

Topic	Disperse growth		Disperse growth Garden community		Transport corridors Garden community	
	High	Low	High	Low	High	Low
	Rank of preference and categorisation of effects					
Air quality	2	1	4	3	6	5
Biodiversity	2	1	2	1	2	1
Climate change adaptation	6	5	4	3	2	1
Climate change mitigation	3	3	1	2	1	2
Economy and employment	2	2	1	2	?	?
Health and wellbeing	1	1	1	1	2	2
Historic environment	2	1	2	1	2	1
Housing	1	2	3	4	5	6
Land and soils	2	1	4	3	6	5
Landscape	2	1	4	3	6	5
Population and communities	1	2	1	2	3	3
Transport	2	1	4	3	6	5
Water	4	3	2	1	2	1

[15] **Red** indicates a significant negative effect; **amber** a negative effect of limited or uncertain significance; **light green** a positive effect of limited or uncertain significance; and **green** a significant positive effect. No colour indicates a neutral effect.

5.2.42 As can be seen from the table above, the appraisal showed a very mixed picture, with all of the high-level growth scenarios associated with pros and cons. The 'disperse low growth' scenario performed best in terms of more topics than any of the other scenarios, but that is not to say that the appraisal found this scenario to be best performing overall, or 'most sustainable', because the appraisal was undertaken with no assumptions regarding the degree of importance / weight in the decision-making process that should be assigned to each topic, nor is it fair to assume that the topics each carry equal weight.

5.2.43 There was notable support for dispersing growth from a number of perspectives. However, it is important to recall that the appraisal was high-level, with no assumptions regarding specific site allocations.

2020 consultation responses

5.2.44 The consultation generated a total of 181 responses, which can be viewed at: www.staffordbc.gov.uk/new-stafford-borough-local-plan-2020-2040-issues-and-options-responses. Of this total 43 responses were received from strategic stakeholder organisations, and the bullet points below present a brief summary of key responses from these organisations in respect of the spatial strategy / growth scenarios (N.B. the list is not comprehensive, and other consultation responses are integrated into appraisal sections, below).

- The Association of Black Country Authorities (ABCA) – explained that: "Our evidence suggests that Stafford and the Black Country have a functional relationship and… we would welcome the opportunity to work with Stafford Borough… to produce further technical evidence to support our initial analysis." The response went on to request that, under a scenario whereby the Stafford Borough Local Plan allocates a large new settlement, the borough should take between 1,500 and 2,000 homes as a contribution to unmet housing need, as well 35-40 ha of employment land. The response also stated:

  "ABCA supports the potential for Meecebrook (Option D) to be allocated as a new Garden Community. The site has the potential to provide up to 11,500 new homes and related employment uses, which will be to the mutual benefit of Stafford and the Black Country. We note that the site assessment work undertaken by AECOM suggests that Meecebrook, along with Hixon (Option E), offers one of the most suitable options for the location of a new sustainable settlement, subject to investment in the provision of a new railway station and related public transport improvements. Whilst Hixon has the potential to deliver a new settlement, albeit at a much smaller scale than Meecebrook, it is our view that a larger settlement such as that which could be accommodated at Meecebrook will in the longer term be the most sustainable option... A new settlement of this scale will generate sufficient housing provision and employment uses to justify significant infrastructure and transport improvements. Alongside this, it is our view that the site is the most sustainable in terms of its accessibility to the Black Country via both the mainline rail network (with the potential for a new railway station) and the M6 highway network."

- Staffordshire County Council – submitted a detailed response covering a wide range of issues, with a particular focus on provision for educational needs (discussed further below). The following is an example of a view submitted in respect of the growth scenarios: "… we believe that the 'Dispersal of Development' option should be avoided as development spread out over such a geography will make the planning and delivery of required infrastructure more complicated and potentially unviable."

- Severn Trent Water – submitted a detailed response covering a wide range of water-related issues. Detailed messages are presented below, within appraisal sections, but examples include:

  "… generally speaking; string settlement clusters and wheel settlement clusters are unfavourable. This is because although they appear to be individual and separate settlements more often their infrastructure is a single system... "New garden communities… can pose major strategic challenges. That being said they also provide great opportunities to arrange infrastructure in an idealised way..."

- Staffordshire Wildlife Trust – declined to comment on the growth scenarios, stating: "It is not possible to make informed judgements… because the sustainability appraisal is incomplete, and all available and required evidence base information, such as the Nature Recovery Network mapping, has not been used..." However, comments were made on the strategic development site options (discussed below).

- Highways England (National Highways) – stated: "While we have reviewed the options proposed, none are detailed enough at this stage... We therefore seek to reserve the opportunity to comment… Until that point, we ask that SBC considers the Strategic Road Network when making… decisions."

- No response was received from either of the North Staffordshire conurbation authorities. With regards to statutory environmental consultees, the Environment Agency did not respond, whilst the responses received from both Historic England and Natural England did not comment on the merits of the growth scenarios that were a focus of the consultation, instead focusing on matters of thematic policy.

Latest evidence

5.2.45 Since the issues and options consultation there have been some considerable shifts to the national context to local plan-making, perhaps most notably following the experience of the **Covid-19 pandemic** and national lockdowns. Considerations for the development of reasonable growth scenarios include:

- Employment land – there is uncertainty regarding the long term trend in respect of working from home, versus hybrid working models etc, also with implications for traffic modelling / transport planning;
- Indoor and outdoor space – green infrastructure is more valued than ever as a recreational / well-being resource, and the importance of addressing spatial imbalances in accessibility – both to green infrastructure and quality housing – has come to the fore; and
- Town and local centres – the rise of online retail shows little sign of abating (also with implications for planning for warehousing, distribution, logistics space and transport planning) whilst the wider socio-economic and community functions of town and local centres are increasingly valued. Wider context comes in the form of national changes to planning use classes and permitted development rights that create flexibility to convert away from retail and other traditional town centre uses.

5.2.46 Another key consideration, by way of national context, is the increasing focus on local plan-making as a central component of the national strategy for addressing the **climate and ecological emergency**, including achieving a decarbonisation trajectory in-line with established targets dates.

5.2.47 Beginning with the Environment Act (2021), perhaps its centrally important component is a national requirement for 10% biodiversity net gain. This will be measured at the planning application stage, applying the latest Defra 'metric', but there is increasingly recognition that strategic planning through local plans has a key role to play, including by facilitating the right type of offsite compensatory measures in the right locations. There is a need to target efforts at priority landscape scales (e.g. river valleys, historically wooded areas), in-line with established strategic objectives; however, there are also arguments for delivering compensatory measures in proximity to development locations.

5.2.48 The Environment Act also requires preparation of Local Nature Recovery Strategies (LNRSs) nationwide to guide efforts, and so it will be important for local plans to feed-into and integrate with LNRSs as far as possible, ensuring that they are prepared with an understanding of growth locations and means of effectively leveraging development industry funding. The Royal Town Planning Institute (RTPI) recently commented that there *"needs to be a much clearer requirement and encouragement for LNRS to take the contents of local plans into account when they are being devised and vice versa"*. Ahead of a LNRS there is a need to draw-upon understanding of strategic biodiversity and wider green / blue infrastructure priority areas, with current understanding set out in the Stafford Borough Nature Recovery Network Mapping report (2019). In April 2022 the Council resolved that this should be used to guide nature recovery locally. Also, a case-study of targeting efforts at priority landscape scales in and around Stafford is set out here.

5.2.49 The need to avoid a situation whereby planning for biodiversity net gain leads to a net reduced emphasis on strategic landscape scale interventions, due to an increased focus on small-scale / piecemeal interventions within development sites, was a point recently highlighted by a research study completed by ze Ermgassen et al. (2021). Whilst the Government had previously anticipated 25% of biodiversity units being achieved offsite, the research found the figure in practice to be much lower, and the study authors are concerned about an over reliance on onsite measures as this could lead to opportunities missed in respect of *"strategic investments in the local nature recovery networks"* and *"investments in regional biodiversity priorities that can help restore biodiversity at a landscape scale"*. The authors recognise that there are strong 'access to greenspace' arguments in favour of generating biodiversity units onsite, and that an onsite focus has *"broad support from across stakeholders"*, but suggest *"this priority risks overwhelming the biodiversity goals of the policy… potential trade-offs should be explicitly discussed."*

5.2.50 With regards to **decarbonisation**, recent national context comes from the Ten Point Plan for a Green Industrial Revolution, the Energy White Paper, the Transport Decarbonisation Plan, the UK Net Zero Strategy and the Heat and Buildings Strategy.

5.2.51 Focusing on emissions from the built environment, the Ten Point Plan (2020) made clear the extent to which this is a national priority – see Table 5.2 – and there is clarity on: the central importance of considering both operational (or 'in use') and non-operational (e.g. embodied) emissions; a focus on an 'energy hierarchy' approach to operational emissions; and also the need to focus on heating. For example, the UK Green Building Council (UKGBC) Policy Playbook (2021) explains:

"According to the Climate Change Committee, in order to reach net zero the UK must reduce its emissions from 430 MtCO2e to around 29 MtCO2e in 2050. This will require a reduction in the direct emissions from buildings ***from ~85*** *MtCO2e in 2017* ***to ~4*** *MtCO2e in 2050. To achieve this… will require… using a mixture of energy efficiency and low carbon heating measures."* [emphasis added]

Table 5.2: Government's Ten Point Plan (2020) – ranked by stated emissions savings

Ten point plan		GHG savings 2023-2032 (MtCO2e)
7	**Greener Buildings**	**71**
2	Low Carbon Hydrogen	41
8	Carbon Capture, Usage and Storage	40
1	Offshore Wind	21
4	Zero Emission Vehicles	5
5	Public Transport, Cycling and Walking	2
6	Jet Zero and Green Ships	1
9	Natural Environment	-
3	Nuclear Power	-
10	Green Finance and Innovation	-

5.2.52 Also, with regards to operational built environment emissions, the Net Zero Strategy commits to significantly tightening Building Regulations: *"We will introduce regulations from 2025 through the Future Homes Standard to ensure all new homes in England are ready for net zero by having a high standard of energy efficiency and low carbon heating installed as standard… As an interim measure… we plan to introduce an uplift in standards, effective from June 2022, for England that would result in a 31% reduction in [regulated operational] carbon emissions from new homes compared to current standards."*

5.2.53 The key task for local plans, therefore, is to capitalise on this momentum, including by directing new homes to sites with inherent locational built environment decarbonisation opportunities. The focus is often primarily on transport emissions, but built environment emissions are also highly relevant to local plans.

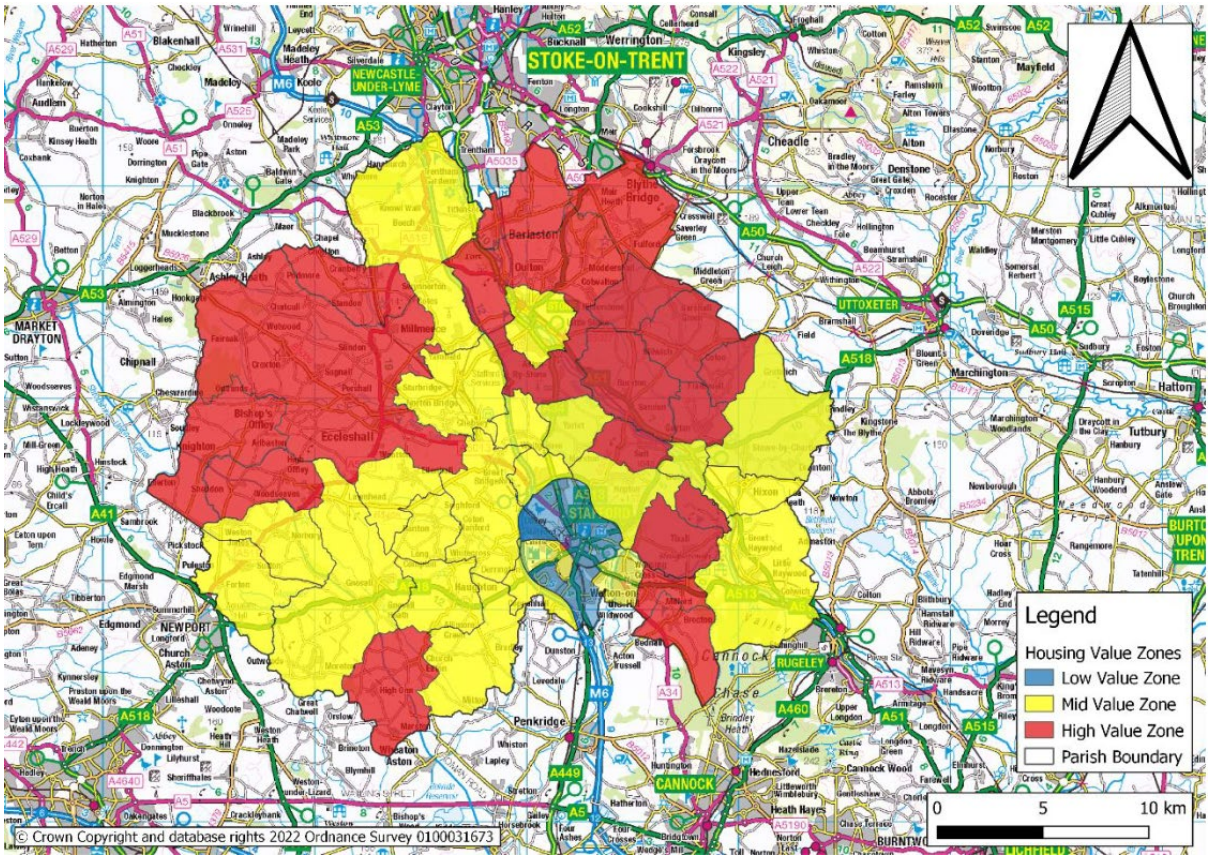
5.2.54 For example, a spatial strategy option might be seen to perform well where it directs growth to:

- schemes with economies of scale and/or located in areas with strong development viability (see Figure 5.3) and/or with land-owners willing to accept land value capture for public benefit (supportive of viable delivery of climate mitigation along with affordable housing, for example);
- sites controlled by developers with a proactive approach to decarbonisation, for example committed to: delivering 'buildings of the future', as envisaged by the UK Heat and Buildings Strategy (2021); an ambitious approach to unregulated emissions, including embodied and other non-operational emissions, including via modern methods of construction (e.g. modular homes); 'smart electricity systems', seen as a priority within the Energy Strategy (2020); and exploring use of hydrogen, including for heating (noting that the Hydrogen Strategy (2021) proposes a new 'hydrogen town' by the end of the decade.
- sites and broad areas (e.g. town centres) associated with inherent opportunities around capturing waste heat (e.g. a sewage works) or ambient heat (e.g. a watercourse), or where the masterplanning / design concept is supportive of heat networks, e.g. with high densities and a fine grained use mix; and
- sites with inherent opportunities around renewable power (solar, wind, hydro; albeit recognising that major schemes typically feed into the national grid).

5.2.55 As part of this, there is also the possibility of setting local policy to require new buildings to achieve emissions standards that exceed the requirements of Building Regulations and / or specifying how required standards should be achieved, e.g. the extent to which there should be a 'fabric first' approach, and the extent to which there should be flexibility to allow for offset payments to be made by the developer to address residual onsite emissions.

5.2.56 However, there are significant cost implications, such that this is an important development viability consideration, as explained within a recent study for Basingstoke and Deane Borough Council, and also within the Stafford Local Plan and CIL Viability Study (2022). Viability is a key consideration in the Stafford Borough context, in that it varies significantly across the borough (Figure 5.3).

Figure 5.3: Development viability zones within the borough – with implications for policy 'asks' of developers



5.2.57 A related matter is the question of whether decarbonisation scenarios can and should be formally defined and appraised, and the question of whether it is appropriate to set a decarbonisation 'target' for the Local Plan. A challenge, in this respect, relates to the fact that new homes represent only a small proportion of total potential emissions savings, as can be seen from Figure 17 of the recent UK Heat and Buildings strategy. However, methods for scrutinising growth scenarios in terms of decarbonisation objectives are emerging, and the work recently undertaken in support of the Greater Cambridge Plan should be reviewed as an example of good practice. The study notably explores 48 scenarios, where the variables are: 1) growth quantum; 2) spatial strategy; and 3) 'zero carbon policy'. A key point to note is that the performance of scenarios is highly dependent on emissions from transport.

5.2.58 Final points to note, by way of context to defining reasonable growth scenarios, are:

- Recent national context comes from the RTPI / TCPA *Guide for Local Authorities on Planning for Climate Change* (see www.tcpa.org.uk/planning-for-climate-change) and also a research undertaken by Lichfields (see lichfields.uk/time-to-panic-planning-and-the-climate-emergency) – see Box 5.1.
- Staffordshire County Council has committed to reaching net zero across its own estate and operations by 2050, and regularly publishes an action plan. The latest action plan is available here.
- Stafford Borough has published a Climate Change and Green Recovery Strategy for the period 2020 – 2040, which sets out a commitment to achieve net zero borough-wide by 2040. Key objectives are: Reduce emissions from our own activities; Work in partnership… to take action that contributes to carbon neutrality…; Mitigate and adapt to climate change; and Continue to implement our green recovery objectives. The strategy includes a considerable focus on the new local plan, for example stating:

  "… one of the key drivers being to achieve our ambitions towards carbon neutrality. The plan will promote sustainable construction and house building, protect and enhance the natural environment, mitigate the risk of flooding, promote carbon reduction in travel and encourage renewable energy production.

  … We also need to ensure that the refresh of our local plan incorporates a focus upon nature-based solutions to look at how we can manage flood risks, create attractive carbon neutral communities such as Stafford Station Gateway and the proposals for Meecebrook, increase biodiversity and improve and promote healthier living and lifestyles"

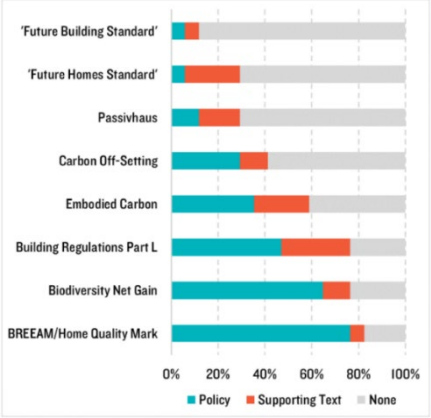
Box 5.1: Recent context and evidence in respect of built environment decarbonisation

Beginning with the RTPI / TCPA guide (2021), this presents a series of six basic steps in the section on plan-making. The following is a summary (focusing on mitigation / decarbonisation in particular):

1. Unlock the potential of the local development plan. Ensure that the community is at the heart of the process and that the plan is seen as a key corporate priority in responding to the climate crisis.
2. Understand the legal and policy obligations for action on climate change, including the Sixth Carbon Budget and how these national targets apply to actions that can be controlled or influenced locally.
3. Ensure that there is comprehensive relevant evidence on climate mitigation, and use that evidence to set local carbon reduction targets for the local development plan. Make full use of existing online tools and knowledge partnerships, and seize the digital opportunity to make this evidence accessible to the public.
4. Apply that evidence to assess and then select the policies that are consistent with targets.
5. Use established assessment frameworks to monitor the effectiveness of policy wherever possible, and engage knowledge partners such as higher education institutions to support the analysis of policy impacts.
6. Ensure that whenever a decision is made contrary to plan policy the climate impacts of that decision are fully assessed. Development should not be approved if contrary to targets and objectives.

Beginning with Step 3, it is not clear what form a target for the local plan would take' (such that it allows for evaluation and monitoring). Regardless, there is a need to select policies that reflect a level of ambition that reflects the climate emergency (Step 4). Additionally, there is a need to ensure that key decisions taken in respect of spatial strategy and site selection account for decarbonisation as a priority. The study includes a short section on site selection, explaining: *"Reducing the need to travel, connecting to existing heat networks and avoiding areas of flood risk are obvious considerations."*

With regards to 'selecting policies', Lichfields' research article presents useful analysis of the percentage of recent local plans identifying named 'standards' to address climate change in policies or in the supporting text. The analysis finds that there is widespread policy requiring BREEAM standards and also a percentage improvement on Building Regulations is quite widespread, but that only around 10% of plans reference Passivhaus standard in policy. See further discussion in Appendix III.



Whilst there is a need for caution around creating a complex and confusing policy environment, there is clear merit to exploring the justification for going beyond the requirements of building regulations in respect of regulated operational emissions, and also potentially local policy on non-operational emissions and/or unregulated operational emissions. Lichfields conclude: *"… whilst it is not time to panic… planning needs to stand up and be counted in the climate change arena."*

Conclusion on broad distribution issues/options

5.2.59 On the basis of the discussion above, the following key messages emerge:

- There are strong arguments for supporting one or more **large strategic schemes**, including in light of appraisal work and consultation responses received to-date. Strategic sites are those with a housing capacity in the several hundreds or thousands, and associated with economies of scale that enable delivery of new or upgraded strategic infrastructure alongside housing and a strategic approach to masterplanning and design, for example ensuring a good mix of uses onsite (also a good mix of homes in terms of type, size and tenure). Growth scenarios with a focus on one or more strategic sites can tend to be associated with a range of benefits, for example from a perspective of infrastructure capacity (e.g. road, community, green infrastructure), place-making and decarbonisation. However, strategic sites also give rise to a range of issues, including delivery risk, e.g. because of required infrastructure.

  N.B. the term 'strategic development' is used moving forward, rather than 'garden community'.

- There is also a need to support a **mix of site types**, and a degree of dispersal (mindful of the settlement hierarchy), in order to ensure a robust housing supply trajectory (thereby maintaining a 5 year Housing Land Supply) and that local housing needs are met. As well as focusing on individual settlements as a key geography, there is a need to consider settlement clusters (e.g. settlements linked to Stafford, and clusters of villages that share services / facilities) and transport corridors (e.g. with a view to avoiding traffic congestion and supporting upgrades, including to public transport services), although work to explore high-level growth scenarios in 2020 did not highlight transport corridors as a priority geography.

- There is a clear need to make best use of **previously developed land**, also aligning with wider objectives including around reimagining town centres and ensuring high quality place-making / 'beauty'. However, previously developed sites are often associated with delivery challenges, and there is a need to ensure new homes with good space standards and access to green / open space.
- There is also a clear need to protect the **Green Belt** as far as possible, in line with the NPPF, with attention focusing on the Green Belt in the north of the borough, given that in the south is constrained by Cannock Chase. The strategic context serves to suggest that demonstrating the exceptional circumstances necessary to justify release of the Green Belt for development through the local plan would be highly challenging, due to the extent of reasonable growth locations outside of the Green Belt.
- There would, in all likelihood, be insufficient justification for Green Belt release even under high growth scenarios whereby the local plan provides for **unmet needs** arising from one or more neighbouring authorities. This is particularly the case as, under such scenarios, there would likely be a strong argument for weighting growth to locations best connected to the area generating unmet needs by road and rail. For example, Map 1 within the adopted Plan for Stafford Borough serves to clearly highlight that the influence of Birmingham and the Black Country decreases north of Stafford, although locations in the centre of the borough along the main transport corridor do have a degree of connectivity.
- Objectively assessed needs for **employment land** are associated with significant uncertainty at the current time. Supply from committed sites could potentially be sufficient to meet needs, but there are also arguments for new allocations, particularly under higher housing growth scenarios. A number of sites are in contention for allocation, with a stand-out large site option at Stafford (see Sections 5.3 and 5.4). All would involve extending an existing or committed strategic employment area.
- There is also a need to consider sites suited to meeting **wider needs**, including Gypsy and Traveller and Travelling Show People pitches / plots and sites and specialist housing.
- With regards to **community infrastructure**, a key consideration is school capacity, and health infrastructure is another consideration (although not with the same land requirements, nor with the same potential to deliver increased capacity through local plans). On one hand, there is a need to direct growth to locations with existing capacity; however, on the other hand, there can be benefit to directing growth to locations where development would deliver or facilitate strategic upgrades (e.g. new or expanded schools) over-and-above what is needed to meet the needs of the new development.
- There is a need to take a strategic approach to planning for **green infrastructure** and landscapes, integrating with landscape / historic / settlement character and the emerging agenda of planning for biodiversity and wider environmental net gain. As part of this, there is a clear need to direct growth away from sensitive locations, e.g. internationally and nationally designated sites. However, on the other hand, there is a need to consider the potential for growth in proximity to such areas, to help fund or deliver strategic enhancements. Other key 'environmental' considerations include planning for water resources, the water environment and avoiding the loss of best and most versatile agricultural land.
- A priority issue for the local plan is aligning with the borough's climate change strategy and, in turn, supporting achievement of the 2040 **net zero** target. There is a need to minimise per capita emissions both from transport (with well understood implications for spatial strategy) and the built environment (less well understood implications). Amongst other things, this will mean exploring options that direct growth to: those parts of the borough with good 'accessibility' and public transport connectivity; one or more strategic growth locations, where economies of scale and a mix of uses can lead to opportunities; and locations where there is an opportunity for growth to support heat networks.
- Development **viability** varies across the borough, with a bearing on the potential to deliver net zero and other interventions. The Viability Study explores trade-offs, including in respect of affordable housing.
- Finally, there is a need to introduce two well-established strategic development options, namely Stafford Station Gateway and Meecebrook. Both have been a focus of considerable work to date, and are a focus of further discussion below. However, neither can be taken as a 'given' for the purposes of the local plan, with other options remaining open for discussion. With regards to Stafford Station Gateway, there is very strong support for the scheme in many respects, as it would involve regeneration of an underused brownfield site adjacent to an Integrated HS2 station, but flood risk is a constraint. With regards to Meecebrook, a key issue is land availability, with MOD land previously thought to be available now known to be unavailable, and other land associated with less certain availability. In turn, there is a need to consider the possibility of a smaller scheme, relative to that discussed previously, which gives rise to issues / potential drawbacks, e.g. around viability and the ability to deliver a new train station.

5.2.60 This list does not aim to be comprehensive, but provides a framework for defining growth scenarios.

5.3 Site options

5.3.1 This section considers:

- The site selection process led by SBC;
- Detailed work to consider strategic site options led by AECOM; and
- Supplementary GIS analysis of site options.

Site selection process

5.3.2 The primary mechanism for considering site options in isolation is the Strategic Housing and Employment Land Availability Assessment (SHELAA) and subsequent stages of the site selection process by SBC Officers, as set out in the Site Selection Topic Paper available as part of the current consultation.

5.3.3 A total of **290 sites** were assessed in stages:

- Stage 1 - sites with constraints rendering them non developable were rejected (after having considered the potential to adjust site boundaries to address the issue). **217 sites** progressed beyond this stage.
- Stage 2 – reject sites not well linked to a settlement. **156 sites** progressed beyond this stage.
- Stage 3 – further detailed work, including engagement with consultants and key consultees.
- Stage 4 - evidence-based decision to select or reject sites. **57 sites** progressed beyond this stage.[16]

5.3.4 These 57 sites are all given detailed consideration within: the SBC Site Assessment Profiles document; the SBC Site Selection Topic Paper; and Section 5.4, below. It is important to note that the total capacity of these 57 shortlisted sites is far in excess of what is required under any reasonably foreseeable scenario.

5.3.5 Figure 5.4 highlights the 57 site options that progressed beyond Stage 4, all of which are considered further in Section 5.4. Of these 57 sites, 53 are being promoted for housing or a mix of uses. Just four are being promoted for employment, two of which overlap with a mixed use site option (Hixon Airfield).

Strategic site options

5.3.6 Two of the seven Strategic Development Site (SDS) options identified in 2020 progressed beyond Stage 4, and a third (SE of Gnosall) passed through in part. SDS options were ruled out mindful of the comparative appraisal presented in Appendix A of the 2020 Initial SA Report.[17] The shortlisted SDS options are discussed in Section 5.4, which explores settlement-specific growth scenarios.

5.3.7 As a further input, **Appendix IV** presents a comparative appraisal of the three options to pass through Stage 4, plus a fourth option, namely Beacon Hill, east of Stafford (see paragraphs 5.4.9 and 5.4.10 for an explanation). The summary appraisal matrix is presented below, with a view to providing a brief insight. The appraisal serves to indicate that the option of strategic growth southeast of Gnosall potentially performs relatively poorly, although this is not clear cut (see further discussion in Appendix IV).

GIS analysis

5.3.8 Finally, as a means of providing supplementary evidence on site options, **Appendix V** presents the findings of an AECOM-led quantitative GIS-based exercise, involving examining the spatial relationship between all site options and a range of constraint/push features (e.g. biodiversity designations) and opportunity / pull features (e.g. schools) for which data is available in digitally mapped form for the borough as a whole. The limited nature of the analysis is such that it does not enable overall conclusions to be reached on the merits of each site; however, it is nonetheless a useful input to the process.

[16] Work at stages 3 and 4 included: landscape assessment, ecological assessment, historic environment assessment, education assessments, transport assessments, water resources assessments and network rail engagement.

[17] One of the ruled out sites, namely Land north of Redhill, was tentatively highlighted by the appraisal (2020) as potentially having a degree of overall relative merit, as indicated by relatively strong performance against a number of objectives. However, the appraisal found this site to perform poorly in landscape terms, and this was a key factor that led the Council to subsequently rule-out the site. The site is associated with an area of raised land between the Rivers Sow (Stafford) and Trent (Stone) corridors, hence there would be a concern regarding long term development creep / sprawl, particularly towards Stafford, where further expansion to the north is an option. There would be the potential to utilise a high pressure gas line to bound the new development, but a concern would remain. The other ruled out SDS options are Seighford, Weston and Haughton, with the former two no longer considered to be available and the latter subject to significant constraints, particularly historic environment-related.

Figure 5.4: All site options

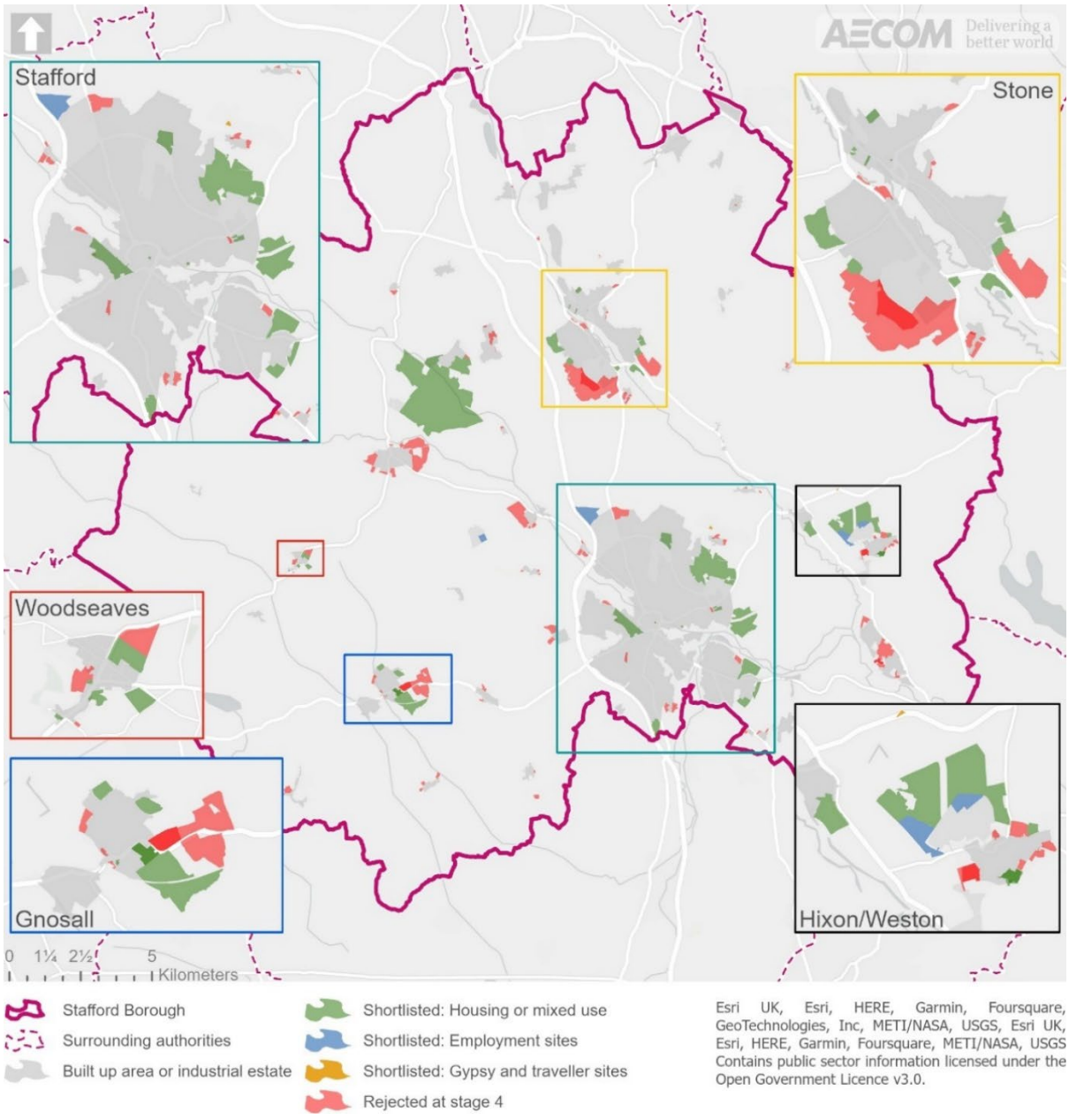


Table 5.3: Summary of the strategic site options appraisal presented in Appendix IV

Topic	Meecebrook	Hixon Airfield	Beacon Hill	SE Gnosall
Air and wider env quality				
Biodiversity				
Climate change adaptation				
Climate change mitigation				
Communities				
Economy and employment				
Historic environment				
Housing				
Land, soil and natural resources				
Landscape				
Transport				
Water				

5.4 Settlement scenarios

Introduction

5.4.1 Discussion has so far focused on A) 'top down' considerations of housing quantum and broad distribution issues and options; and B) 'bottom-up' consideration of site options. The next step is to consider each of the borough's settlements in turn, exploring how sites might be allocated / supported in combination.

5.4.2 This section presents a summary of detailed analysis presented in **Appendix VI.**

What settlements?

5.4.3 The aim here is to consider reasonable scenarios for each of the settlements within the top four tiers of the emerging settlement hierarchy, namely: Tier 1 – Stafford; Tier 2 – Stone; Tier 3 - Meecebrook Garden Community (N.B. special consideration, explained below); and Tier 4 – Larger settlements: Barlaston, Blythe Bridge, Eccleshall, Gnosall, Great Haywood, Haughton, Hixon, Little Haywood and Colwich, Meir Heath / Rough Close, Weston, Woodseaves and Yarnfield.

Methodology

5.4.4 For each settlement informal consideration is given to reasonable alternative approaches that might be taken to allocation ('growth scenarios'), mindful of site specific, settlement specific and borough-wide strategic considerations. The focus is on the 57 sites that passed Stage 4 of the site selection process.

5.4.5 The ultimate aim is to conclude on settlement-specific scenarios that reasonably need to be taken forward to Section 5.5, where settlement scenarios are combined in order to arrive at borough-wide scenarios. The aim is *not* to present a formal appraisal of reasonable alternatives.

5.4.6 Accordingly, the discussions are systematic only up to a point, with extensive application of discretion and planning judgment applied. The aim is not to discuss all site options to precisely the same level of detail, but rather to focus attention on those site options *judged* to be a more marginal, i.e. where the question of whether or not to take the site forward is more finely balance. This approach is taken mindful of the legal requirement, which is to explain reasons for arriving at reasonable alternatives in "outline" terms. Views on the approach taken and the outcomes of the work are welcomed.

N.B. it is important to reiterate that those sites 'progressed' to Section 5.5 are then explored in more detail.

Conclusions on settlement scenarios

5.4.7 The conclusions of the detailed analysis presented in Appendix VI are set out below, firstly in summary form (Table 5.4 and Figure 5.5) and then in detail (Table 5.5). In summary:

- One reasonable growth scenario (nil allocations) – eight higher tier settlements and all tier 5.
- One reasonable growth scenario (a package of allocations) – two settlements.
- Two reasonable scenarios – four settlements (Stafford, Meecebrook, Gnosall, Weston)
- Three reasonable growth scenarios - one settlement (Hixon).

Table 5.4: Summary of the settlement scenarios identified in Appendix VI (new homes from allocations only)

Settlement		Settlement scenarios
Towns	Stafford	**Two scenarios**: 1,181 or 3,181 homes
	Stone	One scenario: 370 homes
Meecebrook GC		**Two scenarios**: 0 or 3,000 homes
Larger villages	Barlaston	One scenario: 0 homes
	Blythe Bridge	One scenario: 0 homes

Settlement		Settlement scenarios
	Eccleshall	One scenario: 0 homes
	Gnosall	**Two scenarios**: 109 or 463 homes
	Great Haywood	One scenario: 0 homes
	Haughton	One scenario: 0 homes
	Hixon	**Three scenarios**: 0, 128 or 1,985 homes
	Little Haywood and Colwich	One scenario: 0 homes
	Meir Heath / Rough Close	One scenario: 0 homes
	Weston	**Two scenarios**: 0 or 175 homes
	Woodseaves	One scenario: 125 homes
	Yarnfield	One scenario: 0 homes
Tier 5 settlements		One scenario: 0 homes
Minimum total homes from allocations		**1,785 homes**
Theoretical max total homes from allocations		**9,299 homes**

Figure 5.5: Summary of the settlement scenarios identified in Appendix VI

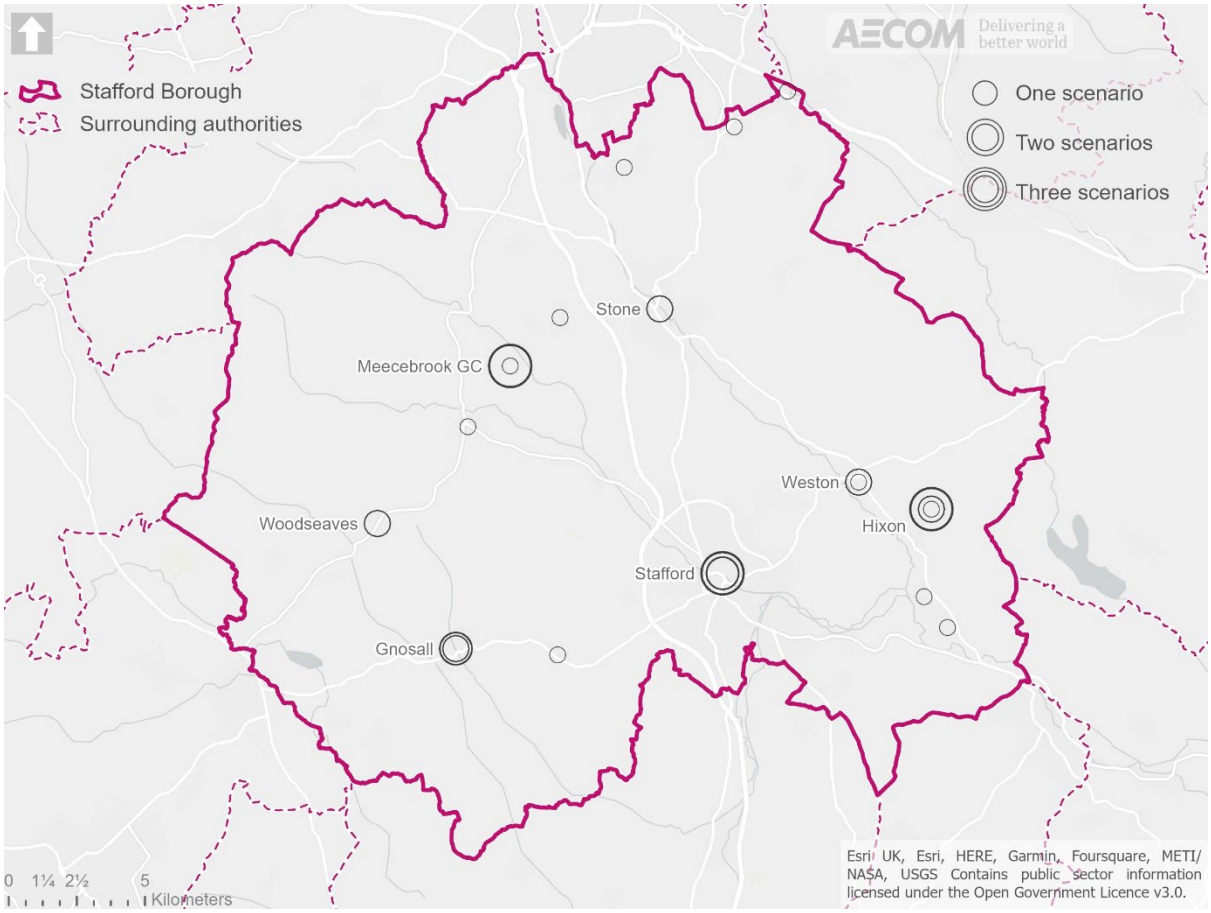


Table 5.5: The settlement scenarios identified in Appendix VI (new homes from allocations only)

Settlement	Site allocation	Total homes from allocations		
		Scenario 1	Scenario 2	Scenario 3
Stafford	Stafford Police Station	13	13	
	Land at Ashflats	268	268	
	Stafford Station Gateway	900	900	
	Beacon Hill	0	2,000	
	Total	**1,181**	**3,181**	
Stone	Stone Police Station	3		
	SCC depot, Newcastle Road	18		
	Land at Trent Road	20		
	Land to east of Oakleigh Court	131		
	Land at Marlborough Road	101		
	Land at Uttoxeter Road	97		
	Total	**370**		
Meecebrook	Meecebrook GC	0	3,000	
	Total	**0**	**3,000**	
Barlaston	-	**0**		
Blythe Bridge	-	**0**		
Eccleshall	-	**0**		
Gnosall	Land at Bank Top Garage	9	9	
	L/a Manor Farm Holding no 9	100	100	
	B/n A518 and disused railway	0	354	
	Total	**109**	**463**	
Great Haywood	-	**0**		
Haughton	-	**0**		
Hixon	Land north of Lea Road	0	45	0
	East of Church Land	0	83	0
	Hixon Airfield	0	0	1,985
	Total	**0**	**128**	**1,985**
Little Haywood and Colwich	-	**0**		
Meir Heath / Rough Close	-	**0**		
Weston	Land south of Green Road	0	33	
	Land south west of the A51	0	228	
	Total	**0**	**Up to 175**	
Woodseaves	3 x small sites	12		
	Land adjacent to the Croft	25		
	Rear Woodseaves C of E School	88		
	Total	**125**		
Yarnfield	-	**0**		
Tier 5 settlements	-	**0**		

5.5 Reasonable growth scenarios

Introduction

5.5.1 Having gone through a process (see Figure 5.1) involving consideration of strategic factors (Section 5.2), site options (Section 5.3) and settlement scenarios (Section 5.4), the final task is to draw together the understanding generated in order to arrive at a single set of reasonable growth scenarios.

5.5.2 In practice, this involves considering ways of combining the settlement scenarios introduced above, also mindful that additional supply will come from completions and commitments (7,045 homes) and from windfall sites (800 homes).[18] Total supply from these two sources is 7,845 homes.

Combining settlement scenarios

5.5.3 The starting point is a borough-wide growth scenario involving the lowest growth scenario across all sub-areas. As reported in Table 5.4, this would involve a total supply from allocations of 1,785 homes which, in combination with supply from completions, commitments and windfall (7,845 homes), would lead to a total supply figure of 9,630 homes. Under this scenario, there would be the potential to set the housing requirement at LHN (391 dpa x 20 years = 7,820 homes) with a supply buffer of 23%. Or, alternatively, the housing requirement might be set at 435 dpa with a supply buffer of 10%. However, on balance this supply scenario (regardless of which housing requirement is assumed) is judged to be unreasonable. This is because supporting the lowest growth scenario across all sub-areas would not amount to a suitably proactive strategy, in light of borough-wide strategic arguments for supporting growth.

5.5.4 With regards to higher growth scenarios, the first step is to consider the various scenarios involving higher growth at Gnosall (463 homes), Hixon (128 homes) and/or Weston (175 homes). Scenarios involving higher growth at Hixon without Weston, and vice versa, can be ruled out as unreasonable on the basis that there is a need to achieve a threshold level of growth that might serve to fund an extension to Weston Road Academy. However, that still leaves three potential growth scenarios (Gnosall, Hixon / Weston, or both). All three scenarios would enable the housing requirement to be set at 435 dpa with a supply buffer >10%, such that all three are *arguably* reasonable. However, there is a pragmatic need to keep the number of scenarios to a minimum (i.e. a manageable number for consultation). As such, only the highest growth of these three scenarios is taken forward, namely a scenario involving higher growth at Gnosall, Hixon and Weston combined. This would lead to 10,287 homes in total, which would enable the housing requirement to be set at 435 dpa with a supply buffer of 18%. This is **reasonable growth scenario 1**.

5.5.5 Next is a scenario involving *highest growth* at Hixon with lower growth elsewhere, leading to supply of 11,615 homes. This would enable a housing requirement of 435 dpa with a supply buffer of 33%, or a requirement of 535 dpa (2,000 homes unmet needs) with a supply buffer of 8%. An 8% supply buffer is potentially insufficient, such that there might be a need to provide for fewer than 2,000 homes unmet need. This is **reasonable growth scenario 2**.

5.5.6 Next is a scenario involving higher growth at Stafford with lower growth elsewhere. This would lead to 11,630, i.e. a figure very similar to that under reasonable growth scenario 2, such that the same arguments re. potential housing requirement figures apply. This is **reasonable growth scenario 3**.

5.5.7 Next are scenarios involving additional growth at Gnosall. Specifically: **reasonable growth scenario 4** would involve reasonable growth scenario 2 plus higher growth at Gnosall, leading 12,019 homes in total; and **reasonable growth scenario 5** would involve reasonable growth scenario 3 plus higher growth at Gnosall, leading 11,984 homes in total. Under both scenarios the housing requirement might be set at 435 dpa with a supply buffer of 37%, or 535 dpa (2,000 homes unmet need) with a supply buffer of 12%.

N.B. growth scenarios involving additional growth, over-and-above scenarios 2 and 3, at Hixon and Weston are unreasonable, due to secondary school capacity. Specifically, the Weston Road Academy, which serves the east of Stafford, Hixon and Weston, can expand to accommodate only 2,000 homes.

5.5.8 Finally, there is a need to consider scenarios involving Meecebrook Garden Community:

[18] Completions are sites that have been delivered since the start of the plan period. Commitments are sites with planning permission (either full or outline) or an existing allocation that can safely be carried forward into the new plan. Windfall sites are those that can be anticipated to come forward despite not having an allocation in the plan.

- **Reasonable growth scenario 6** - would involve Meecebrook alongside lower growth elsewhere, leading to 12,630 homes in total, e.g. a housing requirement of 535 dpa with a supply buffer of 18%. Reasonable growth scenario **6a** then involves an additional employment allocation (discussed below).
- **Reasonable growth scenario 7** - would involve Meecebrook alongside higher growth at Gnosall, leading to 12,984 homes in total, e.g. housing requirement of 535 dpa with a supply buffer of 21% Reasonable growth scenario **7a** then involves an additional employment allocation (discussed below).
- **Reasonable growth scenario 8** - would involve Meecebrook alongside higher growth at Stafford, leading to 14,630 homes in total, e.g. a housing requirement of 535 dpa with a supply buffer of 36%. Reasonable growth scenario **8a** then involves an additional employment allocation (discussed below).

N.B. growth scenarios involving Meecebrook alongside Hixon Airfield are ruled out as unreasonable because this would risk an oversupply of employment land, because Beacon Hill (i.e. 'higher growth' at Stafford) benefits from taking the form of an urban extension to Stafford, and because of a pragmatic need to keep the number of growth scenarios to a minimum (i.e. a manageable number for consultation). As for growth scenarios involving Meecebrook alongside 'higher growth' at Hixon and Weston, this is a reasonable option, but is not taken forward for appraisal with a view to minimising the number of scenarios.

5.5.9 The above discussion leads to **11 reasonable growth scenarios**, which are presented in Table 5.6 and across the subsequent maps. These are considered to be the 'reasonable' growth scenarios, for appraisal and consultation, at the current time. This is on the basis of the process set out across this section of the report as a whole (as summarised in Figure 5.1). Final points to note are as follows:

- There is invariably a need to make simplifying assumptions in order to arrive at a manageable number of scenarios and, in the case of Local Plan growth scenarios (defined to a level of detail that reflects plan objectives), it is fair to say that there is a need for *major* simplifying assumptions. It should be noted that *"the phrase all reasonable alternatives does not equate to all conceivable alternatives."*[19]
- It is important to recall the relatively early stage in the plan-making process. A number of the potential supply components discussed above are associated with a degree of uncertainty at this stage, but there will be greater clarity following consultation, and it is anticipated that additional potential sources of supply will also be identified and assessed prior to plan finalisation.
- Box 5.3 considers employment land supply under the 11 reasonable growth scenarios.

Box 5.3: Employment land supply options

As at 31 March 2022, a total of – 5.5 (minus) hectares of employment land have been delivered in the plan period 2020-2040. This reflects net losses combined with completions. There are currently 90.32 hectares of employment land with planning consent, together with 20.4 hectares of unconsented existing allocations. It should be noted that planning commitments includes 16.6 hectares as sui generis uses at the Meaford Power Station site. This gives a total of existing supply of 110.72 – 5.5 = 105.22 hectares.

On the basis of the evidence presented in the EHDNA (2020), this is sufficient to meet needs under all reasonable housing growth scenarios. Furthermore, there is a need to consider that both Meecebrook Garden Community and Hixon Airfield, if allocated, would deliver an additional ~15 ha of employment land.

In this light, there are limited arguments for one or more new stand-alone employment allocations. There is also a need to factor in the latest understanding in respect of a predicted slowdown in the national economy. However, on the other hand, there is a need to consider the possibility of unmet needs, as discussed at paragraph 5.2.42, above. Also, there is a need to consider the extremely high demand for / take-up of available land for warehousing locally over recent years. Evidence from May 2022 suggests that just 5% of employment units in the borough are vacant. A prime example of new warehousing development is the new Pets at Home facility at Redhill Business Park, Stafford, which was completed within around 18 months of planning permission.

On balance, there is considered to a reasonable argument for allocating one or more new employment sites, also mindful of the site options that are available and in contention for allocation. As discussed above, there are four shortlisted sites, of which the two better performing sites are SEI01 (a 5.6 ha extension to Ladfordfields Industrial Estate) and CRE02 (a 31.2 ha extension to Redhill Business Park).

With regards to the reasonable growth scenarios:

- allocation of SEI01 is assumed under all eleven of the reasonable growth scenarios; and
- additional allocation of CRE02 is explored as an option under the three higher housing growth scenarios.

