

Local Members' Interest	
Mr. M.J. Winnington	Gnosall & Doxey
Mrs. M.R. Compton	Stafford Central
Mr. I. Hollinshead	Stafford North

PLANNING COMMITTEE 05 November 2015

COUNTY DEVELOPMENT

Application No. Stafford Borough: S.15/06

Date Received: 15 June 2015

Date Revised/Further Details Received: 17 August 2015

- Amendments to the planning application boundary (relating to relocation of the main site compound area and flood compensation area)
- Viaduct – revised details
- Amendment to signalised pedestrian crossing at Doxey Road (East)
- Addendum to Environmental Statement

Date Revised/Further Details Received: 02 October 2015

- Amendment to the description of the development
- Amendment to the planning application boundary (to show all land forming part of the application edged by a red line)

Proposed Development

The Cabinet (Staffordshire County Council) application to construct the new Stafford Western Access Road including: a low viaduct and bridge, landscaping works and the demolition of existing industrial buildings on land between A34 Browning Street/Foregate Street and Martin Drive, Castlefields, Stafford; highway works along and adjacent to Doxey Road, Greyfriars Place and Browning Street/Foregate Street; a flood compensation scheme within Doxey and Tillington Marshes SSSI at Creswell; and, new pedestrian and cycle crossing facilities on Martin Drive and Kingsway, Castlefields, Stafford.

Planning Committee Report Update

This report is an update of the report that was deferred from the Planning Committee meeting on 01 October 2015. The report was deferred as the applicant sought to make amendments to the planning application to ensure that it could be properly determined. The amendments relate to the following:

- The description of the development was changed to provide a full description of

the development. The amendments made are shown underlined in the amended description below

The construction of the new Stafford Western Access Road to include: a low viaduct and bridge, landscaping works and the demolition of existing industrial buildings on land between A34 Browning Street/Foregate Street and Martin Drive, Castlefields, Stafford; highway works along and adjacent to Doxey Road, Greyfriars Place and Browning Street/Foregate Street; a flood compensation scheme within Doxey and Tillington Marshes SSSI at Creswell; and, new pedestrian and cycle crossing facilities on Martin Drive and Kingsway, Castlefields, Stafford.

- As part of the proposed development would take place within the highway which had been described in the application as being carried out under permitted development rights by the Highway Authority and were shown by a blue line on the plans, the application boundary area was amended to show all of the land now forming part of the application edged by a red line. An amendment was also made to include two proposed pedestrian and cycle crossing facilities on Martin Drive and Kingsway, Castlefields, Stafford within the application area.

It is important to note that the changes to the application do not materially change the proposals or the consideration of the environmental effects as the Environmental Impact Assessment looked at the scheme as a whole.

Background/Introduction

1. The preferred route has been identified as key infrastructure in the Plan for Stafford that was adopted in June 2014. The full route is planned to accommodate future development traffic in Stafford and, in particular, it is proposed to provide the access arrangements to proposed development sites in the West of Stafford at Burleyfields and Castlefields.
2. The Strategic Case for the Stafford Western Access Road is based on the need to accommodate new development to the west of Stafford as proposed in The Plan for Stafford, and in particular with regard to its policies (Policy Stafford 1 – Stafford Town), and (Policy Stafford 3 – west of Stafford).
3. A western access route between Foregate Street and Martin Drive is supported in the Stoke-on-Trent and Staffordshire Local Enterprise Partnership's Strategic Economic Plan (LEP) and was protected by the County Council in March 2008. The final preferred route was approved by the Cabinet in May 2010.
4. The Growth Deal announcement in July 2014 committed to building the scheme and the strategy for acquiring land was agreed by the Cabinet in November 2014. Cabinet permission to submit the planning application was approved in May 2015.
5. The applicant considered a number of alternatives to the proposals and consulted upon them with the community and businesses (events in December 2009 and January 2010) when initial scheme options were considered. A number of stakeholders were consulted including Stafford Borough Council, Network Rail, sustainable transport groups, utility groups, land and business owners, and

environmental organisations including Natural England, the Environment Agency and Staffordshire Wildlife Trust; letters of support from stakeholders are appended to the application. The applicant provided a Statement of Community Involvement setting out the consultation process carried out since 2009.

Summary of Proposals

6. Planning permission is sought for the construction of the Stafford Western Access Road (SWAR) from Greyfriars Place to Martin Drive, associated demolition of buildings at St Gobain (office buildings), and associated flood compensatory storage within Doxey and Tillington Marshes Site of Special Scientific Interest (SSSI). It is also proposed to construct two pedestrian and cycle crossing facilities on Martin Drive and Kingsway (see Plans 1 and 2).
7. The SWAR scheme would consist of a 1.2km 7.3m wide carriageway road between the A34 Foregate Street and Martin Drive with a 3m wide shared footway/cycleway to be provided with signage and lighting, and subject to a 30mph speed limit.
8. The SWAR scheme would be delivered in three sections (see Plan 3):
 - Section A: A34 Foregate Street to Timberfield Road/Doxey Road Junction (approximately 700 metres) is planned to commence in April 2016 and to be completed by end October 2016 (subject to land acquisition);
 - Section B: Along Doxey Road from Timberfield Road up to and including Doxey Road Rail Bridge (approximately 160m) is planned to commence in September 2017 and to be completed by end January 2018 (subject to land acquisition); and,
 - Section C: Doxey Road (west of the Rail Bridge) to Martin Drive, Castlefields (approximately 320 metres) is planned to commence in January 2018 and to be completed by end September 2018 (subject to the developer contributions being available and subject to land acquisition).
9. The key elements to the SWAR scheme include:
 - A34 improved signal junctions at Browning Street and Foregate Street;
 - New bridge over the River Sow;
 - Viaduct over the River Sow flood plain;
 - New roundabout at the junction with Doxey Road and Sainsbury's;
 - Realignment of Doxey Road;
 - The provision of a new service road for Doxey Road properties;
 - Enhancements to the West Coast Main Line rail bridge;
 - Roundabout at new junction with Doxey Road;
 - At-grade crossing of redundant rail sidings; and,
 - Fourth arm at existing Martin Drive junction.
10. In addition to the construction of the new access road, it is proposed to carry out flood compensation storage works. Two areas are proposed for flood compensation:
 - Storage Area 1 – within an area of the Tillington and Doxey marshes approximately 2km north of the new access road at Creswell. The compensation

works include excavation of an area of elevated land situated north of the floodplain from which approximately 9,800m³ of material would be excavated and deposited in an existing adjacent wetland area referred to as the 'Creswell Flash'.

- Storage Area 2 – an existing car park situated to the west of the route from which approximately 8,000m³ of material (consisting of bound material/tarmac) would be generated during excavation. The waste material would be used in construction or where appropriate removed for disposal elsewhere. It is proposed to return this area for use as floodplain within the SSSI as a mix of wet woodland and scrub with associated swamp and ditches as habitat creation.

11. Amendments to the proposals, submitted on 17 August 2015, included:

- *Amendments to the planning application boundary* – reduced to avoid conflict with consented development for housing at Wooton Drive, Creswell;
- *Amendment to the design of the viaduct over the River Sow and floodplain* – reduced from a 15 span to a 6 span structure over the River Sow to the boundary of the northern long stay car park and lorry parking area. The new road either side of the viaduct would be raised on a vertically retained piled embankment. The change would negate a need to provide security fencing and replaces it with buff coloured blockwork;
- *Amendment to the signalised pedestrian crossing at Doxey Road (east) roundabout* – to incorporate a stagger. This change would result in an increased width in the footprint of the scheme by 3m affecting the area of land permanently lost from the Doxey and Tillington Marshes SSSI;
- *Relocation of the main site compound area* – relocated from the proposed area at the north eastern extent of the scheme to an area of land on the St Gobain site; and,
- *Addendum to the ES* - to address the environmental impacts and effects of the additional/amended works.

Construction Phase

12. Construction operating hours are proposed to be 07.30 to 17.00 (Monday to Friday) and 07.30 to 13.00 (Saturdays). Evening, night time and early morning working particularly for carriageway surfacing is proposed between the hours of 19.00 and 06.30. The hours of working are inclusive of half hour start up and close down periods

[note: EHO confirmed that operating hours up to 18.00 were acceptable and the applicant confirmed that they would therefore wish to increase the hours to give them more flexibility].

13. The applicant proposes to control and minimise the environmental impacts of construction through good site practice and dedicated environmental management and would provide details of how the construction would be managed in a Construction Environmental Management Plan (CEMP). An Outline Construction Environmental Management Plan (OCEMP) accompanies the application which is

proposed to form the basis for an adopted construction stage CEMP to be developed with the contractor.

14. The local highway network affected by the proposals would be the A34 Foregate Street and the Doxey Road. The development would affect public rights of way (Public Footpaths Nos. 27, 40 and 46), and a right of way (MCN55) which is part of the National Cycle Route would also be temporarily affected; temporary diversions are proposed. The construction operations are proposed to be carried out to ensure that the impact of the development of the highway infrastructure is kept to a minimum, that the infrastructure is developed using sustainable construction methods and principles, and that the infrastructure is developed safely and in accordance with relevant health and safety legislation to minimise risks to the workforce and members of the public.

Operational Phase

15. The applicant proposes that environmental impacts of the road operation would be controlled and minimised by design and the incorporation of appropriate mitigation measures. The applicant also proposes to carry out monitoring post implementation.

Landscaping

16. Landscaping mitigation and enhancement including conversion of existing car park areas to natural habitat within the SSSI are proposed. Soft landscaping comprises of both highway enhancements and mitigation planting. Additional ecological enhancements in the form of wet woodland and scrub adjacent on Doxey and Tillington Marshes are proposed to provide visual mitigation along with planting in Castletown to provide visual enhancement for residential properties.

Undertakings offered to be secured as part of a Memorandum of Understanding

17. The applicant has offered to carry out a number of undertakings within a Memorandum of Understanding (MoU). The latest amendment to the planning application boundary means that proposals that were previously outwith the planning application site boundary now fall within it and as a result can be controlled by conditions of the planning permission rather than be secured by way of the MoU. The undertakings that remain to be secured by the MoU are as follows:
 - a) To give responsibility for the management of the disturbed and newly created habitats within the SSSI to Staffordshire Wildlife Trust who already manage the SSSI.
 - b) To carry out new signalised pedestrian crossing facilities at the junction of the A518 Newport Road and West Way, if required following post scheme monitoring.
 - c) An undertaking to work with Castlefields Residents Association to develop an optimal solution for the area if evidence shows that on-street parking is causing an obstruction to traffic flows or an amenity issue.
 - d) An undertaking to carry out post scheme monitoring of the actual impact of changes in traffic flows and speeds on the wider network and if necessary to

implement traffic management and safety measures in the event that it is deemed necessary.

- e) An undertaking to carry out monitoring and evaluation of the scheme by collection of travel data collected one year and five years after opening for comparison with forecast predictions for the following:
- Peak hour traffic flows on key routes including Newport Road, Foregate Street, Chell Road, Station Road and Doxey Road;
 - Peak hour journey times on the routes assessed in the Traffic Forecast Report provided as an Appendix to the Environmental Statement;
 - An assessment of peak hour delays and reliability on key routes. This is currently calculated using Department for Transport GPS Trafficmaster data;
 - Traffic volume and speed characteristics will be used as appropriate to assess the change in greenhouse gas emissions as a result of the scheme; and,
 - Accident data will be regularly reviewed and any potential issues will be reported.

