

Examination of the Plan for Stafford

Stone – Policies 1 and 2 – Stone Town, West and South of Stone

Hearing Statement on Behalf of Taylor Wimpey UK Ltd land interests Stone

The following sets out further submissions on behalf Taylor Wimpey UK Ltd in respect of their land interest at Stone, with specific reference to the key questions and matters relevant to their representations to the emerging Plan which are to be addressed at the Examination.

It should be read alongside a report on landscape issues prepared by EDP which is Appended.

STONE TOWN (Policies STONE 1 – 2) Key issue: *Is the development strategy for Stone Town appropriate, effective, deliverable, sustainable, fully justified and soundly based, including the overall scale and location of new housing and employment development, the strategy for the town centre, and the proposed Strategic Development Locations?*

5.1 POLICY STONE 1 – STONE TOWN:

Is the development strategy for Stone Town appropriate, effective, deliverable, sustainable, fully justified and soundly based, including:

a. Housing:

- i. The overall amount, range, type, deliverability and accessibility of proposed new housing development, including at the proposed Strategic Development Location;**
- e. Have other potential Strategic Development Locations been properly assessed?**

5.2 POLICY STONE 2 – WEST & SOUTH OF STONE

a. Is the Strategic Development Location at West & South of Stone appropriate, effective, deliverable, sustainable, viable, fully justified and soundly based, including:

- i. The overall amount, mix, location, deliverability, viability and timing of new housing development (500 houses), including affordable housing;**

c. Is the extent of the proposed allocation sufficient to deliver the scale of proposed development and the associated infrastructure?

d. Should the proposed development be delivered after 2021, in order to provide an opportunity to deliver brownfield development as part of the urban regeneration of the North Staffordshire conurbation?

Stone 1 seeks to set out policy which aims to enhance Stone's role and increase both its range and quality of services and facilities. For housing it includes providing a range of development locations for new housing and includes a Strategic Development Location to the west of Stone, suggested to minimise the impact on the surrounding landscape.

Taylor Wimpey believe that Stone can have a greater role to play in the delivery of housing within the Borough and support an increase in the level of housing proposed. This will not compromise aims to maintain a focus on Stafford as the principal, main town, but will support delivery as the town has a good residential market and strong evidence of past delivery. Taylor Wimpey seek an adjustment to the distribution of growth which seeks a greater level of provision at Stone, commensurate with its role and sustainability. (See TW's submissions regarding Policy SP4)

In addition Taylor Wimpey have a fundamental concern that the SDL identified for Stone is not the most appropriate, it has not been justified by careful landscape considerations and a better contained and landscape led site boundary would include land to the south of Eccleshall Road controlled by Taylor Wimpey. The identification of the SDL does not minimise the impact on the local landscape

as stated in the policy and the incorporation of land south of Eccleshall Road and south to Common Lane is significantly more contained within the local landscape, better related to the settlement form and if linked to a reduction in scale of the SDL north of Eccleshall Road would reduce the impact on the local landscape.

The extent of the SDL should be amended to include land south of Eccleshall Road as shown on Plan TWI (appended).

The identification of land West of Stone for an SDL is objected to in terms of its extent and landscape impact.

The site does not minimise impact on the local landscape as suggested. Appended is an analysis of the local landscape prepared by EDP Environmental Consultants. It concludes that the identification of the current SDL is not the most appropriate against reasonable alternatives. The land south of Eccleshall Road should be included as it less sensitive in landscape terms and relates better to the form of the settlement. If it resulted in a reduction in size of the current SDL on its north western limit, it would reduce landscape impact of that development, as suggested by EDP.

