

11 October 2013

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THE PLAN FOR STAFFORD

Examination

**Wednesday 30 October 2013
10:00 a.m.
Civic Centre, Riverside, Stafford**

ECONOMY (POLICIES E1-E8)

Further Submission

on behalf of

RALEIGH HALL PROPERTIES LTD

With regard to

Policy E4 – Raleigh Hall

McDyre & Co. Ref: PE05

McDyre & Co. are Town Planning Consultants and Planning Project Managers. Our Practice deals with many aspects of planning and development over a broad sphere, including residential, industrial, commercial and leisure sectors. Based in Cheshire we give professional advice to clients over a wide geographical area covering all the North West of England and other areas further afield.

Directors:- B C McDyre M.Sc. (Eng.), D.I.C., Dip.T.P., M.R.T.P.I., Chartered Town Planner, B. McDyre B.Sc.(Hons.)

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INTRODUCTION

1. We submitted representations to the Plan for Stafford Borough – Publication (Pre-Submission) Version in February of this year on behalf of Raleigh Hall Properties Ltd. Our comment reference numbers were as follows:-

PS269 – Para 6.16

PS270 – Policy E1

PS271 – Policy E2

PS272 – Policy E4

2. These Further Submissions on behalf of Raleigh Hall have a two-fold purpose:-
 - Address the Inspector's issues and questions in relation to Policy E4 (Raleigh Hall).
 - Address third party comments submitted with regard to Raleigh Hall at the publication (pre-submission) stage in February of this year.

INSPECTOR'S COMMENTS

3. The Inspector has prepared a "Schedule of Matters & Issues for Examination." At para. 6.2 (b) (iii) he posed the following question:-

*"Is the proposal to deliver 6 ha. of new employment land at **Raleigh Hall** Industrial Estate appropriate, effective, justified and soundly based, including flooding and surface water, nature conservation, landscape, utilities and accessibility issues, the need for local infrastructure improvements and the impact on the local community?"*

4. We address these questions and issues under the following sub-headings:-

Appropriate, Effective, Justified, Soundly Based

5. The existing Raleigh Hall Industrial Estate is in Policy terms a “Recognised Industrial Estate” (RIE). The proposed extension land at Raleigh Hall is an appropriate natural extension providing for expansion of the existing industrial estate which is now fully developed. The effectiveness, justification and soundness are addressed in our earlier submission ref. PS272.

Flooding and Surface Water

6. The Raleigh Hall site has no history or experience of flooding. At Appendix 1 is an extract from the Environment Agency flood maps which confirms that Raleigh Hall is not within an area liable to flood.

Nature Conservation

7. An extended Habitat Survey of the Raleigh Hall expansion land was commissioned by Raleigh Hall from consultants “Urban Green ecology” in the summer of this year and a report produced on 5 September. A copy of the report was sent to Stafford Borough Planning offices. In summary, site displays some species-rich boundary hedgerows, the loss of the small woodland stand to the west of the site due to access is fairly species poor and will be compensated by the planting of native trees or the creation of a replacement woodland stand.
8. A small range of common farmland bird species were recorded on-site. The report recommends that a detailed breeding bird survey is carried out prior to the submission of development proposals, which should include suitable mitigation for nesting birds and replacement of loss of potential nesting habitat as appropriate.
9. Mature oak trees provide opportunities for roosting bats. There are badger setts within the northern and western hedgerows and evidence that badgers

pass through the site and use the field margins for foraging. A detailed Badger Survey will be required to fully assess the extent of badger usage. The detailed Tree Survey and Activity Service for bats and the Badger Survey are recommended prior to submission for planning for development and would be controlled by planning condition.

10. No signs of water vole or reptile were recorded and no further surveys are required.
11. There are no water bodies on site suitable for supporting a breeding population of amphibians (Great Crested Newt). There are no records of GCN within 1km of the site. There are however other ponds within 250m of the site and others further afield and surveys of all the ponds within 500m will be required to determine the presence/absence of GCN and to inform any detailed mitigation measures as may be required. These will need to be carried out in the appropriate season, March/April, and mitigation measures proposed prior to submission for any planning application for development.
12. In summary, although further detailed survey work is required and mitigation measures proposed where appropriate, there would not appear to be any bar to development occasioned by the need to protect important habitat.

