

Burleyfields: Evidence report

ON BEHALF OF Taylor Wimpey/Bellway/St Modwen

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1. Introduction

- 1.1. Savills is instructed by Taylor Wimpey, St Modwen and Bellway to provide a report to Stafford Borough Council in response to its request for evidence to support the Stafford West Strategic Development Location identified in the draft Plan for Stafford Borough. This report summarises the evidence base collated by the three parties and the evidence collected by Stafford BC. It also identifies areas for further work through the Development Team. The report structure follows that list of items identified by SBC as being required
- 1.2. The area covered by this report is shown in Figure 1. It covers land being promoted for development by Taylor Wimpey, St Modwen and Bellway. The area covered by Policy 5 of the draft Plan for Stafford also includes land owned by Lord Stafford, currently leased to Stafford Rugby Union Football Club. Elements of this evidence report are applicable to this land, but the report does not include reference to any specific reports having been undertaken in relation to this land.

2. Masterplan & Phasing

- 2.1. In April 2009 Taylor Wimpey submitted a Development Framework Document to SBC to support the identification of a western direction of growth to the town. That DFD included an illustrative concept plan for the land being promoted by Taylor Wimpey. A planning application for residential development has been submitted by St Modwen on part of its landholdings at Castle Works. Further design and layout work in relation to the various landholdings has not been undertaken.
- 2.2. A Development Team has been established with the local authorities, to work in partnership to deliver development at Burleyfields. As part of that, it has been agreed to engage with the local community over the masterplanning of Burleyfields. It is expected that the approach to phasing will develop out of the masterplanning and engagement exercises.

3. Strategic Landscaping

- 3.1. SBC's evidence base includes two reports of relevance, a *Historic Environment Character Assessment for Stafford Town* (April 2009) and *Landscape and Countryside Character Assessment*. That work is supplemented by further detailed work by EDP in the form of an Archaeological Desk-Based and a Landscape and Visual Amenity Assessment.
- 3.2. The site comprises a mix of greenfield and previously developed land. These areas have distinctly different characteristics. On the edge of the urban area the previously developed land includes land around Stafford Rugby Club and major industrial buildings at the Castleworks site and St Gobain, some buildings are vacant and some remain in use and these are strongly urbanising features.
- 3.3. The greenfield land west of Stafford is not designated for its landscape value and there are no nationally designed landscapes within or in close proximity to the site. The Cannock Chase Area of Outstanding Natural Beauty (AONB) lies more than 5.5km to the south west of the site. There is no inter-visibility between the site and the AONB.
- 3.4. The greenfield area west Stafford falls within Natural England's *Shropshire, Cheshire and Staffordshire Plain* National Landscape Character Area (NCA 61). This character area is described as a gently rolling landscape with gentle changes of elevation of between 20 and 50 metres; farming is mixed and field sizes range from small to medium with an irregular field pattern; field boundaries are usually defined by hedgerows with hedgerow trees which are mainly Oak; small ponds are scattered throughout the plain; meres and mosses are described as being widespread local features.
- 3.5. The Staffordshire Landscape Character Assessment identifies the area as predominantly *settled farmlands*, although with a small area of categorised as *Ancient clay farmlands*.
- 3.6. The *Settled Farmlands* are described as being an undulating landscape with occasional, prominent high points. The land use is mainly mixed arable and pastoral farmland; in some areas intensive farming practises have resulted in the deterioration of the medium scale field pattern and a loss of landscape structure. The interaction between tree and hedgerow density and the undulating landform leads to local variation in the available views, from medium to long distance panoramic views.
- 3.7. The northern part of the site lies within the *Ancient Clay Farmlands*. The description of this landscape character type reflects that of the *Settled Farmlands* having a gently undulating topography with a declining landscape structure in some areas brought about by the intensification of agricultural practices. Unlike the settled farmlands, meres, brooks and associated areas of alders and willow are described as being important landscape elements. Major road corridors are recognised as having a significant localised effect.
- 3.8. EDP conducted a more detailed landscape and visual assessment of the area. That assessment identified that:
 - as a consequence of its sloping topography, the area faces existing urban development within Stafford and has a strong visual association with the town;
 - the M6 and its associated embankment, create both a visual and physical boundary to urban influences on landscape character to the west of Stafford and is an important feature containing the urbanising influences of the town;
 - in general, the landscape fabric within the area is in relatively poor condition; numerous hedgerows have been lost or degraded, probably as a result of modern arable agricultural practises and lack of appropriate management;
 - a small number of features within the area are worthy of retention, including the double hedgerow associated with the public right of way and two small wooded copses;
 - there is the opportunity to improve the structure and quality of the landscape fabric;

