

Land at Falmouth Avenue, Stafford- Application 14/20448/OUT

Number	Location	Application Number	Decision	Decision Notice	Location Plan
1	Land at Falmouth Avenue, Stafford	14/20448/OUT	Refuse	Yes	21284 – PL[0]23



Staffordshire County Council
C/O Turley
9 Colmore Row
Birmingham
West Midlands
B3 2BJ

Date Registered 14 May 2014
Decision Date 11 August 2014
Issue Date 11 August 2014

FAO Mrs Karin Hartley

TOWN AND COUNTRY PLANNING ACT 1990

REFUSAL OF PERMISSION FOR DEVELOPMENT

Application No:	14/20448/OUT
Proposed Development	Outline planning application for a residential development of up to 97 dwellings, vehicular and pedestrian accesses, landscaping, infrastructure and associated works. Details of new vehicular access from Falmouth Avenue submitted for approval
Location	Land At Falmouth Avenue Stafford Staffordshire
O. S. Reference:	395334 321900

Stafford Borough Council, in pursuance of powers under the Town and Country Planning Act, hereby refuse the above development in accordance with the accompanying plans and subject to the following reasons:-

1. The Council can demonstrate a 5 year supply of housing land, including a 20% buffer. The Plan for Stafford Borough demonstrates that for the plan period objectively assessed housing need can be fully met in accordance with the National Planning Policy Framework. Sufficient housing land is identified in the Strategic Development Locations delivered by Policy Stafford 2, Policy Stafford 3 and Policy Stafford 4, in the Plan for Stafford Borough to meet the requirements of Stafford town. The Council has more appropriate, viable and deliverable land available for housing so that the less preferable application site is not required. This application is a substantial residential proposal that lies outside the identified Strategic Development Locations and the proposed development strategy, and is contrary to the Plan for Stafford Borough. Although it is recognised that an element of provision will occur on brownfield sites within the existing urban area, the application site is

Stafford Borough Council

Civic Centre, Riverside, Stafford, ST16 3AQ, DX 723320, Stafford 7
REFLZ
TEL 01785 619 000
EMAIL info@staffordbc.gov.uk
WEB www.staffordbc.gov.uk



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located on a greenfield site and as such the proposal is contrary to Spatial Principle SP7, which states that only where insufficient sites on previously developed land in sustainable locations are available to meet development requirements should greenfield sites be released. In such a setting, particularly taking account of the topography of the land, the proposed development would constitute a significant intrusion into open countryside with an unacceptable adverse visual impact, detracting from the character and appearance of the surrounding area, with a loss of visual amenity. Development of the nature proposed would inevitably conflict with Policy N1 (f), (g) and (h) in The Plan for Stafford Borough and would be contrary to paragraph 17 of the National Planning Policy Framework.

Head of Planning and Regeneration
On behalf of the Council

Stafford Borough Council

Civic Centre, Riverside, Stafford, ST16 3AQ, DX 723320, Stafford 7
TEL 01785 619 9600 FAX 01785 619 9601
EMAIL info@staffordbc.gov.uk
WEB www.staffordbc.gov.uk



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Services Through Partnerships*
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*Raising economic prosperity
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Application	14/20448/OUT	Case Officer:	John Dolman
Date Registered	14 May 2014	Target Decision Date	13 August 2014
Address	Land at Falmouth Avenue Stafford	Ward	Baswich
Proposal	Outline planning application for a residential development of up to 97 dwellings, vehicular and pedestrian accesses, landscaping, infrastructure and associated works. Details of new vehicular access from Falmouth Avenue submitted for approval		
Applicant	The R P Ward Estate and Staffordshire County Council		
Recommendation	Refuse		

REASONS FOR REFERRAL TO COMMITTEE

This application has been called in by Councillor Trainor and Councillor Edgeller (Ward Members for Baswich) for the following reason:-

"Impact on highway network and other infrastructure. Loss of public amenity space".

Context

This is an outline application for the construction of up to 97 houses on an existing open land on the north-eastern side of Falmouth Avenue. The site is bounded by open land to the north-west with houses on Bude Drive and Hayle Close beyond, by open space to the north-east with the main West Coast Railway Line beyond, by existing houses on Falmouth Avenue and Falmouth Close to the south-east and by existing houses to the south-west on the opposite side of Falmouth Avenue.

Submitted with this application are: a Design and Access Statement; Supporting Planning Statement; Flood Risk Assessment; Transport Assessment; Travel Plan; Ground Investigation Report; Noise Assessment; Gas Risk Assessment; Arboricultural Report; Ecological Survey Report; Badger Survey; Draft Section 106 Agreement; and a Statement of Community Engagement. An assessment of pertinent newly adopted planning policy considerations has also been submitted following the adoption of The Plan for Stafford Borough.

A Parameters Plan is also submitted with the application, which indicates a number of proposed development areas served off three roadways with retained areas of proposed public open space principally in the centre of the site with smaller areas on some of the edges of the site.

Access details are submitted for approval at this stage. These comprise three access points onto Falmouth Avenue, opposite 33/35 Falmouth Avenue to the south, 49/51 in a more central location along the site frontage and opposite 65/67 towards the northern most part of the site frontage. All three accesses include 6 m kerb radii, a 5 m wide carriageway and 2 m wide footways.

Officer Assessment - Key Considerations

1. Housing Policy

The proposed development is on a greenfield site adjacent to the Stafford Town area. The development of the site for housing would, therefore, need to be in line with Spatial Principle 7 of the Plan for Stafford Borough. Paragraph 49 of the NPPF states:- "Housing applications should be considered in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five year supply of deliverable housing sites." The Council has to show a 5 year + housing land supply to meet the requirements of the National Planning Policy Framework (NPPF) which is set out by the housing provision within the Plan for Stafford Borough. The Council can currently demonstrate a 5 year supply of housing land, including a 20% buffer, in the context of the Plan for Stafford Borough.

This emphasis is also made in a core planning principle (paragraph 17 of the NPPF) to proactively drive and support sustainable economic development to deliver homes that the country needs, as well as encourage the re-use of existing resources, including conversion of existing buildings. Furthermore paragraph 9 states that pursuing sustainable development involves widening the choice of high quality homes.

The Stafford Town area is identified in the Plan for Stafford Borough to accommodate 70% of the overall housing requirements for the Borough over the Plan period, totalling 7,000 new houses. The majority of this housing requirement will be delivered by the Strategic Development Locations at Stafford Town, although it is recognised that an element of provision will occur on brownfield sites within the existing urban area.

As previously stated the Council can demonstrate a 5 year supply of housing land, including a 20% buffer, and sufficient housing land is identified in the Strategic Development Locations in the Plan for Stafford Borough to meet the requirements of Stafford Town. The Plan for Stafford Borough has demonstrated that, for the plan period, objectively assessed need can be fully met. The proposal is therefore contrary to Policy Stafford 1 - Stafford Town, of the Plan for Stafford Borough and the plan-led approach established in paragraph 17 of the National Planning Policy Framework.

While a number of other factors and considerations will need to be taken into account, there is no policy justification for the proposed development on a green field site outside of the Stafford Town area.

The applicants have submitted a detailed assessment as to the impact of newly adopted housing policies relevant to the application. They point out that prior to the establishment of Settlement Boundaries, proposals for housing development should be assessed against 12 principles set out in Spatial Principle 7 (SP7) to assess the acceptability of individual proposals at the Settlements. The applicants claim that the application site performs well when considered against all these criteria. SP7, however, also clearly states, separate from these principles, that development proposals should maximise the use of brownfield redevelopment sites within the towns and villages to reduce the need for greenfield sites and that only where insufficient sites on previously developed land in sustainable locations are available to meet new development requirements should greenfield sites be released.

The applicants point out that The Plan for Stafford Borough acknowledges that new residential development will need to be provided outside of the existing built up areas of Stafford and that accordingly three strategic greenfield development locations have been allocated around Stafford. They also dispute the Council's claim that a 5 year housing land supply exists. In such circumstances they claim that the application proposal is deliverable within 5 years and will make an important contribution to housing supply and to achieving a 5-year land supply position.