18. In addition to the undertakings in paragraph 17 above, the applicant has also agreed to the following undertakings in response to comments from consultees:

- a) To make provision for Network Rail to access the West Coast Main Line and remaining section of their siding, subject to securing the necessary land (freehold) required to deliver Section C. The access will be used to accommodate transit van sized vehicles and be completed with a turning area/parking for three van sized vehicles. It may also be necessary to provide a temporary access arrangement until a permanent solution is developed alongside the long term proposals for the land. Until such time, existing access arrangements will remain unchanged.
- b) To endeavour to agree with Western Power Distribution and other utility providers their requirements during construction of the SWAR and maintenance of their assets thereafter;
- c) To review air pollutants data post implementation of the SWAR in order to ratify modelled values; and,
- d) To provide a Landscape and Ecological Management and Monitoring Plan (LEMMP) for the disturbed and newly created habitats within the SSSI, including 5 year monitoring of the effects on the disturbed and newly created habitats within the SSSI, on the River Sow, on protected species and wintering birds within the SSSI, and, at the SWAR protected species crossing point.

Environmental Statement

19. The planning application is supported by an Environmental Statement (ES) which sets out the full scope of the proposed highway works and assesses the potential impacts of the development on the environment. In addition, an Addendum to the ES was received to identify the environmental impacts and effects of the additional/amended works as set out in paragraph 12. The following key documents

accompany the application:

- Environmental Statement (ES) and Addendum;
- Non-Technical Summary;
- Statement of Case;
- Design and Access Statement;
- Planning Policy Statement;
- Utilities Statement;
- Statement of Community Involvement;
- Planning Obligations Statement; and
- Flood Risk Assessment.

20. The topics/issues considered by the ES are as follows:

- Ecology and Nature Conservation;
- Drainage and the Water Environment;
- Landscape and Arboriculture;
- Cultural Heritage;
- Noise and Vibration;
- Geology, Soils and Contamination;
- Air Quality;
- Pedestrians, Cyclists, Equestrians and Community Effects;
- Vehicle Travellers;
- Cumulative Effects;

21. The findings of the ES (and the environmental information subsequently received) are summarised in Appendix 1.

Site and Surroundings

22. The SWAR scheme is situated within the urban area of Stafford. The new access road would pass through the wards of Common, Forebridge, Tillington and Rowley.

23. The application site is crossed by public rights of way, the national cycle network, the River Sow and its tributaries (Pans Drain and Doxey Drain), the West Coast Main Line and rail sidings (currently proposed to be decommissioned). Land uses surrounding the site include scrubland, areas designated with environmental protection (Doxey and Tillington Marshes SSSI), car parks, existing industrial, residential and retail areas and major development sites.

24. Including land for which the County Council is the Highway Authority, the County Council owns 13% of the land requiring planning permission, with Stafford Borough Council owning around 5%. Of the remaining land within the red line boundary area (around 6%) would need to be acquired from private landowners and the remaining 76% would be accessed temporarily if necessary, by agreement with the land owner in order to carry out the proposed development.

Relevant Planning History

25. The key driver for the Stafford Western Access proposals is the housing development at Castlefields now allocated within the Plan for Stafford (ref: Policy

Stafford 3).

26. A corridor to allow the construction of a new road between Martin Drive and A34 was protected by the County Council in March 2008. This route (Option F) was considered against the other interventions within the Options Assessment Report and in 2010 Option F was identified as the preferred option for the Stafford Western Access Route which forms the basis for this planning application.
27. The preferred route (Option F) has also been identified as a priority in the Stoke-on-Trent and Staffordshire Local Enterprise Partnership Strategic Economic Plan and in July 2014 funding for the Stafford Western Access Route was announced in the Local Enterprise Partnership's Growth Deal.

The development plan policies and proposals relevant to this decision

28. The relevant development plan policies are listed below:

a) [The Plan for Stafford Borough](#) (adopted 19 June 2014):

- Policy Stafford 1 – Stafford Town: delivery of 7,000 new homes including the West of Stafford linked to the delivery of the Western Access Improvements from Martin Drive to Doxey Road and strengthening of Stafford's role as the principal transport hub through delivery of the full Western Access Improvements, including the Western Access Route, between Martin Drive and A34 Foregate Street.
- Policy Stafford 3 – West of Stafford: delivery of approximately 2,200 new homes and support for delivery of the Western Access Improvements and associated transport improvements, specifically providing phase 1 from Martin Drive to Doxey Road.
- Policy N1 – Design
- Policy N2 – Climate Change
- Policy N4 – The Natural Environment and Green Infrastructure
- Policy N5 – Sites of European, National & Local Nature Conservation Importance
- Policy N8 – Landscape Character
- Policy T1 – Transport
- Proposals Map – Western Access Improvement and Strategic Development Location - Housing

b) The [Staffordshire and Stoke on Trent Joint Waste Local Plan](#) 2010 to 2026 (adopted 22 March 2013):

- Policy 1: Waste as a resource:
 - Policy 1.2 Make better use of waste associated with non-waste related development
 - Policy 1.3 Construction, demolition and excavation waste
 - Policy 1.4 Use of waste for landscaping, screening, engineering purposes

Other material considerations

29. The other material considerations are listed below:
- [The National Planning Policy Framework](#) (the NPPF) (published on 27 March 2012). The following sections are relevant:
 - Section 1: Building a strong, competitive economy
 - Section 2: Ensuring the vitality of town centre
 - Section 4: Transport
 - Section 7: Requiring good design
 - Section 8: Promoting healthy communities
 - Section 10 – Meeting the challenge of climate change, flooding and coastal change
 - Section 11 – Conserving and enhancing the natural environment
 - Section 12 – Conserving and enhancing the historic environment
 - Paragraphs 14 (Presumption in favour of sustainable development); 17 (Core planning principles).
 - [Planning Practice Guidance](#)
 - Ministerial Statement - [Planning for Growth](#) (March 2011),
 - [Stoke-on-Trent and Staffordshire Local Enterprise Partnership Strategic Economic Plan](#)
 - [Stafford Borough Integrated Transport Strategy \(2013-2031\)](#)

Findings of Consultations

Internal

30. The Environmental Advice Team (EAT) has no objections subject to conditions to require the approval of hard and soft landscaping, and a Historic Environment Management Plan (HEMP).
31. Transport Development Control (on behalf of the Highways Authority) has no objections subject to a condition to protect pedestrian and cycle facilities throughout the construction period.
32. The Flood Risk Management Team has no objections subject to a condition to require a detailed surface water drainage scheme for the site based on the provisions set out in the Environmental Statement (Volume 3 – Appendix 6.4), and for a scheme to prevent negative impacts on existing surface water drainage systems.

External

33. The Environment Agency (EA) has no objections provided the Exception Test has been passed for what is 'essential infrastructure' and subject to conditions relating to:
- Flood Risk - development being carried out in accordance with the Flood Risk

Assessment and particularly to require the following mitigation measures:

- the viaduct soffit level is set no lower than 75.39m AOD with a further 600mm freeboard provided over the main channel of the River Sow; and,
 - provision of compensatory flood storage to a volume of no less than 17,800m³.
- Groundwater and Contamination – requirement for a remediation strategy to deal with the risks associated with contamination to include:
 - preliminary risk assessment;
 - site investigation scheme; and,
 - verification plan.
 - Biodiversity – requirement for a scheme to protect, and/or mitigate damage to the River Sow, and for a landscape management plan.
 - Construction – requirement for a Construction Method Statement.
34. Natural England (NE) has no objections and recommended conditions to secure the provision of a Construction Environmental Management Plan which details the pollution prevention measures, highlights the locations of the final working areas/compound within the SSSI and includes details of the diversion of the Broad Meadow drain including the locations of its working area. NE has provided guidance to follow their Standing Advice on protected species and considers that opportunities exist to incorporate features for the benefit of wildlife such as bat roosts or the installation of bird boxes.
35. Public Health England (PHE) has no objections and is reassured that the development would be undertaken following good practice guidelines and in accordance with a Dust Management Plan. PHE recommends actual measured air pollutants data to be collected after completion of the development in order to ratify modelled values.
36. Severn Trent Water has no objections subject to a condition to require drainage plans for the disposal of foul and surface water [note: there would be no foul water as a result of the development; a Surface Water Drainage Scheme has been recommended by the County Council's Flood Risk Management Team – see above].
37. Historic England has no objections and recommends that the application is determined in accordance with national and local planning policy guidance.
38. Network Rail has no objections subject to the following:
- A formal Network Change process being sought for consent to the permanent close of the rail siding adjacent to the St Gobain premises;
 - A new vehicular access being provided for Network Rail to enable vehicular access to the junction of the main line and eastern end of the siding; and,
 - Engineering approval and completion of a Property Agreement prior to any works to Network Rail's Doxey Road bridge.

39. Staffordshire Wildlife Trust has no objections and recommended conditions to secure the provision of the following:
- A Construction Environmental Management Plan (CEMP) to include:
 - A detailed amphibian protection method statement, for all amphibians especially for working in wetlands/ watercourses where they may breed, and including briefing of contractors regarding GCN identification;
 - Pre-commencement check of all working areas and storage areas, where suitable habitat exists, for signs of protected species, at an appropriate time before usage/ clearance begins; and,
 - Pre-commencement harvest mouse and water shrew precautionary working practices/ mitigation strategy.
 - Detailed Landscape Scheme to include:
 - Figures for the areas and values of each habitat type to be lost, retained and created across the whole scheme; and,
 - Detailed specifications for soils, seeding and planting mixes.
 - Landscape and Ecological Management and Monitoring Plan (LEMMP) to include:
 - Bird monitoring plan of affected areas within the SSSI; and,
 - Protected species crossing point monitoring.
40. Western Power has no objections but wish to highlight their requirements in respect of maintenance and safety and general health and safety considerations relating to an overhead power line during construction and operation.
41. Utility companies including CityFibre, Instalcom and GTC have provided details of their assets that could be affected by the development and provided relevant advice and guidance.
42. The Canal and River Trust made no comments.

Views of District/Parish Council

43. Stafford Borough Council (Planning) which incorporates the comments of the Stafford Borough Council Environmental Health Officer (EHO) has no objections subject to the implementation and satisfactory management of the proposed landscaping and planting, mitigation habitat, compensatory flood areas, and recommended conditions related to:
- Hours of construction works (including demolition), and deliveries associated with construction being restricted to 0800 to 1800 (Monday to Friday), 0800 to 1400 (Saturdays), and no working on Sundays;
 - No burning on site;
 - Demolition materials being removed off site for appropriate disposal;
 - Provisions being made for dust suppression including regular road sweeping;
 - Any equipment to be left running outside of the construction works hours to be

inaudible at the boundary of residential properties;

- Provision of noise screening;
- Best practicable means being employed for piling operations with requirement for a method statement and a communication plan for residents and businesses; and,
- Preliminary site investigation and action plan for ground contamination.

In response to consultation relating to the amended additional information and Addendum to the ES, Stafford Borough Council (Planning) indicates a preference for grey coloured block cladding to the viaduct abutments.

