



Yarnfield and Cold Meece Parish Council

Stafford Borough Council Preferred Options Consultation Response – Meecebrook Garden Community

1 Introduction

- 1.1 Yarnfield and Cold Meece Parish Council acknowledges Stafford Borough Council's preferred option of Meecebrook Garden Community to address the local housing need over the next 20+ years. We welcome this opportunity to comment, but request in the strongest possible terms that our parish, with Chebsey and Eccleshall, is actively engaged in the refinement of future plans.
- 1.2 The councillors understand that Meecebrook has emerged as the preferred site largely due to the opportunities for scale and ambition it represents.
- 1.3 We accept the need for new housing in the Borough and we understand that the duty to cooperate requires the Borough Council to consider unmet need for housing within the region as well as locally.
- 1.4 We recognise the desire to create capacity within the workforce to support economic growth.
- 1.5 We would like to see high quality new housing built in Stafford Borough with careful consideration given to connectivity, community, employment, education, health and wellbeing for new residents and existing communities.
- 1.6 However, having studied the Preferred Options paper and associated evidence we believe that Meecebrook appears to be at best an unrealistic aspiration and at worst a costly social experiment which is highly likely to fail. The impacts of this will be felt most keenly by the residents of Meecebrook and the three parish councils but the financial burden will be borne by the residents of the whole of the Borough.

2 Timing of the Consultation

- 2.1 Meaningful assessment and analysis is difficult as this consultation is happening ahead of the publication of the Meecebrook Masterplan. Appendix 9 of the Local Plan is frustratingly blank, and we only have a concept map to consider.
- 2.2 Since the devil will be in the detail, our comments are by necessity limited to points of principle and will often be presented as questions.
- 2.3 We would like to have raised many of these comments and questions over the past 3 years, which would have given Stafford Borough Council the benefit of accommodating local knowledge and expertise within the published plans.

3 Fundamental assumption that one large new development is best

- 3.1 **The focus on the creation of a garden community, at the expense of housing development in existing settlements, threatens the growth and sustainability of rural communities.**

- 3.2 **Careful consideration needs to be given to the cost of infrastructure associated with large scale development and the unintended consequences of delayed provision of major infrastructure projects.**
- 3.3 **There is a fear that Meecebrook would become a “black hole” drawing in all future investment at the expense of existing settlements.**
- 3.4 There is a perceived perception within the Preferred Options that development in existing settlements is bad; that it will be opposed by residents and will undermine the quality of those settlements. Yarnfield has seen a 55% increase in the number of houses during the life of the existing local plan. These developments have enhanced and added to the diversity of the parish, resulting in a shift in the age profile of the parish without which Yarnfield would have become an increasingly elderly population with little or no future for the community.
- 3.5 Developments within rural settlements, supported by neighbourhood plans, will provide for renewal of housing stock and an opportunity for upgrading and improving local infrastructure and facilities across the whole of the borough. Without the s106 monies that currently support local communities, how does Stafford Borough Council propose to fund community infrastructure improvements?
- 3.6 We can find no evidence in the Preferred Options that demonstrates how, and at what cost, development sites in the existing settlements might be supported nor evidence to show that such developments would support improvements to local infrastructure projects. There is a fear that Meecebrook would become a “black hole,” drawing in all future investment at the expense of existing settlements.

4 Fundamental re-evaluation of the Sustainability Proposal

- 4.1 **We believe the Meecebrook proposals are fundamentally flawed, and the review of the Sustainability Appraisal fails to take account of the withdrawal of the MOD Swynnerton site.**
- 4.2 The Meecebrook Garden Community Concept documents states that “The concept of locating a new settlement at Cold Meece is not a new one and has been mentioned since munition production at MOD Swynnerton ceased after WW2. The concept for this new settlement was revisited in 2015, gaining further momentum when it was included in the HS2 inspired Constellation Partnership Growth Strategy which was submitted to Government in early 2017”
- 4.3 The scheme has been developed over a number of years, with a great deal of money spent on staff time, consultants and other spending, yet there still seems to be no evidence presented to demonstrate that the new town is viable, or deliverable as proposed.