Utilities

13. Water supply has always been adequate and further to the February 2013 submissions discussions have taken place with Severn Trent Water and a water supply is available. We note also that a representation was submitted by Severn Trent Water in February to the Publication (Pre-Submission) Plan ref. PS13 requesting the deletion of a Policy E4 criterion to Raleigh Hall as follows:-

“Remove reinforcement at Raleigh Hall sentence – this is no longer required.”

Renewable heat and electricity are readily available to the expansion land from the adjacent Biomass Power Plant. This was established in 2007 and has

provided the existing industrial estate and the Eccleshall area with renewable energy and has been recognised by Stafford Borough Council as a major contributor in meeting low carbon targets within the borough.

There is also an adequate gas supply.

Accessibility

14. At the time of the pre-submission Plan consultation in February of this year transport and traffic consultants commissioned by Raleigh Hall submitted a preliminary report concluding that geometry, vehicular visibility, background traffic and general traffic generation had all been considered by them and that the proposed development for an employment centre can be delivered satisfactorily.
15. Since then traffic consultants, Axis, have produced technical drawings to show that vehicular access to the expansion site at Raleigh Hall can be satisfactorily achieved and these have been submitted to Stafford Planning Officers as well as to Staffordshire Highways.
16. A copy of Axis drawing 1431-01-SK110, dated 10.09.13, is at Appendix 2 to this Further Submission. Also at Appendix 2 is a copy of an email from Mr Barry Alcock at Staffordshire Highways to Mr Andrew Bell, of Axis, confirming that the proposed access layout road linking onto the A519 as detailed on the drawing is acceptable in principle to the Highway Authority. Further information is stated as being required should a planning application be submitted.

Local Infrastructure

17. Mains sewers and surface water sewers are available to the site and would form an extension of those currently serving the existing industrial estate. An electricity sub-station already exists and would be extended or a new facility provided on the expansion site.

Impact on Local Community

18. The nearest residents to the expansion land at Raleigh Hall are those living at Underwood Farm which comprises a farmhouse and three barn conversions renovated in recent years by Raleigh Hall Properties who have let them out on shorthold tenancies. There are no plans to redevelop the residential properties for commercial use. The amenity of these residents will be protected through a combination of landscaping, tree planting, fencing and the positioning of commercial buildings or light industrial buildings.
19. The same may be said of the residential buildings to the north and south of the expansion land, namely Ankerton Ash and Rose Bungalow. The property on the opposite side of A519, Woodside Cottage, may also be similarly considered and there is also a small field between that property and the expansion land at Raleigh Hall.
20. Further afield it is considered there would be little or no impact on the wider community from what is a relatively modest extension to the existing industrial estate.

THIRD PARTY COMMENTS

21. Two matters have been raised with regard to Raleigh Hall in submissions made to the Borough Plan (Pre-Submission) stage:-
 - Raleigh Hall does not have good transport links to Stafford, Stoke-on-Trent or the M6 (Comments ID PS7, PS60, PS170).
 - The net development area for Raleigh Hall is only 4 ha, not 6 ha. as shown in the Plan and would not therefore be able to pay for additional infrastructure that would be necessary – Comments ID PS59, PS61.

Road Network

22. The expansion land at Raleigh Hall has good access to A519 which leads directly to motorway M6 at Junction 15 to the north and via A41/A518 to Telford in the south.
23. Raleigh Hall has also good access via A519 to A5013 which leads directly to Junction 14 of M6 at Stafford. Both A519 and A5013 are Class A roads intended to distribute commercial traffic on the wider as well as the local network.
24. Raleigh Hall also has good access to B5026 which leads to Stone to the east and Market Drayton, via A53, to the west and onwards to Nantwich. This is a Class B Road which distributes traffic, including commercial traffic, on the wider network. The expansion land at Raleigh Hall is modest in size, approx. 4 ha, and its traffic should be capable of being comfortably accommodated on these roads.

Size of Site

25. The comment that the true size of the Raleigh Hall expansion land is approximately 4 ha. is correct. The actual size of the available land is 4.2 ha. and excludes Underwood Farm and the Biomass Unit on the east and north east corner of the Borough Plan proposed allocated area for Raleigh Hall. The plan at Appendix 3 shows the allocated area and the available land. The expansion land has been promoted by Raleigh Hall for some years and along the way the Biomass Unit has been built and included. As mentioned earlier, it is proposed to retain Underwood Farm and so an appropriate adjustment should be made to the boundary of the Raleigh Hall expansion land to coincide with that shown edged red on the plan at Appendix 3.
26. The question was raised by the third party correspondence that the smaller site, 4.2 ha, would not be able to fund the infrastructure required. However, Raleigh Hall Properties have confirmed that the infrastructure requirements, mainly in

terms of proposed vehicular access arrangements, are quite capable of being funded by the expansion land. All other items of infrastructure as described earlier in this Further Submission are at hand.