- in views towards the area from the south and west, for example from Stafford Castle and footpaths, existing residential and commercial development in Stafford is a clearly visible part of the existing view;
- the majority of views of the area from Stafford Castle are filtered by the surrounding 'Castle Woods'. Where there are gaps in vegetation, there are partial views of the area, however, existing urban development forms a noticeable proportion of the view from this elevated viewpoint;
- Stafford Castle and the castle mound are a prominent local landmark and are frequently seen in local views, and development proposals should ensure that views of Stafford Castle are maintained;
- in views from the north, including for users of Stafford Common and from the open countryside views of the area are seen within the context of existing development in Stafford;
- views from the west, from public rights of way and from the settlements of Aston and Derrington, are often restricted by the embankment of the M6 and associated vegetation, however, there are occasional views of small parts of the area;
- there are partial views of the area from Berry Ring (Scheduled Ancient Monument) however, these existing views include a substantial proportion of urban development in Stafford.
- there are glimpsed views of small parts of the area from the Doxey Marshes SSSI, only the highest areas of the site being occasionally visible.
- existing residential and commercial development [including within the proposed allocation] limits views of the area from many of the residential areas within Stafford

3.9. Overall, whilst the greenfield area is likely to have perceived local value as the remaining open undeveloped parcel of land inside the M6 corridor, the site has low intrinsic landscape quality, as recognised in Staffordshire County Council's landscape character assessment.

3.10. Based on EDP's analysis and:

- the undesignated status of the area,
- the low landscape sensitivity;
- the influence of the existing urban form, including industrial areas within the proposed allocation;
- that views of and across the site are often seen in the context of existing urban development, and
- the presence in the immediate vicinity of residential development

it is considered there are no 'in principle' landscape constraints to the development of the site. Indeed, the proposed allocation represents an opportunity to bring forward environmental/landscape improvement through the redevelopment previously developed land. A number of factors identified by EDP – as listed above – should inform masterplanning the area.

4 Green infrastructure

4.1. SBC's evidence base comprises:

- Green Infrastructure Strategy
- Planning Policy Guidance Note 17 (PPG17) 'Planning for Open Space, Sport and Recreation' Assessment
- Cannock Chase SAC Visitor Impact Mitigation Strategy, Footprint Ecology, March 2010

4.2. The PPG17 Assessment, at Appendix C, sets out standards for the provision of open space and recreation facilities. The strategy as produced in March 2009 and has not been tested through the development plan process as in accordance with Paragraph 8 of PPG17. The PPG17 assessment is highly detailed in terms not only of the level of provision, but also design requirements. In relation to multifunctional greenspace (MFGS)¹ no quantitative standard is set.

| Type | Quantitative Standard |
|-----------------------------|--|
| Allotments | 1.6 sq.m. per person |
| Multi-functional greenspace | No per person standard given – based on accessibility and outcomes |
| Formal play provision | 0.4 sq m per person |
| Multi-sport Courts | 0.35 sq m per person |
| Youth Facilities | 0.15 sq m per person |
| Artificial Turf Pitches | 0.53 sq m per person |
| Bowling Greens | 0.18 sq m per person |
| Grass Sports Pitches | 13.3 sq m per person |
| Tennis Courts | 0.35 sq m per person |
| Indoor Sports Halls | 0.1 sq m of building per person |
| Swimming Pools | 0.06 sq m of pool building per person |
| Total outdoor | 16.86 sq.m. per person |
| Total indoor | 0.16 sq.m. per person |
| TOTAL | 17.02 sq.m. per person |

4.3. By comparison, the NPFA Six Acre standard suggests that for each 1,000 residents there should be 2.4 hectares (6 acres) as follows:

- 1.6 hectares (4 acres) for outdoor sport and recreation space (including parks)
- 0.8 hectares (2 acres) for children's play, with about 0.25 ha of this equipped playgrounds

4.4. SBC's standard provides for around 1.69 Ha, excluding the MFGS element. Assuming that equates to around to 0.7 Ha, the level of provision for outdoor space would be broadly that under NPFA..

4.5. The Green Infrastructure Strategy identifies five strategic areas:

- A. Doxey and Tillington Marshes
- B. Marston and Sandyford Brooks and the land between Parkside and the Industrial Estate (proposed as Stafford Common Community Park)
- C. River Sow Corridor between Littleworth, Baswich and Forebridge
- D. River Penk and Canal Corridor between Queensville, Wildwood and Rickerscote (proposed as the Penk & Sow Natural Parklands)
- E. Stafford Castle/Golf Course between Doxey and Weston Downs

¹ Amenity greenspaces; Churchyards and cemeteries; Natural greenspaces; Parks and gardens