It has already been stated in this Report that a five year supply of housing land exists. It is also acknowledged that in order to meet housing requirements a number of greenfield sites will need to be developed. The three Strategic Development Locations to the North, West and East of Stafford were identified through the plan process. The Development Strategy, including the principle of the key Strategic Development Locations around Stafford and around Stone, were found to be sound, deliverable, viable, effective and fully justified with robust and comprehensive evidence by the Local Plan Inspector and are included in The Plan for Stafford Borough as adopted. Consequently the majority of housing requirements for Stafford Town will be delivered by the Strategic Development Locations, with the remaining provision on brownfield sites within the existing urban area. There is no justification, therefore, for developing additional greenfield sites such as this on land outside the existing built-up area. The proposal is clearly contrary to relevant policies contained in The Plan for Stafford Borough.

Policies and Guidance:-

National Planning Policy Framework (NPPF) - Paragraphs 9, 17 (Core Principles), 47, 49 (Section 6 - Delivering a wide choice of high quality housing, 210, 211, 212, 213, 214, 215, 216 (Annex 1: Implementation)

The Plan for Stafford Borough - SP1 -Presumption in Favour of Sustainable Development, SP2 - Stafford Borough Housing &Employment Requirements,

SP3 - Stafford Borough Sustainable Settlement Hierarchy, SP4 - Stafford Borough Housing Growth Distribution, SP7 - Supporting the Location of New Development, Policy Stafford 1 - Stafford Town, C5 Residential Proposals outside the Settlement Hierarchy

2. Impact on Character of Area and on Open Countryside

The application site comprises open greenfield land and although close to the existing built-up area lies beyond existing development.

While the public at present has access to this land, its status is disputed, with local residents at present seeking through formal application to have the land designated as Village Green, which if successful would protect the land from development such as that now proposed. The current application, however, must be determined only in light of relevant material planning considerations. The attempt to confer village green status on this land cannot be taken into account in the consideration of this application. Equally, the determination of the current application whether planning permission is granted or not will not affect the separate legal process to secure village green status.

Representations have been received referring to paragraph 74 of the National Planning Policy Framework, which states that existing open space, sports and recreational buildings and land, including playing fields should not normally be built on. It must be pointed out, however, that the application site at present does not fall within the definition of any land included in this category. It is open land, but not open space.

Furthermore, the land does not form part of the Borough's green infrastructure network as defined on the Policies Map as part of The Plan for Stafford Borough. It should be noted, however, that the main coverage of this network is in urban areas of Stafford and Stone, where it provides valuable linkages to the countryside beyond. As this particular site, however, lies beyond existing development, within the countryside, rather than within the urban area it would not be likely or necessary for it to be considered for such a designation.

The NPPF still acknowledges within paragraph 17 that the intrinsic character and beauty of the countryside should be recognised and in both paragraphs 17 and 110 that land should be allocated for development with the least environmental or amenity value.

The application site provides significant views over open countryside to the east and north-east. Existing dwellings on the north-west side of Falmouth Avenue are essentially on a ridge with the application site on the opposite side of Falmouth Avenue on land which falls away to the north and north-east offering open views over both the site itself and over a wide area of open countryside beyond.

Although it is acknowledged that significant areas of open land would still be retained both within the red-edged application site between areas identified for development

and on the existing open land beyond extending to the railway line. The insertion of wedges of residential development, however, would create a major visual intrusion and would significantly detract from the open character and appearance of the existing site and that of the open countryside beyond.

It is also acknowledged that the topography of the site would dictate the pattern of any proposed development, with the two existing higher, flatter plateau areas forming the proposed development areas with the steep sided "valleys" remaining undeveloped. In such a setting, therefore, the development "wedges" on higher ground have a particularly obtrusive and harmful impact on the character and appearance of the area. This pattern of development would also result in lengthy boundaries between residential development areas and retained open land, with extensive domestic boundary treatment necessary. This would be particularly unattractive and would further diminish the character and appearance of the retained open land. Consequently it is considered that development of the nature proposed would be likely to conflict with Policy N1 in The Plan for Stafford Borough in (f) that requires that development should ensure the retention of significant landscaping features, (g) includes high design standards that make efficient use of land takes into account the local character, context, density and landscape and (h) that designs have regard to the local context, which include historic views and sight lines.

It has already been established in the Housing Section of this Report that there is no need to develop additional greenfield sites on land outside the existing built-up area. The proposal is clearly contrary to relevant housing policies contained in The Plan for Stafford Borough and there is no justification for development on a site such as this with the consequent harm to the character and appearance of the area and to the surrounding rural area.

Policies and Guidance:-

NPPF- Paragraphs 17 (Core Principles), 110

The Plan for Stafford Borough Policies N1 - Design, N4 - The Natural Environment & Green Infrastructure, N8 - Landscape Character

3. Biodiversity

An Ecological Survey Report and detailed Badger Survey have been submitted with the application.

Detailed consultations have been undertaken with the Borough Biodiversity Officer, Natural England, County Ecology, Staffordshire Wildlife Trust and the Staffordshire Badger Protection Group.

These consultees were also aware of the survey carried out by a local bird-watcher.

Detailed responses have been received from the Borough Biodiversity Officer, Natural England and the Staffordshire Badger Protection Group.

The potential impact of the development on the Cannock Chase Special Area of Conservation is dealt with in the following Section of this Report.

The site is also close to the Baswich Meadows SSSI, although both the West Coast Main Railway Line and the Trent and Mersey Canal intervene. English Nature has advised that it is satisfied that the proposed development would not be likely to have an adverse effect on this site. A condition has been requested requiring that all new residents be issued with a Welcome Pack providing information and recreation opportunities in the locality.

Detailed comments have been made by the Borough Biodiversity regarding the impact of the proposed development on both protected species on the site and on habitats.

With regard to badgers, both the Borough Biodiversity Officer and the Staffordshire Badger Projection Group agree with findings of the Badger Survey that the proposed development will not affect badgers, subject to the recommendations made in the badger report being followed.

Other precautionary conditions are recommended to ensure that bats and reptiles are not harmed by development works.

On the issue of nesting birds the Borough Biodiversity Officer recommends that no works be undertaken in the nesting season unless it can be demonstrated that breeding birds will not be affected through the submission of a method statement for protection/avoidance of nesting birds. He also recommends that nest boxes for house sparrow and starling should be included in all new housing and that suitable retained trees should also be fitted with standard tit nest boxes.

With regard to habitats, he advises that a method statement to accompany the species-rich grassland creation should be prepared following guidelines set out in the report and that hedgerows should be retained and protected as recommended in the report. He also recommends that any loss of hedgerows should be compensated with the creation of new hedges using appropriate native species that hedgerows should be included in a site management plan so that they are cut on rotation to benefit wildlife and that mature trees should also be retained where possible.

While it is acknowledged that many small animals and particularly birds may visit the existing open site, refusal of this application could only be justified on grounds of impact on wildlife if it were demonstrated that the proposed development would have a potentially harmful impact on protected species or habitats. The Borough Biodiversity Officer has raised no objections to the development on such grounds subject to the imposition of the conditions requested.

The parameters plan shows a number of low quality trees to be removed within proposed areas suitable for development. The Borough Tree Officer, however, has no objections to the proposal subject to the submission of a Tree Removals and Retention Plan with any future application and to conditions to ensure the retention and protection of trees.

Policies and Guidance:-

National Planning Policy Framework Section 11 - Conserving and Enhancing the Natural Environment

The Plan for Stafford Borough - Policies N4 The Natural Environment & Green Infrastructure, N5 Sites of European, National and Local Conservation Importance, N8 Landscape Character

4. Impact on Cannock Chase Special Area of Conservation (SAC)

The application site lies 2.15 km from the Cannock Chase Special Area of Conservation (SAC) and is, therefore, within the inner 8 km zone of influence identified around the SAC.

Paragraphs 61 and 62 of the Habitats Regulations require that the Council as a "competent authority" undertakes an appropriate assessment on a project where it is likely to have a significant effect on a European site and its conservation objectives.

The issue was addressed in the Supporting Planning Statement submitted with the application.

An Appropriate Assessment regarding the implications of the proposal on SAC's conservation objectives has been undertaken by the Council and Natural England have been consult on its conclusions.

Given the location of the site within the 8 km inner zone of the SAC, a contribution of £500.00 per dwelling would be secured towards measures to mitigate the impact of the development on the SAC.