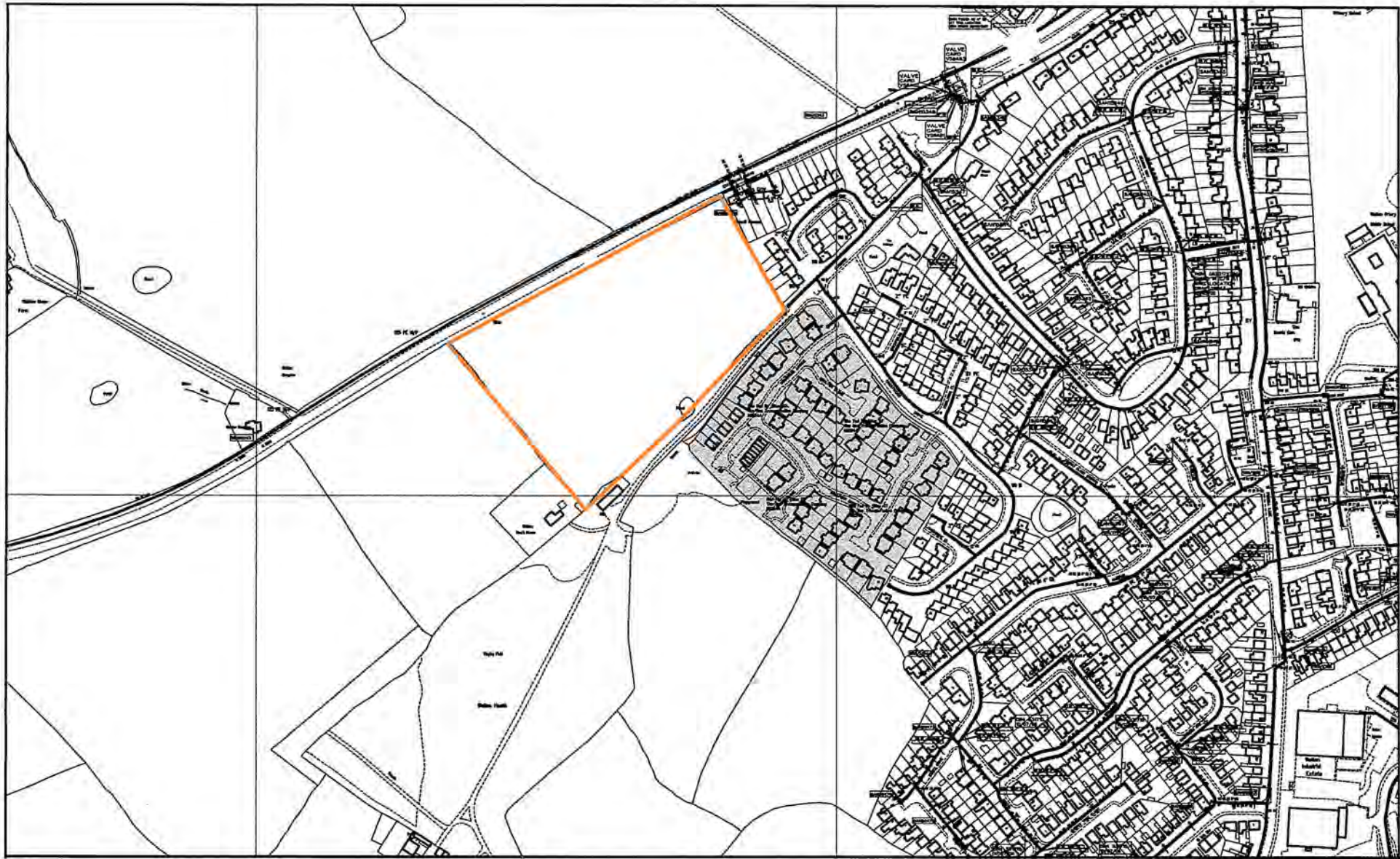
The site is deliverable now and will contribute to immediate needs and shortfalls in land for housing supply. It represents a logical phase of the SDL and has no impediments to delivery; the site is not within an area at risk of flooding (moreover the proposals for the site include a site drainage strategy which would reduce surface run off from the site during peak rainfall events which would benefit local flood risk); there are no physical constraints; the site can be accessed safely direct from Eccleshall Road and with no conflict with access to the wider SDL to the north; there are no ecological constraints; no landscape constraints; the site is not in a Conservation Area, nor are there any adverse impacts on listed buildings; there are no Tree Preservation Orders; and there are a good range of services nearby with, additionally, public transport adjacent to the site.

Taylor Wimpey have already undertaken a community consultation event to understand local views on this logical phase of development with very little adverse comments, providing access was taken direct from Eccleshall Road. Representations promoting the merits of the site for residential development have been made at a previous stage of the Plan and the site has been included in the SHLAA. A planning application is shortly to be submitted and appended is the current indicative masterplan.

The Plan for Stafford should allocate land south of Eccleshall Road on Plan TW I for residential development of around 100 dwellings as phase of the wider SDL. The allocation of this site would amount to a viable and deliverable development to assist with early delivery within the plan period.

The site's allocation raises no inconsistency with the SEA or would amount to any alternative conclusions to the soundness of the plan if this extended SDL allocation was to be included.

APPENDIX I – PLAN TW I



Plan TW 1 - Land at Common Lane/Eccleshall Road, Stone

APPENDIX 2 – ILLUSTRATIVE MASTERPLAN




- Site boundary (3.74ha)
- Houses
- Landscape
- LEAP (400sqm)
- Gardens
- Drainage pond / SUDS
- Existing pond
- Shared surface / driveway
- Trees
- Pedestrian access
- Repositioned mile post

Landscape breakdown:

Public open space: 0.76ha
 Buffer amenity space: 0.26ha
 SUDS area: 0.09ha

Rev	Description	Date



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 33 Holmfield Road
 Stonegate
 Leicester
 LE2 1SE

Development:
STONE

Drawing Ref:
ILLUSTRATIVE MASTERPLAN

Date: 28.08.2013	Scale: 1:250@A3	Drawn: KK
Job Ref: TW-STONE	Ref: 002/8	

APPENDIX 3 – EDP LANDSCAPE STATEMENT

Examination of the Plan for Stafford

Hearing Statement in Consideration of the Landscape Implications of Policy Stone 1 and Policy Stone 2

Prepared by:
**The Environmental
Dimension Partnership
(EDP)**

On behalf of:
Taylor Wimpey Ltd

October 2013
Report Reference
EDP1086_10a



THE
ENVIRONMENTAL
DIMENSION
PARTNERSHIP

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Appendix EDP 3	Hallam Application Site and Illustrative Masterplan
Appendix EDP 4	Taylor Wimpey Site and Illustrative Masterplan
Appendix EDP 5	Photo Viewpoint 8 from FPCR Landscape Report