5 Housing Numbers

- 5.1 **We believe the proposed housing numbers are not justified and unnecessary to meet the future housing needs of the Borough.**
- 5.2 **Stafford Borough Council needs to demonstrate the additional housing numbers are supported by requests from neighbouring local authorities.**
- 5.3 **We believe the Preferred Options does not account for the true level of windfall homes that will come forward during the plan period.**
- 5.4 **We do not consider that Meecebrook can be justified by the need to deliver additional housing and employment land in the Borough.**
- 5.5 The minimum figure for local housing need set by national guidance (calculated in accordance with the standard methodology outlined in the Planning Practice

Guidance) of 391 new homes per year would produce a requirement for 7,820 dwellings over the life of the plan.

- 5.6 The Stafford Borough Economic and Housing Development Needs Assessment (Lichfields 2020) proposes that, to supply the workforce to support the core employment growth forecast, the borough's housing need equates to 435 new dwellings each year which would produce a requirement for 8,700 dwellings over the life of the plan.
- 5.7 The addition of a further 2,000 dwellings to provide for migration has been done to justify the development of Meecebrook and is unsupported by evidence of need or requests from other local authorities.
- 5.8 The Black Country Consortium who supported the principle of Stafford Borough Council providing housing to support need for the Consortium was made in 2020. However, the Sustainability Appraisal of the Black Country Plan: Regulation 18 SA Report, July 2021 makes no reference to Stafford; "The neighbouring authorities which would be likely to take some of the housing and employment need for the BCP are: South Staffordshire; Shropshire, Solihull, Lichfield; and Cannock. Further exporting to Telford and Wyre Forest is also being considered." para - 1.4.3
- 5.9 The Preferred Options proposal is based on only 6% of housing being provided through windfall sites, accounting for only 750 windfall homes. The Borough Council routinely monitor housing completions and from this it is clear the average of 400+ dwellings per year were built on windfall sites.
- 5.10 Supporting the development of windfall sites will give greater weight to the benefits of using appropriate sites within existing settlements and is so doing support the viability of those settlements.

6 Affordable Housing

- 6.1 **Meecebrook lies in two parish council areas, Eccleshall and Chebsey. Planning Policy 23 sets different affordable housing quotas for these parishes which will lead to inconsistency across the proposed development.**
- 6.2 **Policy 23 should be amended to require a 40% affordable housing quota across the whole of the Meecebrook development.**
- 6.3 **The Master Plan should ensure that affordable housing provision within the site should be fully integrated within the overall housing plan and not marginalised to specific areas and should be phase to occur alongside the general housing development.**
- 6.4 Policy 23 defines the approach of Stafford Borough Council to affordable housing and this policy appears to be sensitively and sensibly written. Has a decision been made about the location and composition of affordable housing as the requirements are very different regarding greenfield sites in Chebsey and Eccleshall?

7 Garden Community – Infrastructure Fund

- 7.1 **Will the reduced scale of development prevent the Meecebrook Development Board securing national infrastructure funding?**
- 7.2 We note the change in name for Meecebrook from "Garden Village" to "Garden Community." This we assume is needed because of the reduction in scale of the proposal following the withdrawal of the MOD site at Cold Meece. The Garden Community concept was to see 10,000+ houses developed. This however has now been downgraded to 3,000 houses in the plan period and a possible further 3,000 in the future.

7.3 This scale of development will inevitably bring reduced opportunities for capital investment required to deliver the infrastructure proposals to create a complete self-sufficient, off-grid, community.

8 Unintended consequences

8.1 **No account appears to have been taken for the impact on surrounding settlements arising from housing developments coming before essential infrastructure: schools, roads, transport links and health services.**

8.2 We are concerned that we have not seen an assessment of the impact of Meecebrook on surrounding communities. The AECOM SA provides insight into the impact on biodiversity, land and flooding but the scope of the brief is limited, and the focus is more on opportunity than mitigation.