It is acknowledged that the proposal includes a level of open space provision significantly above existing Council requirements for on-site provision for a site of this size. Although the current application only seeks approval of details of access at this stage, consent is only being sought for a maximum of 97 dwellings. The Parameters Plan submitted with the application, identifies sections of the overall site to be developed and areas to be retained as open space. If planning permission were to be granted for the proposal, a condition would be attached to restrict development to the sections of the site identified and to ensure the retention of remaining land as public open space.

The application site adjoins other existing open space to the north-west and north-east, which is not affected by the proposed development. This area at present forms

part of a continuous area of open land that includes the application site. The Parameters Plan includes a large central wedge of open space within the application site which will provide good linkage through to this area. Access will also be possible across a retained wedge of open space along the north-western section of the application site and via a retained public-right-of way along the south-eastern boundary of the application site.

Any planning permission for the site would also be subject to the applicant first entering a Section 106 Agreement with the Council, which would include a requirement for a financial contribution for the provision of new and or enhanced recreation facilities in the area together with requirements regarding the provision, maintenance and management of the on-site Public Open Space facility.

Given these factors, it is considered that with the proposed level of open space provision on site linked to the adjoining large area of open space, together with a financial contribution of £500.00 per dwelling, which can be secured as an obligation included in a Section 106 Agreement specifically for that purpose, should satisfactorily mitigate any potential impact on the Cannock Chase SAC.

Natural England has been consulted and has confirmed that it concurs with the Council's assessment conclusions.

Policies and Guidance:-

National Planning Policy Framework Section 11 - Conserving and Enhancing the Natural Environment

The Plan for Stafford Borough - Policy N6 Cannock Chase Special Area of Conservation

5. Highways

This application seeks approval of access details only. The submitted plans show three access points onto Falmouth Avenue. All three accesses include 6 m kerb radii, 5 m wide carriageways and 2 m wide footways.

A Transport Assessment and a Travel Plan has been submitted with the application.

The highway authority has no objections to the application subject to conditions requiring that the development not be brought into use until the accesses have been completed in accordance with the details submitted and subject to the submission and approval of full details showing the disposition of buildings with provision for parking, turning and servicing within the site, together with details of surface water drainage and surfacing. A condition is also requested requiring the submission, approval and implementation of an off-site traffic management scheme covering construction related works as well as contribution of £6,300.00 to be included as part of a Section 106 Agreement for Travel Plan monitoring .

While many representations received in connection with this application raise concerns over access to the site, the suitability of the road network immediately surrounding the site and the capacity of the road network in the wider area, in the light of the recommendations of the highway authority it is not considered that an objection to the proposal could be sustained on highway safety grounds.

Policies and Guidance:-

National Planning Policy Framework (NPPF) - Paragraphs 32, 34, 36 (Section 4 Promoting Sustainable Transport)

The Plan for Stafford Borough- Policies T1 Transport, T2 Parking and Manoeuvring Facilities

6. Other Matters

In line with Policy C2 of The Plan for Stafford Borough, the Borough Housing Strategy Officer is seeking to ensure that 30% of any houses constructed on the site should be affordable housing units and considers that the proposed development should help to reduce the existing housing shortfall in the Borough. Council Policy suggests that affordable housing should be provided at a ratio of 80% social rent and 20% intermediate affordable housing. The Strategic Housing Market Assessment undertaken for the Borough has identified an undersupply of 1 bed, 2 bed and 4 bed homes and an oversupply of 3 bedroom homes and consequently expects that a mix of these required properties should be provided on site. It is also expected that affordable housing be spread across the development in clusters of roughly 15 units and that the look of the affordable properties should be indistinguishable from the open market housing on the site. The provision of 30% affordable housing on the site and subsequent tenure could be achieved by Section 106 Agreement. The size and siting of affordable units would be subject subsequent submission.

The education authority Staffordshire County Council has requested a total education contribution of £708,928.68 based on the proposed construction of 97 dwellings towards the provision of additional school places likely to be generated as a result of the proposed development. This comprises a secondary school education contribution of £488,308.68 and a further £220,620.00 towards 20 primary school places. This would also be included in a Section 106 Agreement attached to any planning permission and such a requirement is supported by paragraph 72 of the National Planning Policy Framework and by Policy I1 of The Plan for Stafford Borough.

The Borough Parks and Open Spaces Officer has advised that both amenity open space and sports pitch provision and built associated facilities in the area fall short of national guidelines and are in need of refurbishment. He has commented that the proposed open space is suitable for the development subject to their being an off-site contribution towards formal play provision to improve the nearest facility. If this is not provided, however, a play area on site to service the development should be provided. As the Council will not be seeking the adoption of the open space, detailed

arrangements should be in place for the on-going maintenance of the onsite open space. In accordance with the financial contributions guide for new development provision of Open Space and commuted sums contributions per dwelling would be required based on an increasing scale linked to the size of units. The Councils Open Space, Sport and Recreation Assessment update identifies that a need for an additional 6 ATP pitches and a deficiency in leisure centre/swimming capacity is also identified in The Council's Assessment and by Sport England. Consequently a contribution per property for artificial pitches, for swimming pools and for sport courts/halls would also be required. These requirements are supported by paragraphs 69, 70 and 73 of the NPPF and by Policies C7 and I1 of The Plan for Stafford Borough and can be achieved through inclusion in a Section 106 Agreement.

Due to the proximity of the site to the main railway line, a Noise Survey has been submitted with this application. This concludes that new dwellings facing the railway line may be subject to levels of noise marginally above the desirable level for avoidance of nuisance and sleep disturbance, but that with appropriate design this can be mitigated and minimised. The Head of Environmental and Health Services has requested that a condition be attached to any approval requiring a scheme of design and mitigation works to be submitted and approved prior to granting full permission to safeguard future occupants of housing close to the railway. He also comments that based on the diagrammatic layout submitted properties will be no closer to the railway than existing residential properties on the adjacent Saxonfields Estate. As the railway line is more exposed at this site, however, he suggests that consideration be given to providing dense planting and landscaping to shield the estate from the railway. He also acknowledges that residents of Falmouth Avenue will still experience some noise and disturbance from increased traffic levels, but acknowledges that this cannot be controlled by his department. Neither does he suggest that this would be such as to warrant the refusal of planning permission.

Policies and Guidance:-

National Planning Policy - paragraphs 50, 69, 70, 72, 73, 123

The Plan for Stafford Borough - Policies C1 Dwelling Types and Sizes, C2 Affordable Housing, C7 Open Space, Sport and Recreation, N1 Design, I1 - Infrastructure Delivery Policy

7. Conclusions

The application site is a green field site outside the existing built-up area of Stafford. The Council has an existing 5 year plus supply of housing land. Strategic Development Locations have been allocated in The Plan for Stafford Borough which has now been adopted sufficient to meet most housing requirements for Stafford Town, with remaining requirements capable of being met through the development of brownfield sites within the existing urban area. There is no need to develop a green

field site such as this with the consequent harm to the character and appearance of the area and to visual amenity.

Consultations

Adjacent Parish (Berkswich):

Comment as follows

Continued building development in the area creates infrastructure problems in relation to school places (primary and secondary);

There is only one health centre serving the whole of the south end of Stafford;

Residents of Falmouth Avenue and surrounding streets will witness a loss of visual amenity resulting from the development;

The development will have an impact upon the Trent valley, a place of special scientific interest;

The development will impact upon the Area of Outstanding Natural Beauty (Cannock Chase);

The road network in the area of the development is narrow which gives rise to concern for emergency vehicle access;

While each development plan must be viewed on its merits, the fact that further development is anticipated in Milford Park and Baswich House Estate raises deep concerns on highways matters generally.

Highway Authority:

No objections subject to the following conditions being included on any approval:

The development not being brought into use until the accesses to the site have been completed;

No development being commenced until full details of the layout of site including disposition of buildings and provision of parking, turning and servicing within the site curtilage, the means of surface water drainage and surfacing materials have been approved; The development being implemented in accordance with the approved details and be completed prior to first occupation;

The development not commencing until an off-site traffic management scheme comprising of: the routing of construction vehicles, wheel washing facilities, measures to remove any mud or other deleterious material deposited on the highway, car parking facilities for staff and visitors and a timetable for implementation has been approved and implemented.

Environment Agency:

No objections and no conditions requested, but make detailed comments to be passed on to developer as informative.

Severn Trent Water:

No objections subject to the approval and subsequent implementation of detailed proposals for the disposal of drainage.

