Dear Ms Waye,

SKDC SAP - COMMENT ON ADDITIONAL STATEMENT - SES22(i) ENGLISH HERITAGE - SESSION 4

Our Chamber has in its representation made on 18th November 2011 and Additional Statements of 19 October 2012 set out much detail related to matters the subject of comment in the English Heritage Additional Statement SES22(i).

English Heritage in making its Additional Statement of 19th October 2012 was clearly unaware of Stamford Chamber’s representations of the same date. Stamford Chamber’s latter representations included the Munro with Stamford Chamber Review of Stamford Development Allocations Based on Landscape Matters, which is particularly relevant to the English Heritage representations made in 2011 and 2012.

However, had English Heritage personnel considered the matter of the proposed Stamford Development Allocations in a holistic manner in keeping with their professional obligations, it is likely they would have reached the same conclusions and would have represented English Heritage to the SKDC and the Hearings in a similar way to our Chamber.

Our Chamber notes that English Heritage has made representation on the SAP at the earlier stage, and confirms in its Additional Statement that those representations remain valid. Those relevant to this Comment on English Heritage’s Additional Statements are:

Consultee: 372928   Comment ID: SASub56   Consultation Point: Paragraph (2.2.1)
Consultee: 372928   Comment ID: SASub57   Consultation Point: Allocations (3.1.1)
Consultee: 372928   Comment ID: SASub58   Consultation Point: Policy STM1 Housing Allocations Stamford
Consultee: 372928   Comment ID: SASub59   Consultation Point: Policy STM2 Employment Allocations Stamford
Consultee: 372928   Comment ID: SASub62   Consultation Point: Policy SAP H1 Other Housing Development

In its original representations English Heritage endorses all of the housing and employment allocations proposed by SKDC SAP for Stamford, notwithstanding that five of the eight sites are wholly greenfield. These include sites STM1a (Land adjacent to Kettering Road) and STM1d (Stamford AFC Kettering Road), and employment site STM2a (Land North of Barnack Road).

Stamford: The Finest Stone Town in England
Apart from requesting the inclusion of development criteria ‘to avoid negative impacts' and ‘preserve and enhance the significance and setting of nearby heritage assets’, English Heritage expresses no concern as to the potential impact which the development of these sites will have upon the historic environment and setting in the landscape of the areas of Stamford in which these three sites are located.

With regard to employment site STM2a (Land North of Barnack Road), this is a particularly surprising volte face. In October 2004 this site was the subject of a Planning Appeal Inquiry concerning the proposed use of the site for B1 employment use. English Heritage objected strongly to the proposal stating “Development on this site would clearly adversely affect the setting of the Registered Park and the historic relationship between Burghley and the river (Welland)”. In the event, the Appeal was allowed. A copy of the letter of Objection is set out at the foot of this letter.

In relation to English Heritage’s latest submission SES22(i), using its paragraph numbering, our Chamber advises:

2. Newstead site, including ring road.

Stamford Property Co Ltd failed to ask the consent of the landowner of site STAM14 who opposed their proposals including by the sending of a letter to the Stamford Mercury. This Chamber has always opposed the Newstead site with the exception of STAM14. Site STAM14 was specifically incorporated into the 1995 Local plan for development.

English Heritage wrongly assumes that our Chamber’s Ring Road proposals and the Newstead proposal are connected. They are not.

English Heritage wrongly presumes that our Chamber’s current Ring Road proposal is similar as the 1998 DoT proposal for a Stamford Relief Road. The objectives are dissimilar The Dot had only a Relief Road linking the A43 Kettering Road to the A16 Uffington Road in order to relieve Stamford Town Bridge. Our Chamber’s Ring Road has much wider traffic relief objectives for all of Stamford. The line of the two roads through Burghley Park are also dissimilar. At the foot of this letter are the 1988 DoT Exhibition documents and a Chamber/JMP page which illustrate these differences.

It appears that English Heritage is endeavouring to pre-empt the determination of a Ring Road planning application which has not yet been made. It is not the function of unelected quangos such as English Heritage to presume to determine planning policy. Quangos and Officers propose; elected members dispose. They will do so only after considering all the facts which, when such a planning application is made, will include the design merits of the proposal, landscaping and mitigation measures resulting from an Environmental Impact Assessment of the scheme.

