Local Plan for South Kesteven

Site Allocation and Policies Development Plan

Session 4 – Stamford – Policy STM1e, STM2c and STM3

Friday 9th November 2012
Key Issue 1: Policies STM1e, STM2c and STM3

1.1 Detail of policies

• Should the STM2c entries be changed to provide greater flexibility? 229, MM72

1.1.1 The Council agrees that the plan should be consistent and that the reference to 14ha of employment development on the allocated site should be the same in both Policies STM2c and STM3. Originally the reference in STM3 said “up to 14 ha” and a minor modification was proposed to remove the “up to” to bring policy STM3 in line with policy STM2c [SAPMC015, SAP13]. However, it has become apparent through the detailed work undertaken by the developer/site promoter through the preparation of their outline planning application that achieving this amount of employment land on the site is unlikely. This is because of the need to achieve a better balance of uses on the site to achieve a high quality design and layout, together with more detailed consideration of the land take for open space, structural landscaping, SUDs, roads, housing, and community infrastructure and also taking into account the results of community feedback.

1.1.2 The Council, therefore, considers that using the phrase “up to” in both Policies STM2c and STM3 is appropriate and should be retained. This will allow for some flexibility in the overall design and layout of a scheme on the site, subject to the applicant demonstrating that reducing the supply of employment land on the site will not have a detrimental impact on employment land supply in the town as a whole.

• Should the STM3 entries include mention of sustainable transport,’rat-running’, pedestrian and cycle access, etc? 230, 238

1.1.3 An outline planning application has been submitted for the site. The application reserves all matters “except for access into the site for vehicles in terms of the positioning and treatment to the access of the site, but specifically excludes accessibility within the site, in terms of positioning and treatment of access and circulation routes and how these fit into the surrounding access network”. Highway issues relating to the application are currently the subject of discussion between the applicant and LCC as the Highway Authority.

1.1.4 The Council and the highway authority are concerned that in the interest of good planning, access through the site is essential. It is agreed that the route should not be designed to encourage rat-running, or (in view of the sites location between two junctions of the A1) as a short-cut or diversion should the A1 be closed. Equally it would be inappropriate to force residents in one half of the site to “rat-run” through the existing residential road network of Lonsdale Road and Hambleton Road, or onto the A1,
because they cannot easily access the other side of the development. It is recognised, however, that the wording in the policy is quite blunt and could be amended to more accurately reflect the requirement to ensure maximum access within the site for residents and visitors, whilst minimising the potential for the route to be used as a short-cut.

1.1.4 The requirement for pedestrian and cycle access from and within the site is considered a minimum requirement for a major mixed use scheme in an edge of town location. This will ensure that appropriate provision is made by the development to promote a more sustainable travel pattern for residents and users of the site. However, the suggested wording (SASub238) would make little practical difference to the intention of the policy and could be made as a minor change (note: should this change be made the revised words should also be included in policy DE3 to ensure consistency).

- **Should the STM3 entries include additional detail to justify major, mixed-use developments? 233**

1.1.5 The Council believes that this would be unnecessary additional text which adds nothing of substance to the policy and plan. All of these issues are contained within the relevant background evidence reports, it is unnecessary to repeat them in the plan.

- **Should the STM3 entries include mention of landscape corridors? 234**

1.1.6 The concern of existing residents in the Lonsdale Road area to the east of the proposed allocation about the impact of development of the site upon their outlook and the approach to Stamford, led to the incorporation of this requirement in the policy. It is considered that the requirement is important to ensure that the new development blends with existing. The policy wording is sufficiently flexible to allow the masterplan and development of the site to incorporate a number of different forms and types of landscaping to soften the edge of development and allow it to blend with existing development.

- **Does Policy STM3 deal adequately with issues of sustainable design and construction? 241**

1.1.7 Yes, together with CS Policy EN4 the policy will ensure that development on site is provided in a sustainable manner whilst allowing for flexibility in the design and layout to achieve a high level of sustainable development. However the proposed wording included in representation SASub241 would be acceptable as a minor change to the policy if it was felt that these words better explain the requirement (note: should this change be made the revised words should also be included in Policy DE3 to ensure consistency)
• Are the Policy STM3 requirements regarding affordable homes in line with Core Strategy requirements? 236

1.1.8 Agree with the representation. CS Policy H3 requires “up to” 35% of housing on development sites as affordable housing. Therefore, if the site capacity is 400 the affordable housing requirement would be 140. The phrase “at least” in the policy is therefore incorrect. However, the site would be expected to deliver the full 35% requirement and the inclusion of this percentage rather than a target in Policy STM3 may be a better way to ensure appropriate provision of affordable housing on the site (note: should this change be made the revised words should also be included in Policy DE3 to ensure consistency).

Policies STM1e, STM2c and STM3 – site characteristics

1.2 Why are the Policy STM1e, STM2c and STM3 sites the most suitable to deliver Stamford’s requirements for housing and employment land? 98, 44, 164, 222, 244, 247

1.2.1 Development opportunities in Stamford are limited. Development in the town is constrained by the presence of the district and county boundary with Rutland to the north and east and Northamptonshire and Cambridgeshire (and Peterborough City) to the south. The town sits within the attractive undulating landscape identified as the Kesteven Uplands and is an attractive and important historic market town with a large number of historic buildings, many of which are listed. To the south of the town (in Cambridgeshire) is Burghley House and Park, a Grade I listed building and Grade II* Registered Park and Garden, an additional constraint to expansion of the town to the south.

1.2.2 The quantum of housing and employment development required by the CS for the plan period cannot be met through the development of brownfield and infill sites alone. This fact was recognised by the CS Inspector [para 3.56 of the Inspectors Report, SK14]. Three potential directions for growth on the edge of the town were identified (north, east and west) and a process of site assessment and the consideration of specialist reports was followed to determine which was the best area of land to meet the development needs of the town to 2026.

1.2.3 Three areas of land were actively promoted to the Council for development on the edge of Stamford; land to the north, east and west of the town. Each area was considered by the Council as a potential urban extension site to meet the majority of the towns housing and employment needs. Each site was subject to public consultation and has been assessed using a standard set of criteria prescribed by the Core Strategy and the Sustainability Appraisal. The assessment also used evidence contained within a number of background evidence reports and studies, including the Stamford Traffic Model Report [SAP16] and the Landscape Capacity and Sensitivity Study [SK30] which were commissioned to assist the process of determining which extension area would have the least impact on these sensitive issues.

1.2.4 In addition to these studies officers have worked closely with statutory service providers such as the Highways Agency; Lincolnshire County Council (as highway authority, education authority, providers of social services) GPs and medical centres; Anglian Water; Internal Drainage Boards; The Environment Agency; Natural England and English Heritage.
1.2.5 Good quality, attractive and available employment land has been in short supply in Stamford for a number of years, despite Local Plan allocations which have remained undeveloped. The site assessment process and the assessment of employment sites undertaken by NLP [SK26 South Kesteven Employment Land Capacity Study] revealed few new suitable employment sites and an assessment of the existing Local Plan allocations concluded that few were suitable or attractive to the market and were, therefore, less suitable to retain as employment allocations. It was apparent, therefore, that as well as the majority of housing land required for the town, the majority of additional employment land would also need to be found as an urban extension site. In selecting sites for employment allocation the attractiveness of the land to the investment market would be a key factor: this also means that the proximity of a site to the strategic highway network was a key consideration. The NLP study identifies the general requirements and key issues relating to the successful selection of employment land and specifically assessed some sites. Whilst the study considered parts of the urban extension areas to the east and west of the town, it did not specifically consider and score the whole of all three areas. However, the principles behind the scoring and ranking of sites are clearly set out in the report and were used to help assess the suitability of each proposed extension area for employment uses.