Schools Organisation (Staffordshire County Council):

Comment as follows:

The development falls within the catchments of Walton High School and Leasowes Primary School;

The development is for 97 dwellings with no detailed housing mix currently available. Note that any social rented (not shared-ownership) housing and apartments may reduce any contribution based on this assessment. Ninety-seven dwellings could add 20 primary school places, 15 secondary school places and 3 sixth form places;

As part of the Local Plan process an evidence base was submitted to the Inspector, which included a report entitled "Plan for Stafford Borough: Spatial Plan for Education. SBC and SCC jointly commissioned consultants 'Hewdon Consulting/SKM Colin Buchanan' to carry out an Education Study for Stafford regarding the delivery of educational infrastructure. The purpose of the study was to provide an evidence base to support SBC Local Plan on the need for additional school places to mitigate the impact of the housing options being developed by the Borough Council;

The report quantified the problem of necessary education requirements and concluded that the homes being proposed required an additional 10 FE as a minimum of primary provision and an additional 8 FE of secondary provision in Stafford. In order to establish how much additional secondary capacity was required the report took into consideration the number of available places projected across the 6 secondary schools in the town, over the plan period;

The report identified the likely cost of providing the additional secondary provision through school expansions and the creation of a new secondary school;

The report highlighted that the cost of providing 1 FE of secondary provision through existing school enlargement is £5,034,110, which included the cost of the additional land required for the new school;

Utilising the approach taken by SKM and endorsed by both SBC and SCC the calculated secondary school education contribution for this site is £488,308.68 ($£5,034,110 \div 1,000 \times 97 = £488,308.68$);

Based on our current child yield rate of 3 pupils per 100 dwellings, 30 pupils (1 FE) would be generated by 1000 dwellings;

As noted earlier the number and type of dwellings within this development could add 20 primary school places. We are therefore requesting a contribution towards 20 primary school places of £220,620.00 ($20 \times £11,031$);

The above primary school place contribution is based on 2008/09 cost multipliers which are subject to change;

Based on 97 dwellings we would seek a total education contribution of £708,928.68.

Natural England:

Comment as follows:

Cannock Chase SAC - No objection. Notes that the Council as the competent authority under the provisions of the Habitats Regulations, has screened the proposal to check for the likelihood of significant effects. The assessment concludes that the proposal can be screened out from further stages of assessment because significant effects are unlikely to occur, either alone or in combination. On the basis of information provided Natural England concurs with this view;

Sites of Special Scientific Interest (SSSI): Given the nature and scale of this proposal, satisfied that there is not likely to be an adverse effect on this site as a result of the proposal being carried out in strict accordance with the details of the

application as submitted and subject to a condition requiring that new residents be provided with a 'Welcome pack' providing information on recreation opportunities in the locality. The pack should include educational and awareness raising information addressing relevant ecological issues and the location and sensitivities of nearby national and local designated sites; steps that residents can take to enjoy and conserve these local resources. The detailed content of the welcome pack should be agreed with the Council, but advise that it should address the issue of minimising disturbance to wild birds;

Protected Species - Natural England has published Standing Advice on protected species, which should be applied to this application.

Green Infrastructure - Welcome the proportion of the application site proposed as multi-functional green infrastructure and advise that this should be secured as part of any outline approval.

Biodiversity enhancements - This application may provide opportunities to incorporate features into the design which are beneficial to wildlife, such as the incorporation of roosting opportunities for bats or the installation of bird nest boxes. The authority should consider securing measures to enhance the biodiversity of the site from the applicant, if it is minded to grant permission for this application. This is in accordance with Paragraph 118 of the NPPF. Additionally, we would draw your attention to Section 40 of the Natural Environment and Rural Communities Act (2006).

Borough Biodiversity Officer:

Comments as follows:

Bats

The lighting scheme should be designed in conjunction with the ecologist to avoid light spill in suitable bat habitat;

Should any retained tree with potential for bats require felling, then a bat survey will be necessary along with any suitable mitigation should bats be present.

Nesting birds

Works should not be undertaken in the nesting season (March to August), unless it can be demonstrated by the developer that breeding birds will not be affected through the submission of a method statement for protection/avoidance of nesting birds. This may include timing of work, pre-work checks, avoiding nesting areas etc; Nest boxes for house sparrow and starling should be included in all the new housing; Suitable retained trees should also be fitted with standard tit nest boxes. All nest boxes should be the Schwegler style woodcrete designs. A method statement detailing this work should be prepared.

Reptiles

A precautionary approach is recommended by strimming grass 1 - 2 weeks prior to works commencing.

Badgers

Recommendations made in the badger report should be carried out as stated;
A method statement should be prepared in regards to badgers detailing all recommended and precautionary works.

Habitats

A method statement to accompany the species-rich grassland creation should be prepared following guidelines set out in the report. It should include: identifying most suitable location; ground preparation methods; appropriate seed source/seed mix Management Plan. Management should ideally be carried out in perpetuity;
Hedgerows should be retained and protected as recommended in the report. Any loss of hedgerow should be compensated with the creation of new hedges using appropriate native species. Hedgerows should be included in a site management plan so that they are cut on rotation to benefit wildlife. Mature trees should also be retained where possible.

Staffordshire County Council Ecology:

No response.

Staffordshire Wildlife Trust:

No response.

Staffordshire Badger Protection Group:

Agree with findings of Badger Survey that development will not affect badgers.

Staffordshire County Council Rights of Way:

The path crossing part of the site was created in 1998 by Wildlife and Countryside Act 1981, Section 53, Staffordshire County Council (Public Footpath between Stockton Lane and Stoneford Bridge, Baswich) Modification Order 1998. This path, however, did not make it onto the 1999 3rd Review of the Definitive Map and Statement, and, therefore, on the paper maps, it is not in existence. Another order was completed at the same time, Highways Act 1980, Section 119, Staffordshire County Council (Public Footpath between Stockton Lane and Stoneford Bridge, Baswich) Public Path Diversion Order 1998. This modified the route on the Modification Order. The path was again altered by Local Government and Ratings Act 1997, Sections 14 and 23 (Statutory Instrument 1999 No. 3373), The Stafford (Parishes) Order 1999 No. 3373 which moved the parish boundary resulting in the bottom third of the path being within the un-parished area of Stafford and is therefore now known as Stafford 66. All three of these orders are being included in the 4th Review of the Definitive Map and Statement which is currently ongoing. We hope to have Stafford published by the end of March 2015.

Ramblers Association:

Note that there is a public footpath to the side of the development going down to the canal. This should be protected.

Borough Tree Officer:

The parameters plan shows a number of low quality trees to be removed within proposed areas suitable for development. A Tree Removals and Retention Plan must be submitted with any future application. No objections in principle subject to conditions to ensure the retention and protection of trees.

Borough Parks and Open Spaces Development Officer:

Comments as follows:

The closest play site is the open space and play area on Yelverton Avenue/Falmouth Avenue;

Amenity open space in this area falls short of national guidelines and are in need of refurbishment;

Sports pitch provision and built associated facilities within the area fall short of national standards and are in need of refurbishment to address significant quality deficiencies;

It is noted from the flood risk assessment that the development is likely to see the creation of a flood attenuation basin. Such areas should be discounted from the open space described by the applicant as they will serve no useful function as an area of POS. The lack of continuous water coverage will prevent the use as an area for fishing and occasional flooding will render the areas unusable for recreational activities. Stafford Borough Council will not adopt any land forming part of a flood attenuation scheme;

Will not be seeking the adoption of any footpath or cycle way and associated infrastructure including lighting as part of this development. These paths should be adopted by the highway authority;

The proposed open space is suitable for the development subject to there being an offsite contribution towards formal play provision to improve the nearest facility. If this is not provided then the applicant should provide a play area on site to service the development;

Will not be seeking the adoption of the open space and detailed arrangements should be in place for the on-going maintenance of the onsite open space;

Due to the size of this development the Council is reasonably entitled to request a quantitative provision of 34 m² per person of open space provision under its current policy. Given the outline nature of the development it is not possible at this stage to provide a full break down either in terms of capital investment or the area of POS required as part of this proposal.

All open space provision should be on onsite.