Much play is made of the status of Burghley Park. That part of the Park adjoining Barnack Road was a late addition and contains an area locally known as ‘Dustbin Corner’. Burghley House itself is some 1 kilometre distant from the nearest part of the route of our Chamber’s proposed Burghley Link part of the Ring Road and will not be seen from the Ring Road or vice versa.

Our Chamber suggests that English Heritage personnel have a professional obligation to weigh and balance even handedly negative and positive impacts of development. English Heritage personnel do not appear to have fulfilled this obligation.

Any perceived negative impact of the Burghley Link component of the proposed Ring Road must be weighed against the positive benefits which will accrue towards the preservation and enhancement of the Stamford Conservation Area resulting from the relief from traffic that the proposed Ring Road will bring about. This Conservation Area was the first in the UK and contains over 500 listed buildings. A further 100 listed building are within Stamford but are outside the Conservation Area, one such being St Leonard’s Priory.

*Stamford: The Finest Stone Town in England*
The comments of English Heritage in its Additional Statement are diametrically opposed to the position which it has now adopted in respect of the proposed SAP employment site STM2a (Land North of Barnack Road). These are:

5. Site STAM14

These comments would also appear to suggest an element of prejudice against the best interests of Stamford as a whole, and Stamfordians living on the West of the town.

English Heritage should also reflect whether its obvious support for development of sites in which there are Burghley interests (Preservation Trust and Family Trust) has encouraged those interests to seek to inflict major damage to five of the eight principal entrances to Stamford.

i. Proposed employment site STM2a (Land North of Barnack Road)
ii. Proposed employment site STM2c (Land adjacent to the A1 off Empingham Road)
iii. Proposed housing site STM1d (Stamford AFC Kettering Road)
iv. Proposed housing site STM1e ((Land between Empingham and Tinwell Roads)
v. Replacement of Stamford AFC site on Kettering Road with oversize Football Stadium on Ryhall Road, without which housing site STM1d cannot proceed.

Had English Heritage read the Munro with Stamford Chamber Review, it would also have been more readily apparent that Site STAM14 extends Eastwards from the River Gwash only up to the 30 metre AOD contour. Site STAM14 is in visually dead ground; and was assessed by Munro as having a landscape capacity for development partly as Medium to High, and partly of High. Much of site STAM14 is brownfield land.

English Heritage will now have read the Munro with Stamford Chamber Review of Stamford Development Allocations Based On Landscape Matters submitted to the Examination on Friday 19th October 2012 and which was mailed to them by our Chamber on Tuesday 23rd October in CD-R format by first class mail. As a consequence the views expressed in its 2011 and 2012 submissions may change.

We invite the Inspector to consider these points.

Yours sincerely,

Eg. Gilman

F E GILMAN  
For Stamford Chamber of Trade & Commerce

01780 482 962  office  
0796 833 5725  mobile  

tony.gilman@btconnect.com

Stamford: The Finest Stone Town in England
ENGLISH HERITAGE
EAST MIDLANDS REGION

M J Sibthorpe
Head of Land Use Planning Services
South Kesteven District Council
Council Offices
St Peter's Hill
Grantham
Lincs NG31 6PZ

Direct Dial: 01604 735 457
Direct Fax 01604 735 401
Our Ref: LI/51373
18 February 2003

FAO Mr I V Wright

Dear Sir/Madam

Notification under Environment Circular 01/2001
Application for Planning Permission
Land at Barnack Road, Stamford

Thank you for your letter of 7 February 2003 notifying English Heritage of the application for planning permission for the above site.

This application appears to be very similar to the previous proposals on which we commented in a letter of 18 November 2002. We therefore reiterate the significant comments made in that letter (copy attached).

Yours faithfully

Carol Pyrah
HISTORIC BUILDINGS INSPECTOR

S.K.D.C.
19 FEB 2003
PLANNING DEPARTMENT
Mr I V Wright
South Area Planning Officer
South Kesteven District Council
Council Offices, St Peter's Hill
GRANTHAM NG31 6PZ

By fax & post

18 November 2002

Dear Mr Wright

PROPOSED INDUSTRIAL DEVELOPMENT (B1), LAND AT BARNACK ROAD, STAMFORD

Thank you for your letter of 1 November notifying English Heritage of the outline application for planning permission for industrial development on land at Barnack Road, Stamford.