8.3 Some of the unintended consequences will occur as a result of the phasing of the development, where dwellings are occupied long before the infrastructure designed to support the communities and others will undoubtedly centre around unplanned cost rises.

8.4 The infrastructure to support the community is unlikely to be financially viable until the population reaches a certain point, meaning that the people who move into homes in the early phases of development will establish lifestyles dependent on car travel. Those residents who embrace the environmentally friendly car-free ambition may find themselves isolated. A cohesive and self-sufficient, sustainable community would need to be enabled from the outset, rather than retrofitted once private businesses calculate they will get a reasonable return on their investment.

8.5 We know from experience that it is difficult to bring people together in a diverse community without facilities and activities that give them motivation and opportunity to mix.

8.6 Other unintended consequences will arise because of unanticipated cost increases leading to compromises have to be made and spending prioritised on whatever is deemed to be most essential and/or cost effective. This scenario would undoubtedly undermine the concept and viability of the garden community.

9 Mitigating or responding to unintended consequences.

9.1 **We are concerned that consultants' reports have a tendency to tell the client what they want to hear, particularly when further commissioned work is anticipated, and when they do highlight risks, these can be overlooked.**

9.2 Overly optimistic predictions and best case scenario calculations are likely to mean that insufficient funds are available to mitigate unintended consequences. Worse still, responsibility for aftercare (of residents' wellbeing, community cohesion, buildings, services, roads, pavements, cycle ways, water courses, natural spaces etc) can easily be dodged and those who might have been accountable are long-gone once problems are evident.

10 Over-promising

10.1 **We are concerned that the Meecebrook Vision is founded on a promise to provide services and community facilities that rely entirely on others to deliver.**

10.2 We are concerned that it is not within the gift of Stafford Borough Council to promise a railway connection, schools or healthcare provision. However, it is these very advantages that have caught the imagination of the media (through targeted briefing) and local people.

11 Healthcare

- 11.1 **We are concerned that in section L of Policy 7 healthcare provision is excluded from the list of amenities which must have guaranteed funding before development can commence.**
- 11.2 There is a national shortage of primary care professionals - GPs, practice nurses, dentists, community pharmacists etc. The national shortage of residential and domiciliary care is at a critical level. The shortfall is not due to a lack of premises but due to a lack of staff. The reasons for this are complex: political, social and economic.
- 11.3 A recent study by the Health Foundation think tank (June 2022) predicts a national shortfall of 10,700 GPs by 2030/31 and 6,400 nursing vacancies in GP practices by 2030. To make matters worse, Stafford currently has the 7th highest number of patients per GP; 2,537 against a national average of 2,038.
- 11.4 A National Audit Office survey of NHS dentistry in February 2020 indicates that England has an average of 4.4 dentists per 10,000 population, where Italy has 8.3 and Germany 8.5. However, the regional breakdown shows that in North Staffordshire the ratio is just 3.7:10,000 which makes the area the fourth worst in England. When the NAO analysed unsuccessful attempts to get an appointment with an NHS dentist, North Staffordshire was the third worst area.
- 11.5 Similar staff shortages are being reported across a range of NHS professions.
- 11.6 In England ambulance services are now taking an average of over 59 minutes to respond to Category 2 (emergency) calls against a target of 7 minutes. This is the longest average response time since records began.
- 11.7 Regarding Meecebrook, we understand there is a plan to liaise with the local Clinical Commissioning Groups. This should actually be easier now since the CCGs' commissioning functions have been taken over by the Staffordshire Integrated Care Board which includes Local Authorities and GPs in its membership.
- 11.8 However, unless there is a strategic drive with significant additional funding made available to train, incentivise and recruit more primary care professionals in Staffordshire, Meecebrook might struggle to staff a community health centre and it is far from certain that new primary healthcare services will be approved by NHS England, especially during the early phases of the development.

