

Hearing Statement on behalf of Keep Westbridge Park Green (KWPG)

Policy Stone 1 – Stone Town

Strengthening the role of the town centre as a market town, including enhancing the primary shopping areas and providing additional convenience (1,400 sq m) and comparison (2,200 sq m) retail floorspace, and whether this is supported by the Retail Capacity Studies.

KWPG supports strengthening the role of Stone town centre as a market town, including enhancing the primary shopping areas. However, it sees no justification for any proposed development of sites outside the town centre and suspects that the Council is seeking retail development at Westbridge Park despite the Plan stating that no such provision is being made (para. 8.14). KWPG's suspicions are founded on the consultation carried out by the Council as landowner earlier this year based on sketch proposals for a supermarket and new sports centre.

It is difficult to understand the justification for any new retail floorspace outside the town centre. It seems to be based on a quantitative assessment that suggests that Morrisons is heavily overtrading and that this somehow translates into a need for more floorspace. However, the report itself states that if an excess of comparison or convenience goods expenditure manifests itself this does not necessarily translate directly into a requirement for additional floorspace (Document D15, para 5.25). It also cautions that surveys tend to exaggerate the performance of large stores at the expense of smaller shops.

There is very limited qualitative analysis of Stone town centre but what there is suggests that it is performing well and is a vital and viable centre. The White Young Green (WYG) Retail Capacity Study describes the town centre as having a well balanced mix of both national multiple and independent convenience goods retailers (Document D15, para 4.24).

The concept of overtrading is based on whether a store is performing above company average. An average is just that, an average figure across a retailer's portfolio of stores of many shapes and sizes and there will be many stores in the portfolio trading both above and below the company average. Just because a store trades above company average does not mean that there is a planning justification to create more floorspace.

Whilst the WYG Retail Capacity Study asserts both a quantitative and qualitative need for additional convenience goods floorspace in the form of a medium sized supermarket, there is very little qualitative analysis. The need is stated to be justified on the basis of relieving overtrading at Morrisons yet there has been no consideration of trading conditions or the customer experience at the store. There is no evidence in the report of typical indicators of unsatisfactory overtrading such as unduly long queues at checkouts, goods piled on the floor because of lack of shelf space, and congestion in the car park, all of which might be a justification to relieve overtrading.

Interestingly, the survey showed high levels of satisfaction with 76% of people in zone 2 around Stone disliking nothing about their main food shopping destination. Only 1% stated that there was difficult parking, 1% said that the store was too busy and 0% said that there were not enough checkouts (Document D17, appendix 3, question3). This does not imply any degree of unacceptable overtrading.

Additionally, Morrisons is the only store in Stone that is assessed as overtrading. WYG's most recent update (Document D15) records the Co-op as trading at only 59% of company average, other town centre convenience retailers trading below average and Somerfield trading at only 22% of company average. In addition, since the original WYG report both Aldi and Heron Foods have opened new supermarkets in Stone. In short all aspects of the convenience retail sector are represented and there is no qualitative deficiency in provision.

A further justification that is often used to promote new floorspace is that expenditure is leaking to distant stores and centres in a manner that fosters unsustainable travel patterns and should be 'clawed back' by the provision of a new store. That is clearly not the case in Stone. The first WYG report noted that Stone has increased its market share from 77% to 96% since 2000. This is explained as being a result of the rebranding of Safeway as Morrisons. 96% is a very high expenditure retention level and the study acknowledged this, finding that the high market share of core zones across the area limited the ability to claw back expenditure (Document D16, para.5.40).

We conclude that there is no adequate justification in the retail capacity studies for provision of a new supermarket. We also note that the WYG Update report (Document D15) notes a "significantly lower" capacity for comparison goods floorspace than in the 2010 study and concludes that any such capacity can be absorbed in the town centre (para 6.44).

Having asserted a need for a medium sized supermarket, WYG assess Westbridge Park as the best site on which to accommodate this need. However, the Update report states that WYG is aware that a variety of sites are now being considered to help address capacity. This implies that there is a choice of sites and KWPG sees no justification for suggesting that Westbridge Park is a suitable location for a new supermarket.

Having concluded that there is no proper justification for new retail floorspace in the Plan's evidence base KWPG also concludes that there can be no justification for a mixed use development at Westbridge Park.

Justification and details of the proposed mixed-use development at Westbridge Park, and its likely impact on recreational/green space assets, canal and flooding.

Introduction

KWPG objects to the "provision of mixed use development at Westbridge Park" being included in Policy Stone 1 because it is not justified anywhere in the Plan or its evidence base and the site of the proposed allocation is not defined anywhere. The site does not appear in the Key Diagram, Concept Diagram or the Proposals Map and Westbridge Park itself is designated in its entirety as green infrastructure. In this respect the Plan is imprecise and internally inconsistent.