Many of the historic environment issues surrounding this application are similar to those considered by Peterborough City and Cambridgeshire County Councils in previous applications (in 1996 & 1997) for gravel extraction by the Nene Barge & Lighter Co Ltd on a site between the River Welland and Barnack Road across the county border.

In representations made to Peterborough City Council in September 1996 (and reiterated in 1997) English Heritage highlighted the high landscape value of the Welland Valley, the setting of Stamford from the east and the setting of the Grade I listed Burghley House and its Grade II* Registered Park. For these reasons we recommended that the applications for gravel extraction be refused. Cambridgeshire County Council cited the impact on the historic parklands, the setting of Stamford and the river valley as reasons for the subsequent refusal.

The site identified in the current application is adjacent to the existing engineering works. It is between Barnack Road and the River Welland and is immediately outside the boundary of the Grade II* registered Burghley Park. Development on this site would clearly adversely affect the setting of the Registered Park and the historic relationship between Burghley and the river. Although a row of poplars on the boundary of the site performs a partial screening from Burghley Park in summer, historically there were important views out from Burghley House and other points in the park which need to be taken into account when taking planning decisions. The first series OS map of 1824 shows the double avenue running north from the house crossing Barnack Road (further east than the application site) and running down to the river, meeting the long western avenue at Uffington.

44 DERNGATE NORTHAMPTON NN1 1UR
Telephone 01604 733400 Faxline 01604 733401
www.english-heritage.org.uk
The National Monuments Record is the public archive of English Heritage

57
Further encroachment of industrial development would also have an impact on the easterly approaches to Stamford – an historic town whose national importance was highlighted by its selection as the first ever conservation area.

Although Uffington Park is not on the English Heritage Register of Parks & Gardens, the proposals would also appear to affect the setting of this historic park on the northern side of the Welland. The intervisibility of the historic houses and parks of Uffington and Burghley remains an important element of the historic environment of this side of Stamford.

There is no mention in the application of potential archaeological implications for the proposals. Given the location of the site on the river gravels we would normally expect to see desk-based assessment and, in most cases, field evaluation, undertaken prior to determination.

Notwithstanding the designation of the application site for employment uses in the outdated local plan, the site is not allocated for development in the recently withdrawn draft Local Plan 2001-2011.

We therefore would stress the sensitivity of the proposed site and draw your attention to the substantial historic environment issues which arise from the application. These suggest that the current application should be refused.

Please do not hesitate to contact me if I can be of further assistance.

Yours sincerely,

Carol Pyrah
HISTORIC BUILDINGS INSPECTOR

cc  Mr R J Stewart, Conservation Officer, South Kesteven District Council
    Paul Edwards, East of England Region, EH
Department of Transport
A43/A16 Trunk Road

Stamford Relief Road

This pamphlet describes alternative routes for an improvement scheme to provide relief to the A43/A16 trunk road through Stamford.

Please visit the exhibition at
Stamford Town Hall

Friday 1st July 1988 — 10.00 a.m. to 8.00 p.m.
Saturday 2nd July 1988 — 10.00 a.m. to 2.30 p.m.

We need YOUR views
The Alternative Routes

Further Important Points

<table>
<thead>
<tr>
<th>Proposed Road Standard</th>
<th>Length of New Trunk Road</th>
<th>Length of Existing Trunk Road Superseded</th>
<th>Estimated Cost (1987) (a) Bridge (b) Roundabout</th>
<th>Net Economic Value (Low and High Growth)</th>
<th>% of Total Traffic Remain Existing Trunk (% HGV)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Green Route</td>
<td>Single Carriageway</td>
<td>2.1 km</td>
<td>2.6 km</td>
<td>(£3.8m to £3.6m)</td>
<td>32% (50%)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>(a) £3.8m</td>
<td>(b) £3.6m</td>
<td>(-£0.1m to +£1.3m)</td>
<td></td>
</tr>
<tr>
<td>Yellow Route</td>
<td>Single Carriageway</td>
<td>2.5 km</td>
<td>3.8 km</td>
<td>(£3.5m to £3.1m)</td>
<td>32% (50%)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>(a) £3.5m</td>
<td>(b) £3.1m</td>
<td>(-£0.3m to +1.5m)</td>
<td></td>
</tr>
</tbody>
</table>
The Alternative Schemes

There are two schemes for the Stamford Relief Road now proposed as alternative solutions with a further choice for the treatment of the junction of the new road with the B1081. All the alternative proposals are illustrated opposite.