[19] See https://www.aylesburyvaledc.gov.uk/sites/default/files/VALP/VALP%20Report.pdf#page=43

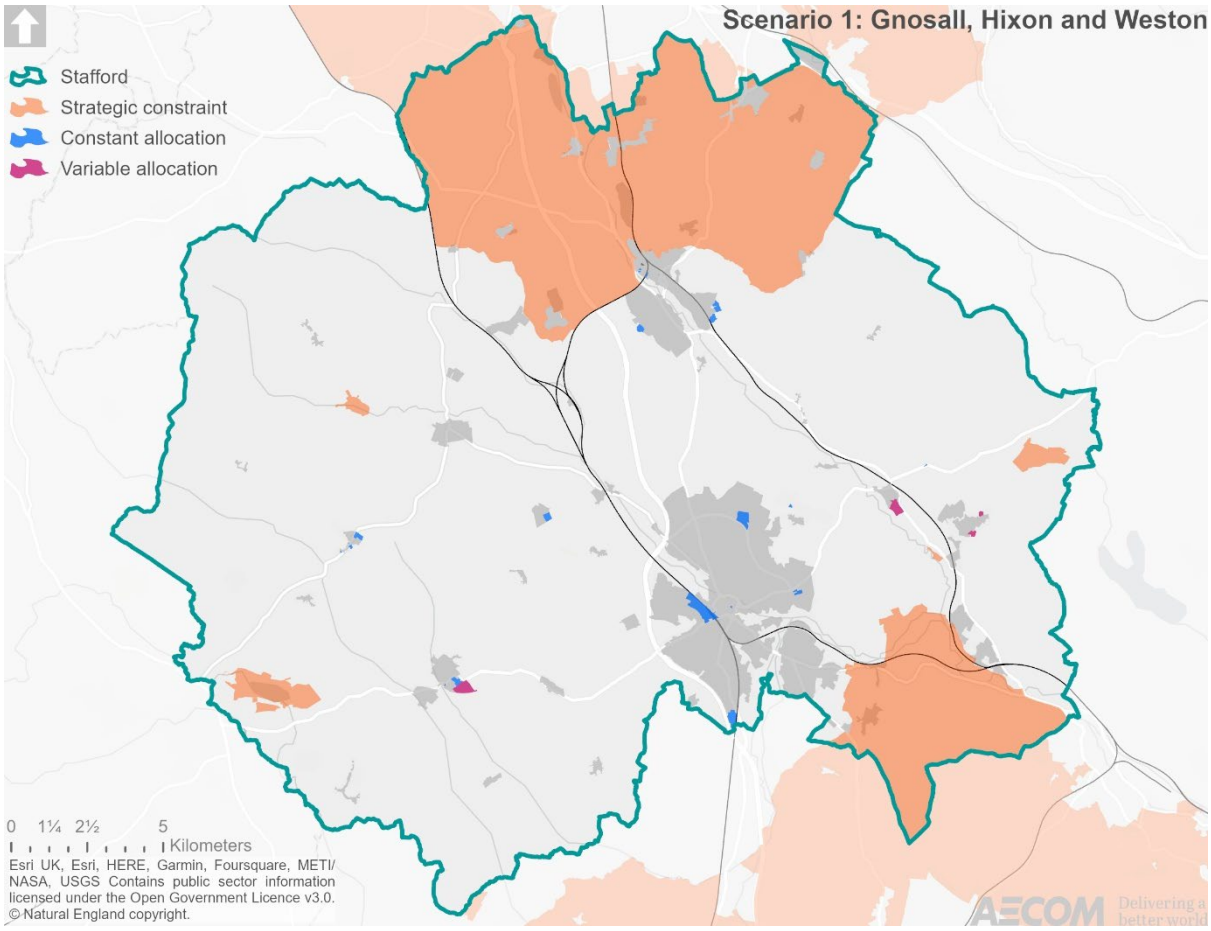
Table 5.6: The reasonable growth scenarios (with constants greyed-out and high growth indicated with blue text)

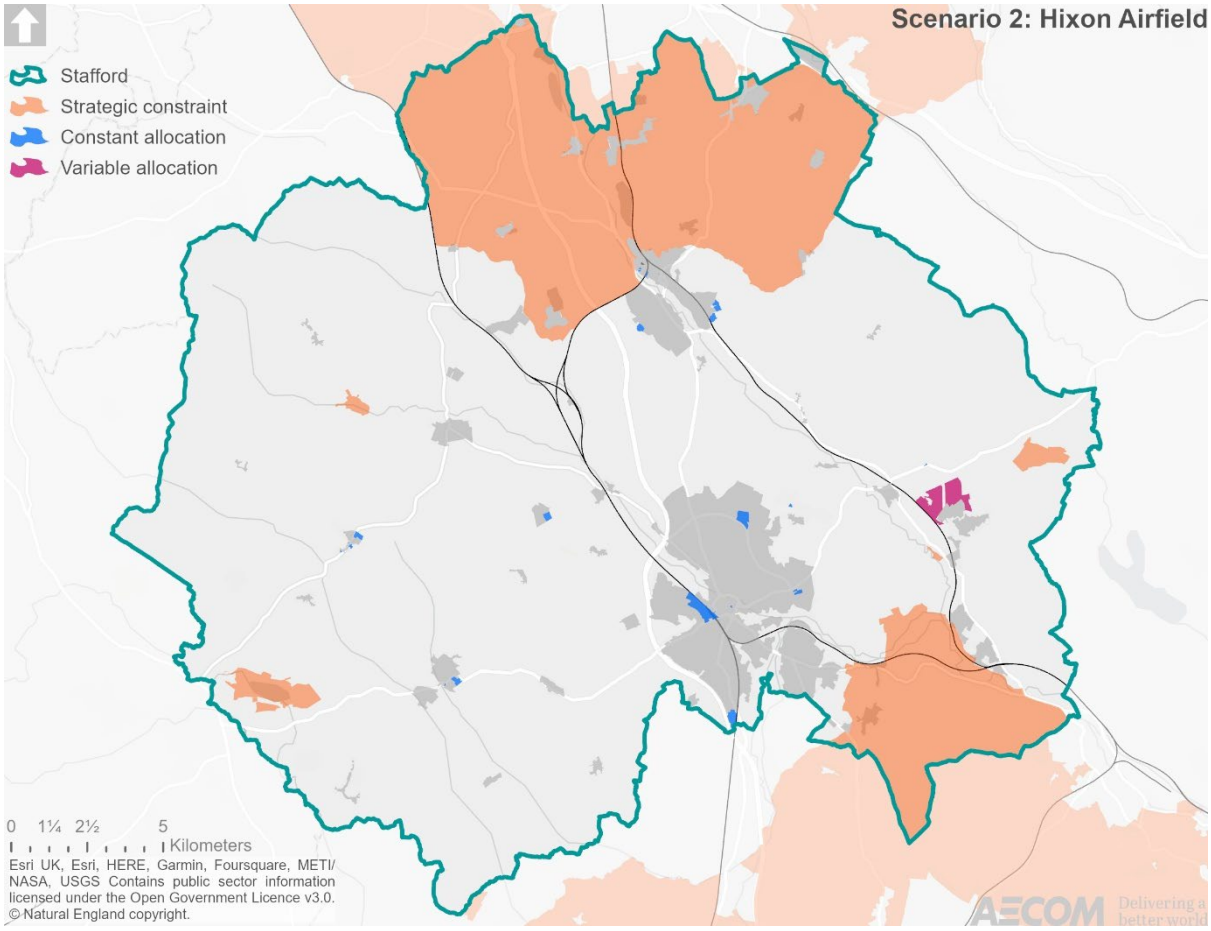
Scenario		1	2	3	4	5	6	6a	7	7a	8	8a
Completions / commitments[20]		7,045	7,045	7,045	7,045	7,045	7,045	7,045	7,045	7,045	7,045	7,045
Windfall		800	800	800	800	800	800	800	800	800	800	800
Allocations	Stafford	1,181	3,181	1,181	3,181	1,181	1,181	1,181	1,181	1,181	3,181	3,181
	Stone	370	370	370	370	370	370	370	370	370	370	370
	Meecebrook	0	0	0	0	0	3000	3000	3000	3000	3000	3000
	Gnosall	463	109	109	463	463	109	109	463	463	109	109
	Hixon	128	0	1985	0	1985	0	0	0	0	0	0
	Weston	175	0	0	0	0	0	0	0	0	0	0
	Woodseaves	125	125	125	125	125	125	125	125	125	125	125
	Other villages	0	0	0	0	0	0	0	0	0	0	0
Total new homes		**10,287**	**11,615**	**11,630**	**11,969**	**11,984**	**12,630**	**12,630**	**12,984**	**12,984**	**14,630**	**14,630**
Per annum (pa)		**514**	**581**	**582**	**598**	**599**	**632**	**632**	**649**	**649**	**732**	**732**
% above 435 pa*		**18**	**33**	**33**	**37**	**37**	**45**	**45**	**49**	**49**	**68**	**68**
% above 535 pa*		**-4**	**8**	**8**	**12**	**12**	**18**	**18**	**21**	**21**	**36**	**36**
New emp land (ha)		**5**	**5**	**15**	**5**	**15**	**20**	**51**	**20**	**51**	**20**	**51**

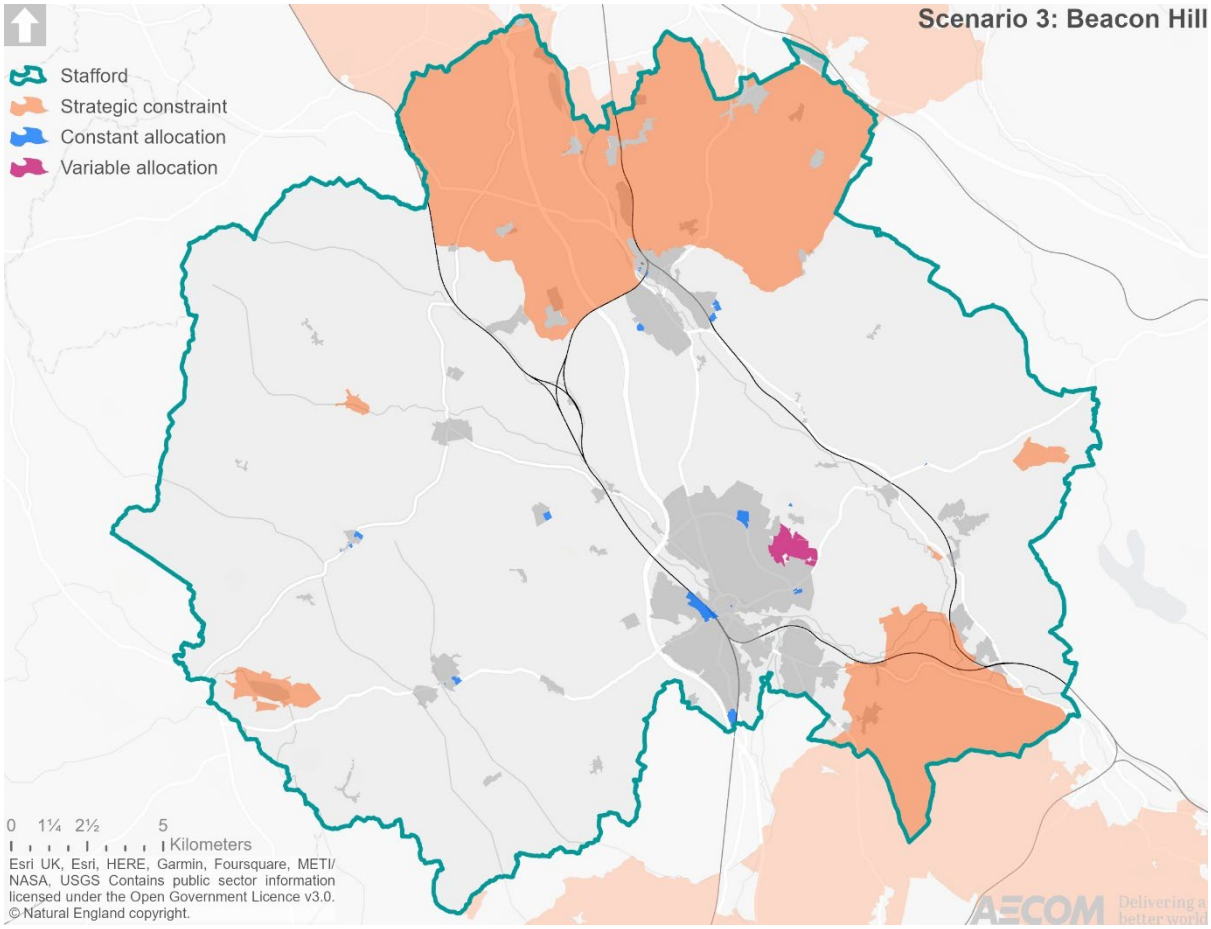
* Explanation of shading:

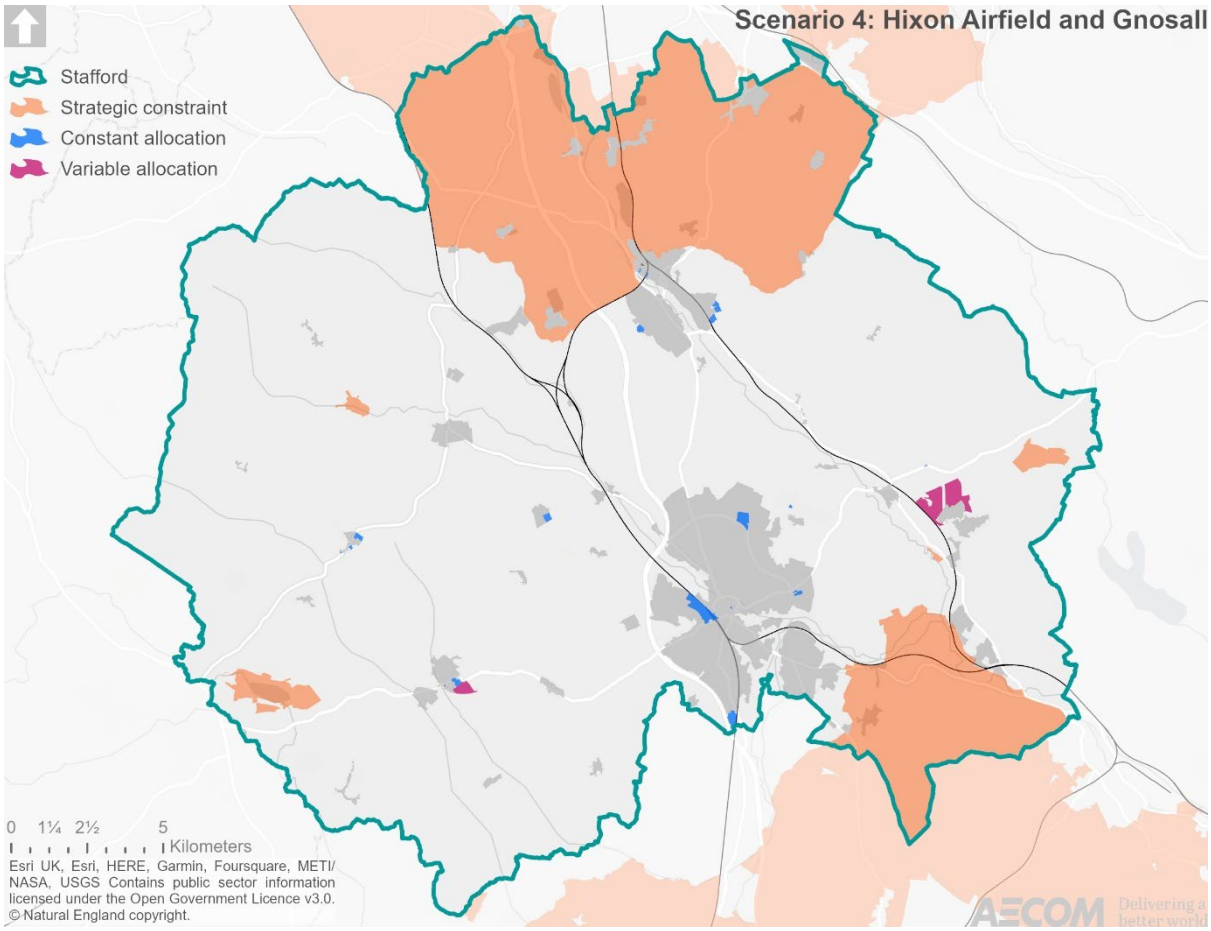
- Red – indicates a scenario with no supply buffer
- Amber – indicates a scenario an insufficient supply;
- Light green –indicates a sufficient supply buffer;
- Dark green – indicates a supply buffer that is likely more than sufficient.

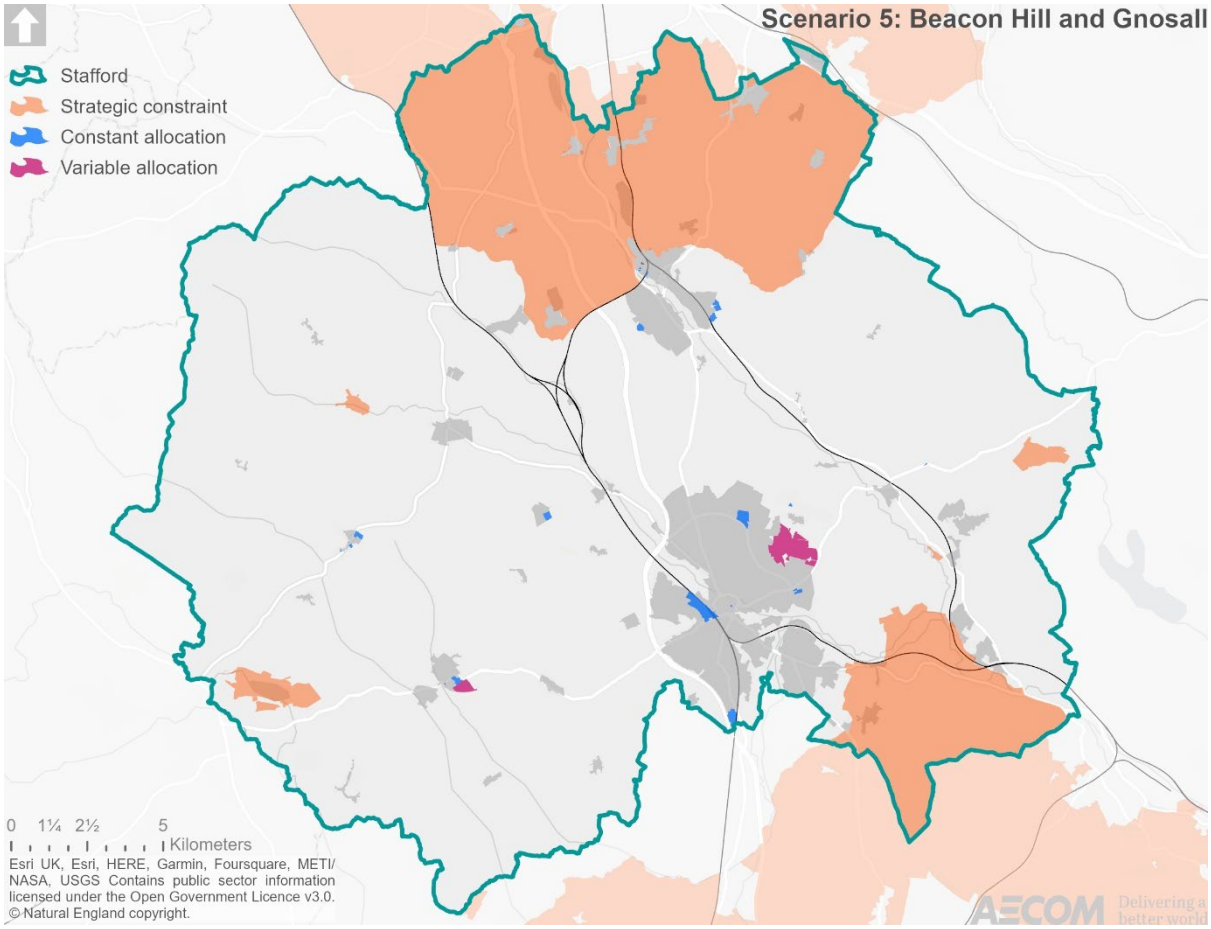
[20] At at 31st March 2022

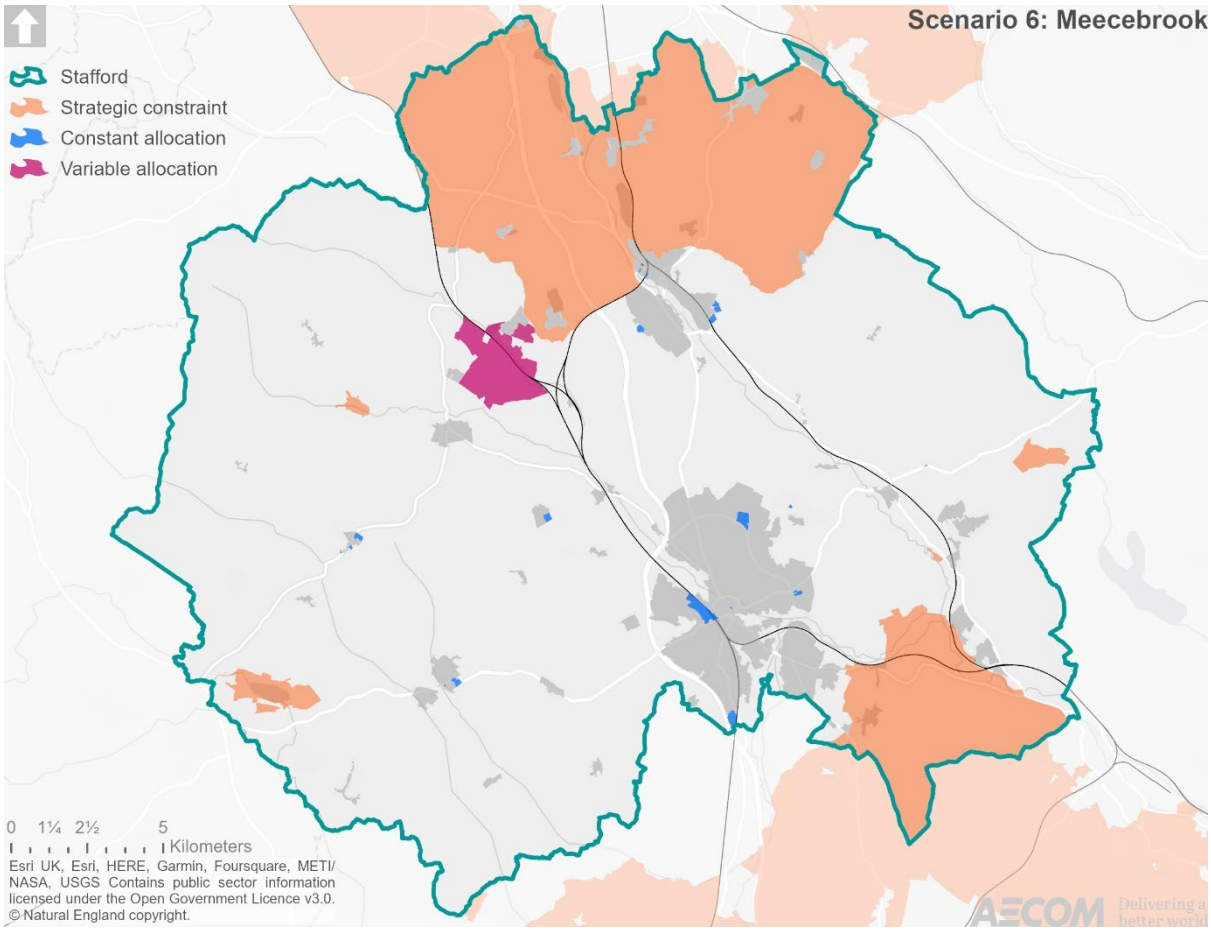

Scenario 1: Gnosall, Hixon and Weston
Stafford
Strategic constraint
Constant allocation
Variable allocation
0 1¼ 2½ 5
Kilometers
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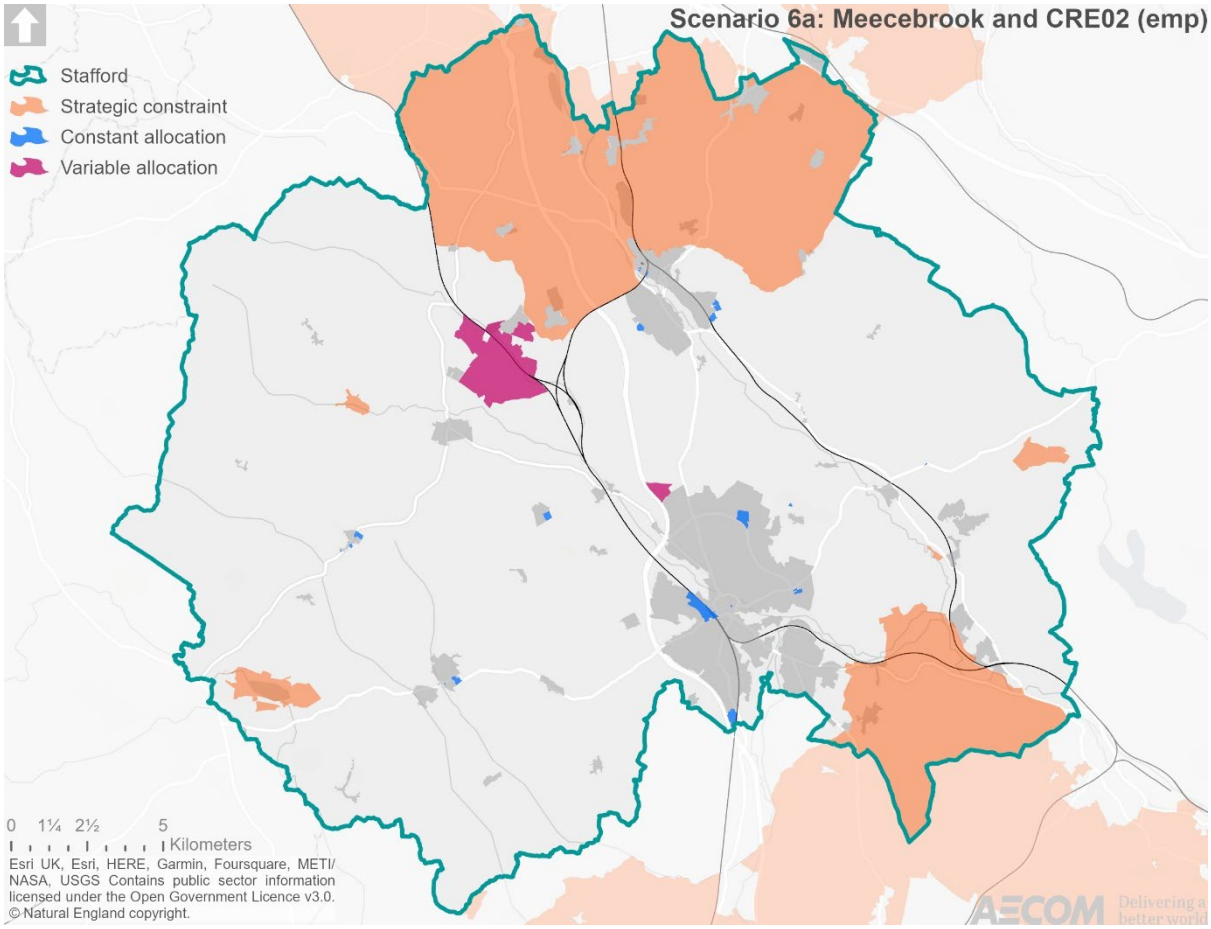

Scenario 2: Hixon Airfield
Stafford
Strategic constraint
Constant allocation
Variable allocation
0 1¼ 2½ 5
Kilometers
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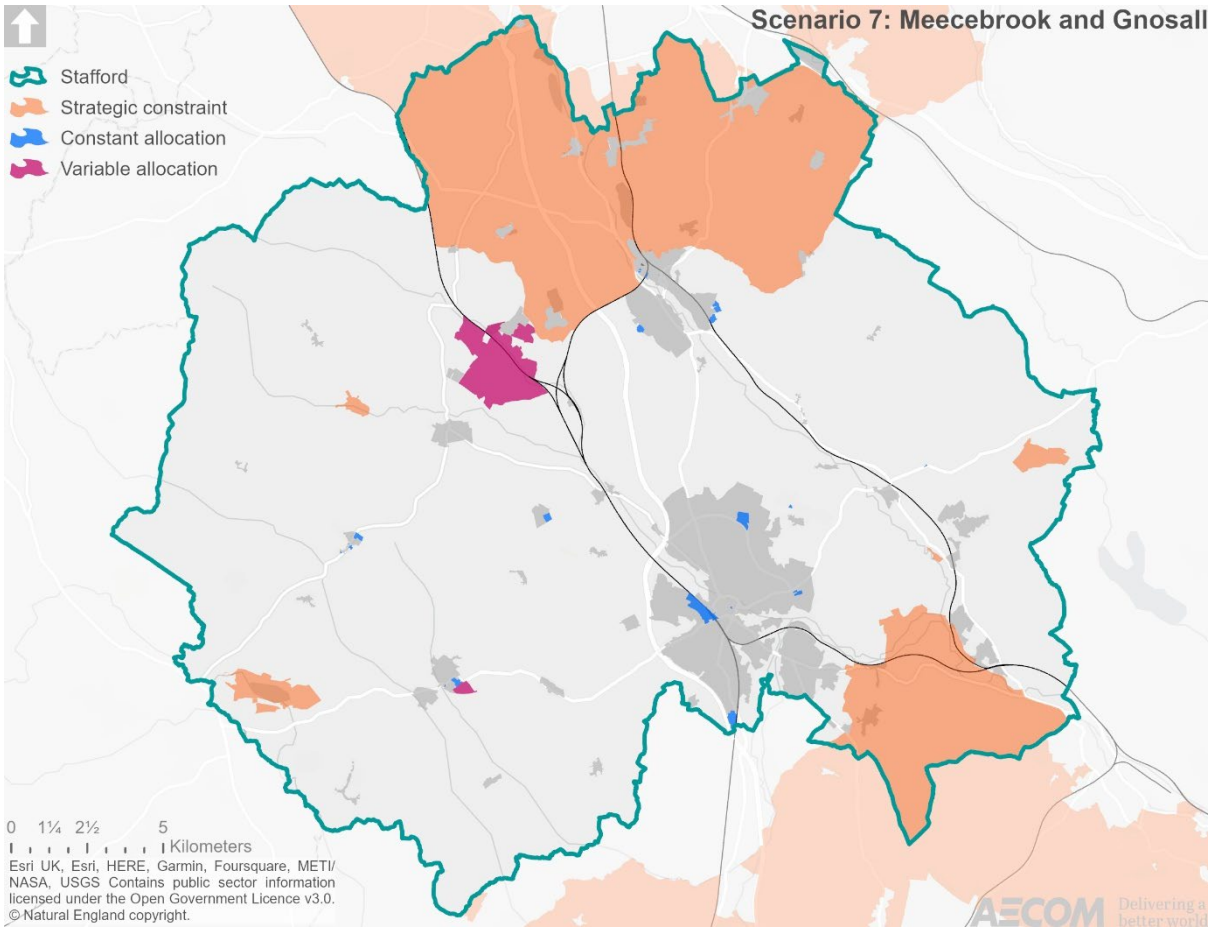

Scenario 3: Beacon Hill
Stafford
Strategic constraint
Constant allocation
Variable allocation
0 1¼ 2½ 5
Kilometers
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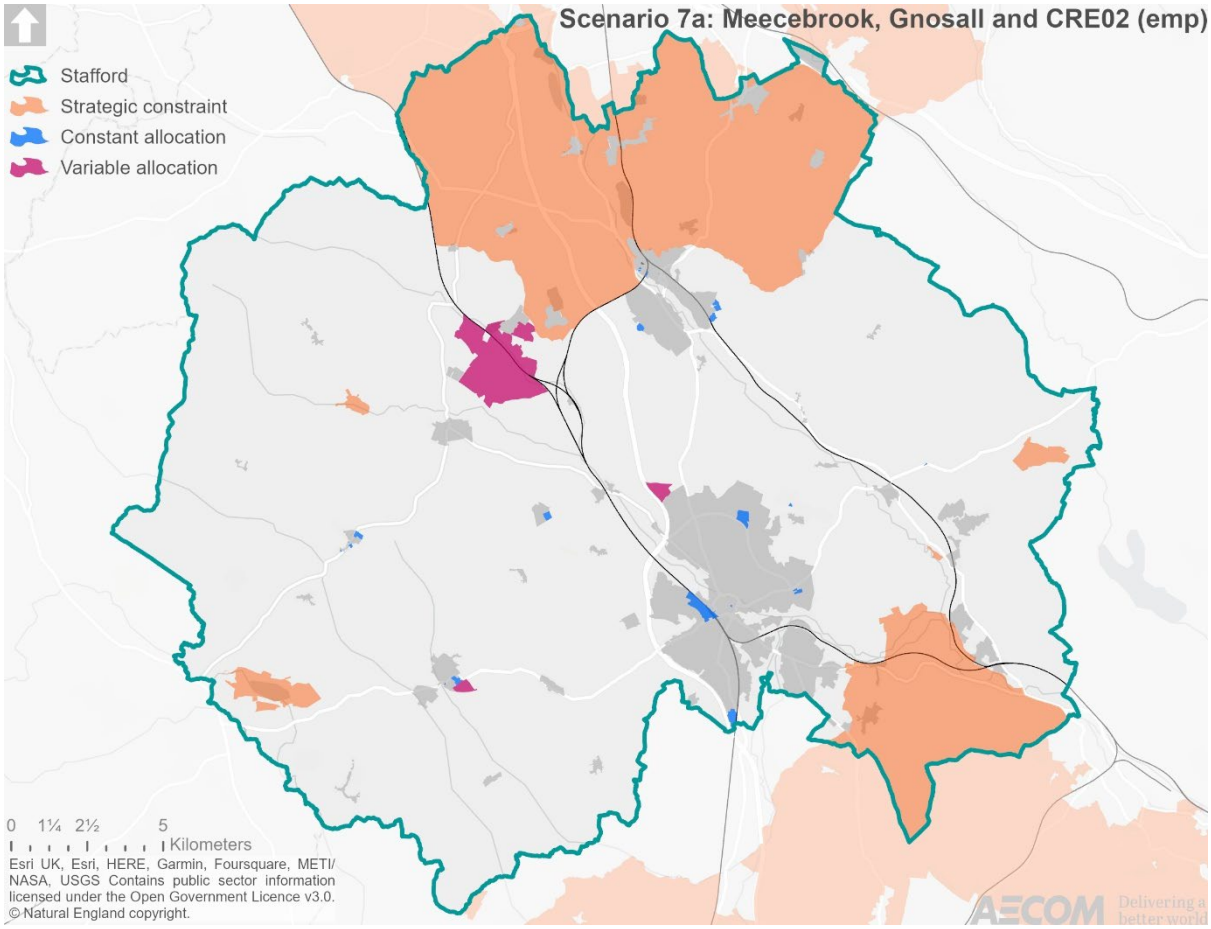

Scenario 4: Hixon Airfield and Gnosall
Stafford
Strategic constraint
Constant allocation
Variable allocation
0 1¼ 2½ 5
Kilometers
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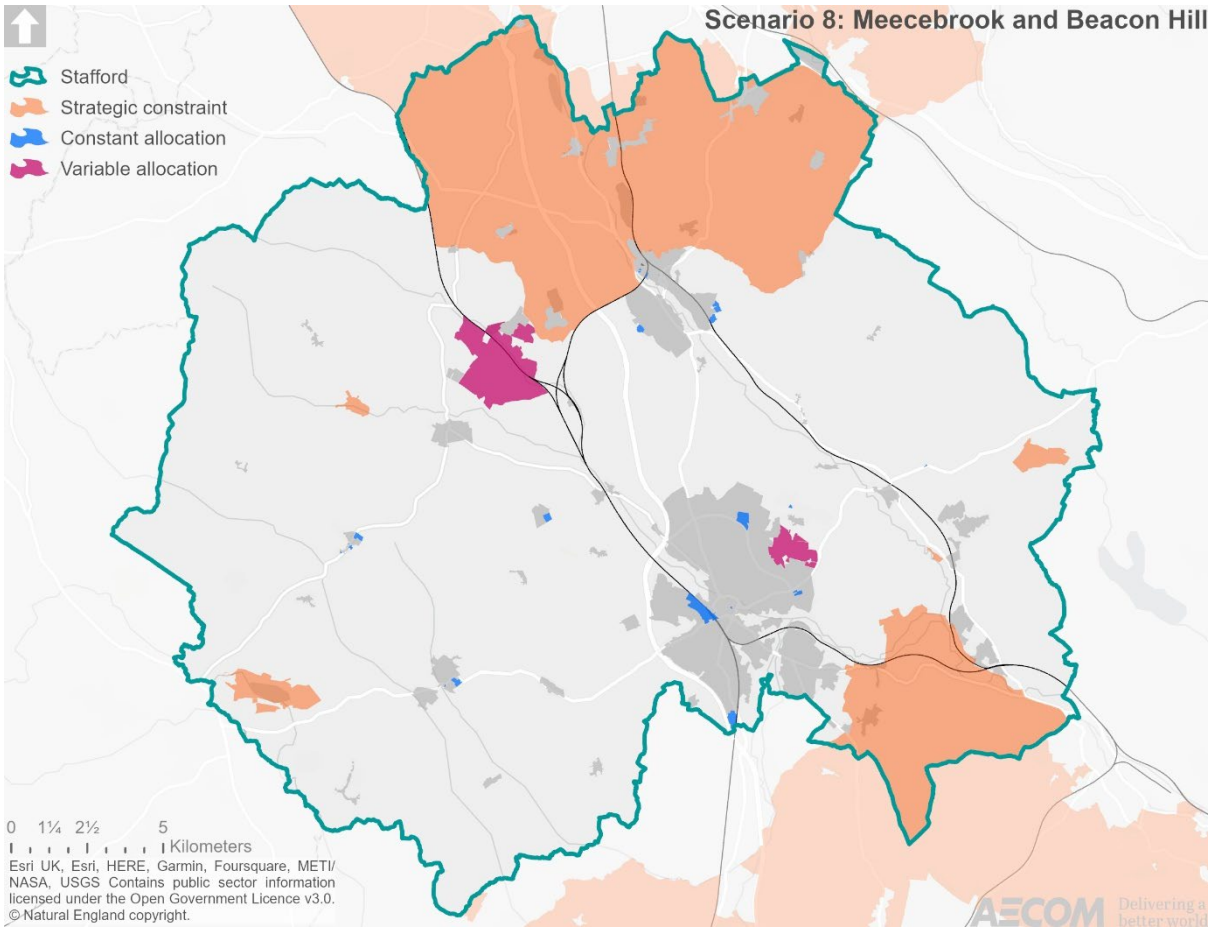

Scenario 5: Beacon Hill and Gnosall
Stafford
Strategic constraint
Constant allocation
Variable allocation
0 1¼ 2½ 5
Kilometers
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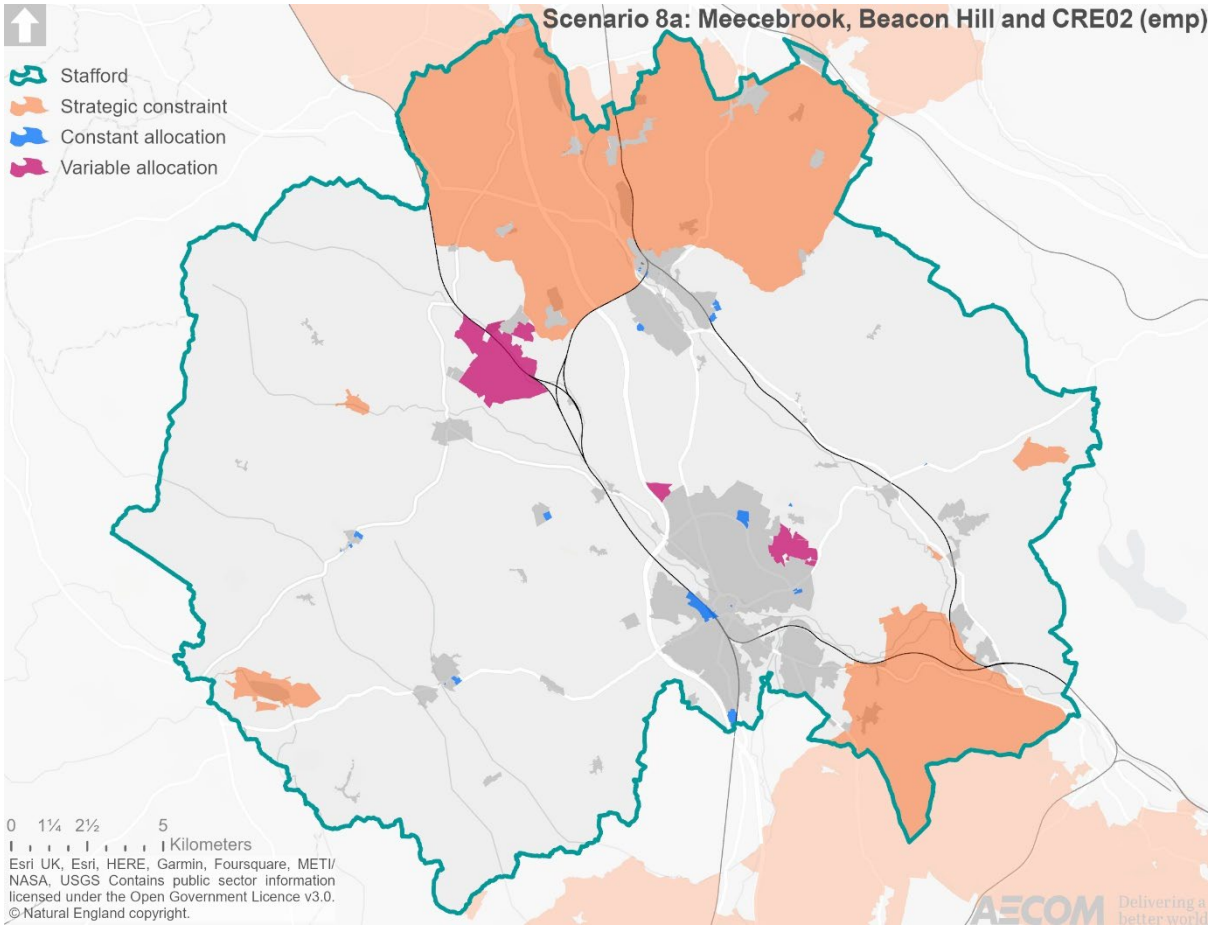

Scenario 6: Meecebrook
Stafford
Strategic constraint
Constant allocation
Variable allocation
0 1¼ 2½ 5
Kilometers
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Scenario 6a: Meecebrook and CRE02 (emp)
Stafford
Strategic constraint
Constant allocation
Variable allocation
0 1¼ 2½ 5
Kilometers
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Scenario 7: Meecebrook and Gnosall
Stafford
Strategic constraint
Constant allocation
Variable allocation
0 1¼ 2½ 5
Kilometers
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Scenario 7a: Meecebrook, Gnosall and CRE02 (emp)
Stafford
Strategic constraint
Constant allocation
Variable allocation
0 1¼ 2½ 5
Kilometers
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Scenario 8: Meecebrook and Beacon Hill
Stafford
Strategic constraint
Constant allocation
Variable allocation
0 1¼ 2½ 5
Kilometers
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A view of Brindley Heath, part of the Cannock Chase AONB

6 Growth scenarios appraisal

6.1 Introduction

6.1.1 The aim of this section is to present a summary appraisal of the reasonable growth scenarios introduced above and further introduced in Table 6.1. Detailed appraisal findings are presented in **Appendix VII**.

Table 6.1: The reasonable growth scenarios – summary

Scenario *Completions, commitments, windfall, constant allocations plus growth or higher growth at…*		Total homes (2020-2040)	Homes per annum	New employment allocations
1	Gnosall, Hixon and Weston	10,287	514	5
2	Hixon Airfield	11,615	581	15
3	Beacon Hill	11,630	581	5
4	Hixon Airfield and Gnosall	11,969	598	15
5	Beacon Hill and Gnosall	11,984	599	5
6	Meecebrook	12,630	632	20
6a	Meecebrook	12,630	632	51
7	Meecebrook and Gnosall	12,984	649	20
7a	Meecebrook and Gnosall	12,984	649	51
8	Meecebrook and Beacon Hill	14,630	732	20
8a	Meecebrook and Beacon Hill	14,630	732	51

6.2 Summary appraisal findings

6.2.1 Summary appraisal findings are presented within Table 6.2. Within each row (i.e. for each of the topics that comprise the SA framework – see Section 3) the columns to the right hand side seek to both rank the scenarios in order of performance (where a rank of one indicates best performing) and categorise the performance of each scenario in terms of 'significant effects' using red / amber / light green / green.[21]

6.2.2 Further points to note on methodology are as follows:

- Constant sites – when ranking the scenarios in order of performance the focus is on the sites that are a 'variable' across the scenarios, although sites that are a 'constant' are taken into account when reaching conclusions on significant effects. Constant sites are a focus of appraisal in Section 9 of this report.
- Assumptions – there is a need to make a range of assumptions, e.g. around the nature of schemes that would come forward, infrastructure delivery, planning gain etc. The appraisal presented here, and in more detail in Appendix VII, aims to strike a balance between exploring and explaining assumptions on the one hand whilst, on the other hand, ensuring conciseness and readability in support of engagement.
- Site specific materials – limited account has been taken of site specific materials (e.g. submitted by site promoters) at this stage, but there will be the potential to take account of such materials at the next stage (Regulation 19). There is a need for caution as developer proposals are subject to change.

[21] **Red** indicates a significant negative effect; **amber** a negative effect of limited or uncertain significance; **light green** a positive effect of limited or uncertain significance; and **green** a significant positive effect. No colour indicates a neutral effect.

Table 6.2: The reasonable growth scenarios – summary appraisal findings

	1	2	3	4	5	6	6a	7	7a	8	8a
Scenario *Constants plus growth / higher growth at…*	Gnosall, Hixon and Weston	Hixon Airfield	Beacon Hill	Hixon Airfield and Gnosall	Beacon Hill and Gnosall	Meecebrook		Meecebrook and Gnosall		Meecebrook and Beacon Hill	
Topic	Rank of preference and categorisation of effects										
Air quality	3	3	1	3	2	1	3	2	3	1	2
Biodiversity	4	4	3	4	2	1	1	1	1	1	1
Climate change adaptation	=	=	=	=	=	=	=	=	=	=	=
Climate change mitigation	5	3	3	4	4	1	1	3	3	2	2
Communities	3	2	2	2	2	1	1	1	1	1	1
Economy	4	3	4	3	4	2	1	2	1	2	1
Health and wellbeing	=	=	=	=	=	=	=	=	=	=	=
Historic environment	3	1	1	1	1	2	2	2	2	2	2
Housing	6	5	5	4	4	3	3	2	2	1	1
Land	2	1	1	2	2	2	2	2	2	2	2
Landscape	2	1	4	1	4	3	3	3	3	5	5
Transport	6	5	4	3	3	2	2	2	2	1	1
Water	=	=	=	=	=	=	=	=	=	=	=

Discussion

A headline finding is that **higher growth scenarios** perform well, in absolute and/or relative terms, under the majority of those topics where it is possible to differentiate between the scenarios. This broadly reflects:

- support for directing growth to a large garden community at Meecebrook; and
- support for providing for unmet needs in broadly suitable locations, in the knowledge that the effect would be to reduce pressure on other locations elsewhere in the sub-region that could well be less suitable.

In contrast, **Scenario 1** is found to perform relatively poorly under all topics bar 'landscape', with no positive effects predicted, as it is the lowest growth scenario and would involve a package of smaller allocations, in place of a strategic growth location, leading to opportunities missed around infrastructure and wider 'planning gain'.

The appraisal findings in respect of Scenario 1 are such that it is fair to say that it is found to perform poorly overall, potentially to the extent that it is 'unreasonable'. However, focusing on **the other ten scenarios**, it is *not* fair to say that the appraisal finds higher growth scenarios to be preferable overall.[22]

Having made these initial points, the following bullet points consider each of the topic headings in turn:

- **Air quality** – the order of preference reflects: relative support for Beacon Hill, as an urban extension well connected to the strategic road network, albeit MOD and employment land is a barrier to connectivity; support for Meecebrook, as part of a strategy that leads to flexibility to provide for unmet needs; and the importance of balancing housing and employment growth locally, in order to avoid problematic levels of in-commuting (N.B. the latter is a complex topic area, with clarity anticipated following further work prior to plan finalisation).
- **Biodiversity** - the order of preference and conclusions on significant effects reflect: a concern with Hixon Airfield (also possibly growth at Weston), given proximity to an important wetland site; and support for providing for unmet needs in locations that give rise to relatively limited concerns, in the knowledge that this may reduce pressure on more sensitive locations elsewhere within the sub-region, e.g. close to Cannock Chase SAC. With regards to the six best performing scenarios, there is an argument for predicting positive effects on the baseline, given good net gain potential at strategic sites, and given identified opportunities at both Meecebrook (in particular) and Beacon Hill. However, there is much uncertainty at this early stage.
- **Climate change adaptation** - it is not possible to differentiate between the growth scenarios, with any certainty, in respect of flood risk. All three of the strategic site options are associated with river / stream valleys, but there is little reason to suggest that flood risk would create a major challenge to effective masterplanning, such that there could be pressure to accept any risk. Nor is it possible to differentiate in respect of wider adaptation factors (e.g. overheating risk), albeit there can be an opportunity at strategic sites. With regards to significant effects, there is a need to recall the package of proposed allocations that are a 'constant' across the scenarios, which include a notable site associated with flood risk (Stafford Gateway).
- **Climate change mitigation** – focusing on built environment emissions (with transport emissions a focus of discussion under other headings), the primary consideration is support for directing growth to strategic sites, and larger strategic sites in particular. Meecebrook is considered to represent a clear opportunity; however, there is a need for further work to demonstrate why the site is an appropriate location to focus strategic growth, from a decarbonisation perspective, and explain how decarbonisation objectives fit with the scheme vision, masterplanning principles etc. There is also a need for further work on viability to understand tensions between decarbonisation and wider objectives, e.g. affordable housing, transport and infrastructure. With regards to significant effects, there is a need to recall the package of proposed allocations that are a 'constant' across the growth scenarios, which includes smaller sites not likely to be associated with any particular built environment decarbonisation opportunity; and there is a need to gauge performance in the context of the Borough's ambitious target of achieving net zero greenhouse gas emissions by 2040, which is a fairly ambitious target (albeit it is quite common for local authorities to set 2030 as a net zero target date).
- **Communities** - the key consideration is that Meecebrook represents a significant opportunity, and there is also potentially a notable opportunity to deliver new community infrastructure at Hixon to the benefit of the wider village, although there could also be negative effects felt by the existing community, and there are challenges around secondary school provision. With regards to Beacon Hill, the possibility to make land available for a secondary school (yet to be confirmed) is noted, as is the proposed large country park, plus the site benefits from *relatively* good connectivity to the Stafford. With regards to the variable package of smaller sites, the potential for expansion of Gnosall to deliver a primary school expansion is noted.

[22] This is because the appraisal is undertaken without any assumptions made regarding the weight, or degree of importance in the decision making process, that should be assigned to each topic, nor is it fair to assume that the topics are of equal weight. The appraisal does serve to highlight concerns with higher growth, under certain topic headings, and the Council – as the decision-makers – might choose to assign particular weight to one or more of these in the 'planning balance'. Also, in respect of any given topic, it is important to recall that the appraisal is not a scientific exercise, in that it reflects a range of judgements.

With regards to significant effects, 'moderate or uncertain significant positive effects' are predicted for scenarios involving Meecebrook. There is clear potential to upgrade this conclusion ahead of plan finalisation.

- **Economy** - strong recent demand for / uptake of employment land, along with a risk of unmet needs from elsewhere, provides an argument for allocating new employment land through the local plan, including at sites that are a variable across the scenarios, including at a mixed use new settlement (Meecebrook or Hixon Airfield) and/or at CRE02 (an extension to the successful Redhill Business Park). However, there is uncertainty ahead of an update to the Economic and Housing Development Needs Assessment (EHDNA). In simple quantitative terms the current evidence suggests a risk of an over-supply, but there are a range of qualitative considerations, for example around shifts in jobs density / automation at warehousing sites.
- **Health and wellbeing** - there are clear arguments for supporting strategic growth locations over-and-above smaller urban extensions. However, on balance, the scenarios are judged to perform broadly on a par. With regards to significant effects, there are wide ranging positives effects and potential tensions, mindful of the wide range of health determinants, but significance is potentially somewhat limited.
- **Historic environment** - there is support for growth at Hixon Airfield (in particular) and Beacon Hill, and there is also an argument for scenarios including Meecebrook, as this area is subject to relatively limited historic environment constraint in the context of new settlement options of this scale (subject to further investigation, e.g. in respect of traffic through Eccleshall), plus allocation could potentially serve to reduce development pressure on constrained locations elsewhere sub-regionally. With regards to significant effects, on balance, it is considered appropriate to flag 'moderate or uncertain' negative effects only for Scenario 1, given concerns in respect of growth close to two conservation areas (Gnosall and the Trent and Mersey Canal).
- **Housing** - there is a clear need to rank the growth scenarios according to total quantum. With regards to significant effects, on balance, significant positive effects are predicted for those scenarios that would enable provision for unmet needs in quantitative terms, although there is also a need to consider whether growth locations would be suited to meeting unmet needs, in transport connectivity terms. Even the lowest growth scenario potentially represents a proactive approach, as the housing requirement would be set at a figure above LHN (likely 435 dpa) leading to additional delivery of affordable housing to meet identified needs.
- **Land** – there is a degree of support for directing growth to Hixon Airfield or Beacon Hill, from a perspective of seeking to minimise loss of Best and Most Versatile (BMV) agricultural land. However, there is also an argument for supporting higher growth, given concentrations of BMV land elsewhere in the sub-region. With regards to significant effects, the quantum of agricultural land lost to development could be judged significant.
- **Landscape** – on balance higher growth is judged to give rise to a concern, albeit the effect would certainly be to reduce pressure on one or both of the sub-region's Green Belts. There is support for Hixon Airfield, a concern with Beacon Hill (in particular) and Meecebrook, and also a degree of concern with smaller sites at Hixon and Weston. On balance, scenarios involving CRE02 are not judged to perform worse than those without, but there is some uncertainty. With regards to significant effects, there is a need to recall the package of proposed allocations that are a 'constant' across the growth scenarios, which includes some associated with a degree of sensitivity. On balance, it is appropriate to predict negative effects on the baseline (which, to reiterate, is one whereby there is continued development pressure locally, and increased development pressure elsewhere in the sub-region given unmet housing needs) for those scenarios without Hixon Airfield.
- **Transport** - the key consideration here is judged to be supporting higher growth scenarios, such that there is flexibility to provide for unmet needs (subject to a decision on locally arising needs, including to reflect market signals). Gnosall is not considered to be a strongly performing location from a perspective of meeting unmet needs, but otherwise is associated with a degree of merit, including a good bus service. Beacon Hill is judged preferable to Hixon Airfield, but has its transport challenges. With regards to significant effects, there is a need to recall the 'constant' allocations, for example: Stafford Station Gateway (strongly supported); Land at Ashflats (well connected to the M6, but less so Stafford town centre); and Woodseaves (a rural settlement, distant from higher order centres). On balance, 'moderate or uncertain positive effects' are predicted under scenarios that would lead to clear potential to provide for unmet needs; however, all of the scenarios are associated with uncertainties at this stage, e.g. with limited transport modelling having been completed.
- **Water** - there is support for strategic schemes, and larger strategic schemes in particular, which suggests a degree of support for Meecebrook, plus there may be a degree of locational opportunity, noting association with the Meece Brook. However, it is too early to conclude support for Meecebrook with any certainty, ahead of further evidence-gathering and discussions with the water company and the Environment Agency. With regards to significant effects, there is a clear need to flag 'moderate or uncertain negative effects' at this current stage, taking a precautionary approach ahead of consultation and further work, including potentially a detailed water cycle study to update the scoping study completed in 2020. It is recognised that good management of water resources and water quality is high on the national agenda at the current time.

7 The preferred approach

7.1 Introduction

7.1.1 As discussed, it is not the role of the appraisal to arrive at a conclusion on which of the growth scenarios is best, or 'most sustainable' overall. Rather, it is the role of the plan-making authority to arrive at that conclusion, informed by the appraisal. This section presents the response of SBC to the appraisal.

