SKDC Site Allocation and Policies DPD - Post Main Modification Hearing
Ref - Land Adjacent to Kettering Road, Stamford (STM1a)

Additional Submission to the Inspector on behalf of John and Jo Burton
made by representatives appointed at their request

Background

This paper is additional to submissions made to SKDC by John and Jo Burton on November 3rd 2011 and August 12th 2013 regarding the Local Development Framework for the area and their objection to any development on the two fields designated STM1a.

It’s purpose is to draw upon information not known or in the public domain at the time of Mr Burtons’ previous submissions and principally concerns itself with the following areas

1) Effect on highways and traffic
2) The questionable need for the development of STM1a based upon SKDC housing supply requirements
3) The unsuitability of site STM1a for development
4) Public Opinion

1) Effects on Highways and Traffic

The site in question (STM1a) lies to the south of the busy A43 trunkroad as it enters Stamford and where it joins High Street St Martins, Wothorpe Road and Barnack Road.

It is also directly opposite STM1d (the Stamford Town Football Club site) which has already been granted permission for the building of 54 houses and which also adjoins the A43.

These points were adequately made in Mr Burtons previous submission but subsequent to that we have become aware of feedback from Lincolnshire County Council Highways to SKDC (given on 19th October 2012) which suggest a preference by Highways to keep the number of developments directly served by new junctions off principal roads be kept to a minimum. Mr Burton requests that this feedback and the views of Highways be taken into account in the light of the possibility of STM1a and STM1d being granted permission for development.

In addition we have been made aware that on August 13th 2013 Stamford Town Council as part of the DPD Consultation said, in relation to the enlargement of STM1a, that it “objects strongly to this increase because of the additional amount of traffic it will result along an already busy road, particularly at peak times. The Town Council believes that a 40% increase in housing, and therefore traffic, is unacceptable in this town centre site.
Lastly with regard to highways impact, we draw the Inspector’s attention to Traffic Flow modelling undertaken for LCC Highways by Jacobs and reported on in January 2010. This modelled a number of development scenarios and projected them forward to 2026 taking into account the fact that no major infrastructure development work was planned for Stamford. This concluded that at the base point for the modelling (2009) the Town Bridge and High Street St Martins “exceed limitations” in terms of traffic flow. The modelling then looked at various development scenarios and considered traffic flow impact on a number of other roads and road junctions and not surprisingly concludes that Town Bridge and High Street St Martins still “exceeds limitations.” Importantly this modelling so far as can be established did not include development of STM1a.

Whilst neither Mr Burton nor his representatives are highways engineers it seems clear that further traffic flow modelling is essential prior to the sanctioning of any development which adds to the traffic burden on Kettering Road, High Street St Martins, Barnack Road and Wothorpe Road in order to avoid further exacerbating an already over stretched roads infrastructure.

2) The questionable need for the development of STM1a based upon SKDC housing supply requirements

Under South Kesteven Districts Council’s Core Strategy there is a requirement for Stamford to make provision for the development of 1140 new homes and 24 ha of additional employment land in Stamford in the period 2006 to 2026.

However, according to published data from the July 2013 SKDC Schedule of Modifications to the Site Allocation and Policies Plan Document (Appendix 1 [PHMM07]) some 560 houses were built in Stamford between 2006 and 2013 with a further 173 having been granted planning permission including the Stamford Football Club Development.

Just last week, planning permission was granted for a site on Tinwell Road, Stamford for 430 homes which in fact means that the housing supply to 2026 has already been met and exceeded and the requirement to build on the unsuitable STM1a is questionable in supply terms given the other options available to SKDC.

We therefore question the requirement for housing on purely supply terms STM1a and suggest that the following sites would be far more suited -

- STM 16 - 26.77 ha. Land east of Ryhall Road.

The development of the new football stadium and sports facilities on the opposite side of the road to this site make it a very attractive opportunity as there will be extensive road improvements carried out before the facilities can be opened.
• STM 06 – 0.32 ha. Sharmans Depot on Barnack Road

A brown field site surrounded predominantly by housing and currently used as a dealership for heavy agricultural machinery.

