

Matter	Code	Summary of Response	Representatives	Council Response
Matter 4- Stafford Town				
Matter 4- Stafford Town	M4-2a-	<p>Beacon Farm North East Stafford (BF_NES) is a more sustainable site than the Northern SDL set out in the Plan (A1). A comparative Sustainability Assessment with the Northern SDL highlights matters where BF_NES performs better in sustainability terms.</p> <p>The assumptions regarding BF_NES within the Sustainability Appraisal Addendum are unsound. The general transport engineering solutions for traffic mitigation north of Stafford at Beaconside (A513) for the BF_NES would be similar to those for the northern Strategic Development Location (SDL). The traffic mitigation from new development at BF_NES provides a better strategic fit to link highway improvements to the southern end of Beaconside (A513) through the Weston Road roundabout and the proposed Stafford Eastern Access Improvement scheme.</p> <p>The existing arrangement for the signalised junction at Dyson Way and Beaconside (A513) offers no impediment to an adequately engineered junction solution to provide access to BF_NES.</p> <p>An analysis of site accessibility highlights that the main access to the site could be from the Beaconside (A513) with a potential secondary access from the A518 Weston Road. The site is closer to Stafford town centre than the Northern SDL and has greater potential to provide easier</p>	Lufton and Associates on behalf of Clarkes Farm	<p>The Beacon Farm North East Stafford (BF_NES) / Clarkes Farm development proposal was received at the Publication stage (February 2013), late in the plan-making process. Nevertheless the Council has sought to give the proposal due consideration through the SA Addendum process in May 2013. However inevitably the proposal has not had the opportunity of thorough public engagement and consultation compared to the other proposals within the Plan (A1).</p> <p>The North Eastern Direction of Growth (Clarkes Farm) is geographically closer to the town centre which would logically benefit access by walking and cycling modes. However the surrounding employment areas does not appear permeable.</p> <p>With respect to access by bus, both Directions of Growth – Northern and North Eastern, would require a new 30 minute bus service to make them acceptable in transport terms.</p>

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		<p>access to existing transport, walking and cycling routes.</p> <p>Analysis of the visual impact of BF_NES demonstrates that the natural topography of the site is low lying, resulting in minimal intrusion on the wider landscape, which could be mitigated through green infrastructure provision and supports ecology.</p>		<p>The reason that the Council did not include this area in the plan-making process from the Issues & Options stage was due to the detached location of Clarkes Farm from the Stafford residential area and its position behind the Ministry of Defence land.</p> <p>Atkins assessment of the Stafford town growth options, which informed the Plan process, concluded that the most efficient way of providing 7,000 new dwellings and jobs growth in Stafford was to focus the majority of the development in the North and West. For 10,000 new homes North, West and South was preferable.</p> <p>No technical transportation evidence has been submitted to support a North Eastern Direction of Growth, and define the interventions necessary to mitigate its impact.</p> <p>Traffic from the proposed North Eastern Direction of Growth would access the town via the A518 Weston Road, which operates close to capacity with significant delays inbound. Traffic accessing the town from the Northern Direction of Growth will use the A34 which has smaller delays and will benefit from bus priority going forward.</p>

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				<p>The County Council would like to see A513 Beaconside retain its function as a strategic route around Stafford Town. However it already struggles to accommodate traffic flows at peak times. To this end the number of new junctions on Beaconside should be minimised, and opportunities to relieve the route of local traffic promoted. The County Council's preferred access solution for 3,100 new homes in the Northern Direction of Growth, Stafford achieves this via a new local distributor road between A34 and Sandon Road.</p> <p>Accessibility to Clarkes Farm is not secured due to third party land and Ministry of Defence (MoD) permissions. Two vehicular accesses would be needed to serve a development of 1,000 houses.</p> <p>The proposed primary access with A513 Beaconside is only 100m from the existing signalised junction with Dyson Way. This is not ideal and it would also need to be signalised and co-ordinated with the existing junction. Technical feasibility has not been demonstrated. Therefore this calls into questions the deliverability of the proposal with a number of key issues to be addressed.</p>

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				<p>The Council does not doubt that the proposal would be effective in supporting the scale of development required at Stafford of 72% but considers that the Strategic Development Locations identified are more appropriate, have a more detailed evidence base to demonstrate delivery through the Infrastructure Delivery Plan, and are more accessible to the Stafford urban area through the existing road network.</p> <p>There is a distinct lack of robust evidence to support delivery of the BF_NES, not least in terms of the Cannock Chase Special Area of Conservation. Furthermore the integration with existing services and facilities would be more challenging at this location.</p> <p>The landscape impact of the proposal is not to be under-estimated on the village of Hopton and from longer-distance views across the northern part of Stafford town and surrounding countryside.</p> <p>As demonstrated by developments coming forward to the north and east of Stafford it is clear that the market is delivering new housing and employment at these locations. However the Stafford market is</p>

