

RESPONSE TO LOCAL PLAN PREFERRED OPTIONS CONSULTATION

Housing and Distribution

SUMMARY

1. Stone does not have the necessary infrastructure to support the proposed new housing allocation (e.g. doctors, dentists, roads, schools plus other vital services). The Council would like to see the definitive infrastructure improvements to support the town's needs.
2. The proposed development in Walton (Marlborough Road) should be resisted both because Walton has already seen significant overexpansion in the last few years with no accompanying increase in services and because access for the works traffic would necessarily be through the existing housing estates leading to damage to resident's amenity. This new addition would amount to over-intensive development. Air quality would also deteriorate as a result of both the additional proposed development and the fact that Pirehill Lane will be used by HS2 construction traffic as a haul road for their HGVs. There are 3 schools in the area, 1 middle school and 2 first schools, plus 3 nurseries, and a playing field on Tilling Drive. This raises serious concerns about the effect of this level of pollution on the large number of children who would be exposed to it on a daily basis. The environment will be decimated by congested traffic, but there appears to be no Green Plan.
3. The proposed developments on Uttoxeter Road and East of Oakleigh Court will exacerbate the existing delays caused by the railway level crossing on Uttoxeter Road and commuter traffic would inevitably be queuing at peak times. In addition, the mitigation measures required by Network Rail are considerable and costly, and will not address traffic congestion.
4. With reference to points 2 and 3 above, a formal transport assessment should be undertaken, funded by the developer but carried out by an independent organisation. The HS2 transport feasibility reports should be reviewed as part of the process, as the development off Marlborough Road should not be considered in isolation. It should also be considered that the traffic movements between Pirehill Lane and the new developments will mean residents having over five years of development related traffic, in addition to the HS2 traffic movements up and down Pirehill Lane.
5. The proposed Meecebrook Garden Development will also bring more traffic through Walton. A map of the development does not show roads in or out of this development and the town Council would like to know how this will work.
6. Flood risk and alleviation (such as at Oakleigh Court) is not detailed.
7. A current application for up to 130 new homes on Oulton Road should, if passed, be allocated as an SDL and the numbers should therefore be included in the overall requirement for Stone removing need for at least one of the 3 larger proposed allocations. In addition, land off Lichfield Road has

been approved for the development of 21 houses and 5 shops with pedestrian crossing on the Lichfield Road further adding to the stalling of traffic. This development does not appear in the Local Plan and the pedestrianised crossing will not mitigate the additional traffic and delays that regularly occur at the level crossing.

8. The ready acceptance of the desire of Black Country authorities to demand extra housing within Stafford Borough under the 'duty to co-operate' has significant implications and should be carefully reviewed. A reduction of only 10% in requested numbers would allow removal of 2 of the principal proposed developments in Stone.
9. Under the previous Local Plan, Stone had been expected to take 10% of new housing and Stafford 70% a ratio of 1:7. In the Preferred Options, Stone is proposed to take 1: 3 in relation to Stafford. The allocations therefore require revisiting and/or explanation.
10. The proposal includes development of agricultural/farmland that has been farmed for generations. This is against Government Policy when brownfield sites are available.

RATIONALE

Rationale for recommending reductions in proposed housing numbers:

Infrastructure: There is a lack of necessary infrastructure in Stone: Doctors, Dentists, Schools etc

More specifically in relation to the proposed locations:

Marlborough Rd (STO07): There has been intensive recent development to the West of Stone (Walton)...in fact in excess of 600 new homes representing a 20% expansion. This amounts to over intensive development. Access for works traffic would be through the existing housing during construction.

Uttoxeter Rd (STO16): Railway crossing limits ready access to the development and will exacerbate current issues.

East of Oakleigh Court (STO13): Railway Crossing limits ready access and will exacerbate current issues.

