

Via email to staffordstationgateway@cbre.com

28th September 2022

Stafford Station Gateway Strategic Regeneration Framework DRAFT June 2022 - Consultation Comments

SUMMARY

The Stafford Station Gateway Strategic Regeneration Framework (SRF) is an ambitious plan to redevelop an area of Stafford that has been under-used, where many areas have returned to nature. While it represents some bold ideas for new development, it will radically affect the existing green spaces.

Both Stafford Borough Council and Staffordshire County Council have this year signed Nature Recovery Declarations, committing to actions including protecting high-quality wildlife habitats, investing in nature-based solutions to climate change, and embedding nature's recovery into all strategic plans and policy areas. The SRF document is an ideal opportunity to put this into practice, which requires a robust evidence-base.

In order to deliver a net gain for biodiversity, and contribute positively to the district's Nature Recovery Network, we feel that further action is needed to identify and protect important wildlife features, deliver best practice in flood management, and maximise green infrastructure for people and wildlife.

We believe that new development in Stafford should be a sustainable exemplar, and that tackling the nature crisis, alongside climate change, will provide the best environment for our future well-being and prosperity.

The Stafford Station Gateway SRF would benefit from including the following:

1. **Biodiversity baseline** - obtaining up-to-date ecology information on designated sites, habitats and species relevant to the Gateway area, to identify and protect features of high environmental value.
2. **Biodiversity Net Gain** – carrying out a high-level assessment to demonstrate that a 10% measurable net gain for wildlife can be delivered by the project.
3. **Flooding and wetlands** - Ensuring the proposals meet local and national flood risk policy, flood management requirements and wetland restoration aspirations
4. **Accessible natural greenspace**- providing sufficient green infrastructure managed long-term, maintaining access routes and achieving Building with Nature Standards accreditation.
5. **Climate change**- Including specific quantifiable requirements for energy, water and carbon to comply with local and national policy for net zero development and climate change resilience.



Staffordshire
Wildlife Trust

The Wolseley Centre
Wolseley Bridge
Stafford
ST17 0WT
Tel: 01889 880100
info@staffs-wildlife.org.uk
www.staffs-wildlife.org.uk

Chairman

Richard Higgs

Chief Executive

Julian Woolford

Registered Charity No. 259558

Limited Company No. 959609

Registered Office: The Wolseley Centre

Wolseley Bridge, Stafford, ST17 0WT

Printed on recycled paper



Looking after **Staffordshire's Wildlife**



Registered with
**FUNDRAISING
REGULATOR**

1. Biodiversity Baseline

In order to comply with national guidance on biodiversity, such as allocating as with lower environmental value, it is essential to have an accurate baseline for the area's biodiversity. Without this it is difficult to demonstrate that the mitigation hierarchy has been followed; the first step required for delivering mandatory net biodiversity gain. Consideration of less damaging options is also a key stage in gaining any protected species licences in future. If important ecology features are identified early, potential constraints can be avoided and opportunities built-in, thereby smoothing the delivery of future phases.

We understand that ecology surveys have not yet been undertaken across the Gateway area. While the report describes known designated wildlife sites nearby and some greenspaces within the site, the presence of many semi-natural and priority habitats has not been fully recognised. The presence and impacts to protected and priority species is also unknown at this stage.

We advise that a Preliminary Ecological Assessment of the whole Gateway area should be undertaken, identifying any priority habitats and assessing high-value areas against the Staffordshire Local Wildlife Site criteria. This can then inform the final plan layout, retaining areas of importance and achieve the most effective green infrastructure provision.

Designated Wildlife Sites

Doxey and Tillington Marshes SSSI is nationally important for breeding and wintering birds, and its marshland vegetation. The majority of the site is managed by Staffordshire Wildlife Trust as a nature reserve, and is popular with visitors. The nearest part of the SSSI lies 30m to the north of the Gateway area, across the railway from the proposed Wicketgate/ Doxey Road character zone. While any impacts are likely to be indirect as the SSSI is upstream, these impacts must be considered by the SRF.

Firstly, the increase in residents and users of the new developments will result in a greater footfall on the nature reserve, as it is the closest large natural space for walking. Secondly, greater development near to the SSSI could increase lighting and disturbance to the southern edge. The SRF should consider how these impacts can be avoided and mitigated. Provision of a vegetation screen along the railway and good lighting design should be incorporated to reduce adjacent impacts. To absorb added visitor pressure, sufficient good quality natural greenspaces within the masterplan and improved access links, plus potentially a contribution towards the management of the SSSI, should all be considered.