- 4.6. The Stafford Castle/Golf Course between Doxey and Weston Downs strategic area covers the whole of the Burleyfields area. Key actions are identified as:
- Retain all existing footpaths in development design layout
 - Create a buffer around Stafford Castle to prevent the character of the site from being affected by new development; this could be in the form of a Castle Park or in conjunction with the golf course.
 - Create new access routes around Doxey included a dedicated link to the Way for the Millennium route
 - Promote Stafford Castle as a gateway, improved signage and interpretation
 - Ensure the Castle area is connected to the Way for the Millennium in development design layout
 - Protect hedge-lines and woodland patches through development control to maintain a level of landscape character and connectivity for wildlife
- 4.7. Footprint Ecology have produced a *Visitor Impact Mitigation Strategy for the Cannock Chase Special Area of Conservation*. The strategy sets out recommendations for measures which it sees as necessary to enable the delivery of dwellings in the vicinity of Cannock Chase Special Area of Conservation (SAC), without causing a likely significant effect on the SAC. The strategy relates to Cannock Chase District, Lichfield District, South Staffordshire District and Stafford Borough, and a zone of influence of 12 miles from the SAC boundary. It is based on estimate new development within these Districts, as set out in their relevant development plans and estimates a 9% increase in the number of visits to Cannock Chase. The report states that in order to ensure no adverse effect on integrity, mitigation measures should aim to ensure no net increase in recreation pressure to the SAC, and ideally a reduction in pressure and enhancement to the SAC. Amongst the measures proposed are the Phased creation of c.800ha of Suitable Alternative Natural Greenspace (SANGs) serving people living within 12miles of the SAC. This estimate is based on the need to provide 16 ha of SANG per 1000 people.
- 4.8. Footprint Ecology's 12 Mile Zone of Influence is based on visitor data to the AONB not the SAC. There is a need to re-visit this study based on more up to date visitor numbers, which we understand is underway. This re-evaluation of the new data needs to be more closely focussed on the SAC designation, although enhancing the wider AONB would help to relieve pressure on the core SAC site. We also consider that the simple zonal approach to assigning the zone of influence and therefore mitigation measures is not adequate and should be matched against actual visitor patterns. The Zol for the Thames Basin Heaths, for example, was 5km and here a 12 mile (19km) Zol seems excessive when 70% of visitors to the site are within 10 miles and almost half are within 5 miles.
- 4.9. Having re-evaluated the evidence there will be a need to consider where SANGs are provided and whether there is a need to provide additional space within major developments. Clearly a provision of 16 ha per 1,000 population, if it were to be required on-site, for an area such as Burleyfields, would result in a significant land take. Conversely if provision toward this scale of provision were sought through S106 or CIL that is likely to have significant viability implications.

5 Biodiversity

- 5.1. Staffordshire Wildlife Trust undertook a desk –based assessment of development sites around Stafford in 2008. With regards Burleyfields it recommended:
- Survey BAS, including current status of water voles. Note extent of Open Mosaic habitat within and near BAS.
 - Survey SBI and consider extending along disused railway eastwards
 - Initial survey of hedges along green land to south of site.
 - Protect or mitigate for water voles
 - Protect or mitigate for badgers
 - Protect or mitigate for otters
- 5.2. Phase 1 habitat surveys have been carried out:
- by EDP, dated August 2008 for Taylor Wimpey
 - by EDP and Halcrow for St Modwen in 2008 and 2009, respectively
 - by SLR in May and July 2011 for Bellway
- 5.3. These reports are supplemented by Reptile, Badger, Great Crested Newt and Bat surveys (variously over period 2009 and 2010) for St Modwen.
- 5.4. The largest extent of the site consist of greenfield land comprising arable farmland, grassland, waterbodies, a ditch network, a small brook, hedgerows with associated mature/veteran trees, scrub, a relict orchard, woodland and reedbed. The hedgerows, veteran trees, wet woodland, reedbed and waterbodies are considered to be significant habitats at a local to district context and provide a strong local context for a high quality living environment with accessible natural greenspace.
- 5.5. The key ecological considerations, identified as a result of the above investigations, for development on the site, include:
- The potential impact on site hydrology, both in relation to water quality and quantity, with regards to Castle Meadows Biodiversity Alert Site and the Doxey Brook, a tributary of the River Sow.
 - The potential importance of specific hedgerows, with regards to the ecological criteria for ‘important’ hedgerows under the Hedgerow Regulations 1997;
 - The mature/veteran boundary trees dispersed across the site;
 - Small parcels of woodland, of which one is wet woodland;
 - A diverse network of aquatic habitats;
 - A small parcel of reedbed, located on the north west of the site;
 - Aquatic and terrestrial habitat for great crested newts;
 - Potential impacts upon the large number of badgers setts dispersed across the southern, western and northern areas of the site;
 - Potential building and tree roosting habitat, and foraging habitat, for bats;
 - Potential habitat for crayfish;
- 5.6. The Phase 1 surveys identify no significant constraints to allocation or development of the site, although indentify issues which need to be taken into account in masterplanning of the area.