In accordance with the financial contributions guide for new development provision of Open Space and commuted sums, the financial contribution required for this development should be: £315.75 for one bed units, with £581.95 for commuted maintenance; £526.25 for two bed units, plus £969.91; £842.00 for three bed units, plus £1,551.86; and £1052.50 for four bed units, plus £1,939.83;

The Councils Open Space, Sport and Recreation Assessment update identifies that a need for an additional 6 ATP pitches due to an increase in the population of the Borough and demand;

Sport England and the Open Space, Sport and recreation Assessment identifies a current shortfall of 300 sq m and that that Stafford Leisure Centre is operating at

capacity. Any future developments will further increase the deficiency in swimming capacity;

The current Sport England Facilities calculator has been applied to the proposed development as there will be an impact upon facilities in the local area as residents join local sporting clubs either as adults or through schools and increased usage on swimming pools.

Sports Contributions per property: £5,949 for artificial pitches; £32,746 for swimming pools; and £42,918 for sport courts/halls.

Housing Strategy:

Comment as follows:

Developments of 12 or more dwellings within Stafford must deliver 30% affordable housing, as proposed;

As of 10 June 2014 there were approximately 1,452 households on the Housing Register in Stafford Borough. In addition, the Strategic Housing Market Assessment completed in October 2012 suggests an annual affordable housing shortfall of 210 dwellings. The Assessment also identified an annual shortfall in general needs accommodation of approximately 154 units and a shortfall of 55 for older person's accommodation;

This development should help to reduce the housing shortfall;

Council Policy suggests that affordable housing should be provided at a ratio of 80% social rent and 20% intermediate affordable housing;

The Strategic Housing Market Assessment identifies an undersupply of 1 bed (59%), 2 bed (40%) and 4 bed (1%) homes and an oversupply of 3 bedroom homes. A mix of these required properties would be expected on site;

Affordable housing must at least meet the requirements of the Homes and Communities Agency in terms of size (floor area) and rent level as well as other factors, which affect the work of Registered Providers;

It is recommended that sites not only provide a mix of bedroom numbers but also a mix of property sizes, able to accommodate more than the minimum persons. For example, 1 bed properties should be large enough to accommodate 2 people whereas 2 bed properties should be large enough to accommodate up to a 4 person household;

It is preferred that any 1 bedroom accommodation contain a minimum of 3 habitable rooms;

Where a 2 or more bedroom affordable home is intended for rent, it is recommended that this is not delivered as part of flat/apartment unit as such properties are unaffordable for single people or couples on benefits and are not favoured by Registered Providers as being the best environment for families with young children;

On large developments with a mix of affordable and open market housing, it is expected that the affordable housing be spread across the development in clusters of roughly 15 units to allow for easy management by Registered Providers. The look of the affordable properties should be indistinguishable from the open market housing on the site;

The affordable housing on this development should provide a mix of properties to meet the identified needs of residents and must meet the identified design standards.

Head of Environmental and Health Services:

The main Environmental Health issues considered affecting this site are Railway Noise and past uses of the land;

The detailed Environmental Report demonstrates that there are no issues regarding possible contaminated land;

The noise report submitted with the application concludes that new dwellings facing the railway line may be subject to levels of noise marginally above the desirable level for avoidance of nuisance and sleep disturbance, but that with appropriate design this can be mitigated and minimised;

A condition requiring a scheme of design and mitigation works to be submitted and verified by an independent Noise Consultant and submitted and approved by the Council prior to granting full permission to safeguard future occupants of housing close to the railway;

From the site layout submitted properties will be no closer to the railway than existing residential properties on the adjacent Saxonfields Estate. The railway line however; is more exposed at this site. Consideration is recommended to dense planting and landscaping to shield the estate from the railway;

Residents of Falmouth Avenue will experience noise and disturbance from increased traffic levels, but this cannot be controlled by Environmental and Health Services;

The layout of the estate will need to accommodate the needs of refuse and recycling collection vehicles and the layout and design of individual properties will need to include appropriate storage for refuse and recycling bins;

Should the application be approved the following conditions are considered appropriate in order to safeguard nearby residential occupiers from undue disturbance during development;

Recommend conditions to restrict hours of construction works and associated deliveries and that delivery vehicles should not park on the access highways to the site;

Also request facilities at the site for damping down to prevent excessive dust, road sweeping to be carried out at regular intervals on the site and on the access highway to prevent excessive dust, that any equipment which must be left running outside the allowed working hours be inaudible at the boundary of occupied residential dwellings, site screening be provided and that there should be no burning on site during development.

Police Architectural Liaison Officer:

Recommends that the development attains Police Secured by Design (SBD) award.

Jeremy Lefroy MP:

Comments as follows:

Advised by the Minister that even before adoption, a local plan already found to be compliant should be used as a basis for planning decisions;

Area has been a well-used public open space by the community for many decades. This has been a huge plus for the local community, with obvious health and recreational benefits. To lose it would be devastating;

Inappropriate for matter to be considered until application for Village Green status has been resolved;

Development of this size will place significant strain on local infrastructure. Agree with many residents that have raised concerns based on their own experiences; Roads are far from adequate to accommodate up to an extra 200 vehicles. This would not just generate congestion, noise and fumes, but will also create a road safety problem in an area where a good number of children walk to local schools; Local doctor's surgeries, schools, shops etc do not have current capacity to cope with influx of people from development; Local Plan identifies areas for development, supposedly so that infrastructure problems do not arise again. This site is not in the local plan.

Falmouth Action Group:

Original comments as follows:

Parameters Plan shows a distribution of development plots and open space consistent with topography and would be a challenge to major national builders with standard housing designs and layouts. The shape of the north-western development plot and access is indicative of a high density development;

Disagree with applicant's claim that Stafford Borough Council does not have a 5-year housing land supply. The statement is a snapshot in time taken as of March 2013 and is out-of-date. Since then significant steps have taken towards the adoption of the new local plan and in identifying a strategic long-term supply of land for housing in Stafford Town. Understand that at present time there is no shortfall. Situation has not been more buoyant in terms of consented sites and opportunities for decades;

Great weight should now be given to New Local Plan, which has been subject to several stages of statutory public consultation and thorough Public Examination. The final report of the Inspector is available, which indicates that that the plan is sound, subject to the required modifications;

The application site, which was previously allocated for housing in the previous plan, is not allocated in the new Local Plan. The new Local Plan strategy focuses on housing in three major defined locations to the east, west and north of the town, with accompanying infrastructure;

The Falmouth Avenue site does not fit in with the new development strategy. As a stand-alone housing site it contributes no social, education, community or transport infrastructure, but instead takes way highly valued open space from a local community that is already well-established;

Applicants claim that site is within defined Residential Development Boundary for Stafford in accordance with Policy HOU2 of previous local plan. Settlement boundaries, however, are to be established in a Site Allocations Document. This process is set out in Spatial Principle 7. The applicants make no attempt to reconcile the proposal in terms of the principles set out in SP7. The Falmouth Avenue site performs poorly in respect of a number of the 12 principles outlined, particularly in terms of its relationship to existing facilities. It is one of the most peripheral parts of the Town relative to the Town Centre and the Lynton Avenue/Bodmin Avenue local centre. It is over 30 minutes in terms of bus journey times from the Town Centre;

The proposal will have a negative impact on existing services and infrastructure. It makes no contribution to highway improvements and is in a location where the combined impact of a number of proposals will have a considerable impact on the local network;

The Transport Assessment is complex and buries vehicle trip assumptions and multi-modal trip generation assumptions in technical schematic figures. There is no reason why a list or map of future developments cannot be provided that it could be assumed would contribute to trip generation in the model;

Falmouth Avenue is a narrow sub-standard road, with a width of 4.5 m not 6 m as assumed;

Site lies adjacent to areas with the highest evaluation score in the Historic Character Environment Assessment undertaken for the Borough Council by English Heritage and the County Council. These scores were based on the survival and potential of the character zone, the documentation of historic assets, range and diversity of assets, consistency of the character zones, their amenity value and their sensitivity to change;

Most significant impact of the proposal would be with the loss of locally important open space, which has been used extensively by the local community over the years and it is also clear just from observing aerial images how little green space there is in this dense residential area;

The economic and social benefits that would result from the proposal are limited to essentially supplying houses that would apply to any residential development proposal;

In terms of environmental sustainability, promoting sustainable transport and accessibility, the proposal site has a number of shortcomings when considered in the light of SP7 of the Local Plan and do not accept that benefits outweigh significant and demonstrable harm to community;