1.2.6 The allocated site performs the best of the three proposed growth areas in the Stamford Traffic Model report [SAP16]. It is assessed as being equally sensitive to development as the site in Rutland in the Landscape Capacity and Sensitivity study [pages 25 – 52 SK30], both of which are less sensitive to development than the majority of the land to the east of the town. It also performs the best of the three areas for employment development, because of its proximity to the A1 and junctions off the A1, which make it a prominent and attractive location for business development. It also scores as the highest of the sites considered in Stamford in the NLP study. The site comprises a large intensively farmed field with a few mature trees to the northern and southern boundary. The site has direct access to the town centre with bus stops located on Empingham Road, Tinwell Road and Hambleton Road which provide the opportunity to extend existing bus provision into the site. It is in close proximity to the local primary school which has the ability to expand to accommodate additional pupils. The provision of open space, play space and a local centre as part of the development will help to achieve a better balance of local services and facilities in this part of the town, which has a number of large residential estates with very limited local facilities.

1.2.7 None of the three extension areas assessed were considered to be easy solutions. Consideration was therefore given to both the ability of each area to deliver the required development, as well as the suitability of each area for development. As a result of the assessment process and the consideration of background evidence the land to the west of the town off Empingham Road (and proposed for allocated as STM3) was assessed to be the least worst of the three areas in terms of its impact on landscape, traffic, flood risk and biodiversity. Evidence also indicated that the site was most suitable for employment development and would, therefore, be attractive to the investment market. Development of this site would require little additional off site infrastructure other than that required to service the site, making it a deliverable and viable site for a mixed use scheme. The site has been promoted by both the land owner and a developer, who have invested in their own body of evidence which adds to and is largely in agreement with that prepared by and on behalf of the Council. This evidence demonstrates the availability and deliverability of a mixed use scheme on site within the plan period. Since the Submission plan was published an outline planning application has been submitted for the site. The application demonstrates that development is deliverable and viable and could commence in advance of the phasing indicated in the plan. It is expected that
development of both the housing and employment elements will be achieved within the plan period.

1.2.8 Stamford Town Council have been involved throughout the assessment and decision making process. Whilst 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, they do recognised that the town needs to develop in order to continue to prosper. Following a series of meetings the Town Council concluded that it would be more appropriate to provide the housing and employment development in a single urban extension rather than allowing multiple sites to be added. They have also concluded that the site to the west of the town would be the best site to allocate, provided that it includes the necessary infrastructure and employment land provision. (See minutes of Town Council Meeting attached at Appendix 1)

1.2.9 Appendix 2 to this statement is a response prepared by Mouchel (on behalf of LCC) to evidence submitted with the representation by SCOT (SASub100) about the Traffic Model for Stamford.

1.2.10 Appendix 3 to this statement is a response from Bayou Bluenvironment to evidence submitted about the Landscape Character and Sensitivity Report with the representation made by SCOT to sites allocated in Stamford (SASub100).

1.3 Do the Policy STM1e, STM2c and STM3 sites accord with National Planning Policy Framework guidance? NPPF9

1.3.1 Yes. Having assessed the alternative options the allocated site is considered to be the most sustainable solution to the identification of sufficient land for housing and employment development for the town for the plan period.

1.3.2 The allocated site will have the least impact on landscape and biodiversity, it is well located to existing public transport routes, the facilities provided in and around the town centre and a primary school. It will provide employment opportunities and additional local facilities as well as have the potential to improve walking, cycling and bus provision to serve a much wider residential area, enhancing the sustainability of this part of the town. The site is attractive to the housing and employment market, it requires minimal strategic infrastructure provision and is available and deliverable. It therefore contributes to the aspirations of the Framework in respect of providing for a rolling five year supply of deliverable housing land and planning proactively to meet the development needs of businesses to support a strong economy.

1.3.3. The allocation therefore recognises all three strands of sustainable development specifically identified in paragraph 7 but also throughout the Framework.

1.4 Are constraints to water infrastructure properly identified in Policy STM3 and are they properly addressed through the site selection process? 240, 247, 248, 249, 250, 251, 253, 254

1.4.1 The water infrastructure issues identified in the plan appear to have been largely resolved by the completion of the UPM which indicates that the level of development proposed for the town can be accommodated within the existing water and sewerage
network. Anglian Water and the Environment Agency have prepared a joint statement which is to be submitted to the examination. This will update and confirm the situation with regard to water infrastructure in Stamford. The wording of paragraph 3.1.14 (as modified by SAPMM012, SAP11) and 5.2.9 (as modified by SAPMM046, SAP11) may therefore need further updating.

1.5 Does the phasing of the Policy STM1e, STM2c and STM3 sites properly reflect the constraints imposed by drainage? 252, 255, MM69, MM75

1.5.1 See above in relation to the water infrastructure. However it must also be noted that the phasing strategy also considers the supply of housing land and delivery across the whole plan period.

1.5.2 The matter of how phasing was determined has been addressed by the council in response to Issue 3 of Session 2. In the case of Stamford the CS requires 1140 homes to be built between 2006-2026 some 480 had been built between 2006 and 2012 leaving a residual requirement of 660. This gives an annual average requirement of 47 homes to be built in Stamford each year for the remaining 14 years. At 1st April 2012 sites with planning permission in Stamford could provide 190 homes – about 4 years supply. It was therefore decided that only a small number of additional homes needed to be allocated to the first phase of the plan period to maintain a five year supply. Two sites with a combined capacity of 60 homes have been allocated to this first phase to ensure there is sufficient supply in the early plan period, the majority of new allocations are phased to the last two phases to ensure there is a consistent supply of housing land across the remaining plan period. Whilst it is not the Council’s intention to stifle supply it is appropriate to ensure that supply is properly phased to allow for delivery in the later phases as well as in the early part of the plan period.

Key issue 2: Alternative Stamford sites

2.1 Newstead site 97
   o Core Strategy consideration of site
   o Ring Road 100, 164

2.1.1 A total area of just over 91 ha of land to the east of Stamford (known as Newstead) was promoted through the preparation of the CS and was considered by the Inspector at the CS examination as an additional SUE (in addition to the two SUEs included in the CS at Grantham). Paragraphs 3.55 – 3.60 of the Inspectors report [SK15] conclude that the scale of development proposed by the Newstead scheme would meet the whole housing target for the town and that in view of the range of potential sites in and around the town it might not be the most appropriate or sustainable option and that it should not be identified as a strategic location for development in the CS.

2.1.2 The assessment of options for housing and employment development in Stamford concluded that land to the east of the town at Newstead performs less well on a number of issues. In particular, its impact on traffic congestion within the town [using the Stamford traffic model, SAP16] and its impact on the landscape and sensitivity to development [using the Landscape Sensitivity and Capacity Study SK30]. It also has the River Gwash running through it and land on each side of the river in the southern part of the site is identified as being at high risk of flooding (Flood Zone 3), some of which is also identified as functional flood plain [Map 10 SFRA Level 1 2009 SK36 and paragraph 4.1.1 and Maps 26 and 30 SFRA level 2 SK37]. The SFRA Level 2 [SK37] also identifies the whole length of the river corridor through the land to the east of the town as at risk.
from surface water flooding [map 29 SK37]. Land to the east of the town scored lower for employment development in terms of attractiveness to the employment market because of poor access to the local and strategic highway network and a lack of prominence from the A1 [SK26]. English Heritage (SASub 57) also raised “significant concerns regarding impacts on the setting of key historic assets, including the Grade I listed Burghley House, the Grade II* registered Burghley Park and Stamford Town Centre Conservation Area as well as the impact on the wider surrounding landscape” in relation to sites STAM14-17.

