



Eccleshall Parish Council

Stafford Borough Council Local Plan 2020-2040 Consultation

Eccleshall Parish Council Submission

Circulation

- Stafford Borough Council: SPPConsultations@staffordbc.gov.uk
- Borough Councillors P. Jones and J. Pert

A. Overview – Meecebrook

Eccleshall Parish Council is of the opinion that the revised plans for Meecebrook are unachievable as presented in the Local Plan Preferred Options document. Substantial revised analysis and evidence needs to be completed for the current option to be proven to be feasible and more favourable than other options. **Eccleshall Parish Council recommends that:**

1. The total number of houses within scope are reduced, eliminating the 2,000 houses from other authority areas owing to lack of current evidence that other authorities are unable to deliver this in their own current provision.
2. The Borough Council focuses on large-scale developments on 'brownfield' already developed sites, including those in the original 7 options as well as others not listed.
3. The Borough Council increases the assumed provision of houses within existing communities and settlement boundaries, with a focus on cleaning up contaminated land in preference to approving construction on the best grade agricultural land as is the case with Meecebrook.
4. Any large-scale development, wherever it is located within the Borough, must have key infrastructure improvements in place before the first house is built, or compensatory schemes in place in nearby communities that are all currently over capacity (including schools, medical services, road, waste water, sustainable transport routes, and employment capacity).
5. Any large-scale development must have adequate soil, minerals, flood, and hazards surveys completed prior to selection as a preferred option, owing to the risk to viability of the Local Plan should these studies be undertaken later in the process and prove the site to be unsuitable.
6. Eccleshall Parish Council has reviewed the consultation submissions of Yarnfield & Cold Meece and Chebsey Parish Councils, and wholeheartedly endorse and support the conclusions of those submissions. The Council particularly wishes to draw attention to the level of detail on the railway station non-viability and the drastically altered character of the area, as well as the lack of local consultation with stakeholders that, if undertaken at the right time, could have helped the Borough avoid the wasted opportunity and money that the Meecebrook project currently represents as presented.

B. Minerals and current land profile:

1. It is noted that the Policy and Proposals Map for the Minerals Local Plan for Staffordshire, published by Staffordshire County Council, lists part of the land as a safeguarded area, and development on this land will sterilise minerals that currently lie underneath Meecebrook. We see no evidence that an impact assessment was completed prior to Meecebrook's selection as a preferred option. This assessment is required. The Local Plan cannot continue at present until this assessment has been completed to the satisfaction of that authority.
2. Some of the land close to the Swynnerton Road is a known radon zone, and we see no assessment of this risk. Meecebrook should not be progressed until this has been completed.
3. Much of the land within the zone is prime agricultural land (grade 2 and 3) with phosphates and other nutrients present. The risk of causing a nutrient imbalance in the Meecebrook and River Sow, both significant (EA) rivers and close to headwaters, needs full evaluation before the Meecebrook site can proceed as a preferred option. Taking prime agricultural land out of food production has an impact on the local food supply, yet the evidence does not contain any analysis of how this can be redressed with Meecebrook as an option. Other options have a lower impact on the food production capacity of the borough, and these sites (Redhills, Hixon) would better meet the current Borough policy in this matter. Potential impact should have been, and needs to be, properly assessed – with comparisons to the other comparable options for development – prior to proceeding with Meecebrook as the preferred option.
4. Adjacent to Hilcote is contaminated land, shown on the Meecebrook plan as suitable for housing. If this land remains in the plan then adjustments are required to establish a perimeter of legal radius from this contaminated land, or works undertaken to decontaminate the land, which would be less desirable for development due to these requirements and decontamination costs. It is noted there are other brownfield sites within the options document (Seighford, Hixon, and others) that are also contaminated and would benefit from clean-up – these would become more viable in comparison without the need to remove prime agricultural land from food production and would be more preferable and more in line with Borough Policy than Meecebrook.
5. Developing 1125 hectares of greenfield site takes the Borough Council further away from its Economic Policy on Agriculture (SP6-ii, SP7-ii, SP7-iii of the current Borough Policies, and proposed Policy 20 of the new Local Plan). We see no balancing plans in the rest of the Local Plan to address this, and Meecebrook should not proceed until this is in place. It must be demonstrated that the impact of Meecebrook is more than compensated for by enhanced agricultural activity elsewhere in the Borough.