6 Housing

6.1. The Council's evidence base comprises:

- Strategic Housing Market Assessment 2007, Outside, April 2008
- Economic Viability of Housing Land in Stafford Borough, Levvel, July 2011

6.2. In terms of approach, the Council seeks that of the 30% of units are provided as affordable and that of 25% are for social rent and 5% intermediate housing. That is at odds with Government policy which seeks to facilitate people into home ownership and the views expressed by stakeholders through the SHMA.

6.3. In terms of mix, the SHMA does not analyse evidence in terms of market mix, whilst in terms of affordable housing mix, the SHMA suggests a need for small properties, based on analysis of the Council's waiting and transfer list. Correspondence with the Housing Strategy & Research Officer suggests a need for family affordable housing (2, 3 & 4 bedrooms), rather than 1 bedroomed properties and a preference for houses rather than flats.

6.4. The SHMA is based on data from 2006 and 2007 and therefore its relevance to a development plan being progressed for adoption in 2012 or 2013 and looking to 2031 must be questionable and a considerable risk for the Council. Significantly, the approach pre-dates the Government's approach of affordable rent.

6.5. The *Economic Viability of Housing Land in Stafford Borough, Levvel, July 2011* explicitly states that sites larger than 150 units were not included in the study and that the financial viability of such sites are to be considered via the Stafford Borough Infrastructure Strategy. There is therefore, currently no evidence base upon which to determine a viable level of affordable housing in line with the requirements of PPS3.

6.6. It is, however, worth noting that the Levvel study considers that in relation to the north of Stafford [and Burleyfields falls within this broad value area within the report]:

Viability is more challenging on all sites in the North of Stafford town. Development within this area is however more likely to be concentrated in areas which achieve better values than the overall average and it will therefore be necessary for officers to have particular regard to the specifics of the site under consideration.

6.7. Given that elements of Stafford West are previously developed and given the upfront infrastructure costs of major developments, it is likely that any further consideration of affordable housing issues at Burleyfields will suggest that 30% is challenging.

6.8. Overall, there is a lack of evidence relating to the Council's proposed approach to housing. Evidence on viability in relation to major schemes is lacking and the evidence regarding mix and tenure is dated.

7 Energy

- 7.1. The evidence base comprises the Staffordshire County-wide Renewable / Low Carbon Energy Study by CAMCO, September 2010
- 7.2. Overall the aim of the study is to inform the local authorities about the technical potential, the viability and the deliverability of various renewable and low carbon options. The study also included a review of a number of major development sites within the study area to examine the viability and delivery implications for achieving higher carbon standards in practice.
- 7.3. The reports key recommendations are to:
- Accelerate local development carbon targets ahead of national policy, as set out in a flexible
 - framework which will support the process of dealing with concerns over viability yet maintain a
 - focus on driving up carbon standards
 - Establish a multi-authority / county carbon investment fund to channel developer contributions
 - towards carbon reduction projects with the local/county area and provide “allowable solutions”
 - that will be required to deliver zero carbon standards on new buildings (2016 from homes and
 - from 2019 for most other buildings)
 - Establish a county-wide low carbon energy generation / low carbon development steering group (with representation from all authorities involved). The principal aims of this group will be to oversee and support:
 - the implementation of joint initiatives
 - the development of shared capabilities and resources
 - consistency of planning policy across the county
 - consistency development control practices of across the county
 - Develop a shared technical support service, principally to review compliance to carbon standards in new development seeking planning permission
- 7.4. The study looks at a number of worked examples for reducing carbon emissions, including a scheme of 900 homes. For each form of development the report includes a number of scenarios for reducing carbon emissions.
- 7.5. For larger residential-led development (generally over 1,000 units) or where lower cost solutions are available, the report proposes that a target of meeting zero carbon standards ahead of 2016 is set. This is said to be “given that the FIT and RHI can now support these schemes and help to deliver Code for Sustainable Homes credits in a viable way”. Recent events in terms of Feed-in-Tariffs must question that element of the report.
- 7.6. The report identifies significant costs for achieving these standards. However, it does not assess the impact of this on the viability of development or the impact on rate development as required by para. 33 of PPS1. Rather it states that viability should be assessed.
- 7.7. Many of the options factor in the receipt of Feed-in-Tariffs. The likelihood of FiT continuing and being available at the rates assumed is highly doubtful. Consideration of all the costs of development from the proposed planning policies needs to be undertaken by the Council, taking into account affordable housing, building standards and infrastructure requirements.

8 Water Resources & Drainage Infrastructure

8.1. The Council's evidence base comprises:

- Level 1 Strategic Flood Risk Assessment alongside Lichfield District Council, Staffordshire Moorlands District Council and Tamworth Borough Council, November 2009
- Outline Water Cycle Study (Royal Haskoning July 2010) and Addendum (Royal Haskoning April 2011)
- Phase 1 Surface Water Management Plan (Royal Haskoning July 2010) and Addendum (Royal Haskoning April 2011)
- Phase 2 Surface Water Management Plan (Royal Haskoning May 2011)

Water Supply

8.2. Correspondence with Severn Trent Water Limited (STWL) through the WCS/SWMP process confirms that they are confident that, as long as water resources are available, they will be able to supply proposed developments at Stafford.

