

**Introduction:**

The document provides a perspective to the background documents submitted by Stafford Borough Council which support the supermarket planning application and proposed leisure centre on the space enclosed within the proposed new settlement boundary through Westbridge Park, Stone.

**Section 1**, (Reply to P2-N22) demonstrates the erroneous facilities database attached to Ploszajski Lynch Consulting (PLC) report by examining, for the second time, further erroneous tennis court data and the recorded condemnation of this report by Stone Town Council.

**Section 2**, (Reply to P2-N23) explores the terminology, phrases, statements and looks for evidence and justification of the claims made.

**Section 3**, Provides a summary of the evidence supporting the case for rejection of the proposed new settlement boundary through the park which you visited Wednesday 3<sup>rd</sup> August 2016.

**Section 1:**

A response to library document **P2 -N22 "Additional Information on Westbridge Park"** submitted by SBC contains a submission by Cllr. R M SMITH on 11 DECEMBER 2014 on Sports and Recreational Facilities in Stone to consider and **adopt** the findings of a report from Ploszajski Lynch Consulting (PLC) Ltd. 2014

The same report was rejected by Stone Town Council (STC) on account that comments purported to be made by Stone Town Council were untrue. This was recorded in the STC minute from General Purposes Committee 03 November 2015 [GP16/092](#). The council requested that SBC withdrew the comment. The PLC report was debated by Stone Town Council (STC) and sufficient doubts about its validity resulted in a motion being passed that STC "could not support the report recommendations". This was minuted by STC Ref. General Purposes Committee, 09 February 2016 [GP16/135](#)

There are a number of problems with the PLC report which would suggest that it had not achieved its objective. Amongst these were the inaccuracies in its **facilities database**, the relevance of modelling tools used and the use of irrelevant borough wide data, all of which undermined its conclusions for Stone.

One blatant tennis court inconsistency has already been mentioned in my note P2-N19 with reference to the Sport England's comments to the supermarket planning application in library document P2 N15, regarding court provision in Stone. This renders the spare court capacity argument unsound. (Sport England have been informed of this by letter). The PLC report 2014 actually contain many more errors and misrepresentations. E.g. Ref: P2-N22 "Additional Information on Westbridge Park submitted by SBC, when on page 8, the Ploszajski Lynch Consulting Ltd report, considers the outdoor tennis provision within a 10-minute drive of Stone is recorded as follows:

"Church Eaton Tennis Club, Stafford (2 tarmac), Moddershall Oaks Health Spa, (1 tarmac, floodlit), Stonefield Park, Stone (2 tarmac), Stone House Hotel, Stone (1 tarmac), Stone Lawn Tennis & Squash Club, Stone (6 tarmac, floodlit) Yarlet School, Yarlet (1 tarmac) **Westbridge Park (2 tarmac)** "

In fact, at the time of the report, they should have noted the following:

*Church Eaton is NOT 10 min drive from Stone (over 10 miles away)*

and the report actually gives the address as Stafford?

*Yarlet School has 3 courts (not 1) and **Westbridge Park has 3 court (not 2)**. Alleyne's Sports Centre (Completely missed from the report) has 4 courts. In addition, Christchurch Academy has two marked courts (although probably not used)*

**Amongst other evidence was inaccurate location and missing numbers of indoor sports facilities, sports fields and swimming facilities. In conclusion the database is too erroneous and misleading to draw any fit and proper conclusions as supported by Stafford Borough Council.**

Today, August 2016, the data has changed yet again and only goes to illustrate the importance of Sport England recommendation that a proper user needs assessment should be conducted every three 3 years

## Section 2:

In the library document, **P2-N23 "A Leisure Strategy for Stone Brief for Inspector (pdf 190kb)** the following information/terms are used

(a) **Use of the term "developed":**

SBC states its commitment to The Stone Leisure Strategy and outlines the argument for the retail development on the park by maintaining the undeveloped part of Westbridge Park as open space (these football pitches are already protected) and implying that the side containing community facilities/car parks is **developed** and therefore fit to develop further. This is clearly not the case and a misuse of the term develop when applied to the park. I point out that other parks in Stafford contain more non-grassed area and community facilities than Westbridge yet are exempt from being referred to in this matter. E.g. Rowley Park. The term has been concocted for this project/purpose only.

i.e.