C. Railway Station

The Railway Feasibility Report is an inadequate basis to evidence a viable and realistic proposal for delivery of a railway station. Without the railway station the entire Meecebrook proposal becomes unsustainable and undeliverable, and an accurate feasibility study is vital.

Reliance on this puts the Local Plan at great risk and without this station, the Local Plan will not meet housing needs. Other options for housing development are less risky due to reduced dependence on railway access. For example, Hixon and Redhills have direct access to A roads, and are between multiple settlements with employment prospects, reducing journey impact on key road junctions in

comparison with Meecebrook's road access, which is highly dependent on the A34, located several miles from the edge of the site.

Other key points to note include:

1. The station cannot open until at least after HS2a is opened, which is currently forecast for 2033-5. The Local Plan timescales list the station opening in 2026 and there being 133,281 passenger journeys originating in the "Garden Village" by 2030, yet the very first house will be built only in 2031. The combination of unrealistic timescales and predictions, coupled with the restrictions imposed by the delivery timeline of HS2 brings the feasibility of the report into question. Meecebrook is no longer a 'village' but just a "settlement" with a reduced source of passengers. The cost of the station is listed as £102M, yet forecast revenue is only £69M in 60 years. These facts further make the railway feasibility report – only recently published in July 2022 - inadequate and it should be discounted as invalid evidence.
2. Regardless of the inadequate Railway Feasibility Report, there will be no adequate passenger usage for the entire period of the Local Plan to 2040 to justify a new station, and at the same time, unless the station is built by 2031, the Meecebrook Plan does not have adequate road provision for car and other journeys to handle the growing need as Meecebrook grows to 3,000 dwellings by 2040. The Meecebrook option should have addressed these forecasts prior to being selected as a preferred option, and these constraints must be addressed in order for Meecebrook to be considered viable.
3. The locations for the North and Central station options are within government-designated flood risk areas and unsuitable for development. There is no significant parking within the plan for the station, yet it is highly optimistic – if not naïve – to assume that passengers will not park on the residential streets of Meecebrook instead, given the anticipated passenger numbers from the station's catchment area. This must be included in the plan for it to be viable, which detracts from Meecebrook's ability to achieve self-sustained housing, retail, and employment goals.
4. The passenger survey underpinning the station viability is two decades old and invalid given current passenger journey habits. It must be repeated to include new patterns such as working from home, leisure travel to rural locations, and the success factors for rural parkway stations. A vital component of any new station study must include a review of equivalent case studies such as new rural stations on main railways, e.g. Ebbsfleet. This is missing and further proves the railway feasibility report is an inadequate basis for proceeding.
5. Network Rail has acknowledged that they have not been asked to take part in any of these studies and has not performed any feasibility studies at all at this stage. There is no known location where a new railway station has proceeded to National Rail approval on the basis of only 6,000 dwellings within 20 years, without any provision for parkway, interchange, or employment factors present as is the case with Meecebrook. The proposed station does not appear to match national or regional railway strategy, and evidence to show how it does support regional and national strategic goals are required for it to be deemed feasible, viable, or practical. There are no 'pull' factors that would support Meecebrook, and it is therefore an entirely too risky proposal upon which to achieve such a large proportion of the need of the Local Plan.
6. The railway station is therefore not viable based on the evidence provided and requires better evidence for it to proceed as envisaged. The suitability of Meecebrook as a location

for 3,000 houses by 2040 is undermined and too risky to be a preferred option for such a large proportion of the Local Plan's required housing allocation.

