THE PLAN FOR STAFFORD BOROUGH

EXAMINATION STATEMENT - ISSUE 4: STAFFORD TOWN

I write in response to the publication of Schedule of the Inspector's Matters and Issues on 09 September 2013, and can provide clarity on the following issues relating to Policies Stafford 1-4.

4.1 POLICY STAFFORD 1 – STAFFORD TOWN
C(iv) Proposals for mixed-use development at Kingsmead and Riverside.

Both of these sites lie within the floodplain, however a sustainable design solution has been reached regarding applications 13/18318/FUL & 11/16363/FUL (Riverside) and 11/16362/FUL (Kingsmead) and as such we are satisfied that these sites can be safely regenerated if the design adequately take flood risk into account. In light of this the Environment Agency have no objection to the allocation of these sites as mixed-use town centre redevelopments.

4.2 POLICY STAFFORD 2 – NORTH OF STAFFORD
A(iii) Is the Strategic Development Location at North of Stafford appropriate, effective, sustainable, viable, deliverable, fully justified and soundly based, including:

The scale, nature, delivery, funding, viability and timing of proposed infrastructure requirements, including highway capacity and public transport improvements (including Northern Access Improvement Scheme), drainage and flood management works, utility and telecommunication services, education and health facilities, and mitigation of the impact of development on Cannock Chase SAC (including SANGS);

This strategic development location is located on the Greenfield headwaters of the Marston Brook and Sandyford Brook catchments, which pose a significant risk of flooding to downstream communities within the town centre. Over 150 residential properties within the Sandyford Brook corridor are indicated to be affected by flooding. In an attempt to alleviate the risk and consequences of flooding to downstream communities and Stafford Town Centre, it is envisaged that this strategic development will incorporate enhanced surface water attenuation and upstream flood storage measures. The Environment Agency is currently developing the evidence base to support a potential flood management scheme at this site that would be constructed in partnership with the developer to provide these strategic flood risk improvements.. Such flood risk reduction measures will include the restriction of surface water runoff from the site to less than the pre-development (i.e. Greenfield) condition through on site surface water attenuation and, potentially, upstream storage of floodwater within the site.

Local Levy funding has been allocated to allow the Environment Agency to investigate in more detail what flood alleviation options are the most effective, and to facilitate discussions with developers about the scale and type of the different flood risk management solutions required. Severn Trent Water has also identified flooding problems in the area. The first stage of this investigation involves the development of a detailed computerised model of the Marston Brook and Sandyford Brook and the urban surface water drainage network to establish existing flood risk to communities within the catchment, which is due for completion by Spring 2014. This will also include outline testing of the effectiveness of potential flood mitigation options, with a view to identifying

the most effective and cost-beneficial solutions.

This issue is was originally raised within the Level 2 Surface Water Management Plan and the required works are included within the Infrastructure Delivery Plan, although it does state that all works will be funded by the developer. This should be modified to accurately reflect the partnership working between the Environment Agency and the developer to bring about these improvements.

A(v) Impact of the proposed development on the environment, including the landscape, ecology, historic environment and surrounding countryside, and existing services

Point (vii) ensures that the existing watercourses and their associated habitat on site are protected and enhanced as part of the green infrastructure scheme. The water environment will also play a key role in multifunctional green space creation through the construction of an open water balancing facility, providing wider SuDS benefits to the development (xvi). Point (xvii) refers to the need for the foul drainage infrastructure to be improved in order to meet the needs of the additional housing feeding into the foul main system. We note Minor Modification M37 and M116 which provide an updated position from Severn Trent Water with regards to these works. It is essential that development is timed in accordance with the improvement of the receiving foul drainage infrastructure to ensure that no pollution to the water environment occurs either as a result of undersized transmission infrastructure or inadequate treatment due to an overloading of the works. This is in compliance with the last section of the Sustainable Drainage section on Policy N2 which requires adequate foul drainage arrangements to be put in place to protect the water environment.