2.1.3 The whole area of the Newstead site considered is much larger than the other two areas. It could provide in excess of 1000 homes as well as employment land. To access the site, however, a link road connecting Uffington Road with Ryhall Road would be required. This view has been reiterated by the County Highways in its emailed comments received by the council on 18th October and appended to the Council’s statement for Session 8. It was suggested that this link road would form the first phase of a relief road. However, the length of road required to access the Newstead site would require a substantial amount of development to fund it. Evidence considered by the Core Strategy Examination in respect of the provision of a relief road in Stamford (paragraph 3.28 of the Inspectors Report SK15) clearly indicates that to provide the relief road, in excess of the residual 660 homes needed in the plan period would need to be provided to make the road provision viable.

2.1.4 Four individual parcels within the Newstead area were also examined and assessed on an individual basis by the Council (site references STAM14; STAM15; STAM16 and STAM17). However, the Highway Authority have been consistent in their view that access to these separate parcels would be a significant constraint and that the sites should only be developed as a comprehensive package which would provide the link road. Without this access to sites would be severely limited, significantly reducing the overall capacity of each site and thus impacting on deliverability and viability. Individually the parcels are subject to a number of constraints which add to the unsuitability of the sites for development on an individual basis [see assessment summaries for sites referenced STAM14, 15, 16 and 17 in Evidence Document, SK19].

2.1.5 The matter of a relief road for Stamford was considered in detail at the Core Strategy Examination. The Inspector concluded in her report [SK15 paras 3.26 – 3.29] that:

“Despite the work done on behalf of SCOT therefore, it does not appear to me that there is yet agreement by transport providers that a Relief Road or Ring Road is indeed an appropriate or deliverable solution to Stamford’s traffic problems.”

2.1.6 There has been no change in the Council’s position on this matter since it was considered by the Inspector at the CS Examination. In preparing the SAP DPD the Council has endeavored to meet the requirements of the paragraph 3.3.7 of the Core Strategy. It has worked with the County Council Highways team to identify appropriate scenarios for consideration by the Traffic Model report, and throughout the site assessment process it has engaged with and sought the comments of the Highway authority. The selection of the preferred allocation at STM3 gives considerable weight to this work. Consideration of a relief road or by-pass for the town has been incorporated into this work, particularly in relation to the assessment of the land to the east of the town (at Newstead).

2.2 Site ADD41 Priory Road, Stamford 57, 157
2.2.1 The Evidence Document [SK19] summarises the assessment of this site (referenced as ADD41). It was considered that the site might be suitable for a small development on part of the site which avoided the flood zone, provided that it was confirmed by English Heritage that development would not negatively impact on the Scheduled Monument of St Leonard’s Priory. English Heritage confirmed prior to the Cabinet meeting on 1st August 2011, when decisions on the allocation of sites for inclusion in the Submission Plan were made, that as the site had not been de-scheduled and that no application had been made for de-scheduling, they would, therefore, object to the allocation of the site.

2.2.2 Since then an application has been made by the landowner to English Heritage to de-schedule the site. The Council received English Heritage’s Notification Report dated 16th October 2012 which confirms that the area requested for allocation (as ADD41) has not been removed from the scheduled area of the Ruins and Site of St Leonard’s Priory. However, the scheduled area has been extended to include previously unscheduled parts of the priory precinct, these additional areas that now form part of the designation are:-

- Boundary wall to the north
- South west corner of the site
- Land between Priory House and the boundary with the allotments to the east

2.2.3 The inclusion of the additional areas is because they are considered to be “of national importance, forming a significant part of the priory precinct and retaining the potential for surviving features or archaeological material relating to the life of the priory and to the post-dissolution management of the site”. Allocation of the site would therefore be inappropriate and contrary to paragraph 133 of the Framework.

2.3 Site RUT1 199, 200, MM66, NPPF11

2.3.1 RUT1 lies wholly within the administrative boundary of Rutland CC to the north of Stamford. SKDC would not be able to allocate the site in the DPD as it lies outside of the authority’s area. However, it is recognised by both SKDC and Rutland County Council (RCC) that if this site were considered the best option for allocation to meet the development needs of Stamford, the Council would work together with RCC to prepare a separate joint development plan. There is no provision within the Rutland Core Strategy to accommodate a large amount of housing or employment development on its boundary with Stamford. RCC has submitted a statement to the examination explain the status and progress with their development plan and the consideration of the site by both authorities, particularly in relation to the duty to co-operate.

2.3.2 The site comprises just over 26 ha and was initially promoted for housing development to RCC through the SHLAA [SK22 and SK23]. The site was assessed by SKDC using the criteria of the CS and the SEA as potentially suitable for residential or employment development (or a mix of uses) but concerns were identified about the impact of development of this scale in this location on the highway network in Stamford and Rutland and the impact the development would have on the services and amenities of the residents of Stamford. When comparing the assessment of the three areas for an urban extension for Stamford, it was concluded that this site did not perform quite as well as the proposed allocation, particularly in respect of its attractiveness to the employment market because of poorer access to the local and strategic highway network and a lack of prominence from the A1. The impact of a large mixed use development in this location on the local road network and on local service provision was also of concern.
2.4 Site STAM14 224, 255,

2.4.1 This site forms one of the four parcels of land considered jointly as an urban extension to the east of Stamford (Newstead – see paras 2.1.1 to 2.1.6 above). The site forms the southern part of a larger area of land which was allocated for employment development in the adopted South Kesteven Local Plan (1995) [Policy E2.3, SK1]. With the exception of a potato store on the southern edge of the site no development or planning consent has been progressed on this allocation in the 17 years it has been allocated. The site lies to the north and east of established employment and commercial areas off Uffington Road and Ryhall Road. Access to the Local Plan allocation was to be via a new road link from Uffington Road to Ryhall Road proposed in the local plan as Policy T1 this policy was not saved by the Council as there was no commitment to a route or the delivery of such a scheme, in September 2007. There is now no commitment to the provision of any form of link road. There has been no definitive route or funding included in recent Local Transport Plans (LTPs) and there is no commitment to deliver or fund such a link road on behalf of either Lincolnshire County Council or the District Council (see paras 2.1.5 and 2.1.6 above). Access to the site for employment uses is therefore constrained and without commitment to the construction of a link road viability of employment development in this location is questionable. In accordance with national guidance in preparing the SAP DPD the Council re-assessed the suitability of the allocated site both to retain as an employment allocation and for an alternative use (para 22 of the Framework refers).

2.4.2 The Employment Land and Capacity Study [SK26] study considered STAM14 (as site ref SK10) and concluded that access to the site from the A1 and local road network was heavily restricted, and that its lack of prominence from the A1 would affect its attractiveness to the market. The Study considered that if a new by-pass to the south of the town were to be provided the site, as part of the larger Newstead site, might be suitable for a large mixed use development. The site scored 18 points overall (scores for Stamford sites range from 15 – 27 points) and was therefore ranked much lower than the proposed allocation STM3.

2.4.3 STAM14 comprises 13.6 ha of land which is dissected by the River Gwash. Land on either side of the River Gwash is identified as Flood Zone 3 and functional floodplain and at risk of surface water flooding in the SFRA Level 2 [Maps 26, 29 and 30 SFRA level 2 SK37]. In the context of the sequential approach for flood risk this renders much of the site identified as STAM14 less suitable for development, particularly more vulnerable forms of development such as housing development.

2.4.4 There have been claims that this site is brownfield and as such is more sustainable than the greenfield sites selected for allocation. However, the planning history for the site reveals no former use. It is recognised that part of the site has the appearance of being formerly developed: the half of the site between the former railway line and the river and may have been affected by its neighbouring uses (industrial premises to the south off Uffington Road and the railway and the former Mirlees Blackstone foundry to the west). Even if it were agreed that part of the site is brownfield, this does not overcome the physical constraints imposed by the river, the flood zone and access restrictions, nor the concern that it would not represent a very good choice as an employment location, as set out above.