D. Other Journey types

The Meecebrook Plan and Local Plan do not contain adequate provision for non-railway journeys. Local roads are at capacity during current peak times, especially at key junctions such as at the A34 at Walton. With 40% of anticipated journeys to Stoke (not viable via railway due to multiple connections required to access employment sites within the city), this would exceed the capacity of northbound roads through Yarnfield, Swynnerton, and the A34. Lanes south through Chebsey and Eccleshall are not suitable for commuting, and employment within the Stafford area is scattered and not a realistic option for public transport. Enhancing the railway bridges to handle eastward commuting would require a full appraisal, not present in the evidence provided, yet employment opportunities westward are minimal. Without these, the Meecebrook site is only possible with a railway station since there is not enough employment on site sufficient for the anticipated population levels. Without the railway station the Local Plan would require strategic transport designations to support the expected travel patterns. The Meecebrook Plan must contain sufficient evidence that private journeys can be accommodated on current or improved roads.

The proposed M6 junction (para 9.2.4 of the SA of the Stafford Borough Local Plan (Interim report Oct 2022) is a mistake, undeliverable, and was ruled out by the Select Committee for HS2 in 2018. The resultant increased traffic on local roads led to Highways England highlighting the junction as a requirement, and its support for Meecebrook was predicated on the junction.

Public transport connections east of Eccleshall are sparse, and those to the west and north of Eccleshall are non-existent and considered economically unviable. Until Meecebrook has developed sufficiently to supply enough passengers, public transport would continue to be unprofitable and require public subsidy. The Meecebrook Plan must contain sufficient evidence that road-based public transport needs have been duly considered.

The Meecebrook Vision contains an aspiration for sustainable transport corridors, and the Local Plan fully supports this vision. However, the only cycleway shown on the map fails to proceed beyond Yarnfield, and there is no provision for cycleways to local communities such as Eccleshall, Stone, or Stafford via Chebsey. The sustainable transport provision beyond the Meecebrook boundary must be a network for it to be effective and must be within the broader Local Plan for it to be realistic.

Policy 46 needs to be adjusted to include details of this – specifically 46.B.3 needs to specifically state connections to the higher-tier communities, and 46.D.C should have a 4th bullet to set a distance per dwelling (with larger developments requiring longer-distance cycling, and smaller number of dwellings to have shorter-distance and walking provision to local community centres). With this provision in place, the Meecebrook Vision becomes integrated with the wider Borough Local Plan policy. Without it, Meecebrook's evidence demonstrates inadequate provision for non-vehicular connections to higher-tier settlements (Stone and Stafford) and designated town centres (including Eccleshall).

Meecebrook's employment land designation, if completed, would vastly increase commercial vehicle journeys within the area, yet no adequate analysis has been conducted on the feasibility of such journeys so far from an M6 junction (14 and 15 are deemed too far by those who have vacated Raleigh Hall, which remains partially under-utilised).

E. Self-contained community

The optimistic aspirations for a self-contained garden community are wholeheartedly welcomed, however the evidence to support this aspiration is completely lacking and entirely hinges on the presence of a railway station, which itself relies on an inadequate railway feasibility study and unrealistic timelines.

The Meecebrook Vision is for a self-contained community, yet the edge of Meecebrook is 700m from Eccleshall, an established community with a vibrant social and economic identity. Without established safe walking connections to Eccleshall this will generate vehicle journeys. Without specific protections for the intervening land there is great risk of settlement coalescence. Regardless of the solution provided, Meecebrook as a location needs to be adequately compared with other site options such as Hixon and Redhills with the risk of coalescence highlighted and appraised.

Meecebrook's development is approximately half located within Chebsey Parish. Chebsey as a village is a designated conservation area and has a risk of settlement coalescence with Meecebrook. The Meecebrook Plan does not sufficiently address this risk. It is noted that other designated options have a negligible risk of settlement coalescence with a conservation area village.

The Meecebrook Vision document recognises that until sufficient development has occurred, nearby existing local infrastructure will bear an increased load, however the Meecebrook Plan does not provide sufficient analysis of this. Appendix 9 of the Preferred Options document states that these evidence documents will be provided only later, under Regulation 19 stage, yet without an appraisal of all the options, the designation of Meecebrook as a preferred option has no evidential basis with regard to how existing infrastructure will cope. With sewage services, GP surgeries, schools and flood capacity all running at or above maximum capacity in the area, Meecebrook would require significant investment prior to housing development starting. This is not the case with Redhills (where extra capacity is already underway), or with Hixon or Gnosall (where multiple options exist to spread increased demand until settlement growth allows settlement infrastructure).