8.3. Based on discussions with STWL as part of the WCS/SWMP process, all the potential development sites and areas, including Burleyfields, are categorised as 'green' for both water supply and resources. There is limited headroom available within the Staffordshire and East Shropshire WRZ and, as such, if development levels were to be at the higher levels of development suggested by NLP through the RS process, this may result in a requirement for additional water resources and new infrastructure.

8.4. Overall, no major "show stoppers" were identified by STWL with regards to wastewater collection and treatment within Stafford Borough. There are a number of restrictions regarding WwTW capacity and infrastructure extent/capacity have been identified. In terms of Brancote WwTW the WCS identifies no expansion issues with regards to either the physical capacity of the site or the discharge consent. It suggests that there is capacity at Brancote to accommodate 14,342 dwellings. No significant issues are identified with regards to wastewater collection at Burleyfields.

8.5. Detailed discussion will be required with STWL at the appropriate time, but the evidence base does not hinder an allocation.

Flood risk

8.6. The Level 1 Strategic Flood Risk Assessment (SFRA) identifies some parts of the Burleyfields area as being within flood zone 2 and some minor parts with Zone 3a.

8.7. Further flood modelling has been undertaken by Halcrow for St Modwen. That work identifies deficiencies in the published flood risk mapping. Halcrow has built a new hydraulic model of the Doxey Drain and the River Sow which seeks to overcome those deficiencies.

8.8. Halcrow's modelling reduces the extent of Flood Zone 2 significantly in relation to the Castle Works site. That Flood Zone modelling has been accepted by the EA. Given the greater precision and accuracy with Halcrow's work the existing published flood mapping for the area must be considered to be in need of updating. We understand that the EA has performed some additional modelling in the area and have approved the results and are updating their mapping. The timescales for this becoming publicly available are unclear. Dependent upon the outcome of the EA modelling, the Halcrow model should be run to determine a revised Flood Zone map for the rest of Burleyfields.

9 Movement / Traffic

9.1. Existing evidence relates to:

- the Major Scheme Business case for the Stafford Western Access in Improvements
- the Stafford Borough Infrastructure Strategy.

9.2. In terms of the overall plan and distribution of development at Stafford, the Infrastructure Strategy refers to work by W S Atkins *Stafford Growth Options Study – Draft Further Initial Option Assessment Technical Note* (Atkins, April 2009). That report does not seem to be available separately. It is reported in the Infrastructure Strategy as concluding:

that, with the committed Western Distributor Road, Option 1 (7,000 new homes in the western and northern directions of growth) can be delivered without provision of the Eastern or Southern Distributor Roads.

9.3. It is also worth noting that the report states:

the Southern Distributor Road only has road user benefits if the western, northern and eastern expansion areas are required and the Eastern Distributor Road is provided

9.4. Staffordshire County Council is currently modelling the impact of new development on the town. The results are expected shortly. Clearly this will be critical to supporting the soundness of the plan.

10 Community facilities

- 10.1. Taylor Wimpey's Development Framework Document identifies a number of key nearby community assets in the vicinity of Burleyfields. ATLAS has also mapped facilities across the town. Burleyfields is close to a range of important community facilities including medical services, secondary schooling and primary schooling, supporting its development as a sustainable location. Notwithstanding that, a range of local community facilities will be required within the Burleyfields area in order to meet the needs of the new community of around 2,200 homes.
- 10.2. The Infrastructure Strategy identifies that in terms of Primary Healthcare there is a strong possibility that the existing surgery at Castlefields will require expansion or replacement with more appropriate facility. Discussions with the surgery and PCT are required. A written request was sent to the PCT in September 2011. A response is awaited.
- 10.3. A more detailed audit of existing local facilities is needed in order to begin to scope the components on Burleyfields. Alongside consideration of existing facilities, examples of other recent major developers could usefully inform the mix of facilities. The types and location of community uses should also be influenced by stakeholder engagement. Work should also consider how the use of facilities can be maximised to ensure their viability, for example, through dual use of school facilities.

Education

- 10.4. Burleyfields falls within the catchment areas of Doxey Primary School and King Edward VI High School. The County advise that neither is expected to have sufficient capacity for the number of children that would be generated by development.
- 10.5. Based on presently available information, County Education considers that a new 525 place primary school, including nursery provision would be required as part of Burleyfields. County Education suggests that a site for a 525 place primary school (including nursery provision) is likely to be approximately 2.5 hectares, although this can be affected by various issues such as access, site topography, the shape of the site, nursery provision and car parking.
- 10.6. In addition to on-site provision education contributions towards secondary and sixth form provision will be sought by the County. The County estimates that a development of 2,200 dwellings could add 330 secondary school aged pupils and 66 sixth form pupils. Clarification is needed regarding the capacity of existing schools and the basis of these calculations.

