CPRE Staffordshire response to the Stafford Gateway Masterplan consultation

September 2022

Executive Summary

CPRE Staffordshire supports the use of previously developed land to meet housing need. Whilst we do not object to the Stafford Gateway development in principle, we are concerned that the proposals in their current form are not sufficiently ambitious in responding to the challenges of the climate and ecological emergencies. We urge developers to follow the Building with Nature (BwN) 2.0 standards – an evidence-based benchmark for high-quality green infrastructure.

Full Response

CPRE Staffordshire supports a 'brownfield first' approach and the use of previously developed land to meet housing need. Firstly, this reduces the amount of countryside lost to development. Secondly, transport accounted for 27% of the UK's total carbon emissions in 2019. Of this, the majority (91%) came from road transport vehicles[1]. Better spatial development patterns and denser urban "infill" development of the type proposed in the masterplan offer an opportunity to help reduce such emissions and contribute to meeting the UK's net zero targets.

Rather than car-dependent greenfield developments on the edge of towns or villages, a development on previously used land close to the town centre and railway station will help prevent sprawl. It will also make the use of public transport, walking and cycling by future residents more viable.

However, whilst we are supportive of the development location in principle for the above reasons, we have some reservations about the design. The proposals as they stand are in our view not ambitious enough in responding to the climate and ecological emergencies.

There could be a real opportunity here to create a development that is fit for the future: communities with a sense of place; active travel infrastructure embedded throughout, with less space allocated to cars; rooftop solar; high-quality green infrastructure that maximises biodiversity; and homes that are both energy-efficient and adapted to a changing climate.

It is imperative that high-quality green space is incorporated into the proposed development, both for the wellbeing of future residents and to provide habitat connectivity

[1]Transport and Environment Statistics: 2021 Annual Report (publishing.service.gov.uk)

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for wildlife. The current wildlife corridors around the site should be retained, with a new corridor created along the Doxey Brook.

Given that the entire site falls within SSSI impact risk zones and is located near to several local nature reserves, there is a risk that valuable wildlife habitats could be adversely affected. The existing biodiversity of the site needs to be comprehensively surveyed and mapped by professional ecologists before any development takes place.

The aim must be to achieve Biodiversity Net Gain throughout, although this should not be used as an excuse to destroy habitats with the promise to recreate them elsewhere. For example, there are several species of wild orchid and other wildflowers in the grassland around the Roots plastic-free shop off the Newport Road.

There is little mention of building nature into the development. We urge the developers to follow the Building with Nature (BwN) 2.0 standards – an evidence-based benchmark for high-quality green infrastructure. The standards are free to use and should be integrated into project development as early as possible. For more information, please see: https://www.buildingwithnature.org.uk/

Active travel

The cycle path in the 'Station Gateway' and 'The Hollies' does not match the LTN 1/20 guidelines, as it is neither separated from traffic nor wide enough for bidirectional flow. The cycle path in 'The Hollies' leads directly to the Newport Road, which has no cycle lanes. There are no dedicated cycle paths in Marling Terrace, Castle Engine Works, Wicketgate and Doxey Road. A cycle path, similar to the design used in 'Lakeside', should be created to link all the zones together. Active travel routes to schools should also be included in the design.

There is even scope to be truly ambitious and plan a development on part of the site that uses Vauban in the German city of Freiburg as a model. Homes in Vauban are extremely energy-efficient (some are "passive houses"), and car ownership is discouraged. Cycling is the primary mode of transport and roads are designed for pedestrians rather than cars.[2]

Affordability

We support the aim of ensuring that a minimum of 30% of all units provided on site are affordable tenures, but note with regret the caveat that this is subject to developers' own assessments of viability. We urge the council to set a requirement for 30% of units to be affordable or for social rent.

Place-making

Much of the opposition to new developments can be attributed to concern over the increased pressure on already overstretched services (particularly healthcare and schools), traffic congestion, and the poor quality of many proposed designs. It is important that this

[2] https://www.bbc.com/travel/article/20200715-freiburg-germanys-futuristic-city-set-in-a-forest

development uses a high standard of design throughout if it is to achieve the stated ambition of “high-quality housing set in beautiful new green space”.

Examples of good design including attempting to create a community with a distinctive character, good walking and cycling infrastructure, ensuring that roads are not too narrow, and the inclusion of well-designed play areas and public open spaces. A recent audit of over 140 developments by CPRE and Place Alliance, based at University College London, found that one in five of these developments should have been refused planning permission as their poor design was contrary to advice given in the National Planning Policy Framework. A further 54% should not have been granted permission without significant improvements to their design having been made first.[3]

[3] https://www.cpre.org.uk/wp-content/uploads/2020/03/Place-Alliance-A-Housing-Design-Audit-for-England_2020.pdf