Proposal clearly contrary to the new Local Plan, with little in support in terms of other material considerations, with a number of alternative more sustainable and accessible sites that could make good housing land supply requirements for the Town;

If Town/Village Green registration application is successful, no building would be permitted on this site;

The requirements of Policy N4 of Local Plan which states that the Borough's Green Network will be protected, enhance and expanded indicates that the site should be protected;

The NPPF enables local communities to identify for protection through local plans green areas of particular importance to them on the basis of beauty and recreational value. Perhaps this land should be so designated;

There are only two designated paly areas in Baswich at Bodmin Avenue and Yelverton Avenue. Neither is classed as open green space where all groups can enjoy countryside and recreational space and do not contribute to visual amenity;

Application site is a valued amenity to residents. Flora comprises mature trees and hedges, with younger bushes, trees and saplings and grasses providing food for animals and birds. Amongst the fauna are small mammals and an abundance of insect life, which attract birds and bats. A survey carried out by a local bird-watcher has identified 64 species, some of which nest on the site. Others live locally and hunt or forage for food and others break their migration to feed there. This differs radically from the SCC Wildlife Survey, which reported 27 species, which it is believed is due to a small number of snapshot visits being undertaken;

Survey completed by many of the adult users of land, but point out that many children also enjoy the open space. Survey was completed in a very short time and

consequently is not exhaustive. Of the 363 respondents:, 275 (75%) used the space once or more per week; 110 (30%) one to 3 times per week; 49 (13%) 4 to 6 times per week; 54 (15%) 7 to 13 times per week; and 62 (17%) twice per week or more. The respondents use the space for a wide range of activities and many may be involved in several activities. The most popular pastime is dog-walking (168 - 46%), followed by gentle exercise, including walking (153 - 42%), habitat related, including bird-watching, viewing/photographic flora and fauna and fruit-picking (51 - 14%) and finally joggers, runners, speed-walkers and cyclists (25- 6%);

The existing open green land comprises 11 acres, but includes two large gullies running from Falmouth Avenue to the railway line, which are not suitable for any recreational activity due to their depth and steepness. Neither area could be used for housing and although would be left untouched, could not be viably used by visitors;

Cost of development to community would be immense as it would cover virtually all of the usable land, with the small token space remaining being surrounded by housing and having lost its current character;

Development would destroy wildlife habitat and much of the other flora;

Residents will lose recreational space and social aspects of meeting friends and children will lose safe play and meeting space;

Development will result additional car journeys to Cannock Chase, which is a Special Area of Conservation, causing unnecessary pollution and will exacerbate high levels of congestion on surrounding roads. County Council has been instrumental in creation of Policy N6, which aims to protect SAC, but application contains a few paragraphs concerning the SAC and no impact assessment. This development is one of closest to the SAC. Mitigating effects on the SAC is concerned with creating other spaces that visitors might use, but County Council is seeking to destroy existing space;

Infrastructure in and around Baswich is inadequate. Health Centre, which has a large patient base, is under pressure with 2-hour waiting times for walk-in surgeries and waits of up to a month for appointments to see specific doctors;

There are particular difficulties with access and parking around Leasowes School, with concerns over child-safety. Traffic problems are made worse around school due to some drivers using surrounding roads as a "rat-run" due to congestion on the main road network;

House building over recent years in south-east Stafford and the construction of two retail parks have resulted in congestion on Weeping Cross, Radford Bank, Lichfield Road, Cannock Road and Baswich Lane;

The two local primary schools are almost full to capacity at present with some local children having to be driven to schools outside the area;

As local bus service is at best 2 per-hour and generally most residents work outside Stafford, most of the new residents will be driving to work, adding at least 180 cars leaving/returning to Falmouth Avenue each day. This in itself causes problems because the junction between Falmouth/Porlock Avenues and Stockton Lane is difficult to navigate and extra traffic will increase risks. Existing narrow roads were not designed to accommodate current levels of traffic;

The current right of way which is to be retained, would run immediately behind existing houses in the Close and new properties, creating a corridor to link to the canal. This was rejected in a previous application by the Police on public safety

grounds and consequently the current application is wrong as the footpath would have to be moved;

Existing congestion was not foreseen because the impact of previous applications was judged in isolation. Had the impact of Bluebell Hollow, Queensville, BRC, Saxonfields, behind Alstom and the two retail parks been assessed together, the congestion could have been avoided. It is essential that the cumulative effects of developments now proposed in the area, which would add almost 550 houses, should be considered;

The planning application flagrantly goes against local community feeling and will be to the detriment of the health and well-being of the majority of people living in the area.

Additional Comments in response to Further Information:

Policy Stafford 1 of new Local Plan establishes that the residual housing need to be accommodated is for 5233 dwellings, then to continue to identify three strategic development areas which between them will deliver 5900 new homes. The current application site forms no part of this development strategy and is clearly not in conformity with it. This point is overlooked in the applicant's assessment of the recently adopted plan;

The County Council in its formal response to the Local Plan supported the policies contained within the Plan to deliver the homes required, but in bringing the current proposal forward, particularly in advance of any formal allocations process, the County Council is seeking to undermine the plan and strategy that it has previously publicly supported;

The applicants refer to Policy 7 to support their case, but this is questionable as there will not be a need to identify further land releases for Stafford Town and if this policy was to be applied, there are a number of flaws and omissions in the assessment they have undertaken. In particular, they claim that the walk to the nearest bus stop is 250 m, yet the Transport Assessment submitted with the application quotes a distance of 520 m, which is also recognised in the Assessment as being beyond the maximum distance suggested in relevant guidance;

The policy has not been properly applied by the applicants. This requires that the development be the "most sustainable". The production of the new Plan has involved an exercise to identify the most sustainable sites. This site was not identified and the Plan states that no sites south of Stafford were to be proposed;

Policy requires that development should not impact adversely on important open space, not protected or designated open space. NPPF defines open space as all open space of public value, including land used for recreation. The County Council sign on the application site confirms that express consent is given to the public to use the land for recreational purposes. The site is clearly open space, which is important to local people and this long-term use demonstrates that the land contributes to the special character of the area;

It is also clear that this is locally important open space;

No reference is made to Policy C7. This states that development that results in the loss of open space, sports and recreation facilities will be resisted unless better facilities can be provided or that redevelopment would not result in a deficiency in the local area. The proposal clearly conflicts with this policy;

There is no reference to Paragraph 74 of the NPPF, which mirrors the requirements of Policy C7. This states that such land should not be built on. The application site does not fall within any of the exemptions;

No mention is made of Policy N6. Have seen no proposals by the applicant to mitigate the impact of the development on Cannock Chase SAC;

The redevelopment of open space is a fundamental failing of the scheme, which means that proposals cannot be considered sustainable development and consequently that all levels of planning policy indicate that the development should be refused;

Applications on sites at Radford Bank and Cornwall Drive that fall outside strategic development areas for Stafford have already been refused, even where it forms part of a lapsed allocation. Any alternative conclusion in respect of this application would be inconsistent;

Remain concerned that County Council as highway authority has failed to give proper consideration to the cumulative impact of the many developments in this area on the highway network. Unacceptable to look at each development in isolation, when it was evidence commissioned by the County Council that led to the South of Stafford not being considered as a strategic development location. It is aware of congestion on A34 into Stafford and at roundabouts at top and bottom of Radford Bank, but it chooses not to ask developers to assess this issue or contribute to mitigation measures. Would ask again for Borough Council to commission its own review of highway implications of development in this area.