Additionally:

1. **A current planning application for 130 homes has not been included in the analysis and if passed should be identified as a Strategic Development Location leading to a proportionate reduction in allocations for Stone.**

22/36231/OUT Stonefield Works Oulton Road Stone Staffordshire ST15 0RS

This outline application calls for the demolition of existing buildings and redevelopment of the site for a residential development comprising of up to 130 dwellings

2. Distribution of housing:

In the table below you can see that when the Meecebrook development is excluded from the distribution percentage that the Stone share of the distribution of housing has increased to 14.6% from 10% in the previous Plan for Stafford Borough (PFSB) 2011-2031 whereas Stafford's has decreased from 70% to 46.5%

Table: Broad spatial distribution of housing

Sources of housing supply 2020-2040 (proportion in brackets)	Completions 2020-2022	Commitments	New allocations/ supply sources	Proportion excluding Meecebrook	PFSB 2011-2031
Windfall (6%)	N/A	N/A	750		
Stafford (59%)	766	5438	1,181	46.5%	70%
Stone (7%)	243	268	370	14.6%	10%
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		

3. External responses to the Issues and Options consultation

A joint response was received from the Black Country authorities. This response highlighted the functional migration and commuting relationship between Stafford Borough and the Black Country and requested that Stafford Borough Council take between 1,500 and 2,000 homes as a contribution to meeting unmet need in the Black Country. Additionally, the Black Country authorities requested that Stafford Borough consider accommodating 35-40ha of employment land which is unable to be accommodated in the Black Country.

The higher number of 2,000 has been included but without any justification. However the acceptance of the higher number has significant implications for the Borough and potentially for Stone.

The number could be reduced marginally:

1800 homes would still give 525 per year for SBC but with the removal of both:

Land at Marlborough Road (STO07)	101
Land at Uttoxeter Road (STO16)	97

Or

1770 homes would still give 523.5 per year for SBC with removal of:

Land at Marlborough Road (STO07)	101
Land East of Oakleigh Court (STO13)	131

New Local Plan Preferred Options

3. Preferred options for housing and employment land

3.1 This section outlines the council's preferred housing and employment land requirements and the reasons for their selection. That is followed by a summary of the council's reasons for rejecting the alternative options set out in the EHDNA.

Preferred housing requirement

3.2 The council's emerging preferred options is to plan for 535 new homes each year (10,700 new homes 2020-2040). This is a variant on Scenario D in the EHDNA and is referred to as 'Scenario D+'.

3.3 This option could deliver the borough's own housing needs of 435 new homes each year (8,700 homes 2020-2040) calculated in accordance with Scenario D of the EHDNA, together with 2,000 homes as a contribution to meeting unmet need in the sub-region.

Table 4: EHDNA housing growth scenarios

Option	Number of new homes each year
Scenario A Minimum local housing needs. Note rebased local housing need in 2022 is 391	408 (now 391)
<p>Scenario D Cambridge Econometrics jobs growth The number of homes that would be needed to support a Cambridge Econometrics November 2018 projection for jobs growth in the borough, assuming</p> <p>that commuting patterns don't change (i.e. there is no increase in the proportion of jobs filled by people commuting from other areas into the borough nor a reduction in the proportion of economically active residents commuting out of the borough).</p>	435 (489)
<p>Scenario E Policy on jobs growth</p> <p>The number of homes that would be needed to balance a 'policy on' jobs growth target whereby 6,500 additional jobs are created by 2040 through new employment sites at a new garden community and at Stafford Station Gateway in addition to the Cambridge Econometrics (Nov 2018) baseline projection for employment growth.</p>	647 (711)
<p>Scenario F past trends jobs growth</p> <p>The number of homes that would be needed to balance the continuation of past (2000-2018) job trends growth in the borough, again assuming no change to commuting patterns.</p>	683 (746)
<p>Scenario G 50% jobs growth boost</p> <p>The number of homes that would be needed to accommodate jobs growth that is 50% higher than the Cambridge Econometrics (Nov 2018) projection, again assuming no change in commuting patterns.</p>	540 (597)

New Local Plan Preferred Options

Stone settlement strategy

Housing

Stone town will continue to meet housing requirements by providing approximately 881 new market and affordable homes 2020-2040.