11 Employment

- 11.1. The draft Plan for Stafford identifies an area fronting Newport Road for employment uses, with B1 office development identified by the Council as its preferred use.
- 11.2. The Council's evidence base comprises the Employment Land Review 2010. That in turn is supported by a technical appendix from the County on estimating land requirements.
- 11.3. The employment land review sets out the overall economic picture and potential levels of land requirements. Based on forecasts by Cambridge Econometrics the paper sets out employment forecasts which show 9,800 fewer jobs in 2026 compared to 2006. The biggest job losses are expected in manufacturing and Government and other services, whilst Financial and business services are forecast to grow.
- 11.4. The report looks at land requirements from a number of perspectives. The continuation of past development trends approach yields by some margin the greatest potential levels of employment land requirements between 2006–2026. Using average development levels taken from the last 10 years it surmises that, around 166 hectares of employment land would be required, while taking into account development levels from the past 5 years, around 172 hectares of employment land would be required.
- 11.5. The report acknowledges that these land requirements are likely to be skewed towards the upper end of the "expected" levels of land requirement in Stafford Borough over the next 20 year period, and would be the result of rapid growth levels in the area's economy.
- 11.6. Using labour demand approach the report considers a number of different scenarios and assumptions. These scenarios result in a need for between 24.5 hectares and 34 hectares.
- 11.7. The report rightly identifies that labour demand predictions are based on trends and do not take account of policy approaches. Nevertheless, there is clearly a significant disparity between forecasts and aspiration and the risk that areas of land remain vacant if there is insufficient demand for B Class uses.
- 11.8. Careful consideration needs to be given to the "employment" offer at Stafford West. Clearly there is a need to locate homes and jobs in close proximity, and indeed Stafford West fulfils that objective through its location close to the town centre and not only its existing jobs, but those that will be created through the development of 36,000 square metres of new retail space and 45,000 square metres of new office proposed in the plan. This floorspace has the potential, at typical employment densities, to accommodate around 4,000 new jobs. Further work is required on the appropriate role of Burleyfields in meeting employment needs and the types of jobs to be planned for.

12 Utilities

- 12.1. The Stafford Borough Infrastructure Strategy provides the supporting evidence to the Council on utility provision.
- 12.2. The WCS/SWMP (as set out earlier) considered that there were no major issues with regards water infrastructure. The borough-wide infrastructure strategy (which pre-dates the WCS/SWMP) identifies some specific requirements for water infrastructure.

Gas

- 12.3. The Infrastructure Strategy identifies no major gas infrastructure works required in Stafford and that the gas supply network appears to be robust and has the potential capacity to accommodate all of the proposed developments. As a result, the majority of the proposed sites only require standard' connections into the medium pressure system.

Electricity

- 12.4. The Infrastructure Strategy identifies that for any significant development it is likely that a new local substation will be required to service the specific locations. Given the location of Burleyfields on the outskirts of the existing urban development and its proposed scale, it is likely that it would require a new local substation. The cost of this is estimated at around £70,000 – to be borne by development.
- 12.5. Improvements to the 11kv network are also likely to be required.

Water

- 12.6. Although the WCS/SWMP identifies no significant issues, the infrastructure strategy (which pre-dates the WCS/SWMP) identifies some specific measures and that development to the west of Stafford may need to be serviced by a new large pumping station and rising main.
- 12.7. Within Stafford all of the sewage is treated at Brancote sewage treatment works located 3.5km to the east of Stafford town centre. Flows are pumped to the treatment works from either the Baswich or Lammascote pumping stations. Severn Trent have undertaken notional assessments for each of the proposed developments and provided costs for notional outline solutions which would deliver the sewage to the pumping stations for subsequent transfer to the treatment works generally using the existing infrastructure. These estimate a cost of £573,000 for foul water network upgrade and £473,000 for additional surface storage capacity. These are subject to further detailed studies as development becomes clearer. It should be noted that there are capacity issues at Lammascote. However, through the WCS STWL has indicated confidence that solutions exist.
- 12.8. In terms of water supply, the Infrastructure Strategy and WCS are somewhat at odds, with the latter [more recent study] identifying no particular issues, but the former suggesting that reinforcement works are required to release capacity at the Peasley Bank Storage Reservoir. These reinforcements are put at £1.75m. The Infrastructure strategy suggests that this would be delivered by a commuted sum levied against development. Our understanding is that Water Companies are not able to accept S106 contributions, rather any improvements required are funded via the Asset Management Plan process and recouped via charges to households.
- 12.9. Further clarification is required regarding some discrepancies between the documents and the means of funding works.