*"Council agreed it would be necessary to release a small area of land on the **already developed part of Westbridge Park.**"*

(b) **SBC have "no finances"** There is no evidence of loan/project balance sheets and SBC actions/comment indicate otherwise i.e. Budget projections and reference to : P2-H3, Agenda of Cabinet. 5 November 2015.

*(i) "5.3.15 The plan currently assumes the continuation of the borrowing requirement for Stone Leisure Strategy, however the predicted increase in surpluses to 2017-18 and available capital resources now available are likely to negate that need. The actual borrowing requirement will be assessed as part of this year's budget process."*

*(ii) Published articles in the local press would also suggest the decision to finance through land sale and supermarket build is a **choice** not a necessity.*

*<http://www.staffordshirenewsletter.co.uk/fun-victoria-park-families-say-improvement-plans/story-29018846-detail/story.html>*

With reference to another SBC Project in Stafford the following statement is made "Fun in Victoria Park: families have their say on improvement plans" Stafford Borough Council:

*"The plans will now go back to the Heritage Lottery Fund (HLF), which will make a decision whether to fund the project. **The council has set aside around £800,000 and is***

*aiming to get another £1.7 million from the HLF. Final plans will be assessed next summer and work would begin in 2018."*

Whilst the land sale agreement at the park is subject to planning permission, and the supermarket planning application has been submitted, there is no evidence of the "link" between the retail proposal and the leisure project as what might be suggested by a Grampian condition (ref: <http://planningguidance.communities.gov.uk/blog/guidance/use-of-planning-conditions/what-approach-should-be-taken-to-imposing-conditions/> Paragraph: 009 Reference ID: 21a-009-20140306

In addition, the Stone Leisure Project has not undergone any formal consultation with the Stone Public or the Stone Town Council and no formal plans, proposals or designs have been produced for any part of project since the Beattie Consultation on the project outline idea in April 2013. (note the link below is not to a Library document but is available of SBC web site) [http://www.staffordbc.gov.uk/live/Documents/Programme%20Officer/Programme%20Officer%202013/J19 Stone Consultation Report.pdf](http://www.staffordbc.gov.uk/live/Documents/Programme%20Officer/Programme%20Officer%202013/J19%20Stone%20Consultation%20Report.pdf)

I also point out that the same document (appendix E, page 5, Question & Answers) clearly stated that leisure centre would be built **before** the supermarket.

*"Q) When would the leisure centre and food store be delivered if this were to go ahead?*

*(A) The replacement leisure centre would come first in 2015 and the food store would follow."*

The current evidence does not support this.

### Section3:

Consideration of the Settlement Boundary.

Your site visit on Wednesday 3<sup>rd</sup> August enabled you apply a "ground Truth" test to the site. There appears to be some difficulty in following the criteria to define the line taken by the boundary. Ref. PSP2 P9 Section 11 to 2:11 to 2.27

2.13 States the boundary follows **recognised physical features**. This new boundary leaves the canal, crosses approximately midpoint to a public house car park onto a footpath not defined by the A520 road, then goes into the park along a service road and exits the park at some point next to pumping station. SBC suggest that the path taken by a line showing the bounder of the green infrastructure. This clearly isn't defined by physical features and actually does not extend into the pub car park? As such some of these feature at **not physical nor are they properly defined**.

2.14 **Site with Planning permission**. There is no granted planning permission in the new area at present and therefore the site should not be considered. The planning application is actually triggering the boundary change and is a **retrospective action**.

2.15 Consider the **historic context of boundaries**: The previous "Residential Development Boundaries" (RDBs) from the now superseded Stafford Borough Local Plan 2001 provide an historical context which may be relevant to take into account in considering the future planning of each settlement. The boundary along the canal defines other current zones as well such boundaries as the conservation area, town boundary and retail frontages. There are no boundaries through the park.

2.17 A Settlement Boundary is more closely aligned to what most people would perceive as the settlement edge.

This boundary clearly **isn't the edge** of anything since it goes through the park and **not an edge of settlement**.