New housing development will be provided at a range of development locations as identified on the policies map, and in accordance with Policy 12 Other housing land allocations.

Economy

Employment growth and the promotion of economic diversification will be provided through the completion of existing employment land commitments as detailed in Appendix 7.

Land identified as an employment use will be protected as employment land in accordance with Policy 16 Protection of Employment Land.

Stone town centre will support Stafford Borough over the plan period as a key market town. All new development proposals within Stone town centre should enhance the appeal of the centre and encourage longer visits in accordance with Policy 19 Town Centres and Main Town Centre Uses. A more flexible approach to appropriate uses in the centre would potentially support a more diverse range of activity and encourage the use of vacant units and/or the redevelopment of underutilised buildings.

Design and Infrastructure

Development will be required to prioritise sustainable transport and, where possible, enhance or provide infrastructure for walking, cycling and public transport, in line with Policy 52.

Environment

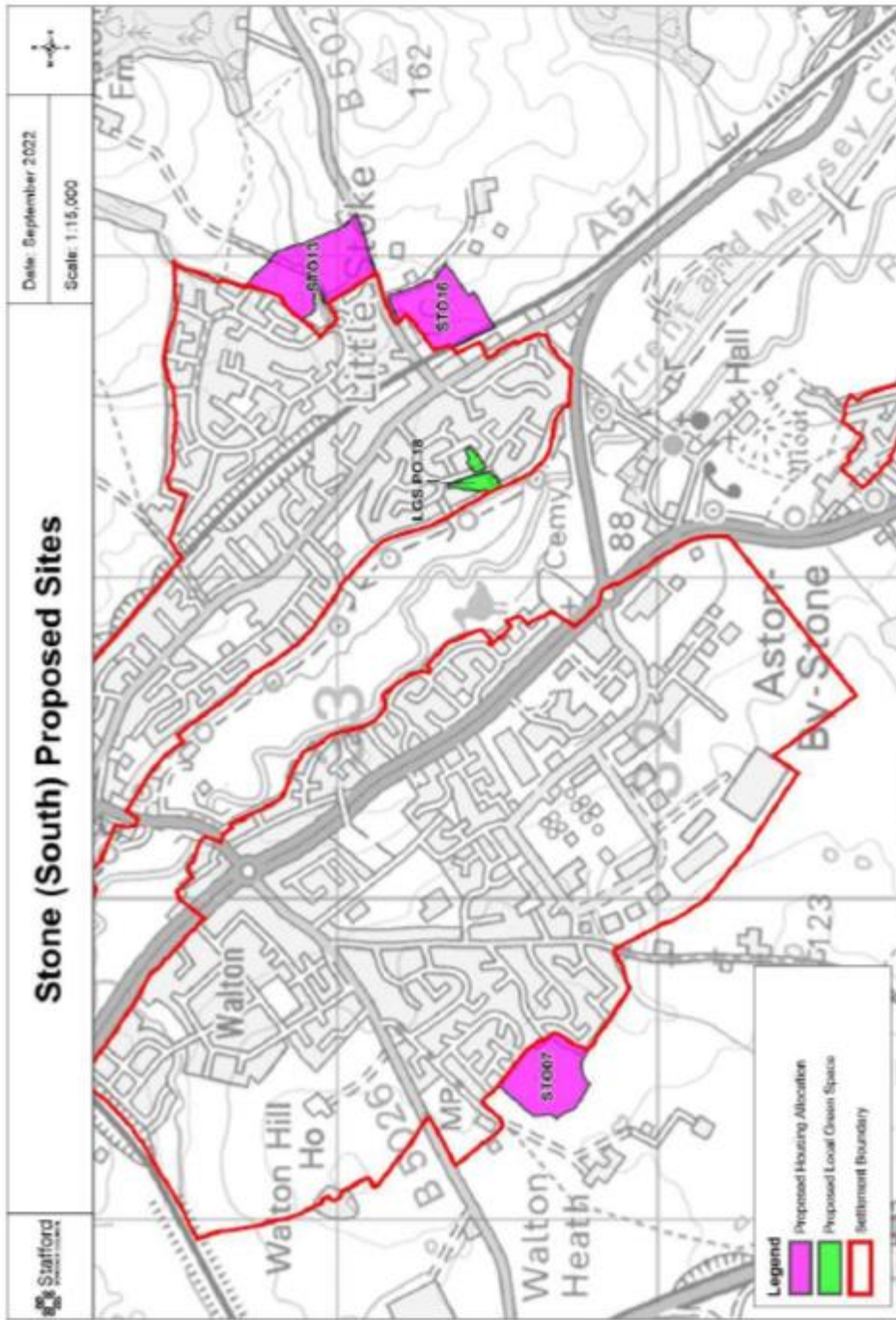
The historic environment will be preserved and enhanced to help encourage tourism within the borough, together with the Trent & Mersey canal. Stone town's unique character and heritage will be promoted. Any residential development will not damage the integrity of the Cannock Chase Special Area of Conservation (SAC) if within 15 km of this designation, nature conservation interests and Local Nature Reserves. An enhancement area will be delivered within the plan period, as indicated in Policy 15 Stone Countryside Enhancement Area