Local Wildlife Sites (LWS) are non-statutory designated sites, representing the best habitats of county and district importance for wildlife. They form the 'backbone' of our ecological networks, supporting and linking national and internationally important sites. There are many habitats across Staffordshire that have yet to be assessed for



LWS status, and maintaining this evidence base in an ongoing task. As LWS are a material consideration in the planning process, it is important for strategic plans to identify and map any areas that may meet the criteria for designation. Suitable avoidance and mitigation can then be planned, which will minimise losses and retain the best features, benefiting the function of greenspaces as well as maintaining wildlife resources.

All semi-natural habitats within the Gateway area should be assessed against the LWS criteria. This would include all areas that have naturalised, such as the former cricket ground and rugby club sites, the balancing lake, and 'brownfield' habitats along the Doxey drain at the former Castleworks site and to the rear of the existing retail outlets adjacent to the station.

Priority Habitats and Species

Some of the semi-natural habitats within the Gateway area could also be classified as priority habitats listed in section 41 of the Natural Environment and Rural Communities Act 2006, which need to be identified and enhanced through plan making. Semi-natural broad-leaved woodland, wetlands, open mosaic habitats and lowland meadow habitats are all likely to be present within the site. The current biodiversity net gain metric requires that any priority habitats are retained where possible, and must be replaced like-for-like. These habitats tend to have a longer establishment time and higher risk related to their creation, so retention in situ is often easier.

A number of protected and priority species have been recorded on or near the area, which would need to be further investigated in order to preserve populations or mitigate for impacts. Mammals including badgers, bats and hedgehogs are likely to use the site, while otters present on the River Sow and Doxey Marshes may try to use the watercourse corridor if well-designed. Great crested newts are present in the vicinity, and several priority birds as well as a number of scarce invertebrates have been recorded on site. These species and their long-term conservation should form part of the Gateway design and vision. This will inform the type and location of habitats and corridors, as well as lighting and long-term management.

Wildlife Corridors

The SRF should identify wildlife corridors within the Gateway area, and has recognised the Doxey Drain as a key feature. There is a clear band of semi-natural habitats along the existing drain, linking the SSSI with the balancing lake, and stepping stones of habitat alongside these areas. Although the proposed restoration of the drain to a more natural shape is very much welcomed, the overall narrowing of the habitat corridor through the site and the increase in disturbance levels will reduce the habitat value, and impact on species ability to move through and use the site. Consideration should be given to retaining more mature vegetation along the drain corridor.



The habitat links along the former railway, now partly the Way for the Millennium, linking west to the Castle View park and Burleyfields Biodiversity Alert Site, have not been recognised. In the illustrative layout, new housing severs the remaining railway line and the habitat link to the west. More could be done to integrate this corridor into the design.

Dark corridors for bats and other nocturnal animals should also be a consideration, as development is likely to bring significant lighting of currently dark areas.

National Planning Policy Framework guidance-

175. Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework⁵⁸; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.

179. To protect and enhance biodiversity and geodiversity, plans should:

a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity⁶¹; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation⁶²; and

b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

62 Where areas that are part of the Nature Recovery Network are identified in plans, it may be appropriate to specify the types of development that may be suitable within them.

2. Biodiversity Net Gain (BNG)

While the SRF mentions biodiversity enhancement, there is no commitment to measureable net gain. By the time development commences, mandatory measurable BNG of 10% will be in force, and so the framework should ensure that this is deliverable within best practice. Off-site compensation is a last resort in the BNG process; therefore retention of the most valued ecology features at an early stage of masterplanning is a key step in demonstrating that the mitigation hierarchy has been followed.



The current proposed indicative masterplan involves an overall loss of green areas, many of which are of value to wildlife with some fairly mature vegetation. Proposed habitats are smaller in size and of unknown quality; this is likely to result in a net loss of biodiversity across the Gateway area. While a gain in river units would be provided, and probably hedgerow units, there would be significant loss of habitat units from the reduction in woodland, grassland and ruderal vegetation. The need to demonstrate avoidance of high-value habitats, and provide a net gain in all types of biodiversity units, could affect both the layout and also the amount of development achievable within the area.