44. Stafford Borough Council (Biodiversity Officer) offers no objections.

Publicity and Representations Received

45. Site notice: YES Press notice: YES

Publicity carried out before the application was submitted

46. During December 2009 and January 2010 the County Council carried out an extensive consultation exercise on the options available for improving transport infrastructure in Stafford in light of the likely forecast in traffic growth. Four possible road alignments to the West of Stafford were presented and consultees were invited to express their views about the proposed alternative solutions. The outcome of the consultation process informed the choice of the final nine intervention options that were assessed and the decision regarding which option should be taken forward as the preferred route. In response to comments received, the preferred option was re-aligned in the vicinity of Castletown to take the carriageway away from residential frontages and provide the redundant section of Doxey Road as a service road.
47. In October 2014 local information events took place with the local MP, Castletown and Castlefields Residents' Associations as well as a meeting with representatives of Doxey Parish Council. These meetings were followed by a two day public exhibition on 31 October and 1 November 2014. The event was attended by over 100 residents mainly from the West of Stafford and 71 written comments were received. There was overall support for the scheme, although there were concerns raised mainly related to traffic levels around A34 Foregate Street, along Martin Drive and in Doxey, and some concerns regarding walking and cycling provision. The applicant has continued to work with local residents about the Scheme during the detailed design stage.

Publicity carried out on the application

48. The planning application was advertised by site notices posted along and adjacent to the proposed new road, and was advertised in the local press. 1,487 neighbour notification letters were sent out to properties in the area of the proposed new access road and properties in the area of the flood compensation works. Letters were sent firstly to notify about the planning application (22 June 2015), secondly to update neighbours likely to be affected by the changes described in the additional information and Addendum to the Environmental Statement that was submitted (19 August 2015), and thirdly to notify those neighbours likely to be affected by the amendments made to the application (02 October 2015). Further site notices were posted around the area of the site and further notices were placed in the local press

to publicise the additional information and Addendum to the Environmental Statement, and the further amendments.

49. A total of 21 representations have been received including representation received from the Castletown Residents Association.
50. In response to the publicity that was carried out following receipt of the further information and amendments to the application, two further representations have been received. One of the further representations (on behalf of the Ramblers Association) reiterates previous comments with regard to the view that a crossing point should be provided for pedestrians and cyclists at Doxey Road for safe passage from new housing to be built at Castlefields. This particular matter is addressed later in the report at paragraph 70 (e).
51. The representations raised a number of concerns that are summarised as follows:
 - *Waste of money* – benefits do not outweigh costs and would not alleviate congestion problems;
 - *Parking* – management of parking and potential traffic calming along Martin Drive and Kingsway along with potential to cause problems elsewhere on Castlefields Estate during and post construction; parking on Grey Friars and its use as a rat-run to access the new road; replacement for lost lorry parking area in the town and potential impacts from indiscriminate parking of HGVs;
 - *Environmental impacts* – effects on biodiversity and wildlife on the Doxey Marshes; traffic noise; light pollution;
 - *Cycleway provisions* – impacts on cyclists during construction and a lack of provision for cyclists in the design;
 - *Increased traffic* – potential for more congestion, queues and delays;
 - *Flood compensation works (Creswell)* – impact upon permitted housing development; impacts on the water-table and potential for flooding to other areas including residential properties; impacts from engineering works from noise, dust, odours (methane), and pollution;
 - *Junction arrangement (Timberfield Road/Doxey Road)* – safety concerns and suggest consideration be given to a roundabout or a traffic light controlled junction.
 - *St Gobain* – loss of an important building of merit;
 - *Construction* – impacts upon houses in Castletown from piling to create viaduct;

Climate change – more emphasis should be placed on walking, cycling and bus use and away from catering for car use; and,

 - *Equestrian Access* – lack of provision.

The Applicant's Case

52. The applicant contends that the objective of the Stafford Western Access Route is to:
- Provide high quality transport infrastructure required to deliver development in Stafford;
 - Reduce congestion on routes into and around the town centre which act as a constraint on growth proposals; and,
 - Facilitate improved access by sustainable modes between housing growth areas and the town centre.
53. The strategic case for the access road scheme is based upon the need to accommodate new development in Stafford as proposed in the Plan for Stafford and supported in the Stoke on Trent and Staffordshire Local Enterprise Partnership's Strategic Economic Plan. In terms of monetised benefits, the applicant contends that the preferred solution for the publicly funded element of the scheme would provide:
- Substantial benefits amounting to £94.2 million over a 60 year appraisal period mainly due to travel time savings;
 - High value for money with a Benefit to Cost Ratio of 2.67;
 - A Benefit to Cost Ratio of 3.61 with the inclusion of journey time reliability and inter-peak benefits.
54. The Stafford Western Access Improvements are seen by the applicant as a key element of the sustainable transport solution that is required to deliver growth in Stafford. The applicant considers that drivers would benefit from travel time savings and an improved journey quality; pedestrians and cyclists would benefit from the new facilities provided along the route; and bus users would benefit from more reliable existing services and new services that are likely to use the new road.

Observations

55. This is an application to construct the new Stafford Western Access Road which includes a low viaduct and bridge, landscaping works and the demolition of existing industrial buildings on land between A34 Browning Street/Foregate Street and Martin Drive, Castlefields, Stafford; highway works along and adjacent to Doxey Road, Greyfriars Place and Browning Street/Foregate Street; a flood compensation scheme within Doxey and Tillington Marshes SSSI at Creswell; and, new pedestrian and cycle crossing facilities on Martin Drive and Kingsway, Castlefields, Stafford.
56. Having given careful consideration to the application, the supporting and environmental information (including the additional information subsequently received), the relevant development plan policies and other material considerations, the consultation responses and the representations, all referred to above, the key issues are considered to be:
- Planning policy considerations
 - Environment and amenity considerations

- Other matters raised in representations
- Need for a Memorandum of Understanding

Planning Policy Considerations

57. The National Planning Policy Framework (NPPF) promotes sustainable development as a key theme (Section 1). The NPPF (paragraph (paragraph 29) supports sustainable transport and recognizes that different policies and measures will be required to maximize sustainable transport solutions which will vary from urban to rural areas. NPPF (paragraph 31), supports working between neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development, including amongst others, for major generators of travel demand in their areas.
58. The Plan for Stafford (Policy Stafford 1 – Stafford Town), aims to increase the range and quality of services and facilities in Stafford. The policy relies on the delivery of the Stafford Borough Integrated Transport Strategy 2013 which includes packages of access improvements for the West, North and East of Stafford including the Stafford Western Access Road. This policy specifically supports the proposed Western Access Road.

Committed Development – Policy Stafford 1 (Stafford Town)

59. Policy Stafford 1 in its commitment for housing makes provision to:

Continue to meet the housing requirements for Stafford Town by providing a total of 7,000 new market and affordable homes, as well as additional provision for Ministry of Defence personnel:

The policy promotes the provision of a range and type of housing in a range of development locations over the Plan period to 2031. This would include the housing provision identified on the Policies Map to the West of Stafford linked to delivery of the Western Access Improvements from Martin Drive to Doxey Road. The policy also recognises these strategic development locations, adjacent to Stafford's urban area, would be accessible by public transport and provide facilities to encourage walking and cycling.

Committed Development – Policy Stafford 3 (West of Stafford)

60. Policy Stafford 3 of the adopted Plan for Stafford promotes the delivery of well-designed mixed use development to the west of Stafford by 2031. This would include 2,200 new homes with local retail facilities, public open space, social and physical infrastructure, a primary school, and a community building with provision for a library service and health facilities.
61. Policy Stafford 3 with respect to transport promotes an access, transport and travel plan strategy for the development and supports the delivery of the Western Access Improvements and associated transport improvements, particularly in providing phase 1 from Martin Drive to Doxey Road.
62. Policy Stafford 3 in respect to infrastructure, promotes a link from the Martin Drive spine road to Doxey Road with potential upgrade to railway bridge required for the

development west of Stafford as part of the Stafford Western Access Improvements, together with new or enhanced bus routes, cycling and walking links to existing routes to the town centre and other key destinations, and the creation of facilities. Developer contributions would be required to provide the strategic infrastructure required.

63. The applicant has provided a statement in the application that they have worked closely in developing the proposals with stakeholders including Stafford Borough Council. Stafford Borough Council has endorsed the new access road in a letter dated 5 August 2014 which accompanies the planning application. The Borough Council consider that the new access road would help to promote the development of a key site in the Plan for Stafford for housing development to the west of Stafford. Stafford Borough Council in its response to consultation states that the principle of the application is supported by Policy Stafford 1 (Stafford Town) and Policy Stafford 3 (West of Stafford), contained in the Plan for Stafford.
64. *Conclusion:* It is reasonable to conclude that the proposals accord with the relevant development plan policies in the adopted Plan for Stafford (Policy Stafford 1 and Policy Stafford 3) and that the provision of the Stafford Western Access Road would ensure that the objectives of the Plan for Stafford can be achieved. The proposals also accord with the objectives for sustainable transport in the National Planning Policy Framework.

Environmental and Amenity Considerations

65. In assessing the environmental information provided in the Environmental Statement and subsequently provided, it is necessary to determine whether or not the development would give rise to any unacceptable adverse impacts individually or in combination on the environment and amenity that would outweigh any material planning benefits of the proposals. The following sections consider the submitted environmental information and further information subsequently received, having regard to the relevant development plan policies, the other material considerations, the consultee comments and the representations received.

Traffic Implications

66. The NPPF (section 4) promotes sustainable transport and solutions which support the reduction in greenhouse gas emissions and congestion. NPPF (paragraph 30) encourages solutions which support a reduction in greenhouse gas emissions and congestion. NPPF (paragraph 32) states that all developments that generate significant amounts of traffic movements should be supported by a Transport Assessment and decisions should take account of whether:
- *‘the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure;*
 - *safe and suitable access to the site can be achieved for all people; and,*
 - *improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. Development should*

only be prevented or refused on transport grounds where the residual cumulative impacts of development are 'severe'.

67. The Plan for Stafford (Policy T1), seeks to ensure that a sustainable transport system will be achieved. This is sought to be achieved in part by:

'seeking to reduce the impact of traffic from new development on the road networks by ensuring that the generation of traffic is minimised through sustainable transport measures. Ensuring that all developments that generate significant traffic flows, including commercial traffic must be located in close proximity to the primary road network, do not have a negative impact on the network or at junctions, air quality, and nearby communities, and should have adequate capacity to accommodate the development or can be improved or mitigated as part of the development'

68. An assessment of traffic impacts has been carried out in the ES. The assessment considers the traffic impact of the proposals on the local highway network with respect to traffic forecast comparing the 'do-minimum' and 'do-something' forecasts for 2018 and 2033 future year scenarios. The proposed new access road is predicted to improve overall performance of the network, reducing overcapacity queued time by 42% and 39% in the 2033 AM and PM peaks respectively. It also predicts that junction performance would be improved around the town centre enabling the traffic that remains using the town centre to benefit, and that journey times would be reduced. The Non-Technical Summary accompanying the application explains that the new access road scheme would provide the principal benefit of reducing driver stress on the wider local highway network.
69. A number of the representations raise concerns about the increase in traffic, the potential for delays and increased congestion, and potential parking problems.
70. The applicant has addressed these concerns and contends that one of the main benefits of the scheme is to relieve traffic congestion. The applicant further contends that the delivery of the Western Access Road is supported through Policy Stafford 1 of the Plan for Stafford which relies on the delivery of the Stafford Borough Integrated Transport Strategy which includes a package of access improvements. Specific matters raised in representations have been addressed as follows:
- a) *Increased Traffic:* the applicant contends that one of the main benefits of the proposals is to relieve traffic congestion on Chell Road and Gaol Square island and that recent improvements at Chell Road to extend and merge lanes have been installed to increase capacity including the period during construction.
 - b) *Junction Improvements:* the applicant contends that forecast flows have informed the design process and all new junctions demonstrate that they would operate acceptably in 2033.
 - c) *Parking – Martin Drive:* the applicant refers to the pre-application discussions that took place with the Castlefields Residents Association and public meetings that were held. Informal parking along Martin Drive is recognized along with the potential displacement of this parking into other areas of Castlefields. The County Council does not have powers to prevent non-

residents from parking within the estate without implementing measures that may have an adverse impact on residents; such schemes include a residents parking scheme, parking restrictions (yellow lines), or signage with appropriate restrictions. The applicant affirms that the proposed double yellow line along Martin Drive would be installed prior to construction works and the applicant proposes working with the Residents Association and will monitor the situation; and, if necessary, implement the appropriate form of restrictions deemed to be required. The applicant considers that such measures are likely to evolve over time and would need to be regularly assessed prior to implementing a scheme.