7.2 Selecting the preferred scenario

7.2.1 The following statement explains SBC officers' reasons for supporting **Growth Scenario 6a**. It is important to be clear that the statement below is not an 'appraisal' in the SA sense.

Statement provided by officers

7.2.2 Under reasonable growth scenario 6a the housing supply (630 dpa) is sufficient to enable housing requirement to be set at 535 dpa, reflecting 435 dpa locally arising need (LHN uplifted to reflect market signals in respect of employment growth) plus 100 dpa unmet needs (2,000 homes in total). There is a need for further discussions with relevant local planning authorities in respect provision for unmet needs.

7.2.3 With regards to employment land, the proposal is to allocate significant additional land through the local plan, leading to a total supply of 156 ha. At the current time, this is considered to be an appropriate level of supply, given the risk of some of this supply not coming forward in practice, and also the risk of some existing employment land being lost. However, it is recognised that there is a need to avoid an over-supply relative to housing growth. An update to the Economic and Housing Development Needs Assessment (EHDNA) will be undertaken subsequent to the consultation in order to explore this further.

7.2.4 The appraisal shows growth scenario 6a to perform well in a number of respects, with a ranking of "1" under four topic headings, and positive effects on the baseline predicted under four headings. A number of the key benefits relate to the broad strategy and support for a new settlement at Meecebrook, which has clear potential to deliver a range of benefits, including new community infrastructure (reducing the pressure on existing infrastructure, particularly schools and GPs) employment land and a new rail station.

7.2.5 However, the appraisal also serves to highlight a number of tensions with sustainability objectives, and drawbacks relative to alternative growth scenarios. In particular:

- Air quality – the appraisal finding reflects a risk of an imbalance between housing and employment growth potentially leading to unsustainable commuting patterns. However, the appraisal finding reflects the precautionary principle at this early stage. As discussed, further detailed work will be undertaken.
- Historic environment – the appraisal reflects a degree of concern with Meecebrook Garden Community, but there is confidence in the ability to address concerns through masterplanning, design etc, including through a Masterplan Supplementary Planning Document (SPD) in consultation with Historic England.
- Housing – the appraisal naturally favours higher growth scenarios, i.e. scenarios whereby the housing requirement could be set *above* 535 dpa to meet more locally arising needs (including affordable housing, and possibly in response to employment growth / market signals) and/or to meet more unmet needs from one or both of the constrained urban conurbations to the north and south of the borough. However, there are clear draw-backs to higher growth, and it is believed a housing requirement of 535 dpa represents a good balance and a proactive approach to boosting housing supply.
- Land – it is accepted that Hixon Airfield, and potentially also Beacon Hill, are likely preferable locations for strategic growth from a perspective of wishing to minimise loss of best and most versatile (BMV) agricultural land. However, both sites are associated with a range of drawbacks relative to Meecebrook.
- Landscape – it is accepted that Hixon Airfield performs well, as a potential location for strategic growth, from a landscape perspective. However, once again, there are a range of drawbacks to growth here, and a number of reasons why a strategy involving a focus of growth at Meecebrook is preferable.
- Transport – the appraisal supports Meecebrook, on the assumption of a train station, but suggests a higher growth scenario is preferable, given the importance of meeting unmet needs in broadly suitable locations. The highest growth scenario, favoured by the appraisal, would see allocation of Beacon Hill in addition to Meecebrook, but this site is not without its transport challenges.

Part 2: What are the appraisal findings at this stage?

8 Introduction to Part 2

8.1.1 The aim of this part of the report is to present an appraisal of the draft ('preferred options') version of the local plan, as currently published for consultation.

8.1.2 In practice, the appraisal builds upon the appraisal of Growth Scenario 6a presented in Section 6. Specifically, the appraisal revisits the appraisal of Growth Scenario 6a with added consideration given to:

- site allocations that are a 'constant' across the growth scenarios appraised in Section 6; and
- draft policies (both borough-wide and site-specific).

Overview of the plan

8.1.3 The plan presents 53 policies under the following headings:

- Development strategy and climate change response
- Meecebrook Garden Community
- Site allocation policies
- Economy policies
- Housing policies
- Design and infrastructure policies
- Environment policies
- Connections policies

8.1.4 The appraisal focuses on policies under the first two headings, whilst also considering how other policies will serve to mitigate the impacts of growth and ensure that growth-related opportunities are realised.

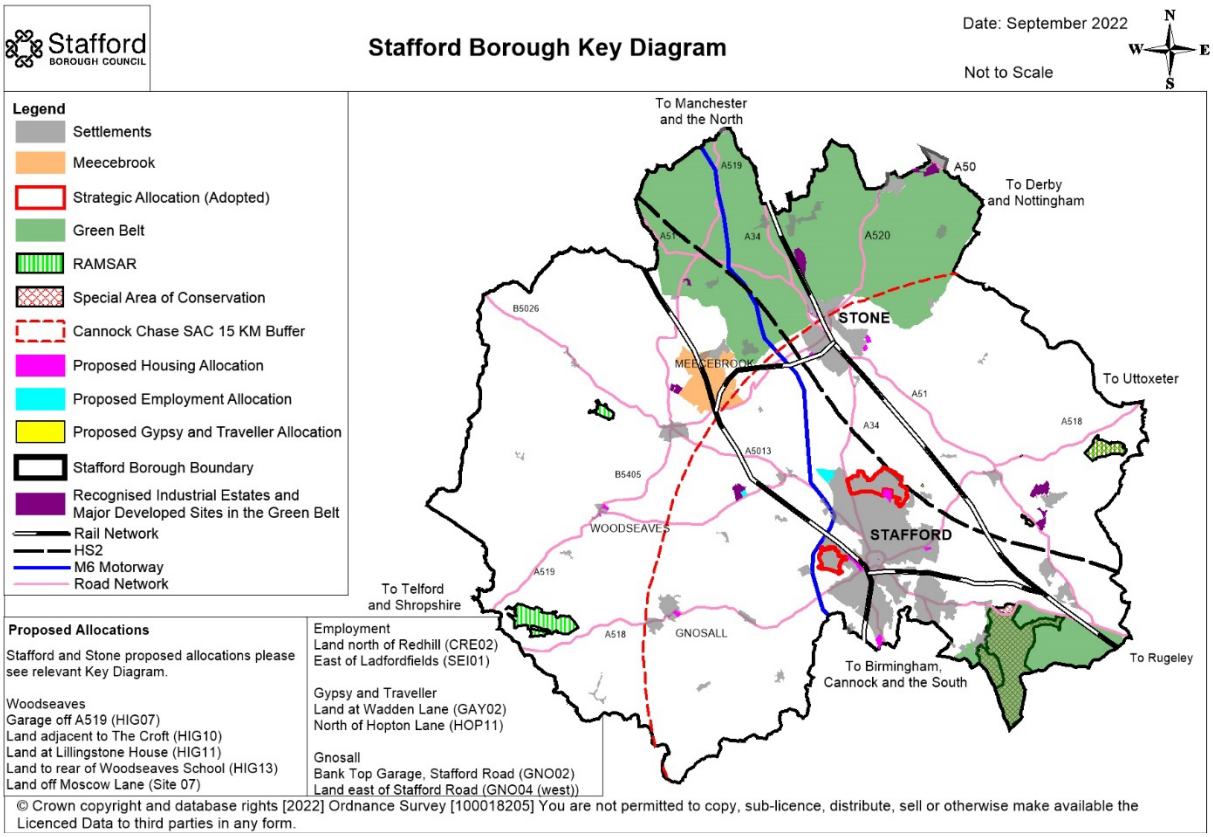
8.1.5 The development strategy is reflected in a key diagram (see Figure 8.1) and fundamentally involves:

- In the period 2020 to 2040 provision will be made for: 10,700 new homes (535 new homes each year); and at least 80 hectares of new employment land.
- The housing requirement will be delivered by: the completion of the north of Stafford and west of Stafford strategic development locations; completion of existing commitments; the development of a new garden community at Meecebrook, which is estimated to deliver 3,000 homes by 2040 as part of a larger planned new community; the development of Stafford Station Gateway; other housing site allocations; the permitting of housing on windfall sites within settlement boundaries as appropriate; and the permitting of housing which accords with the policies of this plan on new housing in rural areas.
- The employment land requirement will be delivered through: redevelopment in Stafford, including Stafford Station Gateway and town centre transformation; completion of the existing employment land commitments; the development of new employment allocations north of Stafford and at Ladfordfields; and the development by 2040 of 15ha of employment land at Meecebrook Garden Community.

Table 8.1: Summary of housing supply of the plan period (2020-2040)

	Completions	Commitments	New supply
Windfall (6%)	N/A	N/A	750
Stafford (59%)	766	5,438	1,181
Stone (7%)	243	268	370
Meecebrook (24%)	N/A	N/A	3,000
Larger settlements (4%)	84	144	234
Smaller settlements (<1%)	7	13	N/A
Rural areas (<1%)	20	62	N/A
Total	**1,120**	**5,925**	**5,535**

Figure 8.1: The key diagram



Appraisal methodology

8.1.6 Appraisal findings are presented across 13 sections below, with each section dealing with a specific sustainability topic. For each of the sustainability topics in turn, the aim is to discuss the merits of the 'preferred options' local plan, as a whole, before reaching an overall conclusion on significant effects. Specifically, the regulatory requirement is to "identify, describe and evaluate" significant effects.

8.1.7 Conclusions on significant effects are reached on the basis of available evidence and understanding of key issues and opportunities, mindful of the guidance presented within the Schedules 1 and 2 of the SEA Regulations. Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the local plan. The ability to predict effects accurately is also limited by knowledge gaps in respect of the baseline (both now and in the future). In light of this, there is a need to make considerable assumptions regarding how the plan will be implemented 'on the ground' and the effect on particular receptors. Assumptions are discussed in the appraisal text where necessary.

8.1.8 The appraisal aims to strike a balance between, on the one hand, a need to be systematic with, on the other hand, a need for conciseness and accessibility. As part of this, it is important to note that, under each of the 13 topic headings, the aim is *not* to systematically discuss each and every site allocation and policy, nor each and every one of the issues/objectives identified at the SA scoping stage.

Table 8.1: Structure of each topic-specific appraisal

Heading	Information provided under each heading
Commentary on the spatial strategy	The aim is to discuss the proposed allocations, both in isolation and in combination, also mindful of site-specific policy, and with a primary focus on non-committed sites. Consideration is also given to decisions *not* to allocate at ten of the larger villages.
Commentary on thematic policies	Discussions are relatively brief, because thematic policies tend to give rise to limited effects / tensions with sustainability objectives, in comparison to the spatial strategy.
Conclusion on the preferred options	The aim is to formally conclude on significant effects. In practice, the aim is to conclude on the effects of the spatial strategy mindful of the extent to which issues / tensions will be addressed, and opportunities realised, through site-specific and district-wide policy.

9 Appraisal of the preferred options

9.1.1 This section presents an appraisal of the current 'preferred options' consultation document as a whole. The appraisal is presented as a series of narratives under the SA framework (see Section 3), with each narrative presented under three sub-headings, as introduced above.

9.2 Air and wider environmental quality

Commentary on the spatial strategy

9.2.1 Stafford Borough is a rare example of a local authority without any designated air quality management areas (**AQMAs**). However, there is still a need to consider any other existing or potential air pollution hotspots, and be mindful of AQMAs in neighbouring areas. In particular, the entirety of Stoke-on-Trent is designated as an AQMA, as is the entirety of Birmingham and the Black Country. There is also a series of AQMAs designated along main roads in the Cannock area.

9.2.2 Firstly, with regards to **broad strategy**, there are transport – and, in turn, air quality – arguments for providing for unmet needs in Stafford Borough, which leads to support for the preferred option (discussed further below). The broad split of housing growth between settlement tiers (Table 8.1, above) is also a key consideration from a transport and air quality perspective. Key considerations are:

- Stafford – will see a high proportion (59%) of growth over the plan period, once completions and commitments are taken into account, which is broadly supported from a transport perspective;
- Meecebrook – will see 24% of growth, which serves to highlight the importance of ensuring that a train station can be delivered;
- Stone and the larger villages – will see a lower proportion of growth. There are strong arguments against dispersing growth, from a transport perspective. However, transport connectivity varies greatly between the villages, plus there is a need to support local centres and services / facilities. The lack of any proposed allocations at Eccleshall is of note, as the village benefits from a strong local offer; however, the village has seen a significant increase in dwelling stock over recent years.

9.2.3 **Meecebrook** is the allocation located closest to an AQMA (specifically, the Stoke-on-Trent AQMA), but is still some way distant, at around 7km. There is a clear need for further work to understand likely traffic flows associated with the site (also the timing of growth, given the anticipated switchover to electric vehicles, EVs), and it is noted that the latest proposed red-line boundary shifts the scheme further away from the M6 corridor, relative to the scheme proposed at the Issues and Options stage, giving rise to a concern regarding Stafford-bound traffic via the centre of Eccleshall.

9.2.4 However, there will be good potential to deliver services, facilities and employment as part of the scheme, thereby supporting trip internalisation; there is the potential to deliver a new train station (to be confirmed); and the car journey to Stafford town centre would be significantly shorter than the car journey to Stoke-on-Trent. Also, Meecebrook may be delivered alongside a new junction on the M6, thereby ensuring that traffic could be directed to the strategic road network and minimising concerns regarding traffic through residential areas, including 'rat-running' traffic through villages and along unsuitable rural roads.

9.2.5 With regards to **site specific policy** for Meecebrook, this serves to provide confidence regarding the local 'offer', in terms of community infrastructure, employment and potentially other technologies to assist with reducing traffic. Also, the emerging concept masterplan serves to highlight the potential for homes and key destinations to be well-linked by walking / cycling / micro-mobility routes, although there are barriers to movement within the site, and constraints that could necessitate something of a 'polycentric' built form. Also, at this stage there is uncertainty regarding the potential for fast and frequent bus connectivity.

9.2.6 **Stafford Station Gateway** also represents a strategic opportunity, with site specific policy requiring:

- *"Provide new and improved bicycle and pedestrian routes within and across the site linking to Stafford town centre in accordance with the Stafford Station Strategic Regeneration Framework.*
- *Provide a new toucan crossing across the Stafford Western Access Road...*
- *Create a new western station entrance and 'station square' public space.*
- *Close Castle Street to through traffic except for buses and improve this as a pedestrian and cycle link...*
- *Improve off-site pedestrian and cycle routes along Newport Road linking to the town centre."*

9.2.7 With regards to **other proposed allocations**, these are smaller sites with limited potential to deliver new community infrastructure and investment in transport infrastructure / services alongside housing growth. Also, a number of the sites are somewhat distant from a town centre, notably:

- The five sites at Woodseaves (125 homes in total);
- The two sites at Gnosall (109 homes in total), and it is noted that Stafford-bound traffic passes through the village of Haughton, although there is a good bus service and cycle route to Stafford;
- Land at Ashflats, Stafford (268 homes), and there appears not to be a cycle lane or path along the A449 into Stafford, although the site benefits from good access to the strategic road network (including to Birmingham and the Black Country, via the M6) and good bus connectivity; and
- The two sites east of Stone (232 homes), with the railway line a significant barrier to movement.

9.2.8 Finally, with regards to the two proposed new **employment land allocations**, there is a need to confirm that allocation would not lead to an oversupply of employment growth locally relative to housing growth, leading to high rates of in-commuting, taking account of a range of factors, including employment densities (e.g. given automation at warehousing and distribution sites) and the need for existing business in the borough to relocate to new, more suitable premises (potentially freeing-up land for housing). Also:

- Land to the north of Redhill (CRE02) - benefits from good access to the strategic road network, such that there are few concerns regarding HGV traffic through residential areas;
- Land to the east of Ladfordfields – is less-well located on the B5405, and there may be a need to confirm the potential to achieve a safe access junction.

9.2.9 A further consideration for local plan-making can often be **noise pollution** and, in this respect, there is a perhaps a need to note the location of both Stafford Station Gateway and Land at Ashflats adjacent to major transport infrastructure. Meecebrook is also adjacent to a major train line (the West Coast Main Line), but there is good potential to address this constraint through masterplanning and design.

Commentary on thematic policies

9.2.10 The primary policy for discussion here is Policy 51 (**Air quality**), which, amongst other things, explains:

- Development shall not lead to a further deterioration of existing areas of poor air quality, cause the exceedance of limit values, or expose residents / users to unacceptable levels of air quality;
- Development should make a positive contribution to air quality improvements where this is possible; and
- Where an issue is identified requirements will be placed on development, for example new and additional on-site electric vehicle charging points and car club spaces; enhancements to bicycle infrastructure; enhanced walking routes, site travel plans; the planting of street trees.

9.2.11 This policy serves to highlight the importance of addressing air quality through spatial strategy and site selection as far as possible, as opposed to leaving the task of avoidance to development management.

9.2.12 A range of **other policies** are also supported, from an air quality perspective, including those under the 'transport' heading and those that seek to protect employment land and community infrastructure. No policies are identified as giving rise to a significant tension with air quality objectives.

Conclusion on the draft plan

9.2.13 The broad strategy is supported, although there is a need to confirm the potential to deliver a train station at Meecebrook, alongside strategic road infrastructure, bus connectivity and a scheme masterplan supportive of minimising the need to travel and modal shift away from the private car. Stafford Station Gateway is also strongly supported, whilst other proposed allocations give rise to limited concerns, although certain are in locations likely to be associated with a degree of car dependency. A further consideration is the balance between housing and employment growth locally, with a view to avoiding unsustainable commuting patterns, which will require further consideration prior to plan finalisation.

9.2.14 In conclusion, a broadly **neutral effect** is predicted at this stage. This reflects the fact that the borough is relatively unconstrained in terms of air quality, plus the national context is one whereby air pollution is set to reduce year-on-year over the next decade, as the car fleet switches from petrol, diesel and hybrid to electric vehicles (EVs), albeit particulate matter pollution will remain an issue (albeit much reduced), e.g. from roads, brakes and tyre wear, mindful of the weight of EVs.

9.3 Biodiversity

Commentary on the spatial strategy

9.3.1 Beginning with the matter of **broad strategy**, the proposal to provide for 2,000 homes unmet needs is tentatively supported, from a biodiversity perspective, given that the effect will be to reduce the pressure to provide for unmet needs in sensitive locations across the sub-region. With regards to unmet needs from Birmingham and the Black Country, for example, there is an argument to suggest that both Lichfield and South Staffordshire districts are less constrained than Stafford Borough, on the basis of the density of internationally and nationally designated habitats and priority habitat; however, unmet needs are of such a scale that there is an argument for all three districts taking their share in order to avoid pressure on sensitive / valued habitats closely associated with urban conurbation and also the Cannock Chase area.

9.3.2 With regards to **Meecebrook**, a key point relates to relatively limited concerns regarding impacts on internationally or nationally designated sites. Cop Mere (part of the Midland Meres and Mosses Phase 2 Ramsar, but not a designated SAC or SPA) is around 3km distant, but not well linked by road. There is a perimeter footpath, but the majority of the area appears not to be accessible.

9.3.3 However, there are wide-ranging considerations in respect of locally designated habitats (Sites of Biological Importance, SBIs) and non-designated 'priority habitats' (a national dataset is available, but is somewhat dated and low accuracy). This largely relates to the fact that development would be focused on the Meece Brook corridor, and the effect of shifting the site red-line boundary to the west and to the south, since the Issues and Options stage, is potentially to modestly increase the concern regarding impacts to the Meece Brook SBI, with the current concept masterplan showing housing (~230 homes) in close proximity. However, on the other hand, there is clear potential to deliver targeted enhancements to the Meece Brook corridor, with a view to realising biodiversity and wider ecosystem service objectives.

9.3.4 Another effect of moving the site boundary to the west is to increase concern regarding impacts to the sensitive Mill Meece area (specifically land west of the village of Millmeece, and west of the railway line). The nationally available dataset (see magic.gov.uk) does not show priority habitat, but there is an SBI that follows the route of Sytch Lane (associated with 'hedgerows and marl pits') and there is an archaeological priority area associated with 'water meadows'. The current proposal is for development not to extend as far north as this area (despite it falling within the land ownership boundary), hence there could be an opportunity for targeted enhancements; however, equally, there could be a risk of development creep.

9.3.5 On the other hand, the effect of shifting the red line boundary is to greatly reduce concerns regarding impacts to the extensive priority habitat (primarily woodland) and SBIs associated with Swynnerton Training Area (MOD land). There is also a small SBI potentially at the southern edge of Yarnfield, but this land is located within the Green Belt (which extends south beyond the southern boundary of Yarnfield).

9.3.6 Finally, with regards to non-designated habitats: as well as the main stream corridor, there is an area of man-made lakes and also a military shooting range, which is associated with woodland priority habitat, although much will be recent secondary habitat (the pre-1914 OS map does not show the lakes, but does show a notable 'covert' at the eastern extent of what is now the shooting range); there is a fairly high density of historic field boundaries across much of the site, although several shown on the pre-1914 OS map are no longer present; and the eastern extent of the site, to the east of the Meece Brook, where ~375 homes are proposed (at a lower density of 25 dph), is associated with a notable series of small, irregular shaped fields which notably include field trees and / or small copses seemingly associated with previous areas of minerals extraction, or past field ponds (these are shown on the pre-1914 OS map). Similarly, fields at the south-eastern extent of the site are associated with a notable series of small woodland copses.

9.3.7 Moving on to **Stafford Station Gateway**, the site is closely associated with the river corridor and adjacent to Doxey and Tillington Marshes. However, as a regeneration site there is a clear argument in support of growth, and it is noted that the SSSI is managed as a nature reserve; however, Natural England and the Wildlife Trusts will wish to comment in detail. The proposed site specific policy could be more detailed.

9.3.8 With regards to **other proposed allocations**, the package of allocations at **Stone** is of note (including given the potential for in-combination effects, e.g. along a section of the River Trent valley). In particular: Land at Trent Road (STO08 / STO10; 20 homes) is subject to biodiversity constraints, given the adjacent river corridor and onsite mature trees; Land to east of Oakleigh Court (STO13;131 homes) comprises two fields separated by a historic lane and stream / hedgerow; and Land at Uttoxeter Road (STO16; 97 homes) is similarly comprises two fields separated by a historic hedgerow (less significant than STO13).

9.3.9 Finally, with regards to Land to the north of Redhill (**CRE02**), there are a number of considerations:

- There is a notable band of priority habitat woodland (not ancient woodland) to the south of the site, which does include a small SBI; however, the business park has already expanded beyond these woodlands.
- Finally, it is noted that there are ponds within the site, understood to be associated with populations of great crested newts, with three nearby ponds having recently been impacted by development.
- There are several historic field boundaries within the site, but with a notably regular pattern.

Commentary on thematic policies

9.3.10 A primary point to note is the focus of the plan allocating two **Countryside Enhancement Areas**, namely along the river valleys at Stafford and Stone, with a key commitment to prepare a masterplan to "guide interventions". Strategic targeting of biodiversity interventions is supported, including with a view to ensuring that the legal / policy requirement to deliver Biodiversity Net Gain (BNG) alongside development leads to net gains at functional landscape scales rather than just at the scale of development sites. Also, strategic targeting supports realising ecosystem service' benefits, e.g. in respect of flood water attenuation and recreation. However, there is also a need to avoid overly focusing mitigation and enhancement areas to the extent that there becomes a polarisation between A) landscapes associated with development / growth and biodiversity decline; and B) landscapes associated with interventions and enhancements.

9.3.11 More widely, a number of the proposed development management policies are supported, notably:

- Policy 46 (**Green and blue infrastructure network**) – notably sets requirements of development proposals "within or adjacent to" the identified Strategic Green Infrastructure Network, and also requires that: *"Residential developments of 10 or more dwellings will be required to contribute… by providing onsite publicly accessible open space and/or contributions to offsite open space provision, together with contributions to ongoing maintenance, to meet a standard of 32m2… per person, comprised of…"*
- Policy 47 (**Biodiversity**) – a key point to note is the proposal to support the minimum legal requirement of development sites achieving 10% BNG, as opposed to a higher figure, e.g. 20% as per the approach being taken / explored through other local plans nationally. This might ideally be revisited prior to plan finalisation, subject to viability considerations (the current viability study does not explore 20%). Kent is leading the way nationally at the current time, in terms of evidencing the potential to viably achieve 20% biodiversity net gain, see: https://kentnature.org.uk/nature-recovery/biodiversity-net-gain/.
- Policy 48 (**Cannock Chase SAC**) – is associated with particular sensitivities and challenges, and so warrants a stand-alone policy (in contrast to the other internationally important sites within the borough).
- Policy 49 (**Trees**) – requires that: *"Where the benefits of the proposed development outweigh the harm resulting from the loss of trees and hedgerows, adequate replacement provision will be required, including an ongoing management plan."* This is an important requirement, as a number of the proposed allocations do include trees or hedgerows likely to be of some biodiversity (also wider) value.

9.3.12 No development management policies are identified as giving rise to any significant tension with biodiversity objectives. It is noted that Policy 22 (Canals) does not make reference to biodiversity issues / objectives, but this is likely appropriate, given other policies in the plan and the need for policy conciseness. Policy 43 (Sustainable drainage) is an example of a policy that does make brief reference.

Conclusion on the draft plan

9.3.13 The broad strategy is supported, particularly as the effect of planning for higher growth locally will be to reduce pressure for growth elsewhere in the sub-region, which could well mean reduced pressure for growth in areas that are sensitivity in biodiversity terms. The proposed allocations give rise to certain tensions, but primarily in respect of locally and non-designated habitats, as opposed to nationally or internationally designated. The proposal to take a strategic approach to biodiversity enhancement and securing ecosystem service benefits at Stafford and Stone is supported (subject to consultation with Natural England, Staffordshire Wildlife Trust and other relevant organisations), and it will be important that a similarly strategic approach is taken at Meecebrook, with a view to securing an ambitious level of BNG at an appropriate landscape scale. The possibility of going beyond the 10% minimum could certainly be explored at Meecebrook, and it might also be considered for other sites, subject to viability considerations.

9.3.14 In conclusion, a broadly **neutral effect** is predicted at this stage. There is an argument for predicting the likelihood of positive effects on the baseline; however, there is much uncertainty at this stage, ahead of further detailed work, including in respect of masterplanning and development viability.

9.4 Climate change adaptation

Commentary on the spatial strategy

9.4.1 The key consideration here is the need to avoid development - in particular new homes - encroaching on fluvial **flood risk zones**, noting the possibility of expanded flood risk zones under climate change scenarios. A secondary consideration is the need to avoid surface water flood risk zones, noting that it is often possible to deal effectively with surface water flood risk through masterplanning and design measures, including sustainable drainage systems (SuDS). Another consideration is development impacting (either positively or negatively) on water flows and, in turn, down-hill / down-stream flood risk; however, it is difficult to pinpoint issues / opportunities without undertaking detailed work.

9.4.2 Beginning with **Meecebrook**, as well as the Meece Brook corridor itself, there is a need to note that land to the west, in the vicinity of Baden Hall, is a low lying landscape associated with surface water flood risk, although surface water flood channels are associated with a series of lakes (used for fishing), which potentially reduces any concerns. It could feasibly be the case that a desire to maximise densities in proximity to a new rail station (to ensure viability) could conflict with a desire to direct growth away from areas of flood risk. However, at this stage there are no major concerns.

9.4.3 With regards to flood water attenuation opportunity, Staffordshire Wildlife Trust has stated: *"The Meece brook is an ideal location to focus implementation of natural flood management not only to help alleviate flooding issues within the catchment but will also provide additional habitats."* However, on the other hand, the high density of road and rail infrastructure associated with the Meece Brook at the southern extent of the site (where there is an SBI, and the river follows a natural meandering course) would likely hinder natural flood management interventions, plus areas at risk of flooding downstream within Stafford town centre (also Stafford Station Gateway) are a long way distant, to the south.

9.4.4 The next matter for consideration is **Stafford Station Gateway**, which falls largely within fluvial flood risk zone 2, and partly in zone 3. There is also a need to consider down-stream flood risk within Stafford. Site specific policy states: *"The design of the development shall be informed by a site-allocation-wide flood risk assessment and sustainable drainage strategy that demonstrates how flood risk will be managed..."* However, there is a need to consider whether there will be any residual risk, and balance any such risk with the benefits of the scheme, which are significant, as discussed under other topic headings. The current draft masterplan for the scheme proposes extensive blue infrastructure within the site.

Figure 9.1: Vision for Stafford Station Gateway, from the Draft Strategic Regeneration Framework (2022)



9.4.5 With regards to **other proposed allocations**:

- Land at Ashflats, Stafford – the site boundary has been reduced to omit an area of fluvial flood risk. The most recent submitted concept masterplan includes the land within the flood risk zone, and seems to indicate housing directly abutting the flood risk zone, such that the possibility of a buffer to reflect climate change scenarios might warrant consideration. Also, much of the site is affected by surface water flood risk, albeit predominantly the 1 in 1000 year and 1 in 100 year zones, as opposed to the 1 in 30 year.
- Land at Trent Road, Stone – intersects flood risk zone 2. It is also notable that flood zone 3 is adjacent, such that there will be a need to consider the effect of climate change scenarios, e.g. all or part of the current zone 2 could potentially become zone 3. The proposed gross density is ~25 dph.
- The two proposed allocations to the east of Stone both notably intersect a surface water flood risk zone, which will be a factor to take into account when considering site capacity, layout and access.

9.4.6 With regards to wider (i.e. **non-flood risk**) considerations, it is fair to highlight the scale of Meecebrook could lead to an opportunity to ensure high quality masterplanning and design with adaptation / resilience in mind, e.g. ensuring extensive green infrastructure within the site (providing shade and supportive of urban cooling) and ensuring that homes are laid out and orientated so as to minimise over-heating risk.

Commentary on thematic policies

9.4.7 Policy 42 (**Flood risk**) primarily gives effect to national policy, and serves to highlight the inherent challenge of plan-making ahead of detailed flood risk studies. It is important to note that Planning Practice Guidance (PPG) on flood risk has been updated recently (August 2022). For example, in respect of downstream impacts, the PPG now states: *"Whilst the use of stilts and voids below buildings may be an appropriate approach to mitigating flood risk to the buildings themselves, such techniques should not normally be relied upon for compensating for any loss of floodplain storage. This is because voids do not allow water to freely flow through them, trash screens get blocked, voids get silted up, they have limited capacity, and it is difficult to stop them being used for storing belongings or other materials."*

9.4.8 Policy 43 (**Sustainable drainage**) is also clearly supported, given the need to draw on national experience of the issues that can arise due to poor design, management etc. For example, the policy requires: *"Where partial or completely pumped drainage systems are provided, the design flood level should be determined if the pumps were to fail, if the attenuation storage was full, and if a design storm occurred."*

9.4.9 Finally with regards to the two proposed **Countryside Enhancement Areas**, this approach will assist with securing ecosystem service benefits, as discussed. However it is noted that the proposed Area at Stafford is downstream of the town centre, such that flood risk attenuation benefits could be relatively limited.

Conclusion on the draft plan

9.4.10 The proposed strategy does, to some extent involve targeting growth towards river / stream corridors; however, this is in no way unusual, particularly given that such areas will tend to be an appropriate location for growth from a transport / accessibility perspective. However, there is a need to caution against directing growth to locations that have historically not been considered suitable for development, or considered suitable only for non-residential development, due to flood risk concern. Flood risk concerns are more significant than in the past due to uncertainties around climate change scenarios and, whilst there is good potential to avoid and mitigate flood risk through detailed measures at the development management stage (through building design, etc), there is a need to recognise the potential for residual risk to remain and, in turn, seek to avoid risk in the first instance as far as possible. It will be for the Environment Agency to comment further on the proposed strategy and sites through the consultation.

9.4.11 In conclusion, a '**moderate or uncertain' negative effect** is predicted at this stage, particularly given the need for further detailed work at Stafford Station Gateway, but also noting certain other sites associated with a degree of flood risk.

9.5 Climate change mitigation

Commentary on the spatial strategy

9.5.1 As discussed in Section 5.2 of this report, strategic growth locations can give rise to an opportunity to minimise **per capita** greenhouse gas emission from the **built environment**.

9.5.2 In turn, the scale of **Meecebrook** serves to suggest a significant opportunity, although it is recognised that there will be competing funding priorities, e.g. around transport infrastructure. Also, there remains certain unresolved issues around land availability and cooperation between land-owners, which could feasibly lead to challenges, in respect of a fully coordinated scheme with decarbonisation opportunities realised. A 'charter' has been drafted to guide ongoing decision-making, masterplanning etc, which does include a significant focus on taking an ambitious approach to decarbonisation, e.g. stating: *"It will aim crucially to establish comprehensive site-wide green energy infrastructure."* However, certain of the commitments require further scrutiny (e.g. *"As the settlement grows renewable energy technologies on-site and in the local area, will generate enough renewable energy to balance the operational and embodied carbon consequent of the new community"*),[23] and all will require ongoing scrutiny once detailed understanding of competing costs, notably in respect of transport infrastructure, and available funding is clarified.

9.5.3 With regards to inherent locational opportunities, it is noted that the site is closely linked to a water body that could feasibly provide a source of ambient heat to feed into a heat network, but there is little reason to suggest a likelihood that such a scheme would prove feasible and viable in practice. Hydropower opportunities could also feasibly be explored, but this is highly unlikely to be a feasible / viable option. Finally, it is noted that the site is well suited to delivering significant employment land, which could potentially help with balancing heat supply and demand as part of a heat network (linked to residential areas); however, once again, this is only a theoretical opportunity to be considered further.

9.5.4 Briefly, with regards to transport emissions, matters have been discussed above, under 'air quality and are a focus of discussion below, under 'transport', but a headline conclusion is good potential to support trip internalisation / shorter trips and modal shift towards walking, cycling, public transport, electric vehicles and other low carbon modes of travel. Matters remain subject to further work and confirmation.

9.5.5 With regards to **Stafford Station Gateway**, this is also a strategic site, albeit much smaller ~900 homes. Higher density development and a mix of uses within and nearby to the site can give rise to a built environment decarbonisation opportunity, in particular in respect of heat network delivery. However, as a complex regeneration site it is anticipated that there will be a wide range of competing funding priorities.

9.5.6 With regards to **other proposed allocations**, as smaller sites there would be relatively limited potential to take an ambitious approach to minimising built environment emissions, e.g. seeking to go beyond the requirements of Building Regulations in respect of operational emissions, or supporting modern methods of construction in order to minimise non-operational emissions (e.g. embodied emissions).

9.5.7 Finally, with regards to the question of allocating a large new employment site as a 31.2 ha extension to Redhill Business Park (**CRE02**), there is a need to consider implications for the balance of housing and employment growth locally, with a view to avoiding 'unsustainable' commuting patterns, as discussed.

Commentary on thematic policies

9.5.8 Policy 4 (**Climate change development requirements**) is a centrally important policy, and the proposal to elevate this policy, by placing it 'front and centre' within the plan is strongly supported.

This is a fast moving policy agenda nationally, following fairly recent clarity from the Government that there *is* the potential to set requirements for regulated operational built environment emissions that exceed the requirements of the Building Regulations (which are in the process of being tightened to a Future Homes Standard). In turn, there is a need to avoid a confusing policy environment that leads to undue challenges for planning applicants and/or challenges for those wishing to scrutinise policies in light of net zero targets.

However, the proposed approach is commendably clear, including with a focus on the energy hierarchy, namely: 1) avoid heat and power use including through efficiency measures; 2) meet heat and power needs through onsite renewable generation as far as possible; and 3) offset of any residual emissions.

[23] With regards to 'renewable energy technologies on-site and in the local area', there is a need to consider whether such schemes (particularly solar farms, less so hydropower) would feed into the national grid, rather than serving the needs of the new community specifically, and would have come forward in any case, regardless of the new community.

The specifics of the proposed approach are thought to broadly align with the approach advocated by the UK Green Building Council (UKGBC, 2021), who strongly advocate for a new focus on '**energy intensity**' (kWh/M^2/year), stating: *"The 2025 Part L update must fundamentally change the way energy performance is assessed within the Building Regulations, with a decisive pivot from theoretical comparisons to real-world outcomes (Energy Intensity, i.e., kWh/m2/year) which can be linked to the Net Zero trajectory."*

Nonetheless, there is a need for further scrutiny, plus further work to consider development viability implications, given competing costs on developers, for example infrastructure, affordable housing and Biodiversity Net Gain. The Viability Study (2022) considers this matter in detail; also see **Appendix III**.

There are three further points to make at the current time:

- Established and well-respected certification schemes – such as Passivhaus are supported. However, there is a need to explain the pros and cons of developers using these standards, as opposed to simply demonstrating compliance with the headline requirements of the policy.
- Offsetting – will often prove to be cheaper than taking steps to achieve ambitious emissions reductions onsite. However, there is a need to avoid an undue reliance on offsetting as far as possible, because of an inherent risk of offsetting not always proving entirely effective in practice (e.g. due to the issue of additionality, specifically the challenge of demonstrating the carbon reduction measure would not have happened in any case, regardless of the development / funding from the development). This serves to highlight the importance of carefully setting the carbon price (i.e. the cost that must be paid by the developer per tonne of carbon offset) and developing a robust local (or sub-regional) offsetting regime.
- Non-operational (e.g. embodied) emissions – this is a focus of Policy 4, which is supported, as this is increasingly recognised as a key issue for local plans, for example as discussed by UK Green Building Council (UKGBC, 2021), with specific key issues / opportunities relating to: building reuse ahead of demolition and rebuild; and supporting 'modern methods of construction' including modular housing.

  Consideration should be given to whether Meecebrook represents an opportunity to support modern methods of construction, noting the following quote from the UKGBC report: "*"Many leading developers and infrastructure clients now measure and optimise the embodied carbon footprint of new projects… but it is far from being mainstream practice..."* Inspiration might be taken from this Sustainability Guidance for Harlow and Gilston Garden Town (10,000 homes), albeit this dates from 2020.

9.5.9 A wide range of other policies are clearly of some relevance to decarbonisation objectives, but a final key policy for discussion here is Policy 40 (**Renewable and low carbon energy**), which explains:

"The policies map identifies areas in which proposal for one or more wind turbines and proposals for solar photovoltaic generation will be supported in principle provided they are in accordance with the following paragraphs of this policy and other policies of this plan..."

9.5.10 This is supported as a best proactive approach to supporting large scale power generation schemes (i.e. schemes feeding into the national grid, as opposed to schemes directly powering homes and businesses) through local plans. There can also be strategic opportunities around hydropower, but of primary importance is strategic planning for wind and solar.

Conclusion on the draft plan

9.5.11 The broad strategy is supported, namely the high proportion of new allocations directed to a large-scale strategic growth location, namely Meecebrook, which is considered to represent a clear opportunity. However, there is a need for further work to demonstrate why the site is an appropriate location to focus strategic growth, from a decarbonisation perspective (e.g. location specific heat network opportunities), and explain how decarbonisation objectives fit with the scheme vision, masterplanning principles etc. There is also a need for further work on viability to understand tensions between decarbonisation objectives and wider objectives, e.g. transport and infrastructure.

9.5.12 The proposed strategic policy on 'Climate change development requirements' is strongly supported, as it is considered to align with best practice nationally. However, there will be a need for further work to consider adjustments prior to plan finalisation, because this is a fast paced policy area, and there will be a need for further work to explore implications of the policy for whole plan viability and housing delivery.

9.5.13 In conclusion, a **'moderate or uncertain' positive effect** on the baseline is tentatively predicted at this stage. Climate change mitigation is a global consideration, such that local actions can only ever have a limited effect; however, the ambition of the proposed strategy and policy approach is considered to align with the ambition reflected in the Borough's target of achieving net zero by 2040.

9.6 Communities

Commentary on the spatial strategy

9.6.1 A headline consideration is the need to ensure that new and existing communities have good access to community infrastructure with capacity. As part of this, there is a need to avoid creating or exacerbating capacity issues and seek to deliver new or upgraded **community infrastructure**, including in response to existing issues / opportunities. This point comes through quite clearly within the consultation responses received in 2020, and is a key factor that has influenced spatial strategy (particularly in terms of the balance distribution of housing growth between settlements) and site selection (in particular in and around Stafford, where there is more than one secondary school catchment).

9.6.2 Secondary school capacity is understood to be a particularly key issue locally, albeit measuring and planning for secondary school capacity is far from an exact science. The immediate point to note is that **Meecebrook** would deliver a secondary school to serve the new community, and there would also be the potential for the new school to assist with addressing existing capacity constraints in Stone and Eccleshall, although Stone has a three tier education system whilst Eccleshall and Meecebrook would be two tier. Nevertheless this is a very significant consideration.

9.6.3 Health facilities are a further consideration. There is a need for the local NHS Clinical Commissioning Group (CCG) to comment in detail, but Meecebrook would certainly be of a scale to warrant delivery of a new facility, albeit there are existing facilities at Eccleshall and Stone.

9.6.4 With regards to **Stafford Station Gateway**, this is strongly supported, from a perspective of supporting a 20 minute neighbourhood. There are a wide range of site-specific opportunities to be realised, as reflected in the following points from the site-specific policy (over-and-above those listed above, under 'air quality'):

- *"Create a landscape-led development that delivers a network of green and blue spaces throughout the site, including the naturalisation and creation of public access to Doxey Brook…*
- *Provide a mix of apartments and houses together with offices and workspaces.*
- *Provide food and beverage and convenience retail uses not exceeding 1,400sqm of floorspace in total across the site allocation to serve the future residents and users of the development…*
- *Deliver high-quality design in line with the aspirations of the Strategic Regeneration Framework."*

9.6.5 However, there are currently understood to be challenges in respect of school capacity. It is anticipated these can be resolved, but it does serve to indicate an element of delivery risk (in addition to flood risk).

9.6.6 With regards to **other proposed allocations**, as smaller sites there would be limited potential to deliver or facilitate significant new community infrastructure, which could lead to increased pressure on local community infrastructure. Gnosall benefits from an existing GP surgery (it is not known if there are any capacity issues), whilst there is no GP surgery at Woodseaves. Also, at Woodseaves, there is a need to confirm the precise capacity of the village primary school to accommodate growth without expansion.

9.6.7 It is also important to note here that a primary driver of the decision not to direct any new allocations to **Eccleshall** was the lack of available capacity at Sir Graham Balfour high school in Stafford; also, Eccleshall has seen significant growth in dwelling stock over recent years. Similarly, the proposed approach of not directing any new allocations to **Great Haywood** is of note. The village does benefit from a GP surgery, but there is a need to consider the extent of recent completions in commitments: one extension to the south of the village has been delivered and another to the southeast is under construction, with a total of 281 homes delivered over the period 2011-22, amounting to a 30.3% increase in dwellings.

9.6.8 Another point to briefly note is the proposal not to assume any supply from two proposed allocations at Stafford (HOP03 and HOP08), due to there being no clear way to address school capacity issues.

9.6.9 There are wide ranging **other considerations**, which are discussed under other topic headings. One key consideration relates to the proposed masterplan for Meecebrook, which might be described as somewhat polycentric. This is supported from a perspective of ensuring that extensive green and blue infrastructure is a defining feature, but could also lead to challenges in respect of ensuring easy access to key destinations by active modes of transport.

9.6.10 Finally, there is a need to note the discussion a possible **Community Infrastructure Levy (CIL)** within the Viability Study (2022), with the recommendation that *"for the Local Plan to come forward at the [recommended] levels of affordable housing, a CIL charge should not be implemented."*

Commentary on thematic policies

9.6.11 A wide range of policies lead to implications for 'communities' objectives. These are overwhelmingly positive, with it being difficult to conclude that any lead to significant tensions, recognising that policies will be implemented 'in the round', with judgements made regarding how to balance competing objectives.

9.6.12 Key policies are those presented under the 'design and infrastructure' heading, including:

- Policy 34 (**Urban design general principles**) – notably includes requirements around: avoiding *"cul-de-sacs typologies… where there are opportunities to extend existing movement networks…";* and supporting *"accordance with Manual for Streets to make walking (including wheelchair…) and cycling the easiest way to make short, local journeys and to ensure vehicular parking does not dominate…."*
- Policy 37 (**Infrastructure to support new development**) – requires: *"New development that generates a demand for infrastructure will only be permitted if the necessary on and off-site infrastructure required to support and mitigate the impact of that development is either: 1. Already in place; or, 2. There is a reliable mechanism to ensure that it will be delivered…"*
- Policy 39 (**Protecting community facilities**) – clearly states that: *"Proposals that involve the loss of an existing community facility or the loss of a site allocated for such purpose will only be supported where: 1. There is no longer a local need for the facility and this has been robustly evidenced by research and consultation; or 2. An equivalent facility in terms of quality is provided..."*

Conclusion on the draft plan

9.6.13 The broad strategy and approach to site selection is supported, for example given a clear focus on directing growth mindful of schools school capacity, and Meecebrook represents a significant opportunity, in terms of the potential to deliver infrastructure and 'planning gain'. Also, the DM policies is supported, although it is noted that the Viability Study (2022) concludes that establishing a CIL is not viable.

9.6.14 In conclusion, **significant positive effects** are predicted. However, there is a degree of uncertainty at the current time, ahead of further discussions with the County Council (e.g. in respect of schools capacity to support development of Stafford Station Gateway) and other infrastructure focused organisations.

9.7 Economy and employment

Commentary on the spatial strategy

9.7.1 The proposed employment land **requirement** for the plan period is 80 ha, whilst the proposed employment land **supply** is as follows:

- 2020-2022 net completions: -5.5 ha
- Existing commitments: 108.5 ha
- Meecebrook Garden Community: 15 ha
- Stafford Station Gateway: 1.56 ha
- Other employment allocations (x 2): 36.8 ha
- Total: 156 ha

9.7.2 The difference between the two figures serves to highlight that there will be a need for further work, subsequent to the consultation, to confirm whether A) the requirement should be increased (in response to market signals, to be explored through an EHDNA update); and/or B) the supply buffer (currently 156 – 80 = 76 ha) should be decreased, due to increased certainty regarding the deliverability of sites within the supply (also regarding loss of existing employment land). With regards to (A), one matter for consideration will be around job density trends at warehousing and distribution sites, given increasing automation, and another trend to consider is in respect of existing businesses wishing to move from constrained or dated premises to new modern premises in the borough (potentially freeing-up land for housing).

9.7.3 Importantly, aligned with this proposed approach to employment growth, the proposal is to set the **housing requirement** at a figure above LHN (391 dpa). The borough's own housing needs are identified as 435 dpa, in order to balance housing and employment growth locally, and so avoid unsustainable commuting patterns. However, the picture is complicated by the fact that a further 100 dpa is proposed to be accommodated, taking the total housing requirement up to 535 dpa, to reflect unmet housing needs from elsewhere, as opposed to locally arising housing needs alone.

9.7.4 With regards to **Meecebrook**, there is general support for mixed use new communities, and there are reasons to suggest this is a strong location for employment growth, assuming significant transport infrastructure upgrades, including a train station and good links to the M6. The potential for the new employment area to develop a profile as a valued hub, located between Stafford and Stoke-on-Trent, can be envisaged, although there is a need to note the proximity of the industrial and business park at the southern edge of Stone, which is considerably larger (~80 ha including the recently completed land).

9.7.5 Finally, with regards to the two proposed **employment allocations**: Land north of Redhill (CRE02; 31.2 ha) appears highly suitable as a location for employment growth, as it would expand and potentially complete the Redhill Business Park, which is well located on the strategic road network, plus the strategy of growing a large business park adjacent to a large residential growth area, to the east of the A34, is supported; Land to the east of Ladfordfields (5.6 ha) would extend a successful industrial estate, but is located on a B-road, and there is also a need to confirm access arrangements to an expanded site.

Commentary on thematic policies

9.7.6 The **suite of policies** under the 'economy' heading will act together to protect existing employment land and ensure opportunities to enhance and expand the local offer. A two tier approach is taken, and the proposed approach is considered to amount to a strong degree of protection. As explained within supporting text: *"It is important to maintain a diverse range of workplaces of all sizes and types to allow for new start-ups, the expansion of existing businesses and inward investment to the borough."* However, there must always be an element of flexibility, in respect of change of use, where employment land is being underutilised. For example, directing new housing to underused employment land can avoid greenfield loss, which is increasingly seen as a priority nationally.

9.7.7 Also, by way of context, it is important to note the following: *"It is recognised that changes in 2020 and 2021 to [planning use class orders] reduce the ability of the council to control changes of the use of business premises which fall within Class E. However, the bulk of employment land within the borough continues to be within Class B2 and B8."*

9.7.8 Another key policy to note is Policy 19 (**Town centres and main town centre uses**), which, amongst other things, seeks to respond to the Town Centre Capacity Assessment (TCCA, 2019). There is a clear framework proposed for Stafford, Stone and Eccleshall centres, although there is also a need to consider the changing role of high streets and town centres, including post-Covid.

Conclusion on the draft plan

9.7.9 A proactive approach to employment land growth is proposed, in response to available evidence in the form of the EHDNA (2020), recent experiences of a buoyant market / strong uptake of employment land high-level understanding regarding the risk of unmet needs from elsewhere. This approach is clearly supported, from an 'economy and employment' perspective. However, there will be a need to review the strategy prior to the consultation, taking into account latest evidence, including with a view to ensuring a balance between housing and employment growth locally.

9.7.10 In conclusion, **significant positive effects** are predicted. However, there is a degree of uncertainty at the current time, ahead of receiving views through consultation (e.g. from the Stoke and Staffordshire Local Enterprise Partnership, and neighbouring authorities within the Functional Economic Market Area). Also, it is anticipated that the Economic and Housing Development Need Assessment (EHDNA, 2020) will be revisited prior to plan finalisation, taking account of the latest national economic context.

9.8 Health and wellbeing

Commentary on the spatial strategy

9.8.1 Primary considerations here relate to masterplanning, design and 'place making', as well as ensuring good access to green and blue infrastructure, mindful that other 'communities' considerations are a focus of discussion above, including the matter of access to health facilities.

9.8.2 There is a focus nationally on achieving high standards of masterplanning, design and place-making, as well as delivering high quality community and green / blue infrastructure, in support of objectives around: health and wellbeing, 'levelling-up' and resilience. The new NPPF (2021) is notable for a major new focus on use of design codes and, whilst there is little in the way of an explicit focus on health objectives, it is fair to anticipate that health objectives will be central to work on design codes in practice.

9.8.3 Also, a recent report (April 2022; www.resiliencebrokers.org/project/key-cities) called health-focused approach to planning nationally, specifically: *"One that moves away from having the delivery of housing numbers at its core, and replaces this with a holistic vision of health. Affordable, quality housing is still a critical issue of course, but it is one in an array of conditions necessary to support good health."*

9.8.4 There are well established opportunities associated with new garden communities, including around delivering new health infrastructure, supporting walking / cycling, and ensuring good access to gardens, sports facilities, greenspace and countryside. In this light, **Meecebrook** represents a clear opportunity, as there is a firm commitment to deliver a major new settlement in accordance with garden community principles. The landscape framework within which the site is located could be supportive of these aspirations, notably the close association with the Meece Brook and a series of flooded gravel pits (some now used as fishing lakes). Given the scale of development, ambitious green and blue infrastructure enhancement options should be considered, including making accessible a large stretch of the Meece Brook Valley (also the flooded gravel pits at Baden Hall) that currently has limited public access, alongside enhancement measures aimed at realising biodiversity and other wide range ecosystem service benefits.

9.8.5 However, there are also potential challenges, from a health and wellbeing perspective, including: the railway line; the potential for impacts to the Stone Circles Challenge long distance footpath, which links Stafford to Stoke (albeit the revised site boundary reduces concerns); the potential for some parcels on the extremity of the new settlement to be less well linked to the centre / community infrastructure; and the high pressure gas pipeline that passes through the site (it is understood that this has fed into masterplanning completed to date, but there is a need for further clarification). A final consideration, in respect of Meecebrook, is that it would be delivered as a more-or-less stand-alone new settlement, such that impacts to existing communities might be lower than would be the case for an urban extension.

9.8.6 With regards to other allocations, considerations include:

- there are certain arguments in favour of directing growth to **Gnosall**, particularly as there is a GP surgery at the village and there is connectivity to Stafford by The Way for the Millennium cycle path;
- the two sites to the east of **Stone** are located in proximity to a level crossing, such that there is a need for further discussions with Network Rail regarding suitability; and
- there is a need to confirm the potential for safe road access arrangements at the proposed new employment land allocation to the east of **Ladfordfields**.

9.8.7 Overall, there are wide ranging positives effects and potential tensions, mindful of the wide range of health determinants, but significance is potentially somewhat limited.

Commentary on thematic policies

9.8.8 As per the discussion above under 'communities', wide ranging policies lead to broadly positive implications for health objectives, and it is difficult to identify policies that lead to significant tensions.

9.8.9 One key policy is Policy 34 (**Urban design general principles**) includes a notable focus on designing-out crime, with the requirement for *"adequate natural surveillance, clear definition of private and public space, well-lit spaces, and by fronting public spaces with active frontages."*

9.8.10 Policy 4 (**Climate change development requirements**) is also relevant. It is recommended that the policy should be reviewed to ensure a clear framework for climate change adaptation, e.g. masterplanning and design supportive of shading and green and blue infrastructure that serves to minimise the urban heating. Similarly, adaptation considerations might be reflected in Policy 36 (**Landscaping design**).

Conclusion on the draft plan

9.8.11 The discussion presented above serve to indicate opportunities more so than risks. Meecebrook is associated with a clear opportunity on account of its scale, in respect of green and blue infrastructure and wider health considerations; however, there is a need for further work, for example in respect of avoiding / buffering the high pressure gas pipeline that runs through the site, and ensuring that a polycentric built form is not a barrier to ensuring a well-integrated and well-connected community.