2.4.5 The site has now been allocated for development for 17 years. A planning application for a business park was submitted in 2000 but was subsequently withdrawn, since then there has been no apparent market or developer interest in the development of the site. The Employment Land and Capacity Study [SK26] raised concerns about the
attractiveness of a site on this side of Stamford to the employment market without the provision of a southern relief road to improve accessibility to the A1. Therefore, deliverability of the site for employment uses must be questioned. In addition the location of the site to the rear and side of established industrial and commercial estates would render it less attractive to the housing market, particularly as access (if it could be satisfactorily achieved) would come through an industrial estate (which is itself protected for employment uses by Policy SAP5). This, combined with the restricted developable area arising from the area at risk of flooding, makes the viability of any residential development on the site questionable.

2.4.6 The site has been assessed both for retention as an employment allocation and for reallocation for an alternative use. It is concluded that the physical, locational and access constraints to development raise significant questions about the deliverability of any form of development in this location and, therefore, preclude it from allocation. However, if these constraints can be overcome and satisfactory access achieved there is no reason why the brownfield part of the site cannot come forward for development through the planning application process, in accordance with policies of the adopted CS and the SAP DPD.

258 (W R Davidge Planning Practice for Mr William Strain) Land adjacent to STM1a. This site is to be considered in Session 3
Appendices:

Appendix 1: Minutes of Stamford Town Council meeting 6th July 2011

Appendix 2: Response to JMP report about Stamford Traffic Model prepared by Mouchel on behalf of LCC

Appendix 2: Response by Anthony Brown of Bayou Blu environment to SCOTs Rebuttal Statement regarding Landscape Matters
Stamford Town Council

Strategic Development Committee

Meeting held on 6th July 2011 to discuss Local Development Framework Site Allocations

Present:
Cllr Maxine Couch
Cllr Gwynedd Gibbs
Cllr Maureen Jalili (Chair)
Cllr Max Sawyer (Vice Chair)
Cllr Sheila Sismore
Cllr Brenda Sumner
Cllr Brian Sumner
Cllr Tony Story
Town Clerk

A special meeting was held following on from the Strategic Development Committee of 6th July to discuss the site allocations presented by SKDC on 5th July. All town councillors were invited to attend the meeting.

The response below was prepared by the Chair following discussion and recommendations from the meeting. Further amendments received after circulation to the Town Council have been added.

Response to South Kesteven District Council Local Development Framework Site Allocations

Before responding to the individual site allocations, we wish to make several points which we would like SKDC to take into account as the views of Stamford Town Council when considering site allocations and planning applications for Stamford.

In addition, we are appending to this document the draft chapter from the Stamford Town Council Town Plan relating to Housing in Stamford. In terms of demography, we would welcome comments on the potential increase in population numbers that can be expected both through natural growth and as a consequence of the additional housing allocation up to 2026 to allow us to look at other elements of provision within the town eg leisure, transport etc.

Stamford Town Council does not believe that further expansion of the town is either necessary or desirable; it believes that Stamford has already reached saturation point in terms of provision of facilities and a sustainable infrastructure for its’ current residents.

In relation to the existing population, and to increased growth, it has been the concern of the Town Council for some time that housing development has in the past been undertaken without adequate thought being given to infrastructure to support the population. This has been the case to the west of the town eg Rutland Heights estate where large housing complexes have been built without any regard to transport, shops, schools, medical care etc. This has had a consequent effect upon the town and particularly in relation to journeys required within the town to reach essential services. Stamford regularly suffers from traffic problems which are increased when there are any
accidents/works on the A1 but we are unable to cut down on local traffic because of inadequate public transport which, additionally, does not run after 6 pm.

Several councillors have already stated, through the Development Control Committee at SKDC, that a single national model and national policies do not always work in a rural urban environment eg parking provision for houses in towns such as Stamford because of the very limited public transport facilities outlined above.

It has also been evident to the Town Council that maximum consideration has not been given in the past to potential benefits which could be gained from 106 Agreements to the infrastructure of Stamford, neither has there been sufficient dialogue between SKDC and the Town Council on what facilities should be sought from such agreements; it has been the case that recent developments have included playgrounds for small children but no thought appears to have been given to facilities for older / growing children and there is a severe shortage of youth facilities in the town. As you will see from the draft chapter on Housing from the Town Plan, Stamford Town Council believe that one way to assist in the problems of infrastructure is for the introduction of the Community Infrastructure Levy to be applied to all new developments and for Stamford Town Council to have more say in how such monies are spent.

Additionally, the Town Council objects strongly to any use of agricultural and green land surrounding the town being used for additional housing development. We believe that land given over to food production should be maintained as such to meet the national overall present and future food needs of the population. It is the wish of the Town Council to retain the any agricultural land surrounding Stamford for continued food production with the exception of Stam01 and Stam02.

The existence of a green belt around Stamford serves to add to the attractive nature and placement of the town within a country setting. In this respect it is an essential element of Stamford’s charm and ability to attract the many the visitors to the town on which Stamford relies for its economic viability.

Stamford Town Council therefore wishes to reinforce its desire that these factors be given due importance when finalising the LDF and all future planning and site applications are considered. It remains a major concern of the Town Council that Stamford is becoming a commuter and retirement town and we believe that long term this would be both detrimental and extremely dangerous for the future of the town. We have a large, successful local college, New College Stamford, which carries many vocational courses and we would like to ensure that Stamford remains a vibrant, working town which reflects its very long history for these students and future populations to inherit. We are aware that a study undertaken at the request of SKDC in the last 5 years revealed a shortage of land for business, manufacturing etc and we would therefore hope that active work will be carried out to identify potential sites for employment purposes.

Additionally, Stamford Town Council is conscious, given the increased fears of future sustainability in terms of food and other resources, of the need to retain as much agricultural land as possible for the future and therefore After consideration Stamford Town Council believes that it would be more appropriate to provide the allocation in one urban extension rather than in allowing multiple sites to be added to an urban extension.

Given the increase in traffic coming through the town, and the desire of the Town Council to increase employment opportunities, the Town Council believes that any future planning for Stamford will also need to include at some future point a bypass and a second bridge.
**Site Allocations:**

The current housing allocation calls for an additional 535 houses to be built between now and 2026. We would comment on the following potential site allocations as follows:

**STAM01 (20.55 ha) Land South of Empingham Road**

Agree with impact and conclusions despite our reluctance to assign this site for development. The Town Council are unhappy with the use of this site but agrees that the proximity to the A1 would avoid more traffic having to travel through the centre of Stamford. It is also the only site which has multiple access to the town centre by means of four roads, i.e. Empingham Road, Tinwell Road, Casterton Road, and Roman Bank. However, we would stipulate that this agreement is only given, albeit reluctantly, as long as this includes major infrastructure and employment provision but this should be commercial rather than industrial.

**STAM02 (8.18 ha) East of A1, south of Empingham Road, Stamford**

As above.

These two sites are adjacent and opposite one of Stamford’s existing primary schools and is a large enough site to accommodate the total housing requirement at the same time as allowing for open spaces and adequate new infrastructure which must be a condition of any development.

**STAM03 (0.30 ha) Jacksons Building Centre, Radcliffe Road**

No objection in principle but only if employment use ceases and any housing must include on-site parking provision. Given the access to the main road – North Street - if this site were to become available and chosen we would recommend larger and fewer high value properties.

**STAM04 (0.36 ha) North Street Car Park**

Agree with conclusion. One of the most popular car parks in Stamford and major amenity for town centre shopping. It also serves both the Recreation Ground and the shopping areas and is probably the most important and accessible of Stamford’s car parks.