Photoviewpoints

Photoviewpoint EDP 1	Photomontage showing both SDL and TW sites taken from Eccleshall Road (EDP1086/22 09 October 2013 TB/WB)
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For EDP use	
Report no.	L_EDP1086_10a
Author	Will Brown
2 nd Read	Ben Rosedale
Formatted	Audrey Vuvi
Proofed	Martina Vincent
Proof Date	11 October 2013

This report is intended for electronic viewing only

Section 1 Introduction

Aims of the Statement

- 1.1 The purpose of this statement is to provide an evaluation of the soundness of the Draft Policy Stone 1 and Policy Stone 2 within the Plan for Stafford Submission Document in respect of landscape matters.
- 1.2 The statement specifically considers whether the Strategic Development Location (hereafter referred to as the 'SDL') to the west of Stone represents the most appropriate location, against reasonable alternatives, for new housing and examines the statement within Policy Stone 1, that it '*will minimise the impact on surrounding landscapes*'.
- 1.3 The Environmental Dimension Partnership (EDP) has been instructed to produce this statement by Taylor Wimpey Ltd, who are promoting the allocation of land south of Eccleshall Road, Stone for housing (shown in **Appendix EDP 4** and hereafter referred to as the 'the TW site').
- 1.4 Consideration is given to the recently submitted planning application at Walton Hill, Stone (Ref: 13/19002/OUT) by Hallam Land Management Ltd (hereafter referred to as the 'Hallam application') and the supporting information.
- 1.5 The statement:
 - provides a comparison of the key landscape character and fabric attributes of the SDL, Hallam and TW sites;
 - evaluates the landscape impacts which would arise from their development; and
 - considers which site (or combination of sites) is most suitable in terms of its capacity to accommodate new development into the landscape.

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Section 2 Description of Sites

Location of the sites

- 2.1 The location of the SDL is shown on the 'Stone Area Inset'. It is situated north of Eccleshall Road on the western edge of Stone and is currently occupied by arable and pasture fields bordered by Eccleshall Road to the south, Micklow Wood to the west and residential housing along Longhope Drive to the east.
- 2.2 The Hallam application land is shown in **Appendix EDP 3**. The site boundary incorporates the entirety of the SDL in its southern half with an additional area of land extending northwards to the Colwich to Manchester railway line and including the Filly Brook.
- 2.3 The TW land lies directly opposite the SDL to the south of Eccleshall Road. It consists of a single improved pasture field bordered by agricultural land to the west, Common Lane to the south and residential housing to the east. The site boundary and illustrative masterplan is shown in **Appendix EDP 4**.

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Section 3

Evaluation of Sites in Relation to Evidence Base and Policy

- 3.1 Policy Stone 1 of the Plan for Stafford justifies the selection of the SDL on the basis that it will '*minimise the impact on surrounding landscapes*'. However, there appears to be no justification provided to support this assertion.
- 3.2 The Council have submitted 'Planning for Landscape Change' (Documents D38/39) as their landscape evidence; this formed the Staffordshire Landscape Character (LCA) assessment for the revoked Staffordshire Structure Plan. The document is somewhat outdated, published in 2001 prior to the national guidance on landscape character assessment¹. Nonetheless, it contains a useful description of the local landscape and the pressures for change. However, there is no indication as to how the Council have used the LCA to inform the selection of the SDL at a district level.
- 3.3 Whilst it is acknowledged that land to the west of Stone is the most preferable location for strategic housing comparative to locations north, south and east, the justification for allocation of land north of Eccleshall Road on landscape grounds is lacking. In fact, there are strong arguments to favour inclusion of land to the south of Eccleshall Road within the SDL as set out in this statement.
- 3.4 The sites considered in this statement are all contained within the 'Settled Farmlands' landscape type in the LCA. The key characteristics of this landscape are the mixed arable and pasture fields with a strong pattern of hedgerows and mature boundary trees. Deterioration of landscape character has occurred through hedgerow loss.
- 3.5 Document D37 is an Ecological Desk Study² which identifies potential ecological constraints to development. The area north of Eccleshall Road occupied by the SDL is referred to as SN-4 and contains two Sites of Biological Importance (SBI): Micklow Wood SBI and Filly Brook SBI. The location of these sites is shown in **Appendix EDP 2**. The area to the south of Eccleshall Road occupied by the TW land is referred to as SN-3 and contains no designated sites.

¹ Countryside Agency (2002), Landscape Character Assessment: Guidance for England and Scotland

² Staffordshire Wildlife Trust (2008), Stafford Borough Local Development Framework Ecological Desk Study

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Section 4 Evaluation of Sites in Terms of their Landscape Impacts