The SRF should commit to achieving a net biodiversity gain of at least 10%, and adhering to the relevant best practice guidelines. It is therefore essential that the proposed masterplan complies with current and emerging standards, so that each phaset can provide BNG in its own right, or across the area as a whole.

Given the varied nature of the character zones and phasing plan, some areas will not meet this aim alone, and will require the site-wide greenspaces to provide a gain. It is unclear from the phasing proposals how the green infrastructure will be delivered- an Infrastructure Delivery Strategy is mentioned which includes the re-alignment of Doxey Drain/Brook through the area, implementation of the Flood Risk Strategy, and creation of new public realm/ greenspaces. The more habitat that can be created in advance of impact occurring, the better the proposals will score in any BNG assessment. Therefore we would support as much of this infrastructure being established in advance as possible.

We advise that an initial Biodiversity Impact Assessment, using latest Defra metric, is carried out to give an indication at this stage as to the balance for biodiversity, and to consider alternative options retaining larger areas of semi-natural habitat. After losses and impacts are minimised, it is likely that a remaining deficit will need to be compensated for by off-site offsetting. This will require identification of suitable areas, ideally nearby, where similar habitats can be enhanced or created. The feasibility and availability of offsets that meet the trading rules in the metric should be investigated at this stage, to ensure that requirements can be met.

3. Flooding and Wetlands

Hydrology

Much of the Gateway area is in flood zones 2 and 3, and water management is reflected as a key requirement within the draft SRF. Hydraulic modelling of the Doxey Drain has been undertaken, and a flood risk and drainage strategy will be undertaken. Recent developments upstream at Burleyfields include balancing features and will likely have changed the flood regime in the area to some degree. Having not seen the updated flood risk information, we are unable to comment on the compliance of the proposals with flood risk guidance, but feel that this should be established further before the final



concept is adopted, to ensure that the proposals are viable. The layout should avoid development in the floodplain in favour of restoring natural habitats that are more resilient to climate change.

The proposed de-culverting and naturalising of the Doxey Drain would enhance the quality of the channel and is welcomed. However, the amount of development proposed will both narrow the existing habitat corridor, and result in an overall increase in impermeable areas. It would therefore appear that a greater width of floodplain may be required than currently indicated.

The illustrative masterplan does not show the smaller tributaries that connect to the Doxey drain, that are partly in culvert and would also need to be restored. One of these runs from the west through Castle View Park, is piped underneath Reed Drive and the edge of former cricket pitch, emerging at the rear of Campion Grove to join the Doxey Drain. There are also small drains running north along both sides of the former rugby pitch and around the balancing lake. There are good opportunities to restore these watercourses within open spaces, and incorporate more flood storage. The former cricket pitch is known to be wet and regularly floods- this open space already supports wetland vegetation and will need to incorporate wetland areas to hold water. Access may be compromised in high rainfall events, so the use and design will need to reflect this, for example boardwalks could be required.

It is unclear where extra water storage will be created, apart from the brook course. Sustainable drainage systems require attenuation to be outside of the floodplain, which will be difficult to achieve within the site. Significant rainwater harvesting infrastructure, and green roofs should be included – this would also contribute to water efficiency and climate adaptation.

Given that most of the surface water flows into the Gateway area from outside, measures to slow and balance water volumes off-site, further up in the catchment, could be an effective approach. The Environment Agency flood maps indicate that surface water flows into the site from several directions- from the north, west, and south through the Doxey, Castlefields and Rowley Park areas. These are largely urban areas where the natural hydrology has been changed and where sustainable drainage and natural flood management might be beneficial. Linking with wider schemes tackling flooding across Stafford should be an aim within the SRF.

Local Plan Flood Policies

The Plan for Stafford Borough 2011- 2031 recognises flood risk as one of the key issues and challenges facing the area over the Plan period. It states: ‘Steering new

development away from areas prone to flooding, as well as implementing appropriate measures into new development, will reduce the impact of climate change.’ One of the key objectives for Stafford is: *4. Avoid development in flood risk areas.*



Policy STAFFORD 1 – STAFFORD TOWN states:

Promote Stafford's unique character and heritage by:

ii. Ensuring that development is not located in areas of flood risk or contribute to flooding elsewhere;

As the majority of the area is prone to flooding, the siting of some development in the current illustrative masterplan would appear to conflict with local policy.