- d) *Doxey Rail Bridge – cycling facilities*: the applicant contends that the proposed bridge treatment for cyclists and pedestrians meets design standards and pre-application discussions took place with Sustrans and the Ramblers Association who both indicated that proposed treatment over the bridge was acceptable.
- e) *Doxey Road - lack of crossing*: the applicant contends that the forecast traffic flows do not support the provision of a controlled crossing in this location though this would be kept under review as development proposals emerge [see Memorandum of Understanding].
- f) *Grey Friars Place – use as a rat-run*: the applicant would monitor conditions post implementation of the new road and if changes to the traffic management regime are necessary, solutions would be developed in full consultation with local stakeholders [see Memorandum of Understanding].

71. The matters raised in representations have not been raised in the responses received from consultees. The Transport Development Control Team offers no objections to the proposals subject to protection being afforded to pedestrian and cycle facilities throughout the construction period.

72. *Conclusion*: Having regard to the traffic assessment, the undertakings to be secured by a Memorandum of Understanding, the recommended conditions, the planning policy considerations and the comments received, it is reasonable to conclude that the proposals would not give rise to any unacceptable adverse traffic impacts or safety implications for users of the highway network and pedestrians.

Landscape and Visual Impact

73. The application areas lie partly within the urban built up area of Stafford and new section of road would cut the Doxey and Tillington Marshes, Site of Special Scientific Interest (SSSI), typified by marshland and scrub that is prone to flood. The flood compensation scheme also lies within the Doxey and Tillington Marshes.

74. The Plan for Stafford (Policy N1 – Design) and (Policy N8 – Landscape Character), promote good design principles and for proposals to be informed by, and be sympathetic to, landscape character and quality, demonstrated through local site specific assessments in the context of the Staffordshire Landscape Character Assessment together with Historic Landscape Characterisation Assessment and the Historic Environment Character Assessment. These policies are consistent with the NPPF (Section 7 - requiring good design, Section 11 - conserving and enhancing the

natural environment and Section 12 - conserving and enhancing the historic environment).

75. A small number of the representations raise concerns with respect to visual impacts on the landscape in respect to views of the raised viaduct across the marshes. Concern is also raised in one representation about the loss of a historic landscape feature, namely the buildings on the St Gobain site. Stafford Borough Council has indicated a preference for grey coloured blockwork in the construction of the viaduct.
76. The proposed construction works would be carried out over a relatively short period (commencing in April 2016, subject to land acquisition and be completed by about September 2018, subject to funds from housing developer contributions being made available to pay for Section C and subject to land acquisition). The ES concludes that the visual impacts would create a slight adverse impact in the first year of the scheme at four locations with remaining viewpoints experiencing a neutral or slight beneficial effect. With the use of proposed landscaping and mitigation, the applicant contends that after 15 years of operation, the impacts of the proposals would be further reduced. The overall conclusion is that the proposals would not result in significant harm to landscape or visual amenity and that there would be some beneficial effects on landscape and townscape character as a result of redevelopment of areas of derelict land and introduction of structured planting.
77. With respect to the loss of the St Gobain site, the applicant has addressed the comments raised in the representation. The applicant contends that the cultural heritage chapter of the ES has been undertaken in accordance with recognised guidance for assessing impacts resulting from road schemes. The St Gobain site as a modernist building was assessed within the baseline report. As a non-designated asset of historic interest, the value of the building is considered to be low. The building has not been identified for listing as it does not conform to the high level of architectural and historic interest. In addition, the applicant affirms that the building has not been identified by the local authority for special treatment (i.e. local listing), and its importance was not raised during consultation with the Borough Council's conservation officer.
78. No objections have been received from consultees though a preference has been indicated by Stafford Borough Council for use of grey coloured blockwork in the construction of the viaduct instead of buff coloured blockwork. The colour of blockwork is a subjective matter and the Environmental Advice Team has not objected to the proposed buff coloured blockwork. It is not therefore considered relevant to recommend that blockwork should be a grey colour. Conditions have been recommended where appropriate to require details of a landscaping scheme, a Landscaping and Environmental Management Plan (LEMP) and a Historic Environment Management Plan (HEMP).
79. *Conclusion:* Having regard to the landscape and visual assessment in the ES, the planning policy considerations, the comments received, the duration of the construction phase and the proposed landscape mitigation measures, it is reasonable to conclude that the proposals would not give rise to any unacceptable adverse landscape and visual impacts, or adverse impacts on historic landscape.

Ecology and Nature Conservation

80. The application was accompanied by an ecology and nature conservation assessment that considers the potential effects of the proposals on biodiversity and the Doxey and Tillington Marshes SSSI. A small area of existing SSSI would be permanently lost to accommodate the proposed new access road. Most of this is however currently classified as destroyed SSSI and is occupied by a car park. The assessment concluded that following mitigation, the proposals to the west of Stafford would result in minor adverse (not significant) impacts on bats, moderate beneficial impacts on Doxey and Tillington Marshes SSSI, minor beneficial impacts on protected species and semi-improved grassland and neutral impacts on otters, and aquatic habitats. Impacts on breeding and wintering birds are thought to be potentially minor adverse. Due to uncertainty, monitoring is proposed.
81. The Non-Technical Summary accompanying the application explains that the proposals provide the opportunity to restore destroyed parts of the SSSI and adjacent land, to habitats that complement the Doxey and Tillington Marshes SSSI. The proposed Flood Compensation Area is also an opportunity to provide habitat improvements that would benefit the SSSI.
82. The NPPF (Section 11 – conserving and enhancing the natural environment) requires that the planning system should contribute to and enhance the natural and local environment by:
- ‘minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government’s commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures’.* (ref. The NPPF (section 11 - paragraph 109))
83. The NPPF (paragraph 118) states that when determining planning applications, local planning authorities should aim to conserve and enhance biodiversity by applying the following principles:
- ‘if significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then permission should be refused;*
84. The Plan for Stafford (Policy N4) seeks to protect the natural environment and enhance and improve it by implementation of the Staffordshire Biodiversity Action Plan, the Stafford Borough Green Infrastructure Strategy and guidance including 'Biodiversity by Design' or any other successor documents to increase and enhance biodiversity, in terms of habitats and species as well as geological conservation or geodiversity through appropriate management for a network of Designated Sites (international, national, regional and local), Biodiversity Action Plan habitats and species populations and Wildlife Corridors and Ecological Networks.
85. Government Circular 06/2005 – ‘Biodiversity and Geological Conservation’ places a responsibility on local planning authorities to further the conservation of habitats and species of principal importance where a planning proposal may affect them.

86. A small number of the representations raise concern about the impacts upon biodiversity and upon the SSSI.
87. The applicant has addressed the concerns raised in representations and contends that all impacts of the proposals have been fully assessed in the preparation of the ES and that there has been full consultation with statutory consultees and stakeholders to agree a scheme of mitigation.
88. No objections have been raised by consultees including the Environment Agency, Natural England, Staffordshire Wildlife and the Stafford Borough Council (Biodiversity Officer) on conservation or biodiversity grounds and appropriate conditions are recommended to require details for the survey and protection of species, appropriate mitigation and monitoring relating to the flood compensation area at Creswell and the River Sow.
89. *Conclusion:* Having regard to the ecology and nature conservation assessment in the ES and the information subsequently received, the policy considerations, the comments received and subject to the conditions recommended below, it is reasonable to conclude that the development would not give rise to any unacceptable adverse impacts on ecology and nature conservation.

Flood Risk

90. The ES provides an assessment of the potential effects of the construction and operation of the new access road on surface water, groundwater and flood risk. A drainage strategy is also provided. The Flood Risk Assessment that accompanies the application concludes as follows:

Flood risks to the development

- There is no risk of flooding to the proposed route and structure;
- The finished road level of the structure has been designed to be set at the 1 in 100 year + climate change flood level, with an additional 600 mm of freeboard, giving a finished roadway level of 75.99 m AOD. The flood risk to the structure is therefore considered to be low;
- The risk of surface water flooding and overland flow to the majority of the route is low, assuming that an appropriately designed surface water drainage system is provided to ensure safe removal of surface water from the highway area;
- Due to the raised elevation of the proposed structure the flood risk from existing sewers or drains is therefore considered to be low;
- From the available data, the risk of groundwater flooding is considered to be low, since the route is on a raised viaduct; and,
- The route lies within areas mapped to be at risk of flooding from reservoirs, but reservoir failure is highly unlikely, and combined with the elevated nature of the structure the flood risk from artificial waterbodies is considered to be low.

Flood risks from the development

- The effect of the viaduct and embankment on flood risk has been assessed through hydraulic modelling. The modelling was undertaken in order to fully understand the impacts of the structure on flood levels and extents along with the impacts on receptors.
 - In order to reduce the predicted increase in flood depths and extents upstream, a proposed compensatory storage design was modelled. The model showed that with compensatory storage, the predicted increases in flood depth upstream were reduced when compared to the 'no storage' option. With the proposed compensatory storage in place, the maximum increase in flood levels upstream (compared to the baseline) would be 0.04 m for the 1 in 100 year flood event, with an allowance for climate change.
 - By including compensatory storage within the proposed route design, there is a small increase in predicted flood level upstream of the structure, but this is not considered to be significant as no additional properties or infrastructure are affected. Downstream of the structure, flood risk is reduced and eleven properties are removed from the 1 in 100 year plus climate change flood extent.
91. The Flood Risk Assessment contends that the proposed works are essential infrastructure in the functional floodplain (Zone 3b) and acknowledges that an exception test is required. A range of mitigation measures are proposed in the ES for both the construction and operational phases which include good construction management practices undertaken in a controlled manner aimed to ensure no adverse effects on the water resources environment which would be controlled through the Construction Environmental Management Plan (CEMP). This would include site specific methodologies for high risk activities such as reproofing the Doxey Drain, and placing of excavated material within the Creswell Flash, and the realignment of the Broad Meadow Drain. Sustainable Drainage Systems would be used where practicable.
92. The ES concludes that flood modelling shows that the proposed scheme with compensatory flood storage would result in a net reduction of properties at risk from flooding and that the construction and operation of the road would not result in any adverse impacts on the water resources of the local area. The Addendum to the ES concludes that no further mitigation is required.
93. The potential for flooding elsewhere is questioned in one of the representations received but no objections have been received from the Environment Agency, who has commented that hydraulic monitoring has been carried out in order to demonstrate that works would not increase flooding to neighbouring and downstream locations; the model has been reviewed and is considered to be acceptable. The Environment Agency confirmed that proposals are 'essential infrastructure', that the Exception Test should be passed and recommended that the development be carried out in accordance with the Flood Risk Assessment along with specific mitigation measures to provide distances for the viaduct over the River Sow and volume provision for compensatory flood storage. The Flood Risk Management Team has also recommended conditions for a detailed Surface Water Drainage Scheme for the site based on the provisions set out in the Environmental

Statement (Volume 3 – Appendix 6.4), and for a scheme to prevent negative impacts on existing surface water drainage systems.