Landscape Fabric and Biodiversity

- 4.1 It is being argued that the boundaries of the SDL should be extended to include either land north of the current site (by Hallam Land Management Ltd) or south of Eccleshall Road (by Taylor Wimpey Ltd). It is the view of both parties that the existing SDL is not large enough to accommodate the delivery of the policy for 500 new homes³.
- 4.2 The SDL alone could not be developed whilst meeting the policy aspiration to reduce its landscape impact, protect Micklow Wood SBI and provide a green infrastructure network. This is because the site contains a network of mature hedgerows and trees, a mature tree avenue and Micklow Wood SBI on its western edge. These are valuable landscape features which should be retained with sufficient offset space to buffer them from potentially negative effects of development. In many respects, the Hallam application illustrates the inadequacies of Policy Stone 1 as a result of the impacts on existing natural heritage.
- 4.3 Due to the inadequate size of the SDL, the issue becomes whether the landscape to the north (extending to the railway) or to the south (across Eccleshall Road) has capacity to support further housing development. **Appendix EDP 1** provides a comparison of landscape attributes and considers the potential impacts of these two options.
- 4.4 The Hallam scheme proposes the extension of development to the railway and, whilst the railway represents a logical boundary to development, the northern land contains a higher number of valuable and sensitive landscape features. These include the Filly Brook SBI, a hedgerow network (some of which are species-rich) and areas of species-rich wet grassland.
- 4.5 The reports supporting the Hallam application⁴ do not acknowledge the presence of the two SBIs. No surveys appear to have been conducted to assess whether the hedgerows qualify as 'Important' under the Hedgerow Regulations 1997, and the lack of information on protected species has been criticised by Staffordshire County Council⁵.
- 4.6 The development layout shown in **Appendix EDP 3** would result in significant hedgerow loss (c. 500m) including the hedgerows connecting to the Filly Brook, a section of species-rich hedgerow and 4 mature avenue trees. Hedgerow removal would result in negative impacts to the landscape fabric through field amalgamation and boundary alterations. The site includes several small-scale fields with irregular boundaries

³ Representations for Examination of Plan for Stafford

⁴ FPCR (June 2013) Walton Hill, Stone, Landscape and Visual Appraisal and FPCR (2013) Walton Hill, Stone, Ecological Appraisal

⁵ Staffordshire County Council consultation response to 13/19002/OUT dated 22 August 2013

which would be inherently more difficult to accommodate with large-scale housing development.

- 4.7 In contrast, the TW land to the south of Eccleshall Road comprises a single rectilinear pasture field with a simple landscape fabric. There are no sensitive landscape features or SBIs and the hedgerows and trees are located around the perimeter of the site and will be largely retained within the development (see **Appendix EDP 4**).

Visual effects

- 4.8 It is acknowledged that the northern part of the Hallam application land has good visual containment from the surrounding landscape through a combination of topography, vegetation and the railway.
- 4.9 However, housing development on the southern section of the SDL would have a greater visual prominence than the TW land as it lies on raised ground in relation to Eccleshall Road and Longhope Drive to the east.
- 4.10 To the east, direct unfiltered views of the proposals would be experienced from the primary living space of several properties with development appearing on raised ground above the skyline, thereby negatively changing the existing view. This can be seen in Photoviewpoint 8 of the landscape report (**Appendix EDP 5**).
- 4.11 From the southwest, along Eccleshall Road, the proposed housing would rise above the horizon and would be seen as 'skyline' development. This effect would be apparent despite proposals to create a woodland buffer along the western boundary. In contrast, development on the lower land to the south of the Eccleshall Road would not rise above the skyline and would be viewed as an extension of the existing settlement edge. The difference between the sites, as viewed from Eccleshall Road, is illustrated in **Photoviewpoint EDP 1**.

Section 5 Conclusions and Recommendations

- 5.1 The boundaries for the SDL are overly prescriptive and insufficient to accommodate the required numbers of housing without compromising its existing landscape fabric and biodiversity value. The selection of the SDL has not been informed by robust interpretation of local landscape features and is therefore unsound.
- 5.2 Relative to the TW site, the SDL and Hallam land contain a higher number of valuable landscape features including two SBIs, mature trees and hedgerows which would be negatively impacted by development. The TW land contains comparatively few sensitive landscape features with development achieved without disrupting the existing field pattern. In contrast to the SDL, new housing on the TW site would not break the skyline and would be viewed against the backdrop of the existing settlement edge.
- 5.3 For these reasons, the current SDL (and Hallam land) cannot be claimed to 'minimise the impacts on surrounding landscapes' due to negative impacts on the existing landscape resource which run the risk of contradicting policies in the National Planning Policy Framework (NPPF) and the emerging Plan for Stafford.
- 5.4 By amending the SDL boundaries to include land south of Eccleshall Road, the allocation would meet the requirement of the NPPF to '*minimise the impact on biodiversity*'⁶ and for plans to '*allocate land with the least environmental or amenity value*'⁷. It would enable the allocation to meet the Policy N4 to reverse habitat fragmentation, Policy N5 to protect SBIs and Policy N8 to conserve the '*pattern of landscape elements such as woodland, streams, hedgerows, trees and field boundaries*'⁸. Having fully considered all reasonable alternatives, this would thereby make the plan sound in that it would represent the most appropriate SDL.