Biodiversity review - Policy 47 seeks to increase biodiversity by 10%, yet Meecebrook will harm this objective since it is now a greenfield project. Key housing development projects in the Borough need to include a greater proportion of brownfield than is available at Meecebrook to meet the target of Policy 47. Hixon has a greater proportion of brownfield sites, and as mentioned before, sites such as Seighford, which require decontamination and other preparatory work, would have a far greater positive impact on the environmental biodiversity than Meecebrook, and are preferable.

F. Housing Numbers

Without the contribution by Meecebrook of 300 houses per year from 2031, the Local Plan is unable to meet the commitments to housing contribution. However, Meecebrook as a site brings significant challenges and assumptions based on inadequate analysis, bringing significant risk to the viability of the Local Plan as a whole. To reduce the risk to the viability of the Local Plan, the options should be re-evaluated and needs met from other sites that have fewer risks and issues, but similar opportunities such as:

- A railway station near Hixon
- Established road and motorway connections near Redhills
- Existing cycleways and multiple catchments for services such as those present at Gnosall and Hixon.

The Parish Council notes that in 2020 the Black Country Authorities supported Stafford's plan to take extra housing needs it could not fulfil within their area. However, since then the Meecebrook capacity within the Plan period to 2040 has drastically reduced to 3,000 and the Black Country Authorities have disbanded as a group, this support is not properly evidenced. For the Stafford Local Plan to proceed with supplying housing to meet the needs of other authorities, the Parish Council would need to see properly evidenced and recent acknowledgement of this from neighbouring authorities, reflecting the new situation (reduced capacity at Meecebrook with no M6 junction). The evidence would also have to acknowledge the risk inherent in the assumption around a new railway station, as without it, Meecebrook is a highly impractical location for Black Country connections, and Redhills would be a far superior location due to the M6 junction.

G. Flooding

Building a large development on land where rainfall runs into recognised flood risk areas such as the River Sow and the Meecebrook requires a comprehensive Topographical Survey. This needs to adequately assess the works required to ensure Meecebrook contributes positively to the requirement that the land is able to manage more water runoff than is current, as per the Borough Sustainability Policy.

Eccleshall's sewage and drainage capacity is inadequate to current needs. The measures required to ensure Meecebrook does not contribute to additional issues must be quantified as part of the economic investment required for a settlement in this location. The Severn-Trent Water drainage survey of Eccleshall (2021-2023) must be completed and remedial works agreed before the true investment requirements for Meecebrook can be evaluated. This caveat needs to be included in the Local Plan to ensure risks to the Meecebrook site viability can be properly evaluated, when compared with other options that have a less complex sewerage and drainage situations, such as Redhills.

H. Summary

The Meecebrook site would have been an improved proposal if the MOD site had been included and the M6 junction allowed. Once these factors were removed from the proposal, the Meecebrook site became an inadequate contributor to the housing requirements, and other options should be re-examined in a favourable light. The designation of Meecebrook as the preferred option is not supported by a robust initial evidence base, and further evidence is lacking and should have been completed before the selection of a preferred option was made.

I. Other Policies

Green Belt: Policy 5 does not recommend additional green belt designations to encircle Stone, Eccleshall, etc. Given the pressure that Meecebrook may bring, and the stated desire to reduce settlement coalescence, we recommend that the Local Plan contain a provision to extend Green Belt to ensure the borough's settlements maintain a rural aspect, minimising ribbon development and undesirable development locations.

Policy 6 (Neighbourhood Plans) - Meecebrook is overriding the stated preferences of the local community as evidenced in the existing settlement boundary for Eccleshall Parish agreed by local referendum. There is no evidence that local opinion has changed, and all three local Parish Councils are objecting to Meecebrook's currently proposed location for a number of valid reasons. Eccleshall

Parish, along with Yarnfield & Cold Meece Parish, has been a key contributor to the delivery of the current Local Plan objectives in excess of the Plan's targets. The resulting load on existing infrastructure should not be further exacerbated by the Meecebrook settlement until such time as the current infrastructure has received the necessary investment to have spare capacity. Since this would require significant public investment prior to any development of Meecebrook starting, this seems unlikely. Almost every other option reviewed would have better infrastructure opportunities.