The *Sequential and Exception Tests*

94. The NPPF (paragraph 100) advises that inappropriate development in areas at risk from flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere. The NPPF (paragraph 103), advises that when determining planning applications, local planning authorities should ensure flood risk is not increased elsewhere and only consider development appropriate in areas at risk of flooding where, informed by a site-specific flood risk assessment following the Sequential Test, and if required the Exception Test, it can be demonstrated that:

‘within the site, the most vulnerable development is located in areas of lowest flood risk unless there are overriding reasons to prefer a different location; and

development is appropriately flood resilient and resistant, including safe access and escape routes where required, and that any residual risk can be safely managed, including by emergency planning; and it gives priority to the use of sustainable drainage systems.’

95. The SWAR lies partly within Flood Zone 3 but the adopted Plan for Stafford Borough allocated the route to serve new development to the west of Stafford, and alternative alignments were considered but none were available in Flood Zones 1 and 2 to serve the allocated development to the west of Stafford. The Plan for Stafford Borough also aims to ensure that all new development incorporates Sustainable Drainage Systems (SuDS) and new development takes place in areas where environmental risks, particularly flooding, can be properly managed. Having regard to the ES, the FRA, Plan for Stafford Borough and the conditions recommended below, it is therefore reasonable to conclude that the SWAR passes the sequential test.
96. The Environment Agency has confirmed that the SWAR is ‘essential infrastructure’, partly in Flood Zone 3b, and that it is necessary to pass the exception. The NPPF (paragraph 102) states that in order to pass the exception test it must be demonstrated that:

‘the development provides wider sustainability benefits to the community that outweigh flood risk, informed by a strategic flood risk assessment where one has been prepared’.

‘a site specific flood risk assessment must demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere and, where possible, will reduce flood risk overall.’

97. A [Strategic Flood Risk Assessment](#) (SFRA) has been prepared for Stafford and a detailed Flood Risk Assessment accompanied the application. The ES demonstrates that the SWAR would provide sustainable benefits to the wider community by providing essential transport infrastructure required to serve new development to the west of Stafford allocated in the Plan for Stafford Borough and

that the development would be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere and, would reduce flood risk overall. Having regard to the ES, the SFRA, the FRA, Plan for Stafford Borough and the conditions recommended below, it is therefore reasonable to conclude that the SWAR passes the exception test.

98. *Conclusion:* Having regard to the Environmental Statement, the Flood Risk Assessment, the planning policy considerations, the sequential and exception tests, the comments received, and subject to the conditions recommended below, it is reasonable to conclude that the proposals would not give rise to an unacceptable adverse impact in terms of the risk of flooding.

Noise and Vibration

99. NPPF (paragraph 123) advises that planning policies and decisions should aim to ensure that noise from development does not give rise to significant adverse impacts on health and quality of life and noise should be mitigated when necessary through the use of conditions.
100. The Plan for Stafford (Policy N1 – Design) requires that the noise implications of development on the amenity of adjacent residential areas are taken into account.
101. A number of the representations raise concerns about the piling operations and the resulting increase in traffic using the new road.
102. The application is accompanied by a noise and vibration assessment that considers the impacts from noise both during the construction phase and upon commissioning of the road. The ES considers that construction is likely to cause a potential significant effect at Doxey Road, Spruce Way, Rosewood Gardens and Barker Close when construction is within 100m of noise sensitive receptors and demolition works at the St Gobain site is likely to cause potential significant impacts within 100m at Mahogany Drive and Spruce Way. Potential significant impacts from piling are predicted at Doxey Road. The nearest construction works are at 10m from properties on Doxey Road and could result in complaints.
103. Temporary screening (noise barriers) are recommended to be used around the noisiest works in close proximity to receptors, however residual construction noise levels would still be above the thresholds for potentially significant effects for short periods. Residual effects during construction are proposed to be reduced through the use of best practice working methods. After opening of the road, the majority of residential receptors within the study area are predicted to experience negligible noise increases in both the opening and design years.
104. The applicant has addressed the concerns raised in the representations and contends that where impacts have been identified, appropriate mitigation has been recommended in the ES and that the specific details for noise and vibration mitigation related to construction works would form a part of a Construction Environmental Management Plan (CEMP) as required through conditions attached to any permission. The applicant advises that consultation is being carried out with specialist contractors regarding appropriate piling techniques.

105. The EHO has assessed the environmental noise information and offers no objections. Although comments are not restricted solely to noise considerations, the EHO has recommended that construction working hours be restricted to 08:00 – 18:00 (Monday to Friday), 08:00 – 14:00 on Saturdays. Having regard to the location of the works this limitation is considered to be reasonable for a major construction project in proximity to sensitive receptors, and the application has indicated that working hours for weekdays are inclusive of half hour start up and close down periods and therefore within the times recommended by the EHO. With regard to the hours recommended by the EHO for Saturday working, the start time would be consistent with that proposed allowing for half hour start up, with the finishing time being one hour later than that proposed. In addressing the comments from the EHO, the applicant has agreed to limit noisy activities such as demolition and piling works so that they do not commence before 08:00 (weekdays) and 08:30 (Saturdays). It is recommended that this restriction be secured by a condition.
106. *Conclusion:* Having regard to the noise assessment in the ES, the planning policy considerations, comments received and subject to the conditions recommended below, it is reasonable to conclude that the development would not give rise to unacceptable adverse impacts from noise and vibration.

Pollution – Air Quality and Health

107. The NPPF advises that decisions should ensure that new development is appropriate for its location and the effects (including cumulative impacts) of pollution on health, the natural environment or general amenity and the potential sensitivity of the area to adverse effects of pollution should be taken into account. NPPF (paragraph 109) advises that the planning system should contribute to and enhance the natural and local environment by:
- ‘preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability...’*
108. The NPPF (paragraph 122) addresses the different roles of a planning authority and a pollution control authority and states:
- ‘... local planning authorities should focus on whether the development itself is an acceptable use of the land, and the impact of the use, rather than the control of processes or emissions themselves where these are subject to approval under pollution control regimes. Local planning authorities should assume that these regimes will operate effectively. Equally, where a planning decision has been made on a particular development, the planning issues should not be revisited through the permitting regimes operated by pollution control authorities.’*
109. The Plan for Stafford (Policy N1) requires that design and layout takes into account noise and light implications, together with the amenity of adjacent residential areas or operations of existing activities.
110. The application is accompanied by an Air Quality Assessment that assesses the impacts for fugitive emissions for particulate matter (PM2.5 and PM10) and NO2. The assessment considered 2000 human receptors (residential properties and dust

sensitive commercial properties within 350m of the scheme, the nearest properties being on Doxey Road, and along Spruce Way and Rosewood Gardens. The Doxey and Tillington Marshes SSSI is also within 350m of the scheme. Assessment concludes that construction would generate fugitive emissions (PM10 - dust) classed as 'medium' in terms of dust emission magnitude for demolition of St Gobain and construction activities are likewise classified as 'medium'. The ES concludes that with appropriate mitigation measures in place, the works should not have a significant effect on human receptors and the Doxey and Tillington Marshes.

111. A study and modelling of the road traffic emissions in the ES was carried out at locations within 200m of roads likely to be affected by changes in traffic as a result of the scheme; receptors were also considered within the SSSI. The proposed scheme is within an area where air quality is relatively good. The operational phase of the road is expected to have a negligible impact at the majority of human health receptors; two human health receptors would experience a slight beneficial impact. The ES concludes that pollutant concentrations would be below air quality criteria and that the scheme would not have a significant effect on air quality. It also concludes that it is not expected that a significant adverse effect would result in respect of the SSSI.
112. Two of the representations raise concerns about the increased levels of pollution as a direct result of increased levels of traffic and from release of dust and methane gas that could be produced in carrying out flood compensation works.
113. A number of properties that would be sensitive to dust from the construction operations have been identified within the ES. The applicant has addressed the concerns as follows:
 - Dust – the impacts of dust during construction are assessed within the ES and mitigation measures are proposed to be carried out through good practice and as part of a Construction Environmental Management Plan.
 - Methane gas – advice has been sought from Stafford Borough Council's EHO who has advised that issues relating to the release of methane is not expected as it would readily disperse to air. The applicant further contends that the majority of spoil generated is expected to be of a sandy nature and that methane is not an issue with this material.
 - Traffic impacts - air pollutant data is to be collected after completion of the development in order to ratify modelled values.
114. No objections have been received from consultees and Public Health England and Stafford Borough Council (Environmental Health Officer) support provisions to control dust amongst others (vibration and noise) in a Construction Environmental Management Plan.
115. *Conclusion:* Having regard to the air quality assessment in the ES, the planning policy considerations, the comments received, and subject to the imposition of conditions, it is reasonable to conclude that the proposals would not give rise to any unacceptable adverse impacts in terms of air quality.

116. *Overall Conclusions: environmental and amenity considerations:* Having regard to the submitted environmental information, the development plan policies, government guidance, and the comments and representations received referred to above, it is reasonable to conclude, subject to the imposition of conditions, that the proposals would not give rise to any unacceptable adverse impacts on the environment and amenity individually or in combination that would outweigh any material planning benefits of the proposals.

Other matters raised in representations

Comments from Western Power Distribution (WPD)

117. Due to the presence of a 132 kv overhead power line, WPD have drawn attention to their particular requirements.
118. The applicant responded to the comments from WPD by confirming that they had been in detailed discussions with them for the last 18 months and have given an undertaking (as part of the MoU) to endeavour to agree with them (and the other utility providers) their requirements during construction of the SWAR and maintenance of their assets thereafter. It is understood that discussions with WPD are ongoing and WPD have confirmed that they are committed to working with the design team on the delivery of the SWAR.

Relocation of Rugby Club

119. The relocation of the rugby club does not form a part of the planning application and is a separate matter that is currently the subject of a planning application to Stafford Borough Council.

Scheme not strategically required

120. The applicant has addressed this concern and attests that the SWAR provides a sustainable transport solution to deliver the level of growth required for Stafford. Through the Local Plan process transport advice was issued that allowed Stafford Borough Council to identify the most sustainable locations for development and to maximise sustainable transport opportunities. The applicant contends that the scheme is part of a transport strategy that includes interventions to widen opportunities to travel by sustainable modes.

Permitted housing development (Creswell)

121. Following the submission of the planning application, the applicant was made aware that the area proposed for the flood compensation works at Creswell included an area that is subject to a planning permission for housing at Wooton Drive, Creswell. Amendments were made to reduce the application boundary to avoid conflict with consented development and this was included in the submitted further/additional information and Addendum to the ES received on 17 August 2015.

Climate Change

122. The applicant contends that the SWAR is part of a wider transport strategy that includes interventions to widen opportunities to travel by sustainable modes. A wholly sustainable strategy could not satisfactorily deliver the level of growth required for Stafford Town.

Effects on water table

123. The Environment Agency is the regulatory authority for ground water and has been involved in the design of the flood compensation works. The Environment Agency has no objections and has recommended appropriate conditions.

Equestrian Access

124. The applicant has responded and has advised that the Isabel Trail is a permissive route which does not exclude horse riders. To provide appropriate signage land owners permission is required. The applicant has written to Stafford Borough Council as land owner to ask if they would provide appropriate signage.