⁶ Paragraph 109 of the NPPF

⁷ Paragraph 110 of the NPPF

⁸ Draft policies in the Plan for Stafford 2013 Submission Document

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Appendix EDP 1
Table Comparing the Landscape Characteristics and Impacts
of the Hallam and TW Sites

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Landscape attribute	SDL plus land to the north (Hallam Application)	Landscape Implications of this Proposal	Taylor Wimpey Land	Landscape Implications of this Proposal
Landscape Character Type	Settled Farmlands in Staffordshire Landscape Character Assessment.	Alteration of landscape character at site level from farmland to residential.	Settled Farmlands in Staffordshire Landscape Character Assessment.	Alteration of landscape character at site level from farmland to residential.
Size and Land Use	33ha containing mixed arable and grazed pasture with brook, hedgerows, trees and woodland copses.	Change of land use to residential and open space.	3.74ha containing improved cattle-grazed field with hedgerows and trees around perimeter.	Change of land use to residential and open space.
Topography	Difference of c. 30m between lowest point along Filly Brook in northeast and highest point near Micklow Wood. Difference of c. 20m between Longhope Drive and Micklow Wood.	Development on raised topography on south of site creates skyline development and prominence in views from points along Longhope Drive and Eccleshall Road.	Difference of c. 7m between lowest point at 106m in southeast corner and highest at 113m in northwest.	The difference between the site and surrounding land is not sufficient to create potential for skyline development.
Access	No public access within site boundary or public rights of way and access land within immediate surrounding area. Walton Heath Common c. 250m to south.	Distant and filtered views from Walton Heath Common.	No public access within site. Common Lane on southern boundary is a public bridleway. Walton Heath Common which is access land adjacent to southwest corner.	No direct impacts. Heavily filtered views of site from bridleway from intervening tree cover. Filtered views from Walton Heath Common.
Field size and Pattern	Site consists of 12 fields ranging from small to medium-scale. Several field with irregular boundaries due to presence of brook and woodland.	Changes to size and shape of several field boundaries as a result of loss of field boundaries. Field south of Filly Brook lost through amalgamation.	Site consists of a single medium-scale field which is a regular rectilinear shape.	No changes to field size or shape as development contained within it.
Existing Watercourses and Ponds	Filly Brook (local wildlife site) runs along northern section of site. No ponds identified in Ecological Assessment.	Filly Brook retained although in close proximity to residential development. Loss of habitat connectivity through removal of two hedgerows south of Filly Brook.	Small field pond on southern boundary and damp patches in centre of field.	Small field pond retained.
Hedgerows	No hedgerow survey conducted. Estimated (from Phase 1 Habitat Plan) that c. 17 hedgerows including internal hedge network. Several species-rich hedgerows noted .	No clear quantification of hedge loss but estimated that amounts to c. 500m including loss of 2 hedgerows which connect to Filly Brook.	5 species-poor hawthorn hedgerows along northern, eastern and western site boundaries. No internal hedgerows.	Removal of c. 200m of species-poor hedgerow adjoining Eccleshall Road to implement construction of the highway access.
Trees	38 individual trees and 16 tree groups including a mature tree avenue through the centre of the southern half of the site between Eccleshall Road and Walton Hill Farm.	Loss of <ul style="list-style-type: none"> x4 grade 'B'trees from TG15 (mature avenue); x2 Grade 'C' trees from TG16; and x5 Grade 'C' trees from TG12. 	22 individual trees, 4 tree groups and 5 hedgerows. All but one tree located along site boundaries.	All trees retained except 2 'C' grade trees adjoining Eccleshall Road requiring removal to implement construction of the highway access.
Landscape and Ecological Designations	No landscape designations. Two Local Wildlife Sites (Sites of Biological Importance) within site boundaries: Micklow Wood SBI and Filly Brook SBI. Sites not acknowledged within Ecological Assessment.	Retention of Local Wildlife Sites but potential for indirect negative impacts including disturbance and habitat fragmentation. No assessment of impacts contained in Ecological Assessment.	No landscape or ecological designations.	No impacts.