9.8.12 In conclusion, a broadly **neutral effect** is predicted at this stage, mindful of the wide range determinants of health, and because it is not clear that growth-related enhancements would be 'strategic' to the extent that there are significant benefits to existing communities as well as new communities.

9.9 Historic environment

Commentary on the spatial strategy

9.9.1 As an initial point, it is important to note that a **Historic Environment Site Assessment Stage 1 Report** was an important input to the site selection process. The study identified 18 sites with high sensitivity, none of which have been taken forward for allocation (at Gnosall, GNO04 was split in two through the study, with the proposed allocation, namely GNO04(west), less sensitive than GNO04(east)).[24]

9.9.2 With regards to **Meecebrook**, a detailed appraisal is presented in Appendix IV, and is not repeated here for brevity. In short, whilst there are a range of issues and constraints, it is not clear that the site can be considered particularly constrained, in the context of sites of this scale nationally. With regards to site-specific policy, there is currently no specific reference to historic environment constraints, which might be revisited ahead of plan finalisation, but there is a requirement to prepare a Framework Masterplan SPD.

9.9.3 With regards to other proposed allocations, a primary consideration is potentially Land east of Stafford Road, **Gnosall** (100 homes), which is located in close proximity to the small village centre conservation area, which includes the grade 1 listed parish church (albeit there are only three further grade 2 listed buildings within the conservation area). However, the site would not be directly adjacent to the conservation area, and whilst visible from the A518 on the approach to the conservation area, would be seen in the context of other modern development on the opposite side of the road, plus there is a modern development (within the past ten years) to the west of the site, which is adjacent to the conservation area. The site is also quite well contained in landscape terms, serving to reduce concerns further 'creep'.

9.9.4 With regards to the question of allocating a large new employment site as a 31.2 ha extension to Redhill Business Park (**CRE02**), there are no apparent concerns regarding impacts to a designated asset. However, the Historic Environment Record (HER) indicates two fields associated with ridge and furrow.

9.9.5 Finally, it is appropriate to briefly note that the proposed strategy is not to allocate any new sites for development at certain settlements that can be considered relatively constrained, in the Stafford Borough context, notably Eccleshall and Great Haywood. The proposed strategy of no allocations at either Hixon or Weston is also of note. This is because, whilst neither settlement has a designated village centre conservation area, the specific sites that have been considered closely for allocation are associated with notable historic environment constraint, as discussed in Section 6 and Appendix VI.

Commentary on thematic policies

9.9.6 Policy 41 (Historic environment) largely gives effect to national policy. It is noted that a proactive approach is taken locally to archaeology and wider non-designated assets that appear on the Historic Environment Register (HER), with the HER assets clearly shown on the current adopted interactive policy map. It is recommended that the policy might be supplemented so as to reference the HER.

Conclusion on the draft plan

9.9.7 There are some tensions between the broad strategy / package of proposed allocations and historic environment objective, e.g. relating to Meecebrook (e.g. given its proximity to Eccleshall) and a 100 home proposed allocation in close proximity to Gnosall Conservation Area. However, a degree of tension is largely unavoidable, and there tends to be good potential to avoid and mitigate effects at the development management stage, e.g. through masterplanning, landscaping and design measures.

9.9.8 In conclusion, a broadly **neutral effect** is predicted, but this conclusion will be revisited subsequent to the current consultation taking account of the views of Historic England.

[24] N.B. whilst Historic England has raised concerns, over recent years, regarding the possibility of strategic expansion of Gnosall, it is understood that these concerns were raised primarily in respect of land to the north and to the east of the site currently for allocation; specifically, GNO04(east) rather than GNO04(west). In particular, there has been a concern regarding a non-designated moated site to the north of the A518 (and it is noted that a number of moated sites nearby are nationally designated).

9.10 Housing

Commentary on the spatial strategy

9.10.1 The proposal is to set the local **housing requirement** at 535, on the basis of a locally arising need of 435 (which is a figure above LHN in order to reflect market signals) plus a need to provide for 2,000 homes unmet need (i.e. 100 dpa over the 20 year plan period). Providing for unmet needs is clearly supported, from a housing perspective. Also, providing for a locally arising need above LHN is also supported, because the effect will be to ensure that **affordable housing** needs are met more fully. As discussed in Section 5.2, the EHDNA (2020) found that: *"Affordable housing need is in the range between 252 and 389 affordable homes per annum between 2020 to 2040…"*

9.10.2 The proposed supply is around 18% above the housing requirement, which is a healthy **supply buffer**. Certain aspects of the proposed supply are associated with some notable delivery risk (e.g. sites at Stone close to a level crossing, plus other sites discussed below), however this is fairly inevitable, plus it is the case that additional sources of supply may be identified prior to plan finalisation. Also, there will be the potential to identify additional supply, for the latter years of the plan period, through a local plan review.

9.10.3 With regards to **Meecebrook**, perhaps the key point to note is that it is well located in terms of connectivity to the constrained urban areas to the north and south of the borough, which are either generating, or at risk of generating, unmet housing needs. In particular, it will be well-connected to the Black Country by rail, assuming delivery of a station. With regards, to Birmingham, whilst more distant, there is a clear risk of unmet needs, with a new local plan now in preparation, and an Issues and Options consultation document due for publication this year. With regards to Stoke-on-Trent, there is currently less clarity regarding unmet needs that reasonably should be provided for within Stafford Borough, but the possibility of a need being identified/demonstrated prior to plan finalisation cannot be ruled out.

9.10.4 Delivery risk at Meecebrook is a consideration, with the Viability Assessment (2022) concluding (assuming 40% affordable housing): *"Meecebrook is marginally viable. Further discussions and engagement are needed with the identified landowners to solidify a red line boundary and manage expectations."*

9.10.5 The other point to note is the scale of the proposed new community, with around half of the total capacity expected to come forward beyond the end of the current plan period (2040). In turn, allocation can be seen as a positive step in terms of ensuring flexibility to respond to any ongoing issues of unmet needs.

9.10.6 With regards to the **smaller proposed allocations**, as small and medium-sized sites these have the benefit of being associated with relatively low delivery risk, and potential to come forward early in the plan period. Medium sized sites are also supported in that there is good confidence regarding the potential to deliver the full policy quota of affordable housing.

9.10.7 On this subject, the range of issues and constraints affecting Stafford Station Gateway could indicate that affordable housing delivery may prove challenging. The Viability Study (2022) assumes 20% affordable housing, and concludes: *"Station Gateway is marginally viable. The large number of landowners may lead to complexities with collaboration and equalisation agreements which puts the site at risk."*

9.10.8 Finally, with regards to **Gypsy and Traveller accommodation**, the proposal is to provide for the needs arising from those who meet the PPTS 2015 "planning definition" in full, via two proposed allocations: a site near Hopton for at least 15 pitches; and a site near Weston for at least 10 pitches. With regards to the Hopton site, it is important to note that there is no primary school in the village, and also that the site will serve to extend an existing traveller site, such that it might be well suited to meeting needs arising from that site, as opposed to needs arising from elsewhere in the borough, plus there are arguments for limiting the size of individual sites. With regards to the Weston site, this is in a very rural location, but does benefit from good containment in landscape terms, and direct access to the A518, which is adjacent.

9.10.9 With regards to the needs of those who do not meet the planning definition (~23 pitches), the proposal is to meet needs through the development management process, guided by the criteria set out under Policy 30 (Gypsy and traveller accommodation). However, with a view to avoiding any unforeseen issues, e.g. in respect of overcrowding, or lack of capacity leading to unauthorised pitches in problematic locations, it is recommended that consideration is given to allocating sufficient pitches to meet Traveller needs in full.

Commentary on thematic policies

9.10.10 A suite of housing focused policies is proposed, all of which are strongly supported from a 'housing' perspective. A number of the proposed policy / policy criteria have the potential to generate a cost to developers, and so it will be important to consider implications for development viability, alongside other policy asks, perhaps most notably in respect of net zero carbon development.

9.10.11 Focusing on Policy 23 (**Affordable housing**), a tiered approach is taken, with the proportion of affordable housing required varying according to sub-area within the borough. It is important to note that, other than Meecebrook, the proposed allocations are predominantly in sub-areas where there is the potential to set a requirement for only 20% affordable housing, due to lower development viability combined with a desire to direct limited funds to other matters aside from affordable housing. **Eccleshall** is notable as a higher order settlement where there is the potential to require a much higher rate of affordable housing (40%), but where there are no new local plan allocations (although the village has seen significant recent growth). The conclusions section of the Local Plan Viability Assessment (2022) is clear that there would be the potential to require increased affordable housing were the net zero ambition scaled-back.

Conclusion on the draft plan

9.10.12 There is a clear need to predict **significant positive effects**, given the proposal to set the housing requirement at a figure well above LHN, in order to reflect locally arising needs, including affordable housing needs, and unmet needs from one or both of the nearby constrained urban conurbations. However, there is a slight concern regarding Policy 23 (Affordable housing), which will mean that the requirement is to deliver only 20% affordable housing at some of the proposed allocations. There will be a need for further work prior to plan finalisation, with a view to ensuring that opportunities to meet affordable housing needs locally are set to be realised as fully as possible, albeit recognising that there are competing objectives and funding priorities, including net zero.

9.11 Land, soils and resources

Commentary on the spatial strategy

9.11.1 A foremost consideration here is the need to avoid the loss of **agricultural land** classed as 'best and most versatile' (BMV), which the NPPF defines as that which is grade 1 (highest quality), grade 2 or grade 3a.

9.11.2 Firstly, with regards to **broad strategy**, there are two points to note. Firstly, better quality agricultural land is mainly concentrated to the west of the A34, with Hixon and Weston (where there are no allocations, but the option of allocation is discussed in Section 6 as a reasonable alternative) notable as settlements not associated with better quality agricultural land. Secondly, looking beyond the borough boundary, it is noted that South Staffordshire and Lichfield Districts appear to be associated with a higher proportion of grade 2 land than is the case for Stafford borough, which is potentially relevant as an unmet needs consideration.

9.11.3 The national dataset serves to suggest a likelihood of **Meecebrook** being associated with significant areas of 'grade 2' land. One area of land within the site has been surveyed in detail, namely land associated with flooded gravel pits along the Meece Brook corridor, and been found to comprise 'grade 3a', aligning with the national dataset, which indicates 'grade 3'. However, an area of land nearby is shown by the national dataset to comprise 'grade 2', whilst the 'post 1988' dataset shows 'grade 3a'. Either way, it seems likely that Meecebrook comprises BMV land.

9.11.4 **Stafford Station Gateway** represents a good opportunity to make use of previously developed land, and there are also several other brownfield allocations. However, a number of **other proposed allocations** are also likely to be associated with BMV agricultural land, and potentially higher quality (grade 2) BMV land, according to the national dataset. Only one of the proposed allocations has been surveyed in detail, according to the 'post 1988 criteria' available at magic.gov.uk (namely Marlborough Road, Stone, which is shown to comprise mostly grade 3b land); however:

- Land at Ashflats, Stafford - adjacent land to the east has been surveyed in detailed and found to comprise mostly grade 2 and 3a quality land (also a small about of grade 3b).
- Land north of Redhill Business Park (CRE02) - land adjacent to the east has been surveyed in detail and found to be mostly grade 3a.

9.11.5 Further considerations relate to avoiding sterilisation of minerals and taking into account the presence of strategic waste management infrastructure. These matters are discussed briefly in Appendix IV.

Commentary on thematic policies

9.11.6 There is limited or no potential to avoid or mitigate for the loss of agricultural land through the development management process, as undeveloped land within site boundaries will generally not be retained for agricultural use. A related consideration is support for allotments, orchards and other local food growing, and this is a topic area that might benefit from greater consideration through the plan. There is currently just a brief requirement for allotments to be delivered at Meecebrook.

Conclusion on the draft plan

9.11.7 A fairly limited proportion of growth is set to be directed to previously developed land. However, there is no identified 'reasonable alternative' strategy that would perform better in this respect. With regards to the selection of greenfield allocations, avoiding the loss of BMV / better quality BMV agricultural land appears not to have had a major bearing on the spatial strategy and site selection process, and there are reasonable alternatives that perform better than the proposed strategy (e.g. albeit with drawbacks in other respects, as discussed across Sections 6 and 7).

9.11.8 In conclusion, a **'moderate' negative effect** is predicted, given the likelihood of a quantum of agricultural land being lost to development that might be considered significant.

9.12 Landscape

Commentary on the spatial strategy

9.12.1 With regards to the matter of **broad strategy**, it is not possible to suggest, with any confidence, that providing for a proportion of unmet needs will have the effect of minimising pressure on more sensitive areas elsewhere in the sub-region (see further discussion in Appendix IV). A related consideration is minimising pressure on one or both of the Green Belts intersecting the borough. However, it is difficult to conclude that this is a 'landscape' consideration.

9.12.2 With regards to **Meecebrook**, a detailed appraisal is presented in Appendix IV, and is not repeated here for brevity. In short, whilst there are a range of issues and constraints, overall it is not clear that the site can be considered particularly constrained, in the context of sites of this scale nationally. A primary consideration is potentially in respect of the relationship between the site and nearby Eccleshall.

9.12.3 As for **other proposed allocations**, it seems apparent that landscape has been a significant factor influencing site selection. For example, Land at Ashflats, Stafford, is very well contained in landscape terms, and Land at Marlborough Road, Stone relates well to the existing settlement edge (albeit a short distance to the west is an area of common land and a public right of way). Land east of Stafford Road, Gnosall also relates well to the settlement edge and gives rise to limited landscape concerns overall, certainly relative to the alternative higher growth options that have been considered for this area.

9.12.4 One site that potentially performs less well is Land to rear of Woodseaves School, Woodseaves, noting that the site comprises part of a single agricultural field and is highly visible from the A519. Also, at Stone, one of the two allocations to the east of the town is split in two by a historic lane that is now a public footpath, which does serve to indicate a degree of landscape sensitivity.

9.12.5 Finally, with regards to the question of allocating a large new employment site as a 31.2 ha extension to Redhill Business Park (**CRE02**), the site itself potentially gives rise to limited landscape concerns, given the site nearing completion to the east and the M6 to the west, but there is a general concern regarding the northwards 'sprawl' of Stafford. The southern extent of the site is associated with the Bullockcroft Brook, but then the land rises to a highpoint in the north (where the M6 passes through a cutting), such that there will be a landscape argument for containing the site, and the northern edge of Stafford, to the south of this high point. It is noted that land nearby to the east of the A34 does not have the benefit of being able to draw upon this area of raised land for containment, but instead descends to the Marston Brook, with Marston Lane (a national cycle route) and the Stone Circles Challenge footpath beyond.

Commentary on thematic policies

9.12.6 Firstly, there is a need to note **Policy 3** (Development in the open countryside – general principles), which sets out what types of development are supported outside of settlement boundaries *"in order to protect the countryside from unnecessary and incongruous development."*

9.12.7 Other key policies are those that deal with **design**, notably Policy 34 (Urban design general principles), Policy 35 (Architectural design) and Policy 36 (Landscaping design). For example, the latter sets out that:

"Where development borders an open landscape: 1. Development edges should be predominantly outward facing to activate adjacent space; 2. Strong linear development edges should be "fragmented" by large, open green space corridors…; and 3. Edge of development planting should generally be utilised to filter views rather than blocking them."

9.12.8 A number of policies that are supportive of development could feasibly lead to tensions with landscape objectives. However, there is no reason to suggest any significant degree of concern, recognising that the plan policies will be applied 'in the round' as part of development management / decision-making.

Conclusion on the draft plan

9.12.9 Landscape has clearly been a significant consideration influencing broad strategy and site selection. However, there are inevitably sensitivities associated with Meecebrook, on account of its scale and rural location, and certain of the other smaller proposed allocations are associated with notable constraint.

9.12.10 In conclusion, a broadly **neutral effect** is predicted, having taken account of the proposed suite of site-specific and borough-wide development management policies, which provides a good degree of confidence regarding the potential for effective avoidance and mitigation of impacts.

9.13 Transport

Commentary on the spatial strategy

9.13.1 Beginning with the matter of **broad strategy**, there is currently no evidence to suggest that higher growth scenarios would lead to severe traffic impacts, also noting that the key sites in question do not share road corridors. In turn, the key consideration is a need to support unmet needs from the neighbouring constrained major urban areas being met as close to source as possible, and in broadly 'sustainable' locations from a transport perspective, in the knowledge that without provision for unmet needs in Stafford Borough there could be increased pressure for growth in 'unsustainable' locations elsewhere.

9.13.2 With regards to **Meecebrook**, as an initial point, it is important to recall that there is merit to favouring large mixed use schemes that will tend to support or enable:

- a degree of self-containment, i.e. a situation whereby residents' need to travel beyond the local area is minimised and, in turn, high rates of walking and cycling;
- good access to high quality transport infrastructure (with capacity), in particular public transport infrastructure, such that longer trips (in particular commuting trips at peak times) can be made in such a way that minimises per capita greenhouse gas emissions and traffic congestion (with associated pollution and impacts to economic productivity);
- Masterplanning best practice, including strategic planning for mobility hubs and high quality active travel infrastructure within the site (although there are masterplanning challenges to consider, with a risk of peripheral parts of the site not linking suitably well to the centre); and
- 'Future mobility' interventions / solutions, including those discussed as potentially feasible and achievable, in the context of Meecebrook, within the current Meecebrook Transport Strategy (2022).

9.13.3 In light of these points, Meecebrook is supported on account of its scale and ambition. Also, there is a headline locational opportunity, in that there is the potential to deliver a new train station on the West Coast Mainline. Confirmation of delivery remains some way off, but a feasibility assessment has been completed that indicates: once fully built there is a prospect of station revenue generating a 'medium' level of value for money; there is a 'reasonable' prospect of achieving a train frequency of two trains per hour; and several locations within the site boundary are viable in engineering terms, with at least one with levels of cost estimated to represent 'medium' level value for money.

9.13.4 With regards to viability, there is also a need to take account of the costs of wider transport infrastructure upgrades, including road connectivity to the strategic road network. The new proposed site is notably located between strategic road corridors, such that there will be a need to ensure good links, and the possibility of having to bridge over one or both of the M6 and HS2 corridors might be envisaged. The possibility of new link / relief roads to improve the functioning of the current network has been suggested, albeit in the context of a 11,500 home scheme.

9.13.5 Should it be the case that delivery of a train station cannot be guaranteed, then the transport merits of the site decrease significantly. Staffordshire County Council stated clearly through the Issues and Options consultation (2020): *"A new Garden Community at Meecebrook would require a new rail station to prevent it from becoming a car dominated settlement."* However, it is important to note that this statement was made in the context of an assumed 11,500 home scheme.

9.13.6 Without a train station there would still be good potential to deliver a high quality bus service, linking to Stafford, Stoke-on-Trent and Stone. However, the question arises as to whether one or more high quality (i.e. fast and frequent) bus services could effectively link Stoke-on-Trent and Stafford via both Meecebrook and Stone. This is a detailed question for the County Council and the bus companies.

9.13.7 There will also be a need to carefully consider traffic flows, including noting that the new red line boundary, since the Issues and Options stage is further from the M6 corridor and closer to the A5013. There will be a clear need to consider traffic flows through Eccleshall, and there are likely to be other sensitive / hotspot roads and junctions.

9.13.8 With regards to the proposed package of **smaller allocations**, a number are some way distant from a town centre and/or a rail station, as has been discussed, but a number are located in areas with relatively good bus connectivity, and none are known to be associated with challenges in respect of achieving safe access. With regards to **Stafford Station Gateway**, this is strongly supported, from a transport perspective. Finally, with regards to the question of allocating a large new employment site as a 31.2 ha extension to Redhill Business Park (**CRE02**), the site is thought likely to be an appropriate location for employment growth from a transport perspective, including mindful of likely HGV traffic. This is on the basis that the site is linked to the M6 by the A34 dual carriageway; however, National Highways will wish to comment further in detail.

Commentary on thematic policies

9.13.9 Policy 52 (**Transport**) sets out clearly that proposed development shall be located and designed to minimise the need to travel, with the supporting text explaining that this is a priority from a perspective of seeking to minimise greenhouse gas emissions, and so meet the borough's net zero target date (2040). With regards to the 'location' of development, it will be important to ensure that opportunities to locate development where there will be greatest potential to minimise the need to travel, and enable modal shift away from the private car, are being realised prior to plan finalisation, albeit wide-ranging competing objectives with a bearing on spatial strategy and site selection are also acknowledged.

9.13.10 Policy 53 (**Parking standards**) sets minimum standards (i.e. sets out the minimum number of spaces that must be provided), alongside setting out instances where a number of spaces below the minimum standard would be supported. It is difficult to conclude that this gives rise to any significant tension with transport or decarbonisation objectives, as good off-road parking is supportive of free flowing traffic (i.e. preventing polluting stop-start traffic), reliable bus services and also on-road cycling.

Conclusion on the draft plan

9.13.11 There is clear support for: providing for unmet needs; Stafford Station Gateway; and Meecebrook, on the assumption that it is possible to deliver a train station. Several of the other locations are potentially not ideally located in transport terms, at least from a perspective of supporting modal shift, but there is no reason to suggest any significant concern at this stage.

9.13.12 In conclusion, a **'moderate or uncertain' positive effect** is predicted at this stage, albeit with considerable uncertainty ahead of further detailed work.

9.14 Water

Commentary on the spatial strategy

9.14.1 With regards to the matter of **broad strategy,** water resources / supply and water quality are increasingly recognised as key issues nationally, particularly mindful of climate change scenarios. However, there is currently limited evidence to suggest that Stafford Borough is subject to any particular constraints, in the context of a water-stressed sub-region. A 'Phase 1' Water Cycle Study (WCS) was completed for the Southern Staffordshire local authorities, including Stafford Borough, in 2020; however, this was only an initial 'scoping' study. Focusing on wastewater treatment capacity, the following conclusion serves to highlight the inherent challenge in respect of proactive strategic planning for growth:

"Severn Trent scored a large number of Wastewater Treatment Work (WwTW) red as part of their flow capacity RAG assessment; however, this was based on the 100% growth scenario, which is likely to be an overestimate of growth… Once the [councils] have confirmed which sites will be developed, and [Severn Trent Water, STW] have modelled the additional demand, where capacity is not currently available, STW will complete necessary improvements to provide the capacity… Further study of the wastewater treatment capacity is recommended as part of a Phase 2 Outline study as the Local Plans develop and the [councils] have greater certainty over which sites will be brought forward..."

9.14.2 With regards to **Meecebrook**, there is potentially an opportunity to minimise the impacts of growth, given the scale of the site, the established level of sustainability ambition and early work suggesting good potential to take an 'integrated' approach to water management (see discussion in Appendix IV). However, there is a need for caution ahead of further work to establish what is achievable and potentially viable. Amongst other things, there is uncertainty regarding the supply of potable water ahead of the water company (Severn Trent Water) reviewing its Water Resource Management Plan.

9.14.3 With regards to the proposed package of **smaller allocations**, it is difficult to reach and firm conclusions regarding impacts to water resources or water quality. However, there are clear water-related arguments for strategic growth, with Severn Trent Water stating the following through consultation in 2020:

"Whilst lacking specific locations and detail, generally speaking; string settlement clusters and wheel settlement clusters are unfavourable. This is because although they appear to be individual and separate settlements more often their infrastructure is a single system..."

"Urban extensions and intensification around the edge of larger settlements allows us to focus our efforts on a specific region. Larger settlements often have some capacity which can be released by implementing long term strategic aspirations and can help us reshape our existing systems for the better. Occasionally they do involve some major engineering challenges and therefore close collaboration is encouraged to ensure there is no delay to implementing enabling infrastructure."

"New garden communities often require extensive amounts of new infrastructure and can pose major strategic challenges. That being said they also provide great opportunities to arrange infrastructure in an idealised way and with close collaboration on master planning and delivery they can be great ways to implement innovative systems."

Commentary on thematic policies

9.14.4 A key policy is Policy 4 (**Climate change development requirements**), which deals with water efficiency. The supporting text explains:

"Since [the Water Cycle Study] (JBA, 2020) was prepared, the Environment Agency has updated its classification and it identifies southern Staffordshire as a seriously water stressed region. On that basis the Water Cycle Study recommends that planning policy is used to require the 110l/person/day water consumption target permitted by National Planning Policy Guidance in water-stressed areas. The policy seeks a more ambitious standard of 110/l/person/day. This is consistent with climate change adaptation. A planning condition will be imposed on all planning permissions for housing requiring this to be met."

9.14.5 Also, the following is a key policy requirement for Meecebrook (emphasis added):

"Development can only commence once the necessary strategic infrastructure required to make the new community deliverable - namely the railway station; primary and secondary schools; electricity, gas, clean and wastewater and on-site renewable energy systems; and any necessary strategic highways infrastructure upgrades - are funded and a route is secured for their timely delivery in line with the phasing set out in the framework masterplan."

Conclusion on the draft plan

9.14.6 There is support for strategic schemes, and larger strategic schemes in particular, which suggests a degree of support for Meecebrook, plus there may be a degree of locational opportunity, noting association with the Meece Brook. However, it is too early to conclude support for Meecebrook with any certainty, ahead of further evidence-gathering and discussions with the water company (Severn Trent Water) and the Environment Agency. With regards to development management and site specific policy, there could be merit to further work to confirm what can viably be required.

9.14.7 In conclusion, on balance a **neutral effect** is predicted, but with some uncertainty.

9.15 Overall conclusions

9.15.1 The appraisal predicts mixed effects, as is typically the case with local plans. Positive effects on the baseline (which, it is important to recall, involves a situation whereby development continues to come forward and in a relatively unplanned manner) are predicted under several topic headings and, in two instances, the prediction is that positive effects will be 'significant'.

9.15.2 However, under several other topic headings there are clear tensions between the local plan and sustainability objectives, potentially to the extent that the local plan could result in a negative effect on the baseline (even recognising that the baseline situation is one whereby there are unmet housing needs across the sub-region and/or development comes forward in a relatively unplanned manner).

9.15.3 The following bullet points set out the range of predicted effects using a red/amber/green categorisation:[25]

- **Employment** – a proactive approach to employment land growth is supported, with a proposed supply well in excess of the established need figure, although a 'supply buffer' is appropriate, and the need figure is subject to review, through an updated Economic and Housing Development Needs Assessment.
- **Communities** – directing housing growth so as to deliver new community infrastructure, and avoid breaching the capacity of existing community infrastructure, has been a primary 'driver' of the spatial strategy and site selection process, e.g. the decision to direct a high proportion of growth to Meecebrook. However, the Viability Study (2022) concludes that a Community Infrastructure Levy (CIL) is not viable.
- **Housing** – the proposal is to set the housing requirement at a figure significantly above the established Local Housing Need (LHN) figure that derives from the Government's standard methodology, which is strongly supported. One of the effects will be to deliver additional affordable housing; however, there is a concern regarding the proposal to require just 20% affordable housing at some settlements.
- **Climate change mitigation** – focusing on emissions from the built environment (as opposed to transport), the strategy of directing a high proportion of growth to strategic sites, and Meecebrook in particular, is supported. Also, the proposal is to set stringent development management policy, requiring new homes built to a standard (in terms of emissions) beyond the requirements of Building Regulations.
- **Transport** – the proposal to meet a proportion of unmet housing needs from elsewhere within a constrained sub-region is supported in a number of respects, including in transport terms, because of the importance of meeting needs in locations well connected to where the needs arise from. In particular, Meecebrook is set to be well-connected by rail, assuming delivery of a new station.
- **Air quality** – the plan gives rise to few concerns regarding increased traffic through a known hotspot, namely an Air Quality Management Area (AQMA). However, there is a need for further work to consider traffic flows, and particularly from Meecebrook, given a range of uncertainties, including in respect of strategic road upgrades, bus connectivity and the aforementioned train station.
- **Biodiversity** - the proposed allocations give rise to certain tensions, but primarily in respect of locally and non-designated habitats, as opposed to nationally or internationally designated, and the approach of planning for a proportion of unmet needs from elsewhere in the sub-region is tentatively supported. However, the proposal is to require only 10% biodiversity net gain, in light of viability considerations.
- **Health and wellbeing** – focusing on Meecebrook, there is a clear opportunity on account of its scale, in respect of green and blue infrastructure, and wider health considerations. However, there is a need for further work, for example in respect of avoiding / buffering a high pressure gas pipeline, and ensuring that a polycentric built form is not a barrier to ensuring a well-integrated and well-connected community.
- **Water** – as per a number of other topic headings, the strategy of directing a high proportion of growth to a large-scale new garden community is supported, and there may be a degree of locational opportunity at Meecebrook. However, there remains uncertainty regarding what level of ambition can be achieved, both in terms of water resources and water quality objectives, given cost implications.
- **Landscape and historic environment** – factors have clearly been a key influence on site selection, with a number of the proposed allocations giving rise to limited concerns. There are a range of concerns with Meecebrook, including regarding containment; however, concerns are relatively limited, for a site of this scale, and there will be good potential to avoid and mitigate impacts through masterplanning.

[25] **Red** indicates a significant negative effect; **amber** a negative effect of limited or uncertain significance; **light green** a positive effect of limited or uncertain significance; and **green** a significant positive effect. **No colour** indicates a neutral effect.

- **Land and soils** – a fairly limited proportion of growth is set to be directed to previously developed land; however, there is no identified 'reasonable alternative' strategy that would perform better in this respect. With regards to the selection of greenfield allocations, avoiding the loss of better quality agricultural land appears not to have had a major bearing on the spatial strategy and site selection process.
- **Climate change adaptation** – certain of the sites are subject to a significant degree of flood risk, in particular Stafford Station Gateway, albeit the scheme is supported in wide ranging other respects.

Cumulative effects

9.15.4 The SEA Regulations, which underpin the SA process, indicate that stand-alone consideration should be given to 'cumulative effects', i.e. effects of the Local Plan in combination with other plans, programmes and projects that can be reasonably foreseen. In practice, this is an opportunity to discuss potential 'larger than local' effects. The following bullet points cover some key considerations:

- **Housing needs** – this is a primary 'larger than local' consideration, with a need to consider known, likely or potential unmet needs from one or both of the constrained urban areas (surrounded by Green Belt) to the north and south of the borough. The proposal is to provide for 2,000 homes unmet needs.
- **The economy** – there will be a need to ensure that employment land is provided in line with sub-regional objectives, including in respect of economic growth along transport corridors.
- **Transport corridors** – there is a need to work with National Highways and Network Rail to consider capacity on the strategic transport network, mindful of growth / growth options in neighbouring areas.
- **Cannock Chase Special Area of Conservation (SAC)** – the matter of in-combination impacts within the 15km Zone of Influence is a focus of a stand-alone Habitats Regulations Assessment.
- **Green Belt** – there is a need to support the functioning of the two Green Belts intersecting the borough.
- **Canals** – the canals passing through the borough are a clear larger than local consideration. Growth could direct funds to maintenance and improvement, in line with strategic objectives.
- **Facilities** – can be of sub-regional importance, such as former university facilities at Stafford.
- **Decarbonisation** – new garden communities represent an opportunity to progress best practice nationally, and this is particularly the case for large scale new garden communities such as Meecebrook. A sub-regional modular construction facility could be considered, also potentially support for hydrogen.
- **Agricultural land** – self-sufficiency of food projection is increasingly a key national consideration.
- **Water** – as well as water quality objectives, there is a need to consider aquifers that cross administrative boundaries, and other factors considered through Catchment Abstraction Management Strategies and Water Resource Management Plans.
- **Landscape scale nature recovery** – there is a need to focus efforts on achieving conservation and 'net gain' objectives, in respect of biodiversity and wider natural capital and ecosystem services, at landscape scales, including broad character areas. A Local Nature Recovery Strategy (LNRS) will be forthcoming, under the Environment Act 2021, but steps must be taken in the interim. Aside from matters relating to Cannock Chase SAC, another key focus can be river corridors, most notably the River Trent. Views on strategic issues / opportunities are sought from nature-recovery focused organisations.



Part 3: What are the next steps?

10 Plan finalisation

Publication of the Local Plan

10.1.1 Subsequent to the current consultation it is the intention to prepare the proposed submission version of the local plan for publication in-line with Regulation 19 of the Local Planning Regulations 2012. This will be a version that the Council believes is 'sound' and intends to submit for Examination. Preparation of the Proposed Submission ('Publication') Local Plan will be informed by the findings of this Interim SA Report, responses to the current consultation, further evidence gathering and further appraisal work.

10.1.2 The SA Report will be published alongside the Proposed Submission ('Publication') Local Plan. It will provide all the information required by the SEA Regulations 2004.

Submission, examination and adoption

10.1.3 Once the period for representations on the Publication Local Plan / SA Report has finished the main issues raised will be identified and summarised by the Council, who will then consider whether the plan can still be deemed 'sound'. If this is the case, the plan will be submitted for Examination, alongside a summary of the main issues raised during the consultation. The Council will also submit the SA Report.

10.1.4 At Examination, the Inspector will consider representations (alongside the SA Report) before then either reporting back on soundness or identifying the need for modifications. If the Inspector identifies the need for modifications to the Local Plan, these will be prepared (alongside SA if necessary) and then subjected to consultation (with an SA Report Addendum published alongside if necessary).

10.1.5 Once found to be 'sound' the Local Plan will be adopted by the Council. At that time a 'Statement' must be published that sets out certain information including 'the measures decided concerning monitoring'.

11 Monitoring

11.1.1 There is an increased focus on monitoring nationally, in light of the proposal to reform plan-making to ensuring a clearer focus on achieving clear 'outcomes'.

11.1.2 At the current time, in-light of the appraisal findings presented in Part 2 (i.e. predicted effects and uncertainties), it is suggested that monitoring efforts might focus on:

- Employment land requirements – will require close monitoring, given evolving regional and national context. In particular, the needs of the warehousing / distribution sector are subject to change.
- Housing – the Council already monitors numerous housing delivery related matters through the Authority Monitoring Report, and indicators should be kept under review. There is a need to closely monitor affordable housing delivery by sub-area / viability zone across the borough.
- Agricultural land – it is possible to monitor loss of agricultural land by grade.
- Climate change adaptation – potentially monitor housing in close proximity to a fluvial flood zone (in addition to intersecting); also the 1 in 30 year surface water flood zone.
- Climate change mitigation – it could be appropriate to monitor the proportion of new homes linked to a heat network; also the proportion of homes delivered to standards of sustainable design and construction that exceed building regulations. More generally, there is a need to carefully consider how local plan monitoring links to monitoring of borough-wide emissions.
- Water – ongoing consideration should be given to any risk of capacity breaches at Wastewater Treatment Works (WwTWs) and other risks to the status of water courses. Also, there is a need for ongoing consideration of whether the 'water stressed' nature of the sub-region, and potentially specific aquifers within the sub-region, is such that there is a need to limit further growth.

Appendix I: Regulatory requirements

As discussed in Section 1, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 explains the information that must be contained in the SA Report. However, interpretation of Schedule 2 is not straightforward. Table A links the structure of this report to an interpretation of Schedule 2, whilst Table B explains this interpretation. Table C then presents a discussion of more precisely how the information in this report reflects the requirements.

Table A: Questions answered by this SA Report, in-line with an interpretation of regulatory requirements

	Questions answered		As per regulations… the SA Report must include…
Introduction	What's the plan seeking to achieve?		• An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes
	What's the SA scope?	What's the sustainability 'context'?	• Relevant environmental protection objectives, established at international or national level • Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What's the sustainability 'baseline'?	• Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan • The environmental characteristics of areas likely to be significantly affected • Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What are the key issues and objectives that should be a focus?	• Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment
Part 1	What has plan-making / SA involved up to this point?		• Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach) • The likely significant effects associated with alternatives • Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the draft plan
Part 2	What are the SA findings at this current stage?		• The likely significant effects associated with the draft plan • The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the draft plan
Part 3	What happens next?		• A description of the monitoring measures envisaged

Table B: Interpreting Schedule 2 and linking the interpretation to our report structure

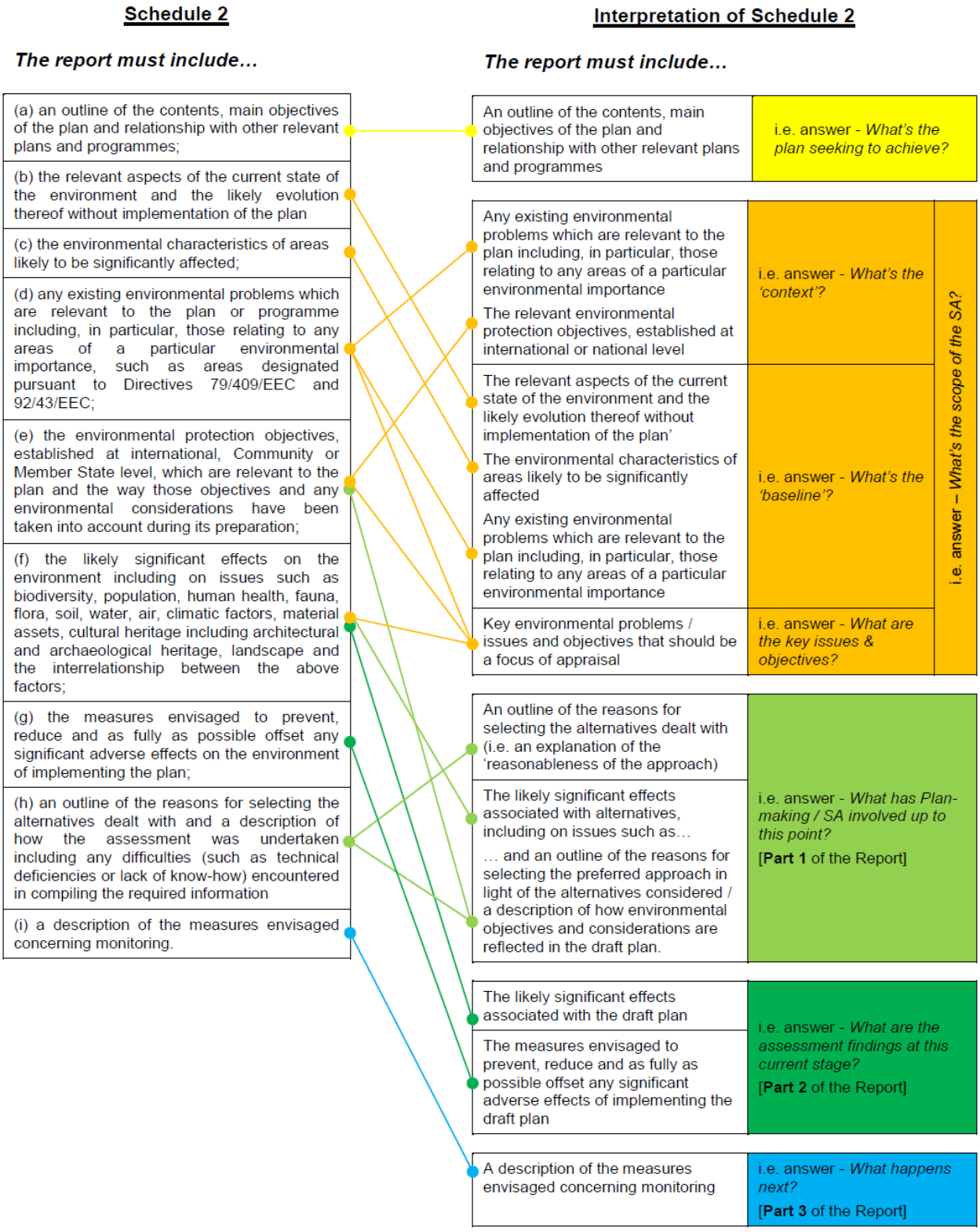


Table C: 'Checklist' of how and where (within this report) regulatory requirements are reflected.

Regulatory requirement	Information presented in this report
Schedule 2 of the regulations lists the information to be provided within the SA Report	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Section 2 ('What's the plan seeking to achieve') presents this information.
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters were considered in detail at the scoping stage, which included consultation on a Scoping Report. The outcome of scoping was an 'SA framework', which is presented within Section 3 in an adjusted form.
c) The environmental characteristics of areas likely to be significantly affected;	
d) … environmental problems which are relevant… …areas of a particular environmental importance…;	
e) The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	The Scoping Report presented a detailed context review and explained how key messages from this (and baseline review) were then refined in order to establish an 'SA framework', which is presented within Section 3. With regards to explaining *"how… considerations have been taken into account"*, Section 7 explains 'reasons for supporting the preferred approach', i.e. how/why the preferred approach is justified in-light of alternatives appraisal.
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors.	Section 6 presents alternatives appraisal findings in respect of reasonable growth scenarios, whilst Section 9 presents an appraisal of the local plan as a whole. All appraisal work naturally involved giving consideration to the SA scope and the potential for various effect characteristics/dimensions.
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Section 9 presents recommendations.
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Sections 4 and 5 deal with 'reasons for selecting the alternatives dealt with', with an explanation of reasons for focusing on growth scenarios / certain growth scenarios. Sections 7 explains 'reasons for supporting the preferred approach', i.e. explains how/why the preferred approach is justified in-light of the alternatives (growth scenarios) appraisal. Methodology is discussed at various places, ahead of presenting appraisal findings.
i) … measures envisaged concerning monitoring;	Section 11 presents this information.
j) a non-technical summary… under the above headings	The NTS is a separate document.
The SA Report must be published alongside the draft plan, in-line with the following regulations	
Authorities… and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)	This Interim SA Report is published alongside an early draft version of the plan in order to inform consultation and plan finalisation.
The SA Report must be taken into account, alongside consultation responses, when finalising the plan.	
The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.	This Interim SA Report will be taken into account when finalising the plan for publication (as discussed in Section 10).

Appendix II: The SA scope

Introduction

The aim here is to supplement section 3 by presenting the SA framework in full, specifically the topic headings that provide a primary basis for structuring appraisal work (i.e. appraisal of the plan and reasonable alternatives) and the supporting objectives taken into account as part of the appraisal.

Topic	Objective(s)
Air quality	• Take action to reverse the trend for increasing emissions by supporting and enabling the use of low emission technologies and actively encouraging sustainable modes of transport such as walking and cycling, particularly where it is possible to leverage the opportunities presented by new development. • Locate and design development so that current and future residents will not regularly be exposed to poor air quality; notably the M6 motorway around Stafford and Clayton.
Biodiversity	• Minimise, and avoid where possible, impacts to biodiversity, both within and beyond designated and non-designated sites of national and local significance. • Achieve biodiversity net gain including through the long term enhancement and creation of well-connected, functional habitats that are resilient to the effects of climate change.
Climate change adaptation	• Adapt to current and future flood risk by directing development away from the areas of the Borough at the highest risk of flooding from all sources. • Provide sustainable management of current and future flood risk through sensitive and innovative planning, development layout and construction.
Climate change mitigation	• Continue to drive down CO_2 emissions from all sources by achieving high standards of energy efficiency in new development, by providing attractive opportunities to travel by sustainable means and by protecting land suitable for renewable and low carbon energy generation, including community schemes.
Economy and employment	• Ensure that education and skills provision meet the needs of the Borough's existing and future labour market and improve life chances for all. • Create high, stable and equitable levels of employment and competitiveness that recognises social and environmental issues, enhancing the vitality of the Borough's town and villages. • Support the needs of the local rural economy. • Ensure that sufficient supporting/enabling infrastructure of the right type is available in the right places and at the right time to support growth and innovation. • Increase the availability of high speed broadband especially in the villages and isolated properties and all new build properties.
Health and wellbeing	• Improve opportunities for access for all to work, education, health and local services • Improve the physical and mental health and wellbeing of Stafford Borough residents, including through enhancing existing health, sports, and leisure facilities and reducing health inequalities between local communities across the Borough. • Reduce the impact of noise and light pollution; including potential traffic noise pollution.

Topic	Objective(s)
Historic environment	• Protect, conserve and enhance heritage assets, including their setting and significance, and contribute to the maintenance and enhancement of historic character through design, layout and setting of new development.
Housing	• Support timely delivery of an appropriate mix of housing types and tenures, including a focus on maximising the potential from strategic brownfield opportunities, to ensure delivery of high quality, affordable and specialist housing that meets the needs of Stafford Borough's residents, including older people.
Land, soils and waste	• Promote the efficient and sustainable use of land and natural resources, including supporting development which makes effective use of previously developed land and avoids the best and most versatile agricultural land where applicable. • Support the County Council's objectives for the sustainable management of minerals and waste.
Landscape	• Protect, enhance and, where necessary, restore the Borough's designated landscape areas and town character, scenic beauty and local distinctiveness, through appropriate design and layout of new development, including the preservation of the Cannock Chase Area of Outstanding Natural Beauty (AONB) and key views.
Population and communities	• Sustain and enhance the vitality and viability of Stafford Borough's towns and villages, and their communities through supporting good access to existing and planned services, facilities and community infrastructure, including green infrastructure, for new and existing residents, mindful of the potential for community needs to change over time. • Locate development in areas that can support accessibility improvements, reducing deprivation within communities across the Borough. • Improve safety within communities throughout the Borough; reducing and preventing crime and reducing the fear of crime • Create a sense of community identity, belonging and pride; encouraging community engagement in local issues, and a strong voluntary sector. • Ensure tolerance, respect and engagement with people from different cultures, backgrounds and beliefs recognising their rights and responsibilities.
Transport	• Ensure that the provision of infrastructure is managed and delivered to meet local population and demographic change whilst helping to reduce congestion and travel times. This includes providing infrastructure that maximises accessibility for all and connects new housing developments to employment, education, health and local services, including public realm.
Water resources and water quality	• Promote sustainable forms of development which minimises pressure on water resources, water consumption and wastewater flows, including the use of innovative features and techniques where possible, to maintain and enhance water quality of the Borough's rivers and aquifers; consistent with the aims of the Water Framework Directive.

Appendix III: Policy alternatives

Introduction

As discussed in Section 4, whilst the focus of work to explore 'reasonable alternatives' has been on the matter of the spatial growth strategy ('growth scenarios'), there is also a need to consider supplementary work to define, appraise and consult-upon alternative approaches to addressing thematic development management policy issues / objectives.

Following discussions, a decision was made to focus attention on one key policy area: Built environment decarbonisation.

Built environment decarbonisation

Introduction

The aim here is to discuss "outline reasons for selecting the alternatives dealt with", present an appraisal of reasonable alternatives and then present SBC officers' reasons for supporting the preferred option.

Selecting reasonable alternatives

The policy framework under which local authorities have been able to consider requiring greenhouse gas emissions standards that go beyond the requirements of Building Regulations has been highly complicated over recent years. This was evidenced by an AECOM study in 2020 (see page 40). The risk is a confusing policy environment, to the detriment of planning applicants and those seeking to scrutinise progress against decarbonisation targets.

However, there has been good progress over the past two years, and the emerging Cornwall Climate Emergency Development Plan Document (DPD), and specifically Policy SEC1, which has been something of a national trail-blazer. The policy has recently been scrutinised as part of the DPD's examination in public, with evidence on the examination website; however, the Inspector is yet to publish any conclusions, or indications in respect of policy soundness.

Important evidence, in respect of the Cornwall policy, comes from

- the policy itself – see page 40 of the submission plan document (examination document SD01);
- an evidence base study prepared by Etude and Currie & Brown – examination document EB42;
- the Council's topic paper on climate change – examination document EB048;
- the Council's viability study – examination document SD06; and
- the hearing statements for 'matter 6' of the hearings agenda.

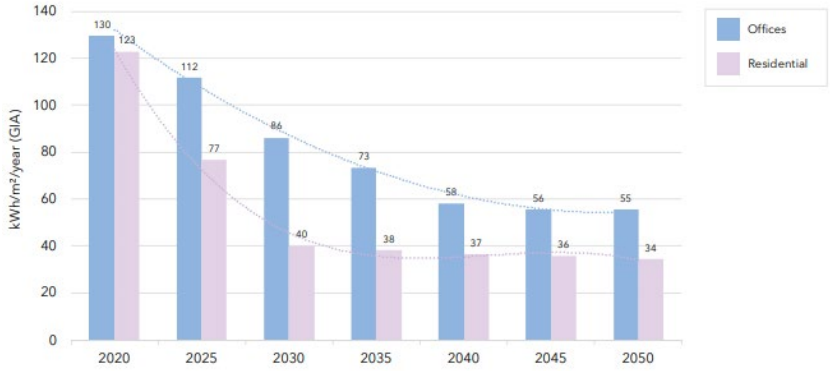
The Cornwall evidence study (examination document EB42) includes a clear focus on using Energy Use Intensity (EUI) as a primary metric, which is otherwise referred to simply as "total energy use" or "energy intensity", and is measured in kWh/M^2/year. The UK Green Building Council, who are a leading organisation nationally, strongly advocate for a new focus on '**energy intensity**', with a report published in 2021 stating:

"The 2025 Part L [i.e. Building Regulations] update must fundamentally change the way energy performance is assessed within the Building Regulations, with a decisive pivot from theoretical comparisons to real-world outcomes (Energy Intensity, i.e., kWh/m2/year) which can be linked to the Net Zero trajectory."

The Cornwall evidence study is clear that, as well as a headline requirement (or set of requirements, for different building / development types), there is a need to break down the requirement as follows:

- Space heating demand – is a factor of building fabric (e.g. insulation, triple glazing), building form (e.g. detached houses lose more heat than terraced houses and flats) and orientation (south facing windows generate solar gain). A space heating demand of **15-20 kWh/m2/yr** has been discussed as a target for new dwellings for some years, as a central pillar of a 'fabric first' (i.e. energy hierarchy) approach to built environment decarbonisation . For comparison, Passivhaus requires 15 kWh/m2/yr and Etude's experience from energy modelling of new domestic buildings suggests a heating demand ranging between 60-100 kWh/m2/yr is typical.
- Total energy use intensity (EUI) – is a factor of space heating demand and the energy used for space heating. This is primarily a question of whether there is a gas boiler or a heat pump, but there is also a need to consider the type of heat pump (e.g. air or ground source) and whether there is any use of direct electric heating, e.g. for hot water. There is broad agreement on the need to aim for total energy use of around **35 kWh/m2/yr** – see figure below.
- Onsite solar generation – must match onsite energy use, if net zero development is to be achieved without offsetting. Potential for solar generation varies greatly according to building form and orientation (e.g. bungalows have highest).

UKGBC suggested trajectory for total energy use intensity (EUI)



The Cornwall DPD proposes the following policy approach:

- Space heating demand - less than 30 kWh/m2/yr;
- Energy use / intensity - less than 40 kWh/m2/yr;
- Onsite renewables (typically solar PV) to match the total energy consumption if possible (i.e. offsetting is supported only where not technically feasible, e.g. where the development involves flats).

Also, the Cornwall DPD evidence base study suggests that the policy might go further, in terms of the stringency of the requirements that it places on developers. Specifically, it discusses a "future policy option" involving:

- Space heating demand – 15-20 kWh/m2/yr;
- Energy use / intensity - 35 kWh/m2/yr;
- Onsite renewables to match the total energy consumption if possible/feasible.

This Cornwall DPD policy has been the focus of scrutiny and discussion as part of the DPD's examination in public, with plan objectors, including the Housing Building Federation (HBF) raising concerns that the policy will overly burden the development industry, risking development viability or necessitating a need to 'trade off' other policy asks.

There is also a suggestion that the policy requirement is contrary to national policy, specifically paragraph 12 of the Government's Planning Practice Guidance (PPG) on climate change, which states: *"The Written Ministerial Statement on Plan Making dated 25 March 2015… sets out the government's expectation that [policies] should not be used to set conditions on planning permissions with requirements above the equivalent of the energy requirement of Level 4 of the Code for Sustainable Homes (this is approximately 20% above current Building Regulations across the build mix)."*

However, Cornwall Council's hearing statement (June 2022) includes clear statements in respect of: A) why the Building Regulations (2021) are not fit for purpose in respect of net zero; and B) why there is the potential to set local requirements over-and-above those of Building Regulations.

In **conclusion**, there are two clear reasonable alternatives. There is also an important question around whether the requirements should vary according to building / development type, but it is appropriate to appraise alternatives that vary in respect of the headline requirement only.

Alternatives appraisal findings

The aim of this section is to present an appraisal of the alternatives introduced above, in summary:

- **Option 1** – The submitted Cornwall DPD approach
- **Option 2** – The more stringent approach discussed in the Cornwall DPD evidence-base as a "future policy option".

With respect to methodology:

> An appraisal of these alternatives is presented below in an appraisal 'matrix'. Within each of row of the matrix, the aim is to explore the merits of the alternatives in respect of one aspect of the SA framework (see Section 3). Specifically, within each row, the aim is to both A) rank the alternatives in order of preference, with "=" used where it is not possible to meaningfully differentiate the alternatives, and "?" used to highlight uncertainty; and B) predict 'likely significant effects' on a five point scale.[26]

[26] **Red** indicates a significant negative effect; **amber** a moderate or uncertain negative effect; no colour indicates neutral or uncertain effects; **light green** indicates a moderate or uncertain positive effect; and **dark green** indicates a significant positive.