12 Schools

- 12.1 **We are concerned that the promise of a new school for the children of the Meecebrook proposal will not be developed until well into the project with the inevitable consequence that pressure will be placed on existing local schools.**
- 12.2 Have new schools been pledged by Entrust on behalf of Staffordshire County Council? We imagine that even if this is the case, the schools will not be viable in the early stages of the development and therefore road transport will be needed to take children to schools outside of the development. We are not aware of any demographic projections for Meecebrook, nor any feasibility study regarding surplus capacity in local schools that might assure head teachers and parents that the quality of education offered to our children will not be compromised in any way.
- 12.3 It is worrying to note that the Staffordshire County Council Strategic Infrastructure plan estimates that at least 1,000 new houses would be needed to support the provision of a one class intake at primary school level.

12.4 We are aware that in Stone there is a three tier school system, but Eccleshall forms part of the Stafford school system which is two tier. Has the Meecebrook Board considered the implications of this on the allocation of school places?

13 Land

Best and most versatile land (BMV)

13.1 **We are disappointed to see that significant areas of Grade 2 BMV agricultural land are proposed to be lost to housing and ask whether there has been any consideration of how this might impact on our regional and national food security policy, and on the future of farming in our Borough?**

13.2 Paragraph 9.11.3 of the AECOM Sustainability Appraisal (SA) date July 2022 states that "The national dataset serves to suggest a likelihood of Meecebrook being associated with significant areas of 'grade 2' land." It then continues by concluding that, "...it seems likely that Meecebrook comprises BMV land."

13.3 Paragraph 9.11.1 states that: "A foremost consideration here is the need to avoid the loss of agricultural land classed as 'best and most versatile' (BMV), which the NPPF defines as that which is grade 1 (highest quality), grade 2 or grade 3a.

13.4 The National Planning Policy Framework (NPPF) 2021 includes policies to protect BMV land. For example, paragraph 174 of the NPPF states that:

"Planning policies and decisions should contribute to and enhance the natural and local environment by:

a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland."

13.5 Paragraph 9.11.7 of the Sustainability Appraisal concludes that: "With regards to the selection of greenfield allocations, avoiding the loss of BMV / better quality BMV agricultural land appears not to have had a major bearing on the spatial strategy and site selection process, and there are reasonable alternatives that perform better than the proposed strategy..."

Previously developed (brownfield) land

13.6 **The proposed Garden Community could have made a significant impact on remediating previously developed land and an opportunity has been missed by selecting Meecebrook over the other possible sites that do include previously developed land as well as potentially being better located to existing road and possibly rail infrastructure.**

13.7 Paragraph 85 of the NPPF states that: "The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist."

13.8 Paragraph 119 of the NPPF states that: "Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed or 'brownfield' land."

13.9 Despite this requirement, paragraph 9.11.7 of the Sustainability Appraisal concedes that: "A fairly limited proportion of growth [within the 2020-40 local plan] is set to be directed to previously developed land", before concluding that:

"...there is no identified 'reasonable alternative' strategy that would perform better in this respect."

- 13.10 Yarnfield and Cold Meece Parish Council is aware that preliminary proposals for the Meecebrook development had assumed that it would incorporate large parts of the nearby Swynnerton Training Camp owned by the Ministry of Defence (MOD).
- 13.11 Appendix IV of the 2022 Sustainability Appraisal concedes that when it states "...extensive areas of land thought to be available at the time of the Issues and Options consultation is now unavailable (specifically MOD land at Swynnerton Training Area...)".
- 13.12 It is then stated that "This led the Council to undertake further work to explore land availability, following the Issues and Options consultation, which led to additional land being identified as available. The net effect is that the current site 'red line boundary' is shifted significantly to the west, in the direction of Eccleshall, relative to the assumed red line boundary at the time of the Issues and Options consultation."
- 13.13 Yarnfield and Cold Meece Parish Council is concerned that this statement implies that rather than reassessing the suitability of the Meecebrook site for development in the absence of the availability of the previously developed and contaminated land within the MOD's ownership at Swynnerton, Stafford Borough Council simply moved the redline boundary to incorporate more agricultural land on the assumption that it was feasible to be able to obtain a train station and possibly a new motorway junction to serve the site.