Lorry Park

125. The applicant contends that the replacement of the lorry park is the responsibility of Stafford Borough Council as land owner. This is also a matter that would be mitigated by the delivery of the wider package of measures proposed in the Stafford Borough Integrated Transport Strategy.

Cycleway provisions

126. The applicant attests that proposals include provision of a toucan crossing across Martin Drive and Kingsway and that the western footway of Martin Drive is proposed to be widened to incorporate a shared pedestrian/cyclist facility.

Need for a 'Memorandum of Understanding'

127. The applicant has offered to carry out a number of undertakings within a Planning Obligations Statement accompanying the planning application; the proposed undertakings have since been reduced as a result of the changes to the application boundary which would enable control of some of the matters by planning conditions. It would be normal to secure such an undertaking as part of a Section 106 Legal Agreement (Section 106). In this case however the County Council is the applicant and cannot enter into a legally enforceable agreement with itself. As an alternative, it is appropriate to recommend that the County Council sign a Memorandum of Understanding (MoU). MoUs have been used before by the County Council to provide a transparent commitment to fulfil certain undertakings.

128. Before a Section 106 (or MoU in this case) can be taken into account as a material consideration in deciding whether or not to grant planning permission, it is first necessary to determine whether or not the undertaking(s) in it meet the tests set out in the [NPPF paragraph 204](#). The 3 tests are that the undertaking should be:

1. necessary to make the development acceptable in planning terms;
2. directly related to the development; and,
3. fairly and reasonably related in scale and kind to the development.

129. In this case it is reasonable to conclude that the proposed undertaking(s) would meet the tests referred to above for the reasons discussed below:

- a) The give responsibility for the management of the disturbed and newly created habitats within the SSSI to Staffordshire Wildlife Trust:

- As the Staffordshire Wildlife Trust already manage the SSSI they are best placed to manage the disturbed and newly created habitats in the SSSI;
- The disturbed and newly created habitats would directly arise from the release of land previously occupied by a car park and as a result the flood compensation scheme; and,
- An approved Landscape and Ecological Management and Monitoring Plan (LEMMP) (see below) would ensure that the management was fairly and reasonably related in scale and kind to the development.

b) Traffic monitoring and air quality data evaluation

- Traffic monitoring proposed by the applicant and the evaluation of air quality monitoring data recommended by Public Health England to validate modelled values in the ES would assist in the County Council's on going management of traffic in the Stafford area following the opening of the SWAR;
- Traffic monitoring proposed by the applicant and the evaluation of air quality monitoring data recommended by Public Health England is directly related to the development as it would monitor and evaluate traffic using the new road, local roads and the effects on local communities such as Castlefields and Castletown; and,
- Traffic monitoring and the evaluation of air quality monitoring data recommended by Public Health England would be directly related to the development and fairly and reasonably related in scale and kind to the development.

c) Network Rail Access

- Provision of access to the junction of the main line would allow suitable access to Network Rail land (subject to land availability);
- Provision for access is directly related to the development as current access arrangements would be interrupted; and,
- Provision for access is fairly and reasonably related in scale and kind to the development.

d) Agreement with Utility Providers

- Agreement with utility providers would assist the County Council in ensuring that construction is carried out safely in proximity to electricity lines and other apparatus;
- Agreement with utility providers would be directly related to the development; and,
- Agreement with utility providers would be reasonably related in scale and

kind to the development.

e) Landscape and Ecological Management and Monitoring Plan (LEMMP)

- A LEMMP would assist the County Council in monitoring the effects on the disturbed and newly created landscaped areas, habitats within the SSSI, the River Sow, protected species and wintering birds within those areas, and monitoring the SWAR protected species crossing point; and,
- A LEMMP would first be approved so that it is directly related to the development and fairly and reasonably related in scale and kind to the development.

Overall Conclusion

130. Overall, as an exercise of judgement, taking the relevant development plan policies as a whole and having given consideration to the application, the supporting and environmental information (including the additional information subsequently received), the consultation responses, the representations and the other material considerations, all referred to above, it is reasonable to conclude that the proposals are acceptable and should be permitted, subject to the applicant entering into a 'Memorandum of Understanding' to secure undertakings referred to above and the planning conditions recommended below.

**ACTING DIRECTOR OF PLACE AND WITH EFFECT FROM 1 NOVEMBER 2015,
ACTING DIRECTOR FOR ECONOMY, INFRASTRUCTURE AND SKILLS'
RECOMMENDATION**

For the purposes of Regulation 3 of the Town and Country Planning General Regulations 1992, **PERMIT** the construction of the new Stafford Western Access Road including: a low viaduct and bridge, landscaping works and the demolition of existing industrial buildings on land between A34 Browning Street/Foregate Street and Martin Drive, Castlefields, Stafford; highway works along and adjacent to Doxey Road, Greyfriars Place and Browning Street/Foregate Street; a flood compensation scheme within Doxey and Tillington Marshes SSSI at Creswell; and, new pedestrian and cycle crossing facilities on Martin Drive and Kingsway, Castlefields, Stafford, subject to a Memorandum of Understanding and planning conditions (the heads of terms of which are listed below).

The Memorandum of Understanding heads of terms:

- a) To give responsibility for the management of the disturbed and newly created habitats within the SSSI to Staffordshire Wildlife Trust who already manage the SSSI.
- b) To carry out new signalised pedestrian crossing facilities at the junction of the A518 Newport Road and West Way, if required following post scheme monitoring.
- c) An undertaking to work with Castlefields Residents Association to develop an optimal solution for the area if evidence shows that on-street parking is causing an obstruction to traffic flows or an amenity issue.

- d) An undertaking to carry out post scheme monitoring of the actual impact of changes in traffic flows and speeds on the wider network and if necessary to implement traffic management and safety measures in the event that it is deemed necessary.
- e) An undertaking to carry out monitoring and evaluation of the scheme by collection of travel data collected one year and five years after opening for comparison with forecast predictions for the following:
- Peak hour traffic flows on key routes including Newport Road, Foregate Street, Chell Road, Station Road and Doxey Road;
 - Peak hour journey times on the routes assessed in the Traffic Forecast Report provided as an Appendix to the Environmental Statement;
 - An assessment of peak hour delays and reliability on key routes. This is currently calculated using Department for Transport GPS Trafficmaster data;
 - Traffic volume and speed characteristics will be used as appropriate to assess the change in greenhouse gas emissions as a result of the scheme; and,
 - Accident data will be regularly reviewed and any potential issues will be reported.
- f) To make provision for Network Rail to access the West Coast Main Line and remaining section of their siding, subject to securing the necessary land (freehold) required to deliver Section C. The access will be used to accommodate transit van sized vehicles and be completed with a turning area/parking for three van sized vehicles. It may also be necessary to provide a temporary access arrangement until a permanent solution is developed alongside the long term proposals for the land. Until such time, existing access arrangements will remain unchanged.
- g) To endeavour to agree with Western Power Distribution and other utility providers their requirements during construction of the SWAR and maintenance of their assets thereafter;
- h) To review air pollutants data post implementation of the SWAR in order to ratify modelled values; and,
- i) To provide a Landscape and Ecological Management and Monitoring Plan (LEMMP) for the disturbed and newly created landscape areas, habitats within the SSSI, including 5 year monitoring of the effects on the disturbed and newly created landscape areas, habitats within the SSSI, on the River Sow, on protected species and wintering birds within the SSSI, and, at the SWAR protected species crossing point.

The planning conditions heads of terms to include:

1. To define the site and conformity with submitted documents other than where further conditions indicate otherwise.
2. To require the development to commence within three years and require notification of commencement and when each section is brought into use.

Development Phasing

3. To require an update to the delivery programme prior commencement.

Site preparation and construction phase

4. To require a Construction Environmental Management Plan (CEMP) to be approved prior to the phased site investigations and trials, site preparation, demolition and construction works. The CEMP to include the following:
- a) A site management structure detailing responsibilities for the CEMP
 - b) A Site Waste Management Plan (ensuring that there is no burning on site and that waste is recycled/ re-used or disposed of to an authorised waste management facility)
 - c) A considerate construction/contractor method statement
 - d) The arrangements for the maintenance of access to neighbouring businesses and residents, and to pedestrian and cycle facilities
 - e) The Measures to protect the SSSI
 - f) Noise and Vibration Management Plan incorporating the measures to control construction noise and vibration, in accordance with BS 5228 'Noise Control on Construction and Open Sites' (or latest revision), including details of:
 - o the measures to control particularly noisy activities such as demolition and piling operations
 - o the anticipated evening, night time and early morning activities and the measures to control any noisy activities during those times;
 - o any acoustic fencing; and,
 - o measures to ensure that equipment to be left running outside of the construction works hours is not audible at the boundary of residential properties
 - g) Dust Management Plan incorporating the measures to suppress dust, generally described in the Environmental Statement Chapter 11.6 and including the sheeting or containment of loads being delivered to or removed from the site, and road sweeping
 - h) Construction Traffic Management Plan
 - i) Construction vehicle parking arrangements
 - j) Construction vehicle wheel wash facilities
 - k) Construction compounds and their means of enclosure
 - l) Construction compound/s including provisions to store fuels, oils and chemicals
 - m) Temporary storage compounds and stockpile areas (stripped and imported materials)
 - n) Temporary drainage arrangements
 - o) Measures to protect and monitor the River Sow and associated drains and wetland habitat
 - p) Measures to maintain the temporary closures and diversions (roads, cycle paths and footpaths) and signage
 - q) Measures to control construction lighting

- r) Invasive species method statement
 - s) Measures to protect breeding birds, reptiles, amphibians, harvest mouse and water shrew – including a method statement(s) for protected species and arrangements for the briefing of contractors, and, pre-commencement checks
 - t) Measures to protect vegetation including trees
 - u) A Water Management and Emergency Management Plan
 - v) Emergency procedures including pollution control contingency plan
 - w) Communication Plan for residents and businesses
 - x) A programme for implementation
5. To limit site investigations and trials, site preparation, demolition and construction works operating hours to 07:30 to 18:00 (Monday to Friday) and 07:30 to 13:00 (Saturdays) – subject to further limitations in relation to particularly noisy activities including demolition and piling. Also to provide for limited evening, night time and early morning working between 18:00 and 07:30 to allow activities such as road surfacing and temporary changes to the road layout (to be described in the CEMP).

Flood Compensation Scheme at Creswell

6. To require a detailed Flood Compensation Scheme at Creswell to be approved.

Surface Water Drainage and Flood Risk Management

7. To require a Surface Water Drainage Scheme based on sustainable drainage principles of the Drainage Strategy demonstrating that surface water discharge rates generated by all rainfall events up to the 100 year plus 20% (for climate change) critical rain storm must be restricted so that the new rate will not exceed the existing rate, and where possible provides a betterment on existing rates. The scheme shall include provision for the management and maintenance of surface water drainage for the lifetime of the development.
8. To require flood risk to be managed in accordance with the Flood Risk Assessment.
9. To require a detailed scheme for the diversion of the Broad Meadow Drain.

Contaminated Land

10. To require a Preliminary Risk Assessment for groundwater and contaminated land and if necessary a Site Remediation Strategy to include:
- a) Site Investigation Scheme
 - b) Remediation Scheme
 - c) Verification Plan

Landscape and Ecology

11. To require a detailed Landscape Plan to include enhancement measures for

green infrastructure including naturalised sustainable drainage systems, details of planting including percentage mixes, sizes, protection of woodland planting, details of ornamental planting, and details of a 5 year aftercare programme.