13 Noise

13.1. Burleyfields lies between 2 potential sources of noise – the M6 and the West Coast Main line. Two sources of evidence are available regarding these noise sources:

- 'Noise & Vibration' Scoping Report Peter Brett Associates April 2008, for Taylor Wimpey
- Castle Works, Stafford, Report on Existing Noise Climate, Hoare Lea, May 2011 for St. Modwen

Implications of M6

13.2. PBA undertook site visits and measurements of noise at six different locations across Burleyfields.

13.3. This work identified the main source of noise experienced being road traffic flows on the M6. Some site plant noise from the factory works located at Castlefields was detected, but this noise source is unlikely to be an issue given the buildings are to be demolished as part of redevelopment.

13.4. Short-sample measurements were undertaken by PBA to provide an initial indication of the noise environment. Based on these measurements it is estimated that up to 190m from the M6 could fall within Noise Exposure Category (NEC) D where residential development should be avoided. The majority of the land falls within NEC B or NEC C where appropriate mitigation would be required. If any dwellings were proposed on land falling within NEC C they would require noise mitigation measures to ensure design criteria are met.

Implications of West Coast Mainline

13.5. A detailed assessment of noise emanating from the West Coast Mainline has been undertaken by St Modwen to support an application for residential development at the Castle Works site.

13.6. The report identifies low level of ambient noise levels which are punctuated by short duration higher noise levels as trains pass-by. The adjacent rail lines carry intercity and local rail traffic regularly during the day. There is also significant night time traffic. Owing to the proximity of the nearby rail junction and station, speeds are low past the site – typically 50kmph. The typical noise event lasts 10 – 15 seconds for intercity trains, 5 – 10 seconds for local trains. Slow moving freight trains have longer pass-by times. The report recommends a number of measures to ensure a suitable living environment. The Environmental Health Officer has accepted that the Council's standards for noise can be achieved at Castle Works.

13.7. Further land within the allocation adjoins the WCML. At this stage detailed noise assessment has not been undertaken and will be required to support any planning application(s) on this land. However, the principles established in relation to St Modwen's planning application (11/15998/OUT) would suggest that adequate mitigation can be provided and that there should be no obstacle to the allocation.

14 Agricultural Land Quality

- 14.1. Agricultural Land Classification (ALC) survey information indicates that the area contains approximately 18 Ha of grade 2 land and 34 Ha of grade 3a with the remainder comprising grades 3b and 4, or non-agricultural land. Provisional ALC mapping indicates that much of the hinterland of Stafford is of a similar quality, the majority being grade 3 with pockets of grades 2 and 4.
- 14.2. The ALC grades within Burleyfields appear to be broadly representative of the grades of land surrounding Stafford, which is largely Best & Most Versatile (BMV) land. The BMV land within the site is therefore not unique within the local context, but broadly representative of the supply of such land in the hinterland of Stafford. The delivery of housing at Burleyfields is unlikely to have a greater impact on BMV land than the delivery of a similar level of housing at alternative locations.

15 Rights of Way

- 15.1. EDP conducted a Rights of Way Assessment for Taylor Wimpey in 2008. That assessment identifies five existing footpaths and one bridleway within the area. The rights of way run broadly north-south and east-west across the site, connecting Castletown to Derrington via three motorway underpasses, and connecting Stafford Castle and its associated open space in the south, with Doxey in the north.
- 15.2. The former Stafford to Newport railway line forms part of 'The Way for the Millennium', a permissive route under Section 31 of the Highways Act. This permits use on foot and bicycle. Overall, the route is evenly distributed, well connected, and well used throughout the site by cyclists, horse riders and pedestrians.
- 15.3. These Rights of Way will need to be taken into account in masterplanning. They also provide a strong basis for connectivity, particularly to the wider countryside for recreation purposes.

16 Heritage

16.1. The evidence in relation to the historic environment comprises:

- Archaeological Desk-based assessment, EDP, May 2008
- Historic Environment Character Assessment Stafford Environs, Stafford BC, June 2009
- Baseline Landscape and Visual Amenity Assessment, EDP, April 2008
- Local Plan Housing and Industrial Allocation: An Archaeological Assessment Archaeology Section Report 1, SBC 1991 (reported in EDP's Archaeological Assessment 2008)

Historic Environment Character Assessment: Stafford Environs

16.2. The aim of this work was to provide an overview of the historic environment of Stafford Borough through the definition of Historic Environment Character Areas (HECAs) at a broad level and then to undertake a more detailed assessment of the historic environment character around Stafford. The assessment includes a scoring system to evaluate the impact of medium to large scale housing development upon each of the zones.

16.3. The initial assessment places Burleyfields within HECA 14d. This identifies the area as having high potential for prehistoric and later archaeological remains. Further detailed work assesses the site as falling within SHECZ6 North of Stafford Castle.