**STAM05 (1.50 ha) Stamford AFC, Kettering Road**

Agree with conclusion. Would stipulate that any housing development must be in keeping with this major vehicle approach to Stamford in terms of local architecture and materials and in keeping with current skyline. This is probably most suited to bungalows or single storey housing to maintain the low profile on this high spot of the town.

**STAM06 (0.32 ha) Sharmans Depot, Barnack Road**

Agree with conclusion. However we do have concerns about large/heavy vehicle movements in this particular location and consequent damage to the integrity of historical buildings. We do not believe that this area is suitable for heavy industry as this would have an unsightly view from Burghley and on the approach for visitors.

**STAM07 (11.65 ha) Welland Quarter Stamford**

Reiterate our original recommendation that this area is allocated to waterside development / leisure / commercial usage with retention of the allotments.
STAM08 (7.78 ha) Off Barnack Road, Stamford

Agree with conclusion. The Town Council strongly supports the need for employment opportunities. We would highlight potential problems from heavy vehicles travelling along this route through the town centre. Again no industrial usage for the reasons given in Stam06.

STAM09 (2.93 ha) Land to the South of Uffington Road

The Town Council reiterates its original submission that this is an ideal site for light industry / employment opportunities which should not be lost.

STAM10 (0.40 ha) Meadow View, Uffington Road

As for STAM09

STAM11 (0.44 ha) Land East of Meadow View Uffington Road

As for STAM 09 / 10.

STAM12 (1.30 ha) Land North of Uffington Road

The Town Council reiterates its original submission that this should be retained for light industry / employment opportunities.

STAM13 (0.77 HA) Adj Tollbar House, Uffington Road

The Town Council reiterates its original submission that this area be retained as open green space and are pleased that this accords with the conclusion of the report.

STAM14 (13.62 HA) East of Ryhall Road, Stamford

The Town Council believes that this should remain as it is or be used for light industry.

STAM15 (13.60 ha) Land East of Newstead Road

The Town Council reiterates its position that this area should be retained for employment opportunities.

STAM16 (26.77 HA) Land East of Ryhall Road

The Town Council reiterates its original submission that this area should be retained as open space and meadow plus a green space which could include a new cemetery as the current one will be running short of space in the not too distant future, and this could possibly incorporate a green cemetery.

STAM17 (37.12 HA) Land East of Newstead Road

The Town Council agrees that this site is not suitable for development for the reasons given as below:
a. Access and congestion – a second bridge would be required if major congestion were to be avoided impacting seriously on Stamford’s urban centre.
b. Impact on the existing landscape. This is a traditional agricultural / open land and residential development would be out of keeping with the rural setting.
c. The area has potential contamination constraints.
d. The area is too close to designated sites which the Town Council would prefer to see used for light industry / employment opportunities.
e. Flood plain risk and surface water flooding.
f. Would possibly impact directly on the aspect and views of Burghley House.

**ADD39 (0.74 ha) Land R/O Belvoir Close**

If this is considered to be suitable by the Highway Authority then given that it forms one of the approaches to Stamford we would suggest that any development should be small scale (not more than 12) and of a design and build appropriate to this approach to Stamford.

The Town Council does have concerns that if this were to be approved for residential use it could open up the possibility of development on RUT1 which the Town Council strongly objects to.

**ADD40 (0.87 ha) Land off Cherry Holt Road**

The Town Council agree with the conclusion of the proposals that this is unsuitable for allocation because of the constraints of the flood zone.

**ADD41 (1.16 ha) Land off Priory Road**

The Town Council believes this should be retained as open ground because of the open nature of this green area and its proximity to the Scheduled Monument (St Leonard’s Priory).

**ADD42 (0.87 ha) Land Adjacent to Kettering Road, Stamford**

Stamford Town Council do not agree that this would be suitable for residential development even if highways concerns are addressed for the following reasons:-

a. It forms part of the Four Counties Walk;

b. Access is inadequate;

c. It is an area of archaeological interest and should be protected as such;

**ADD43 (25.99 ha) Land East of Ryhall Road**

Please note this site is **still incorrectly identified** as being East of Ryhall Road when it is in fact to the **West** of Ryhall Road.

We agree with the recommendation that this would be suitable for leisure use and / or open space which might include a new leisure centre and new football ground. However we would suggest that any such use be located as far to the north-west of the site as possible to minimise the effect on this green field site. Allowance should be made for a new access from Ryhall Road to the Queen Eleanor School to enable future expansion of both the school and for leisure and sports facilities. Because of ongoing congestion of Green Lane and Kings Road down to Recreation Road and North Street, there should be restricted entry from these roads to the school buildings only, hence halving the concentration of vehicles to either access to this area ADD43 and main entry should be from the
new access road. The Town Council acknowledges that there is much local opposition to this change of use because of (a) the potential increase in traffic which will be generated by such a change and (b) the further loss of existing agricultural land.

**RUT1 (26.10 ha) Land North of Old Great North Road (includes area ADD39)**

Whilst accepting that this site is situated within the adjoining county of Rutland, Stamford Town Council strongly objects to this development for the following reasons:-

a. This would be major development which would put unacceptable strain on the infrastructure of Stamford in terms of transport, schools, medical services etc;

b. Whilst Stamford would bear the consequences of the increase in population, all council tax payments would go to Rutland County Council;

c. Large housing allocations here, added to Stamford’s own future housing allocation would be far in excess of the numbers required for Stamford;

d. The access and congestion from any major housing development fall mainly on Sidney Farm Lane which is not appropriate for any heavier traffic or on Little Casterton Road which already has traffic impact measures in place.

In respect of the types of housing preferred please see attached section of Town Plan. However, in addition, Stamford Town Council has also identified the need for a scheme of planned disabled housing which should be retained for the use of the disabled population. We understand that such schemes are currently being introduced in adjoining authorities.
Technical Note: 1039468/DPD/TN/001 v1.0

RESPONSE TO SCOT OBJECTION TO SKDC SITE ALLOCATIONS & POLICIES DPD

1. Background

Following publication by South Kesteven District Council (SKDC) of the submission version of its Site Allocations and Policies DPD in October 2011, a letter of representation and objection was received from the Stamford Chamber of Trade & Commerce (SCOT).

Central to SCOT’s objections were concerns over transport modelling work undertaken by Jacobs on behalf of Lincolnshire County Council (LCC) to examine the traffic-related impacts of each of three potential land allocations for urban extensions.

To substantiate their objection and underpin their case for an alternative site to be brought into consideration, SCOT commissioned JMP to undertake a separate traffic modelling exercise. The findings of the JMP study are set out in its report “Stamford LDF SATURN Modelling”.

LCC has commissioned Mouchel to undertake a review of the JMP report to provide the Councils with the basis of preparing a response to the SCOT objections.

The JMP interim report ‘Stamford LDF SATURN Modelling’ has been reviewed by Mouchel, to provide a response to the comments made of the Jacobs report ‘Stamford Traffic Model Traffic Forecasting Results Report – Evaluation of Urban Extension Sites’. The findings of the review and conclusions are set out in the following sections.

2. Response to JMP Comments

The report outlines the main concerns that Stamford Chamber of Trade and Commerce (SCOT) have with Jacobs report. The concerns are reiterated below alongside Mouchel’s response to these issues:

**Issue:** Different levels of development have been applied to the three urban extension sites tested, thus the sites have not been assessed nor can they rightly be compared on an equitable basis.

**Response:** In their report, Jacobs assume that the required level of housing outlined in the RSS is developed at a rate of approximately 40 units per hectare: this comprises 434 dwellings in scenarios (a) and 434 + 301 committed dwellings in scenarios (b). Jacobs then assumed that the remaining land would then be fully developed for employment up to the maximum allocation for employment stated in the Core Strategy (15.4 hectares assuming the 8.6 hectares outlined in the Site Allocation and Policies Development Plan Document is also developed).