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				<p>not infinite in its capacity to deliver new housing.</p> <p>The proposal would be within 250 metres of the proposed HS2 railway line. Whilst there are no flooding issues actually on the site, to be confirmed by the Environment Agency, access to the area would be constrained to the south west along Beaconside due to the floodplain.</p> <p>The Visual Assessment undertaken is inadequate given the quantum of development proposed for the site. The analysis does not include a baseline study including a topographical analysis, and the visual appraisal is only undertaken from a limited number of vantage points and distances from the site. The majority of this new evidence was only submitted in October 2013.</p> <p>There has been no assessment of the capacity of the site to accept large scale development nor has the cumulative impact of such large scale development been considered by the assessment, including strategic infrastructure provision.</p>

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Matter 4- Stafford Town	M4-3a	Lack of consultation on the latest transport evidence. Object to development north of Stafford due to traffic impacts and landscape. Prevented from proper engagement in the process. Hopes of a lorry park were false and unfair. Need more detailed Action Plans before progressing with the new Local Plan. Lack of transport infrastructure delivery.	Creswell Parish Council	Council fully engaged with key stakeholders, including Creswell Parish, through extensive public consultation during the plan-making process. Illustrative Concept Plans were provided by developers in January 2013 for public consultation. Transport evidence was made publicly available.
Matter 4- Stafford Town	M4-4a	CT Planning highlights that through the Schedule of Additional Modifications (A26) the Eastern Distributor Road from just north of the junction with Baswich Lane and Cornwall Drive through to Milford Road, Walton on the Hill is to be deleted. Therefore, the site would no longer be affected by the protected line and will be deliverable for new housing development. The representation also suggests that the site should be included on the Stafford Town Key Map (as amended) and should be identified as a development site through the Sites Development Plan Document.	CT Planning on behalf of St Modwen	Council proposed an amendment in A26 for the Eastern Distributor Road, based on the latest evidence provided by Staffordshire County Council (D24). Site could be considered through the Sites DPD for inclusion within the new Stafford Settlement Boundary.
Matter 4- Stafford Town	M4-5a	Support the Plan's approach, viability work, delivery of infrastructure and soundness. Object to Clarke's Farm with reasons of access, devolved from Stafford urban area, no Sustainability Appraisal, no evidence and no consultation. Increased housing numbers for the Borough and Stafford town required, due to historic shortfall. Ministry of Defence clarification of numbers required with new text applying 350 new houses. Larger development areas to be identified north of Stafford as evidence shows delivery constraints for locations shown,	Jones Lang LaSalle for Akzo Nobel UK Ltd	Support and concerns about Clarkes Farm noted. No change suggested to housing numbers as fully meeting objectively assessed need. Ministry of Defence modification through A27. The Council does not accept a larger area is needed, reference to the Council's Matters Paper 5 regarding sufficient capacity. Delivery rates at Strategic Development Locations over the Plan period to be monitored in the

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		<p>due to topography, new infrastructure etc... No reference should be made to a master plan for whole area, as this restricts rapid delivery of new housing through a planning application.</p>		<p>context of completions and commitments. No detailed scheme layout to demonstrate that the area identified in the Plan is insufficient.</p>
Matter 4- Stafford Town	M4-6a	<p>Northern SDL – Flood management scheme to avoid downstream flooding. Evidence base and joint working being progressed. Deliver multi-functional greenspace including water. Severn Trent Water co-ordination of works to avoid water pollution.</p> <p>Western SDL – Low risk but ensure safe access route from Doxey and need good infrastructure. Re-naturalisation and green infrastructure is necessary. Severn Trent Water co-ordination of works to avoid water pollution</p> <p>Eastern SDL – Low risk but ensure run-off rates are resolved. Severn Trent Water co-ordination of works to avoid water pollution.</p>	Environment Agency	<p>Council notes the useful context provided for the Stafford Strategic Development Locations.</p>
Matter 4- Stafford Town	M4-7a	<p>Promoting interests at Castleworks, Stafford. Concern regarding viability and cost of plan-making with proposals to be deliverable. Cumulative effects on development to be analysed. Community Infrastructure Levy (CIL) is not worked up so concern regarding impact on developer costs and uncertainty. Infrastructure needs to be planned and achieved. Viability is crucial to plan delivery due to a quarter of new housing at Stafford west. Concern regarding zero-carbon implications. Low value area so challenging to deliver key infrastructure and affordable housing. High costs of infrastructure must be sorted out now, rather than later. Significant delivery challenges are unresolved including Stafford Western Access</p>	Planning Prospects for St Modwen Developments	<p>The Council is confident in the viability and evidence base work to deliver infrastructure and affordable housing, demonstrated by Whole Plan Viability Report and Strategic Development Location (SDL) delivery. CIL is to be a separate requirement from SDLs, with new infrastructure delivered through Section 106 agreements. Do not accept the SDLs are unviable and undeliverable. SWAI has a number of alternative protected routes, with Staffordshire County Council to consider delivery and compulsory purchase</p>