Appendix EDP 1

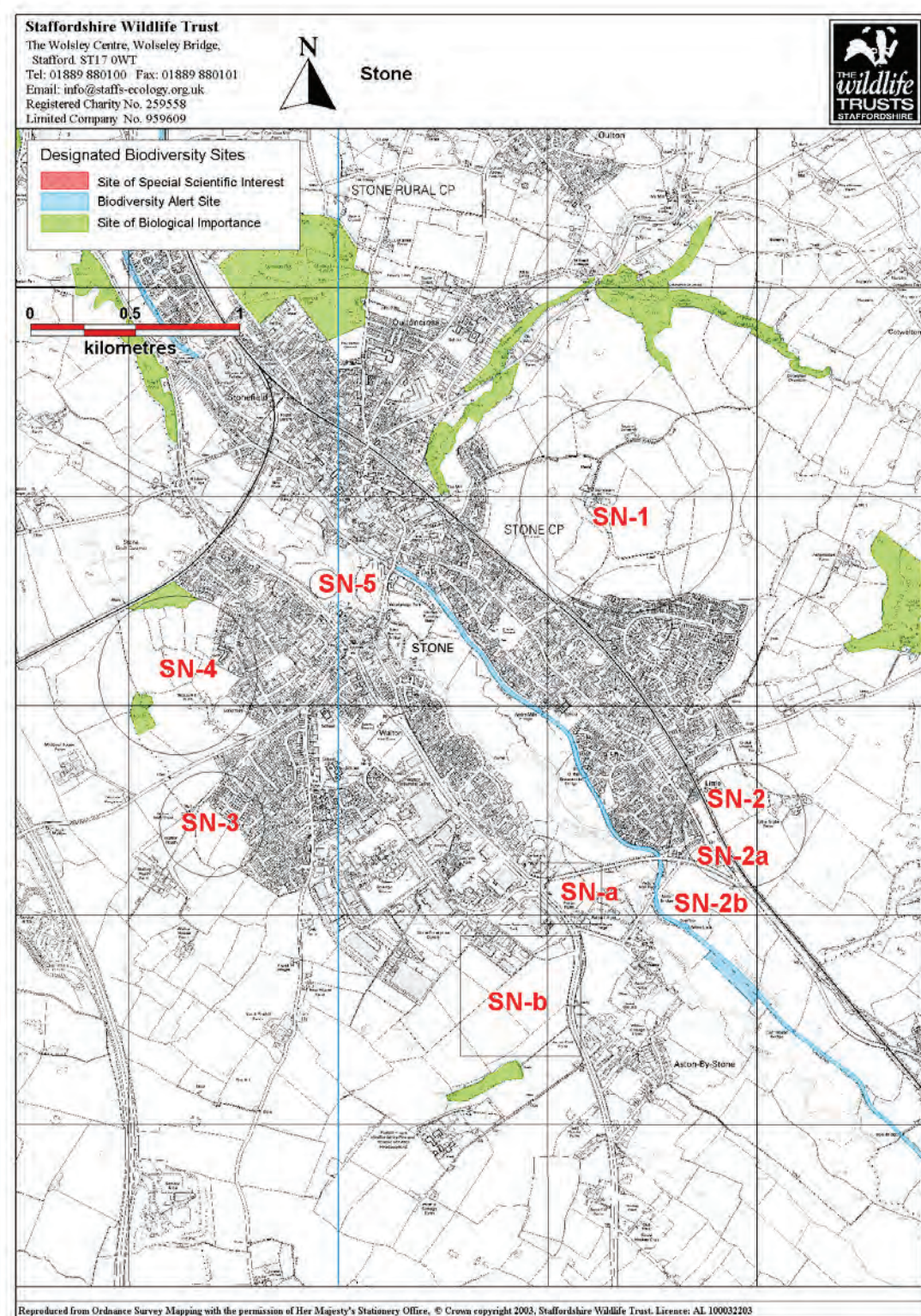
Table Comparing the Landscape Characteristics and Impacts of the Hallam and TW Sites

Appendix EDP 2 Ecological Desk Study and Location of Sites of Biological Interest

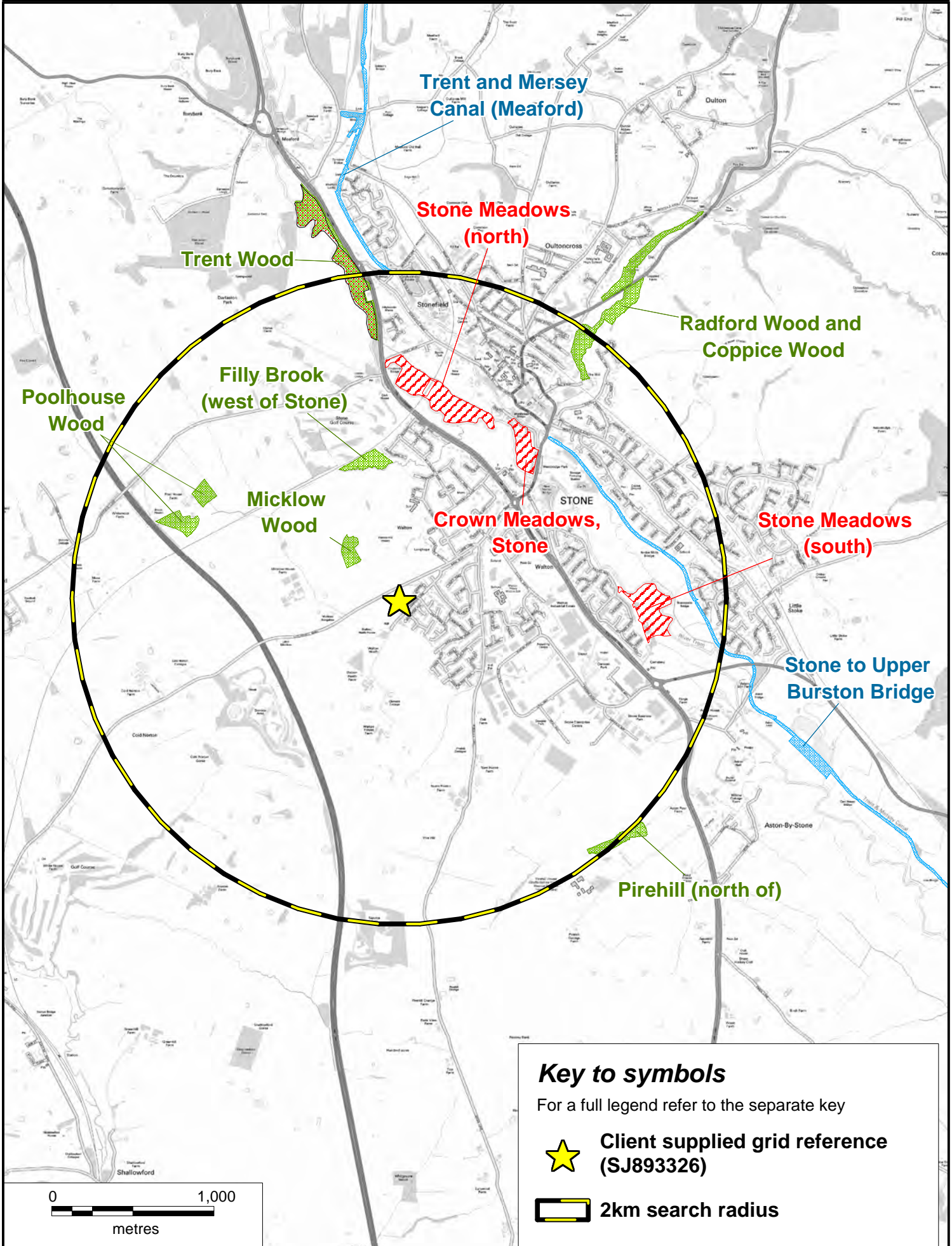
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10 Stone