14 Land acquisition

- 14.1 **We believe that some landowners whose land is inside the "red line" of the Meecebrook proposal are not prepared to sell their land to the Development Board.**
- 14.2 We understand that compulsory purchase orders are not planned. The refusal by landowners to allow their land to be included within the proposal further undermines the viability of the project and moved it even further away from the stated vision.

15 Carbon neutral development

- 15.1 **We believe a detailed CO₂ balance for the whole life of the project is essential to demonstrate the claim that the Meecebrook Project will produce "carbon neutral communities."**
- 15.2 The development of Meecebrook on best and most versatile land will result in the release of CO₂ during the development phase and the subsequent loss of a significant CO₂ bank.
- 15.3 No evidence has been provided to assess the CO₂ balance associated with the development of Meecebrook on a greenfield site.

16 Minerals

- 16.1 **We are concerned that the proposed Meecebrook development will sterilise mineral deposits on this "Mineral Safeguarding Area."**
- 16.2 **Given the requirements of local minerals policy, Yarnfield and Cold Meece Parish Council wishes to understand whether there are any proposals for exploiting any remaining and economic mineral resources within Meecebrook prior to its development to avoid or minimise their sterilisation?**
- 16.3 The section regarding Meecebrook within the 'New Local Plan Preferred Options' is silent with respect to the location of minerals within the proposed site. However,

comparison with the extant *'Policies and Proposals Map for the Minerals Local Plan for Staffordshire (2015-2030)'* shows that a significant part of the site is located within a *'Mineral Safeguarding Area'*.

- 16.4 The minerals underlying the part of the Meecebrook site within the Minerals safeguarding Area are sand and gravel.
- 16.5 Policy 1 of Strategic Objective 1 of the Minerals Local Plan recognises the importance of sand and gravel deposits as aggregate minerals to support sustainable economic development.
- 16.6 Policy 3 of Strategic Objective 1 of the Minerals Local Plan sets out the importance of such safeguarding nationally and locally important and sets out how it is proposed to prevent resources being sterilised by non-mineral development.
- 16.7 Policy 3 includes requirements for potentially permitting the sterilisation of minerals. Specifically, it requires prospective developers to produce evidence about the existence; quantity; quality and value of the underlying or adjacent mineral resource, and also to outline reasons why the material planning benefits of the non-mineral development would outweigh the material planning benefits of the underlying or adjacent mineral.

17 Radon

- 17.1 **We can find no evidence that the effect of Radon gas on future developments within the Meecebrook proposal has been taken into account.**
- 17.2 Land within the footprint of the Meecebrook proposal is known to be affected by Radon. We can find no assessment of this risk. The presence of radon gas will have consequences for housing developments which will need to build in appropriate measures to protect properties and therefore have an adverse effect on the viability of sites.

18 Areas of Contaminated Land

- 18.1 **We are concerned that there are known areas of contaminated land on or adjacent to the Meecebrook proposal.**
- 18.2 Adjacent to Hilcote Hall is believed to be an area of contaminated land and while it is outside the "red line" for the Meecebrook development the effect will extend 250m into the development area. The area is shown as suitable for housing. If this land remains in the plan investigation into the cost of remediation will be required.

19 Railway Station

- 19.1 **We are concerned that passenger forecasts, both in terms of physical numbers, and when they might occur, are unrealistically optimistic and need to be reassessed.**
- 19.2 **We believe the capacity and rail layout constraints resulting from the HS2 proposals will mean Meecebrook could only be served by one four-car train per hour in each direction and that trains could only utilise the slow lines.**
- 19.3 Although a total of eight station locations were considered, all of these are located on the West Coast Mainline (WCML).
- 19.4 The preferred North option is located to the north of the junction with the Norton Bridge to Stone railway. Since there is no connection between the railways to serve the site, only stations located on the WCML will be directly accessible to future Meecebrook travellers. Consequently, it will not be possible to travel by rail

to either Stone or Stoke-on-Trent without changing trains at Stafford. This is likely to put off most potential travellers wanting to access these destinations.