Neighbours: 243 individual representations received from the occupiers of 218 properties and a Petition with 1500 signatures. Points raised:

Land not included in new development plan for housing;

More suitable sites for new housing development; that are more sustainable and accessible;

Query why this smaller site is being pursued when Council has publicised a number of other large open locations as being suitable for development;

Better to resolve issues and develop former Police Headquarters, which is a brownfield site;

This site should not be developed until former Police HQ site has been developed;

There are many brownfield sites in the Borough which could be considered;

Contrary to The Plan for Stafford Borough requirement that development should not "impact adversely on the special character of the area, including not impacting on important open spaces and views";

The Plan for Stafford Borough states that land will not be consumed for a short-term solution;

Recent applications for housing in South Stafford have been refused as housing allocations have already been met - Council should not accept applications from developers until this situation changes;

No need for speculative development in sensitive areas following the adoption of The Plan for Stafford and also given that the Council has a five-year supply of housing land;

Disagree with applicant's statement that that Stafford does not have a five-year supply of housing land as required by paragraph 47 of the NPPF;

Greater weight should be given to The Plan for Stafford Borough rather than the old local plan as part of which this site was allocated for development (Proposal H12). Application site is not allocated in the new plan;

The application site does not fit with the new strategy and as a stand-alone site, the contributes no social, education, community or transport infrastructure, but instead would take away highly valued open space from a well-established community;

Settlement boundaries are to be established in Site Allocations Document in new plan replacing settlement boundaries referred to by the applicants;

Relevant policy in new plan is SP7, which requires that only where insufficient sites on previously developed land in sustainable locations are available should greenfield sites be released. Application site performs poorly in respect of a number of principles outlined in this policy;

Much emphasis is placed on the claim that this is sustainable development, but this is based on economic and social benefits essentially in terms of supplying houses, that would be typical of any residential proposal. In terms of environmental sustainability, however, the site has a number of shortcomings;

Application has many inconsistencies with NPPF;

Proposal is contrary to Stafford Borough Council Housing Strategy as existing open space promotes health and wellbeing, which is priority of this strategy and also is contrary to aim to work in partnership for the benefit of the community;

New development should meet local needs while protecting and enhancing the existing quality of life in the Borough and the development of greenfield sites can never be environmentally acceptable;

NPPF in Section 11 states that the planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, geological interests and soils and by minimising impacts on biodiversity, that planning decisions should encourage the effective use of land by re-using brownfield land and planning permission should be refused if significant harm cannot be compensated for or adequately mitigated;

Maintain that site constitutes open space as defined in Paragraph 54 of the NPPF;

NPPF states that existing open space, sports and recreational buildings should not be built unless surplus to requirements, would be replaced by at least equivalent provision or it is for alternative sports/recreational provision for which there is greater need. The loss of this land would be contrary to this guidance;

Development of this site would not constitute sustainable development and is contrary to NPPF and to UN Resolution 42/187 as it would compromise future generations;

Assumptions made by developer based on 2001 Local Plan are out-of-date;

Applicants pay little attention to The Plan for Stafford Borough in their Planning Statement;

Believe that site forms part of the Green Network and is subject to protection of Policy N4 of the new plan;

When site was previously allocated for development, the eastern bypass proposals were still in place;

Query why more existing empty properties and empty spaces within Town cannot be used for housing before developing new areas;

Urge the Council to press for the provision of additional accommodation for the elderly, which in turn would free up existing larger properties. Not appropriate to build high density housing on local green space;

Aware that further development is being proposed at rear of Stockton Lane;

Proposal to build 600 houses at the Priory end of Baswich Lane;

Suggest housing obligations should be met by creating small new villages where the necessary infrastructure can be provided at the same time as the development;

Believe that this site is Green Belt land and consequently that its development would be contrary to guidance in the NPPF;

Local residents feel "hounded" by the constant threat of new developments, which would take way green areas and spoil their quality of life;

Proposed development unnecessary and detrimental to the local community;

While financial gain would be short-term, the longer term welfare and health of the community should also be a factor;

Due to cut backs in recent years, Council seeking to supplement income based on selfish needs not benefitting this part of Stafford;

Proposal is contrary to Space About Dwellings guidance, which requires that proposals should respect the character of their surroundings and result in environmental and landscape benefits;

Query whether development will lead to the Town area will eventually link-up with The Haywoods;

Loss of natural environment providing a habitat for wildlife and flora;

Site has returning Whitethroat, Chiffchaff and Willow Warblers on annual migration from Africa and breeding British species such as Song Thrush, Wren and Dunnock;

Destruction of natural habitat, impacting on rookery along canal bank, Buzzards, Owls, Sparrow Hawks, Kingfishers, Herons, Red Kites, Greater Spotted Woodpeckers, Cuckoos, Kestrels, Peregrine Falcons, bats, rabbits, hedgehogs, field mice, shrews, moles, badgers, foxes, squirrels, butterflies and dragonflies;

What will happen to deer that currently come into the field;

Loss of this area would reduce numbers of birds visiting gardens of neighbouring houses;

As this site is ecologically different from that of Cannock Chase it provides a vital habitat for birds, small mammals and plants;

Do not consider that ecological report gives an accurate indication of the birdlife using the site - report attached in support of claim. Lists the following species: Song Thrush; Green Woodpecker; Willow Tit; House Sparrow; Starling; Willow Warbler; Whitethroat; Bullfinch; Red Bunting; Dunnock; Linnet; Kestrel; Grey Wagtail; Mistle Thrush; Fieldfare; Redwing; Brambling; Goldfinch; Greenfinch; Lesser Redpoll; Siskin; Chaffinch; Blackcap; Chiffchaff; Garden Warbler; Lesser Whitethroat; Great Spotted Woodpecker; Hobby; Buzzard; Sparrowhawk; Grey Heron; Nuthatch; Treecreeper; Blackbird; Blue Tit; Great Tit; Coal Tit; Long tailed Tit; Goldcrest; Robin; Wren; Meadow Pipit; Pied Wagtail; Yellow Wagtail; House Martin; Swallow; Swift; Redstart; Spotted Flycatcher; Stonechat; Yellow-browed Warbler; Waxwing; Carrion Crow; Jackdaw; Magpie; Jay; Collared Dove; Stock Dove; Wood Pigeon; Mallard; and Pheasant. Little Owl, Tawny Owl and Barn Owl have also been reported by third parties. These comprise 64 species, of which 5 (2 species breeding) are red-rated on the Birds of Conservation List, 14 (2 species breeding) are amber-rated and 26 other species are breeding.

Hundreds of rabbits to be found on land - known as Rabbit Hill, also Bunny Hills.
Enjoyed particularly by children;
Wildlife and habitats have already been affected by previous development;
Loss of trees and hedgerows;
Large number of young Oak trees will be lost that could not be replaced. Important that semi-mature trees kept to replace aging trees;
Concerned over assurances that trees will be protected;
Elderberries, blackberries, damsons, carb apples and greengages can all be found growing in bushes - where else can this be found in Stafford;
RSPB campaign to make artificial homes for birds within gardens would not be necessary if their natural habitats, such as the land at Falmouth Avenue were left intact;
Loss of public amenity;
Loss of recreational land;
Loss of safe recreational area for children;
Used by walkers, joggers, cyclists and horse riders;
Community focal point;
Has been increased use of the open space over the years;
Will remove the open aspect over the Sow Valley;
Land can be used for different recreational purposes throughout the year including sledging in winter;
There are few places for children to play. Nearby Yelverton Field where toddlers can play on equipment is not a good play area for slightly older children;
Local playing field, which is already subject to anti-social disruption, will become unusable;
Site is an important peaceful open space for community;
"Special place";
Site is used by residents of all age groups;
Land proposed to be retained as open space is not suitable for use by some groups because of its location and its sloping nature;
Proposed development of existing green space is contrary to promotion of walking for health by Council;
Dog owners make much use of this area, which has become a community in its own right - loss of this area would break a chain in the spirit of the local community;
Field is currently used for access to Walton by children from Saxonfields. No provision for this in proposals;
Existing open space is invaluable for teaching children about wildlife;
Provides space for the elderly, particularly those with not able to go further afield to walk and meet;
Land has been perceived as "common land" and has had unrestricted access for over 40 years;
This is common land and should not be available for development;
This was originally Stockton Common, but was "loaned" to a private individual for food production during World War II. It should have been reinstated as Common as were Milford and Stafford Commons, but the registration was opposed by that individual;
Although land has long been used by Community, County Council put up notices granting public access when they already had right of use;