Policy 12 of the New Local Plan Preferred Options

POLICY 12. Other housing and employment land allocations

A. The following list of sites, as shown on the policies map, are allocated for housing development:

Site name	Capacity
<i>Stone</i>	
SCC Depot, Newcastle Road (STO05)	18
Land at Marlborough Road (STO07)	101
Land at Trent Road (STO08 and STO10)	20
Land adjacent to Stone Police Station (STO09)	3
Land East of Oakleigh Court (STO13)	131
Land at Uttoxeter Road (STO16)	97



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Appendix 1

Site ID: STO07

Site Name: Land at Marlborough Road

Settlement: Stone **Site Area (ha):** 4.79 **Land Use:** Housing

Potential Yield: 101 dwellings

Essential Site-Specific Requirements:

- Retain hedgerows and trees.
- Adjacent habitats to the site need full assessment, with any required mitigation as a result.
- Incorporate species rich grassland creation and / or enhancement into any design schemes.
- Create landscape buffer to wider countryside.

Proposed Access: Access from Marlborough Road needs to be checked / confirmed.



Appendix 2

Site ID: STO13

Site Name: Land east of Oakleigh Court

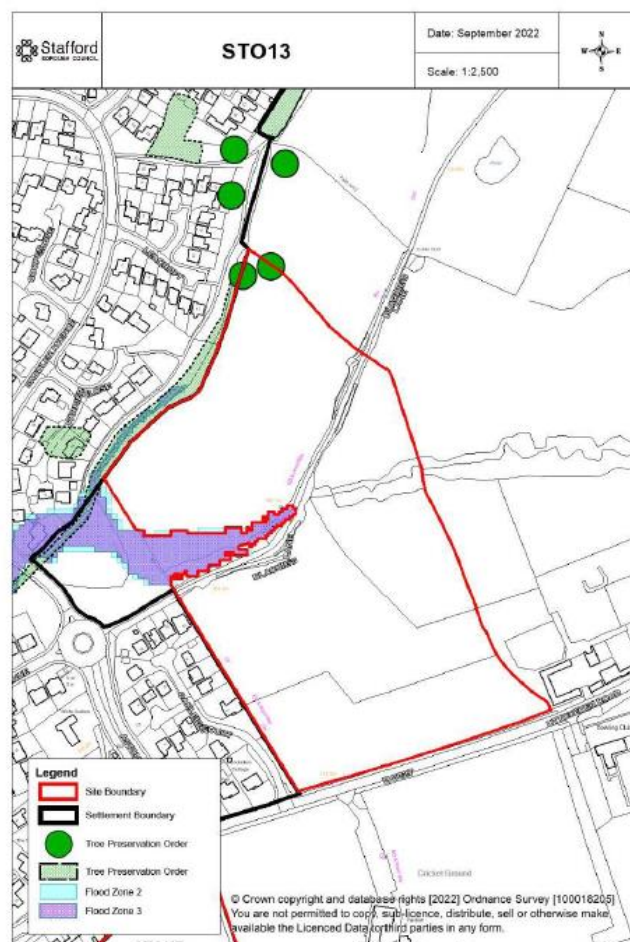
Settlement: Stone **Site Area (ha):** 6.26 **Land Use:** Housing