7.1 Map of Potential Housing & Employment development Sites



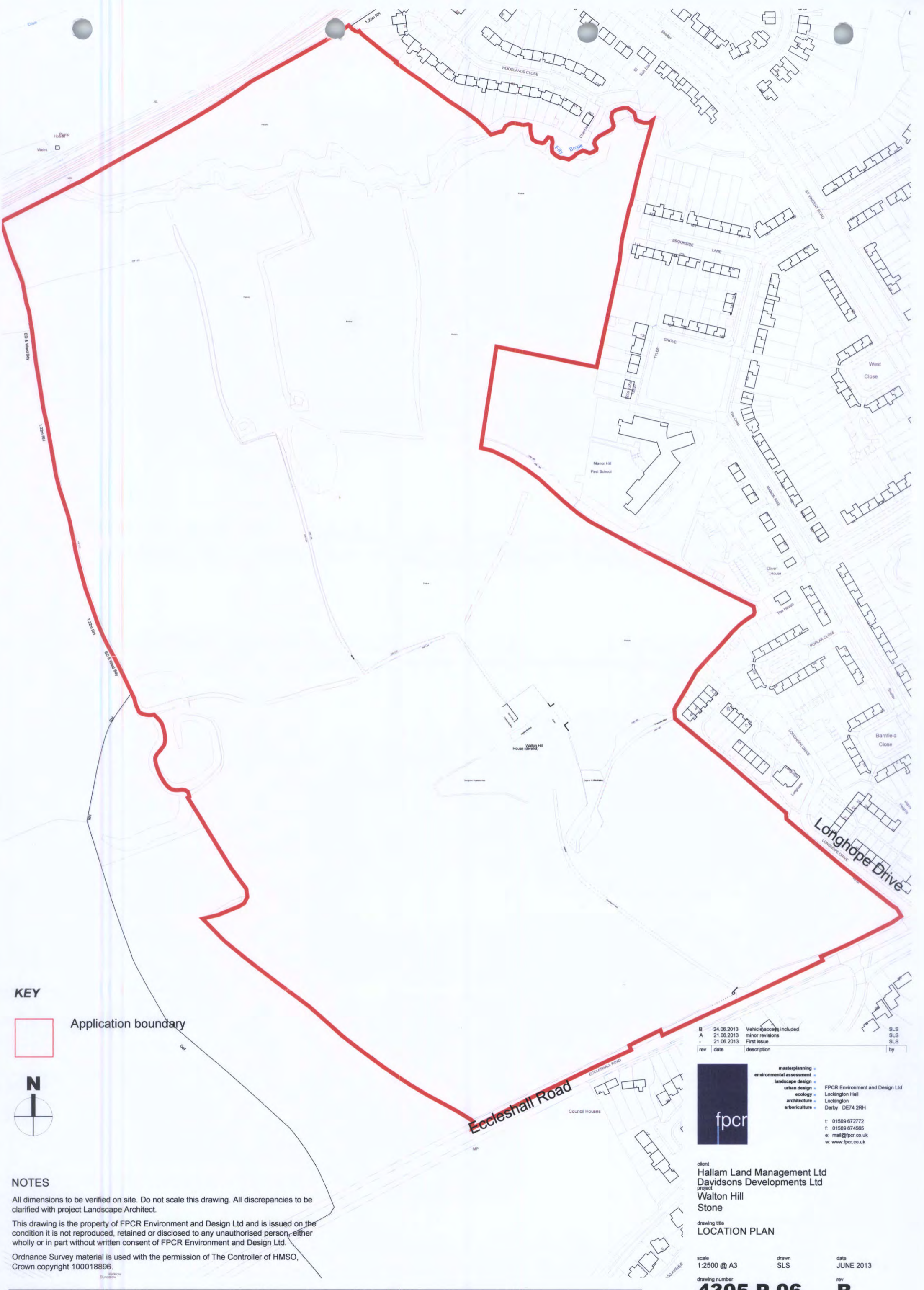
Nature Conservation Sites within a 2km radius of Land off Eccleshall Road, Stone (SJ893326)



Appendix EDP 3

Hallam Application Site and Illustrative Masterplan

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KEY

 Application boundary



NOTES

All dimensions to be verified on site. Do not scale this drawing. All discrepancies to be clarified with project Landscape Architect.