Inconsistency with Green Infrastructure Strategy and Policy

There is no explanation or justification of the mixed use proposal. In particular, the proposal is contrary to the designation of Westbridge Park as 'Green Infrastructure' and entirely inconsistent with green infrastructure policy N4 elsewhere in the Plan. It is also in conflict with the Council's

Green Infrastructure Strategy (Document D34) which is part of the evidence base and which includes Westbridge Park as part of the proposed Stone Canal and Riverside Park, shown in figures 2.5 and 2.6. The whole of Westbridge Park, apart from the existing car park and leisure centre, is shown to be included in the Canal and Riverside Park and most of it is designated as flooding mitigation. There is a green corridor linking the Park and the town centre.

The Strategy sets out to create an area of accessible land in the heart of Stone based around the two watercourses to ensure that most areas of the town can have access to green space and open space. This is to be combined with access improvements for flood control and biodiversity enhancement measures to create “a truly multifunctional space, and contribute to the future sustainable prosperity of Stone providing recreational opportunities for the communities of the town and an attractive asset for visitors” (D34, page 23).

This is consistent with the recommendations of Kit Campbell Associates in March 2009 in their PPG17 Assessment and Open Space, Sport and Recreation Facilities Strategy for the Council (Document E54). The report discussed the Green Network and commented on “the **huge significance of Westbridge Park** in Stone and the land adjacent to it along the river and canal, but the relatively fragmented nature and limited quality and value of other spaces in Stone” (our emphasis) (Document E54, page 149). It recommended enhancing the area close to Westbridge Park Fitness Centre in order to make it more park-like and attractive for informal activities (pages 45 and 201). It added that it was desirable to open up greater access to river and canal and link the park to the Stone Meadows Local Nature Reserve to the north and other land to the south. The report recommended drawing up a long term masterplan for Westbridge Park (Page 263, objective 4.3)

Kit Campbell updated their report in 2013 (Document D28), building upon the recommendation for a Stone Canal and Riverside Park. On page 17 they advise:

“Stone and Walton sit on either side of the floodplain of the River Trent and the Trent and Mersey Canal, including three local nature reserves – Goodall Meadow, Crown Meadow and Southern Meadow (known collectively as Stone Meadows). While access to the canal towpath is generally good, access to the river is much less so. Therefore the Council will draw up and implement a masterplan for the park in association with Stone Town Council, the Friends of Stone Meadows and landowners within the park. The objectives of the masterplan will be:

1. To improve access to the floodplain in order to provide local residents with natural greenspace of strategic significance
2. To work with landowners to embrace biodiversity through changes to land management
3. To create a series of walking and cycling paths to and within the park
4. To provide signage and interpretation.

Page 24 of the same report comments “In Stone the Borough Council is currently considering the possibility of a new leisure centre at Westbridge Park. This seems to be a good suggestion, although other aspects of the proposals have generated significant local opposition.”

This is presumably a reference to the 4699 signature KWPG petition (the town’s population is some 14,500) that was presented to the Council and which called for the mixed use designation for Westbridge Park to be withdrawn from the Plan for Stafford Borough.

The Green Infrastructure designation is also consistent with the findings of the inspector into the adopted 2001 Local Plan. He made his comments in the context of a proposed marina on the canal but said at para. 9.22.4: “As regards the range of permissible use, I accept that the area in question is on the fringe of Stone’s town centre and contains uses such as car parking which serve the town centre. Nevertheless, as I perceive it, in the main, the character of the area derives from its relationship – functionally and visually – with the Trent and Mersey Canal; as such, it is somewhat distinct from the town centre. In the light of this I find the proposal that the area be defined for canal related development both reasonable and appropriate”. The inspector also rejected an objection that sought the extension of the town centre boundary to cover part of Westbridge Park.

Westbridge Park is properly designated as Green Infrastructure because of its important recreational function, accommodating leisure facilities, a girl guides centre, a scout centre, a childrens’ playground and a canoe club house as well as being vital green separation between Stone and Walton. The Park also accommodates the week long Stone Summer Festival, annual Stone Food and Drink Festival and the Stone Bonfire. A mixed use allocation is entirely inconsistent with this.

Imprecision over the Proposed Allocation and Inconsistency with Evidence Base

The Plan does not explain what development is proposed for the mixed use allocation or what area of land is to be involved. Indeed, as drafted, the Plan would seem to be proposing development on the entire 5.8ha area of Westbridge Park. The site is not discussed in the employment chapter and provision is made for employment elsewhere in the town. Similarly it is not suitable for housing, being in the flood plain, and is not shown as a housing site in the Plan.