2.23 Some of the Parishes which contain Key Service Villages have embarked on the process of producing a Neighbourhood Plan (see specific boundary proposal explanations below). Stafford Borough Council fully supports the production of Neighbourhood Plans and has actively engaged with those Parishes who have commenced work on Plans. Some of the Neighbourhood Plans have proposed allocations in their draft / pre-submission Plans, and these have been reflected in the settlement boundaries proposed below. It is noted that some of the allocations in Neighbourhood Plans will provide more housing in Key Service Villages than was anticipated in the Plan for Stafford Borough. However, as the time scales of the Neighbourhood Plans may extend beyond 2031 this does not undermine the development strategy of Plan for Stafford Borough

The draft Stone Neighbourhood Plan (NP) clearly designates all the park as Local Green Space and its building are community facilities which afforded the same protection. The new proposed settlement boundary is clearly in conflict with NP and express wishes of the people of Stone not only through the NP but also previous petitions and recent online surveys.

PSBP2, P32 sets out the criteria for determining a new settlement boundary from SP7.

The Westbridge park boundary clearly contravenes this criterion and I point out that there is no mitigation stated to this criterion; and suggest that this is a function of the planning application alone.

*".. Settlement Boundaries will be defined to ensure that development within that boundary will, in principle, be acceptable because it:*

*f) will not impact adversely on the special character of the area, including not impacting on important open spaces and views, all designated heritage assets including, Listed Buildings, Conservation Areas and locally important buildings, especially those identified in Conservation Area Appraisals;*

There is an adverse effect to the grade 2 listed building "The Mooring, which is **totally obscured** by the proposed supermarket and a partial obstruction of the grade 2 listed Church.

The representation below (without the red box correction) was supplied by SBC in 2013 as to what the site would look like. It is gross distortion of the truth. Your site visit confirms this.



In reality the food store proposed which looks more like an aircraft hangar and this structure will completely obscure The Moorings apartments and the lower part of the church as shown by the red box

*g) will appropriately address the findings of the Landscape Character Assessment, and the conservation and enhancement actions of particular landscape policy zone / zones affected;*

It does not address the landscape character of the area because it is void of retail development, void of a building of this type and size and it is a park and a flood plain.

*i) will not lead to the loss of locally important open space or, in the case of housing and employment, other locally important community facilities (unless adequately replaced)*

There is a loss of tennis courts and spaces used by the public for events such as festivals such as food and drink, festival week and twinning visits which extend onto the car parks around the existing community facilities.

*j) will not be located in areas of flood risk or contribute to flood risk on neighbouring areas;*

The space is located in zone 2 and 3.

*k) will ensure adequate vehicular, pedestrian and cycle access as well as cycle and short stay parking facilities on the site; and*

Access is inadequate and dangerous with children's play areas, recreational area for people and dogs and festivals being added to the retail activity of customers shopping and vehicle deliveries to a supermarket

*l) will not adversely affect the residential amenity of the locality."*

Any development will completely change the nature of the park which gets its identity from the flood plain and other green features of the area. It does not get its identity from the town.

Development proposals should maximise the use of brownfield redevelopment sites within the Borough's towns and villages to reduce the need for greenfield sites. Only where insufficient sites on previously developed land, in sustainable locations, are available to meet new development requirements should greenfield sites be released.

The site is clearly a park since 1951 containing community facilities and not a site for development in the "mixed use" sense and it is clearly not a brownfield site.

P2-L31, Plan for Stafford Borough - Inspector Final Report (pdf 369kb) June 2014 p18, Section 91 states:

*"...The introduction of new buildings, car parks and roads could also begin to change the character of this fringe of the park, and erode the appearance of this important gateway into the town and its historic Conservation Area, as well impacting on SBC's Green Infrastructure Strategy [D28; D34; E54; E85]."*

### **Conclusion:**

I respectfully suggest that the proposed new Settlement Boundary through Westbridge Park takes a path which is not clearly defined by the criteria. The new space it encloses does not contain "development" in the conventional sense; it contains "Community Facilities" just like any other park. On this criteria, the new Settlement Boundary through Westbridge Park is unsound and clearly not justified.

The final decision may well be shaped by two applications which are both going through "due process". On the one hand is a retail application and its tenuous links to leisure improvements, whilst on the other hand is the Local Green Space designation defined in Stone's draft Neighbourhood Plan. Both of these applications will undoubtedly change the "face" of this space forever; one preserving the legacy of the park for future generations, whilst the other has the potential to surrender the park for further development once the precedence is set.