Potential Yield: 131 dwellings

Essential Site-Specific Requirements:

- Mitigation measures required by Network Rail. These include: ANPR – Red light traffic enforcement cameras, Vehicle activated lights, Yellow box markings on the crossing, Decking (provision of new rail decking)
- Full ecological surveys of the habitats on site should be carried out, along with any required mitigation as a result.
- Retain woodlands and hedgerows.
- Part of the site may be suitable for the implementation of natural flood management (NFM) interventions.
- An attractive frontage landscape should be established to Uttoxeter Road.
- A new, green edge to the settlement should be established along the site's eastern edge.

Proposed Access: Accessible via Uttoxeter Road.



Appendix 3

Site ID: STO16

Site Name: Land at Uttoxeter Road

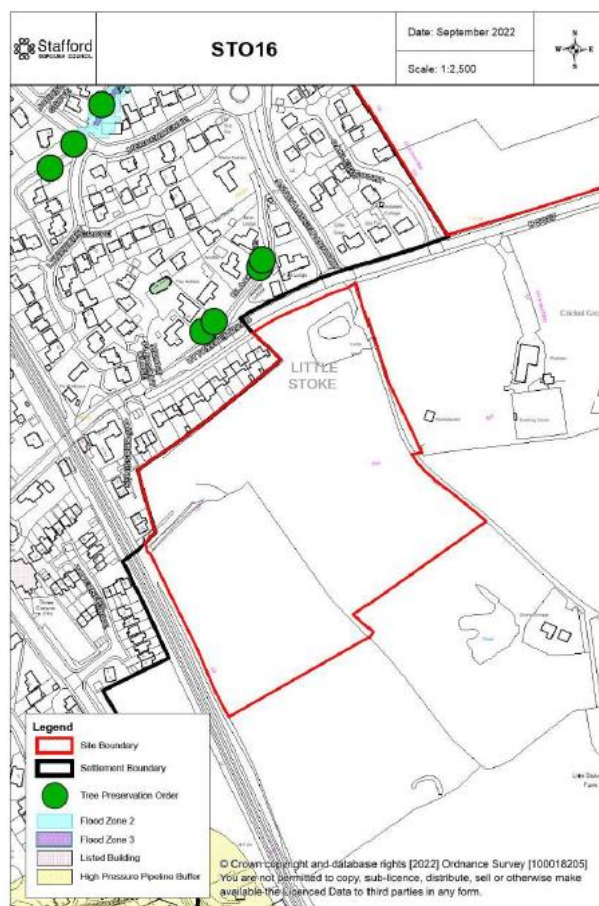
Settlement: Stone **Site Area (ha):** 4.62 **Land Use:** Housing

Potential Yield: 97 dwellings

Essential Site-Specific Requirements:

- Mitigation measures required by Network Rail. These include: ANPR – Red light traffic enforcement cameras, Vehicle activated lights, Yellow box markings on the crossing, Decking (provision of new Strail decking)
- Retain woodlands, in-field trees, hedgerows and areas of scrub or provide scrub as part of any design schemes.
- Ensure that ponds just outside of the site boundary are effectively protected and that no run-off or pollutants are allowed to enter and degrade the habitat or water quality. If possible, seek to enhance habitats.
- Incorporate species rich grassland creation/enhancement into any design schemes.
- A positive frontage should be provided to Uttoxeter Road.