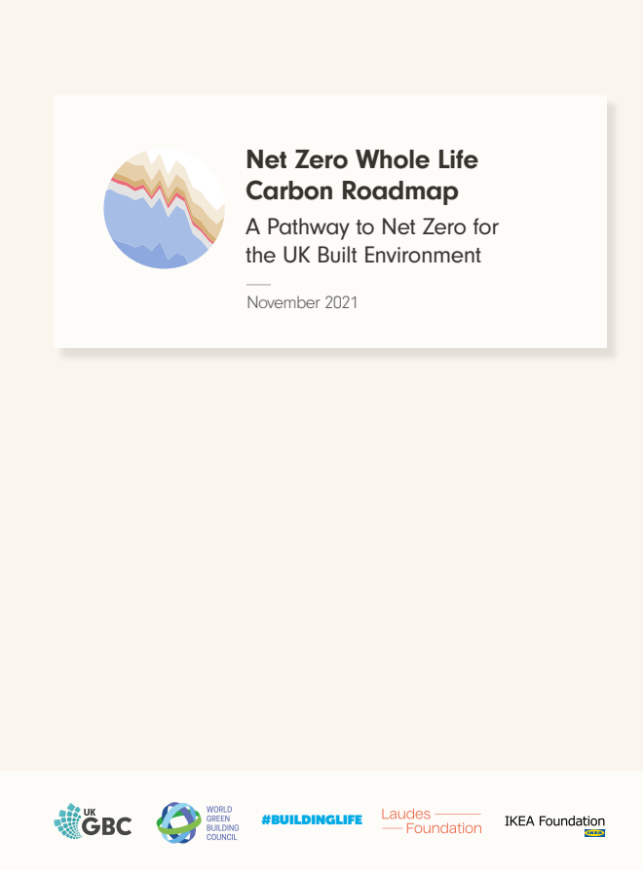
Built environment Decarbonisation – alternatives appraisal

Topic	Option 1 Less stringent	Option 2 More stringent	Discussion
Air quality	=	=	Option 2 is strongly supported from a decarbonisation perspective, mindful of Stafford Borough's 2040 net zero target. It is noted that Cornwall (where the current policy approach is Option 1) has set 2030 as a net zero target date, but Cornwall is a very different context, e.g. renewables potential. There are also wider benefits associated with setting stringent requirements in respect of built environment decarbonisation, perhaps most notably in respect of lower energy bills. The Cornwall DPD evidence study finds that Option 1 would lead to running costs approximately 10-50% lower than a building built to comply with Part L of the 2021 Building Regulations, and the benefits of Option 2 would clearly be higher. This is key consideration, in light of the current national and international energy crisis. Another benefit is in respect of supporting 'the green economy', with the potential to support jobs across the skills spectrum, e.g. in manufacture, construction / installation, assurance / monitoring, maintenance. The possibility of jobs in modular construction is a related opportunity. However, setting ambitious built environment policy does lead to challenges and potential drawbacks, which essentially relate to development viability. The costs involved can feasibly lead to development becoming unviable to the point that it does not come forward, or can lead to development coming forward with 'trade-offs' made in respect of affordable housing, biodiversity net gain, space standards and other 'policy asks'. There can also be a risk of 'corners being cut', but there is little reason to suggest a significant risk. A particular issue is around ensuring good levels of ventilation for buildings with high 'fabric' / air tightness standards, which is a complex area where experience and understanding is still developing, including around how to ensure good ongoing maintenance of mechanical ventilation systems. This is a health and climate adaptation consideration. Returning the potential trade-offs, evidence comes from: • The Cornwall Viability Study (2021) – concludes: *"The overall conclusion.. is that… the additional costs associated with building new dwellings to the standards required in the draft DPD policy SEC 1 can be met without jeopardising viability in most cases. Higher density developments with more flats in lower value areas, rural exception schemes in lower value areas and older persons housing across Cornwall have weaker viability. There may need to be site specific negotiations about planning obligations for some of these types of development and the potential for continued funding support for affordable-led schemes may allow these types of development to continue… Some of the development industry feedback within the process has expressed caution about the practicalities of delivering housing to this new standard in the short term (due to issues around the availability of skills and supply chain limitations)… In the longer term it is expected that the relative costs of DPD policy compliance will fall as energy efficiency and renewable energy become normalised in housebuilding, and as purchasers increasingly seek out homes with better environmental sustainability and lower operational costs."* • House Builders Federation Cornwall DPD Hearing Statement (2022) – concludes that there will be an impact on housing delivery, especially as the likely distribution of growth is towards lower viability areas. • The Stafford Viability Study (2022) – finds that Option 2 could restrict affordable housing, and does not consider the possibility of requiring 20% biodiversity net gain (which other viability studies often do).
Biodiversity	1	2	
Climate change adaptation	?	?	
Climate change mitigation	2	1	
Communities	2	1	
Economy	2	1	
Health and wellbeing	?	?	
Historic environment	=	=	
Housing	1	2	
Land	=	=	
Landscape	=	=	
Transport	=	=	
Water	=	=	

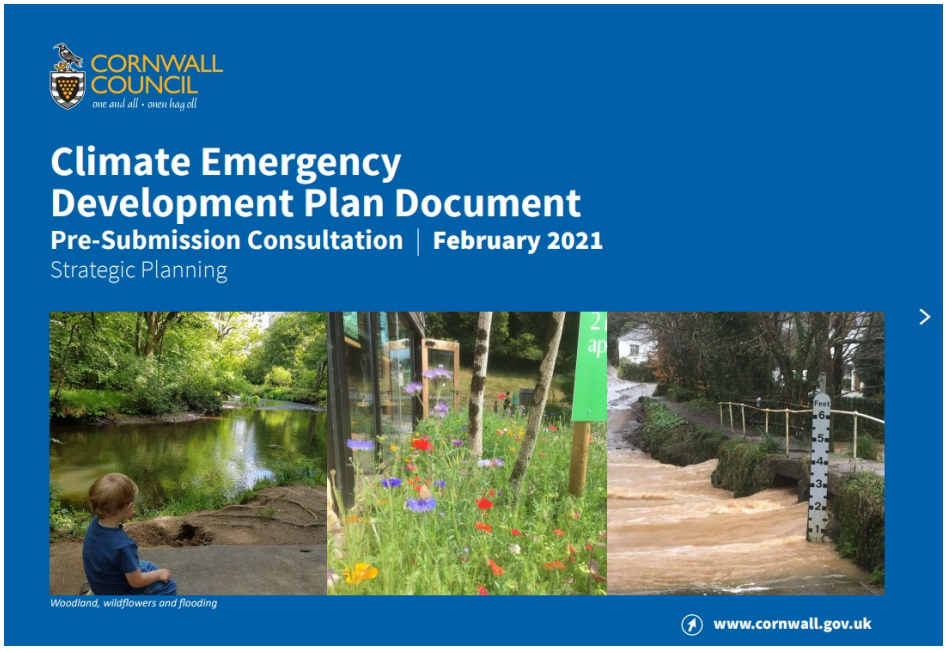
Selecting the preferred option

The following text is provided by SBC officers:

> The Council supports Option 2, i.e. a more ambitious approach to built environment decarbonisation. This reflects of the urgency of achieving decarbonisation, as discussed within the current Climate Change Topic Paper. It is accepted that Option 2 will lead to challenges to the development industry, and potentially some tensions with wider sustainability objectives, including affordable housing, but such issues and tensions are anticipated to reduce rapidly over time, likely in the short term, e.g. the first five years of the plan period.



UKGBC suggested trajectory for total energy use intensity (EUI)



A national trail-blazer / test bed at the current time of writing

Appendix IV: Strategic site options

Introduction

The aim of this appendix is to supplement Sections 5.3 and 5.4 by presenting a comparative appraisal of four strategic site options (or Strategic Development Sites, SDS) that passed through stage four of the SBC officer-led site selection process. Specifically, set out below is an appraisal of:

- two of the strategic site options that were considered through the AECOM study in 2019 and the subsequent Issues and Options consultation in 2020, namely **Meecebrook** and **Hixon Airfield**;
- an amended version of a third site that has been examined since 2019, namely **Southeast Gnosall**; and
- one new strategic site option, namely **Beacon Hill, Stafford**.

These four strategic site options are introduced below. As a final introductory point, it should be noted that the appraisal presented in this appendix does not deal with Stafford Station Gateway, which is a focus of appraisal in Section 9 of this report.

Meecebrook

Meecebrook is comfortably the largest of the options under consideration here, and it is well-established that there is the potential to bring forward a new settlement in-line with garden community principles.

It is also unique in that it is not currently associated with a settlement in the top four tiers of the hierarchy. Rather, it is associated with Cold Meece, which is a fifth tier settlement (albeit the site is also close to Yarnfield).

For several years it has been recognised that a major new development could deliver a new train station on the railway line between Crewe to the north and Stafford / Wolverhampton to the south, such that the site might be well-placed in respect of providing for unmet needs. The site was supported by the Association of Black Country Authorities through consultation in 2020. Detailed work has been ongoing recently to explore the feasibility and viability of a new station.

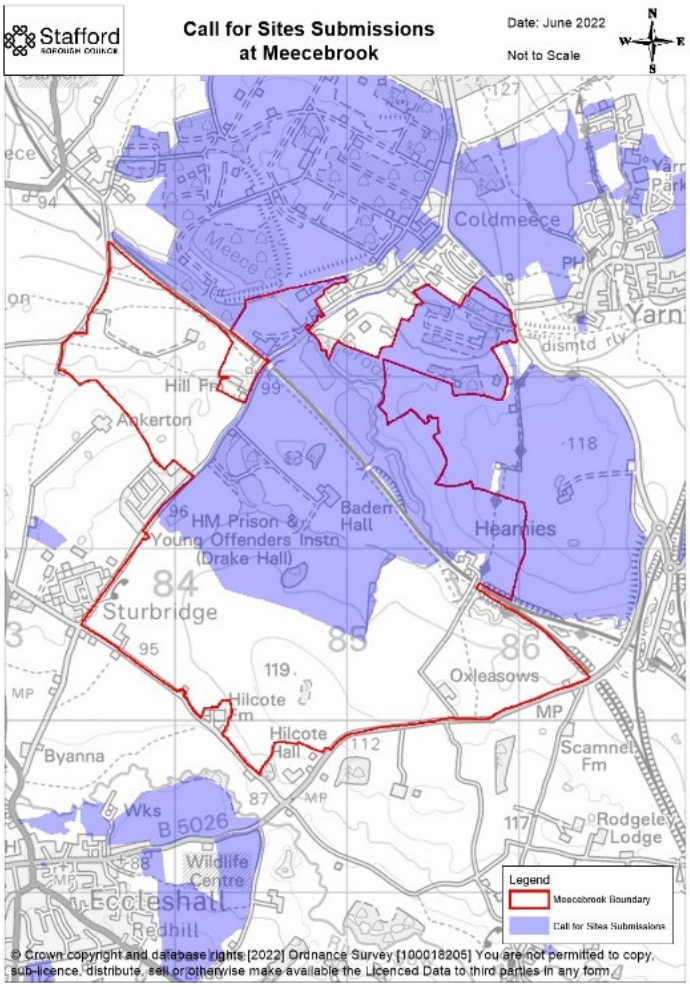
However, there are issues with regards to land availability, with extensive areas of land thought to be available at the time of the Issues and Options consultation (following a call for sites) now unavailable (specifically MOD land at Swynnerton Training Area, and farmland in the vicinity of Upper Heamies). This led the Council to undertake further work to explore land availability, following the Issues and Options consultation, which led to additional land being identified as available. The net effect is that the current site 'red line boundary' is shifted significantly to the west, in the direction of Eccleshall, relative to the assumed red line boundary at the time of the Issues and Options consultation. Within this adjusted red-line boundary there is capacity for at least 6,000 homes, at which scale there would be the potential to deliver a range of strategic infrastructure, likely to include a train station (detailed feasibility work has been completed, but there remain risks and uncertainties). However, a 6,000 home scheme could have drawbacks relative to a scheme of up to 11,500 homes, as previously envisaged.

A final question is in respect of delivery timescales. It is fair to assume delivery across the final 10 years of the plan period, at a rate of between 200 - 300 dpa, hence it is considered fair to assume up to 3,000 homes in the plan period.

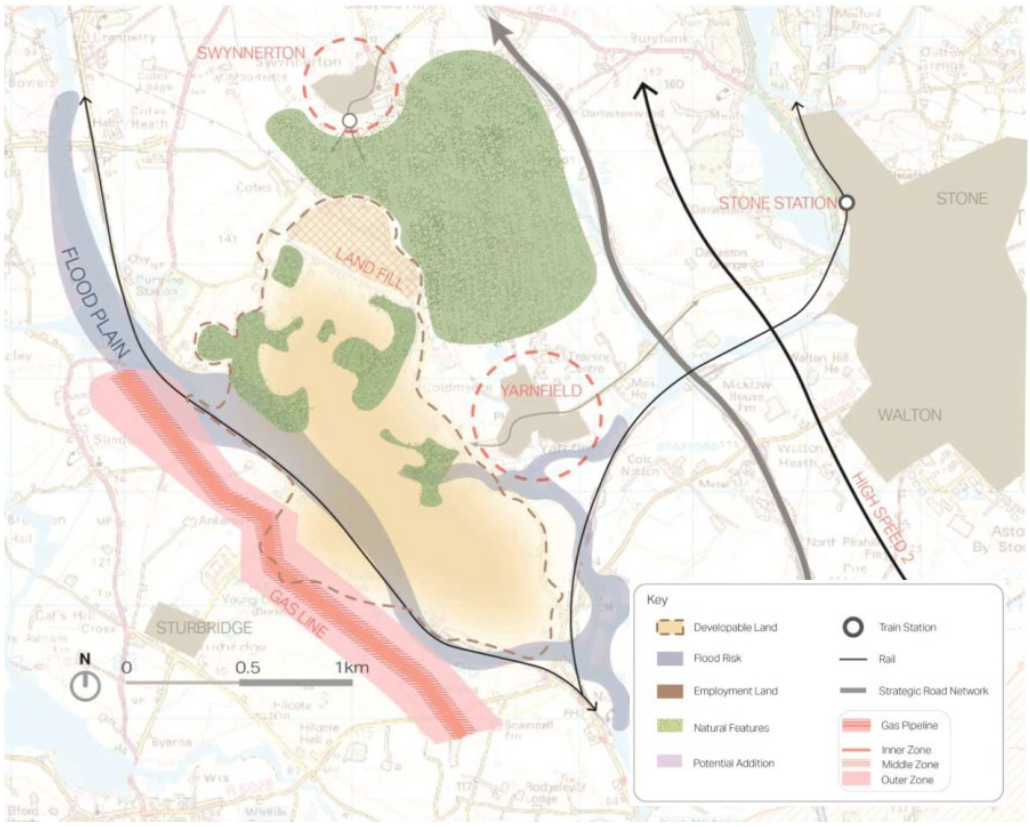
Set out below are four figures:

- The land parcels that were originally a focus of attention in 2019 / 2020 compared to the current red line boundary.
- An early concept masterplan from the AECOM study (2019), showing the extent of a potential 11,500 home scheme. This scheme is no longer achievable due to land availability, but it is appropriate to bear it in mind nonetheless.
- A simplified current concept masterplan highlighting proposed densities, but also serving to clearly highlight:
  - North – the new community here (~690 homes) would relate closely to Cold Meece;
  - East – this is an area of rising land, where the farmland formerly thought to be available is now unavailable;
  - South – the River Sow corridor is to the south of the site, beyond which is Eccleshall;
  - West – the existing Drake Hall Prison and Young Offender Institution, and Raleigh Hall Industrial Estate, would be retained (with the industrial estate extended into the site) and demarcate the western extent of the new settlement, although available ownership does extend further west.
  - Centre of the site – there are two strong linear corridors, namely the Meece Brook / railway corridor and a proposed green spine, which is associated with a high pressure gas pipeline.
- The current concept masterplan, highlighting additional detail.

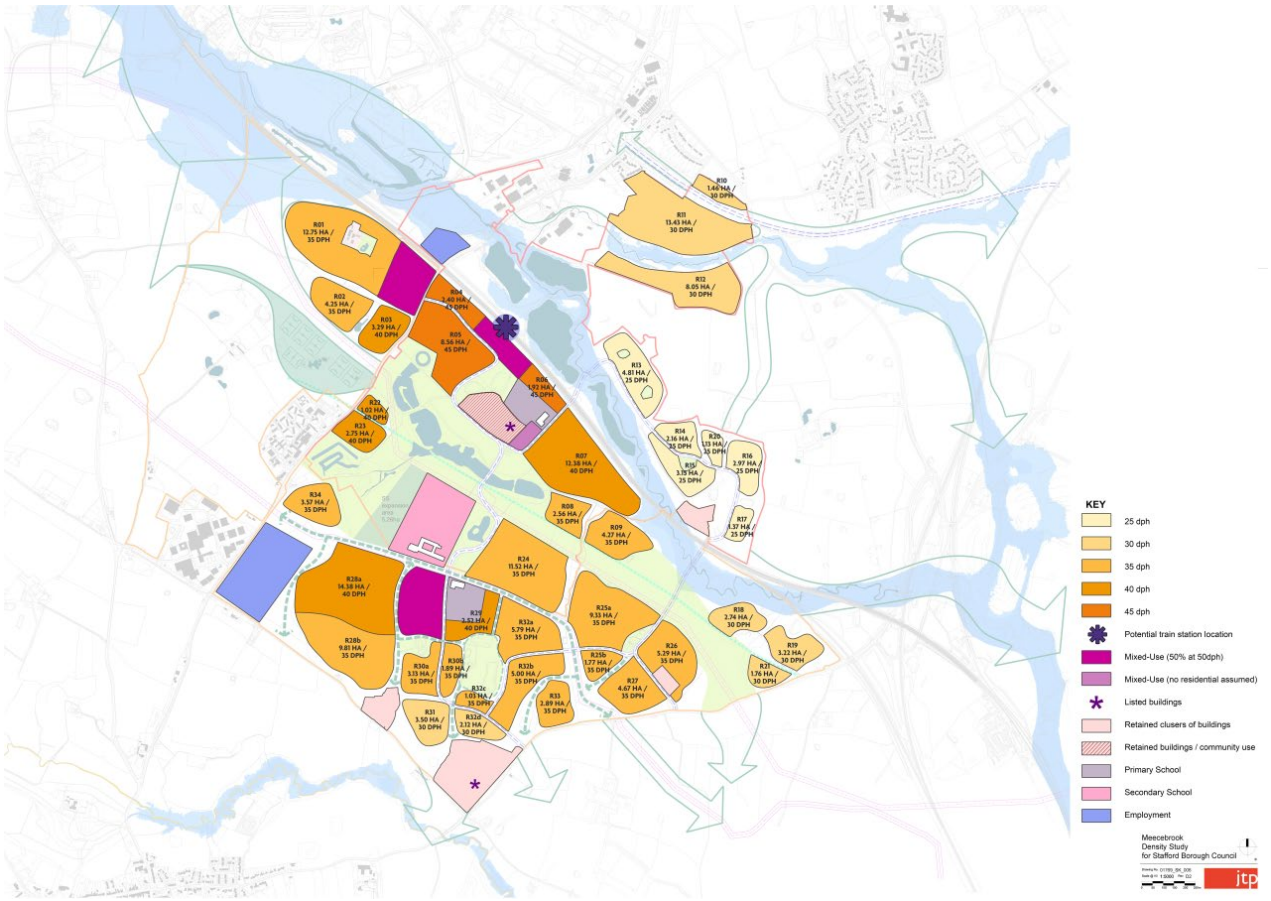
Evolution of the land under consideration



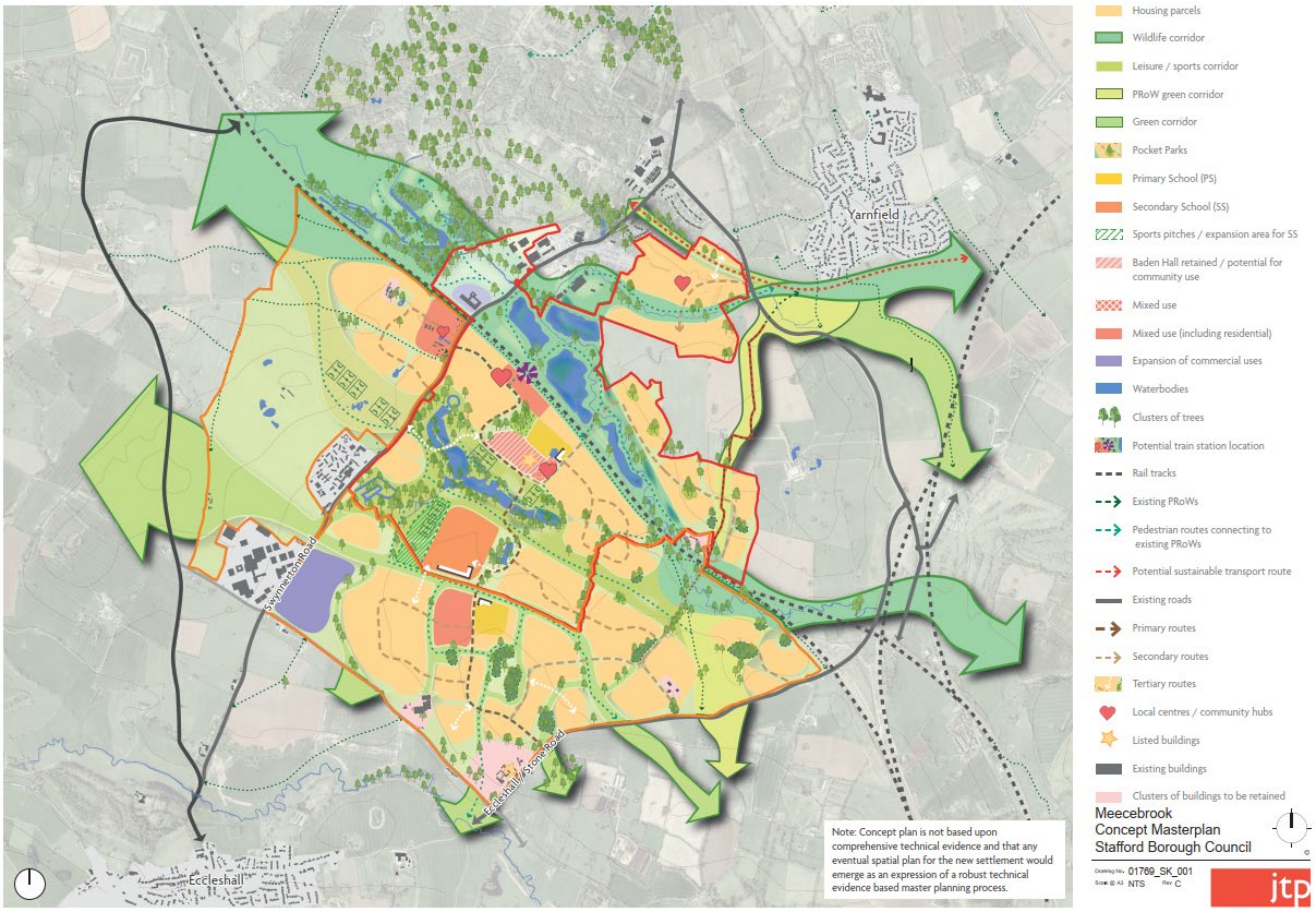
Concept masterplan from 2019 (including extensive land now known to be unavailable)



Simplified current concept masterplan highlighting proposed densities



The current concept masterplan



Hixon Airfield

The proposed scheme here is relatively well understood – see figure below. However, the latest submitted SHELAA site also includes the land to the east of the proposed school / south of the 'leisure facilities' / north of the industrial estate. Also, the current assumption is a need to cap the scheme at 2,000 homes, due to secondary school capacity in Stafford.

The second figure is taken from the AECOM study (2019), and shows the location of the site in a broader context. As can be seen, the scheme would be bounded to the north, and separated from Weston, by the Amerton Brook corridor.

Preferred option masterplan received from the site promoter in 2019



Concept masterplan from 2019



Beacon Hill, Stafford

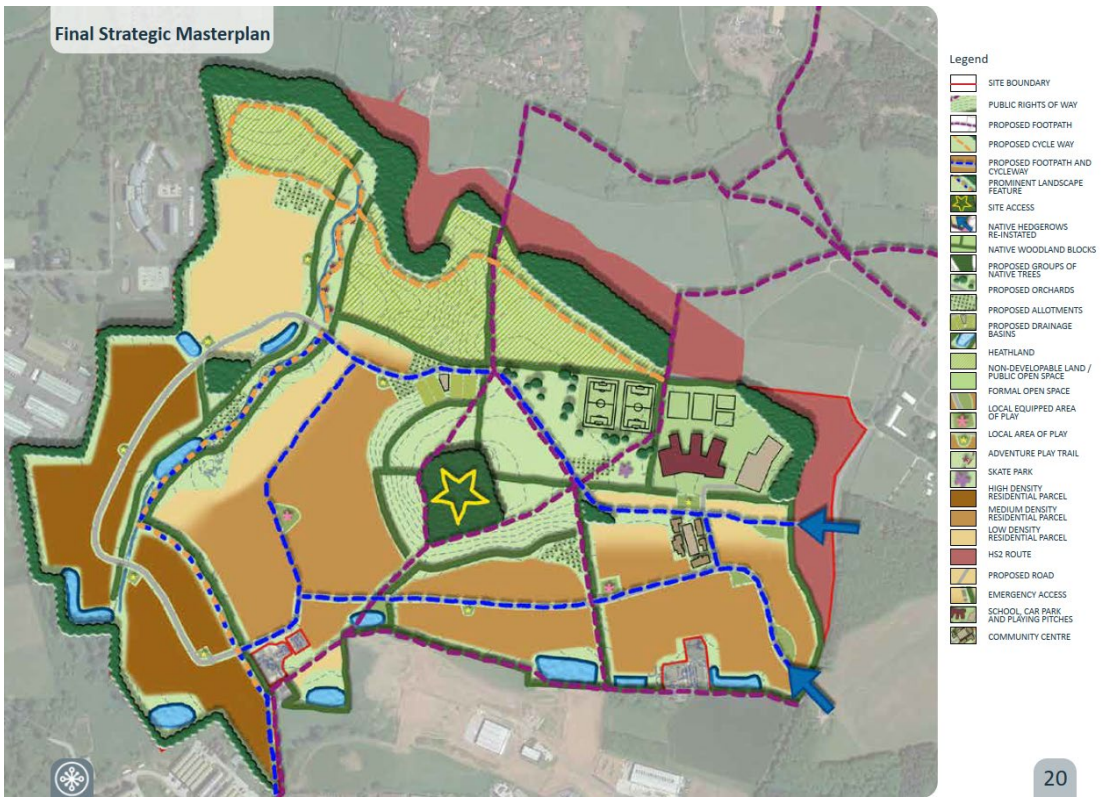
This site was not examined by the AECOM study in 2019, nor was it presented as an option in the Issues and Options consultation document (2020). However, a detailed submission was received from the site promoter through the consultation, and it is now considered appropriate to consider the site as a potential strategic allocation.

The 2019 submission from the site promoters suggested 2,000-2,500 homes and an extension to Beacon Business Park. However, a revised submission was received in 2022, proposing up to 2,000 homes and land for a new secondary school, as well as extensive green infrastructure.

Concept masterplan 2019 (includes business park extension)



Concept masterplan 2022 (no business park extension; increased GI plus secondary school)

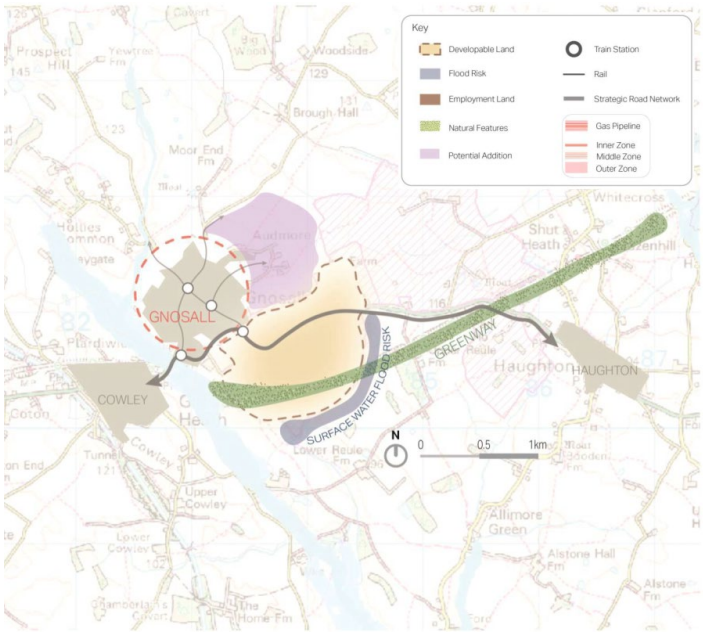


Southeast (SE) Gnosall

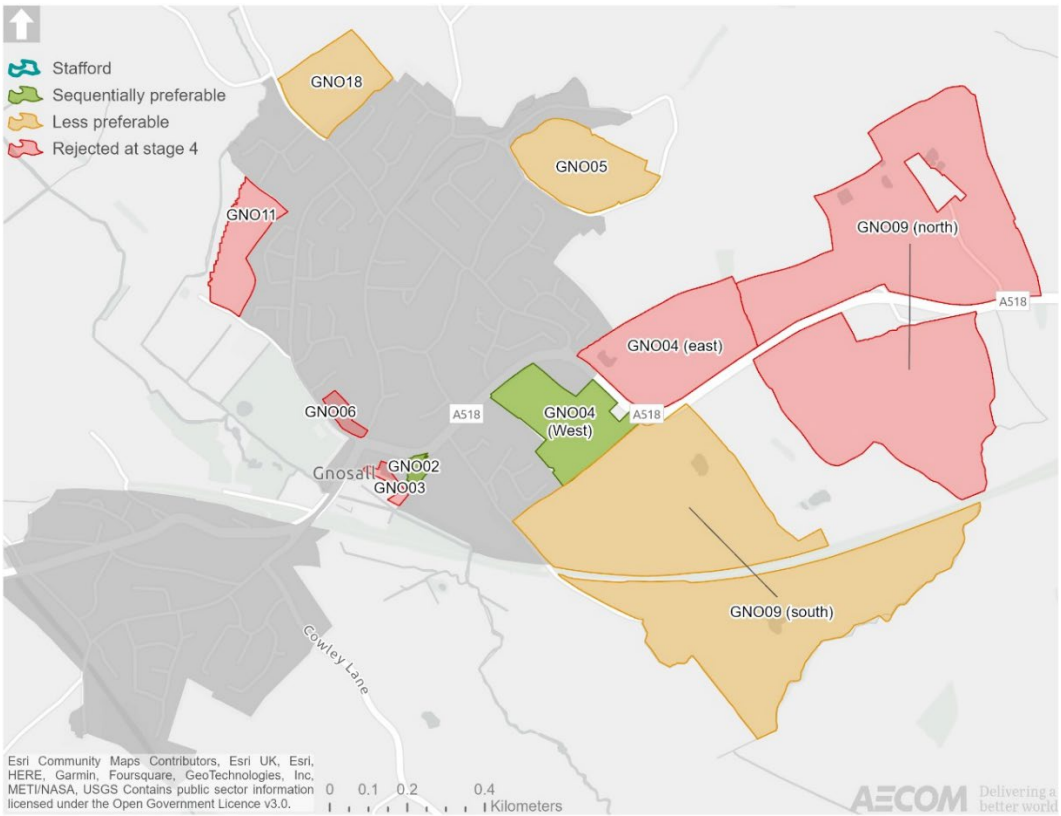
The AECOM study (2019) examined most of the land between Gnosall and Haughton (to the east), but it is land to the southeast of Gnosall that is judged to have greatest development potential. The figure below, which is taken from the AECOM study, shows a potential developable area.

There are broadly three components to this land parcel, which can be differentiated in terms of suitability for development, as per the second figure presented below, which presents the outcome of the SBC officer-led site selection process. The assumption here, for the purposes of appraisal, is a 900 home scheme across all green and amber-rated components (i.e. all growth to the south of the A518). However, it is recognised that in practice there could be merit to considering additional land parcels in order to achieve a suitably comprehensive scheme, with defensible boundaries.

Concept masterplan from 2019



Outcome of the SBC officer-led site selection process (2021)



Appraisal methodology

Appraisal findings are presented below across 13 tables, with each table dealing with a thematic sustainability topic (see Section 3). Within each table the performance of each of the options is categorised in terms of significant effects (using **red** / **amber** / **light green** / **green**)[27] and the options are also ranked in order of preference. Where there is no colour assigned, this indicates effects that are broadly neutral.

Further points on methodology are as follows:

- Significant effects – in accordance with the SEA Regulations, the primary aim is to "identify, describe and evaluate" significant effects in respect of each element of the established appraisal framework in turn. Equally, the aim is to differentiate effectively, regardless of significant effects.

  N.B. 'significance' is defined in the context of the objectives and geographical scope of the plan as a whole, hence there is limited potential to identify significant effects associated with individual site options.

- Systematic appraisal – conclusions on significant effects and relative performance are reached on the basis of available evidence and understanding of key issues and opportunities, mindful of the guidance presented within the Schedules 1 and 2 of the SEA Regulations, and the Planning Practice Guidance.

- Overall conclusions - a final concluding section considers significant effects 'in the round', but does not aim to reach an overall conclusion on the sustainability of each of the options, or place them in an overall order of preference. Any attempt to do so necessitates assigning weight to each element of the appraisal framework, which is outside of the scope of SA (it is a task for the decision-maker, *informed by* SA findings).

- Evidence – a key consideration is the extent to which it is appropriate to take account of materials submitted by site promoters, in respect of proposals for bringing forward sites (e.g. mix of uses, areas of greenspace) and directing limited funds to measures aimed at mitigation (e.g. infrastructure upgrades) and 'planning gain' (e.g. affordable housing). There is certainly a need to take site specific proposals into consideration, including because where detailed work has been undertaken this is an indication of deliverability. However, there is a need to apply caution, as site specific proposals are subject to change, and there is a need to avoid unduly biasing in favour of development schemes for which more work has been undertaken.

Appraisal findings

The tables below present appraisal findings in relation to the large strategic site options.

Air and wider environmental quality

Meecebrook	Hixon Airfield	Beacon Hill	SE Gnosall
2	3	1	3

Stafford Borough is a rare example of a local authority without any designated air quality management areas (AQMAs). However, there is still a need to consider any other existing or potential air pollution hotspots, and be mindful of AQMAs in neighbouring areas. In particular, the entirety of Stoke-on-Trent is designated as an AQMA, as is the entirety of Birmingham and the Black Country. There is also a series of AQMAs designated along main roads in the Cannock area.

Meecebrook is located closest to an AQMA (specifically, the Stoke-on-Trent AQMA). However, this is not a strong indicator of relative air quality constraint, recognising that: there will be good potential to deliver services, facilities and employment as part of the scheme, thereby supporting trip internalisation; there is the potential to deliver a new train station (to be confirmed); and the car journey to Stafford town centre would be significantly shorter than the car journey to Stoke-on-Trent city centre. Also, Meecebrook may be delivered alongside a new junction on the M6, thereby ensuring that traffic could be directed to the strategic road network and minimising concerns regarding traffic through residential areas, including 'rat-running' traffic through villages and along unsuitable rural roads. However, the latest proposed red-line boundary shifts the scheme further away from the M6 corridor, relative to the scheme proposed at the Issues and Options stage, giving rise to a concern regarding Stafford-bound traffic via the centre of Eccleshall.

[27] **Red** indicates a significant negative effect; **amber** a negative effect that is of note but with limited or uncertain significance; **light green** a positive that is of note but with limited or uncertain significance; and **green** a significant positive effect.

With regards to the other three options, it is fair to highlight **Beacon Hill** as preferable, because it would form an urban extension to Stafford, such that there would be good potential to walk and cycle to key destinations. Having said this, there are clear barriers to walking / cycling connectivity, namely MOD land and employment land and A-road corridors.

Focusing on **Hixon Airfield** and **SE Gnosall**, it is difficult to differentiate between these two options with any confidence. The possibility of Hixon Airfield generating some traffic through AQMAs in the vicinity of Cannock might be envisaged, but there is no reason to suggest that this is a significant consideration. At either location a relatively high proportion of trips would be car trips to Stafford (particularly Hixon Airfield, noting Gnosall's links to Newport and Telford, where there are no designated AQMAs) and, in both cases, car trips to Stafford would involve passing through an existing village (Weston, in the case of Hixon Airfield, and Haughton, in the case of SE Gnosall). Gnosall benefits from a better bus service (the route between Stafford and Newport / Telford) and the existing local community infrastructure offer at Gnosall exceeds that at Hixon (e.g. there is a doctors surgery at Gnosall), but Hixon Airfield would be a larger scheme (such that there would be additional opportunity to deliver new community infrastructure onsite). Also, Hixon Airfield would benefit from much better access to employment (both at Hixon and north / east of Stafford; although Hixon Parish Council pointed out, through the Issues and Options consultation, that there is a low incidence of employees living locally).[28]

A further consideration, when seeking to differentiate between the merits of competing strategic site options, can often be noise pollution. However, there appear to be relatively limited concerns in respect of the four sites that are a focus of appraisal here. Meecebrook and Hixon Airfield would be adjacent to a train line (and, in the case of Meecebrook, this is the West Coast Mainline), but it is not clear that this would be a significant constraint.

In **conclusion**, it is judged appropriate, on balance, to highlight Beacon Hill as most preferable, followed by Meecebrook and then Hixon Airfield and Gnosall. With regards to Meecebrook, given the location of the scheme somewhat between strategic transport corridors, it is crucially important that further work is undertaken to understand the potential to deliver new transport infrastructure (road, public transport and walking / cycling / micro mobility) and achieve trip internalisation, followed by work to model likely traffic flows.

With regards to significant effects, broadly neutral effects are predicted under all of the options. The borough is relatively unconstrained in terms of air quality, plus the national context is one whereby nitrogen dioxide (NO_2) pollution is set to reduce year-on-year over the next decade, as the car fleet switches from petrol, diesel and hybrid to electric vehicles (EVs), albeit particulate matter concerns will remain, e.g. from roads, brakes and tyre wear, mindful of the weight of EVs.

Biodiversity

Meecebrook	Hixon Airfield	Beacon Hill	SE Gnosall
2	3	2	1

A primary consideration is growth leading to impacts on internationally important sites and, in this respect, it is clear that there are issues / potential impacts associated with the two sites in the south east of the borough in particular:[29]

- **Hixon Airfield** – is 900-1000m from Pasturefields Salt Marsh SAC, which is a rare example of an inland salt marsh. This is a small SAC, and is not designated as a Ramsar, but is understood to be at risk from nutrient enrichment as a result of air and water pollution. It is also some (limited) public accessibility (managed by Staffordshire Wildlife Trust), but recreational impacts are not known to be a major concern. Hixon Airfield is located upstream of the SAC, and could lead to additional traffic on the A51 (e.g. as an alternative route to Birmingham, in favour of the M6), hence there are clear concerns. There is also footpath connectivity, but via Hixon village (i.e. somewhat indirect).

  Chartley Moss (part of the Midland Meres and Mosses SAC) is also around 1.8km distant (further by public footpath), but is not publicly accessible, and there appears limited potential for hydrological linkage (Cage Hill lies in-between the site and the SAC). With regards to air pollution impacts, there is a minor road adjacent to the SAC, but it seems unlikely that this road would see significant additional traffic, as the A518 would be the preferable route to Uttoxeter.

[28] Hixon Parish Council's consultation response stated: *"During the Hixon Neighbourhood Plan consultation process there was a thorough analysis of where Hixon residents travelled to places of work or education. There was also a questionnaire to local businesses... The analysis revealed that 90% of Hixon residents who travelled to a place of work / education travelled out of Hixon. By contrast, 90% of employees at the three local industrial estates lived outside of Hixon."*

[29] N.B. Habitats Regulations Assessment (HRA) is the appropriate forum for considering matters in detail. The HRA Report published at the time of the Issues and Options consultation is available at: www.staffordbc.gov.uk/new-lp-2020-2040-evidence-base.

- **Beacon Hill** – is also fairly close to the two SACs discussed above, but there appears limited potential for 'impact pathways' relating to recreational impacts, air quality or water quality. More significant are concerns relating to Cannock Chase SAC, which is a large SAC located around 5km to the south. The SAC is known to be at risk of recreational impacts and also nutrient enrichment from air pollution, and, in both respects, potential impact pathways can be envisaged. In respect of recreational impacts, a 15km radius is established as a zone within which a proportion of residents visit the SAC (N.B. all three of the other sites also intersect this zone, but are much less well linked), whilst, in respect of air pollution, the potential for some (albeit limited) additional traffic along the A513 – which runs through the SAC between Stafford and Rugeley – can be envisaged.
- **Meecebrook** – is around 3km from Cop Mere, which is part of the Midland Meres and Mosses Phase 2 Ramsar (N.B. not designated as an SAC or SPA), but not well linked by road. There is a perimeter footpath, but the majority of the area appears not to be accessible, with the mere itself used by an angling club.
- **SE Gnosall** – is within ~5km of Aqualate Mere, which is part of the Midland Meres and Mosses Phase 2 Ramsar (also a National Nature Reserve, but not designated as an SAC or SPA). The potential for recreational pressure can be envisaged with some public footpaths across the area, but the mere is within a private estate not accessible to the public, and the nature of the key habitats present (notably open water) could indicate limited recreational sensitivity (albeit bird populations could be at some risk of disturbance).

Moving on to nationally important SSSIs, there are limited significant risks, over-and-above those discussed above in respect of internationally important sites (all of which are also nationally designated as SSSIs). Gnosall is ~1.6km from Doley Common, which is in unfavourable condition, but this is due to under-grazing, rather than recreational pressure, and the walking route to the common would necessitate first passing through Gnosall village. Beacon Hill is located ~1.9km from Baswich Meadows SSSI ('unfavourable recovering' condition), and is located upstream, but the entirety of Stafford is also located upstream (suggesting no potential for significant impacts) and recreational pressure is unlikely.

Finally, with regards to locally designated Sites of Biological Importance (SBIs), and also priority habitat (a national dataset is available, but is somewhat dated and low accuracy), all four strategic development sites are associated with a degree of sensitivity, including reflecting that all are associated with river / stream corridors. Taking the sites in turn:

- **Meecebrook** – development would be focused on the Meece Brook corridor, and the effect of shifting the site red-line boundary to the west and to the south, since the issues and options stage, is potentially to modestly increase the concern regarding impacts to the Meecebrook SBI, with the current concept masterplan showing housing (~230 homes) in close proximity. However, on the other hand, there is clear potential to deliver targeted enhancements to the Meece Brook corridor, with a view to realising biodiversity and wider ecosystem service objectives.

  Another effect of shifting the site boundary is to increase concern regarding impacts to the sensitive Mill Meece area (specifically land west of the village of Millmeece, and west of the railway line). The nationally available dataset (see magic.gov.uk) does not indicate any priority habitat in this area, but there is an SBI that follows the route of Sytch Lane (associated with 'hedgerows and marl pits') and there is an archaeological priority area associated with 'water meadows'). The current proposal is for development not to extend as far north as this sensitive area, despite it falling within the land ownership boundary, hence there could be an opportunity for targeted enhancements; however, equally, there could be a risk of future development creep leading to pressure on this area.

  On the other hand, the effect of shifting the red line boundary is to greatly reduce concerns regarding impacts to the extensive priority habitat (primarily woodland) and SBIs associated with Swynnerton Training Area (MOD land). There is also a small SBI potentially at risk associated with the dismantled railway line between the development site and the southern edge of Yarnfield, although there are few concerns regarding direct impacts, as this land is located within the Green Belt (which extends south beyond the southern boundary of Yarnfield).

  Finally, with regards to non-designated habitats: as well as the main stream corridor, there is an area of man-made lakes and also a military shooting range, which is associated with woodland priority habitat, although much will be recent secondary habitat (the pre-1914 OS map does not show the lakes, but does show a notable 'covert' at the eastern extent of what is now the shooting range); there is a fairly high density of historic field boundaries across much of the site, although several shown on the pre-1914 OS map are no longer present; and the eastern extent of the site, to the east of the Meece Brook, where ~375 homes are proposed (at a lower density of 25 dph), is associated with a notable series of small, irregular shaped fields which notably include field trees and / or small copses seemingly associated with previous areas of minerals extraction, or past field ponds (these are shown on the pre-1914 OS map). Similarly, fields at the south-eastern extent of the site are associated with a notable series of small woodland copses.

  N.B. potential green / blue infrastructure opportunities are discussed below, under 'health'.

- **Hixon Airfield** – the primary point to note is potentially the airfield's very close association with the Amerton Brook, which is a tributary of the River Trent. Specifically, the wide floodplain of the brook is located adjacent to the north, and is shown to comprise 'floodplain grazing marsh' priority habitat almost in its entirety, although there are no SBIs associated with this part of the brook corridor. The floodplain is not accessible by public right of way, which potentially serves to indicate an enhancement opportunity that might be explored (i.e. development might deliver or facilitate public access along with habitat enhancement) although, on the other hand, this is productive agricultural land. There is also a need to be mindful of the Amerton Brook corridor to the southwest of the site – i.e. between the site and the confluence of the brook with the River Trent – where there is no priority habitat, nor is there a public right of way (linking to the River Trent / canal corridor), which again potentially serves to highlight a potential growth-related opportunity. The Canal and Rivers Trust highlighted this opportunity through the Issues and Options consultation (2020), stating: *"… we recommend early discussion… to identify any potential impacts on the canal and also whether there may be opportunities, such as creating links to the canal towpath to encourage use of the canal as a leisure and recreational resource."* Finally, the following statement received from the Staffordshire Wildlife Trust through the Issues and Options consultation is of note: *"The former Hixon airfield is itself an important site for ground nesting and wintering priority farmland birds, and has been assessed as a potential site of county importance for birds in studies for a previous planning application in the area. The farmland on the site therefore has potential to be a LWS."*
- **Beacon Hill** – the Kingston Brook corridor runs through the site and, whilst this section of the brook is not associated with any priority habitat, the part of brook corridor located to the south – within the Stafford urban area – is associated with extensive priority habitat, and is clearly an important urban green / blue infrastructure corridor. Also, located within the site is Beacon Hill wood, which comprises priority woodland habitat, but is not locally designated, nor is it thought to comprise ancient woodland (according to the nationally available dataset). Finally, it is noted that there are at least three ponds within the site, which might function together as a linked network (e.g. supporting a population of great crested newts) including two ponds that link closely to the brook corridor. The high level concept masterplan received from the scheme promoter suggests a fairly narrow green / blue infrastructure corridor in this area.
- **SE Gnosall** – is potentially the least sensitive of the sites in question, in terms of locally designated habitats and priority habitat. Gnosall is associated with the Doley Brook corridor, but the site would not be directly adjacent (it would be linked by a minor tributary), and there is very limited priority habitat. There appears to be no priority habitat within the site, but there are two ponds (also, a third is located just beyond the site boundary), and a narrow stream corridor, with bankside vegetation (or, alternatively, this may be a field boundary with an associated drainage ditch), forms the southern boundary of the site. Also, the landscape to the southwest, south and southeast is associated with a notable density of small woodland priority habitat patches (not ancient woodland), as well as the Doley Brook corridor (also Allmore Green Common SSSI, albeit this is some way distant to the south). This surrounding landscape is quite highly accessible, via a good network of public rights of way (PROW), and could be well-suited to targeted woodland creation. Finally, it is notable that, whilst the area is part of an 'ancient clay farmlands' landscape character area associated with "an irregular pattern of hedged fields with ancient hedgerows and oaks" there is a fairly weak hedgerow network within the site, with a number of hedgerows having been removed.

In **conclusion**, there is a notable concern associated with Hixon Airfield, particularly in respect of Pasturefields SAC, although the potential for targeted enhancements can be envisaged (both onsite and offsite, focused on biodiversity alongside wider natural capital and ecosystem services objectives). Conversely, SE Gnosall gives rise to fewest concerns, from a biodiversity perspective, plus a degree of biodiversity (etc.) opportunity can be envisaged. With regards to the final two sites, it is difficult to differentiate with confidence, and so they are ranked broadly on a par. Beacon Hill is potentially constrained on account of accessibility to Cannock Chase, whilst Meecebrook's location between (and intersecting) SBIs associated with the Meece Brook corridor gives rise to a degree of concern, ahead of detailed work to understand growth-related opportunities. This order of preference broadly aligns with the following statement made by the Wildlife Trust through the Issues and Options consultation (2020) in respect of the seven strategic site options that were a focus of consultation at that time (N.B. Beacon Hill was not under consideration at this time; and the Meecebrook red line boundary was different): *"… it would appear that… Meecebrook and… Hixon could be the most biodiverse sites... The sites [at] Gnosall… North of Redhill and… East of Weston appear to allow a lesser impact on biodiversity…"*

Climate change adaptation

Meecebrook	Hixon Airfield	Beacon Hill	SE Gnosall
=	=	=	=

The key consideration here is the need to avoid development - in particular new homes - encroaching on fluvial flood risk zones, noting the possibility of expanded flood risk zones under climate change scenarios. A secondary consideration is the need to avoid surface water flood risk zones, noting that it is often possible to deal effectively with surface water flood risk through masterplanning and design measures, including sustainable drainage systems (SuDS). Another consideration is development impacting (either positively or negatively) on water flows and, in turn, down-hill / down-stream flood risk; however, it is difficult to pinpoint issues / opportunities without undertaking detailed work.

As discussed above, all four of the site options are quite closely associated with river or stream corridors, and certain of the sites are associated with notable surface water flood risk. However, at none of the sites is it likely to be the case that flood risk is a barrier to effective masterplanning / delivery of a strategic-scale scheme. Considerations include:

- **Meecebrook** – as well as the Meece Brook corridor itself, there is a need to note that land to the west, in the vicinity of Baden Hall, is a low lying landscape associated with surface water flood risk, although surface water flood channels are associated with a series of lakes (used for fishing), which potentially reduces any concerns. It could feasibly be the case that a desire to maximise densities in proximity to a new rail station (to ensure viability) could conflict with a desire to direct growth away from areas of flood risk. However, at this stage there are no major concerns.

  With regards to flood water attenuation opportunity, Staffordshire Wildlife Trust has stated:[30] *"The Meece brook is an ideal location to focus implementation of natural flood management not only to help alleviate flooding issues within the catchment but will also provide additional habitats."* However, on the other hand, the high density of road and rail infrastructure associated with the Meece Brook at the southern extent of the site (where there is an SBI, and the river follows a natural meandering course) would likely hinder natural flood management interventions, plus areas at risk of flooding downstream within Stafford town centre (also Stafford Station Gateway) are a long distance to the south.

- **Hixon Airfield** – this is a very low-lying landscape, closely associated with the Amerton Brook, close to its confluence with the River Trent. The nationally available dataset provided by the Environment Agency shows the fluvial flood zone extending into the site only to a limited extent; however, there is a need to be mindful of margins of error, as well as the possibility of expanded flood risk zones under climate change scenarios. The concept masterplan received from the site promoter does suggest homes in close proximity to the floodplain (but also suggests more homes than it is thought can be accommodated at the site given available secondary school capacity).

- **Beacon Hill** – the upper section of the Kingston Brook corridor, which runs through the site, is not shown by the nationally available dataset to be associated with fluvial flood risk, but this would need to be confirm through detailed investigation. There is also a need to consider downstream flood risk, given proximity to the Stafford urban edge; however, few homes downstream appear to be at risk (if any) and, in any case, it is not possible to predict, with any certainty, that the effect of development would be to increase rates of surface water run-off / downstream flood risk.

- **SE Gnosall** – a narrow stream corridor (or a field boundary with a drainage ditch) forms the southern boundary of the site, and is associated with a fairly wide surface water flood risk channel, hence there would likely be a need for detailed work to confirm the nature of the flood risk prior to any decision to locate new homes in this area.

Other flood risk considerations relate to flood risk from other sources (e.g. groundwater) and also the degree to which the geology is suited to the most effective forms of SuDS. However, at this current stage, there is no potential to differentiate between the four competing strategic site options in these respects.

Aside from matters relating to flood risk, there is little potential to differentiate between the options in respect of climate change adaptation. However, it is fair to highlight the scale of Meecebrook, which should be supportive of ensuring high quality masterplanning and design, e.g. ensuring extensive green infrastructure within the site (providing shade and supportive of urban cooling) and ensuring that homes are laid out and orientated so as to minimise over-heating risk.

In **conclusion**, there are certain flood risk considerations associated with all four of the sites, but in each instance these are quite minor and, on balance, it is considered appropriate to rank the four options broadly on a par. In practice, at all four of the sites there would be much potential to complete detailed work to avoid and mitigate flood risk, and potentially achieve a betterment. There will be a need to work closely with the Environment Agency.

[30] Staffordshire Wildlife Trust completed a review of several of the competing strategic development site options subsequent to the Issues and Options consultation.

Climate change mitigation

Meecebrook	Hixon Airfield	Beacon Hill	SE Gnosall
1	2	2	3

As discussed in Section 5.2 of this report, strategic growth locations can give rise to an opportunity to minimise per capita greenhouse gas emission from the built environment. The scale of **Meecebrook** serves to suggest the greatest opportunity, although it is recognised that there will be competing funding priorities, e.g. around transport infrastructure. Also, there remain certain unresolved issues around land availability and cooperation between land-owners, which could feasibly lead to challenges, in respect of a fully coordinated scheme with decarbonisation opportunities realised. A 'charter' has been drafted to guide ongoing decision-making, masterplanning etc, which does include a significant focus on taking an ambitious approach to decarbonisation, e.g. stating: *"It will aim crucially to establish comprehensive site-wide green energy infrastructure."* However, certain of the commitments require further scrutiny (e.g. "As the settlement grows renewable energy technologies on-site and in the local area, will generate enough renewable energy to balance the operational and embodied carbon consequent of the new community"),[31] and all will require ongoing scrutiny once detailed understanding of competing costs, notably in respect of transport infrastructure, and available funding is clarified.

Conversely, **SE Gnosall** is considerably smaller than the other three sites under consideration. However, it comprises public sector land, which could help to ensure that funds are made available and directed towards decarbonisation, and good / best practice steps are taken more generally. With regards to **Hixon Airfield** and **Stafford East**, the developer materials received to date do not serve to suggest any particular site or scheme-specific opportunity, in respect of built environment decarbonisation, but there would be the potential to work with the site promoters to explore viable options.