There is a common section of route to both schemes which commences on the existing A43 at Wothorpe, just east of Lathmill. It swings eastwards through pasture land across the B1081 to enter Burghley Park between the Burghley (Bottle) Lodges and Lady Anne's Hotel. The route then curves further northwards to skirt the Burghley Park Cricket Ground at which point the two schemes diverge.

**The Green Route** continues on a large radius curve through parkland still within Burghley Park to a new ground level roundabout situated approximately 40 metres south of Barnack Road in the vicinity of Abbott's Close. Both sections of Barnack Road and an access into Burghley Park also connect into this roundabout. The route emerges from the roundabout in a north-easterly direction. After passing through a narrow gap between residential properties fronting Barnack Road, it rises on embankment over allotment gardens to cross both the Peterborough to Manton Junction Railway Line and the River Welland on a single viaduct. The route continues north-eastwards on embankment (max. height 7 metres) across rough pasture land in the flood plain of the River Welland, passing close to St. Leonard's Priory to another ground level roundabout constructed on the existing A16 Uffington Road just west of its junction with Priory Road. This roundabout would have connections to Uffington Road and the new supermarket development permitting the removal of the roundabout currently proposed. Priory Road would be stopped up either side of the new route.

This route requires the demolition of one residential property.

**The Yellow Route** continues on a large radius curve through parkland and pasture land still within Burghley Park to a new ground level roundabout situated approximately 35 metres south of Barnack Road just beyond the Nevage Engineering Works. Both sections of Barnack Road and an access into Burghley Park also connect into this roundabout. The route emerges from the roundabout in a northerly direction, rising on embankment over agricultural land, to cross on individual bridges both the Peterborough to Manton Junction Railway Line and the River Welland and continues northwards on embankment (max. height 8 metres) across pasture land in the flood plain of the River Welland utilising part of the dismantled railway line to another ground level roundabout. This is constructed on the existing A16 Trunk Road at the site of the former railway bridge some 180 metres east of the Priory Road junction.

The roundabout would be connected to Uffington Road and the access road to Hudda Mill and others.

This route would not involve the demolition of residential property.

Alternative Junctions at the B1081

The impact of the proposed Relief Road is particularly important where it crosses the B1081 within the town. Any work affecting this area, with the abrupt transition from landscape to townscape and the sudden reentry of High Street, St. Martin's, has to be given careful consideration. Two alternatives for the crossing of the B1081 are technically feasible and have similar traffic performances.

(a) Relief Road with Bridge

The Relief Road would pass beneath the B1081 in approximately 6 metres of cutting. To connect with the existing road system, a junction with Kettering Road would be required, and a link road provided between the B1081 opposite the Botte Lodges and the new route. All junctions would be simple priority face junctions with ghost island markings. There would be no street lighting.

(b) Relief Road with Roundabout

The Relief Road would be at approximately ground level and connect with the B1081 at a roundabout. It would pass into and out of the road system past the B1081, Kettering Road would not require a connection to the Relief Road. The roundabout and its immediate approaches would have street lighting.

Other Alternatives Considered

Three other routes for an east/west bypass of Stamford have been considered.

The first of these would leave the A1 at the A606 at Kempingham, skirt Stamford to the north and join the existing A16 east of Uffington. A43 traffic would be routed via the A1 to the A606 junction.

The second would commence on the A43 at Easton on the Hill, connect with the A1 and skirt Burghley Park to the south before joining the existing A16 east of Uffington.

The third generally follows the yellow route described above but continues along Barnack Road to cross the Welland Valley and join the existing A16 east of Uffington.

These three routes have been rejected as none of them would perform effectively as a bypass to the town and would not attract sufficient traffic away from the urban area.