The amount of employment development assumed for each urban extension site differs for each site, as the remaining area of land available for development, once the housing requirement is allocated, is different. This assumption provides an
equitable comparison of the traffic impact of each site, based on actual potential for trip generation, with the realistic assumption that each will be fully developed over time (up to the maximum outlined in the Core Strategy.

In the JMP report, their preferred method is to allocate land for the requisite amount of housing and then to assume that employment development on each site would be limited to 7.7 hectares (the land available for the smallest site), regardless of the actual land remaining for development. It is considered that this method represents an artificial comparison of only the location of the urban extension sites, without size being taken into account.

It is noted that the ‘East’ site, assessed in the JMP report, has more land available for development that any of the three urban extension sites (taking the 150 hectares that would be available for development, should the ring road be constructed, from the objection letter). Using the same method as outlined in the Jacobs report would therefore mean the trip generation from an additional 7.7 hectares of employment land would be added to the ‘East’ site.

The JMP analysis shows that, directly comparing all the sites by assuming no additional infrastructure, the ‘East’ site would have the most impact on traffic conditions, even with their preferred method of estimating trip generation. The JMP assessment shows that total travel time would increase by 302% should the ‘East’ site be developed, rather than 271%, 249% and 252% for the other three sites.

The ‘East’ site has therefore been shown by JMP’s own assessment to be least preferable in terms of traffic impact, if purely location is considered. If the full trip generation potential of the ‘East’ site were considered, the ‘East’ site is likely to compare even less favourably with the three urban extension sites assessed in the Jacobs report.

*Issue:* It is quite clear from the model output statistics that all the future development scenarios tested will considerably worsen the traffic congestion problems that the report acknowledges already exist in Stamford

*Response:* The intention of Jacobs report was to compare the traffic impact of each of the three proposed urban extension sites; the report did not seek to propose or assess any highway improvements or to address any impact.

*Issue:* Section 4.3 of the report states, ‘There is not a significant difference between the results of the urban extension scenarios …’; however, the report Conclusions state, ‘The assessment of the scenarios indicates that Scenario 4b – which represents an urban extension … on the west side of Stamford, south of Empingham Road, shows the best results in terms of overall journey times and average travel speed in the Stamford network;

*Response:* Although there is no significant difference between the results for each site, the results do indicate that Scenario 4b produces the best results. The conclusion should perhaps have been more qualified, so that it was clear that other results were not significantly worse. However, the text on page 17 provides this qualification, so in the context of the whole report, this is not considered contradictory.

*Issue:* Section 4.4 of the report states, ‘The signalised junctions within Stamford … are under significant pressure in the base year and the demand exceeds
capacity during peak periods. As no highway network improvements are included in the forecast scenarios, the junctions are over-capacity in the forecast scenarios.'

And

Jacobs was not requested by either LCC or SKDC to test any highway options either to address the acknowledged existing traffic congestion problems in Stamford or to support the various development scenarios.

Response: The purpose of the report was to compare the relative traffic impacts of each urban extension site, as highway improvement options had not been identified at the time of writing the report.

In their report, JMP assessed the impact of the Eastern Relief Road (proposed by SCOT). The JMP analysis shows that, with the proposed highway infrastructure (mainly the road bridge element), traffic conditions would be much improved. However, the other three sites are also likely to benefit from this additional road bridge and link road, but no analysis was undertaken to compare the relative impact of the three urban extension sites in the JMP report, with this improved infrastructure in place.

Issue: In paragraph 1.4, it is stated that 'the location of an urban extension adjacent to the A1 so that people have easy car access to other urban centres is not particularly sustainable'. In paragraph 1.5, it is stated that 'the decision taken by SKDC to propose an urban extension on the west side of Stamford in the absence of addressing Stamford’s existing traffic problems, let alone without considering future traffic problems, is, at best ill-informed, or at worst misguided.'

Response: It is considered that these paragraphs contradict each other: JMP consider that addressing existing/future traffic problems is necessary, presumably through construction of the Eastern Relief Road, but this would also provide easy car access to other urban centres, undermining their argument against locating the site near existing infrastructure, such as the A1.

3. Conclusions

The purpose of the Jacobs report was to assess the traffic impact of the three urban extension sites, as identified in the Site Allocation and Policies Development Plan Document October 2009. The report did not seek to address any traffic issues that arose from the traffic impact, but only to identify what traffic issues are likely to arise from developing land on each urban extension site.

The JMP report outlines an alternative method for estimating trip generation to that used in the Jacobs assessment, which does not take into account the full extent of land available for development on each site. Using this method, it is considered that they underestimate the trip generation arising from the alternative urban extension site proposed by SCOT, and in particular the ‘East’ site, by disregarding the larger size of this site relative to the three sites assessed by Jacobs. Even so, the JMP assessment shows that the traffic impact of the ‘East’ site is significantly worse than the other three sites.

It is considered that the method used to estimate trip generation in the Jacobs report is the more appropriate, as the likely trip generation of each site is fully reflected in the assessment, assuming that the development potential of each site would be fully exploited over time.
The JMP report also assesses the benefits of the ‘Eastern Relief Road’ in conjunction with the traffic impact of developing the ‘East’ site. The proposed highway improvements were not tested with the three urban extension sites assessed in the Jacobs report, so it was not possible to make any direct comparisons between these sites and the ‘East’ site proposed by SCOT in terms of their respective impacts post-mitigation.
Comment on the ‘Statement of Rebuttal of Development Allocations Based on Landscape Matters’ submitted in support of representation by the Stamford Chamber of Trade & Commerce

A report to
South Kesteven District Council

by
Bayou Bluenvironment
21st March 2012
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Scope of the Report

1. Bayou Bluenviornment Limited was instructed by South Kesteven District Council [SKDC] on the 23rd February 2012 to carry out the following:
   • To review the ‘Statement of Rebuttal of Development Allocations Based on Landscape Matters’ and Supporting Illustrative Material\(^1\) submitted in support of a representation by the Stamford Chamber of Trade & Commerce [hereafter referred to in this report as the CoTSOr] objecting to the allocation of Site STM3 [which includes STM 1e & STM 2c] on the western edge of Stamford, in SKDCs Site Allocation and Policies Development Plan Document [DPD];
   • To comment on the methodology used in the CoTSOr and its conclusions.

2. This review was undertaken by Anthony Brown, BA[[Hons] TP MALD CMLI, Managing Director of Bayou Bluenviornment Limited, a landscape planning and environmental consultancy. Anthony is a Chartered Landscape Architect and professional landscape planner with almost 30 years experience in the public and private sectors, including undertaking landscape character assessment, landscape and visual impact assessment and landscape sensitivity and capacity studies for a range of development proposals.

3. Anthony was project leader responsible for writing the ‘Landscape Sensitivity and Capacity Study’, January 2011\(^2\), whilst an Associate at David Tyldesley & Associates [DTA]. SKDC commissioned the 2011 DTA study as evidence base to inform the Site Allocation and Policies DPD and to help determine the most appropriate directions for future residential and employment development in the District. In that report the site in question is referred to as Site S2.