CONCLUSIONS

27. Raleigh Hall Estate is a 12 ha. well established and well maintained employment facility in mid-Staffordshire, family owned and operated since 1980. The Estate provides significant local employment in the rural area and the expansion site will add job opportunities once developed. The existing estate is full and has been identified in successive updates of the Borough Council's Employment Land Review as having good ratings for market factors, physical factors and sustainability factors.
28. The practical issues and questions posed by the Inspector in his pre-examination schedule we consider to be satisfactorily addressed as explained in this Further Submission. Issues raised with regard to accessibility and traffic on the highway network and size of site, raised by third parties, have also been addressed in this Submission.
29. The expansion land would make a welcome contribution to the Council's stock of employment land, particularly in the rural area, creating additional jobs and business and investment opportunities.
30. We acknowledge that through the passage of time the site size of the expansion land proposed at Raleigh Hall, 6 ha, has reduced to 4.2 ha. and the boundaries of the expansion land at Raleigh Hall should be re-drawn to follow the red edging on the plan at Appendix 3 to this Submission.
31. In all respects we consider that the Plan for Stafford Borough is "sound" as it relates to the proposed Policy E4 employment allocation at Raleigh Hall.

APPENDIX 1

Enter a postcode or place name:

Other topics for this area...

Risk of Flooding from Rivers and Sea



Map legend

Click on the map to see what is the Risk of Flooding at a particular location.

Flood Maps

Flooding from rivers or sea without defences

Extent of extreme flood

Flood defences (Not all may be shown*)

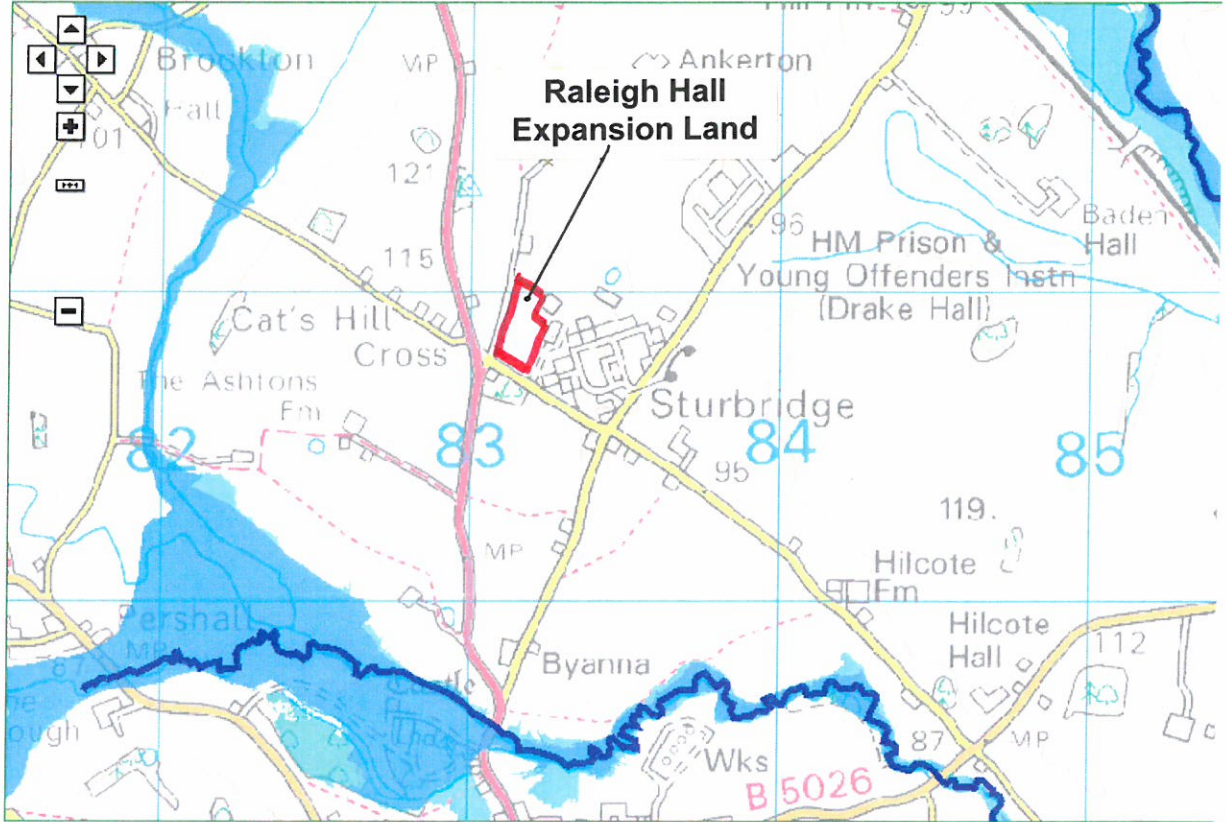
Areas benefiting from flood defences (Not all may be shown*)