Proposed Access: Accessible from Uttoxeter Road.



COMMENTS ON NEW LOCAL PLAN 2021 -2041 POLICIES

Policy 4 and 17

It is important that local energy generation and efficiency is a consideration in domestic, commercial and urban design and that a target of 0 or negative carbon footprint is incorporated in the design. It has been suggested that all new dwellings and commercial units should have solar panels fitted. There are costs and aesthetic considerations and developers will no doubt disagree but there has been huge opportunity missed in the North Stafford development where hundreds of houses have been built with no domestic generation. Solar panels pay for themselves within 7 years and greatly reduce the call on the national grid.

It is also important that strict requirements for energy efficiency in terms of heat insulation, air circulation, draught exclusion, some of which conflict are applied to any domestic and commercial development.

There is no mention of communal energy generation which for major developments must be considered. There is currently a move away from gas boilers and towards heat pumps. Air sourced heat pumps are the most cost effective solution for individual houses but ground sourced or water sourced are more effective but at greater initial cost but could be appropriate as a shared community asset.

Alongside weather dependent generation, electricity storage is important both individually and communally. This benefits householders and excess generation feeds into the grid. So it may not be necessary to try to enforce inclusion into developments.

Applications to retro fit should be viewed favourably where this does not conflict with other rules such as conservation and heritage. However, there are areas where solar panels can be fitted unobtrusively and these should be viewed favourably.

Policies 23 – 40

There is a move away from petrol and diesel transport towards electric and hydrogen. All developments both single and community should have off-street parking and recharging facilities for EVs. NB. It is not necessary to require fast charging in individual residences but power should be accessible.

For any applications where this is not possible and for larger developments consideration should be given to on street charging through purpose built chargers and alternatives such as lamppost chargers.

Policies 7 8

The design of housing, commerce, the town centre, green space and roads must be carefully designed both for the residents and the surrounding communities.

Specifically consideration must be given for the expected traffic flows, the source and destination of travel and the ingress and egress routes, and the impact on existing routes. It is likely that access to the M6 will be a major requirement and the current junctions are 14 and 15 are not conveniently positioned. A station is planned but if within the new community is unlikely to be convenient for access to Stone and Stoke on Trent. Eccleshall is easily accessible, Stone less so and the impact of a railhead at Yarnfield on access to the A34 and Stone is problematic.

Policies 23 24

It is important that housing standards are applied and enforced on all levels of housing down to first time affordable houses and to ensure that developers do not achieve affordable ratios by reducing living space to reduce area allocated to affordable housing nor by building flats at the edges or normal housing developments.

Policies 1, 6, 13

It is vital to incorporate green space within housing developments to reduce housing density provide leisure and play areas. These must be protected from speculative purchase and infill developments. There was a missed opportunity where green space initially requested within the Stone Neighbourhood plan was rejected and some of these small patches of land have had completely inappropriate planning applications submitted to the detriment of the local community.

Policy 1

All ad hoc applications for new housing must be included in the overall targets for housing provision in the area.

Service provision for larger developments must be enforced to ensure residents do not have to travel unnecessarily for day to day needs. An opportunity was missed in several larger developments where a requirement for local services was allowed to be dropped on the developers' request (I believe) for example Aston Lodge.

Policy 19 24

Accessibility is important for houses, shops, other workplaces, streets and town centres. Consideration for people with mobility issues must be incorporated into the design. These issues include: wheelchair use, vision problems, age related problems, parents with small children.

Policy 43 46

Along with managing green spaces for the benefit of the community, access to clean open water must be facilitated. This means enforcement of regulations stopping pollution of rivers and lakes and canals. This applies mainly to water and sewage companies but also to agriculture and local residents.