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		Improvement scheme, no agreement on access and no compulsory purchase approach proposed. A good return to developers is critical for site delivery. Castleworks approved for housing development and Suitable Alternative Natural Greenspace (SANGS) contributing to the wider area. Employment land criteria in Stafford Town policy is too restrictive, should not be cumulative in terms of meeting criteria and is not needed due to Policy E3 on Recognised Industrial Estates. Allow former employment land for housing to maximise brownfield land delivery.		if needed. SANGs provision is for Castleworks only, in order to meet Habitat Regulations Assessment (HRA) Directive requirements. Do not accept loss of employment land and weakening of criteria as the Plan should support sustainable future local communities. Policy E3 is for rural Recognised Industrial Estates rather than employment business parks at Stafford and Stone.
Matter 4- Stafford Town	M4-8a	A section of the Eastern Distributor Road to be deleted from St Thomas' road bridge to Milford Road, Walton due to lack of delivery and viability.	TF Planning	Council proposes an amendment (A26) of the Eastern Distributor Road, based on the latest evidence provided by Staffordshire County Council (D24), deleted from Baswich Lane / Cornwall Drive to Milford Road, Walton.
Matter 4- Stafford Town	M4-9a	Development West of Stafford SDL is deliverable and viable, demonstrated by the evidence base. Support the local economy and growth approach. Clarke's Farm proposal is not appropriate as an alternative, due to location, distance and quality of access to Stafford town centre, and a lack of supporting evidence and infrastructure. Housing trajectory and early delivery is supported. Delete Stafford West Concept Plan on page 55. Delete site boundaries on page 54 and amend Policies Map to remove reference to different uses: housing and mixed use.	Savills for Taylor Wimpey (UK) Ltd and Bellway Homes Ltd	General approach to delivery and viability is welcomed. Noted comments on Clarke's Farm. The Concept Plan provides a useful context to new development and certainty for local communities about what is generally proposed for land west of Stafford so the

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		<p>Amend criteria 'iv' regarding employment uses to be part of a Neighbourhood Centre rather than specific to a site, and add reference to new jobs delivered at Stafford town centre.</p> <p>Amend Appendix D regarding critical infrastructure for transport reference and remove reference to 400 homes limit.</p> <p>Delete reference to A518 Newport Road capacity.</p> <p>Amend vii concerning drainage and flood management.</p>		<p>Council does not accept the deletion.</p> <p>No change to site boundaries nor the map of housing & mixed use as this provides clarification about the location of new development in relation to the town centre</p> <p>No change to criteria iv, vii and Appendix D.</p>
Matter 4- Stafford Town	M4-10a	<p>Policy Stafford 1 – Support growth at Stafford and SDL delivery. Sustainability Appraisal and evidence demonstrates soundness. Minimum figures at Stafford with revision to the SDL to increase capacity if need extra housing. Clarkes Farm is not an alternative due to location, significant infrastructure requirements and failure to integrate with existing urban area. No Ministry of Defence requirements on northern SDL. Limited impact on urban regeneration and housing markets in nearby conurbations. More housing may be needed due to increase household formation, improved economic factors and demographics. Para 6.54 of the Plan to be updated. Support 2021 phased development at Stone together with the policy moratorium.</p> <p>Policy Stafford 2 – Fully committed to housing delivery north of Stafford. Limited landscape implications. Significant new strategic infrastructure can be delivered. High Speed 2 proposed route not an impediment to housing delivery. No Ministry of Defence requirement needed. New distributor road and secondary school is now being required by new evidence but it not</p>	Pegasus Group for Maximus Strategic Land	<p>Policy Stafford 1 - Support noted. Council does not consider a minimum figure is appropriate due to uncertainty created for the local community. Policy mechanism for a moratorium is required to deliver new development at Stafford. Strategic Development Location (SDL) to provide for new housing but also other sites may be used at Stafford. No evidence to demonstrate through detailed site layout that there is insufficient land to meet new requirements. Position on MoD, Stone after 2021 and Clarkes Farm is noted.</p> <p>Policy Stafford 2 – Noted delivery and strategic infrastructure commitments at the northern SDL. Welcome the developers' commitments to strategic infrastructure. Council concerned about housing provision being extending over Sandon Road due to being divorced from services and facilities.</p>

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		undeliverable. However site extension to enable all infrastructure to be provided will be necessary. Concern about Council's net to gross housing delivery assumptions not providing enough land. Environment Agency scheme to be delivered on-site for flooding issues and address Ministry of Defence covenant.		
Matter 4- Stafford Town	M4-11a	Concern regarding traffic implications of development east of Stafford, to be delivered after road access have been implemented. There is pressure on St Thomas' bridges and traffic congestion due to current network.	Ingestre Tixall Parish Council	Staffordshire County Council has completed detailed evidence based reports concerning the existing and future transport network for east of Stafford. The current planning consent delivers a number of solutions.
Matter 4- Stafford Town	M4-12a	Additional land east of Stafford to be allocated in the Plan to fully deliver new infrastructure required and housing provision due to lack of delivery from other SDLs at Stafford. The housing figure for Stafford Borough is too low and should be increased above 500 per year.	Commercial Estates Group	The Council considers that the housing target is appropriate for Stafford Borough, with housing delivery shown through the trajectory. Any future development east of Stafford could be considered through further consultations and Local Plan Review