The overarching policy for the wider strategic development location (POLICY STAFFORD 3 – WEST OF STAFFORD) includes 'A comprehensive drainage scheme will be delivered to enable development of the Strategic Development Location which will include measures to alleviate flooding downstream on Doxey

Brook and tributaries to the River Sow;' However, at this stage it is not clear whether the ongoing development to the west has reduced flood risk on the Gateway area, changed the extent of the floodplain, or that a drainage scheme will enable all parts of the area to be developed as shown on the masterplan.

Nature Recovery Network

A Nature Recovery Network report for Stafford Borough, produced in 2019, forms part of the evidence base for the local plan, and sets out habitat connectivity opportunity zones across the district. The Gateway area is, unsurprisingly, within the Wetland zone, as well as overlapping Urban Fabric zone on its edges.

This means the area has opportunities for:

- Wetland creation and enhancements, connected to other semi-natural habitat
- Natural Flood Management, river re-profiling/naturalisation, improving flood storage and habitat for species particularly waders/ wildfowl
- Using historic maps and flood models to restore wetland features
- Linked benefits- water quality, recreation and amenity, cultural heritage.
- Creation of diverse amenity grassland, road verges and hedgerows
- Sustainable drainage features such as rain gardens, green roofs and walls.
- Wildlife-friendly management of urban green spaces

The River Sow is highlighted as a priority within the wetland zone, particularly linking the wildlife sites along the catchment, including Doxey Marshes and through the urban area of Stafford. Ensuring that Doxey Marshes is protected from adverse impacts of development pressure is also a key point in the Urban Fabric area.

While the SRF contains positive words regarding blue infrastructure, sustainable drainage and brook restoration, it is not clear whether there will be an overall gain in wetland habitats post-development compared to the current site conditions.



Wetlands, water and green urban spaces are essential to the area's identity and vision; not only for wildlife, but for effective water management, quality amenity spaces and

access. This is included strongly in the SRF, but the practical details of just how much space is needed for water, and where, could impact the layout and amount of development achievable. Overall, we feel that more space for water is likely to be required within the area. How the location functions within the wider river catchment will also be vital to the success of the Gateway area, and needs to be fully understood at this stage.

4. Accessible natural greenspace

Green infrastructure (GI)

The Gateway area at present supports a number of green areas, many of which are unofficially accessible to the public, but are not as usable as they could be due to lack of management and adequate paths. Never the less, they provide a large area of green space that can be enjoyed from existing footpaths and roads, along with the wildlife that it attracts.

Paragraph 7.7 of the Plan for Stafford Borough 2011- 2031 recognises the pressures of new development in Stafford and the need for additional GI:

'National planning policy set out in the National Planning Policy Framework highlights the importance of Green Infrastructure (GI). The scale of growth at Stafford town will increase pressure on local GI assets, which could impact on the town's biodiversity and landscape character. As part of the Green Infrastructure Strategy, two key proposals are recommended for Stafford town to increase biodiversity, recreational opportunities and provide flood protection benefits: creation of the Penk & Sow Natural Parkland; and enlarging Stafford Common into a community park, as illustrated on the map below, and defined on the Policies Map. To support GI, no development is proposed in the flood plain areas of Stafford...'

The proposed new public parklands have not been progressed, therefore more pressure will be felt by existing open spaces. The SRF should refer to and include aspirations from the Green Infrastructure Strategy (2009) and Green Infrastructure Delivery Plan (2013), for example to manage areas around Doxey Marshes to absorb visitor pressure on the reserve, and to 'protect and enhance hedge-lines and woodland in Doxey and the Stafford Castle area to maintain landscape character and connectivity for wildlife'.



.POLICY STAFFORD 3 – WEST OF STAFFORD states:

Development must deliver the following key requirements:

xi. Provision of a network of multi-functional green infrastructure taking into account existing on-site features, such as hedgerows, tree lines, drainage ditches, archaeological remains, culverted watercourses traversing the site and Public Rights of Way with play areas and green corridors allowing wildlife movement and access to open space;

The proposed masterplan provides better access to some areas, but an overall loss of green space, and a reduction in the naturalness and peacefulness of key features such as the balancing lake and the Doxey Drain. Overall tree cover would be reduced with the loss of mature semi-natural woodland areas. This, coupled with the greater number of residents and site users, will put added pressure on the remaining green areas. The improved access to existing inaccessible areas, such as the former cricket pitch and to the Doxey Drain, may balance the needs of local residents, but those areas will not be able to support wildlife in the same way once they are open to use by people. Keeping some areas secluded whilst enabling the landscape to be enjoyed, would better preserve naturalness and tranquillity within the area. This could link well with retaining the highest value biodiversity features.