Focusing on the inherent merits of the competing locations, it is not clear that there are any particularly significant opportunities. **Meecebrook** and (to a lesser extent) **Hixon Airfield** are closely linked to a water body that could feasibly provide a source of ambient heat to feed into a heat network, but there is little reason to suggest a likelihood that such a scheme would prove feasible and viable in practice (the chances are greater at Meecebrook, give a proposed scheme at least three times the size of Hixon Airfield). All sites other than **Gnosall** would link closely, and potentially integrate with, significant employment land, which could be a source of waste heat to feed into a heat network; however, once again, this is only a theoretical opportunity to be considered further.

Briefly, with regards to transport emissions, matters have been discussed above, under 'air quality, and are a focus of discussion below, under 'transport', but the headline conclusion is that it is difficult to differentiate between the sites at this stage, in terms of the potential to support trip internalisation / shorter trips and modal shift towards walking, cycling, public transport, electric vehicles and other low carbon modes of travel.

In **conclusion**, it is difficult to conclude that any of the strategic site options under consideration are associated with a *particular* opportunity, on the basis of the available evidence, but it is fair to differentiate between the sites according to scale. There is a need for further work by all land-owners / site promoters to demonstrate why the site in question is an appropriate location to focus strategic growth, from a decarbonisation perspective, and explain how decarbonisation objectives fit with the scheme vision, masterplanning principles etc. There is also a need for further work on viability to understand tensions between decarbonisation objectives and wider objectives, e.g. transport and infrastructure.

With regards to effect significance, there is a need to balance an understanding that climate change mitigation is a global consideration, such that local actions can only ever have a limited effect, with the fact that there is an ambitious local net zero target date / committed decarbonisation trajectory. On this basis, it is considered appropriate to flag a concern.

[31] With regards to 'renewable energy technologies on-site and in the local area', there is a need to consider whether such schemes (particularly if taking the form of solar farms, less so if the opportunity is hydropower) would feed into the national grid, rather than serving the needs of the new community specifically, and would have come forward in any case, regardless of the new community.

Communities

Meecebrook	Hixon Airfield	Beacon Hill	SE Gnosall
1	2	2	3

A headline consideration is the need to ensure that new and existing communities have good access to community infrastructure with capacity. As part of this, there is a need to avoid creating or exacerbating capacity issues and support growth strategies that would deliver new or upgraded community infrastructure, including in response to existing issues / opportunities. This point comes through quite clearly within the consultation responses received in 2020.

Secondary school capacity is understood to be a particularly key issue locally, albeit measuring and planning for secondary school capacity is far from an exact science. The immediate point to note is that **Meecebrook** would deliver a secondary school to serve the new community, and there would also be the potential for the new school to assist with addressing existing capacity constraints in Stone and Eccleshall, although Stone has a three tier education system whilst Eccleshall and Meecebrook would be two tier. Nevertheless this is a very significant consideration.

With regards to **Beacon Hill**, the latest proposal is to make land available for a secondary school, although this is to be confirmed, with the site promoters having stated a need for further work (the current masterplan does not show a location for one or more separate primary schools). There will undoubtedly be costs / competing funding priorities that could preclude the potential to deliver a secondary school and/or the County Council might not support a secondary school in this location (noting proximity to Weston Road Academy). In the absence of a new school on site, students would be able to walk or cycle to Weston Road Academy, which could be expanded to accommodate 2,000 homes (see discussion below); however, the route would take students through Beacon Business Park, which is potentially a significant issue.

With regards to **Hixon Airfield**, there would be a need to expand the Weston Road Academy, with the potential for expansion to accommodate 2,000 homes. However, expansion of the school would likely result in a loss or a reduction to the bus facilities on site, which could lead to significant challenges, given students from Hixon, and other nearby villages, must reach the school by bus. It is also noted that Hixon Airfield has been promoted for more than 2,000 homes, so there would be a need to confirm the potential for a reduced scheme.

Finally, with regards to **Gnosall**, students would be bussed to a secondary school in Stafford that currently has capacity. Gnosall is also of note from a perspective of ensuring primary school capacity. Specifically, whilst a 1,000 home scheme could certainly deliver a primary school, it is noted that the existing village primary school, which is a large and relatively modern facility, is located near adjacent to the site, and there is seemingly land available that could accommodate some expansion. As such, there would be a need to confirm the suitability of the site in question for a new school.

Health facilities are a further consideration, but there is a need for the local NHS Clinical Commissioning Group (CCG) to comment in detail. **Gnosall** benefits from an existing GP surgery (it is not known if there are any capacity issues), whilst **Meecebrook** would certainly be of a scale to warrant delivery of a new facility, albeit there are existing facilities at Eccleshall and Stone. With regards to **Beacon Hill**, the site would be well-linked to the Stafford urban area, including the town centre, so there is little to suggest that it would be an appropriate location for a new health facility. With regards to **Hixon Airfield**, there could well be merit to exploring the potential for a GP surgery to serve Hixon, and it is noted that the high level concept masterplan received from the site promoter does propose to make a significant area of land (5.6 ha) available for retail and community uses; however, again, there would be a need to be guided by the local CCG.

There are other wide ranging considerations, which are discussed under other topic headings. One key consideration relates to the proposed masterplan for Meecebrook, which might be described as somewhat polycentric. This is supported from a perspective of ensuring that extensive green and blue infrastructure is a defining feature, but could also lead to challenges in respect of ensuring easy access to key destinations by active modes of transport.

In **conclusion**, Meecebrook is considered to represent a significant opportunity, and there is also potentially a notable opportunity to deliver new community infrastructure at Hixon to the benefit of the wider village, but equally there could be negative effects felt by the existing community, and the secondary school issue is potentially a concern. With regards to Beacon Hill, the possibility to make land available for a secondary school is noted, also the proposed large country park, plus the site benefits from relatively good connectivity to Stafford including the town centre.

Economy and employment

Meecebrook	Hixon Airfield	Beacon Hill	SE Gnosall
1	2	3	4

The available evidence indicates that existing and committed employment sites *could potentially* deliver a sufficient supply of new employment floorspace in the Borough to meet demand over the plan period, at least in broad quantitative terms (there is also a need to factor-in qualitative considerations relating to various different types of employment floorspace). However, projections of employment land demand / supply balance are inevitably associated with a degree of uncertainty, given uncertainty regarding the national and local economy and changing business needs.

It follows that there is merit to supporting mixed used schemes that deliver new employment floorspace. In this respect **Meecebrook** stands out as performing well, as – assuming significant transport infrastructure upgrades, including a possible new junction onto the M6 – there is the potential to deliver ~15ha of employment land. The potential for the new employment area to develop a profile as a valued hub on the M6 between Stafford and Stoke-on-Trent can be envisaged, although there is a need to note the proximity of the industrial and business park at the southern edge of Stone, which is considerably larger (~80 ha including the recently completed land).

There is also potentially an employment land opportunity at **Hixon Airfield** and **Beacon Hill**. With regards to the former, the concept masterplan suggests delivery of a science / technology park, which would link well to the existing / committed industrial area to the south. With regards to the latter, an early concept masterplan suggested the potential to deliver a further expansion to the Beacon Business Park, but this is no longer the proposal. In both cases there would be a need for further work to confirm whether new employment would serve to meet an existing demand or, alternatively, whether the land in question might better be put to use to deliver residential or another use, e.g. green / blue infrastructure (without unduly affecting viability). With regards to additional residential in place of employment, there is a need to recall the secondary school constraint, which is understood to limit the number of homes that can be delivered at both sites.

Finally, with regards to **SE Gnosall**, there is no strategic employment land opportunity, but the potential to deliver some small scale new employment land can be envisaged (there is currently no employment land at Gnosall). Also, there is a need to note that Gnosall is less well connected to major conurbations to the north and south than the other sites.

In **conclusion**, there is a need for further work, but at this stage it is appropriate to highlight that Meecebrook and Hixon Airfield could represent an opportunity of 'modest and / or uncertain' significance. It will be important to gather views through the current consultation (e.g. Stoke and Staffordshire Local Enterprise Partnership), and it is anticipated that the Economic and Housing Development Need Assessment (EHDNA, 2020) will be revisited prior to plan finalisation.

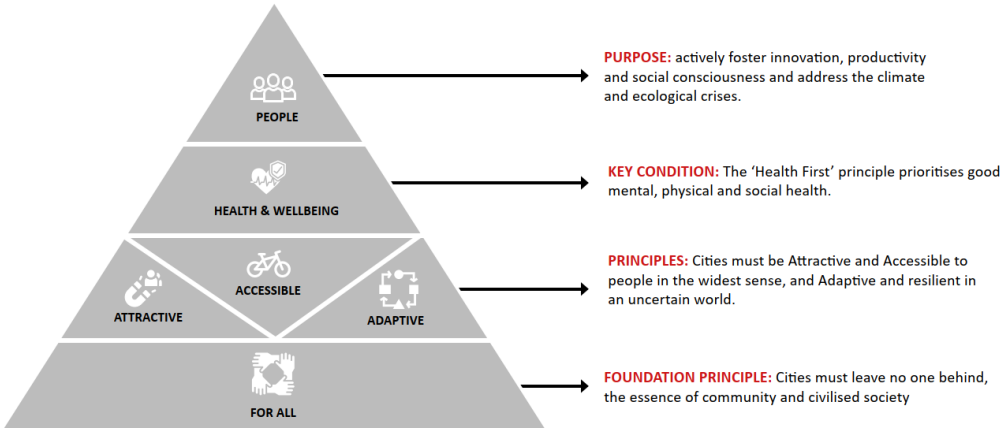
Health and wellbeing

Meecebrook	Hixon Airfield	Beacon Hill	SE Gnosall
1	2	2	2

Primary considerations here relate to masterplanning, design and 'place making', as well as ensuring good access to green and blue infrastructure, mindful that other 'communities' considerations are a focus of discussion under a separate heading above, including the matter of access to health facilities.

There is a focus nationally on achieving high standards of masterplanning, design and place-making, as well as delivering high quality community and green / blue infrastructure, in support of objectives around: health and wellbeing; 'levelling-up'; and resilience to climate change and any risk of a future pandemic or similar crisis. The new NPPF (2021) is notable for a major new focus on use of design codes and, whilst there is little in the way of an explicit focus on health objectives (rather the focus is on *"creating beautiful and distinctive places with a consistent and high quality standard of design"*), it is fair to anticipate that health objectives will be central to work on design codes in practice. Also, a recent report (April 2022; resiliencebrokers.org/project/key-cities) called for a new **health-focused** approach to town and country planning nationally, specifically: *"One that moves away from having the delivery of housing numbers at its core, and replaces this with a holistic vision of health. Affordable, quality housing is still a critical issue of course, but it is one in an array of conditions necessary to support good health."* The report presents a conceptual framework – see below.

Health and planning priorities



There are well established opportunities associated with new garden communities, including around delivering new health infrastructure, supporting walking / cycling, and ensuring good access to gardens, sports facilities, greenspace and countryside.[32] In this light, **Meecebrook** represents a clear opportunity, as there is a firm commitment to deliver a major new settlement in accordance with garden community principles. The landscape framework within which the site is located could be supportive of these aspirations, notably the close association with the Meece Brook and a series of flooded gravel pits (some now used as fishing lakes). Given the scale of development, ambitious green and blue infrastructure enhancement options should be considered, including making accessible a large stretch of the Meece Brook Valley (also the flooded gravel pits at Baden Hall) that currently has limited public access, alongside enhancement measures aimed at realising biodiversity and other wide range ecosystem service benefits. However, there are also potential challenges, from a health and wellbeing perspective, including: the railway line; the potential for impacts to the Stone Circles Challenge long distance footpath, which links Stafford to Stoke (albeit the revised site boundary reduces concerns); the potential for some parcels on the extremity of the new settlement to be less well linked to the centre / community infrastructure; and the high pressure gas pipeline that passes through the site (it is understood that this has fed into masterplanning completed to date, but there is a need for further clarification on any residual risk). A final consideration, in respect of Meecebrook, is that it would be delivered as a more-or-less stand-alone new settlement, such that impacts to existing communities might be lower than would otherwise be the case for an urban extension.

With regards to **the other three options**, it is not anticipated that the schemes would be delivered in complete accordance with garden community principles (particularly SE Gnosall, which is the smallest scheme). However, there would still be the potential to deliver high quality green and blue infrastructure within the sites, and potentially offsite enhancements (these have been discussed above, under 'biodiversity', e.g. Hixon Airfield benefits from proximity to valued river corridors). All three sites benefit from good connectivity to surrounding high quality countryside via PROW (perhaps less so Hixon Airfield) and this is particularly the case for SE Gnosall, which is linked to Stafford by The Way for the Millennium cycle path, which might feasibly be the focus of some additional investment as a result of development. Focusing on Hixon Airfield and Beacon Hill, the high level concept masterplans prepared to-date (see above) indicate focus areas for green and blue infrastructure, but there would be a need for further discussions, mindful that, in both cases, the concept masterplans were prepared with a view to delivering a scheme involving in excess of 2,000 homes, whilst current understanding is that there is capacity for only up to 2,000 homes, due to secondary school capacity. Focusing on Hixon Airfield, the concept masterplan suggests a 'country park', but the scale of the parkland is not extensive, such that it is not thought likely that it would prove an attractive destination for existing residents of Hixon.

Retaining the focus on **Hixon Airfield**, the following statement made through the Issues and Options consultation (2020) is also of note: *" A new settlement on the edge of Hixon would seriously affect the village and surrounding area. It would effectively be creating a 'dual' village with Hixon becoming an outlier of the new settlement, lacking integration between the two halves… The provision of new / improved services and facilities which could be used by Hixon residents is unlikely to outweigh the negative aspects … Hixon Airfield is located in the rural area and is bordered by three villages, each with their own distinct local character. The site would dwarf the villages of Hixon, Stowe-by-Chartley and Weston."*

In **conclusion**, the discussions presented above serve to indicate opportunities more so than risks. Meecebrook is associated with the greatest opportunity on account of its scale; however, it is difficult to predict 'significant' positive effects, mindful of the wide range determinants of health, and because it is not clear that green and blue infrastructure enhancements would be 'strategic' to the extent that there are significant benefits to existing communities as well as the new community. It will be important to revisit this matter subsequent to the current consultation, at which time more will be known about site-specific opportunities, e.g. around on-site and offsite strategic green and blue infrastructure.

[32] e.g. see england.nhs.uk/ourwork/innovation/healthy-new-towns; and tcpa.org.uk/guidance-for-delivering-new-garden-cities

Historic environment

Meecebrook	Hixon Airfield	Beacon Hill	SE Gnosall
2	1	1	3

It is appropriate to begin the discussion by considering **SE Gnosall**, because the site is located in close proximity to the small village centre conservation area, which includes the grade 1 listed parish church, albeit there are only three further grade 2 listed buildings within the conservation area. The site would not be directly adjacent to the conservation area, and whilst visible from the A518 on the approach to the conservation area, from the east, would be seen in the context of modern development on the opposite side of the road, plus there is a modern development (within the past ten years) to the west of the west of the site, which is adjacent to the conservation area.

The only PROW through the site is The Way for the Millennium, which follows a disused railway, and this is located within the southern part of the site ~800m from the grade 1 listed church, such that there are not thought likely to be significant views of the church (although the topography does rise slightly to the church).

Other than the conservation area, the only other readily apparent historic environment concern relates to the former railway line, which features in the local Historic Environment Record (HER). Whilst Historic England has raised significant concerns, over recent years, regarding the possibility of strategic expansion of Gnosall, it is understood that these concerns were raised primarily in respect of land to the north and to the east of the site currently under consideration. In particular, there has been a concern regarding a non-designated moated site, associated with a series of farm buildings ('Moat Farm') to the north of the A518 (and it is noted that a number of moated sites in the area are designated as a scheduled monument). To reiterate, the site currently under consideration does not include land to the north of the A518; however, it is recognised that development to the south of the road could set some precedent.

The other three sites are considered *relatively* unconstrained in historic environment terms, in the context of strategic development site options that typically come into consideration for allocation nationally. Taking the sites in turn:

- **Meecebrook** – an immediate point to note is that the MOD land previously included within the site boundary is now excluded, such that there are greatly reduced concerns regarding impacts to Swynnerton Hall Park (albeit not nationally registered) and Swynnerton Conservation Area. However, the possibility of 'rat running' through the conservation area, as a direct route towards Stoke-on-Trent, remains a significant consideration.

  The next matter to consider is Baden Hall, which is grade 2 listed (C17 in origin, refashioned early C19 and with later alterations) and quite central within the proposed site. It was formerly associated with an area of parkland (shown clearly on the pre-1914 OS map) and the area of former parkland is included in the local HER, plus the former lodge house is still present, on the Swynnerton Road. The hall is currently used for functions, and associated with a fishery, plus there is a nearby PROW (albeit following the railway), such that it is likely to be appreciated by residents of the area. However, it is difficult to suggest that a single grade 2 listed building represents a significant constraint, including as there would be good potential to integrate the building, and its curtilage, within green / blue infrastructure.

  A second grade 2 listed building is Hillcote Hall, at the very south-eastern extent of the site, which is currently used as a care home. From the Hall, the new proposed southwest boundary of the site is defined by High Lanes, along which there is a historic farm and a series of historic cottages which, whilst not listed (or featuring in the HER), are shown on pre-1914 OS map. The lane, as a whole, has a clear historic rural / agricultural character.

  Another farmstead located onsite is lower Heamies, which again is not associated with any listed buildings, nor highlighted in the HER, but noting the historic field / hedgerow pattern in this area, as well as the notable density of ponds, copses and field trees. Nearby Middle Heamies and Upper Heamies were included in the previous site boundary, and their removal from the site boundary is potentially supported, from a historic environment perspective, noting that these are farmsteads that are linked to Yarnfield, to the north, rather than the Meece Brook corridor.

  The final farmstead located on site is Hill Farm, which is notably associated with a PROW. However, this is a part of the site currently presumably strongly influenced by the railway and the Swynnerton Road (which is an undesignated road, but appears to have less of a rural lane character than is the case for the aforementioned High Lanes).

  Looking beyond the site boundaries, the primary concern relates to Eccleshall, given the revised site boundary. Eccleshall is associated with an extensive conservation area and a large number of listed buildings, including Eccleshall Castle, and there would be a need to avoid significant increased traffic through the main historic core (see further discussion below, under 'landscape).

The next offsite consideration is the Mill Meece area, to the north of the site, where Sytch Lane is a very narrow rural lane, and the HER indicates an extensive area associated with historic water meadows. The grade 2* listed parish church at Slindon is also nearby. In this light, from a historic environment perspective, there is arguably a need avoid the risk of development 'creep' towards this area over time.

Other offsite considerations relate to: Yarnfield is shown as an established village on the pre-1914 OS map, but there are just two listed buildings; and Shallowford, between the site and Stafford, which is associated with a cluster of listed buildings, including Isaac Walton's Cottage, and could see some rat-running traffic.

Finally, with regards to archaeology, an initial review was undertaken in 2021 (albeit a different site boundary), which found that archaeology is unlikely to be a major constraint, but that is not to say there would not be significant issues to be considered as part of masterplanning and at the development management stage.

- **Hixon Airfield** – there are no listed buildings onsite, but the three villages located to the west (Weston), east (Stowe-by-Chartley) and south (Hixon) are all associated with a degree of historic character (perhaps less so Hixon), albeit none of the villages have a designated conservation area. The next most significant constraint is potentially the WWII military heritage associated with the airfield, although the airfield was used only for training. Finally, with regards to archaeology, work completed to date has found that the potential for development to be constrained by previously unrecorded pre-WWII archaeological remains is considered to be low.
- **Beacon Hill** – there are no listed buildings onsite or nearby, but this landscape is likely to have a degree of sensitivity, from a historic environment perspective. Matters are discussed below, under 'landscape', but, in brief, Beacon Hill is a prominent feature in the landscape, and is crossed by historic footpaths linking Stafford (the historic county town) to valued and historic landscapes to the east, including Hopton Heath, which is a registered battlefield. A further consideration is the two farmsteads located within the site, both of which are shown on the pre-1914 OS map. Both are associated with public rights of way, and one is visible from the A518.

In **conclusion**, whilst none of the sites in question give rise to significant concerns, it is appropriate to flag a 'moderate or uncertain' risk of significant negative effects for SE Gnosall, mindful that Historic England has raised concerns in the past, in respect of strategic growth at Gnosall, albeit not concerns with the specific site currently under consideration. It is difficult to confidently differentiate between the other three sites, but on balance it is considered appropriate to highlight Meecebrook as being associated with some notable historic environment sensitivities, which would need to be addressed through masterplanning and development management.

Housing

Meecebrook	Hixon Airfield	Stafford East	SE Gnosall
1	2	2	3

An immediate point for consideration is the scale of **Meecebrook**, and the following statement made by the Association of Black Country Authorities (ABCA) through the Issues and Options consultation in 2020:

"ABCA supports the potential for Meecebrook (Option D) to be allocated as a new Garden Community. The site has the potential to provide up to 11,500 new homes and related employment uses, which will be to the mutual benefit of Stafford and the Black Country. We note that the site assessment work undertaken by AECOM suggests that Meecebrook, along with Hixon (Option E), offers one of the most suitable options for the location of a new sustainable settlement, subject to investment in the provision of a new railway station and related public transport improvements. Whilst Hixon has the potential to deliver a new settlement, albeit at a much smaller scale than Meecebrook, it is our view that a larger settlement such as that which could be accommodated at Meecebrook will in the longer term be the most sustainable option... A new settlement of this scale will generate sufficient housing provision and employment uses to justify significant infrastructure and transport improvements. Alongside this, it is our view that the site is the most sustainable in terms of its accessibility to the Black Country via both the mainline rail network (with the potential for a new railway station) and the M6 highway network."

The latest proposal is to deliver a scheme of ~6,000 homes, with ~3,000 homes delivered in the plan period up to 2040 (although this figure is associated with some uncertainty, and subject to review). However, it remains the case that allocation of Meecebrook could potentially go some way to ensuring that a proportion of unmet needs from nearby areas are met in Stafford Borough, including both unmet needs to 2040, which are well understood, and any unmet needs that might arise post 2040.

Having said this, there would also be good potential to provide for unmet needs under scenarios involving allocation of either **Hixon Airfield** and **Beacon Hill**. Even were SE Gnosall to be allocated, and not any of the other three sites, there

would still be the potential to provide for unmet needs, although it would be more challenging, given the extent of locally arising needs (see discussion in Section 5 of this report). Also, Gnosall is less well-linked to major conurbations to the north and south.

Aside from the matter of supporting a high growth strategy locally, with a view to setting the housing requirement at a figure above LHN (which might enable additional delivery of affordable housing locally, in addition to provision for a proportion of unmet needs) and / or providing for unmet needs, further considerations include:

- Housing mix – all sites are of the scale to deliver a good mix of required housing types and tenures, including different tenures of affordable housing to help meet the high need that exists locally. There are no firm proposals to deliver specialist housing or pitches / plots for Gypsies and travellers or travelling show people at the strategic development sites, but there would certainly be good potential to do so at Meecebrook (although current understanding is that this would not be necessary, given alternative available land to meet needs, as understood from the latest Gypsy and Travellers needs assessment).
- Delivery risk - there is a need to consider the risk of unanticipated delays to delivery. However, it is difficult to suggest this is a significant issue, because risk could be mitigated through the development strategy (including by ensuring a mixed portfolio of site allocations, and a large 'supply buffer' over-and-above the housing requirement) and because the NPPF puts in place measures to remedy unforeseen delivery issues, namely the presumption in favour of sustainable development. The scale of Meecebrook does indicate delivery risk over-and-above the other three sites, whilst Hixon Airfield is potentially associated with some challenges around transport infrastructure upgrades. Beacon Hill should benefit from taking the form of an urban extension, although recent / ongoing strategic urban extensions to Stafford have faced some delivery challenges. Gnosall is likely associated with the lowest delivery risk.
- Locally arising housing need – can be a consideration, but is not thought to be a significant consideration in this instance. For example, Gnosall has seen significant housing growth over recent years, as discussed in Section 5.4.

In **conclusion**, allocation of any strategic site is likely to give rise to an opportunity to set the local plan housing requirement at a figure above LHN and / or make provision for unmet needs. As such, positive effects are predicted under all four options, although the predicted benefits are less significant in the case of Gnosall.

Land, soil and natural resources

Meecebrook	Hixon Airfield	Beacon Hill	SE Gnosall
3	1	1	2

A foremost consideration here is the need to avoid the loss of agricultural land classed as 'best and most versatile' (BMV), which the NPPF defines as that which is grade 1 (highest quality), grade 2 or grade 3a. The nationally available agricultural land quality dataset shows significant variation in agricultural land quality across the borough; however, this dataset has low accuracy (it does not differentiate between grades 3a and 3b) and very low spatial resolution, such that it must be used with caution. Another dataset is available showing agricultural land quality with a much higher degree of resolution and accuracy, namely the "post 1988" dataset; however, this dataset is very patchy.

The national dataset serves to suggest a likelihood of **Meecebrook** being associated with significant areas of 'grade 2' land. One area of land within the site has been surveyed in detail, namely land associated with flooded gravel pits along the Meece Brook corridor, and been found to comprise 'grade 3a', aligning with the national dataset, which indicates 'grade 3'. However, an area of land nearby is shown by the national dataset to comprise 'grade 2', whilst the 'post 1988' dataset shows 'grade 3a'. Either way, it seems likely that Meecebrook comprises BMV land.

SE Gnosall is also likely to be associated with significant BMV agricultural land, with the national dataset showing the bulk of the site to be grade 2, although the site is also partly grade 3 and partly grade 4 (the stream valley). With regards to **Hixon Airfield** and **Stafford East**, the national dataset shows grade 3 quality land, but it is also noted that there is grade 4 quality land nearby, such that it could prove to be the case that further investigation finds some 'non-BMV' land.

A further consideration is the need to avoid sterilisation of minerals resources that could potentially be viably extracted, with all four of the sites intersecting a Minerals Safeguarding Area, as understood from the policies map of the Staffordshire Minerals Local Plan (2017), which reflects the association of all the sites with river / stream corridors. However, it is also important to note that safeguarding is not absolute, as explained by the Minerals Safeguarding Practice Guidance (Mineral Products Association and the Planning Officers' Society; 2019): *"Allocation of sites for non-minerals development within MSAs and proximate to safeguarded minerals infrastructure sites should be avoided where possible… However, safeguarding is not absolute. Where other considerations indicate that a proposed site allocation*

within an MSA is appropriate, or the allocation for development is of overriding importance to safeguarding, mitigation measures to reduce the area and amount of resource sterilised should be considered."

Finally, with regards to waste management, the policies map of the Staffordshire and Stoke-on-Trent Joint Waste Local Plan (2012) serves to highlight organic treatment facilities in close proximity to both Meecebrook and SE Gnosall. However, there is no reason to suggest any significant concern. In terms of on-site sustainable waste management, large scale strategic schemes can tend to give rise to a good opportunity (e.g. waste minimisation, sorting, storage, collection), and can also feasibly give rise to opportunities in respect of 'sustainable construction' processes aimed at minimising waste (across the full building lifecycle), but it is difficult to suggest that this is a significant consideration.

In **conclusion**, it is fair to highlight that Meecebrook would likely lead to significant loss of BMV agricultural land, as would Gnosall, albeit significantly less.

Landscape

Meecebrook	Hixon Airfield	Beacon Hill	SE Gnosall
3	1	4	2

A range of landscape sensitivities associated with the four sites have already been discussed above, under the biodiversity and historic environment headings. Key considerations include:

- **Meecebrook** – a study was completed in 2021 to evaluate landscape sensitivity, which concluded 'medium' sensitivity overall. However, the study examined the site previously under consideration for 11,500 homes, to include the MOD land, which has relatively low landscape sensitivity. Most of the land examined in 2021 that falls within the current site boundary was found to have 'medium / high' sensitivity overall.

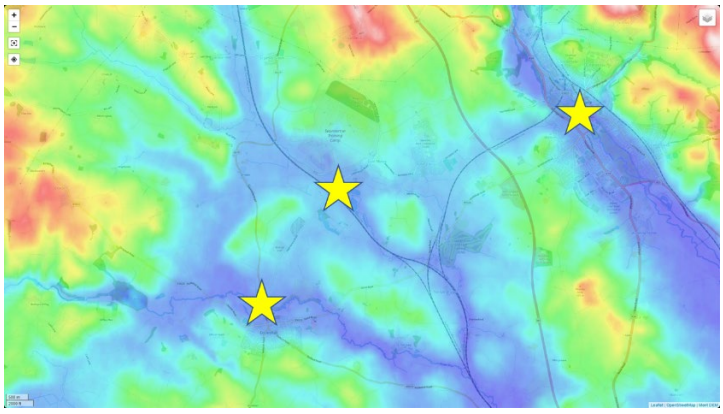
  The work in 2021 identified greatest concern in respect of raised land in the vicinity of Upper Heamies, where there are long distance views from the Stone Circles Challenge long distance footpath. However, land here is no longer included within the site boundary.

  With regards to the western part of the site – i.e. land to the west of the West Coast Main Lline – the 2021 study examined part of this area, and concluded medium / high sensitivity. There is a low density of lanes and PROWs in this area, and so presumably limited sensitive views and limited appreciation of the landscape. However, there are clearly some sensitivities, for example appreciation of the rural landscape from High Lanes.

  A further important consideration is the potential for defensible boundaries to guard against future 'sprawl' (although there are also arguments for enabling settlements to grow organically over time). In this respect, there is something of a mixed picture: overall, the site could be described as fairly centred on the Meece Brook valley (in a similar fashion to Eccleshall's association with the River Sow, and Stone's association with the River Trent); and, in several directions, there is the potential to draw upon landform, infrastructure, the Green Belt or other features in the landscape to contain a settlement; however, in certain directions there is potentially a concern regarding development creep, most notably along the Swynnerton Road, which follows something of a valley. It would be important to ensure no encroachment on the River Sow corridor, to the north of Eccleshall, which is highly sensitive, including given the presence of Eccleshall Castle. The potential for Meecebrook to fund / facilitate enhancements might be explored.

  The figure below, which is a screenshot taken from https://en-gb.topographic-map.com/maps/b9/England/, shows topography in the area, highlighting the location of Eccleshall, Meecebrook and Stone.

  Topography in the area (from https://en-gb.topographic-map.com/maps/b9/England/)



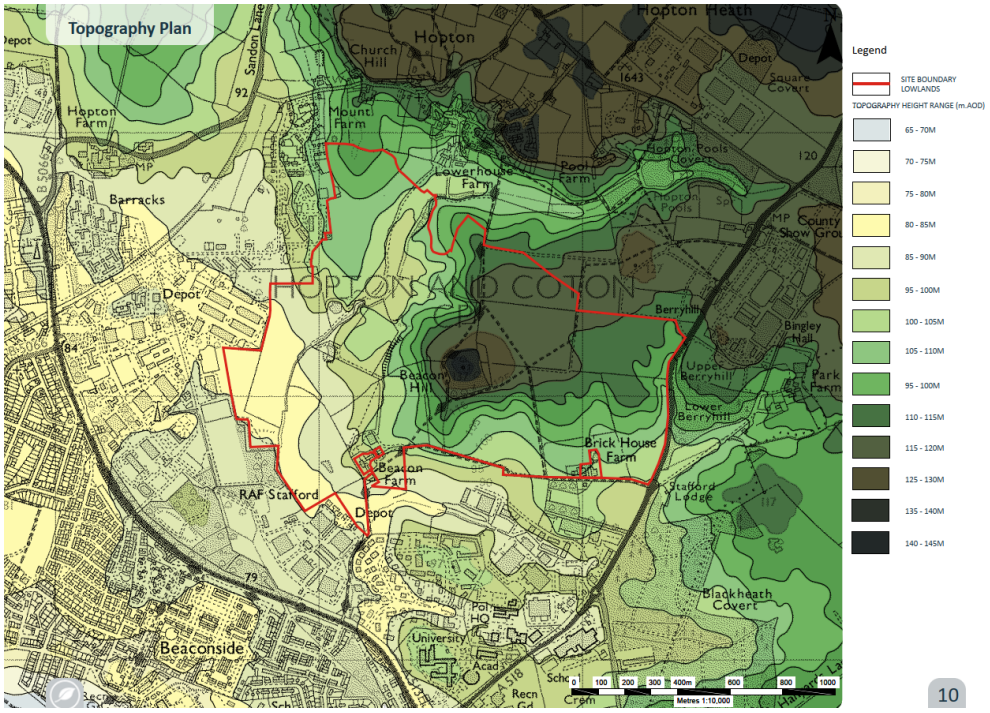
- **Hixon Airfield** – is notably low-lying land (somewhat unusual for an airfield) and the landscape assessment completed in 2021 concluded: *"The site has low landscape value and low sensitivity to development. The dismantled railway to the north, railway to the west, Stowe Lane to the east and the Airfield Industrial Estate to the south provide defensible boundaries and a high level of potential containment."*
- **Beacon Hill** – has not been examined in detail, unlike the other three sites, but is considered likely to have relatively high landscape sensitivity, potentially broadly on a par with Meecebrook. Whilst the settlement edge at the northeast extent of Stafford is clearly heavily influenced by the extensive MOD, employment and education uses, Beacon Hill is likely to be a valued landscape feature, both in-and-of-itself and as a stepping-stone between Stafford and valued landscapes to the east, via the Two Saints Way long distance footpath. A further consideration is extensive views across the site from the A518, with Beacon Hill clearly visible, as well as the farmhouse at Brick Hill Farm. Hopton and Coton Parish Council (PC) commented through the Issues and Options consultation (2020):

  "On a tongue of Triassic Limestone this hill can be seen for miles. On top, around a Triassic Sandstone outcrop, is Beacon Hill Wood. From this hill there are wide views across Stafford and Staffordshire. It is only a short walk from Beaconside but Beacon Hill Wood is a wonderfully wild and natural place away from the noise and bustle of the town below. Views to the north include Hopton Village, the site of the old and new churches below Church Hill and, further round, the site of the Battle of Hopton Heath. As a place for a beacon it is ideal. Just east of the wood five rights of way meet indicating the historic importance of this area."

  The latest vision document received from the site promoter includes a focus on addressing landscape issues. There is a particular focus on Beacon Hill; however, there is also a need to consider the Kingston Brook corridor as a green / blue infrastructure asset, linking to Hopton Pools. The figure below is taken from the vision document.

  With regards to securing containment and minimising the risk of 'sprawl', the Beacon Hill proposal is supported, given the route of HS2 and the proposal to buffer the new rail line with a significant new country park, plus there is containment to the west on account of MOD Stafford. There is a clear argument for containing the expansion of Stafford within the valley of the River Sow.

  Topography in the vicinity of Beacon Hill



10

- **SE Gnosall** – the study completed in 2021 concluded medium–medium / high sensitivity, but the site examined was considerably larger than that now under consideration, including raised land to the north of the A518. The land gently descends, away from Gnosall towards the Doley Brook corridor, which in some ways helps to ensure limited landscape sensitivity, but also possibly gives rise to a concern regarding future development creep / sprawl. A narrow stream corridor / surface water flood zone (a field boundary) would assist with containment, and there are also landscape features to the south (including an anaerobic digester) that could dissuade further expansion, but there could still be a degree of risk. There is also the question of whether a 1,000 home scheme to the SE of Gnosall could set a precedent for further expansion of the village to the east, e.g. a scheme along the lines of that which was presented as an option at the Issues and Options stage.

In **conclusion**, allocation of Hixon Airfield is strongly supported, from a landscape perspective, and it is appropriate to predict positive effects on the baseline, on the assumption that allocation would serve to limit pressure on more sensitive locations. It is difficult to differentiate between the other sites. However, on balance, it is considered appropriate to flag a concern with Meecebrook and Beacon Hill over-and-above Gnosall. It is also judged appropriate to flag a risk of 'moderate or uncertain' significant negative effects under Meecebrook and Beacon Hill. However, this is marginal, on the basis that strategic allocation would serve to limit pressure on other locations that are sensitive in landscape terms. Furthermore, as strategic sites there would be excellent potential to avoid and mitigate concerns through masterplanning, and this is particularly the case for Meecebrook.

Transportation

Meecebrook	Hixon Airfield	Stafford East	SE Gnosall
?	?	?	?

As an initial point, there is merit to favouring large mixed use schemes that will tend to support or enable:

- a degree of self-containment, i.e. a situation whereby residents' need to travel beyond the local area is minimised and, in turn, high rates of walking and cycling;
- good access to high quality transport infrastructure (with capacity), in particular public transport infrastructure, such that longer trips (in particular commuting trips at peak times) can be made in such a way that minimises per capita greenhouse gas emissions and traffic congestion (with associated pollution and impacts to economic productivity);
- Masterplanning best practice, including strategic planning for mobility hubs and high quality active travel infrastructure within the site (although there are masterplanning challenges to consider, with a risk of peripheral parts of the site not linking suitably well to the centre); and
- 'Future mobility' interventions / solutions, including those discussed as potentially feasible and achievable, in the context of Meecebrook, within the current Meecebrook Transport Strategy (2022).

In light of these points, **Meecebrook** is supported on account of its scale and ambition. Also, there is a headline locational opportunity, in that there is the potential to deliver a new train station on the West Coast Mainline. Confirmation of delivery remains some way off, but a feasibility assessment has been completed that indicates: once fully built there is a prospect of station revenue generating a 'medium' level of value for money; there is a 'reasonable' prospect of achieving a train frequency of two trains per hour; and several locations within the site boundary are viable in engineering terms, with at least one with levels of cost estimated to represent 'medium' level value for money.

With regards to viability, there is also a need to take account of the costs of wider transport infrastructure upgrades, including road connectivity to the strategic road network. The new proposed site is notably located between strategic road corridors, such that there will be a need to ensure good links, and the possibility of having to bridge over one or both of the M6 and HS2 corridors might be envisaged. The possibility of new link / relief roads to improve the functioning of the current network has been suggested, albeit in the context of a 11,500 home scheme.

Should it be the case that delivery of a train station cannot be guaranteed, then the transport merits of the site decrease significantly. Staffordshire County Council stated clearly through the Issues and Options consultation (2020): *"A new Garden Community at Meecebrook would require a new rail station to prevent it from becoming a car dominated settlement."* However, this statement was made in the context of an assumed 11,500 home scheme.

Without a train station there would still be good potential to deliver a high quality bus service, linking to Stafford, Stoke-on-Trent and Stone. However, the question arises as to whether one or more high quality (i.e. fast and frequent) bus services could effectively link Stoke-on-Trent and Stafford via both Meecebrook and Stone. This is a detailed question for the County Council and the bus companies.

There would also be a need to carefully consider traffic flows, including noting that the new red line boundary, since the Issues and Options stage is further from the M6 corridor and closer to the A5013. There would be a clear need to consider traffic flows through Eccleshall, and there are likely to be other sensitive / hotspot roads and junctions.

With regards to the other three sites:

- **Hixon Airfield** – access is hampered by the railway line to the west and the Amerton Brook corridor to the north. The current proposal is for access to / from the south and east, which is not ideal from a perspective of ensuring good connectivity to Stafford, and supporting an enhanced bus service (Hixon's current service is at best hourly). The possibility of a new bus service via Great Haywood, where there is a GP surgery, has been suggested; however, this would be a circular route, potentially via three A-road corridors, and therefore somewhat complex.

- **Beacon Hill** – performs relatively well in a number of respects as it would take the form of a strategic urban extension to the borough's main town. However, road access would be to / from the east, as opposed to the south / southwest, which is that part of the site closest to the Stafford urban edge. The eastern part of the site, which would potentially see a focus of growth (e.g. higher densities), on account of highest accessibility by road, would be over 3km distant from Stafford town centre, and is also a part of the site likely to be more sensitive in landscape terms. It would be important to explore options for securing walking and cycling connectivity to / from the south of the site; however, there are clear challenges in this respect, given MOD and employment land.
- **SE Gnosall** – benefits from good access onto the A518, along which there is a half-hourly bus service, and bus patronage is understood to be high, such that the possibility of improving the bus service to 15 minute frequency at peak times has been suggested, albeit in the context of a larger scale development. It is also important to note that there is potential to commute to Stafford (and Newport) via an (unlit) off-road cycle route. However, despite good access to non-car modes of travel, there would nonetheless likely be a level of car dependency over-and-above the other three sites. The A518 corridor, between Stafford and Newport, is not known to be a particular traffic congestion hotspot, and the Stafford Western Access Route has recently opened, improving connectivity from the A518 corridor; however journeys from Gnosall to Stone and Stoke-on-Trent might be via more minor roads, including via Eccleshall. There is also a need to consider traffic through Haughton, which is between Gnosall and Stafford on the A518 corridor, as well as 'rat-running' through small villages to the south. In short, it is important to note that Gnosall is distant from north-south routes on the strategic road network.

In **conclusion**, it is challenging to reach overall conclusions ahead of transport modelling and detailed site specific proposals / evidence, plus there can be a tension between objectives relating to minimising greenhouse gas emissions and minimising traffic congestion. A primary consideration is confirming transport infrastructure upgrade proposals for Meecebrook, and the likelihood of delivering a new train station in particular. There is an argument for highlighting SE Gnosall as the preferable option, as there is relative clarity in respect of the ability to achieve good access onto the strategic road network (and, specifically, a section of the network not known to be associated with any particular traffic congestion issues) and there is a clear strategy in respect of supporting modal shift away from the private car. However, on balance, it is considered appropriate to highlight uncertainty under all options, at this stage in the process.

Water

Meecebrook	Hixon Airfield	Stafford East	SE Gnosall
1	3	2	2

Strategic sites can lead to an opportunity, in respect of minimising the impacts of growth, both in terms of water resources and water quality, and early work has been completed for Meecebrook, highlighting the potential to take an 'integrated' approach to water management. An 'integrated' approach involves giving coordinated consideration to:

- Sourcing water – typically abstraction from an aquifer, but also rainwater harvesting and wastewater reclamation. Focusing on Meecebrook, there has been early engagement with the water company (Severn Trent Water Limited), who manage the North Stafford Water Resource Zone, and it is understood that no major concerns have been raised to date. However, the water company cannot currently confirm specific details of any new local sources of water that could be used to supply Meecebrook as this will be determined during the next Water Resource Management Plan review, the programme for which is currently uncertain. The Plan will consider there is a future overall supply/demand deficit or surplus in the water resource zone, and would need to weigh up the extra costs involved with constructing long distance new distributing watermains (including storage facilities, pumping stations etc.) to supply Meecebrook against the implications of deploying new local water sources.
- Managing demand – an ambitious target is 85 l/p/d. There is reason to suggest that large strategic sites give rise to a particular opportunity to achieve this; however, there is much uncertainty ahead of further work including viability.
- Recharging groundwater – strategic sites, and large strategic sites in particular certainly give rise to an opportunity in respect of careful planning of high quality Sustainable Drainage Systems (SuDS), which can deliver wide-ranging benefits, including groundwater recharging. There is reason to suggest that Meecebrook represents a particular opportunity, including given its close association with the Meece Brook.

- Wastewater treatment – is typically a key issue. Capacity at existing treatment works can often be increased to accommodate increased flows (at least hydraulic capacity of the works; biological and chemical capacity of the receiving water course to accept an increase in treated water can prove more challenging). However, there are major cost implications, and a risk of unforeseen issues and delays. As such, there is merit to directing growth to locations with existing capacity and/or where growth could support delivery of a new treatment works. Early work for Meecebrook is encouraging, as the scale and location of the scheme could potentially support an onsite treatment works, plus there are three existing treatment works that could potentially accommodate some wastewater flows from Meecebrook, e.g. during the early phases of growth. A new treatment works would provide an opportunity for best practice, e.g. integrating with new wetland habitat to buffer the receiving water course (the Meece Brook). However, at this early stage there is much uncertainty regarding what is achievable land what would prove viable in practice.
- Discharge – flows of treated water to water bodies can assist with avoiding low flows (e.g. during times of drought, which can lead to major impacts on water ecosystems), albeit there is also a need to consider the implications of increased flows of treated wastewater for water chemistry and biology (particularly during times of low flow). There is no reason to suggest that Meecebrook represents a particular opportunity, but this could be explored further in detail, under the umbrella of exploring an integrated approach to management of water resources and water quality.

In short, there are reasons to suggest that directing growth to Meecebrook could lead to an opportunity, largely on account of the scale and the potential for a high level of 'sustainability ambition'; however, there is a need for caution because the level of available evidence is skewed towards Meecebrook.

With regards to **Hixon Airfield**, an initial assessment completed by Severn Trent Water in 2021 concluded that this is a 'medium risk' area, but the reasons for this are not entirely clear. It may be that the aquifer to the east of Stafford has relatively limited potential to support further extraction, but this is currently unceratain.

With regards to wastewater treatment, it seems that there would likely be a need for some pumping of water in order to reach the Hixon STW, but this is typically achievable and viable. With regards to the treatment works itself, it seems to be the case that there is hydrological capacity (such that there can be relative confidence that development would not lead to capacity breaches and the release of untreated sewage), but potentially issues with the capacity of the receiving watercourse to receive further treated water, because of poor performance against Water Framework Directive (WFD) objectives (see discussion of the 'Trent from Tittensor to River Sow' waterbody here). Importantly, the STW appears to drain to the River Trent downstream of Pasturfields SAC.

With regards to **SE Gnosall**, the study completed in 2021 concluded 'low' concerns, whilst work has not been completed for **Beacon Hill**.

Further evidence comes from the detailed consultation responses received from Severn Trent Water through the Issues and Options consultation in 2020, for example:

> *"Whilst lacking specific locations and detail, generally speaking; string settlement clusters and wheel settlement clusters are unfavourable. This is because although they appear to be individual and separate settlements more often their infrastructure is a single system..."*
>
> *"Urban extensions and intensification around the edge of larger settlements allows us to focus our efforts on a specific region. Larger settlements often have some capacity which can be released by implementing long term strategic aspirations and can help us reshape our existing systems for the better. Occasionally they do involve some major engineering challenges and therefore close collaboration is encouraged to ensure there is no delay to implementing enabling infrastructure."*
>
> *"New garden communities often require extensive amounts of new infrastructure and can pose major strategic challenges. That being said they also provide great opportunities to arrange infrastructure in an idealised way and with close collaboration on master planning and delivery they can be great ways to implement innovative systems."*

In **conclusion**, Meecebrook potentially represents an opportunity, largely on account of its scale, albeit there is a degree of uncertainty at this stage. There are potentially some concerns in respect of Hixon Airfield, but this is highly uncertain at this stage. Further comments on the competing strategic site options from the water company would be welcomed.

Appraisal summary

The table below provides a high-level overview of the appraisal presented above. Within each row (i.e. for each of the topics that comprise the SA framework – see Section 3) the columns to the right hand side seek to both rank the scenarios in order of performance (where a rank of one indicates best performing) and categorise the performance of each scenario in terms of 'significant effects' using red / amber / light green / green.[33]

Topic	Meecebrook	Hixon Airfield	Beacon Hill	SE Gnosall
Air and wider env quality	2	3	1	3
Biodiversity	2	3	2	1
Climate change adaptation	=	=	=	=
Climate change mitigation	1	2	2	3
Communities	1	2	2	3
Economy and employment	1	2	3	4
Health and wellbeing	1	2	2	2
Historic environment	2	1	1	3
Housing	1	2	2	3
Land, soil and natural resources	3	1	1	2
Landscape	3	1	4	2
Transport	?	?	?	?
Water	1	3	2	2

Discussion

The appraisal serves to highlight a mixed picture, with all options associated with pros and cons. It is certainly not possible to place the options in an overall order of preference purely on the basis of this appraisal, recognising that the sustainability topics are not assumed to have equal weight.

For example, and notably, whilst SE Gnosall stands-out as performing poorly (both in an absolute and a relative sense) in terms of more objectives than any of the other options, and performing well in terms of the least number of objectives, it does not automatically follow that this option is 'least sustainable' overall. This is because it is judged to perform best in terms of 'biodiversity' objectives, which the Council – as decision-makers – might choose to assign particular weight in the overall planning balance. Also, there are certain transport arguments in favour of growth at SE Gnosall, and the site benefits from being in public sector ownership, potentially supportive of development viability.

[33] **Red** indicates a significant negative effect; **amber** a negative effect of limited or uncertain significance; **light green** a positive effect of limited or uncertain significance; and **green** a significant positive effect. No colour indicates a neutral effect.

With regards to the other three sites:

- **Meecebrook** – represents a major opportunity from a housing perspective (because there would be clear potential to set the housing requirement at a figure significantly above LHN, to reflect locally arising needs and/or unmet needs) and from a 'communities' perspective (because of the potential to deliver a new garden community, to include a new secondary school). It also represents a notable opportunity from an 'economy and employment' perspective (because of the potential to deliver significant new employment land) and from a 'water' perspective (because of good potential to deliver an 'integrated' approach to water management). There is also likely to be an opportunity to minimise per capita greenhouse gas emissions from the built environment, relative to the other sites under consideration, and the site is *fairly* unconstrained in biodiversity and historic environment terms.

  However, there is a need for further work to confirm precisely what is achievable and viable, e.g. given the likely need for costly road infrastructure upgrades, and there is a particular need to confirm that a train station will be delivered. Without a train station then the 'transport' merits of a 6,000 home scheme in this location are questionable, as links to higher order settlements would be far less strong (also an unmet needs consideration). Also, there are potentially significant landscape constraints (albeit the site broadly benefits from association with the valley of the Meece Brook), and development would likely lead to the loss of significant grade 2 agricultural land. Finally, there are a range of constraints within the site, including the railway / river corridor and a high pressure gas pipeline, that create challenges for effective masterplanning, from a perspective of ensuring a cohesive community and ease of movement.

- **Hixon Airfield** – performs well in 'housing' terms, as per Meecebrook, in that there should be good potential to deliver a high rate of affordable housing; however, this has not been examined through a viability study (unlike Meecebrook, where the viability study finds that the potential to deliver 40% affordable housing remains somewhat uncertain). Also, in terms of meeting and unmet housing needs, the site is less well linked to the constrained urban areas to the north and south (on the assumption that Meecebrook can deliver a train station and a good bus service).

  The site is quite strongly supported for a 'landscape' perspective, is subject to limited historic environment constraint and is not likely to comprise significant best and most versatile agricultural land. Also, the proposal is to deliver an extension to an existing strategic employment area as well as 5.6 ha of "community and retail" (in addition to a primary school), such that benefits to the wider village can be envisaged (e.g. there is currently no GP surgery in the village).

  However, there is significant biodiversity constraint, due to the proximity of internationally designated sites (although the potential for onsite and nearby strategic biodiversity enhancements can be envisaged) and there are also thought to be significant constraints affecting Hixon wastewater treatment works. There are also uncertainties in respect of connectivity to the strategic road network and the potential to support a high quality bus service, and there is a risk of problematic traffic through Hixon and Weston. Finally, given that the proposed scale of development is a third of Meecebrook, there could be decarbonisation opportunities missed.

- **Beacon Hill** – performs well in 'housing' terms as per Hixon Airfield, in that there should be the potential to deliver a good rate of affordable housing, but this has not been examined through a viability study (and it is noted that viability is more challenging in Stafford than elsewhere in the borough).

  The site benefits from good connectivity to Stafford town centre and the current proposal is to make significant land available for a secondary school and a country park. However, equally there are currently no primary schools shown on the concept masterplan, and the site promoter has confirmed there is a need for further work to confirm how best to make provision for educational needs within the site. Importantly, the site is within walking distance of Weston Road Academy, unlike Hixon Airfield (where students would need to be bussed to school, which could lead to challenges, as expansion could reduce space available for bus parking / pick-up); however, the walk to school would seemingly necessitate passing through Beacon Business Park. More generally, the presence of both the business park and MOD land is a major barrier to connectivity between the site and Stafford.

  The site will benefit from good containment, in landscape terms (as would Hixon Airfield), given the route of HS2. However, landscape is nonetheless a key constraint, given the prominence of Beacon Hill and topography across the wider site. The land is crossed by a long distance footpath that links Stafford to high quality countryside to the east, and there are extensive views across the site from the A518. There is also a need to consider the strategic green / blue infrastructure role of the Kingston Brook.

  Finally, there is a need to note that, should the proposal to deliver a new secondary school fall away (e.g. following discussions with the County Council), there would be a need to ensure that the site delivers no more than 2,000 homes, due to secondary school capacity in Stafford (specifically, the potential for expansion at Weston Road Academy). This is also the case for Hixon Airfield. For both sites, this cap on the number of homes that can be accommodated could lead to implications for what can be delivered by way of infrastructure upgrades without impacting development viability and, in turn, the potential to deliver affordable housing and other 'policy asks'.

Appendix V: Site options GIS analysis

Introduction

As discussed in Section 5.3, as a relatively minor step in the process of arriving at reasonable growth scenarios (see Figure 5.1) all site options were subjected to GIS analysis. The outcome of the analysis is in the form of a large spreadsheet of data, with a row for each site options that progressed to Stage 4 of the SBC-led site selection process and around 50 columns that present information on the site (e.g. size and proposed use), performance data (e.g. distance to a SSSI) and supplementary attribute information (e.g. name of the nearest SSSI).

This analysis fed-into work to define reasonable growth scenarios in 2022, and the aim of this section is to present summary insights into the **spreadsheet**, considering the data both:

- within each **column** of the spreadsheet – i.e. information on the spread of data for each performance measure, including site options that stand-out as performing notably well / poorly, and the relative performance of sub-sets of site options (e.g. those taken forward for allocation, versus those rejected at Stage 4); and
- across each **row** of the spreadsheet – i.e. considering how each site option performs, albeit it is not possible to reach an overall conclusion on performance, because the individual performance criteria are not weighted (nor is it fair to assume that they all have equal weight / importance in the decision-making process).