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rev	date	description	by
B	24.06.2013	Vehicle access included	SLS
A	21.06.2013	minor revisions	SLS
-	21.06.2013	First issue	SLS

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- masterplanning
- environmental assessment
- landscape design
- urban design
- ecology
- architecture
- arboriculture

FPCR Environment and Design Ltd
Lockington Hall
Lockington
Derby DE74 2RH

t: 01509 672772
f: 01509 674565
e: mail@fpcr.co.uk
w: www.fpcr.co.uk

client
Hallam Land Management Ltd
Davidsons Developments Ltd
Walton Hill
Stone

drawing title
LOCATION PLAN

scale
1:2500 @ A3

drawn
SLS

date
JUNE 2013

drawing number
4305-P-06

rev
B
















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KEY

-  Site boundary (33.07ha)
-  Proposed residential development area (15.80ha)
500 dwellings @ 32/ha average
-  Proposed footpath / cycleway
-  Proposed Green Infrastructure (17.27ha)
-  Structural woodland planting
-  Existing watercourse / drainage route retained
-  Indicative attenuation
-  Retained trees, woodland and hedgerows
(Blue outline denotes Tree Protection Area, refer to FPCR Tree Survey)
-  Trees recommended for removal in the interest of good management
(refer to FPCR Tree Survey)
-  Trees and hedgerows to be removed to facilitate the development
-  Indicative bus loop

rev	date	description	by
F	24.06.2013	minor boundary amendments	SLS
E	19.06.2013	School labelling amended	SLS
E	30.05.2013	amendment to footpath connections / minor amends	SLS
E	17.04.2013	indicative bus loop added	SLS
D	18.04.2012	amendment to footpath connections	SLS
C	14.03.2012	minor tweak to layout	SLS
B	09.03.2012	Minor amendments to layout	SLS
A	17.02.2012	Revised to accommodate drainage & access proposals	SLS
-	30.01.2012	First issue	SLS

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FPCR Environment and Design Ltd
 Lockington Hall
 Lockington
 Derby DE74 2RH

t: 01509 672772
 f: 01509 674565
 e: mail@fpcr.co.uk
 w: www.fpcr.co.uk

client
Hallam Land Management Ltd
Davidsons Developments Ltd
 project
Walton Hill
Stone

drawing title
DEVELOPMENT FRAMEWORK PLAN

scale
 NOT TO SCALE @ A3

drawn
 SLS

date
 24 June 2013

drawing number
4305-P-02

rev
F





KEY

	Site Boundary		Proposed Vegetation		Sports Provision		Locally Equipped Area of Play (LEAP)		Existing Contours
	Existing Vegetation		Residential		SUDs		Pedestrian Routes		Bus Route

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ILLUSTRATIVE MASTERPLAN

Not to Scale @ A1
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fpcr
 fpcr Environment and Design Ltd
 Lockington Hall
 Lockington
 Derby DE74 2RH
 t: 01509 672772
 f: 01509 674665
 e: mail@fpcr.co.uk
 w: www.fpcr.co.uk

Appendix EDP 4 Taylor Wimpey Site and Illustrative Masterplan


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- Site boundary (3.74ha)
- Houses
- Landscape
- LEAP (400sqm)
- Gardens
- Drainage pond / SUDS
- Existing pond
- Shared surface / driveway
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 Buffer amenity space: 0.26ha
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Rev	Description	Date



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Creating a sense of place

Node Urban Design Ltd
33 Holmfield Road
Stoneygate
Leicester
LE2 1SE

Development:
STONE

Drawing Ref:
ILLUSTRATIVE MASTERPLAN

Date: 28.08.2013	Scale: 1:250@A3	Drawn: KK
Job Ref: TW-STONE	Ref: 002/8	

Appendix EDP 5
Photo Viewpoint 8 from FPCR Landscape Report

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PHOTO VIEWPOINT 7: View north from Eccleshall Road



PHOTO VIEWPOINT 8: View west from Longhope Drive



Hallam Land Management Ltd
Walton Hill House Farm,
Stone, Staffordshire

PHOTO VIEWPOINTS 7 & 8

NTS @ A3

MST / SLS

March 2012

Figure 11

Photoviewpoints

Photoviewpoint EDP 1 Montage showing both SDL and TW sites taken from Eccleshall Road
(EDP1086/22 09 October 2013 TB/WB)

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SDL Land

Eccleshall Road

TW site at Common Lane



Photoviewpoint EDP 1: Montage showing both SDL and TW site taken from Eccleshall Road.

 THE ENVIRONMENTAL DIMENSION PARTNERSHIP 14 Inner Courtyard, Whiteway Farmhouse, The Whiteway, Cirencester GL7 7BA t 01285 640640 f 01285 652545 e info@edp-uk.co.uk www.edp-uk.co.uk		client	project title
		Taylor Wimpey Ltd	Common Lane, Stone, Staffordshire
		date	09 OCTOBER 2013
		drawing number	EDP1086/22
		scale	nts
		drawn by	TB
		checked by	WB
		drawing title	Photoviewpoint EDP 1



THE
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CIRENCESTER (Head Office)

The Environmental Dimension Partnership
14 Inner Courtyard, Whiteway Farmhouse,
The Whiteway, Cirencester,
Gloucestershire GL7 7BA
t 01285 640640 f 01285 652545
e info@edp-uk.co.uk

www.edp-uk.co.uk

SHREWSBURY

The Environmental Dimension Partnership
Rural Enterprise Centre
Battlefield Enterprise Park
Shrewsbury, Shropshire SY1 3FE
t 01743 454960 f 01743 453121
e info@edp-uk.co.uk



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