4. As well as the review of the CoTSOr, the following documents were considered in compiling this report:
   • SKDC Adopted Core Strategy, July 2010;
   • SKDC Site Allocation and Policies DPD, Submission, October 2011;
   • SKDC Site Allocation and Policies DPD, Submission Proposals Map, October 2011
   • South Kesteven Landscape Character Assessment, FPCR, January 2007;
   • SKDC, Landscape Sensitivity and Capacity Study, DTA, January 2011;
   • Rutland County Council, Landscape Character Assessment, 2003;
   • Rutland County Council, Landscape Sensitivity and Capacity Study, May 2010

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\(^1\) Don Munro (November 2011); Statement of Rebuttal of Development Allocations Based on Landscape Matters
\(^2\) David Tyldesley & Associates (January 2011); Landscape Sensitivity and Capacity Study Final Report; Ref. 1785 Final Rpt.; Issue 1.
5. A site visit was undertaken to remind me of the landscape character of the site and views into and out of the site, which included inspection from the six photograph viewpoints included in the CoTSoR.

Methodology used in the CoTSoR

6. Paragraph 1.4 of the CoTSoR describes the brief. It provides a landscape appraisal of the site in question and comments on the landscape sensitivity and capacity of the site as assessed in the January 2011 DTA study. Importantly it does not compare the site with other sites considered for allocation, which the DTA study did, and therefore it is of limited assistance in helping to assess and prioritise sites on the edge of Stamford for future development.

7. In appraising the landscape and commenting on the sensitivity and capacity assessment in the DTA study, the CoTSoR does not follow any recognised methodology. The January 2011 DTA study followed recognised best practice guidance on assessing landscape sensitivity and capacity, following a recognised methodology that had been previously used in a similar study for Rutland County Council, following consultation with statutory environmental bodies. The Rutland study, like the 2011 DTA study for SKDC, has been used as evidence base in RCCs Site Allocation and Policies DPD.

8. Paragraph 1.7 of the CoTSoR explains that the principal purpose of the assessment was to identify how the site relates to the River Welland valley. Thus at the outset it appears to make the assumption that the characteristics of the Welland valley are of overriding significance to determining the site’s contribution to the openness of the land surrounding Stamford, rather than to start with a wider remit to assess all characteristics of the local landscape.

Appraisal of Local Landscape Character – Reference to the 2007 LCA

9. Section 2 of the CoTSoR contains an appraisal of the local landscape character. It considers the National Character Areas [NCA] and concludes that the site lies close to the confluence of three NCAs, but that it is necessary to consider the landscape at the local level by looking at the district wide SK Landscape Character Assessment [LCA], 2007. From the 2007 LCA the site lies within the Kesteven Uplands character area, but the CoTSoR notes that it actually falls within the Rockingham Forest character area. The CoTSoR fails to recognise that in the 2007 LCA the boundary of the Kesteven Uplands national character area has been amended at the detailed scale following detailed assessment.

10. At paragraph 2.9 the CoTSoR criticises the 2007 LCA as being restricted to the South Kesteven Council boundary, thus restricting the consideration of the broader character of the surrounding landscape lying within the Rutland County Council area. The CoTSoR fails to recognise that the 2007 LCA included a desk based study of other LCAs in adjacent counties and districts [2007 LCA paragraphs 1.15, 1.36 & 1.37].

11. The CoTSoR repeats descriptions of the Kesteven Uplands from the 2007 LCA which are applicable to the study area. It is selective as to which of the descriptions it repeats. For example, it repeats the statement that “Modern human influences include the A1…” but fails to add the rest of the paragraph which continues “...and the East Coast Mainline Railway. These are both locally dominant features, and the traffic on parts of the A1 can be seen over a relatively wide area” which is of relevance to the assessment of landscape character of the allocation site.
12. The CoTSoR repeats the assessment of the sensitivity of the Kesteven Uplands from the 2007 LCA as being medium to high landscape sensitivity to new employment or residential proposals. It highlights that this is because of the high proportion of valuable landscape elements and relatively undisturbed character. This assessment in the 2007 LCA is for the entire Kesteven Uplands character area which covers an extensive area throughout South Kesteven. Clearly a site specific sensitivity assessment is required, which was undertaken in the 2011 DTA study but has not been done in the CoTSoR. The CoTSoR does not describe any valuable landscape elements within the site because there are none.

13. Paragraph 2.14 of the CoTSoR repeats two of the landscape management objectives for the Kesteven Uplands within the 2007 LCA, which are:

- Pay special attention to sensitive spaces around the edge of historic towns such as Stamford; and
- Maintain open areas that extend into the towns and villages.

Paragraph 2.15 of the CoTSoR then states that “It is reasonable therefore to expect any future studies or recommendations to take full account of these objectives and the medium to high sensitivity of the character area”.

14. With regard to the first bullet point above, the CoTSoR presumably assumes that it refers to the allocation site [otherwise it wouldn’t include it] but there is nothing in the 2007 LCA which describes the area of the site as a sensitive space.

15. The CoTSoR presumably assumes that the second bullet point above also refers to the allocated site, but there is no evidence for this in the 2007 LCA either. In actual fact it is my assumption that the bullet point refers to paragraph 4.29 of the LCA which states “The valley of the River Welland extends into the town and provides a valuable open space and fine views to some of the churches.” In my opinion this is referring to the land to the south of the allocation site, south of the A6121 which falls steeply down to the river valley and which continues into the town, and not the site itself which clearly does not extend into the town due to the housing to the east, and from where there are no views of the churches in Stamford. The SKDC Site Allocation and Policies DPD would appear to back this assumption up by stating that “The River Welland passes east-west through the town, its valley provides valuable open space known as The Meadows”.

**Appraisal of Local Landscape Character in the CoTSoR**

16. The landscape appraisal within the CoTSoR [paragraphs 2.16 to 2.38] is made against the background of the statements selected from the 2007 LCA, and is consequently flawed for the reasons given above.

17. The CoTSoR paragraph 2.17 and Figure 2 defines a study area, which from my site inspection appears appropriate. Paragraph 2.18 acknowledges that the study area reflects the land that will be affected by the allocated site, which is at its most 3km to the south, up to the Wothorpe ridge, and approximately 1.5km to the west. The study area is shown to extend up to approximately 1.5km to the east into Stamford, but clearly most of this will be screened by existing housing adjacent to the site. The study area is therefore limited and consequently there will be a limited area of land affected by development on the allocated site.
18. The six viewpoints included in the CoTSor from where photographs were taken are reasonably representative of key points from where an assessment of landscape character and key views can be made.

19. I broadly agree with the description of the topography in paragraphs 2.22 to 2.25 of the CoTSor. However, the statement of rebuttal comes to the conclusion that the site lies within the “open and distinct river valley side and ridgeline topography west of Stamford”. It is confusing the river valley landscape with the higher plateau above and on which the site sits. Photo’s 3 and 4 clearly show the flat nature of much of the site, with only the southern end falling gradually towards the A6121 Tinwell Road. In my opinion this demonstrates that the site occupies a plateau of high ground which lies between the River Welland valley to the south and the River Gwash valley to the north. It is the steeply falling land to the south of the site which lies within the River Welland valley, with the A6121 or perhaps the extreme southern end of the site defining the break of slope. This is more clearly shown in Photo 6 taken from the west. An examination of the contours on the OS 1:25,000 scale Explorer Map No. 234 also bears this out. Paragraph 2.26 acknowledges that the site lies on the ridge top plateau [and thus not within the Welland valley].

20. Paragraph 2.27 suggests the fields of the site are contiguous with the fields of the ridge and valley sides to the west, and that the vegetated A1 corridor has insufficient strength to break the continuity of the landscape. In my opinion the CoTSor misinterprets the site and the fields to the west as lying within the Welland valley, relying on views from high ground in the south as shown in Photo’s 1 and 2 and the Photomontages 1, 2 and 3. It also underestimates the impact of the A1 and in particular the constant traffic on it which is visually dominant as recognised in the 2007 LCA [see paragraph 11 above].