Other alternatives that were considered included improvement of the existing Trunk Road through Stamford and the introduction of traffic management measures within the town to direct traffic to other routes. These were rejected as they would not provide any relief to the town itself and would merely result in the transfer of traffic congestion and vehicle/pedestrian conflict to other routes.
Why is a Relief Road Needed?

The existing A43/A16 Trunk Road through Stamford as part of the national trunk road network linking the east coast, the expanding port of Boston and the agricultural areas around the market town of Spalding with the Midlands via the A43, and the south via the A1.

Although the provision of the A1 north/south Stamford Bypass removed that long distance traffic from the town centre, the narrow streets still have to carry a considerable burden of east/west through traffic especially on the A43/A16 Trunk Road. These flows conflict with local traffic circulating within the town and add to the congestion at peak times.

In particular the significant heavy commercial vehicle content of the trunk road traffic has an adverse affect on people and the local environment in terms of noise, dust, fumes, visual intrusion and vibration, as well as causing structural damage to historic buildings.

The Department of Transport is promoting an east/west bypass in order to facilitate the movement of Trunk Road traffic. It is recognised that as a consequence there will be a reduction in overall traffic levels on the existing roads, particularly of lorries. Some redistribution of traffic on existing roads would occur with most roads experiencing a decrease, but with slight increases on the west end of Wickenby Road and on the A43 through Witham.

This would assist efforts to safeguard and enhance the environment and would be consistent with Stamford’s designation as a Conservation Area.

Both the alternative routes would be expected to take similar amounts of through traffic away from the town by directly connecting the existing trunk roads east and west.

Pedestrians and cyclists suffer under the present conditions and run the risk of injury when in conflict with the heavy traffic. Such conflicts would be reduced by either route. A relief road would also provide a good link to the industrial area of the north-east of the town and serve commercial development in the town itself.

The Exhibition

This pamphlet gives only a limited amount of the information available about the alternative routes. Larger scale plans and other details will be on display at the exhibition. Representatives of the Department of Transport and Lincolnshire County Council will be present to answer any questions you may have and to discuss the alternative proposals with you.
How you can help
You can do this by completing the Questionnaire. Before you do so we suggest that you visit the exhibition where more information will be on display.

Whether or not you are able to visit the exhibition we would be grateful if, when you have decided which scheme you think would be best for the area, you would complete and return the enclosed prepaid Questionnaire by 15th August 1988.

Many factors affect the choice of schemes. These include environmental effects, engineering details, traffic benefits, effect on property and agriculture, community severance and capital cost.

By visiting the exhibition and asking questions you will obtain a wider appreciation of these factors before deciding which scheme you think would give the best overall solution.

Road Planning and The Public
The Procedures Outlined

1. INVESTIGATION OF ALTERNATIVES
2. PUBLIC CONSULTATION ON ALTERNATIVES 12/2/89
3. PREFERRED ALTERNATIVE ANNOUNCED 19/4/89
4. FURTHER INVESTIGATION OF PREFERRED ALTERNATIVE
5. STATUTORY ORDERS PUBLISHED AND OBJECTIONS INVITED
6. POSSIBLE PUBLIC INQUIRY
7. DECISION ON STATUTORY ORDERS AFTER CONSIDERATION OF OBJECTIONS
8. LAND ACQUISITION
9. START OF CONSTRUCTION WORK

What happens next
As soon as possible after the results of the Public Consultation have been analysed and considered along with all the other factors involved, the Secretary of State will make an announcement stating which scheme has been selected for further development. In due course detailed proposals for the selected scheme will be published and a Public Inquiry may follow.

It should be appreciated that the consultation process now being carried out is in addition to the statutory procedure for establishing the line of the route. Any comments you make now will not, therefore, prejudice your right to comment for or against any scheme subsequently published under the Highways Act.

Arrangements for compensating those affected by road proposals have been improved by the Land Compensation Act 1973 as amended by the Local Government Planning and Land Act 1980. Leaflets explaining the details will be available at the exhibition or can be obtained from:

Department of Transport,
East Midlands Regional Office,
Cranbrook House,
Cranbrook Street,
Nottingham,
NG1 1EY.