The proposed routes for pedestrians and cyclists do not seem to link to the Way for the Millennium to the west– this would be a good enhancement opportunity. It is not clear how public footpath 40 and its current natural character would be maintained within the masterplan.

Opportunities for natural play and multi-generational use of natural areas should be integral to the design of public spaces. Safe access to water through view points, dipping platforms, shingle beaches, welly fords and stepping stones across wetlands and watercourses could all be included. Natural play features such as logs, earth mounds, wooded areas and wildflower mazes would all be positive additions. Community growing areas such as orchard tree planting and allotment plots should also be considered.

The ongoing management of green spaces and habitats for the long-term is essential to achieving BNG and also with engaging the local community in the spaces. There is perhaps potential to designate a new Local Nature Reserve as part of the scheme, as well as support community groups and activities.



Building With Nature Standards

<https://www.buildingwithnature.org.uk/>

The Building with Nature Standards are the UK's first green infrastructure benchmark, putting nature at the heart of development for people and wildlife. The accreditation framework shows 'what good looks like' at each stage of the development process, and provides evidence-based, 'how-to' guidance on delivering high-quality green infrastructure.

Staffordshire County Council has a history of delivering large development sites with high quality green infrastructure, such as I54 in South Staffordshire, Kingswood Lakeside near Cannock, and Redhill Business Park just north of Stafford- which was shortlisted for a national biodiversity best practice award. The usual practice is for the local authority to create, own and manage the main green infrastructure in advance and for the long-term, and for developers to then develop plots in line with an overall masterplan. This may not be possible for the Gateway area, but would be an ideal approach. It is not clear at present how the phased development would deliver joined-up green infrastructure and flood management in advance of new development pressures.

We feel that it would be very valuable for the Stafford Railway Gateway SRF to achieve a Building with Nature award for policy, along with a commitment from partners that subsequent design, and development phases will all achieve this standard. As well as the kudos it would attract, the process and learning would help tackle the challenges and opportunities of this unique urban area.

5. Climate change

The current local plan requires all new residential development to achieve zero carbon development, through energy efficiency, reduced water consumption, orientation to maximise solar gain, recycling and sustainable materials. All non-residential development up to 1,000 m² will be expected to have a BREEAM Very Good rating, and over this size, a BREEAM Excellent rating. All new developments will be required to generate a proportion of their energy requirement from on-site renewable resources or low carbon energy equipment, or, if not viable, off-site energy generation.



Stafford Borough's Climate Change and Green Recovery Strategy (2020-40) deals mainly with the council's own operations, but states that the council will 'Facilitate development that is resilient to climate change'. It is not clear how this will be actioned or measured, or how this would apply to the Gateway area. Similarly, Staffordshire County Council's Climate Change Action Plan (2021) deals with the authority's own operations but also includes actions to agree a consistent approach to EV infrastructure across Staffordshire, outline options for sequestration and/or offset projects, and determine the current sequestration / storage of carbon in natural habitats on SCC landholdings and the potential to increase it through tree planting and habitat enhancement.

The SRF focusses on the transport benefits of the Gateway area, but has yet to prove that biodiversity will be increased or that flooding can be addressed. A net loss of green areas and mature trees, plus an increase in built development and resource use, would appear to be difficult to balance. Wetlands do present carbon sequestration opportunities, but how large a role these could play is not quantified. It is not clear how net zero carbon emissions will be measured or monitored.

The masterplan does not show all buildings orientated for solar gain, set out the type of renewable energy sources feasible on the site, or commit to achieving BREEAM standards. EV charging infrastructure is not mentioned. Carbon accounting should be used to assess the initial design to ensure that zero carbon can be achieved.

Overall, the SRF highlights opportunities for sustainable development, but would benefit from setting out specific quantifiable requirements, actions and or targets in line with current policy.

Regards,



Kate Dewey BSc (Hons) MCIEEM

Senior Planning Officer