Environmental Protection

12. To require a scheme for the monitoring of the River Sow.
13. To require the protected species road crossing point to be installed.
14. To require bird breeding surveys
15. To require bird and bat boxes to be installed

Archaeology

16. To require a Historic Environment Management Plan detailing the programme of archaeological work to be carried out.

Footpaths

17. To require the reinstatement of footpaths/cycleways or diversions to be available when each section is brought in to use.

Lighting

18. To require the permanent lighting to be installed and maintained.

Knowledge of Permission

19. To require a copy of the permission and all associated documents to be available to the person responsible for the management of the site clearance, demolition and construction.

Informatives to include the following:

1. **Natural England**

To remind the applicant about the precautionary measures and requirements relating to protected species that may be required in the event that protected species are found during the works.

2. **Environment Agency**

To remind the applicant to:

- a) Follow the risk management framework provided in CLR11, Model procedures for the Management of Land Contamination, when dealing with land affected by contamination.
- b) Refer to the Environment Agency document 'Guiding principles for land contamination' for the type of information that we required in order to assess

risks to controlled waters from the site. Stafford Borough Council Environmental Health can advise on risk to other receptors, such as human health.

- c) Refer to their website www.gov.uk/environment-agency for more information.

3. Network Rail

To remind the applicant about:

- a) the formal Network Change process related to the permanent closure of the rail siding adjacent to the St Gobain premises; and,
- b) the requirements for engineering approval and completion of a Property Agreement prior to any works to Network Rail's Doxey Road bridge.

4. National Grid

To remind the applicant to contact National Grid regarding their gas and electricity apparatus within the Site.

5. Staffordshire County Council's Public Rights of Way Team

To remind the applicant to contact the Public Rights of Way Team regarding the process for making temporary and permanent diversion to the footpaths affected by the development.

6. Dealing with invasive plant species

To remind the applicant to have regard to the [Government advice](#) before submitting details of the measures to deal with invasive plant species.

7. Staffordshire County Council's Flood Risk Management Team

To remind the applicant to contact the Flood Risk Management Team to discuss the requirements for the Surface Water Drainage Scheme.

Case Officer: Graham Allen - Tel: (01785) 277299
email: graham.allen@staffordshire.gov.uk

A list of background papers for this report is available on request and for public inspection at the offices of Staffordshire County Council, No. 1 Staffordshire Place, Stafford during normal office hours Monday to Thursday (8.30 am – 5.00 pm); Friday (8.30 am – 4.30 pm).

Summary of the findings of the Environmental Statement (and environmental information subsequently submitted including the 'Addendum')

Chapters 1 - Introduction

This chapter introduces the background to the Environmental Statement (ES) and describes the purpose, requirements and guidance relating to Environmental Impact Assessment. It describes the site and the environmental constraints, and presents the planning policy considerations and describes the methodology and objectives of the ES, notably relating to the baseline conditions, the potential impacts, the assessment of the significance of environmental effects, and the mitigation measures.

Also outlined are assumptions and limitations of the ES, the scope and legislative requirements in producing the ES, the relevant contact information and opportunities for comments, and the future intentions for the delivery of the project in the area.

Chapter 2 – Proposed Development

This chapter describes the scheme objectives, outlines the alternative design options considered and presents the case for the proposals. It also describes the public consultation exercise that was carried out prior to an application being submitted and presents the anticipated construction operations and programme of works.

Further information and an Addendum was submitted to support the ES. This information included amendments to the application and an updated options appraisal and Comparison Table to demonstrate all the options considered and why the preferred option was chosen.

Chapters 3 – EIA Approach and Methodology

This chapter describes the methodology and objectives of the ES. Also described is the scope and legislative requirement of the ES, its structure and format of its technical topic chapters, the parties involved and their competence to undertake / contribute to Environmental Impact Assessment work. The assumptions and limitations of the ES are also outlined.

The Addendum acknowledges that as the result of the changes to the proposals, following topics have been reviewed:

- Ecology and Nature Conservation
- Drainage and the Water Environment
- Landscape and Visual Assessment
- Cultural Heritage
- Noise and Vibration
- Geology, Soils and Contamination
- Pedestrians, Cyclists, Equestrians and Community Effects
- Vehicle Travellers
- Cumulative Effect

The Addendum explains that no further assessment of Air Quality was necessary as there would be no impacts as the result of the design changes. Similarly, no changes were necessary to the Planning Policy section.

Chapter 4 – Planning Policy

This chapter provides a summary of the relevant planning history, sets out relevant legislation, planning policies, guidance and other material considerations. In addition to this, the applicant has submitted a separate Planning Supporting Statement which appraises the scheme against these policies.

Chapter 5 – Ecology and Nature Conservation

This chapter contains an Extended Phase 1 Habitat Survey Report based on published guidelines (Design Manual for Roads and Bridges, and CIEEM Guidelines for Ecological Impact Assessment). The chapter addresses the likely effects upon flora and fauna, and assesses the significance of effects on biodiversity assets likely to arise from the proposed development.

This chapter considers that the Scheme has been designed to avoid and minimise impacts on ecological resources and measures would be in place to reduce, mitigate and offset ecological impacts both during construction and operation of the Scheme.

Overall, the chapter concludes that with the appropriate mitigations measures in place there would be no residual significant adverse effects and a more positive impact on SSSI habitat is anticipated achieving overall neutral effect on protected and priority species.

The Addendum chapter identifies potentially significant effects upon ecological assets that are likely to arise from the design changes and determines whether or not these works would result in an overall change to the conclusions and findings as identified within the original ES. The chapter concludes that there would be no additional ecological impacts as the open span areas of the viaduct would allow wildlife to access green corridors.

With regards to the amendments of the proposed Pedestrian Crossing at Doxey Road, this would result in the width of the footprint of the Scheme being approximately 3m wider than that which was originally proposed. It is acknowledged that this change would affect the area of land permanently lost from Doxey and Tillington SSSI, with the loss of the habitat area amounting to approximately 1.01% of the total SSSI area (of 123.9 ha). Overall the increase in area of destroyed SSSI is 0.01% of the SSSI as the result of the amendments and is not considered to alter the significance of the assessment made in the original ES.

Chapter 6 – Drainage and the Water Environment

This chapter assesses the likely significant environmental effects of the proposals in respect of the water environment including rivers, streams, drainage ditches and groundwater. The ES is accompanied by a Flood Risk Assessment (FRA), which has been amended to take account of the Environment Agency comments.

The FRA includes a desk based study based on relevant sources including the Environment Agency, Staffordshire County Council and the Sow & Penk Internal Drainage Board (IDB), the Stafford Borough Council – Level 1 Strategic Flood Risk Assessment (2008) and South Staffordshire, Cannock Chase, Lichfield and Stafford – Level 1 Strategic Flood Risk Assessment (2014).

The ES has considered the significant effect during construction before the implementation of mitigation measures, which are set out below:

- Impacts on the proposed works:
 - Surface water flooding caused by disruption of existing watercourses and natural drainage paths.
 - Disruption of groundwater levels during the excavation of the flood compensation areas
- Impact from the proposed works:
 - Disruption of the flow regime of watercourses or drains as the result of construction of a new culvert required for Doxey Drain
 - Groundwater contamination and disruption to surface water flow as the result of the construction of the flood compensation area with the excavated material being deposited into Creswell Flash
 - Potential for impact through increased flooding situation in the local area and impacts on water quality/flow
 - Disturbance of silt, leading to the release of sediment

Following completion of the proposed works, the most significant impacts, before mitigation measures are considered and summarised as being:

- Potential for water quality changes within the SSSI as the result of the excavation of the flood compensation areas.
- Potential localised hydrological impacts associated with the flood compensation areas

Once mitigation measures have been implemented, the most significant residual effects are assessed as being:

- Proposed viaduct encroaching on the River Sow flood plain area may impact on flood water storage and flow;
- Potential increase in the predicted flood level upstream was anticipated and as a result additional compensatory storage has been provided.

The chapter concludes that during construction, the proposed highway scheme is both impacted by and impacts upon the surrounding water environment. The key impacts are associated with the excavation of the flood compensation areas and deposition of the excavated materials into Creswell Flash, flooding risk from surface water flows, construction of a viaduct, silt disturbance and pollution of local watercourses and groundwater. Once the works are completed, the scheme continues to impact on the wider water environment; however, the ES concludes there are no significant impacts on the scheme itself.

A range of mitigation measures are proposed for both the construction and operation phases of the proposed scheme, which include

- Careful storage of construction materials and plant to ensure that they are not damaged in the event of a flood.
- Carrying out further groundwater investigations before the construction phase and regular monitoring of the groundwater wells;

- Employing the necessary excavation techniques to ensure careful material placement into the flash without allowing any uncontrolled sediment plume spread across the water body and downstream within the drains.
- The proposed highway drainage system will incorporate SuDS techniques to intercept, store and treat surface water run-off before it is discharged into the local watercourse network.

The Addendum chapter considers changes to the design of the viaduct and the construction compound are unlikely to result in any additional impacts. No additional mitigation is proposed other than those that were originally proposed in the CEMP and inclusion of soakaways on the embankment section at either end of the viaduct.

Chapter 7 – Landscape and Visual Impact Assessment

This chapter provides a Landscape and Visual Assessment. This assessment defines the existing baseline character and visual context of the site, assesses the implications of the proposed development on landscape character and visual amenity through consideration key viewpoints/sensitive receptors and the nature of the predicted effect (magnitude of effect) and considers relevant mitigation.

This chapter concludes that due to its edge of town location which is the reason for restricted views towards the scheme, the effects of the landscape and visual impact would not be significant. However, the impact on Doxey and Tillington Marshes SSSI would range between high anticipated during the construction as the scheme would result in the loss of wet woodland habitat within the SSSI boundary and medium anticipated during Year 1 or Year 15 following the completion and operation of the scheme.

The Addendum chapter considers the potential impacts of the design change on landscape and visual resources. These considerations include a choice of materials and colours for the vertical walls to the piled embankment and existing and proposed vegetation which would soften the appearance. This chapter concludes that no further mitigation treatment would be required in this location.

Effects relating to temporary views of machinery/vehicles during construction phase would be reversible and would not change the conclusions of the Scheme Environmental Statement. No change to additional landscape treatment would be required.

With regards to relocation the construction compound re-location, construction activity would introduce machinery within the industrial context as well as increased vehicle movements. However, effects on landscape character would remain at moderate adverse magnitude during construction and no additional landscape treatment would be required to mitigate this change.

Chapter 8 – Cultural Heritage

This chapter includes an assessment of three cultural heritage assets. These assessments have been carried out in accordance with all relevant legislative and policy requirements for the potential impact upon cultural heritage features in and around the site (extending 550m either side of the proposed route).

The assessment finds that during the construction phase, without mitigation three major adverse impacts are anticipated on three historic building/structural assets – the Universal Factory Office Building (St Gobain), a brick culvert and a brick sluice. However, these buildings/structures are considered to be of low historic value.

The assessment identifies minor adverse effects on three archaeological assets at Greyfriars, Stafford (AM16) which could potentially contain remains of a friary, the River Sow flood plain (AM75) which is associated with potential organic deposits and Water Meadows, Doxey Marshes (AM82). The significance of the effect is assessed as Slight Adverse following mitigation.

The ES chapter concludes that the overall level of effect is not significant and with mitigation in place, the scheme would have a Slight Adverse significance of effect on the cultural heritage, with some slight beneficial significance on some of the assets of high, medium and low value.