16.4. Those SHECZ's are scored on various categories and a total score was calculated for the value of each HECZ. It concludes that the zones where there is likely to be significant impacts upon the historic environment lie mostly to the east and west of Stafford. The report refers to an Appendix 3 as providing summaries of the historic environment considerations recommended for each zone. It also gives scores for each of the SHECZs. SHECZ6, within which Burleyfields falls, is attributed an overall value 17.

16.5. Appendix 3 which is not available as part of the report. The report also refers to detailed scoring, but similarly, the detailed scores against each aspects of the methodology has been requested, but does not appear to be available.

Archaeological desktop assessment

16.6. An archaeological desktop assessment for Taylor Wimpey identifies that Burleyfields does not contain any known nationally important archaeological remains, Registered Battlefields, Parks or Gardens of Special Historic Interest, listed buildings or conservation areas.

16.7. Stafford Castle Scheduled Ancient Monument lies around 300m south of Burleyfields. There are a small number of listed buildings close to the site and a number of entries in the Historic Environment Records within the area. HER01306 records the possible site of a lodge, formerly associated with Stafford Castle. Other records within the area are, for the most part, associated with the development and maintenance of the medieval and later agricultural landscape. Whilst the settlement of Doxey, located to the north of the site, is recorded as having Anglo-Saxon origins, this is based purely on evidence from documentary sources, and not from known monuments, findspots or past fieldwork.

16.8. The only evidence for activity, predating the medieval period, within or close to the site boundary, relates to a scatter of Roman pottery, which was identified close to the M6 (HER 04156). This has been thought to be the location of potential Roman villa. However, this area, was subject to detailed geophysical survey in 2008 which found no evidence for any archaeological remains of significance.

16.9. The archaeological assessment demonstrates that there is no in principle reason to prevent development of the site.

Setting of Stafford Castle

16.10. To the south of Burleyfields lies the Stafford Castle Scheduled Ancient Monument. EDP's landscape and visual assessment considers the implications for the Castle's setting. It

identifies that the extension to the golf course and its associated landscaping will suburbanise the area between the Castle Mound and Burleyfields. It also identifies that the development would be seen in the context of existing urban development. It recommends structural planting along the southern boundary to soften potential views.

- 16.11. EDP's archaeological Assessment also refers to a 1991 assessment by the Archaeology Section of Stafford Borough Council (SBC) into five landholdings that were being considered for allocation for residential and industrial development within the Stafford Borough Local Plan 2001 (*Local Plan Housing and Industrial Allocation: An Archaeological Assessment* Archaeology Section Report 1, SBC 1991).
- 16.12. EDP identify that the study assessed the effect of potential proposed development upon the archaeological and historic environment. This was achieved through a desk-based study, followed by a rapid field survey. The sources consulted included the HER (then the SMR), Ordnance Survey maps, aerial photographs and historic documents. Based on the results of the desk study and the field survey, three zones were identified for each of the sites under consideration:
1. Zones of maximum archaeological constraint;
 2. Zones of archaeological potential; and
 3. Zones of no anticipated archaeological constraint.

The area west of Stafford was described within that report as Area 1. The zone of maximum archaeological constraint was defined in order to protect not only the physical remains of Stafford Castle, but also its setting and surrounding contemporary landscape. The plan (shown on EDP413/09a of EDP's Archaeological Assessment) shows that the southern boundary of the Burleyfields area forms, for the most part, the northern boundary of the Zone of Maximum Archaeological constrain. EDP's report advises that this confirms that the land at Burleyfields does not make a significant contribution to the setting of the SAM or its historic context.

17 Ground conditions

- 17.1. Parts of the site are previously developed having been, or are still, in industrial use. Halcrow has undertaken a desk-based assessment in relation to the Castle Works site. That indicates that made ground may be a source of contamination owing to previous industrial processes. However, the chemical data does not suggest that major remedial work is necessary and it is likely that conventional measures, such as capping, will be sufficient.
- 17.2. The majority of Burleyfields is underlain by a non-aquifer Mercia mudstone although areas of alluvium or glaciofluvial deposits are present to the northern parts of the site. Further detailed work on grounds conditions will be needed to inform the drainage strategy as soakaways are unlikely to be feasible. The northern part of the site has the potential for weak natural soils which will need to be considered in the design of building foundations.
- 17.3. Historic landfills are located to the north and east of the site and remnant 'marl pits' require investigation to ensure that the backfill material does not pose a risk of contaminants.

18 Conclusions

- 18.1. There is an extensive evidence based in relation to Burleyfields collated by both landowners/promoters and the Council. That evidence suggests there are no insurmountable constraints to development at Burleyfields. A number of issues arise from the evidence base which will need to be taken into account in masterplanning, including a need for some further work to inform components of the new community.