3) The unsuitability of site STM1a for development

We would like to draw the Inspector’s attention to a number of documents which suggest that STM1a does not represent a suitable location for development.

i. The Stamford Town Council Town Plan - 2013-2026

This identified the Easton on the Hill Direction and Town Centre locations were among the least preferred directions for development.

STM1a falls into both these areas.

ii. South Kesteven Landscape Character Assessment

This document helps to identify those areas of South Kesteven considered to be most appropriate for development from a landscape perspective. Section 4 covers the Kesteven Uplands Area in which Stamford is located and we would draw the inspectors attention to 4.34 which sets out the landscape management objectives for this area, highlighting those objectives most pertinent to STM1a.

- Maintain important grassland areas
- Maintain traditional village forms
- Pay special attention to sensitive spaces around the edge of historic towns such as Stamford and the villages
- Maintain open areas that extend into the towns and villages

STM1a falls into all these categories

We also draw the inspectors attention to 4.30 part of which, referring to Stamford says “Views towards the town centre and church spires and towers should be protected” (See attached photograph)

iii. Stamford Conservation Area

Stamford was the first town in the country to create a conservation area in 1967 and it has this to thank for the fact that over the following 46 years much of it’s historical architectural heritage has been retained.

The boundaries of the Stamford Conservation area has recently been extended and the so STM1a now finds itself at the very edge of the conservation boundary.
We would argue strongly that this makes it unsuitable for development and that if planning consent is ultimately granted then STM1a also be added to the Conservation Area.

iv. **Stamford Town Council Response to Consultation on SKDC LDF Modifications**

The Town Council have made it clear that they do not wish to see the scale of development proposed in Stamford and particularly do not support the loss of Greenfield agricultural land to development. However, they also recognise that the town needs to develop in order to continue to prosper. The difficulty of deciding how to accommodate housing development in Stamford was reflected by the Town Council when it met Council officers in July 2013. The Town Council agrees that it would be more appropriate to provide the housing allocation in a single urban extension rather than allowing multiple sites to be added. Specifically they have raised concerns about a number of the smaller sites within the town which they consider are not suitable for housing development. They have, however, agreed with the assessment of the three large urban extension sites and conclude that the site to the west of the town would be the better site to allocate, as long as it included major infrastructure and commercial employment land provision.

v. **Screening Opinion**

Subsequent to Mr Burton’s previous submissions, Kier Homes has asked for a screening opinion for STM1a. The conclusion of this, by the SKDC Development Management Service Manager was that AN ENVIRONMENTAL IMPACT ASSESSMENT IS NOT REQUIRED. We were surprised by this given the detailed response from SKDC (dated 10 September 2013) from which the following is an extract -

““It is considered that the impacts of the development will be limited to Stamford and the immediate surrounding area and as such it is considered that the development is only of local importance. The site is not located within an area considered to be particularly environmentally sensitive and the development does not generate any particularly complex or potentially hazardous environmental effects…….The site is located close to the Historic Park and Garden and listed building of Burghley House and other listed buildings and the Stamford Conservation Area and Wothorpe Conservation Area (Peterborough City). It is however considered that given the scale of the development a full Environmental Impact Assessment is not required…..The greatest impact from the development will be that of potential traffic generation and vehicular movements but given the sites location and the existing infrastructure and limited number of dwellings it is considered that this will not result in any serious increase in traffic to the extent that an environmental Statement should be required.””
Whilst the Screening Opinion concludes that no environmental impact assessment is required the detailed justification seems then to go on to contradict itself and to outline a host of reasons why such an assessment should be undertaken.

On Mr Burton’s behalf we would like to request that this ruling be reconsidered.

4) Public Opinion

A campaigning group, “Stamford! Protect our Green Spaces” has recently been established with the express intent of stopping the development of STM1a and to November 21st has gathered 535 signatures on an online petition.

By the hearing on December 10th it is expected that this number will be in excess of 1000.

STM1a is part of an iconic view of Stamford loved for centuries by the people of Stamford and its many visitors. This outcry of public opinion represents a concern both at the loss of this beautiful green belt land and the amenity benefits it provides but also about the highways and infrastructure impacts which it’s development could cause.

We hope that the inspector will take this public opinion into account.

Written by David Taylor and Paul Rose 
on behalf of John and Jo Burton

November 21st 2013
STM1a - Field pictured furthest from camera