4.3 POLICY STAFFORD 3 – WEST OF STAFFORD

a. Is the Strategic Development Location at West of Stafford appropriate, effective, sustainable, viable, deliverable, fully justified and soundly based, including:

iii. The scale, nature, delivery, funding, viability and timing of proposed infrastructure requirements, including highway capacity and public transport improvements, (including Western Access Improvement Scheme) drainage works, utility and telecommunication services, education facilities, mitigation of the impact of development on Cannock Chase SAC (including SANGS), open space and green infrastructure;

This site lies mostly within low risk Flood Zone 1, however areas to the north of the site nearest Doxey Road are affected by floodplain. We understand the developer is currently undertaking modelling to refine this floodplain. Detailed design will need to ensure the layout take takes the sequential approach to land use within areas affected by flooding and that the proposed access to the north of the site will be safe during a flood event. Mitigation measures will need to be put in place to ensure the development is safe and will not increase the risk of flooding the third parties.

This SDL is located within an area defined by the Level 2 SWMP as being a key drainage area where runoff rates should be reduced below greenfield rates post development through the use of SuDS to provide wider flood risk benefits elsewhere in the town. Point (vii) addresses this and this is clarified under Minor Modification M40.

iv. Impact of the proposed development on the environment, including the landscape and surrounding countryside, historic environment and heritage assets, including the setting of Stafford Castle and St Mary's Church, nature conservation, flooding, and existing services;

A culverted watercourse crosses this site and in order to provide habitat and water quality benefits essential to meeting the requirements of the Humber River Basin Management Plan this should be renaturalised and integrated into the proposed green infrastructure network where possible. This should be ensured through the Minor Modifications to point (xii) of this policy and Policy N4 Part J9(iv).

Point (xviii) refers to the need for the foul drainage infrastructure to be improved in order to meet the needs of the additional housing feeding into the foul main system. We note the Minor Modifications from Severn Trent Water which provide an updated position with regards to the required works. It is essential that development is timed in accordance with the improvement of the receiving foul drainage infrastructure to ensure that no pollution to the water environment occurs either as a result of undersized transmission infrastructure or inadequate treatment due to an overloading of the works. This is in compliance with the last section of the Sustainable Drainage section on Policy N2 which requires adequate foul drainage arrangements to be put in place to protect the water environment.

4.4 POLICY STAFFORD 4 – EAST OF STAFFORD

a. Is the Strategic Development Location at East of Stafford appropriate, effective, sustainable, viable, deliverable, fully justified and soundly based, including:
iv. The scale, nature, delivery, funding, viability and timing of proposed infrastructure requirements, including highway capacity and public transport improvements (including Eastern Access Improvement Scheme, Eastern Distributor Road and other road improvements), drainage works, utility services, education and health facilities, mitigation of the impact of development on Cannock Chase SAC (including SANGS), and green infrastructure;
v. Impact of the proposed development on the environment, including the landscape and surrounding countryside, historic environment and heritage assets, nature conservation and existing services;

This site lies within low risk Flood Zone 1 and is therefore the sequentially desirable location for development in relation to flood risk. It is located however within an area defined by the Level 2 SWMP as being a key drainage area where runoff rates should be reduced below greenfield rates through the use of SuDS to provide wider flood risk benefits elsewhere in the town. Point (viii) addresses this and this is clarified under Minor Modification M43.

Point (xxi) refers to the need for the foul drainage infrastructure to be improved in order to meet the needs of the additional housing feeding into the foul main system. We note the Minor Modifications from Severn Trent Water which provide an updated position with regards to the required works. It is essential that development is timed in accordance with the improvement of the receiving foul drainage infrastructure to ensure that no pollution to the water environment occurs either as a result of undersized transmission infrastructure or inadequate treatment due to an overloading of the works. This is in compliance with the last section of the Sustainable Drainage section on Policy N2 which requires adequate foul drainage arrangements to be put in place to protect the water environment.

Yours sincerely

Mr Paul Gethins

Sustainable Places Team Leader