Limitations

GIS analysis of the spatial relationship between site options and various push (e.g. historic environment designations) and pull (e.g. schools) features cannot be considered sophisticated analysis. GIS analysis of site options:

- rarely highlights site-specific issues / opportunities that are not otherwise be readily apparent to the specialist; and
- highlights issues / opportunities that are 'theoretical', and which can often be discounted, or assigned limited weight in decision-making, upon closer inspection. For example, where a site is distant from accessible greenspace this can be addressed by delivery of new accessible greenspace onsite.

As such, GIS analysis of site options should not be overly relied upon, at the expense of a focus on qualitative analysis informed by wide ranging evidence, including the views of stakeholders, and professional judgement.

The analysis should certainly not be used as a primary means for arriving at overall conclusions on site options. Any attempt to utilise the analysis in this way would necessitate a process of Multi Criteria Analysis (MCA) whereby a degree of importance is assigned to each of the performance metrics, and this process is fraught with challenges.

Structure of this appendix

Set out below is:

- further discussion of **methodology**;
- analysis outcomes by performance metric (i.e. each **column** in the spreadsheet)
- analysis outcomes by site option (i.e. each **row** in the spreadsheet)

Methodology

The first step was to gather GIS data.

- Site options – the Council provided 'red line boundaries' for all site options. One of the issues / limitations is that land-owners sometimes submit multiple overlapping sites over time. Another challenge is that large land-holdings sometimes get submitted, within which might be contained realistic site options.
- Constraint / push and opportunity / pull features - much data is available nationally ('open source') and range of other data is held by the Council, including as shown on the Plan for Stafford Borough 2011-2031 Interactive Policies Map. However, there are a range of potential issues to be mindful of, including data becoming out of date, only being available for certain parts of the borough or not being available for neighbouring local authority areas.

The second step was then to run the analysis, i.e. query the spatial relationship between each site option and each push / pull feature (e.g. distance to a listed building, intersect with a flood zone). There are two points to note:

- Distance was measured “as the crow flies” (it can also be possible to calculate distance by road, footpath etc).
- Distance was calculated from the nearest point of each site option (there can also be arguments to calculate distance from the centre point, or from known or likely access points).

Having generated the spreadsheet of data, the third and final step was then to interrogate, utilise and report the data.

Analysis outcomes by metric

The aim here is to present insights into trends across the data for a range of key metrics and summarise the approach taken to categorising / differentiating the performance of site options on a red-amber-light green-green (RAG) scale.

Air quality management area (AQMA)

The site options closest to an AQMA is over 500m distant, and this site (located in Swynnerton Parish) was rejected at Stage 4. The next closest site option is over 2km distant, at which distance there is little reason to assume (without the benefit of traffic modelling) that development would risk increased traffic through the AQMA. As such, there is no column for ‘AQMA’ within the table below.

Special Area of Conservation (SAC)

There is an established 15km buffer zone for Cannock Chase SAC, within which there is a requirement for development to contribute towards mitigating recreational pressure. However, there are also two further SACs locally, that are closer to many site options than Cannock Chase, and these are not associated with well-established buffer zones.

As such, it is important to categorise performance on the basis of the spread of data (with a view to differentiating on the basis of relative performance) as-much-if-not-more-so than on the basis of absolute thresholds.

On balance, it is considered appropriate to:

- assign **red** to the 33 sites within 2,000m;
- assign **green** to 52 sites beyond 10km as green;[34] and
- place the remaining 63 sites on a **colour scale** (from light red to light green) according to relative performance.

Other points to note, with regards to the spread of data, include:

- Of the eight sites closest to an SAC, all were rejected at Stage 4, bar one shortlisted (not allocated) employment site.
- The preferred options are 9,182m distant on average, whilst shortlisted are 4,500m and rejected 7,926m.
- The data potentially serves to suggest that Pasturefields Saltmarsh SAC has greatest potential to come under pressure, particularly if sites in proximity that are currently shortlisted become allocations ahead of plan finalisation.
- In particular shortlisted site options at Hixon are in relatively close proximity to Pasturefields SAC. Also, shortlisted site options at Walton-on-the-Hill, Stafford are in relatively close proximity to Cannock Chase SAC.

Ramsar

Fewer site options are in proximity to a Ramsar site than is the case for SACs. As such, it is considered appropriate to adjust the approach to categorising performance, as follows:

- assign **red** to the 15 sites within 2,500m;
- assign **green** to 29 sites beyond 10km as green; and
- place the remaining 104 sites on a **colour scale** (as above).

Other points to note, with regards to the spread of data, include:

- Most sites assigned red were rejected at Stage 4, but three sites assigned red are shortlisted and taken forward do the reasonable alternative growth scenarios stage (but not allocated). These are all located at Hixon.
- The preferred options are 7,309m distant on average, whilst shortlisted are 5,927m and rejected 6,726m.

[34] It is recognised that 15km is an important established buffer zone for the Cannock Chase SAC. However, only five site options are located outside of this buffer zone, all of which were rejected at Stage 4 of the SBC Officer-led site selection process, such that they are not reasonably in contention for allocation. On this basis, it was considered appropriate to use 10km as a threshold distance, with a view to effectively differentiating between the performance of the site options reasonably in contention for allocation.

Site of Special Scientific Interest (SSSI)

As an initial point, it is important to note that all sites designated as SAC or Ramsar are also designated as SSSI.

Again, it is very difficult to identify effective distance thresholds. 400m is a well-established threshold for recreational pressure (e.g. dog walkers), which is an important consideration for many SSSIs (but not all), but there are a range of other 'impact pathways' (e.g. hydrological), plus recreational pressure can come from much further afield. Natural England has defined 'impact risk zones' for all SSSIs, but these are very extensive, such that they capture many site options and, in turn, can fail to enable effective differentiation between site options.

On balance, it is considered appropriate to:

- assign **red** to the 29 sites within 1km;
- assign **green** to 31 sites beyond 4km as green; and
- place the remaining 88 sites on a **colour scale**.

Other points to note, with regards to the spread of data, include:

- Stand-out sites are: Stafford Gateway, which is a preferred option located adjacent to Doxey and Tillington Marshes SSSI, and TIX02, which is a shortlisted site located 70m from Baswich Meadows SSSI.
- The preferred options are 3,055m distant on average, whilst shortlisted are 1,986m and rejected 2,577m.

Other metrics

Having introduced the broad approach, the table below summarises the RAG-shading approach taken to all 21 performance metrics assigned a column within the table below (N.B. performance was also measured for a range of other metrics, but the outcome of the analysis is of less importance to the task of differentiating site options).

It is important to reiterate that the aim is not to appraise significant effects, but rather simply to differentiate the relative performance of site options, with a view to contributing to the task of arriving at reasonable alternatives for appraisal.

Metric	Red	Light red	Light green	Dark green
Special Area of Conservation (SAC)	<2,000m	Colour scale for sites 2,000m-10,000m		>10,000m
Ramsar	<2,500m	Colour scale for sites 2,500m-10,000m		>10,000m
Site of Special Scientific Interest (SSSI)	<1,000m	Colour scale for sites 1,000m-4,000m		>4,000m
Site of Biological Importance (SBI)	<100m	Colour scale for sites 100m-1,000m		>1,000m
Priority habitat	Intersect	<10m		Other sites
Cannock Chase AONB	<2,000m	Colour scale for sites 2,000m-5,000m		>5,000m
Green Belt	Intersect	Partial intersect		Other sites
Agricultural land	Intersect grade 2	Intersect grade 3		Other sites
Flood zone	Intersect zone 3	Intersect zone 2		Other sites
Conservation area	<50m	Colour scale for sites 50m-1,000m		>1,000m
Grade 1 listed building[35]	-	Colour scale for sites 129m-1,000m		>1,000m
Grade 2* listed building	<100m	Colour scale for sites 100m-1,000m		>1,000m
Grade 2 listed building	<50m	Colour scale for sites 50m-250m		>250m
Registered historic park/garden (RPG)	<500m	Colour scale for sites 500m-2,000m		>2,000m
Scheduled monument	<500m	Colour scale for sites 500m-1,000m		>1,000m
Town centre	>5,000m	Colour scale for sites 5,000m-2,000m		<2,000m
Neighbourhood centre	>2,000m	Colour scale for sites 2,000m-500m		<500m
Recognised Industrial Estate (RIE)	>5,000m	Colour scale for sites 5,000m-2,000m		<2,000m
Protected Employment Land (PEL)	>5,000m	Colour scale for sites 5,000m-2,000m		<2,000m
Local Green Space	>2,000m	Colour scale for sites 2,000m-500m		<500m
Index of Multiple Deprivation (IMD)	Light red (relatively affluent) to light green (relatively deprived) colour scale			

[35] The site option closest to a grade 1 listed building is 149 distant.

Analysis outcomes by site option

The table below includes a row for each of the site options subjected to analysis. The aim is to provide an insight as to the performance of each site in respect of the metrics discussed above.

It is important reiterate that: the aim is not to predict significant effects, but rather simply to differentiate the relative performance of site options; and the criteria are not assigned any weight, nor is it fair to assume equal weight.

Structure of the table

Sites are grouped by status and then by reference / location.

The status categories are as follows:

Status	Preferred option?	Variable across growth scenarios?	Progressed beyond Stage 4?	Rejected at Stage 4?	Other
1	Yes		Yes		
2	Yes		Yes		No supply assumed
3	Yes		Yes		Gypsy/Traveller
4	Yes		Yes		Employment
5	Yes	Yes	Yes		Strategic (Meecebrook)
6	Yes	Yes	Yes		Employment (CRE02)
7		Yes	Yes		Strategic
8		Yes	Yes		
9			Yes		
10			Yes		Employment
11				Yes	

Where:

- “Preferred option” – means that it is a site that is a proposed allocation in the current ‘Preferred Options’ consultation document, and hence is considered via the appraisal presented in Section 9 of this report.
- “Variable across the growth scenarios” – means that it is a site that is a focus of the appraisal of reasonable alternative growth scenarios presented in Section 6 of this report.
- “Progressed beyond Stage 4” – means that it is a site that progressed beyond Stage 4 of the SBC Officer-led site selection process, and so is a focus of discussion in Section 5.4 of this report.
- “Rejected at Stage 4” – means that it is a site that was rejected at Stage 4 of the SBC Officer-led site selection process, and so is considered only within this current appendix, which links to Section 5.3.
- “Strategic” – means that it is a site that is subjected to appraisal in Appendix IV of this report.

Summary of site options GIS analysis

Status	Ref.	Area	SAC	Ramsar	SSSI	SBI	Priority habitat	AONB	Green Belt	Agricultural land	Flood risk	Conservation area	G1 listed building	G2* listed building	G2 listed building	RPG	Scheduled monument	Town centre	Neighbourhood centre	REI	PEL	Local Green Space	IMD
1. Preferred option (PO)	GNO02	0.3																					
	GNO04 (West)	5.6																					
	HIG07	0.1																					
	HIG10	1.2																					
	HIG11	0.2																					
	HIG13	4.9																					
	Site 07	0.2																					
	Stafford Station Gateway	37.4																					
	STAFMB03	12.8																					
	STAFMB12	0.3																					
	STO05	0.7																					
	STO07	4.8																					
	STO08 & STO10	0.8																					
	STO09	0.1																					
	STO13	6.3																					
	STO16	4.6																					
2. PO (no assumed supply)	HOP03	3.4																					
	HOP08	16.2																					
3. PO (Gypsy/Traveller)	HOP11	1.0																					
	GAY02	0.4																					
4. PO (employment)	SEI01	5.6																					
5. PO & variable	Meecebrook	530																					

Status	Ref.	Area	SAC	Ramsar	SSSI	SBI	Priority habitat	AONB	Green Belt	Agricultural land	Flood risk	Conservation area	G1 listed building	G2* listed building	G2 listed building	RPG	Scheduled monument	Town centre	Neighbourhood centre	REI	PEL	Local Green Space	IMD
6. PO & variable (employment)	CRE02	31.3																					
7. Variable (strategic)	HIX07	90.9																					
	HOP02	6.4																					
	HOP04	46.3																					
	HOP05	63.0																					
	HOP09	5.6																					
7. Variable (strategic) (part)	GNO09 (south)	45.9																					
8. Variable (smaller)	HIX16	2.2																					
	HIX19	3.8																					
	WES02	12.7																					
	WES03	1.6																					
9. Shortlisted	BER02	10.0																					
	BER04	29.3																					
	BER05	7.5																					
	GNO05	5.6																					
9. Shortlisted	GNO18	4.3																					
	HIG05	3.0																					
	HIX01	2.3																					
	HIX03	0.3																					
	HIX04	1.6																					
	SRUR06	8.4																					
	SRUR11	2.4																					
	STAFMB18	0.4																					

Status	Ref.	Area	SAC	Ramsar	SSSI	SBI	Priority habitat	AONB	Green Belt	Agricultural land	Flood risk	Conservation area	G1 listed building	G2* listed building	G2 listed building	RPG	Scheduled monument	Town centre	Neighbourhood centre	REI	PEL	Local Green Space	IMD
	STO14	22.9																					
	STO17	3.1																					
	TIX02	61.5																					
10. Shortlisted (emp)	HIX08	13.1																					
	HIX17	6.7																					
11. Rejected	BRA01	2.4																					
	BRA04	0.5																					
	BRO03	2.6																					
	BRO04	0.8																					
	BRO05	1.1																					
	CHE01	0.9																					
	CHU01 (a)	1.1																					
	CHU01 (b)	1.4																					
	CHU02	2.0																					
	COL02 & COL05	0.2																					
	COL04	0.1																					
	COL06	2.5																					
	COL08	2.7																					
	COL10	3.7																					
	COL13	31.1																					
	COL14	2.4																					
	COL17	3.3																					
	CRE01 & CRE03	17.7																					

Status	Ref.	Area	SAC	Ramsar	SSSI	SBI	Priority habitat	AONB	Green Belt	Agricultural land	Flood risk	Conservation area	G1 listed building	G2* listed building	G2 listed building	RPG	Scheduled monument	Town centre	Neighbourhood centre	REI	PEL	Local Green Space	IMD
	CRE04	2.8																					
	CRE05	0.8																					
	CRE06	2.6																					
	DOX01	2.7																					
	ECC01	2.2																					
	ECC02	6.5																					
	ECC03	4.8																					
	ECC06	26.1																					
	ECC07	21.8																					
	ECC09	2.7																					
	ECC12	2.0																					
	ECC14	11.5																					
	ECC18	0.6																					
	ECC22	1.4																					
	FUL05	0.5																					
	GNO03	0.4																					
	GNO04 (east)	8.8																					
	GNO06	0.6																					
	GNO09 (north)	51.7																					
	GNO11	3.2																					
	GNO15	5.3																					
	GNO16	0.6																					
	HAU05	2.1																					

Status	Ref.	Area	SAC	Ramsar	SSSI	SBI	Priority habitat	AONB	Green Belt	Agricultural land	Flood risk	Conservation area	G1 listed building	G2* listed building	G2 listed building	RPG	Scheduled monument	Town centre	Neighbourhood centre	REI	PEL	Local Green Space	IMD
	HAU06	0.8																					
	HIG08	2.7																					
	HIG09	4.7																					
	HIX05	4.7																					
	HIX09	0.1																					
	HIX10	1.8																					
	HIX12	6.4																					
	HIX13	0.8																					
	HIX14	1.1																					
	HIX15	1.1																					
	HIX18	1.0																					
	HIX20	5.1																					
	HOP07	2.1																					
	HOP10	2.7																					
	MIL02	0.3																					
	MIL04	1.4																					
	SAL01	0.6																					
	SEI03	0.5																					
	SEI04	34.6																					
	SEI05	0.2																					
	SEI08	0.7																					
	SEI09	2.1																					
	SEI10	0.5																					

Status	Ref.	Area	SAC	Ramsar	SSSI	SBI	Priority habitat	AONB	Green Belt	Agricultural land	Flood risk	Conservation area	G1 listed building	G2* listed building	G2 listed building	RPG	Scheduled monument	Town centre	Neighbourhood centre	REI	PEL	Local Green Space	IMD
	SEI11	0.3																					
	SEI12	0.2																					
	SEI14	8.8																					
	SEI15	3.8																					
	Site 11	0.2																					
	Site 6a	0.0																					
	SRUR01	0.4																					
	SRUR02	0.4																					
	SRUR03	1.1																					
	SRUR04	134																					
	SRUR10	22.4																					
	SRUR12	3.0																					
	SRUR14	1.8																					
	SRUR15	1.3																					
	STAFMB01	5.0																					
	STAFMB07	1.3																					
	STAFMB09	4.5																					
	STAFMB13	3.5																					
	STAFMB19	2.9																					
	STAFMB21	0.3																					
	STAN01	2.8																					
	STO03	1.9																					
	STO04	4.7																					

Status	Ref.	Area	SAC	Ramsar	SSSI	SBI	Priority habitat	AONB	Green Belt	Agricultural land	Flood risk	Conservation area	G1 listed building	G2* listed building	G2 listed building	RPG	Scheduled monument	Town centre	Neighbourhood centre	REI	PEL	Local Green Space	IMD
	STO06	36.5																					
	STO12	1.1																					
	SWY01	0.3																					
	TIX01	0.1																					
	YCM03	0.8																					
	YCM08	0.4																					
	YCM12	7.4																					



Houses under construction locally

Appendix VI: Settlement scenarios

Introduction

The aim of this appendix is to present the detailed analysis behind the summary analysis presented in Section 5.4.

Specifically, for each of the settlements within the top four tiers of the settlement hierarchy, informal consideration is given to reasonable alternative approaches that might be taken to allocation ('growth scenarios'), mindful of site specific, settlement specific and borough-wide strategic considerations. The focus is on the 57 sites that passed Stage 4 of the site selection process, as reported in Section 5.3. The ultimate aim is to conclude on settlement-specific scenarios that reasonably need to be taken forward to Section 5.5, where settlement scenarios are combined in order to arrive at borough-wide scenarios. The aim is *not* to present a formal appraisal of reasonable alternatives.

Stafford

Stafford is suited to receiving a significant proportion of growth through new local plan allocations on account of being the largest town in the borough, with a vibrant town centre and a series of large employment areas across the northern arc of the town. Stafford is also set to benefit from a station on HS2, and is relatively well-connected nationally, and in particular to Birmingham, the Black Country and Stoke-on-Trent, which is an argument in favour of higher growth, given the issue of unmet housing needs from these areas. However, there is a large amount of committed growth following the Plan for Stafford Borough (2014), which allocated strategic urban extensions to the west, north (the largest) and east (the smallest). These SDLs have proved challenging to bring forward, but all are now either completed or under construction. Important constraints to growth are around secondary school capacity, road infrastructure capacity (e.g. gaps in the network due to river corridors, although this has improved through the Stafford Western Access Route scheme, which recently opened) and wide ranging sensitivities associated with the corridors of the Rivers Sow and Penk.

A total of fourteen sites passed through Stage 4 of the officer-led site selection process. However, three of these need not be considered further as they are brownfield sites within the adopted settlement boundary for Stafford Town, namely:

- STAFMB18 (Former Kingston Centre site; 13 homes) is now non-deliverable,[36] because the land is being used to facilitate the re-location of St Leonard's school;
- HOP03 (Former Staffordshire University site; 98 dwellings) and HOP08 (MoD Site 4; 396 homes) – are supported for redevelopment in the fullness of time, but the timetable is currently highly uncertain, such that there is no potential to confidently assume a trajectory of supply at the current time.

Of the eleven remaining sites, three stand-out as performing strongly, particularly in light of secondary school capacity considerations, namely:

- STAFMB12 (**Stafford Police Station**; 13 dwellings) – this is a previously developed site in the town centre, hence there is a strong argument for allocation, albeit there are a range of detailed considerations, for example around whether use can be made of the existing building.
- STAFMB03 (**Land at Ashflats**; 268 dwellings) – is located at the southern extent of Stafford, where there is existing school capacity to accommodate growth. The site is well-contained in landscape terms, located between the railway line to Wolverhampton and the M6, and is considered subject to fairly low environmental constraint overall. The site also has the benefit of being very well connected to Wolverhampton and the Black Country by road, being located at the very southern extent of the borough and the M6 Junction 13 nearby. However, flood risk (including extensive surface water) is an issue, as is proximity to sources of noise and potentially air pollution, plus the site is almost 3km distant from Stafford town centre (although there is a good bus service via the A449).
- **Stafford Station Gateway** – there is strong support for the scheme in many respects, as it would involve regeneration of an underused brownfield site adjacent to an integrated HS2 station. However, there is a question-mark regarding capacity, including due to flood risk. Capacity is currently understood to be ~900 homes (alongside other uses), with the potential need for primary school expansion in the vicinity.

The remaining eight sites are located to the east and southeast of Stafford, and form three clusters:

[36] NPPF paragraph 68 defines 'deliverable' sites as those assessed as being likely to come forward within five years, whilst 'developable' sites are those that, whilst not deliverable, are assessed as likely to come forward within the plan period.

- **Northeast** – HOP02, HOP04, HOP05 and HOP09 are being jointly promoted as 'Beacon Hill', specifically, for up to 2,000 new homes plus other uses. There are a range of issues, particularly relating to topography and landscape sensitivities, with elevation ranging from 137m (Beacon Hill, which is a prominent landscape feature, complete with a woodland copse) to 90m (a stream corridor). However, a benefit of the site is the potential for containment between the current urban edge and the planned route of HS2. Furthermore, the latest proposal (2022) is to provide space for a secondary school (also extensive green infrastructure, to include a country park), although there is a need for caution, given the potential for proposed schemes to be amended. The proposal received through consultation in 2020 involved up to 2,500 homes and a further extension to Beacon Business Park plus a primary school.
- **East** – site TIX02 is being promoted as an extension to the completed Stafford East (Tixall Road) strategic allocation from the adopted local plan. A scheme proposal was submitted in 2018, proposing 1,200 homes (albeit with some uncertainty, with two concept masterplans presented), plus a new primary school and neighbourhood centre, which would also serve the recently delivered new community at Stafford East. Regardless, the concern is that this is a less logical location for expansion of Stafford, as it would breach strong settlement boundary features (Blackheath Covert, cemetery / crematorium, Blackheath Lane, Hanyards Lane, St. Thomas Priory, bridge over the River Sow, Baswich Meadows SSSI) and risk further 'creep' towards Cannock Chase, impacting on an attractive rural landscape at the Stafford-edge (albeit this concern also applies to the site discussed above); and the site is located between A-road corridors (albeit the eastern access improvements have been delivered). It is recognised that the site is well-located in terms of ability to easily and safely walk to a secondary school.

  Finally, there is a need to consider the necessary expansion of the local secondary school (Weston Road Academy, which also serves land to the northeast, discussed above). There is the potential for expansion to accommodate up to 2,000 homes within its catchment (the east of Stafford and Hixon/Weston), but the smaller nature of this scheme (1,200 homes) could possibly lead to viability challenges, i.e. a preferable approach would be for a single scheme to deliver 2,000 homes.
- **Southeast** – three sites (BER02, BER04 and BER05) surround Walton-on-the-Hill, which is a historic hilltop village with a designated conservation area, including a prominent church, albeit there are only two grade 2 listed buildings. Related to the historic environment constraint is clear landscape constraint, with land descending east from the village to a valley that marks the western extent of Cannock Chase AONB. The three sites are being promoted individually, rather than in combination, and the largest of the sites was proposed for just 225 homes through the latest submission (2019), such that there is no 'strategic' scheme equivalent to those discussed within the two bullet points above.

  Focusing on the 225 home scheme, this has some merit from a perspective of containment within the landscape, and the proposal is to deliver a new shop and medical centre, which could have the effect of creating something of a new community hub between Walton-on-the-Hill and Weeping Cross / the east of Stafford, to the west. Also, the proposal is to deliver a significant area of new greenspace, which would be notably adjacent to an area of heathland priority habitat (adjacent to the railway).

  However, the effect of development would be to develop the narrow landscape gap between Walton-on-the-Hill and Weeping Cross / the east of Stafford, and achieving a new access junction onto the A513 could potentially prove challenging, given the number of existing junctions in the vicinity. Perhaps most importantly though, there would be a need for expansion of the local primary school and secondary school, which could create viability challenges. As a broad rule of thumb, around 500 homes would be needed to fund a ½ form entry expansion to Walton High.

In light of the bullet point discussion presented above, the option of expansion to the northeast (henceforth '**Beacon Hill**') is considered sequentially preferable. The option of growth to the east can then be ruled out, because allocating both sites in combination would lead to an over-concentration of growth (given alternative locations for growth elsewhere in the borough), and because – ahead of the potential for Beacon Hill to deliver a secondary school being confirmed – there is a need to consider insufficient capacity at Weston Road Academy to accommodate both schemes. With regards to the option of growth Walton-on-the-Hill, there could feasibly be some development potential, but there are clear challenges, perhaps most notably in respect of schools capacity, and any growth would be relatively 'non-strategic'.

In light of this discussion, the option of a strategic scheme at Beacon Hill was taken forward to be appraised alongside three other competing strategic growth options (borough-wide) – see **Appendix IV**. It is recognised that the question of whether Beacon Hill or TIX02 (Tixall Road) is a preferable location for growth is quite finely balanced, on the basis of the currently available evidence, which is somewhat limited.

In light of this appraisal the decision was reached that Beacon Hill *does* warrant being progressed for further detailed consideration through the appraisal of reasonable alternative growth scenarios for the borough as a whole. There are a range of issues and constraints, but there are strategic arguments for growth at Stafford – given its position in the settlement hierarchy and strong transport links to the north and south – and there is also some merit to the site, as a location for growth, and the proposed scheme.

In **conclusion**, there are two reasonable growth scenarios for Stafford, which are progressed to Section 5.5.

Two reasonable growth scenarios for Stafford

	Homes		Notes on assumptions etc.
	Scenario 1	Scenario 2	
Stafford Police Station	13	13	-
Land at Ashflats	268	268	Adjacent noise sources could affect capacity.
Stafford Station Gateway	900	900	There are potential lower growth options.
Beacon Hill	-	2,000	Further work needed to confirm capacity / scheme detail.
Total	**1,181**	**3,181**	

Employment land growth at Stafford

On the basis of EHDNA (2020), there are arguments to suggest that supply of employment land from committed sites is sufficient to meet needs over the plan period, unless a high housing growth strategy is followed. However, there is also a need to consider changes to the national and local context and baseline situation subsequent to the EHDNA. On the one hand there has been very high demand for / take-up of land employment land (evidence from May 2022 suggests that just 5% of employment units are vacant); however, on the other hand, the economy is predicted to slow.

The upshot is that there is a need to consider the possibility of one or more employment land allocations, and four have been shortlisted (as discussed in Section 5.3). Of the four shortlisted sites, the stand-out largest site would deliver a further extension to Redhill Business Park, and warrants further detailed consideration, although there are sensitivities, including around northward 'sprawl' of Stafford. Another shortlisted site would deliver an extension to Ladfordfields Industrial Estate, between Stafford and Woodseaves, and a challenge here is around access/transport.

The other two shortlisted employment site options are associated with Hixon Airfield, and so are discussed further below, within the section dealing with growth scenarios for Hixon.

Stone

Stone is suited to receiving a proportion of growth through new local plan allocations on account of being the second largest settlement in the borough, specifically the only town other than Stafford. The town has a vibrant town centre, a good local employment offer and good connectivity by road and rail, with the City of Stoke-on-Trent only ten minutes by rail. However, there is a significant amount of committed growth following the Plan for Stafford Borough (2014), which allocated a strategic development location to the west and south, and other constraints to growth associated with the close association of the town with the River Trent and the Trent and Mersey Canal, as well as the Moddershall Valley conservation area to the northeast. High school capacity is also a constraint, with Alleyne's Academy having limited capacity to accommodate additional students (from across the north of Stafford Borough and surrounding villages).

A total of ten sites passed through Stage 4 of the officer-led site selection process.

Three of these are **smaller sites**, namely STO09 (Stone Police Station; 3 homes); STO05 (SCC depot, Newcastle Road; 18 homes); and STO08 / STO10 (Land at Trent Road; 20 dwellings). As smaller sites there are relatively few concerns, although it is noted that STO08 / STO10 is constrained on account of onsite mature trees and the adjacent river corridor.

The next site to consider is STO07 (**Land at Marlborough Road**; 101 homes), which is also judged to perform relatively well. This site is located at the western extent of Stone, distant from the town centre and train station (~2.5km via walking routes), and a short distance to the west is an area of common land (also a public right of way), but the site is otherwise subject to limited constraint and would integrate well in built form terms, somewhat rounding-off the settlement edge.

The next sites to consider, in order of sequential preference, are the following:

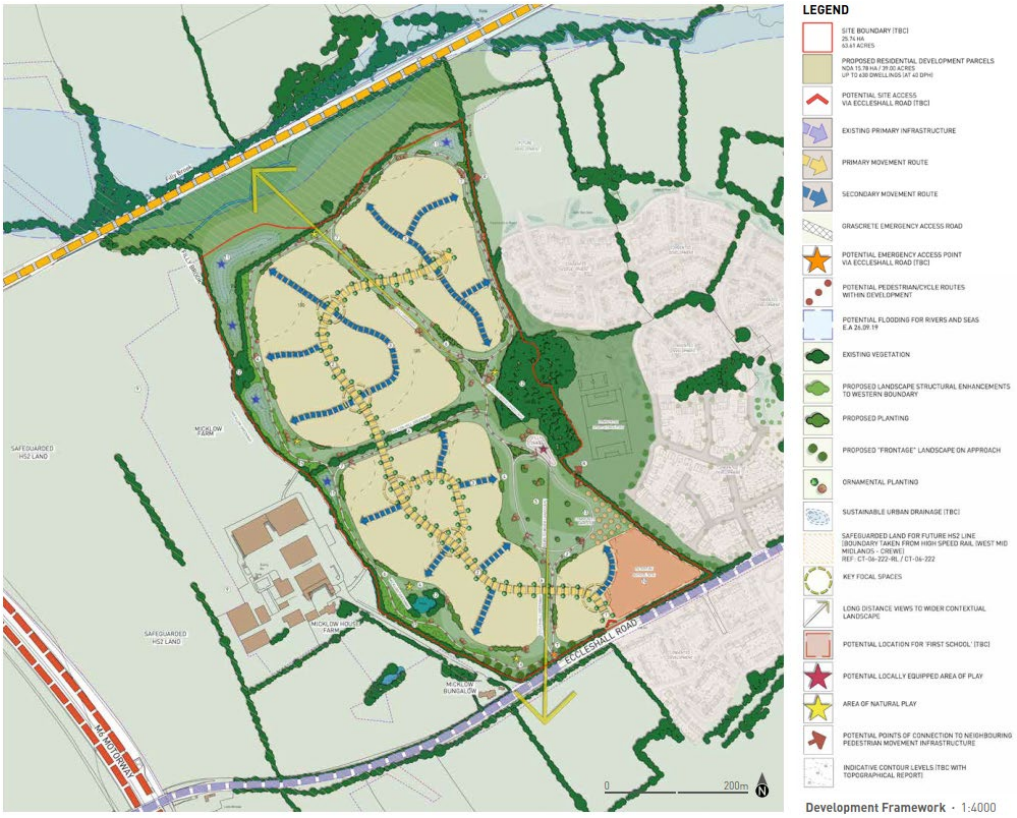
- STO13 (**Land to east of Oakleigh Court**; 131 homes) - is located at the southeast extent of Stone, around 2.5km from the town centre and train station. The site is subject to limited constraint in a number of respects, but notably comprises two fields separated by a historic lane and stream / hedgerow, and there is a need to consider landscape containment. However, an overriding question is regarding capacity at the nearby level crossing (on the B5027).
- STO16 (**Land at Uttoxeter Road**; 97 homes) – is located close to STO13, and is located near-adjacent to the aforementioned level crossing. Again, the site is subject to limited constraint in a number of respects, but is notably split in two parts, specifically two fields separated by a historic hedgerow associated with a surface water flood risk channel (less significant than STO13). As per STO13, a potentially overriding question is regarding the level crossing.

The final sites to consider are sequentially less preferable:

- SRUR06 (167 dwellings) and SRUR11 (59 dwellings) – are located to the **south of the A51** and would lead to new development beyond this physical barrier, poorly linked to Stone and distant from the town centre. Also, this sector of land is strongly associated with the river corridor, including extensive priority habitat (albeit no Sites of Biological Importance, SBIs), the Trent and Mersey Canal Conservation Area, Aston Marina, the Two Saints Way and a series of listed buildings between Stone and Aston-by-Stone.
- STO14 (**Land at Eccleshall Road**, Walton; 478 homes) - is a much larger site that would extend the Stone West strategic development location from the Plan for Stafford (2014), which is currently building-out, and nearing completion. The presence of the adjacent Stone West SDL serves as an argument against further growth in this location in the short term, and the site also potentially performs worse than the Stone West SDL in built form and landscape terms. Specifically, this may be the case given the location of the site to the west of a notable hill, on the crest of which is a woodland copse. There could be some potential for development to 'round off' the settlement edge, but development of the site in full would seem likely to have a significant landscape impact, with the land in question highly visible on the approach to Stone from Eccleshall. However, having said this, the landscape in question is due to be significant impacted by HS2, and that the presence of HS2 could create a long-term defensible western boundary to Stone (a further consideration is construction works, with implications for the phasing).

  Other considerations, in respect of STO14, include: capacity at the A34 / B5026 (Eccleshall Road) junction (although detailed work might serve to show that capacity exists, or that necessary upgrades are achievable); and school capacity – there is insufficient capacity at Alleynes Academy, and there would potentially be a need to expand the both the local first school and middle school. A submission received from the site promoters in 2020 proposed a new first school, but this was on assumption of "575-630 dwellings (at between 37 and 40 dwellings per net hectare)."

Concept masterplan received from the site promoter in 2020



Finally, there is a need to briefly mention STO17 (Mount Land Industrial Estate), which comprises an industrial estate located close to the train station and town centre. The possibility of redevelopment for housing has been considered, but the current view is that the site should not be allocated for housing.

In **conclusion**, on balance there is only one reasonable growth scenario for Stone, involving six sites discussed above as sequentially preferable. These six sites in combination have a total combined capacity 370 homes, which is a broadly appropriate scale of growth for Stone, given recent and committed growth. However, it is recognised that several of these site areas are associated with a degree of delivery risk and / or question-marks regarding capacity, such that there could be a need to revisit matters subsequent to the current consultation. At the current time there is considered to be insufficient strategic argument for exploring a higher growth scenario, e.g. involving additional allocation of STO14.

One reasonable growth scenario for Stone

	Homes	Notes on assumptions etc.
	Scenario 1	
Stone Police Station	3	-
SCC depot, Newcastle Road	18	-
Land at Trent Road	20	Biodiversity constraint could affect capacity.
Land to east of Oakleigh Court	131	Level crossing constraint, also need to confirm site extent.
Land at Marlborough Road	101	-
Land at Uttoxeter Road	97	Level crossing constraint, also need to confirm site extent.
Total	**370**	May need to revisit/identify other options post consultation.

Meecebrook Garden Community (GC)

Meecebrook GC is unique, among the Strategic Development Site options, and other strategic site options under consideration here, in that it is not currently associated with a settlement in the top three tiers of the hierarchy. Rather, it is associated with Cold Meece which is a fifth tier settlement (albeit the site is also close to Yarnfield, which is a fourth tier settlement). As such, it warrants stand-alone consideration here.

There are strong arguments for testing the option of Meecebrook GC, as it has been consistently found to be associated with a strong degree of merit in wide-ranging respects, including through the appraisal presented in Appendix IV. Amongst other things, there is an opportunity to deliver strategic infrastructure potentially to include a new station on the railway line between Crewe to the north and Stafford / Wolverhampton to the south. In turn, the site could be well-placed in respect of providing for unmet needs.

However, there are issues with regards to land availability, with extensive areas of land thought to be available at the time of the Issues and Options consultation (following a call for sites) now unavailable (specifically MOD land at Swynnerton Training Area, and farmland in the vicinity of Upper Heamies). This led the Council to undertake further work to explore land availability, following the Issues and Options consultation, which led to additional land being identified as available. The net effect is that the current site 'red line boundary' is shifted significantly to the west, in the direction of Eccleshall, relative to the assumed red line boundary at the time of the Issues and Options consultation. Within this adjusted red-line boundary there is capacity for at least 6,000 homes, at which scale there would be the potential to deliver a range of strategic infrastructure, likely to include a train station (detailed feasibility work has been completed, but there remain uncertainties). However, a 6,000 home scheme could have drawbacks relative to a scheme of up to 11,500 homes, as previously envisaged.

A final question is in respect of delivery timescales. It is fair to assume that delivery would be in the final 10 years of the plan period, at a rate of between 200 - 300 dpa, hence it is considered fair to assume up to 3,000 homes in the plan period.

In **conclusion**, there are two reasonable growth scenarios.

Two reasonable growth scenarios for Meecebrook GC

	Homes		Notes on assumptions etc.
	Scenario 1	Scenario 2	
Meecebrook GC	0	3,000	6,000 in total plus ~15 ha employment
Total	**0**	**3,000**	

Barlaston

All site options at Barlaston were ruled-out at or prior to Stage 4 of the officer-led site selection process.

Barlaston is located within the North Staffordshire (Stoke-on-Trent) Green Belt and, as discussed, there is little or no potential to demonstrate the exceptional circumstances to release land from the Green Belt. Barlaston saw just 28 homes increase in dwelling stock over the period 2011-22, but this does not serve as an overriding reason to justify Green Belt release, nor are there are any other overriding reasons.

In **conclusion**, there is only one reasonable growth scenario for Barlaston: **nil allocations**.

Blythe Bridge

All site options at Blythe Bridge were ruled-out at or prior to Stage 4 of the officer-led site selection process.

Blythe Bridge is located at the very northern edge of the Borough, and that part of the settlement edge falling within the Borough boundary is located within the North Staffordshire Green Belt, plus this part of the Blythe Bridge settlement edge is strongly defined by the A50 dual carriageway. As discussed, there is little or no potential to demonstrate the exceptional circumstances to release land from the Green Belt, and this is particularly the case for Blythe Bridge, given land to the north of the urban area falls outside of the Green Belt (within Staffordshire Moorlands District).

In **conclusion**, there is only one reasonable growth scenario for Blythe Bridge: **nil allocations**.

Eccleshall

All site options at Eccleshall were ruled-out at or prior to Stage 4 of the officer-led site selection process, due to lack of available capacity at Sir Graham Balfour high school in Stafford.

There are strategic arguments for a degree of growth at Eccleshall, e.g. given a relatively good local retail and services / facilities offer. However, on the other hand, Eccleshall has seen significant growth over recent years. Specifically, two extensions to the village have been delivered, and in total 333 homes were delivered over the period 2011-22.

Regardless, it is difficult to foresee a means of overcoming the secondary school constraint. One option is to send students to a different Stafford secondary, but that is not considered to be a reasonable option on transport / traffic grounds. Furthermore, pupils cannot be bussed to the high school in Stone as Eccleshall is a two-tier education system and Stone is a three-tier education system.

In **conclusion**, there is only one reasonable growth scenario for Eccleshall: **nil allocations**.

Gnosall

A total of five sites passed through Stage 4 of the officer-led site selection process.

Two of these sites are quite strongly supported, namely: GNO02 (**Land at Bank Top Garage**; 9 homes) – is a small previously developed site; and GNO04 (west) (**Land at Manor Farm Holding no 9**; 100 homes) – relates well to the settlement edge and village centre, and would benefit from direct access onto the A518 and, in turn, bus services.

These two sites in combination would deliver a total quantum of homes that is potentially appropriate for Gnosall, including noting that 212 homes came forward at the village over period 2011-22 (12.4% growth in dwelling stock), primarily through an expansion to the south of the A518 (adjacent to GNO04 west).

However, it is also considered reasonable and appropriate to consider the possibility of higher growth, noting that Gnosall benefits from relatively good connectivity to Stafford (also Newport and Telford to the west), including by bus, and given relatively few strategic environmental constraints.

The possibility of large-scale strategic growth at Gnosall was considered as an option at the issues and options stage, but is now considered unreasonable, given site-specific sensitivities, but also mindful of the number of homes required (under reasonably foreseeable scenarios) and preferable locations for strategic growth (e.g. in transport terms). Specifically, the option of a new settlement between Gnosall and Haughton was ruled out relatively early in the SBC-led site selection process undertaken subsequent to the Issues and Options stage (hence is not shown in the figure below), whilst the option of a strategic urban extension to roughly double the size of the village (comprising SHELAA sites GNO04 east and west and GNO09 north and south) was ruled out later in the process (and is shown in the figure below).

However, there is still the option of modest strategic growth. Options for additional growth are as follows:

- GNO05 (**Land at The Horse Shoe**; 101 homes) – does not relate well to the village built form, being associated with an area historically known as Audmore, and bounded on all sides by a historic lane. Also, a public right of way passes through the land, indicating landscape sensitivities, and there are transport constraints in terms of traffic travelling north from the site out of Gnosall and beyond.
- GNO09 (south) (**Land between A518 and disused railway line**) – this site includes GNO04 (west), as discussed above, hence the question is in respect of an expanded scheme. There are two options:
  - An additional 354 homes, leading to a scheme of 454 homes in total, which would have the benefit of containing growth to the north of the disused Newport to Stafford railway line, which is now a cycle path, albeit this is not thought to be a particularly strong landscape feature / defensible boundary. An expansion to the village primary school would be necessary, but would likely be achievable and viable.
  - An additional ~800 homes, leading to 900 homes in total, amounting to a strategic urban extension. A scheme of this size could deliver a new primary school, and would benefit from relatively good access to Stafford, including by off-road cycle route (albeit unlit), and this area is subject to limited strategic environmental constraint. However, it could prove challenging to achieve a good degree of landscape containment, potentially with a risk of further development creep along the valley of Doley Brook. This option is appraised in **Appendix IV**.
- On balance, the smaller option (an additional 354 homes, over-and-above 100 homes at GNO04 (west) is judged to be preferable, given site-specific issues / concerns with the larger scheme, but also given strategic understanding of the scale of growth that is appropriate at Gnosall, given preferable locations for growth across the borough and the total number of homes required borough-wide.
- GNO18 (**East of Knightley Road**; 77 homes) – appears not to be subject to any headline environmental constraints, and relates well to the existing settlement edge. Also, there is footpath connectivity to the village centre, and the village GP surgery is near adjacent (where there is a bus stop). However, the site is located distant from the A518 corridor and primary school (about 1km from the site, via walking routes), such that development would lead to significant additional traffic passing through the village.

In **conclusion**, in addition to a scenario involving 109 homes at GNO02 and GNO04 (west)), it is reasonable to also explore a scenario involving additional allocation of GNO09 (south) in part. A higher growth option involving allocation of GNO18 is unreasonable because there would be insufficient capacity at the village primary school, and it is unlikely that an expansion could be viably delivered.

The figure below presents a summary of the site-sifting process at Gnosall (albeit not highlighting the part of GNO09 (South) north of the former railway / cycle path as sequentially preferable to the extent that it warrants being taken forward to the reasonable growth scenarios). The box below presents a summary.

Summary of the site sifting process at Gnosall

The starting point was the AECOM study to explore strategic development site options in 2019, and the Issues and Options / Interim SA Report consultation in 2020, which considered two strategic growth options at Gnosall.

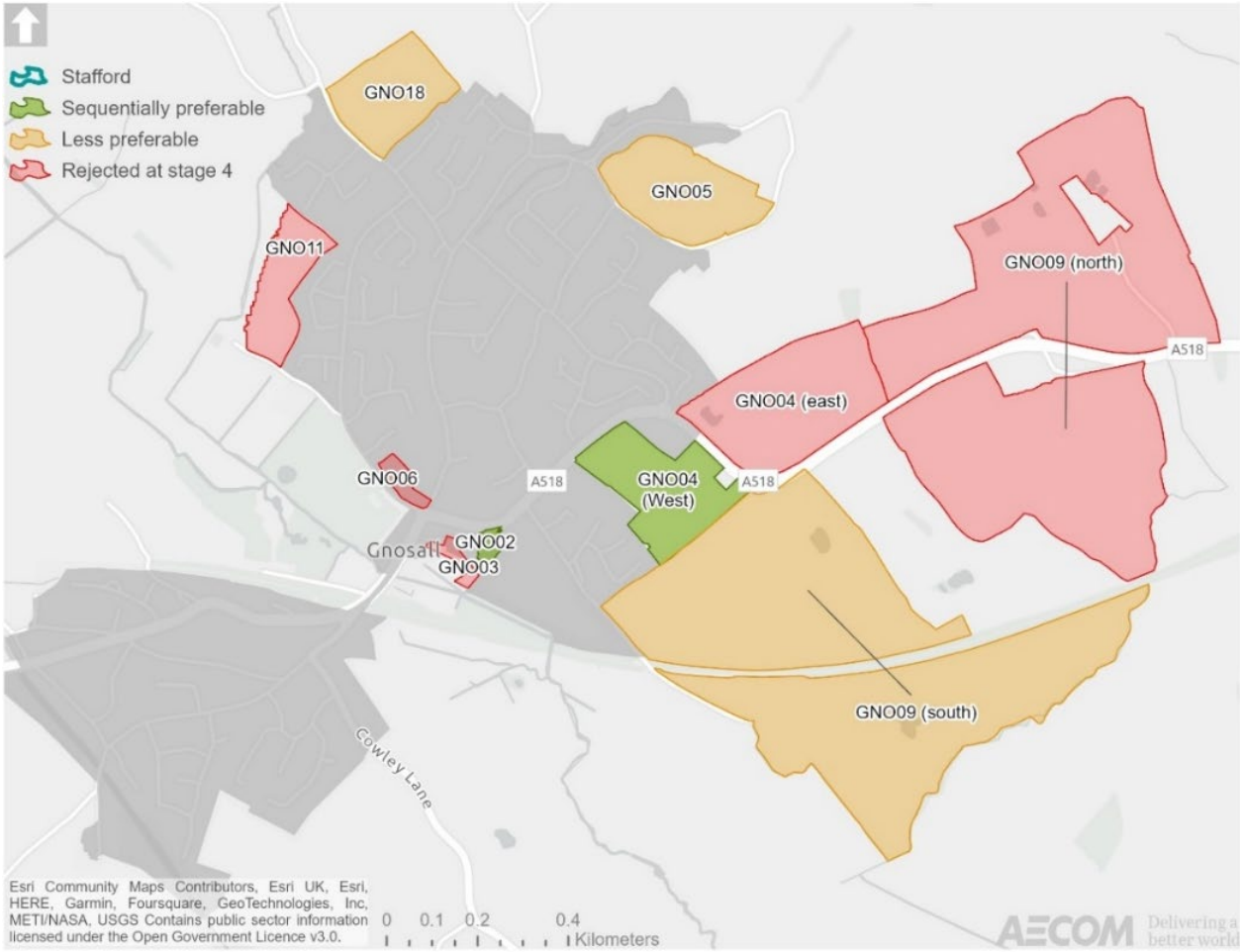
Subsequently officers embarked on a site selection process, with a number of sites being rejected at either stage 1 or stage 2. These sites are not shown on **the figure below.** Next officers completed stages 3 and 4 of the site selection process, which led to five sites being rejected, namely the five sites shaded red in **the figure below**.

The remaining sites were placed into two broad categories: sequentially preferable; and sequentially less preferable, and a decision was then made that allocation of the two sequentially preferable sites, in combination, represents a reasonable low growth scenario. With regards to the sequentially less preferable sites in contention for allocation in order to deliver higher growth, these were differentiated on the basis of the discussion presented above and in Appendix IV, which led to the identification of a preferable site and higher growth scenario.

Two reasonable growth scenarios for Gnosall

	Homes		Notes on assumptions etc.
	Scenario 1	Scenario 2	
Land at Bank Top Garage	9	9	
Land at Manor Farm Holding no 9	100	100	
Land b/n A518 and disused railway	-	354	Primary school expansion required.
Total	**109**	**463**	

Site options at Gnosall



Great Haywood

All site options at Great Haywood were ruled-out at or prior to Stage 4 of the site selection process.

There are strategic arguments for a degree of growth at Great Haywood, e.g. given good road links to neighbouring areas to the south and Stafford Town. However, on the other hand, Great Haywood has seen significant growth over recent years. Specifically, one extension to the south of the village has been delivered and another to the southeast is under construction, with a total of 281 homes delivered over the period 2011-22. Also, the village is sensitive on account of its close relationship with the River Trent, the historic National Trust estate at Shugborough and Cannock Chase, with Cannock Chase SAC under 2km distant. It should also be noted that land around Great Haywood is designated at Local Green Space in the adopted Neighbourhood Plan.

In **conclusion**, there is only one reasonable growth scenario for Great Haywood: **nil allocations**.

Haughton

All site options at Haughton were ruled-out at or prior to Stage 4 of the site selection process.

There are strategic arguments for a degree of growth at Haughton, e.g. given good road links to Stafford and the lack of a village conservation area (unlike Eccleshall, Gnosall and Great Haywood, discussed above). Also, the village has seen very low growth over recent years, specifically 18 homes over the period 2011-22, amounting to a 5.7% increase in dwelling stock. However, on the other hand, Haughton is considerably smaller than the three villages discussed above, and has a relatively limited offer, e.g. with no GP surgery (albeit Gnosall GP surgery is within 4km).

In **conclusion**, there is only one reasonable growth scenario for Haughton: **nil allocations**.

Hixon

At Hixon there is the option of a new SDS at **Hixon Airfield**, which warrants consideration as a comparator to Meecebrook GC, in light of the discussion presented in Appendix IV.

Also, two smaller site options passed through Stage 4 of the site selection process (see Section 5.3) - namely HIX16 (**Land north of Lea Road**; 45 homes) and HIX19+ (**East of Church Land and south of Egg Lane**; 83 homes, which is composed of the individual sites HIX01, HIX03 (north land parcel only), HIX04 and HIX19), and it is considered reasonable and appropriate to test the option of allocating these sites under a scenario whereby Hixon Airfield SDS is not supported. It is recognised that there are constraints to growth, perhaps most notably in respect of the lack of secondary school capacity (the Weston Road Academy at Stafford would require expansion, and this would need to be funded by development) and proximity of Special Areas of Conservation (SACs) to the west and east. Also, Hixon has seen significant recent growth, with 177 homes delivered over the period 2011-22, amounting to a 24.7% increase in dwelling stock. However, in other respects Hixon is subject to limited constraint (e.g. there is no conservation area) and Hixon benefits from a very strong local employment offer together with primary school capacity, as well as good north / south connectivity via the A51 (although connectivity west to Stafford is less strong; and overall connectivity by bus is quite poor, e.g. relative to Gnosall).

Finally, there is a need to consider two shortlisted employment site options, which overlap with the Hixon Airfield SDS option. There is potentially a need to allocate new employment land through the plan, as has been discussed above (see Box 5.2). However, the two shortlisted site options that would involve an extension to Hixon Airfield Industrial Estate are considered sequentially less preferable to the other two shortlisted employment land options discussed above within the section dealing with Stafford. This reflects the location of Hixon on the strategic road network, and the fact that there is already a committed extension to the industrial estate that will increase its size by around a third.

In **conclusion**, there are three reasonable growth scenarios for Hixon.

Three reasonable growth scenarios for Hixon

	Homes			Notes on assumptions etc.
	Scenario 1	Scenario 2	Scenario 2	
Land north of Lea Road	-	45		Would likely need to be allocated in combination with growth elsewhere (e.g. Weston) to achieve a pool of funds to address secondary school issue.
East of Church Land	-	83		
Hixon Airfield	-	-	1,985	Would also deliver employment.
Total	**0**	**128**	**1,985**	

Little Haywood and Colwich

All site options here were ruled-out at or prior to Stage 4 of the site selection process.

There are strategic arguments for a degree of growth, e.g. given good road links to neighbouring areas to the south and Stafford Town. Also, the village has seen very low growth over recent years, specifically 13 homes over the period 2011-22, amounting to a 1.4% increase in dwelling stock. However, on the other hand, the village is sensitive on account of its close relationship with the River Trent and Cannock Chase, with Cannock Chase SAC around 1km distant. Also, the river corridor to the south / west and the A51 to the east would suggest a need to focus attention on north as a potential direction for growth, but land here is sensitive on account of forming the landscape gap between Little and Great Haywood as well as partly designated in the adopted Neighbourhood Plan as Local Green Space.

In **conclusion**, there is only one reasonable growth scenario: **nil allocations**.

Meir Heath / Rough Close

All site options at Meir Heath / Rough Close were ruled-out at or prior to Stage 4 of the officer-led site selection process, reflecting the location of Meir Heath / Rough Close in the Green Belt.

As discussed, there is little or no potential to demonstrate the exceptional circumstances to release land from the Green Belt, and there are no overriding arguments for growth at Meir Heath / Rough Close.

In **conclusion**, there is only one reasonable growth scenario: **nil allocations**.

Weston

Two site options at Weston passed through Stage 4 of the officer-led site selection process.

The two sites - WES03 ((**Land south of Green Road**; 33 homes) and WES02 (**Land south west of the A51**; 228 homes) - are located adjacent to one another, and would presumably come forward together in order to deliver a large extension to the south of the village. This sector of land is notably constrained by the adjacent Trent and Mersey Canal Conservation Area, although the towpath along this stretch is not a formal public right of way. Also, Stafford bound traffic would likely pass through the village first in order to reach the A518 although, on the other hand, there would be direct access onto the north-south A51.

On balance, it is considered reasonable to explore the option of allocation at Weston, despite limited services / facilities at Weston, in comparison to most other tier 4 villages, and the fact that growth would necessitate an expansion of the Weston Road Academy at Stafford. There is a primary school at Weston, and the village benefits from good road connectivity in all directions, with Stafford town centre under 15 minutes by car or around 30 minutes by bus (although bus frequency is poor). The combined capacity of the two sites discussed above is in excess of the capacity of the primary school to accommodate growth (and it is noted that the school is located in the village centre, with seemingly little or no potential for expansion); however, a reduced capacity scheme at WES02 would likely not give rise to any issues, and could be appropriate to avoid undue expansion of the village to the south, along the river valley.