Main rivers

Eccleshall, Staffordshire at scale 1:20,000

[Data search](#)

[Text only version](#)



Customers in Wales - From 1 April 2013 Natural Resources Wales (NRW) will take over the responsibilities of the Environment Agency in Wales.
 © Environment Agency copyright and database rights 2013. © Ordnance Survey Crown copyright. All rights reserved. Environment Agency, 100026380.
 Contains Royal Mail data © Royal Mail copyright and database right 2013.
 This service is designed to inform members of the public, in line with our [terms and conditions](#). For business or commercial use, please [contact us](#).

More about flooding:

Information Warning: Newport, South Wales

We are aware of problems with the flood map for the Newport area. Please contact your local Natural Resources Wales office for accurate information. We are currently working to correct this information.
[Natural Resources Wales Website](#)

Understanding the flood map

A more detailed explanation to help you understand the flood map shown above.

Current flood warnings

We provide flood warnings online 24 hours a day. Find out the current flood warning status in your local area.

Flood map - your questions answered

Answers to commonly asked questions about the flood map.

* **Legend Information:** Flood defences and the areas benefiting from them are gradually being added through updates. Please contact your [local environment agency office](#) for further details.

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Follow any figured dimensions - do not scale. IF IN DOUBT ASK.
 This drawing has been prepared for feasibility purposes and does not represent a construction plan. All design aspects to be confirmed at the appropriate detailed design stage.

● Revision History

	● Date
A	date a
B	date b
C	date c
D	date d
E	date e
F	date f
G	date g
H	date h
I	date i
J	date j

Key:

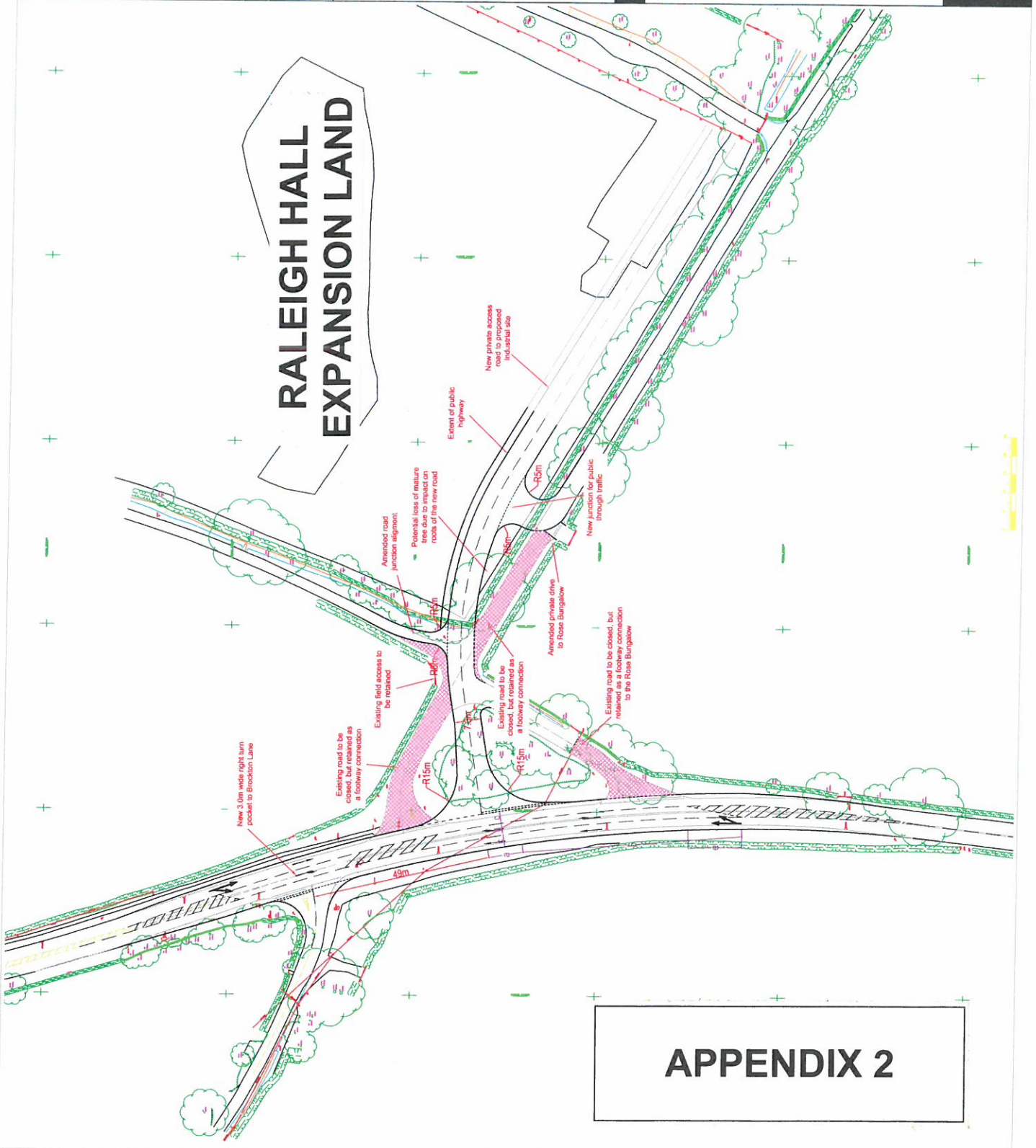
-  Area of road to be closed up and converted to public footway
-  Location of mature trees (as established by topographical survey)