Policy 10: Stafford Borough Council should adhere to the long-standing policy of not supporting large-scale development west of the M6, and incorporate this into this Local Plan, to preserve the essentially rural and agricultural nature of the western part of the borough. Settlement boundaries can then be used to ensure development is possible and encouraged in desired places.

Policy 12 relies on Policy 7. Since Meecebrook is a risky site upon which to assume large-scale development, Policy 7 needs to be enhanced to be able to handle the uncertainty or the entire Local Plan is at risk from one large development's feasibility. Allocating a proportion of the housing need to allow hamlets and small villages to have natural growth (currently banned under Policy 26) will assist these isolated communities to remain viable and simplify the process of small-scale development in a rural setting. A simple calculation based on number of settlements below tier 5 and an assumption of small-scale proportional growth to 2040 will yield additional housing allocations without impacting local infrastructure.

Policy 17 fails to take account of the changing nature of employment need. For example at Raleigh Hall, existing land set aside for employment is underutilised due to modern transport requirements and inadequate road connections. This policy should recognise and support the need to further develop and enhance existing employment locations as a higher priority than the development of new sites at greenfield locations, including road development and other infrastructure needed for modernisation.

Affordable Housing (Policy 23): How can an isolated greenfield site such as Meecebrook or any other greenfield and rural location carry 40% affordable housing? Greenfield sites lack the connectivity to local services and employment to make this target achievable. This target allocation should be re-thought with regards to Policy 52 (transport) to ensure greenfield developments are required to have transport infrastructure in place and thus make their affordable housing proportions achievable.

Policy 38: Telecommunications infrastructure must be specifically treated as a prerequisite for new development sites alongside other utilities such as electricity, water, and drainage. Policy 38 should be adjusted to make this explicit with regards to full fibre broadband.

Policy 46: New cycling routes and similar should appear in Policy 46 and the Policies Map but is not included.

- Policy 46. 46.A.1, 46.B.c both suggest this but the local Plan needs to have actual areas and routes proposed, in coordination with the Strategic Transport Authority (the County Council).
- 46.C does not include sustainable transport and this seems to be a missed opportunity.
- The Parish Council recommends, given that two major developments are Meecebrook and the Stafford Gateway project, the Local Plan would be improved if it were to designate a sustainable transport corridor between the two locations. This could extend via Yarnfield to

Stone and create a spoke cycleway that would additionally benefit all nearby communities along and near the route.

- If Hixon or Redhills (East and North) undergo development, the same approach could be made to align a radial cycleway to these locations, building on the success of the Isabel route and extending beyond the town boundary.

Parking: Policy 50.C.2 and Policy 53 set objectives for parking and EV provision but there are no details on criteria for best locations, distance to public EV or parking for town centres and residents, nor anything the Parish Council can use to determine a town car park location. This policy should be adjusted to include EV charging provision for urban residents who do not have a driveway and will require publicly-provided overnight charging capability within a reasonable distance to their street. This policy should set out the criteria that would meet the policy's objective.

Policy 52-A needs to reflect that connections are specifically to designated town centres and community infrastructure.

- 52.A.2 should specifically link the size of development to the distance that is required.
- 52.A.3 should make specific reference to public transport connections (e.g. bus stops).
- 52.A.5 and 6 should define 'safe', since in-road cycleways, and unpaved unlit walkways, would not be acceptable provision for new housing developments beyond a certain size.
- 52.A.6 - 'All' is a wide definition and may be unsuitable – for example 'all' could include unsupervised toddlers, but it is unreasonable to make all access safe for all potential users. It would be better to leverage national policy wording to ensure this policy is both reasonable and offers as wide a level of access as is relevant (e.g. removing stiles and inserting gates, as per Staffordshire County Council Policy).