- 19.5 It is proposed to construct platforms alongside all four tracks of the WCML. However, this is not considered realistic for numerous reasons that are set out below.
- 19.6 The demand forecasts for Meecebrook station are based on passengers living within the development itself; those living locally within a 5km radius of the station; and those passengers abstracted from other stations that would choose Meecebrook station as a preferred alternative.
- 19.7 The only notable settlements located within 5km of Meecebrook are Eccleshall and Yarnfield and the nearest alternative station from which passengers could be abstracted is at Stone, which is located on a different railway line, with direct access to destinations, such as Stoke-on-Trent, which cannot be directly accessed from Meecebrook.
- 19.8 It is assumed that Meecebrook station could be opened by 2026 to receive two stopping trains per hour based on trains paths that SLC and Rail Aspects consider will be created by the opening of HS2 Phase 2a. However, main civil engineering construction of Phase 2a is not expected to commence until Quarter 1 2025. With a seven-year construction and track commissioning programme, Phase 2a will not open until 2032 at the earliest. Indeed, it is likely to be later than this as HS2 Ltd has stated that Phase One will be completed between 2029 and 2033. With HS2 Ltd's Chief Executive informing the Transport Select Committee on 2nd November 2022 that Phase 2a is running four years behind Phase One, it is very unlikely that Phase 2a would open before the end of 2033.
- 19.9 When HS2 Phase One opens, all HS2 services north of Birmingham would use the fast lines on the section of the WCML north of Stafford, which would reduce capacity until Phase 2a opens.
- 19.10 In addition, the design of the Phase 2a connections back onto the WCML at Blakenhall, south of Crewe, involves crossing over the slow lines to access the fast lines. This will significantly reduce the number of paths on the WCML slow lines.
- 19.11 Rail Aspects has assumed that Meecebrook station would be served by two trains per hour in each direction. These are the current North West Trains services:
- Crewe to London via the Trent Valley
 - Liverpool to Birmingham
- 19.12 The Crewe to London train starts/ends in a bay platform at Crewe station and currently utilises the WCML slow lines to access the station. The design of the Blakenhall Spurs connection onto the WCML south of Crewe means that it is extremely unlikely that this service could continue once Phase 2a becomes operational.
- 19.13 When Phase 2b opens (2040 at the earliest) some HS2 trains will bypass the Blakenhall Spurs to pass under Crewe via the Crewe Tunnel. However, the cancellation of the Golborne link (a 25km section of high-speed railway that would have connected Phase 2b from Hoo Green in Cheshire to the WCML south of Wigan) means that only Manchester bound HS2 trains will be able to utilise the Crewe Tunnel. All other HS2 services (3 trains per hour in each direction) will continue to use the Blakenhall Spurs and therefore take up valuable paths on the WCML from south of Crewe and throughout Cheshire, thereby leaving insufficient train paths to enable the Crewe-London service to continue.

- 19.14 The Liverpool to Birmingham train is a four-carriage commuter train that utilises the WCML fast lines through Crewe station. Although it would not be impacted by the Blakenhall Spurs issue, because it needs to access the Birmingham line from Stafford, it would need to have crossed onto the WCML slow lines at Basford Hall south of Crewe.
- 19.15 Since there are no current locations on the WCML between Basford Hall and Meecebrook to switch back onto the fast lines, the Birmingham to Crewe train would remain on the slow lines.
- 19.16 Given the capacity and rail layout constraints outlined above, it would appear that Meecebrook could only be served by one four-car train per hour in each direction and that that could only utilise the slow lines.
- 19.17 Table 1 in the SLC report states that Meecebrook station is expected to generate nearly 45,000 trips by 2026, with more than half these journeys generated from the development itself. By 2030 it is expected that over 133,000 trips would be generated by the Meecebrook development. With the first 300 houses planned for construction in 2030/31 and Phase 2a not opening until at least 2032, the predicted trip numbers would be unachievable.