Notes:

1. Proposed ghost island right turn facility has been designed to DMRB TD4295 standards, based on standards in excess of design speed of 85 kph and with lapora at a 30 gradient. The following dimensions have been applied:
 a = 3.25m through lanes (Para. 7.20)
 b = 60m deceleration length (Table 7/5a)
 c = 3.25m through lanes (Para. 7.20)
 d = 3.25m turning lane width (Para. 7.36)
 e = 15m direct lapor (Table 7/4)
2. Plans have been prepared without recourse to any information on the location of buried infrastructure services.

Client: Raleigh Hall Properties Ltd.	Scale: 1:1000 (A3)	Date: 10.09.13	Drawn by: MH	Checked: AB
Project: Raleigh Hall Site Access	Drawing number: 1431-01-SK110	Status: Information	Rev:	
Drawing title: Potential Access Arrangement Ghost Island Priority T-Junction	<p style="text-align: center;">axis</p> <p style="text-align: center;">South Manchester Office 78 Water Lane Chorley CH1 0PH 0844 870 037 - www.axisped.co.uk</p>			
planning environment design				

RALEIGH HALL EXPANSION LAND



APPENDIX 2

From: Alcock, Barry (Place) [<mailto:barry.alcock@staffordshire.gov.uk>]
Sent: 08 October 2013 14:23
To: Andrew Bell
Cc: Hurdus, Paul (Place); Enigbokan, Omololu (Place)
Subject: RE: Raleigh Hall Estate - New Access Road

Andrew,

The proposed access layout road linking onto the A519 as detailed on drawing nos: 1431-01-SK110 and 1431-01-SK111 are acceptable in principle to the Highway Authority.

Please note that if this development proposal is to be submitted as a planning application further information would be required as detailed below;

- A Transport Assessment.
- A Travel Plan.
- Detailed construction drawings, including drainage, street lighting, road markings and signage.
- Stage 1 / 2 safety audit including a designers response.

In addition to the above a section 278 agreement would be required for the construction of the proposed road junction with Staffordshire County Council.

It is noted that the submitted drawings include closing off sections of existing highway but retaining them as footway. These footway connections do not provide links to any existing footways. If the scheme is implemented these sections of closed roads would not be required as public highway and should therefore be fully stopped up.

Trusting this is the information you require.

Regards

Barry

Barry Alcock

Project Engineer
Staffordshire West Area
Local Development Projects
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383000

383500

APPENDIX 3

SJ8231 SJ8331
SJ8230 SJ8330

X 1388



Policy E4 Raleigh Hall Allocation



Net Deliverable Land 4.2 ha.

Scale 1:5000