The Addendum chapter considers the potential impacts of the design changes on cultural heritage. Although the changes to the design would have an impact during construction on the buried peat sequences and potential organic deposits (AM75) along the scheme, it would change from a Minor Adverse to a Moderate Adverse. This is due to the increased number and density of the piles, which alters the assessment of the significance of effect from a Slight Adverse to a Moderate Adverse. The operation of the Scheme would not change or alter the impact assessment or significance of effect on archaeological remains, historic buildings or the historic landscape character.

The operation of the scheme and relocation of the construction compound would not change or alter the impact assessment or significance of effect on archaeological remains, historic buildings/structures or the historic landscape character.

Chapter 9 – Noise and Vibration

This chapter assesses the road traffic noise and vibration on human receptors relating to the construction and operation of the scheme together with proposed mitigation measures. Assessment is carried out in accordance with the Design Manual for Roads and Bridges (DMRB).

The assessment of the change in road traffic noise levels at noise sensitive receptors is based on the following scenarios for the baseline year and the future assessment year:

- Do Minimum scenario in the opening year (short term)
- Do Minimum scenario in the future assessment year (15th year after opening) (long term)
- Do Something scenario in the opening year
- Do Something in the future assessment year

Predictions for vibration are based on guidance on the human response to vibration provided in BS 5228-2 and the associated significance given to the effect. The assessment concludes that construction works would give rise to potentially significant noise impacts for receptors within 100m of construction works. Once operational, the scheme would cause an increase in noise impacts in both the short term (opening year) and in the long term (15th year after opening). However, residual construction noise level would still be above the thresholds for potentially significant effects for short periods.

The Addendum chapter considers the potential impacts of the design changes on noise and vibration. No changes to the ES recommendations would be required with regards to the impact of amendments to the viaduct design and pedestrian crossing at Doxey Road. However temporary screening (noise barriers) along the boundary between the site compound and Campion Grove would be required to minimise construction noise from the

site compound which is likely to cause a significant effect at the closest receptors on Campion Grove.

Chapter 10 – Geology, Soil and Contamination

This chapter of the ES assesses the impact of the proposed development on ground conditions, land quality and soil contamination. In addition, this chapter considers the impacts of the ground conditions and potential contamination on the proposed scheme.

The ES concluded that superficial deposits would not be suitable for the foundations of the proposed viaduct and there is a potential compressibility and settlement risk that could occur following construction of the embankment on the peat deposits. Piles would be required therefore for the construction of the scheme.

There is low potential for encountering contaminated land on the site, however further soils testing and ground gas monitoring would need to be undertaken prior to construction and appropriate remedial measures put in place.

The Addendum chapter considers the potential impacts of the design changes on geology, soils and contamination and no changes to the ES recommendations would be required as a result of the amendments to the viaduct design and pedestrian crossing at Doxey Road.

The relocation of the construction compound at the St Gobain site may lead to surface runoff from the site which may impact the underlying soils and groundwater in surrounding areas without hardstanding. However, it is considered that the measures already proposed in the ES are sufficient to mitigate the impact arising from the construction compound relocation.

Chapter 11 – Air Quality

This chapter of the ES considers impacts of the demolition activities associated with the construction of the scheme as a potential air quality issue.

The results of the air quality assessment show that emissions of CO₂ within the scheme in the opening year. However, the operational phase of the proposed scheme is expected to have a negligible to slight beneficial impact on human health and the pollutant concentrations would be below air quality criteria. The ES concludes that the scheme would not have a significant effect on air quality.

There would be an increase in concentrations of nitrogen oxides and nitrogen deposition rates in a zone of the SSSI adjacent to the road as a result of the scheme. The habitats affected by raised levels are, however, not thought to be highly sensitive to the increase in nutrient levels; therefore the increase predicted is not expected to result in a significant adverse effect.

Chapter 12 – Pedestrian, Cyclists, Equestrians and Community Effects

This chapter of the ES considers the impacts on the users in terms of journey length, amenity and severance for the forecast years of 2018 and 2033 and concludes that during construction there would be two pedestrian diversions resulting from the temporary closure of footpath 46 and on the Doxey Road adjacent to Castletown which would have a slight negative impact.

Once the scheme is built, the new route between the Doxey Road and Foregate Street would provide small journey length benefits for over 1700 households when travelling to Madford Retail Park and the adjacent area. New pedestrian and cyclist crossing facilities would be provided to mitigate the impact although slight residual negative impacts would

remain, which include provision of pedestrian and cycle facilities along the route and provide safer connections to the National Cycle Network on the Doxey Road. An increase in traffic flows would also lead to a reduction in amenity in terms of noise, dirt and exposure to traffic. Mitigation could not be provided in an urban environment as pedestrians and cyclists need to travel alongside the road to access homes, services and facilities and to provide informal surveillance.

The Addendum chapter considers that as the result of changes to the scheme, there would be a need to change the toucan crossing proposed to mitigate the impact of the scheme at the new roundabout to the north of the Doxey Road and adjacent to Sainsbury's to a staggered toucan crossing. The design change does not affect the results of the assessment and the residual severance at these locations remains at slight.

Chapter 13 – Vehicle Travellers

This chapter of the ES considers the impacts on vehicle travellers as a result of the delivery of the full route. It is anticipated that drivers would experience some delay during parts of the construction period, and mitigation measures would be put in place to help offset the impact of these delays.

The completed scheme is expected to create moderate benefits in terms of overall driving conditions when compared to not delivering the road. However as the Vehicle Traveller assessment concludes, high traffic levels are expected to remain on parts of the network as a result of the cumulative impact of the housing and employment growth proposed through the Local Plan.

The Addendum chapter concludes that the design changes would not change the conclusions that have already been drawn in the ES.

Chapter 14 – Assessment of Cumulative Effects

This chapter of the ES describes the potential cumulative impacts that could arise from the interaction between the construction and operation of the Scheme and other major transport and land development projects in the area.

For the purpose of this ES, cumulative impacts have been defined as follows:

- **Type 1 effects** - Impacts that arise from the accumulation of different impacts at a specific location. For example, construction noise and visual intrusion affecting a receptor - individually these may not be significant, but the accumulation of different impacts may give rise to an overall significant impact.
- **Type 2 effects** - Impacts which are the result of the combination of activities associated with the scheme together with other development projects. For example, impacts caused by the construction of the scheme may be exacerbated by the construction activity from other major construction projects nearby or non-significant individual ecological impacts at different sites collectively may give rise to an overall significant ecological impact in the region.

During construction, the locations at most risk from cumulative impacts are those in close proximity to construction activities. Receptors in these locations are likely to experience the combined impacts of dust, noise, vibration and visual intrusion. The River Sow and Doxey and Tillington Marshes SSSI are also likely to experience the combined impacts of dust, noise and/or from a contamination incident during construction. With the implementation of

best practice mitigation measures as will be detailed in the Construction Environmental Management Plan (CEMP), the significance of the cumulative effect is considered to be minor to negligible adverse.

The overall effect is likely to be at least as significant as the worst identified individual environmental effect ranging from slight to moderate adverse depending on the receptor and would be temporary.

Noise

By year 15 of operation, the noise and vibration assessment showed that the majority of residential receptors are predicted to experience minor to negligible noise increases in the long term. No additional noise mitigation measures are proposed other than those assessed in chapter 9 of the ES.

During operation, Doxey and Tillington Marshes SSSI is also likely to experience the combined impacts of noise, nitrogen deposition, habitat loss, and risk of contamination from spillages due to road accidents or faulty vehicles. With the mitigation measures proposed, including restoration of 'destroyed' area of SSSI and suitable drainage design and due to the low value of the part of the SSSI likely to be affected by nitrogen deposition, noise and habitat loss, the cumulative effect is considered to be negligible beneficial.

With regards to the noise impact of the scheme on residents of new residential developments expected to be constructed by 2018, it is anticipated that they would be experience negligible and minor noise increases. In the long term, noise changes at these properties are expected to be negligible (less than 3 dB).

Air Quality

The air quality assessment predicted an imperceptible change in NO₂ and PM10 concentrations at R53, located just opposite the proposed Castle Street residential development. The impact of the scheme on new residents of this development is expected to be the same. No other air quality impacts are expected on new residents due to the location of the other proposed developments.

Landscape and Visual

With regards to the visual impacts, the highway users of Castle Street included within the earlier chapter of the ES, would have possible views of both the scheme and Castle Street residential development. Demolition activities on the Castle Street development site have already been incorporated in the landscape and visual assessment. In the long term, construction of the residential development is likely to improve existing views by replacing the derelict and partially demolished industrial units with landscaped new build. This, combined with the matured landscape mitigation planting of the scheme, is likely to result in a moderate beneficial visual effect on the highway users of Castle Street. No other identified visual receptors would experience views from the scheme in combination with another proposed development.

Cultural Heritage

The ES considers cumulative effects of the works on cultural heritage, which includes demolition of the non-designated Universal Factory office building on Doxey Road (HB21) and impacts on setting of Stafford Castle. In both cases the ES concludes that the resulting significance of effect will be slight adverse. The ES also takes into account the impact of the Castle Street residential development on the disused railway lines (AM66 and AM63) and concludes the significance of the cumulative effect on the 19th century transport infrastructure and related industrial development is considered to be negligible.

Nature Conservation

The ES assessment found that cumulative effects on Doxey and Tillington Marshes SSSI are likely to occur due to the construction and operation of the Stafford RUFC new club house and facilities and that both developments directly encroach on the SSSI. All effects could be mitigated through CEMP and standard mitigation measures have also been proposed to protect species. It is also expected that a CEMP would be developed by the contractors developing the Stafford RUFC new club house and facilities. The overall cumulative effect is anticipated to be slight adverse during construction.

During operation, cumulative impacts on Doxey and Tillington Marshes SSSI are likely to occur due to the increased recreational pressure and urbanisation effect of the proposed residential developments together with the increased noise and nitrogen deposition due to the operation of the scheme and of the Stafford RUFC new club house and facilities. Operational noise and nitrogen deposition resulting from the scheme itself were not deemed to significantly affect the SSSI or the SSSI's breeding and wintering birds. The overall cumulative effect is anticipated to be slight adverse during operation.

Drainage and Water Environment

The ES considers that overall the significance of the cumulative effect on the water quality of the River Sow and Broad Meadow Drain is considered to be negligible adverse both during construction and operation stages.

With regards to the flood risk issues, the ES concludes that based on the flood modelling undertaken for the proposed scheme (incorporating compensatory storage) there would be a net reduction (albeit small) in the number of properties at risk of flooding. Overall no significant cumulative increase in flood risk is anticipated.

Vehicle Travellers and Pedestrians, Cyclists, Equestrians and Community Effects

The cumulative effects on driver stress, changes in amenity and community severance of these other transportation schemes and planned growth together with the scheme have been incorporated in the results from vehicle travellers and pedestrians, cyclists, equestrians and community effects assessments provided in Chapters 12 and 13. The ES considers that the cumulative traffic impact of all proposed housing and employment growth identified in the Adopted Local Plan to 2031 will be mitigated by the delivery of the wider package of measures as proposed in the Stafford Borough Integrated Transport Strategy 2013.

Chapter 15 – Environmental Management Plan

This chapter explains how the likely environmental impacts identified within the environmental assessment have been incorporated into the detailed design to ensure that these impacts are managed as the scheme would develop. The chapter summarises the information listed in the ES chapters identifying issues, summarises the proposed mitigation/enhancement measures and identifies where there is a need for further assessment/survey and monitoring both during construction and operational stages.

Non-Technical Summary of the Environmental Statement

A non-technical summary of the ES was also provided.