20 Road Networks

20.1 **We are concerned that:**

- (a) Unless significant new road infrastructure is constructed by 2030, access to the proposed site is only achievable from either the B5026 Eccleshall Road or via the unclassified Swynnerton Road.**
- (b) The claim that Meecebrook is located in close proximity to the Strategic Road Network is unfounded.**
- (c) The local road network around Yarnfield, Cold Meece, Chebsey and Eccleshall is at capacity and is not viable to support the number of vehicle movements that the Meecebrook development will create.**
- (d) No evidence is presented in the Preferred Options document to support the notion of a new motorway junction.**

- 20.2 It is not possible to undertake a thorough review of the proposals because the Atkins Transport Strategy dates from 2020 and the proposed Transport Logistics Plan is not currently available.
- 20.3 Notwithstanding this constraint, we note that, unless significant new road infrastructure is constructed by 2030, access to the proposed site is only achievable from either the B5026 Eccleshall Road or via the unclassified Swynnerton Road.
- 20.4 The Atkins Transport Strategy claims in Section 1.3 that “The site is located in close proximity to the Strategic Road Network (SRN) with J14 of the M6 located approximately 11km to the south and J15 of the M6 located approximately 8km to the north.” Such distances cannot reasonably be considered close to the SRN, especially since the roads that would need to be utilised from the two motorway junctions are significantly constrained.
- 20.5 Although J14 is potentially closer to Meecebrook, the most direct route is reliant on the use of the A5013 through the villages of Creswell and Great Bridgeford, as well as the heart of Eccleshall. Alternatively, construction traffic would need to use the A34 to Stone and then the A5026 from the Walton Roundabout. Such a diversion would add an additional 3.5 to 4km each way to this supply route.
- 20.6 The route from M6 J15 to the north is also constrained, especially at the busy Hanchurch interchange between the A519 and the A500.

- 20.7 Both motorway junctions will be significantly impacted by HS2 construction traffic, with J15 adjacent to Hanchurch particularly vulnerable as it will be used to supply 17 HS2 construction sites, including via the A519, which would represent the key route to supply construction materials to Meecebrook from the north.
- 20.8 HS2 Phase 2a is scheduled for a minimum five-year construction programme and although this is currently proposed to commence at the beginning of 2025, there is a risk of cumulative effects occurring with the Meecebrook development, especially in the reasonably likely event that the HS2 project construction is delayed or prolonged.
- 20.9 As a consequence of the above, it is important that a full analysis of the HGV movements associated with the Meecebrook proposals is carried out and accompanied with an assessment of the cumulative effects of traffic and especially interaction with HS2 Phase 2a construction traffic, which is likely to overlap with Meecebrook in the early years. It is important that this analysis is undertaken both for entire construction period and in relation to the employment centres on the site.
- 20.10 Paragraph 9.2.4 of the AECOM Sustainability Appraisal Interim Report dated October 2022 states that "Meecebrook may be delivered alongside a new junction on the M6, thereby ensuring that traffic could be directed to the strategic road network..."
- 20.11 No evidence is presented in the Preferred Options document to support the notion of a new motorway junction. Furthermore, this idea (referred to as J14A) has been raised and rejected previously, notably in evidence given by representatives of Stafford Borough in front of the HS2 Phase 2a House of Commons Select Committee in May 2018. There is therefore no provision for J14A in the hybrid Bill for HS2 Phase 2a, which became an Act of Parliament when the Bill received Royal Assent on 11th February 2021.
- 20.12 Paragraph 9.13.4 of the AECOM report states that "The new proposed [Meecebrook] site is notably located between strategic road corridors, such that there will be a need to ensure good links, and the possibility of having to bridge over one or both of the M6 and HS2 corridors might be envisaged. The possibility of new link / relief roads to improve the functioning of the current network has been suggested, albeit in the context of a 11,500 home scheme."
- 20.13 Such a statement seems to be misguided in a number of respects, not least because the Meecebrook proposals will deliver just 3000 houses within the period covered by the local plan, i.e. 300 per year from 2030/31 until 2040, with the idea of the same level again between 2040 and 2050. Such a level of housing falls well-short of what would be required to justify major infrastructure investment such as a new M6 junction.
- 20.14 Furthermore, the reference to a bridge being required to cross the M6 and HS2 suggests that the authors believe that a new motorway junction with the A51 at Sandyford is realistic. However, this was the location for J14A that was presented in evidence by Stafford Borough Council to the HS2 Phase 2a Select Committee that was rejected on engineering and cost grounds.