21. Paragraph 2.28 describes the sequence of fields falling from the ridgeline to the river floor, and suggests that this defines the crucial visual termination between the countryside and town. It suggests that this point happens to be where two national character areas meet i.e. Rockingham Forest and High Leicestershire. Without doubt the site lies at the transition of town and countryside, and where several national character areas meet. In my opinion the site is more characteristic of the Kesteven Uplands or High Leicestershire character areas than the Welland Valley within the Rockingham Forest NCA. The CoTSor would appear to agree with this by repeating the key characteristics of the Kesteven Uplands of relevance to the allocated site in paragraph 2.12.

22. The Rutland County Council Landscape Sensitivity and Capacity Study, May 2010, includes at Figure 10 a map showing the local landscape character setting of Stamford which distinguishes between the Rutland Plateau [also identified at the local level as the Ketton Plateau] character area and the Welland Valley [identified at the local level as the Middle Valley East] landscape character area. Although not specifically show on this map, most of the allocated site appears to coincide with the Ketton Plateau character area, with only the extreme southern end coinciding with the Middle Valley East landscape.

23. Paragraph 2.27 on page 10 [there is another para 2.27 on page 9] describes built forms as seen in views from the south. This includes the “stark and regular edge of Stamford’s western suburbs”. This is a key characteristic of the Kesteven Uplands as recognised in paragraph 2.12 in the CoTSor. It will of course remain as a stark and harsh edge unless new development is provided on the allocated site which “should present a varied settlement edge including landscape treatment” as recommended in the 2007 LCA [paragraph 4.30].

24. Paragraph 2.27 also includes reference to the A1 corridor, and paragraph 2.30 describes this as well vegetated with “a character akin to a woodland belt”. Such a description is more
characteristic of the Kesteven Uplands than the Welland valley. Furthermore, the CoTSoR makes no reference to how the A1 has restricted development of Stamford to the west, with recent housing between the Old Great North Road and the A1 occupying land rising to 70m Above Ordnance Datum i.e. higher than the allocated site.

25. Paragraph 2.37 concludes that the allocation site contrasts with the stark and regular edge of suburban Stamford which spread across the eastern end of the Empingham Road ridge in the late 20th Century. The SKDC, Landscape Sensitivity and Capacity Study, DTA, January 2011, argues that this setting reduces the sensitivity of the site and increases its capacity to accommodate residential and employment development which would represent a continuation of the growth of Stamford westwards, up to the A1, in keeping with settlement form and pattern.

26. Paragraph 2.37 also concludes that the open fields of the site define the Welland valley as it approaches Stamford from the west, which provides a highly sensitive open character important to the town’s setting. As described above, in my opinion the CoTSoR misinterprets the setting of the town from the west by assuming that the site forms part of the Welland valley landscape falling southwards to the River Welland corridor. Views from the west clearly indicate the much flatter topography of the site which contrasts with the surrounding landscape to the west. In my opinion it is the steeply sloping fields to the south of the A6121 that defines the edge of the valley and which extends into the town, which clearly the allocated site does not. Sensitive mixed use development of the site, with landscape treatment to present a varied settlement edge, in keeping with the recommendations in the 2007 LCA, together with high quality and designed business park alongside the A1 in accordance with a comprehensive masterplan as set out in Policy STM3, will enhance the setting of the town from the west including retention of the highly sensitive Welland valley landscape.

Evaluation of the SKDC Landscape Sensitivity and Capacity Study, DTA, January 2011

27. In paragraphs 3.1 to 3.6 the CoTSoR criticises the 2011 DTA study by assuming that it is restricted to the SKDC boundary and thus is a blinkered assessment not showing the true extent of issues and sensitivity to setting and character of the allocated sites. The 2011 DTA study included detailed fieldwork around the town [paragraph 2.17] and surveys of the specified sites and their surroundings [paragraph 3.36]. Background information included review of the National Character Areas covering the site and its surroundings; review of the South Kesteven Landscape Character Assessment, FPCR, January 2007, which itself included a desk based study of other LCAs in adjacent counties and districts [2007 LCA paragraphs 1.15, 1.36 & 1.37]; and review of the Rutland County Council, Landscape Sensitivity and Capacity Study, May 2010 which includes assessment of the landscape character setting of Stamford at the local level as discussed in paragraph 22 above. Far from being a blinkered assessment, the 2011 DTA study fully addresses the landscape character setting of the site in accordance with the methodology described in the study.

28. The remaining paragraphs in Section 3 of the CoTSoR considers the sensitivity and capacity study in the 2011 DTA study, and puts forward its own assessment of the allocated site. Its assessment is based on its own appraisal of the local landscape characteristics of the site which, for the reasons discussed above, lead it to a different conclusion. In my opinion the findings of the 2011 DTA study are sound and robust, and provide an appropriate evidence base for the Council’s Site Allocation and Policies DPD, for the reasons that I give above.

29. I do not comment on each of the remaining paragraphs 3.7 to 3.26 in the CoTSoR because it simply arrives at different conclusions to the DTA 2011 Landscape Sensitivity and Capacity Study. It is important to note that it reaches its conclusions following its assessment of one site, without
considering other sites on the edge of Stamford which were considered in the 2011 DTA study. However, paragraph 3.26 of the CoTSoR suggests that in making its conclusion that the site has a Low to Medium overall capacity, it should be afforded a low priority with 5 other sites assessed in the 2011 DTA study above it in priority of allocation. The CoTSoR cannot make this comparison given its narrow brief. Furthermore, it is suggesting that several sites on the northern and eastern edge of Stamford are of higher priority for development, one of which has the Macmillan Way long distance footpath running through it, despite at paragraph 3.6 the CoTSoR stating that... “sensitive views are heightened in importance as they are afforded to those walking ...long distance footpaths...”

In Section 4 of the CoTSoR the basis on which the site is proposed for allocation is discussed, with regard to Policy EN1 in the Core Strategy and extracts from the SKDC Site Allocation and Policies DPD. In allocating the site, the CoTSoR states that the Council undermines the stated aims of Policy EN1 and fails to meet sub objectives as set out in the DPD. It suggests that allocating the site does not respect the findings of the South Kesteven Landscape Character Assessment, FPCR, January 2007, and that the allocation is not based on robust evidence but on what it describes as the flawed South Kesteven Landscape Sensitivity and Capacity Study.

In reaching these conclusions the CoTSoR refers back to its own appraisal of the local landscape characteristics of the site. I do not comment on Section 4 of the CoTSoR in detail because it simply arrives at different conclusions to the DTA 2011 Landscape Sensitivity and Capacity Study. It is worth commenting, however, on the photomontage included in the CoTSoR to give an impression of development on the site. It appears to indicate a mass of dense residential development rather than the proposed mixed use residential and high quality business park to be developed in accordance with Policy STM 3. Under this policy a comprehensive masterplan is to be prepared for the whole site to ensure, amongst other things:

- “ Appropriately planned green infrastructure and landscaping within the design and layout of development to both reduce the impact of development on the landscape and to provide a landscaped corridor between new development and the existing residential area on Lonsdale Road. Green infrastructure should incorporate public open space, play and recreation facilities and other community open space as considered appropriate;

- The design and layout of development is of a high quality and standard which recognises the importance of this location at the entrance to Stamford”.

In my opinion allocation of the site helps meet the spatial objectives which underpin the Core Strategy, including the promotion of a more sustainable pattern of development by directing the majority of all new development to the market towns within the district, including Stamford. Development of the site in accordance with Policies STM 1e, STM 2c and STM 3 will not create significant adverse impact on landscape character of the site or its surroundings, or significant adverse visual impact. Allocation of the site is in accordance with Core Strategy policies, in particular Policy EN1 and objectives set out in the SKDC Site Allocation and Policies DPD, and takes into account a robust evidence base including South Kesteven Landscape Character Assessment, FPCR, January 2007 and SKDC Landscape Sensitivity and Capacity Study, DTA, January 2011.