In **conclusion**, there are two reasonable growth scenarios for Weston.

Two reasonable growth scenarios for Weston

	Homes from allocations		Notes on assumptions etc.
	Scenario 1	Scenario 2	
Land south of Green Road	0	33	Would likely need to be allocated in combination with growth elsewhere (e.g. Hixon) to achieve a pool of funds to address secondary school issue.
Land south west of the A51	0	228	
Total	**0**	**Up to 175**	Primary school capacity limits growth.

Woodseaves

A total of six sites passed through Stage 4 of the officer-led site selection process.

Three of these are very small sites, namely: HIG07 (**Garage off A519**; 2 homes), HIG11 (**Land at Lillingstone House**; 5 homes) and Site 07 (**Land off Moscow Lane**; 5 homes).

The other two sites are notably larger, namely:

- HIG10 (**Land adjacent to the Croft**; 25 homes) – relates quite well to the settlement edge, and would benefit from good access onto the A519, although topography falls away from the village edge in this direction, and this is attractive undulating land visible from the A519. The potential for a more comprehensive scheme also involving land to the east might be considered.
- HIG13 (**Land to rear Woodseaves C of E School**; 88 homes) – relates very well to the settlement edge, and would again benefit from good access onto the A519. However, the site forms part of a very large field that is highly visible from the A519.

Finally, there is a need to consider HIG05 (62 homes), located to the **southeast of the village**. However, this is a sequentially less preferable site, as it relates relatively poorly to the settlement edge, would require access onto a rural land and is relatively distant from the A519.

Overall, it is reasonable to assume 125 homes across the five sites discussed above as sequentially preferable. There are strategic arguments in support of growth at Woodseaves, including limited environmental and historic environment constraint (just one grade 2 listed building). Also, Woodseaves has seen relatively limited recent growth, specifically 32 homes over the period 2011-22, amounting to a 11.9% increase in dwelling stock. However, on the other hand, Woodseaves is a rural village with a limited offer, e.g. the nearest GP surgeries are at Eccleshall and Gnosall, and Woodseaves is associated with a notably raised, rolling landscape. Also, there is understood to be limited capacity at the village primary school (the possibility of extending the school into site HIG13 might feasibly be explored). A final point to note is a notable sector of land to the northwest that could potentially be explored (including rejected site HIG08), if access could be achieved, although topography falls away from the village edge in this direction.

In **conclusion**, there is only one reasonable growth scenario for Woodseaves.

One reasonable growth scenario for Woodseaves

	Homes	Notes on assumptions etc.
	Scenario 1	
3 x small sites	13	-
Land adjacent to the Croft	25	A more comprehensive scheme could be explored.
Land to rear Woodseaves C of E School	88	Forms part of a much larger field.
Total	**125**	

Yarnfield

All site options at Yarnfield were ruled-out at or prior to Stage 4 of the officer-led site selection process.

Yarnfield is falls within the Green Belt and has seen growth over recent years, with 261 homes delivered over the period 2011-22, amounting to a 49.6% increase in dwelling stock.

In **conclusion**, there is only one reasonable growth scenario for Yarnfield: **nil allocations**.

Tier 5 villages

There is little or no argument for allocating land through the local plan, given inherent sustainability constraints to growth at these locations, particularly from an accessibility and transport perspective, and also mindful of the potential for parish councils to allocate sites through the neighbourhood planning process. The NPPF requires (paragraph 69) local plans to ensure that at least 10% of planned supply is via sites of below 1ha in size; however, at the current time, it is thought that this requirement can be met without allocations at smaller villages, also mindful that small sites will likely be submitted for consideration through the current consultation, which can then be considered for allocation prior to plan finalisation.



A park in Stone

Appendix VII: Growth scenarios

Appraisal findings

The tables below present appraisal findings in relation to the reasonable alternative growth scenarios.

Air and wider environmental quality

1: Gnosall, Hixon and Weston	2: Hixon Airfield	3: Beacon Hill	4: Hixon Airfield and Gnosall	5: Beacon Hill and Gnosall	6: Meecebrook	6a: Meecebrook and CRE02 (emp)	7: Meecebrook and Gnosall	7a: Meecebrook, Gnosall and CRE02	8: Meecebrook and Beacon Hill	8a: Meecebrook, Beacon Hill and CRE02
3	3	1	3	2	1	3	2	3	1	2

Beginning with consideration of the **strategic site options** that are a primary variable across the alternatives, these can be placed in the following order of preference on the basis of the discussion presented in Appendix IV: 1) Beacon Hill (Stafford); 2) Meecebrook; 3) Hixon Airfield.

With regards to the variable **package of smaller sites** at Gnosall, Hixon and Weston, there is generally a concern that dispersed growth would give rise to relatively limited potential to deliver new community infrastructure and investment in transport infrastructure / services alongside housing growth (although Gnosall would facilitate a primary school expansion). Also, whilst there can be a benefit to dispersing growth so as to minimise pressure on individual roads, in this instance growth at both Hixon and Weston would lead to Stafford-bound traffic funnelling through Weston.

With regards to the matter of **total housing growth quantum**, perhaps the primary consideration is the need to deliver sufficient housing to balance employment growth locally, thereby avoiding unsustainable levels of in commuting (discussed further below. It is not clear that there are inherent concerns with higher growth, given the borough is relatively unconstrained in air quality terms (with no designated AQMAs), and recognising that growth would be phased over the course of the plan period, over which time there will be a switch-over to electric vehicles (EVs).

A related question is in respect of providing for a proportion of **unmet needs**, from one or both of the constrained major urban areas to the north and south of the borough, in locations that are well-connected to the area generating unmet needs by rail (first and foremost) and the strategic road network. In this light, there is support for higher growth scenarios involving allocation of Meecebrook, albeit there is a need for further work to confirm what can viably be achieved in terms of transport infrastructure upgrades alongside the new settlement.

Finally, with regards to the question of allocating a large new employment site as a 31.2 ha extension to Redhill Business Park (**CRE02**), this site benefits from good access to the strategic road network, such that there are limited concerns regarding HGV traffic through residential areas. However, there is a high level concern regarding the possibility of an oversupply of employment growth locally relative to housing growth, leading to high levels in-commuting and, in turn, traffic and associated pollution issues. There is much uncertainty ahead of an update to the Economic and Housing Development Needs Assessment (EHDNA); however, at this stage it is appropriate to flag a significant risk.

In **conclusion**, it is a challenge to place the alternatives in an order of preference, given numerous competing factors. The alternatives are ranked so as to highlight some of the key messages discussed above, including: support for Beacon Hill when viewed in isolation; support for Meecebrook as part of a strategy that leads to flexibility to provide for unmet needs; and the importance of balancing housing and employment growth locally.

With regards to **significant effects**, there is a need to recall the package of proposed allocations that are a 'constant' across the growth scenarios, which does include some sites that give rise to a degree of concern regarding air and/or noise pollution (see discussion in Section 9). There is also a need to consider the national context regarding the expected switchover to EVs, as discussed in Appendix IV.

Biodiversity

1: Gnosall, Hixon and Weston	2: Hixon Airfield	3: Beacon Hill	4: Hixon Airfield and Gnosall	5: Beacon Hill and Gnosall	6: Meecebrook	6a: Meecebrook and CRE02 (emp)	7: Meecebrook and Gnosall	7a: Meecebrook, Gnosall and CRE02	8: Meecebrook and Beacon Hill	8a: Meecebrook, Beacon Hill and CRE02
4	4	3	4	2	1	1	1	1	1	1

Beginning with consideration of the **strategic site options** that are a primary variable across the alternatives, these can be placed in the following order of preference on the basis of the discussion presented in Appendix IV: 1) Beacon Hill (Stafford) and Meecebrook; 2) Hixon Airfield.

With regards to the variable **package of smaller sites** at Gnosall, Hixon and Weston, there are limited biodiversity concerns, with none of the sites containing priority habitat. The Weston site is perhaps of greatest note, as it is comprises a large arable field (some historic field boundaries have been removed) adjacent to the Trent river and canal corridor, which is associated with extensive priority habitat. The river / canal corridor to the south of the site is associated with a locally designated SBI and then, beyond that, is Pasturefields Salt Marsh SAC; however, it is not clear that the number of homes envisaged 175 would give rise to a significant concern (water quality impacts may be the primary concern, more so than recreational impacts), plus there would be a good opportunity for targeted habitat creation within the site, adjacent to the river / canal corridor. With regards to Hixon, the only point to note is that the northern site is bounded by historic field boundaries and, in particular, there is a network of strong field boundaries to the west of the site.

With regards to the matter of **total housing growth quantum**, perhaps the primary consideration is that under higher growth scenarios there would be flexibility to provide for unmet needs in locations that give rise to somewhat limited concerns, from a biodiversity perspective, thereby reducing the pressure to provide for unmet needs in more sensitive locations across the sub-region. Focusing on unmet needs from Birmingham and the Black Country, there is an argument to suggest that both Lichfield and South Staffordshire districts are less constrained than Stafford Borough, on the basis of the density of internationally and nationally designated habitats and priority habitat; however, unmet needs are of such a scale that there is an argument for all three districts taking their share in order to avoid pressure on sensitive / valued habitats closely associated with the Birmingham / Black Country conurbation and also the Cannock Chase area.

Finally, with regards to the question of allocating a large new employment site as a 31.2 ha extension to Redhill Business Park (**CRE02**), there are limited biodiversity sensitivities. There is a notable band of priority habitat woodland (not ancient woodland) to the south of the site, which does include a small SBI; however, the business park has already expanded beyond these woodlands; specifically, the band of woodland has now been breached following the recently completed Pets at Home warehouse scheme. There are also several historic field boundaries within the site, although there is little reason to suggest that these are of particular biodiversity value (they appear regular in form, likely dating from enclosure).

In **conclusion**, it is a challenge to place the alternatives in an order of preference, given numerous competing factors. The alternatives are ranked so as to highlight some of the key messages discussed above, primarily: concern with Hixon Airfield (also possibly growth at Weston); and support for providing for unmet needs in locations that give rise to relatively limited concerns, from a biodiversity perspective, in the knowledge that this may reduce pressure on more sensitive locations elsewhere within the sub-region.

With regards to **significant effects**, there is a need to recall the package of proposed allocations that are a 'constant' across the growth scenarios, which does include some sites that give rise to a degree of concern from a biodiversity perspective (see discussion in Section 9). On balance, it is appropriate to flag 'moderate or uncertain' negative effects for the three worst performing scenarios, involving lower growth and/or Hixon Airfield. With regards to the six best performing scenarios, there is an argument for predicting the likelihood of positive effects on the baseline, given the potential to take an ambitious approach to Biodiversity Net Gain (now legislated through the Environment Act) at strategic sites, and given identified opportunities at both Meecebrook (in particular) and Beacon Hill; however, there is much uncertainty at this stage, ahead of further detailed work, e.g. in respect of masterplanning and development viability.

Climate change adaptation

1: Gnosall, Hixon and Weston	2: Hixon Airfield	3: Beacon Hill	4: Hixon Airfield and Gnosall	5: Beacon Hill and Gnosall	6: Meecebrook	6a: Meecebrook and CRE02 (emp)	7: Meecebrook and Gnosall	7a: Meecebrook, Gnosall and CRE02	8: Meecebrook and Beacon Hill	8a: Meecebrook, Beacon Hill and CRE02
=	=	=	=	=	=	=	=	=	=	=

The key consideration here is the need to avoid development - in particular new homes - encroaching on fluvial flood risk zones, noting the possibility of expanded flood risk zones under climate change scenarios. A secondary consideration is the need to avoid surface water flood risk zones, noting that it is often possible to deal effectively with surface water flood risk through masterplanning and design measures, including sustainable drainage systems (SuDS). Another consideration is development impacting (either positively or negatively) on water flows and, in turn, down-hill / down-stream flood risk; however, it is difficult to pinpoint issues / opportunities without undertaking detailed work.

Beginning with consideration of the **strategic site options** that are a primary variable across the alternatives, all three are subject to limited flood risk constraint, as discussed in Appendix IV.

With regards to the variable **package of smaller sites** at Gnosall, Hixon and Weston, none intersect a fluvial flood risk zone, although there is a significant surface water flood channel along the southern edge of the site south of Hixon (with historic OS maps showing a marshy area and a pond here), which could feasibly lead to a challenge in respect securing good road access to the site. With regards to the site south of Weston, this is a low lying landscape close to the confluence of two rivers, such that it would be important to consider expanded flood risk zones due to climate change.

In **conclusion**, it is not possible to differentiate between the growth scenarios, with any certainty, in respect of flood risk. Nor is it possible to differentiate in respect of wider climate change adaptation considerations. Strategic growth locations can give rise to an opportunity to masterplan and design with climate change adaptation as a priority consideration (e.g. with a focus on avoiding overheating risk, and achieving high standards of water efficiency); however, it is not considered appropriate to differentiate between growth scenarios on this basis.

With regards to **significant effects**, there is a need to recall the package of proposed allocations that are a 'constant' across the growth scenarios, which does include some sites that give rise to a degree of concern from a flood risk perspective, most notably Stafford Station Gateway (see discussion in Section 9). On this basis, there is a need to flag 'moderate or uncertain' negative effects across all eleven scenarios.

Climate change mitigation

1: Gnosall, Hixon and Weston	2: Hixon Airfield	3: Beacon Hill	4: Hixon Airfield and Gnosall	5: Beacon Hill and Gnosall	6: Meecebrook	6a: Meecebrook and CRE02 (emp)	7: Meecebrook and Gnosall	7a: Meecebrook, Gnosall and CRE02	8: Meecebrook and Beacon Hill	8a: Meecebrook, Beacon Hill and CRE02
5	3	3	4	4	1	1	3	3	2	2

As discussed in Section 5.2 of this report, strategic growth locations can give rise to an opportunity to minimise per capita greenhouse gas emission from the built environment.

Beginning with consideration of the **strategic site options** that are a primary variable across the alternatives, these can be placed in the following order of preference on the basis of the discussion presented in Appendix IV: 1) Meecebrook; and 2) Hixon Airfield and Beacon Hill (Stafford).

With regards to the variable **package of smaller sites** at Gnosall, Hixon and Weston, as smaller sites there would be relatively limited potential to take an ambitious approach to minimising built environment emissions, e.g. seeking to go beyond the requirements of Building Regulations in respect of operational emissions or supporting modern methods of construction in order to minimise non-operational emissions (e.g. embodied emissions).

With regards to the matter of **growth quantum**, the key point to note is that climate change mitigation / decarbonisation is a global issue, such that the focus must be on per-capita emissions, as opposed to total emissions within any given geographical area (e.g. Stafford Borough). As such, it is not possible to conclude that lower growth scenarios are preferable, albeit under lower growth scenarios it could prove easier to achieve the Borough's 2040 net zero target.

Finally, with regards to the question of allocating a large new employment site as a 31.2 ha extension to Redhill Business Park (**CRE02**), there is a need to consider implications for the balance of housing and employment growth locally, with a view to avoiding 'unsustainable' commuting patterns, as has been discussed (and as discussed further below).

In **conclusion**, the primary consideration is support for directing growth to strategic sites, and larger strategic sites in particular. Meecebrook is considered to represent a clear opportunity, from a decarbonisation perspective. However, there is a need for further work to demonstrate why the site is an appropriate location to focus strategic growth, from a decarbonisation perspective, and explain how decarbonisation objectives fit with the scheme vision, masterplanning principles etc. There is also a need for further work on viability to understand tensions between decarbonisation objectives and wider objectives, e.g. transport and infrastructure.

With regards to **significant effects**, there is a need to recall the package of proposed allocations that are a 'constant' across the growth scenarios, which does include a number of smaller sites not likely to be associated with any particular opportunity, from a built environment decarbonisation perspective. There is a need to gauge performance in the context of the Borough's ambitious target of achieving net zero greenhouse gas emissions by 2040, which is a fairly ambitious target (albeit it is quite common for local authorities to set 2030 as a net zero target date). In turn, there is a need for a high level of ambition. In this light, it is judged to flag a significant concern with those scenarios that would not make the most of the decarbonisation opportunity associated with strategic growth locations.

Communities

1: Gnosall, Hixon and Weston	2: Hixon Airfield	3: Beacon Hill	4: Hixon Airfield and Gnosall	5: Beacon Hill and Gnosall	6: Meecebrook	6a: Meecebrook and CRE02 (emp)	7: Meecebrook and Gnosall	7a: Meecebrook, Gnosall and CRE02	8: Meecebrook and Beacon Hill	8a: Meecebrook, Beacon Hill and CRE02
3	2	2	2	2	1	1	1	1	1	1

As discussed in Appendix IV, key considerations relate to access to community infrastructure, perhaps most notably education infrastructure.

Beginning with consideration of the **strategic site options** that are a primary variable across the alternatives, these can be placed in the following order of preference on the basis of the discussion presented in Appendix IV: 1) Meecebrook; and 2) Beacon Hill (Stafford) and Hixon Airfield.

With regards to the variable **package of smaller sites**, it is understood that the site at Gnosall would deliver / facilitate an expansion to the primary school; however, none of the other three sites would be likely to deliver or facilitate significant new community infrastructure, and so could serve to increase pressure on local community infrastructure. With regards to the site at the northeast edge of Hixon, a small supermarket has recently been delivered adjacent, but there is little reason to suggest that allocation of the site in question could support delivery of a new community hub in this area. The site is also more than 1 km from the village primary school. A further key consideration is the potential to fund expansion of Weston Road Academy, which serves both Hixon and Weston. The school has capacity to expand to accommodate circa 2,000 homes, and so there is considerable uncertainty regarding whether growth ~300 homes, across the three potential allocations under consideration here, would enable expansion of the school. Also, expansion would likely lead to reduced space for bus pick up / drop off, such that there is a strong argument for ensuring that any further housing growth (up to 2,000 homes) is at a location within walking distance.

With regards to the matter of **total housing growth quantum**, it is difficult to draw strong conclusions, other than in respect of meeting housing needs, which is a matter that is a focus of stand-alone discussion above.

In **conclusion**, the key consideration is that Meecebrook represents a significant opportunity, and there is also potentially a notable opportunity to deliver new community infrastructure at Hixon to the benefit of the wider village, although there could also be negative effects felt by the existing community, and the secondary school issue is potentially a concern. With regards to Beacon Hill, the possibility to make land available for a secondary school is noted, also the proposed large country park, plus the site benefits from relatively good connectivity to the Stafford. With regards to the package of smaller sites that are a variable across the alternatives, the potential for expansion of Gnosall to deliver or facilitate a primary school expansion is noted, but it is not clear if the effect would be to address an existing capacity shortfall.

With regards to **significant effects**, there is a need to recall the package of proposed allocations that are a 'constant' across the growth scenarios, which does include some sites with the potential to deliver community benefits, perhaps most notably Stafford Station Gateway; however, the only sites with the potential to deliver new strategic community infrastructure are those that are a variable across the growth scenarios. On balance, it is considered to predict 'moderate or uncertain' significant positive effects for those scenarios involving allocation of Meecebrook. There will be clear potential to upgrade this conclusion to 'significant positive effects' ahead of plan finalisation, in light of further work.

Economy and employment

1: Gnosall, Hixon and Weston	2: Hixon Airfield	3: Beacon Hill	4: Hixon Airfield and Gnosall	5: Beacon Hill and Gnosall	6: Meecebrook	6a: Meecebrook and CRE02 (emp)	7: Meecebrook and Gnosall	7a: Meecebrook, Gnosall and CRE02	8: Meecebrook and Beacon Hill	8a: Meecebrook, Beacon Hill and CRE02
4	3	4	3	4	2	1	2	1	2	1

Beginning with consideration of the **strategic site options** that are a primary variable across the alternatives, these can be placed in the following order of preference on the basis of the discussion presented in Appendix IV: 1) Meecebrook; 2) Hixon Airfield; and 3) Beacon Hill (Stafford). This reflects the potential to deliver new employment land.

With regards to the variable **package of smaller sites** at Gnosall, Hixon and Weston, the primary point to note is that none would deliver new employment land. A further point to note is that there is currently little or no employment land at Gnosall, whilst there is extensive employment land in the vicinity of Hixon and Weston.

With regards to the matter of **growth quantum**, there are economic arguments for delivering significant new employment land through the local plan, reflecting high demand over recent years. However, the economy is potentially set to slow significantly, and employment land needs will be reviewed through a new EHDNA subsequent to the current consultation.

In **conclusion**, on the basis of current available evidence, namely the EHDNA (2020) and high-level understanding regarding the risk of unmet needs from elsewhere, there is clear support for allocating new employment land through the local plan, and allocating CRE02 (an extension to the successful Redhill Business Park) and Meecebrook in particular.

With regards to **significant effects**, there is a need to recall the package of proposed allocations that are a 'constant' across the growth scenarios, which does include one new employment allocation. In this light, all of the growth scenarios are supported, and there is particular support for those that would allocate significant additional new employment land.

Health and wellbeing

1: Gnosall, Hixon and Weston	2: Hixon Airfield	3: Beacon Hill	4: Hixon Airfield and Gnosall	5: Beacon Hill and Gnosall	6: Meecebrook	6a: Meecebrook and CRE02 (emp)	7: Meecebrook and Gnosall	7a: Meecebrook, Gnosall and CRE02	8: Meecebrook and Beacon Hill	8a: Meecebrook, Beacon Hill and CRE02
=	=	=	=	=	=	=	=	=	=	=

Beginning with consideration of the **strategic site options** that are a primary variable across the alternatives, these can be placed in the following order of preference on the basis of the discussion presented in Appendix IV: 1) Meecebrook; and 2) Hixon Airfield and Beacon Hill (Stafford)l. This reflects development scale/ambition and locational opportunities.

With regards to the variable **package of smaller sites** at Gnosall, Hixon and Weston, there are certain 'health and wellbeing' arguments in favour of directing growth to Gnosall, particularly as there is a GP surgery at the village and also the site in question is linked to Stafford by The Way for the Millennium cycle path, which might feasibly be the focus of some additional investment as a result of development.

In **conclusion**, there are clear arguments for supporting strategic growth locations over-and-above more piecemeal urban/village expansions. However, on balance it is judged appropriate to conclude that the alternative growth scenarios perform broadly on a par. Distinctions between the growth scenarios, in respect of 'health and wellbeing', are not as clear cut as is the case under other topic headings.

With regards to **significant effects**, there is a need to recall the package of proposed allocations that are a 'constant' across the growth scenarios, which does include certain sites associated with sensitivities, e.g. two sites at Stone in close proximity to a level crossing, where there is understood to be a need for further detailed discussions with Network Rail regarding suitability (see discussion in Section 9). Overall, there are wide ranging positives effects and potential tensions, mindful of the wide range of health determinants, but significance is potentially somewhat limited.

Historic environment

1: Gnosall, Hixon and Weston	2: Hixon Airfield	3: Beacon Hill	4: Hixon Airfield and Gnosall	5: Beacon Hill and Gnosall	6: Meecebrook	6a: Meecebrook and CRE02 (emp)	7: Meecebrook and Gnosall	7a: Meecebrook, Gnosall and CRE02	8: Meecebrook and Beacon Hill	8a: Meecebrook, Beacon Hill and CRE02
3	1	1	1	1	2	2	2	2	2	2

Beginning with consideration of the **strategic site options** that are a primary variable across the alternatives, these can be placed in the following order of preference on the basis of the discussion presented in Appendix IV: 1) Hixon Airfield and Beacon Hill (Stafford); and 2) Meecebrook.

With regards to the variable **package of smaller sites** at Gnosall, Hixon and Weston, the primary consideration is the location of the Weston site adjacent to the Trent and Mersey Canal Conservation Area. However, the towpath along this stretch is not a formal public right of way, and there could well be a need / opportunity to deliver new greenspace or landscaping to buffer the canal corridor (albeit it is recognised that an agricultural setting may be an important defining feature of the conservation area).

With regards to Hixon, neither site gives rise to significant concerns, although the northern site is adjacent to and visible from one of the main historic routes through the village, and there are views across the southern site to the grade 2 listed parish church (discussed further under 'landscape'). Also, Uttoxeter-bound traffic from Hixon passes through Stowe-by-Chartley, where there is a valued historic core including a grade 2* listed church.

With regards to Gnosall, it is important to recall that the site under consideration here, as a variable across the scenarios, would be screened from the conservation area by site GNO04 (west), which is a 'constant' across the scenarios. In turn, the primary concern is potentially in respect of a nearby (north of the A518) non-designated moated site.

Finally, with regards to the question of allocating a large new employment site as a 31.2 ha extension to Redhill Business Park (**CRE02**), there are no apparent concerns regarding impacts to a designated asset. However, the Historic Environment Record (HER) indicates that two of the fields within the site are associated with ridge and furrow.

In **conclusion**, there is support for growth at Hixon Airfield (in particular) and Beacon Hill, from a historic environment perspective, and there is also an argument for scenarios including Meecebrook, as this area is subject to relatively limited historic environment constraint, in the context of new settlement options of this scale (subject to further investigation, e.g. in respect of traffic flows through Eccleshall), and allocation could well lead to flexibility to provide for unmet needs, thereby potentially reducing development pressure on locations elsewhere in the sub-region that are highly constrained.

With regards to **significant effects**, there is a need to recall the package of proposed allocations that are a 'constant' across the growth scenarios, which includes certain sites associated with a degree of historic environment constraint (see discussion in Section 9), including the aforementioned site south of Gnosall. On balance, it is considered appropriate to flag 'moderate or uncertain' negative effects only for Scenario 1, given concerns in respect of significant growth in proximity to two conservation areas (Gnosall and Trent and Mersey Canal). However, it is recognised that 'moderate or uncertain' negative effects could alternatively be the conclusion across all the scenarios. There will be the potential for further work to understand how historic environment sensitivities can be avoided and mitigated (e.g. through masterplanning, design and landscaping) taking account of comments received from Historic England.

Housing

1: Gnosall, Hixon and Weston	2: Hixon Airfield	3: Beacon Hill	4: Hixon Airfield and Gnosall	5: Beacon Hill and Gnosall	6: Meecebrook	6a: Meecebrook and CRE02 (emp)	7: Meecebrook and Gnosall	7a: Meecebrook, Gnosall and CRE02	8: Meecebrook and Beacon Hill	8a: Meecebrook, Beacon Hill and CRE02
6	5	5	4	4	3	3	2	2	1	1

Beginning with consideration of the **strategic site options** that are a primary variable across the alternatives, these can be placed in the following order of preference on the basis of the discussion presented in Appendix IV: 1) Meecebrook; and 2) Hixon Airfield and Beacon Hill (Stafford).

With regards to the variable **package of smaller sites** at Gnosall, Hixon and Weston, as 'medium' sized sites these have the benefit of being associated with relatively low delivery risk, and would likely be able to come forward early in the plan period, plus there is good confidence regarding the potential to deliver the full policy quota of affordable housing. It is also noted that the site at Gnosall is in public sector ownership, which should assist in this respect. However, none of these three villages stand-out as being likely to be associated with a locally arising housing need, with Hixon in particular having seen relatively high housing growth over recent years (24.7% increase in dwelling stock over 2011-22).

With regards to the matter of **growth quantum**, there is clear support for higher housing growth scenarios, from a 'housing' perspective. All of the growth scenarios would allow the housing requirement to be set at LHN (391 dpa); however, higher growth scenarios would enable:

- the housing requirement to be set at a higher figure; and/or
- involve a supply buffer over-and-above the housing requirement (see Section 5.4) that is more than sufficient (for its purpose of ensuring that the housing requirement is met in practice, across the plan period, thereby avoiding the risk of failing the Housing Delivery Test at any point, or failing to demonstrate a five year housing land supply), such that there would be flexibility (or 'headroom') to provide for a proportion of unmet needs arising from one or both of the highly constrained urban areas (both surrounded by a Green Belt) to the north and south of the borough.

Reasons for potentially setting the housing requirement at a figure above LHN are discussed in Section 5.2, and primarily relate to supporting economic/employment growth, and ensuring a balance between housing and employment growth locally (in order to avoid unsustainable commuting patterns) more so than responding to demographic needs. However, a strong 'housing' argument for setting the housing requirement at a figure above LHN relates to affordable housing. As discussed in Section 5.2, the EHDNA (2020) found that: *"Affordable housing need is in the range between 252 and 389 affordable homes per annum between 2020 to 2040 which represents a significant proportion of the LHN…"*

With regards to unmet needs, the simple fact is that these are extensive, but there is also a need to account for the contribution from other LPAs, which is not something that can be easily done (in the absence of a sub-regional tier of planning). In this light, there is a need to place weight on the question of whether there are locations for strategic growth within the borough that are well placed to provide for unmet needs, and in the case of Stafford Borough this potentially applies strongly to a new garden community at Meecebrook, given the potential to deliver a new railway station, and given the potential for a new junction onto the M6.

In **conclusion**, there is a clear need to place the growth scenarios in an order of preference according to total quantum.

With regards to **significant effects**, it is difficult to draw a conclusion. On balance, significant positive effects are predicted only for those scenarios that would *both* enable the housing requirement to be set at a figure above LHN (435 dpa is a figure that has been discussed) and enable some provision for unmet needs. However, even under the lowest growth scenario, it is not possible to predict negative effects, as there would still be the potential to set the housing requirement at a figure above LHN, which amounts to a proactive approach to housing supply, in the national context.

Land, soil and natural resources

1: Gnosall, Hixon and Weston	2: Hixon Airfield	3: Beacon Hill	4: Hixon Airfield and Gnosall	5: Beacon Hill and Gnosall	6: Meecebrook	6a: Meecebrook and CRE02 (emp)	7: Meecebrook and Gnosall	7a: Meecebrook, Gnosall and CRE02	8: Meecebrook and Beacon Hill	8a: Meecebrook, Beacon Hill and CRE02
2	1	1	2	2	2	2	2	2	2	2

A foremost consideration here is the need to avoid the loss of agricultural land classed as 'best and most versatile' (BMV), which the NPPF defines as that which is grade 1 (highest quality), grade 2 or grade 3a.

Beginning with consideration of the **strategic site options** that are a primary variable across the alternatives, these can be placed in the following order of preference on the basis of the discussion presented in Appendix IV: 1) Beacon Hill (Stafford) and Hixon Airfield; 2) and Meecebrook.

With regards to the variable **package of smaller sites** at Gnosall, Hixon and Weston, none of the sites in question have been surveyed in detail (using 'post 1988 criteria', as understood from the dataset available at magic.gov.uk), whilst the low resolution nationally available 'provisional' dataset shows: land south of Gnosall to be associated with grade 2 quality land (i.e. land that that is likely to be 'BMV in practice); and land at Weston and Hixon to be associated with grade 3 quality land, which may (grade 3a) or may not be (grade 3b) BMV. All of the sites are currently used for agriculture.

With regards to the matter of **total housing growth quantum**, there is *perhaps* a high level argument for providing for higher growth in Stafford Borough in order to reduce the pressure on locations elsewhere in the sub-region. In particular, it is noted that the nationally available dataset shows somewhat limited grade 2 quality land in the central and eastern parts of the borough (which is where growth options are primarily concentrated), relative to certain other areas that might come into contention as locations to make provision for unmet needs, notably South Staffordshire and Lichfield Districts.

Finally, with regards to the question of allocating a large new employment site as a 31.2 ha extension to Redhill Business Park (**CRE02**), there is a high likelihood of this land comprising BMV agricultural land, on the basis that: the land is shown by the nationally available provisional dataset to comprise grade 3 land; the national dataset shows there to be grade 2 quality land nearby; and land adjacent to the east has been surveyed in detail and found to be mostly grade 3a.

In **conclusion**, it is a challenge to place the alternatives in an order of preference. There is potentially a degree of support for directing growth to Hixon Airfield or Beacon Hill, from a perspective of seeking to minimise loss of BMV agricultural land. However, there is also an argument for supporting higher growth, albeit somewhat tenuous, as discussed. On balance, the alternatives are ranked in order to reflect the former argument.

With regards to **significant effects**, there is a need to recall the package of proposed allocations that are a 'constant' across the growth scenarios, which does include some sites that are likely to comprise BMV agricultural land. In this light, it is appropriate to predict 'moderate' negative effects under all scenarios, given the likelihood of a quantum of agricultural land being lost to development that might be considered significant.

N.B. a further consider is sterilisation of minerals resources – see discussion in Appendix IV.

Landscape

1: Gnosall, Hixon and Weston	2: Hixon Airfield	3: Beacon Hill	4: Hixon Airfield and Gnosall	5: Beacon Hill and Gnosall	6: Meecebrook	6a: Meecebrook and CRE02 (emp)	7: Meecebrook and Gnosall	7a: Meecebrook, Gnosall and CRE02	8: Meecebrook and Beacon Hill	8a: Meecebrook, Beacon Hill and CRE02
2	1	4	1	4	3	3	3	3	5	5

Beginning with consideration of the **strategic site options** that are a primary variable across the alternatives, these can be placed in the following order of preference on the basis of the discussion presented in Appendix IV: 1) Hixon Airfield; 2) Meecebrook; and 3) Beacon Hill (Stafford).

With regards to the variable **package of smaller sites** at Gnosall, Hixon and Weston:

- An immediate consideration is the location of the Weston site adjacent to the Trent and Mersey Canal Conservation Area, but this is potentially more of a historic environment / heritage consideration (discussed above) than a landscape consideration. In landscape terms, on the one hand the site benefits from very strong defensible boundaries (and it is anticipated that significant green infrastructure would be delivered within the site, as it could not be developed in full given capacity at the village primary school); however, on the other hand, there are clear views across the site (subject to hedgerow height) towards prominent woodlands on the opposite side of the river valley, as experienced from the A51 on the approach to Weston.
- With regards to the southern site at Hixon, the site to the south benefits from a degree of containment, given the recent development to the south; however, there is a footpath adjacent to the site, and there are sensitive views across the site from Egg Lane. Specifically, the view is of the historic parish church (with a prominent spire, albeit only grade 2 listed) in the foreground with the backdrop being a long distance view across the Trent River valley to wooded hills beyond. However, Egg Lane is a 'no through road' likely used by cyclists and walkers more so than traffic, and it is also noted that Egg Lane is raised above the site, which could assist with retaining views of the church.
- The other site at Hixon is arguably less well related to the settlement edge, and there are long distance views across the site (subject to hedgerow height) from Lea Road, and also likely from the adjacent public footpath. Overall, the landscape sensitivity of this site is judged to be similar to that of the site to the south.
- With regards to Gnosall, a larger site encompassing the site currently under consideration is discussed in Appendix IV. Overall the landscape sensitivity here is considered to be relatively limited, and this smaller site would benefit from being able to draw upon the Way for the Millennium cycle path as a (somewhat) defensible boundary.

With regards to the matter of **growth quantum**, it is not possible to suggest, with any confidence, that higher growth scenarios are supported because the effect would be to reduce pressure on more sensitive areas elsewhere in the sub-region. For example, and in particular, there is no reason to assume that there is or could be pressure to provide for unmet needs from Birmingham and the Black Country within, or within the setting of, Cannock Chase AONB. Broadly speaking, there are landscape sensitivities associated with the main transport corridors in the borough – i.e. the locations that come into consideration as locations potentially appropriate in respect of providing for unmet needs – because they are associated with river valleys and historic settlement. However, that is not to say the borough is unique in this respect.

A related consideration is providing for a proportion of unmet needs in order to minimise pressure on one or both of the **Green Belts** intersecting the borough. However, it is difficult to conclude that this is a 'landscape' consideration.

Finally, with regards to the question of allocating a large new employment site as a 31.2 ha extension to Redhill Business Park (**CRE02**), the site itself potentially gives rise to limited landscape concerns, given the site nearing completion to the east and the M6 to the west, but there is a general concern regarding the northwards 'sprawl' of Stafford. The southern extent of the site is associated with the Bullockcroft Brook, but then the land rises to a highpoint in the north (where the M6 passes through a cutting), such that there will be a landscape argument for containing the site, and the northern edge of Stafford, to the south of this high point. It is noted that land nearby to the east, specifically to the A34 does not have the benefit of being able to draw upon this area of raised land for containment, but instead descends to the valley of the Marston Brook, with Marston Lane (a national cycle route) and the Stone Circles Challenge footpath beyond.

In **conclusion**, there is support for Hixon Airfield, a concern with Beacon Hill (in particular) and Meecebrook, and also a degree of concern with the smaller sites under consideration at Hixon and Weston. On balance, scenarios involving CRE02 are not judged to perform worse than those without, but there is uncertainty in this respect.

With regards to **significant effects**, there is a need to recall the package of proposed allocations that are a 'constant' across the growth scenarios, which does include some sites that are associated with a degree of landscape sensitivity. On balance, it is considered to predict negative effects on the baseline (which, to reiterate, is one whereby there is continued development pressure locally, and increased development pressure elsewhere in the sub-region given unmet housing needs) for those scenarios other than those that would support Hixon Airfield as the primary local plan allocation.

Transportation

1: Gnosall, Hixon and Weston	2: Hixon Airfield	3: Beacon Hill	4: Hixon Airfield and Gnosall	5: Beacon Hill and Gnosall	6: Meecebrook	6a: Meecebrook and CRE02 (emp)	7: Meecebrook and Gnosall	7a: Meecebrook, Gnosall and CRE02	8: Meecebrook and Beacon Hill	8a: Meecebrook, Beacon Hill and CRE02
4	3	3	3	3	2	2	2	2	1	1

Beginning with consideration of the **strategic site options** that are a primary variable across the alternatives, the conclusion of the appraisal presented in Appendix IV is that all three sites are associated with significant uncertainties at this stage in the process, such that it is not possible to differentiate between them with any confidence.

With regards to the variable **package of smaller sites** at Gnosall, Hixon and Weston: Gnosall is the preferable location, from a transport perspective, given a more frequent bus service and also good potential to cycle to Stafford; however, there are concerns regarding north south connectivity, as discussed in Appendix IV. Hixon, in particular, is not well located on the strategic road network, and there is limited potential to cycle to Stafford.

With regards to the matter of **growth quantum**, there is currently no evidence to suggest that higher growth scenarios would lead to severe traffic impacts, although noting that the key sites in question do not share road corridors. In turn, the key consideration is a need to support unmet needs from the neighbouring constrained major urban areas being met as close to source as possible, and in the most 'sustainable' locations from a transport perspective.

Finally, with regards to the question of allocating a large new employment site as a 31.2 ha extension to Redhill Business Park (**CRE02**), the site is thought likely to be an appropriate location for employment growth from a transport perspective, including mindful of likely HGV traffic. This is on the basis that the site is linked to the M6 by the A34 duel carriageway; however, National Highways will wish to comment further in detail.

In **conclusion**, the key consideration here is judged to be supporting higher growth scenarios, such that there is flexibility to provide for unmet needs, subject to a decision on what the housing requirement should be (in order to reflect locally arising needs and market signals). Gnosall is not considered to be a strongly performing location from a perspective of meeting unmet needs, but otherwise is associated with a degree of merit in transport terms. Beacon Hill is thought to be a preferable location to Hixon Airfield, in respect of meeting unmet needs, but is associated with transport challenges, particularly given MOD and employment land forming a barrier to movement between the site and Stafford.

With regards to **significant effects**, there is a need to recall the package of proposed allocations that are a 'constant' across the growth scenarios, which give rise to a range of 'transport' issues, for example: Stafford Station Gateway (strongly supported); Land at Ashflats (some way distant from Stafford town centre, but well connected to Birmingham and the Black Country); and Woodseaves (a rural settlement, distant from higher order centres). On balance, 'moderate or uncertain' positive effects are predicted under scenarios that would almost certainly lead to flexibility to provide for unmet needs; however, all of the scenarios are associated with major uncertainties ahead of further detailed work.

Water

1: Gnosall, Hixon and Weston	2: Hixon Airfield	3: Beacon Hill	4: Hixon Airfield and Gnosall	5: Beacon Hill and Gnosall	6: Meecebrook	6a: Meecebrook and CRE02 (emp)	7: Meecebrook and Gnosall	7a: Meecebrook, Gnosall and CRE02	8: Meecebrook and Beacon Hill	8a: Meecebrook, Beacon Hill and CRE02
4	3	3	3	3	2	2	2	2	1	1

Beginning with consideration of the **strategic site options** that are a primary variable across the alternatives, these can be placed in the following order of preference on the basis of the discussion presented in Appendix IV: 1) Meecebrook; 2) Beacon Hill (Stafford); and 3) Hixon Airfield. N.B. there is considerable uncertainty at this stage.

With regards to the variable **package of smaller sites** at Gnosall, Hixon and Weston, there is little reason to suggest any particular water-related constraint to modest growth in these areas. However, there are clear water-related arguments for strategic growth, with Severn Trent Water stating the following through consultation in 2020:

> *"Whilst lacking specific locations and detail, generally speaking; string settlement clusters and wheel settlement clusters are unfavourable. This is because although they appear to be individual and separate settlements more often their infrastructure is a single system..."*
>
> *"Urban extensions and intensification around the edge of larger settlements allows us to focus our efforts on a specific region. Larger settlements often have some capacity which can be released by implementing long term strategic aspirations and can help us reshape our existing systems for the better. Occasionally they do involve some major engineering challenges and therefore close collaboration is encouraged to ensure there is no delay to implementing enabling infrastructure."*
>
> *"New garden communities often require extensive amounts of new infrastructure and can pose major strategic challenges. That being said they also provide great opportunities to arrange infrastructure in an idealised way and with close collaboration on master planning and delivery they can be great ways to implement innovative systems."*

With regards to the matter of **growth quantum**, water resources / supply and water quality are increasingly recognised as key issues nationally, particularly mindful of climate change scenarios. However, at the current time there is limited evidence to suggest that Stafford Borough, or the wider sub-region, is subject to any particular constraints. A 'Phase 1' Water Cycle Study (WCS) was completed for the Southern Staffordshire local authorities, including Stafford Borough, in 2020; however, this was only an initial 'scoping' study. Focusing on wastewater treatment capacity, the following conclusion serves to highlight the inherent challenge in respect of proactive strategic planning for growth:

"Severn Trent scored a large number of WwTW red as part of their flow capacity RAG assessment; however, this was based on the 100% growth scenario, which is likely to be an overestimate of growth… Once the [councils] have confirmed which sites will be developed, and [Severn Trent Water, STW] have modelled the additional demand, where capacity is not currently available, STW will complete necessary improvements to provide the capacity… Further study of the wastewater treatment capacity is recommended as part of a Phase 2 Outline study as the Local Plans develop and the [councils] have greater certainty over which sites will be brought forward..."

In **conclusion**, there is support for Meecebrook, largely on account of the scale of the site and the established potential to achieve a high degree of sustainability ambition. However, there is a need to apply a degree of caution, as the available evidence base is skewed towards Meecebrook (further comments from the water company on the competing strategic site options would be welcomed at the current time). In this light, it is not considered appropriate to differentiate between the growth scenarios at this current stage.

With regards to **significant effects**, there is a need to recall the package of proposed allocations that are a 'constant' across the growth scenarios. None of the specific growth locations are known to be particularly problematic (Woodseaves warrants scrutiny, as a raised rural village), but there is a clear need to flag a 'moderate or uncertain' effects at this current stage, taking a precautionary approach ahead of consultation and potentially further technical work.

Appraisal summary

The table below present a summary of the appraisal of reasonable growth scenarios presented above.

The reasonable growth scenarios – summary appraisal findings

	1	2	3	4	5	6	6a	7	7a	8	8a
Scenario *Constants plus growth / higher growth at…*	Gnosall, Hixon and Weston	Hixon Airfield	Beacon Hill	Hixon Airfield and Gnosall	Beacon Hill and Gnosall	Meecebrook		Meecebrook and Gnosall		Meecebrook and Beacon Hill	
Topic	Rank of preference and categorisation of effects										
Air quality	3	3	1	3	2	1	3	2	3	1	2
Biodiversity	4	4	3	4	2	1	1	1	1	1	1
Climate change adaptation	=	=	=	=	=	=	=	=	=	=	=
Climate change mitigation	5	3	3	4	4	1	1	3	3	2	2
Communities	3	2	2	2	2	1	1	1	1	1	1
Economy	4	3	4	3	4	2	1	2	1	2	1
Health and wellbeing	=	=	=	=	=	=	=	=	=	=	=
Historic environment	3	1	1	1	1	2	2	2	2	2	2
Housing	6	5	5	4	4	3	3	2	2	1	1
Land	2	1	1	2	2	2	2	2	2	2	2
Landscape	2	1	4	1	4	3	3	3	3	5	5
Transport	6	5	4	3	3	2	2	2	2	1	1
Water	=	=	=	=	=	=	=	=	=	=	=

Discussion

A headline finding is that **higher growth scenarios** perform well, in absolute and / or relative terms, under the majority of those topics where it is possible to differentiate between the scenarios. This broadly reflects:

- support for directing growth to a large garden community at Meecebrook; and
- support for providing for unmet needs in broadly suitable locations, in the knowledge that the effect would be to reduce pressure on other locations elsewhere in the sub-region that could well be less suitable.

In contrast, **Scenario 1** is found to perform relatively poorly under all topics except for 'landscape', with no positive effects predicted, as it is the lowest growth scenario and would involve a package of smaller allocations, in place of a strategic growth location, leading to opportunities missed around infrastructure and wider 'planning gain'.

The appraisal findings in respect of Scenario 1 are such that it is fair to say that it is found to perform poorly overall, potentially to the extent that it is 'unreasonable'. However, focusing on **the other ten scenarios**, it is *not* fair to say that the appraisal finds higher growth scenarios to be preferable overall.[37]

Having made these initial points, the following bullet points consider each of the topic headings in turn:

- **Air quality** – the order of preference reflects: relative support for Beacon Hill, as an urban extension well connected to the strategic road network, albeit MOD and employment land is a barrier to connectivity; support for Meecebrook, as part of a strategy that leads to flexibility to provide for unmet needs; and the importance of balancing housing and employment growth locally, in order to avoid problematic levels of in-commuting (N.B. the latter is a complex topic area, with clarity anticipated following further work prior to plan finalisation).
- **Biodiversity** - the order of preference and conclusions on significant effects reflect: a concern with Hixon Airfield (also possibly growth at Weston), given proximity to an important wetland site; and support for providing for unmet needs in locations that give rise to relatively limited concerns, in the knowledge that this may reduce pressure on more sensitive locations elsewhere within the sub-region, e.g. close to Cannock Chase SAC. With regards to the six best performing scenarios, there is an argument for predicting positive effects on the baseline, given good net gain potential at strategic sites, and given identified opportunities at both Meecebrook (in particular) and Beacon Hill. However, there is much uncertainty at this early stage.
- **Climate change adaptation** - it is not possible to differentiate between the growth scenarios, with any certainty, in respect of flood risk. All three of the strategic site options are associated with river / stream valleys, but there is little reason to suggest that flood risk would create a major challenge to effective masterplanning, such that there could be pressure to accept any risk. Nor is it possible to differentiate in respect of wider adaptation factors (e.g. overheating risk), albeit there can be an opportunity at strategic sites. With regards to significant effects, there is a need to recall the package of proposed allocations that are a 'constant' across the scenarios, which include a notable site associated with flood risk (Stafford Gateway).
- **Climate change mitigation** – focusing on built environment emissions (with transport emissions a focus of discussion under other headings), the primary consideration is support for directing growth to strategic sites, and larger strategic sites in particular. Meecebrook is considered to represent a clear opportunity; however, there is a need for further work to demonstrate why the site is an appropriate location to focus strategic growth, from a decarbonisation perspective, and explain how decarbonisation objectives fit with the scheme vision, masterplanning principles etc. There is also a need for further work on viability to understand tensions between decarbonisation and wider objectives, e.g. affordable housing, transport and infrastructure. With regards to significant effects, there is a need to recall the package of proposed allocations that are a 'constant' across the growth scenarios, which includes smaller sites not likely to be associated with any particular built environment decarbonisation opportunity; and there is a need to gauge performance in the context of the Borough's ambitious target of achieving net zero greenhouse gas emissions by 2040, which is a fairly ambitious target (albeit it is quite common for local authorities to set 2030 as a net zero target date).
- **Communities** - the key consideration is that Meecebrook represents a significant opportunity, and there is also potentially a notable opportunity to deliver new community infrastructure at Hixon to the benefit of the wider village, although there could also be negative effects felt by the existing community, and there are challenges around secondary school provision. With regards to Beacon Hill, the possibility to make land available for a secondary school (yet to be confirmed) is noted, as is the proposed large country park, plus the site benefits from *relatively* good connectivity to the Stafford. With regards to the variable package of smaller sites, the potential for expansion of Gnosall to deliver a primary school expansion is noted.

[37] This is because the appraisal is undertaken without any assumptions made regarding the weight, or degree of importance in the decision making process, that should be assigned to each topic, nor is it fair to assume that the topics are of equal weight. The appraisal does serve to highlight concerns with higher growth, under certain topic headings, and the Council – as the decision-makers – might choose to assign particular weight to one or more of these in the 'planning balance'. Also, in respect of any given topic, it is important to recall that the appraisal is not a scientific exercise, in that it reflects a range of judgements.

With regards to significant effects, 'moderate or uncertain significant positive effects' are predicted for scenarios involving Meecebrook. There is clear potential to upgrade this conclusion ahead of plan finalisation.

- **Economy** - strong recent demand for / uptake of employment land, along with a risk of unmet needs from elsewhere, provides an argument for allocating new employment land through the local plan, including at sites that are a variable across the scenarios, including at a mixed use new settlement (Meecebrook or Hixon Airfield) and/or at CRE02 (an extension to the successful Redhill Business Park). However, there is uncertainty ahead of an update to the Economic and Housing Development Needs Assessment (EHDNA). In simple quantitative terms the current evidence suggests a risk of an over-supply, but there are a range of qualitative considerations, for example around shifts in jobs density / automation at warehousing sites.
- **Health and wellbeing** - there are clear arguments for supporting strategic growth locations over-and-above smaller urban extensions. However, on balance, the scenarios are judged to perform broadly on a par. With regards to significant effects, there are wide ranging positives effects and potential tensions, mindful of the wide range of health determinants, but significance is potentially somewhat limited.
- **Historic environment** - there is support for growth at Hixon Airfield (in particular) and Beacon Hill, and there is also an argument for scenarios including Meecebrook, as this area is subject to relatively limited historic environment constraint in the context of new settlement options of this scale (subject to further investigation, e.g. in respect of traffic through Eccleshall), plus allocation could potentially serve to reduce development pressure on constrained locations elsewhere sub-regionally. With regards to significant effects, on balance, it is considered appropriate to flag 'moderate or uncertain' negative effects only for Scenario 1, given concerns in respect of growth close to two conservation areas (Gnosall and the Trent and Mersey Canal).
- **Housing** - there is a clear need to rank the growth scenarios according to total quantum. With regards to significant effects, on balance, significant positive effects are predicted for those scenarios that would enable provision for unmet needs in quantitative terms, although there is also a need to consider whether growth locations would be suited to meeting unmet needs, in transport connectivity terms. Even the lowest growth scenario potentially represents a proactive approach, as the housing requirement would be set at a figure above the standard method-derived Local Housing Need (LHN), leading to additional delivery of affordable housing to meet identified needs.
- **Land** – there is a degree of support for directing growth to Hixon Airfield or Beacon Hill, from a perspective of seeking to minimise loss of Best and Most Versatile (BMV) agricultural land. However, there is also an argument for supporting higher growth, given concentrations of BMV land elsewhere in the sub-region. With regards to significant effects, the quantum of agricultural land lost to development could be judged significant.
- **Landscape** – on balance higher growth is judged to give rise to a concern, albeit the effect would certainly be to reduce pressure on one or both of the sub-region's Green Belts. There is support for Hixon Airfield, a concern with Beacon Hill (in particular) and Meecebrook, and also a degree of concern with smaller sites at Hixon and Weston. On balance, scenarios involving CRE02 are not judged to perform worse than those without, but there is some uncertainty. With regards to significant effects, there is a need to recall the package of proposed allocations that are a 'constant' across the growth scenarios, which includes some associated with a degree of sensitivity. On balance, it is appropriate to predict negative effects on the baseline (which, to reiterate, is one whereby there is continued development pressure locally, and increased development pressure elsewhere in the sub-region given unmet housing needs) for those scenarios without Hixon Airfield.
- **Transport** - the key consideration here is judged to be supporting higher growth scenarios, such that there is flexibility to provide for unmet needs (subject to a decision on locally arising needs, including to reflect market signals). Gnosall is not considered to be a strongly performing location from a perspective of meeting unmet needs, but otherwise is associated with a degree of merit, including a good bus service. Beacon Hill is judged preferable to Hixon Airfield, but has its transport challenges. With regards to significant effects, there is a need to recall the 'constant' allocations, for example: Stafford Station Gateway (strongly supported); Land at Ashflats (well connected to the M6, but less so Stafford town centre); and Woodseaves (a rural settlement, distant from higher order centres). On balance, 'moderate or uncertain positive effects' are predicted under scenarios that would lead to clear potential to provide for unmet needs; however, all of the scenarios are associated with uncertainties at this stage, e.g. with limited transport modelling having been completed.
- **Water** - there is support for strategic schemes, and larger strategic schemes in particular, which suggests a degree of support for Meecebrook, plus there may be a degree of locational opportunity, noting association with the Meece Brook. However, it is too early to conclude support for Meecebrook with any certainty, ahead of further evidence-gathering and discussions with the water company and the Environment Agency. With regards to significant effects, there is a clear need to flag 'moderate or uncertain negative effects' at this current stage, taking a precautionary approach ahead of consultation and further work, including potentially a detailed water cycle study to update the scoping study completed in 2020. It is recognised that good management of water resources and water quality is high on the national agenda at the current time, including from a climate change resilience perspective.