The Council commissioned Capita Symonds to undertake a Flood Constraints Report (Document J6) which was published in 2010 and this looks at a relatively small area by the car park and tennis courts which it said was being proposed for a non-residential community building or GPs surgery. There is no mention of any other form of development.

The Council itself carried out a consultation as landowner rather than local planning authority in 2013 on sketch proposals for a new supermarket on the northern part of Westbridge Park which was intended to fund a new leisure centre. The Council’s consultation leaflet stated “if there is no support for a food store in this location it is likely that a food store will go elsewhere in Stone” which clearly implies that the Council is aware of other sites. KWPG commissioned architects, Lathams, to assess the development proposed in the leaflet in terms of its land take and they concluded that a significantly larger area would be needed to meet commercial requirements of supermarket operators than the current area occupied by the leisure centre, tennis courts and car park (Appendix 1). Indeed the access road shown on the consultation leaflet lies to the south of the existing access, eating into the green space of the Park.

The Stone chapter of the Plan states that there is retail capacity at Stone and need for new supermarket provision by 2015. However, paragraph 8.14 of the Plan states that “there are no specific proposals to provide for this provision”, adding “In line with the National Planning Policy Framework, the focus of new development should be at Stone town centre with sites considered through a sequential approach”.

The WYG Retail Capacity studies identify the part of Westbridge Park that accommodates the tennis courts and leisure centre as a potential development site and as the most sequentially preferable site in Stone. However, their site analysis accepts that the site is in the flood plain and not well located to existing retail facilities (Document D17, appendix 13). As the Plan expressly states that there is no specific proposal for retail development, then it would appear that the undefined mixed use allocation, for which no site specific provision is made, does not include retail. It is therefore difficult to understand what provision is being made and for what purpose.

Inconsistency with Flooding Constraints

The plan lacks any evidence base to support any form of development at Westbridge Park and this also applies to flooding constraints. The Capita Symonds report only considered a small site area but confirmed that the site is partly within flood zones 2 and 3 and that a sequential test was needed. It commented “The sequential test should be undertaken as early as possible within the planning process and should consider alternative locations for the proposed development within the Borough. The sequential test, depending upon the results, should indicate which type of development at the site is most likely to be suitable **and indeed whether the site is developable at all**” (our emphasis) (Document J6, para. 6.2).

The report also makes it clear that in order to ensure that flood risk is not increased adjacent or downstream of the site flood plain compensation storage will need to be provided on or near the site on a like for like basis in order to offset any increases in flood level as a result of developing and raising ground levels within the flood plain (para. 6.6).

The report concludes that a sequential test should be undertaken as a priority to determine whether development is feasible from a planning perspective, adding “only then should further consideration of whether the site is or can be safe from flooding be undertaken” (para. 7.6).

As far as we are aware, no sequential exercises have been carried out and there are no proposals for flood plain compensation. Therefore there is no evidence that any part of Westbridge Park is suitable for any form of development. This renders the Plan ineffective and unsound .

Inconsistency with the adopted Conservation Area Character Appraisal

The Stone Conservation Area Character Appraisal (Document E85) was prepared by The Conservation Studio and adopted by the Council in 2008. It comments that “the most prominent landmark within the conservation area and beyond is the stone built tower of St Michael’s Church which can be viewed from many parts of the town and from the canal towpath and is one of the defining features of the town. The most impressive view is obtained along the approach to Stone from Walton where the church stands well above its surroundings. Unfortunately this view is spoiled by the blue Westbridge modern sports centre (outside the conservation area) in the foreground” (para. 6.7).

The document also comments that “the canal is a haven for wildlife and the canal towpath forms a green linear walk on the edge of the settlement – an important resource for the town and a vital element in the Conservation Area’s special interest” (para. 6.14).

KWPG contends that a mixed use designation is inconsistent with this appraisal, particularly with regard to maintaining the important view of St Michael's Church. Although the Plan is silent on what form of mixed use is proposed KWPG commissioned architects, Lathams, to assess the supermarket development shown on the Council's consultation leaflet in terms of visual impact as well as commercial reality. Lathams considered the impact on the view of St Michael's Church and demonstrated that the supermarket proposal would exacerbate the damage to the view already caused by the existing sports centre (Appendix 1). Indeed the outline massing of the proposed supermarket was indicated incorrectly in the consultation leaflet.

As well as impairing the view the proposed development would introduce significant traffic, signage and lighting to the area, all of which has the potential to damage the setting of the conservation area. On this basis we consider that the proposed development allocation would fail to preserve and enhance the character and appearance of the conservation area.

Conclusions

KWPG consider that the mixed use allocation at Westbridge Park is ill conceived and lacks any justification. As such it renders the Plan unsound. The Plan can be made sound by deleting any reference to the mixed use allocation.