21 Assessment of cumulative impacts

- 21.1 **We are concerned that no work has been done to assess the cumulative impact the proposed Meecebrook development and HS2 Phase 2a will have on residents of Yarnfield and Cold Meece.**
- 21.2 Residents of Yarnfield and Cold Meece parish will face disproportionate disruption over many years if HS2 Phase 2a goes ahead.

- 21.3 The parish council is already very concerned about the levels of HS2 HGV construction traffic that will completely isolate our community, disrupt our daily lives and blight our homes for many years.
- 21.4 Advance works relating to the realigned Yarnfield Lane, which would be undertaken to facilitate the proposed Stone Railhead and are scheduled to commence during 2023, will be followed by the construction of the HS2 mainline over a period of at least five years from early 2025. The construction of Meecebrook will overlap with these HS2 works in 2030 and then prolong the impacts on the inadequate local road network for a further 10 years, the effects of which will cumulatively affect traffic used by both residents, emergency services, public transport and employment sites.
- 21.5 A detailed and robust assessment of the cumulative effects of these projects is therefore required to determine whether the proposals are actually sustainable or not.

22 Employment

- 22.1 **We believe the Preferred Options proposal fails to take account of the impact that approved development opportunities at Raleigh Hall Industrial estate and the 85 acre Meaford Business Park will have on the viability of any employment land within the Meecebrook proposals.**
- 22.2 Paragraph 9.7.4 of the AECOM Sustainability appraisal states that “With regards to Meecebrook, there is general support for mixed use new communities, and there are reasons to suggest this is a strong location for employment growth, assuming significant transport infrastructure upgrades, including a train station and good links to the M6.”
- 22.3 Road and rail connectivity for the development of employment land on Meecebrook will be seriously compromised by the poor quality road network in the vicinity of the identified employment land areas.
- 22.4 From the consultation commentary outlined above, it is clear that the assumptions regarding significant transport infrastructure upgrades are highly optimistic and therefore potentially unlikely to happen. Accordingly, the anticipated employment growth at the business parks within Meecebrook is unlikely to be achieved and this will undermine the concept of a self-sustaining garden community.
- 22.5 The Meaford Business Park, with its established access to the A34 and M6 will proved to be a more commercially viable alternative.

23 Social Engineering

- 23.1 **We believe Meecebrook represents a massive degree of social engineering based on a desire to see a fundamental shift away from dependency on cars in a way that is unrealistic.**
- 23.2 “Meecebrook’s vision will be for a garden community that is sustainable in all forms by reducing carbon use and being a self-sufficient community” - but not how it will be achieved.
- 23.3 The phased approach to the development of the site, with the key infrastructure projects not appearing until later in the project, if at all, will inevitably force residents to look to neighbouring communities for support. No connections with either Yarnfield or Eccleshall that support safe walking or cycling, and a poor public transport network, have been provided beyond the footprint of the proposed development. This in turn will lead to residents having to use motor vehicles as their preferred means of transport.

24 Parish Council Boundary Review

- 24.1 **We believe that a parish boundary review will be needed to provide a connection between any housing development on the eastern side of the Meecebrook proposal to Yarnfield and Cold Meece.**
- 24.2 The area of land to the east of the proposed site is close to the existing community of Cold Meece and lies on the border between Yarnfield and Cold Meece Parish and Chebsey Parish. It is separated from the rest of the development land.
- 24.3 When this area is built on we strongly recommend that there are walking and cycling routes to link it with Yarnfield and Cold Meece and that logically it should form part of Cold Meece ward. In this way the developers could ensure that the new residents were physically and socially connected to the wider community.