Area should be turned into a proper nature park for the whole of Stafford;
Site should be given Village Green status;
No decision should be made until a decision has been made on whether the land should be given Village Green status;
Site has a countryside feel;
The surrounding area has very little open space;
Weeping Cross has very little open space for dog walkers and other recreational use;
Concern that if this area were to be lost, dog walkers would have to use existing play areas, with a consequent risk of infection to children;
Loss of open space may result in increased dog-fouling of streets;
Baswich has only one small play area and residents rely on this site for open space;
Baswich should have much more open space similar to what is provided in Wildwood;
Baswich and Weeping Cross have less open space than you would expect to find in residential areas of cities;
All other estates in Stafford have their own green spaces - upsetting that the only green space in Weeping Cross is considered to be of so little value that it can be sacrificed;
Concern that lack of recreational space will lead to increased travel and usage of Cannock Chase, a protected area;
Applicants refer to recreational opportunities afforded by developments in the surrounding areas mitigating impact on Cannock Chase SAC, but as these developments are on most of the open space in the area, little open space would remain, with consequent adverse effects on the SAC;
Important to be able to explore open space and see wildlife without having to drive out further into countryside, with pollution that this would cause;
Provides a safe exercise and running area;
More use could be made of land to encourage outdoor exercise and reduce obesity;
Proposed open space areas will be in "valleys", which would be otherwise difficult to develop - understand that these areas would be left as they are, which would result in there being no recreational areas for children who would migrate to the playing field at the end of Torrington Avenue/Falmouth Avenue. Contrary to SBC policy that requires that developments should contain recreational space on-site;
Important "green lung" between existing houses, railway line, with attractive sloping, undulating nature and unspoilt, unkempt vegetation;
The fact that the land is untouched by local authorities is what makes the area so popular than many managed amenity spaces;
This existence of sort of space is what made moving to Stafford appealing;
Once developed, site will never be greenfield again;
Surrounding housing area is large enough to remain a safe and pleasant environment, but without green space will be like the centre of town. A large area of farmland has already been lost with the development of Saxonfields in 2002-3;
Several roads have to be crossed to access alternative open space;
Development would have detrimental impact on Staffordshire Historic Environment Application site lies adjacent to areas with the highest evaluation score in the Historic Character Environment Assessment undertaken by the County Council and English Heritage in 2009;

Site provides easy access to canal path;
Adjacent residential area has become less desirable over recent years;
How can the houses be made sustainable, with low impact on the environment;
Main junction to enter/exit Falmouth Avenue is a tight bend at the junction of Porlock Avenue and Stockton Lane, which has reduced visibility when entering from Stockton Lane and this junction would have to be altered significantly to become safe enough to cope with the large number of additional vehicles;
Roads inadequate and overstretched;
Additional 150/200 cars will add to existing congestion;
Buses and emergency vehicles already have problems negotiating parked cars at peak times;
Much of the development over the last 30 years feeds onto the Lichfield Road/Cannock Road bottleneck and onto Radford Bank - current proposal will result in more traffic along this route;
Getting into Stafford between 08.15 and 09.30 is already a nightmare, not helped by extra traffic lights near to B&Q and deliveries of vehicles to the BMW garage. Scenario is reversed after 5.00. Even at weekends queues are excessive;
Falmouth Avenue is very narrow and not suitable for any more traffic;
Falmouth Avenue was constructed to serve only housing on its western side – the EDR was scheduled to run parallel;
By not widening Falmouth Avenue but introducing calming measures will be of no benefit and will just add to congestion;
Concern over increased use of Seaton, Torrington and Babbacombe Avenues, which were constructed 50 years ago to accommodate traffic levels at that time;
Specific problems on Porlock Avenue associated with Leasowes School;
Additional traffic on Falmouth Way will compromise safety of users of existing well used cycle path running from Truro Way to Falmouth Avenue;
Impossible to get out of Stockton Lane at school closure times;
Bodmin Avenue is already used as a "rat-run" by early morning commuter traffic - problems will be exacerbated by development of Police HQ Site;
Concerned over impact on traffic of an Aldi supermarket;
Road network work has not been particularly neglected in this area;
Falmouth Avenue is narrow and not suitable for additional traffic;
Will be difficult to provide public transport because of restricted width of Falmouth Avenue;
Impact on roads in Baswich, particularly Baswich Lane and Cornwall Drive;
When M6 has problems, Baswich area is almost at a standstill;
Congestion particularly bad around local schools;
Eastern Bypass should have been extended at same time as housing nearby developments - now too late;
Eastern Distributor road has been in pipeline for 40 years and has been shelved again - if Government want more houses they should give funding to build new and better roads;
Pressure should be put on the highway authority to implement measures to improve traffic flow on existing network - better repairs, more yellow lines, Park and Ride;
Suggest old Police Headquarters and locations at Parkside and off Newport Road and Wolverhampton Road;

Route along Baswich Lane to Tixall Road struggles to cope with existing traffic, particularly given the three narrow dilapidated bridges on the route;

Bridge over canal already subject to a weight restriction will not be able to withstand increased volume of traffic;

The Baswich Lane/Blackheath Lane route should be widened and straightened, with the proposed cycle path abandoned and Lichfield Road should also be widened wherever possible below Baswich Lane;

Specific concern over the potential impact of the development of this site together with the development of the Police HQ site;

Concerned over impact on road network of other developments in and around Stafford Town already approved;

Proposed plans to extend the Beaconside route through the back of the Kingston Manor Estate and join it to Baswich Lane will not resolve existing traffic problems and will not compensate for population increases resulting from development;

Cars have been recorded travelling through the estate at speeds in excess of 40 mph;

Age profile of Falmouth Avenue residents shows that a majority are retired and residents would not normally contribute much to rush hour traffic. This profile would change with proposed development, with a likely greater impact on rush hour traffic than simple numbers would suggest;

Concerned that with more children and more cars, accidents more likely;

No longer safe for children to walk to Leasowes School because of the volume and speed of traffic on roads surrounding the school. Only due to crossing wardens that children have been kept safe;

Danger for pedestrians, particularly children, going to and from the three schools in the area will be increased;

Lack of off-street parking;

Parking at Bodmin Avenue shops is insufficient - how will they be able to cope with extra demand;

Concerned over impact on road network resulting from development of Walton Garage parking area and loss of garage parking;

Bus services will be seriously affected;

Existing bus services are subject to late-running and cancellation due to traffic congestion;

Query whether any additional bus services will be provided;

Travel Report suggests that there is a good frequency of buses in area, but 2 of the 3 routes are 1 km from site and not easily accessible for many elderly and vulnerable residents;

Nearest bus stop is 520 m from site, whereas new developments should be located within 400 m of a bus stop;

Transport Assessment does not take into account cost of travel, which at present is £4.40 for a return trip to and from Stafford;

Will there be any restrictions for emergency vehicles to access;

Conflict of interest with the applicants also being the local highway authority - the areas subject to detailed analysis in the Transport Assessment were chosen in conjunction with the County Council;

Dispute the decision of the highway authority that the areas around Queensville Roundabout, Baswich Lane double mini-roundabout did not need a detailed analysis;

Seaton Avenue, which is close to the development site has not been considered at all in Traffic Report;

Some of the data for traffic at the Porlock Avenue/Baswich Lane junction is 6 years old and out-of-date;

Traffic survey analysis produced in support of the application does not reflect the reality of the situation experienced on a daily basis by local residents;

The Transport Assessment is difficult to interpret, but given the overall depth of analysis does not provide a list or map of future developments that they have assumed would contribute towards trip generation in their model;

Transport Assessment does not mention the 180 houses approved on the former Police HQ site;

As there is no significant employment within walking distance, residents will have to travel to work by car;

Query whether cumulative impact on traffic of all proposed developments in the area has been taken into account;

Infrastructure is unlikely to cope without being increased;

No new development should be permitted within the area without essential infrastructure of roads, schools and a GP Surgery;

Old Lynton Tavern building should be redeveloped to provide an extension to the Weeping Cross Health Centre;

Developers should be required to pay commuted sums to the costs of additional teachers, police officers, fire officers, doctors, health services etc made necessary as a result of their proposals until they can be taken over by government;

As existing schools are full - new pupils will have to be taken by car to nearest school, adding to congestion;

Nearest Nursery School at Leasowes is already full;

St Anne's School is almost full;

Walton High School is full to capacity;

Walton High School is already in need of refurbishment to maintain its present obligations and due to the influx of children from neighbouring towns and villages;

More school places should be provided before development;

If the site is to be developed it should be used to build a primary school as existing Leasowes School is an old building, which may not be up to modern standards. The Leasowes site could then be used to provide bungalows, which would be more convenient for existing shops and services and would free up family homes for new families;

Hospital no longer has a 24-hour A&E department and is likely to be further downgraded - how can more people be accommodated in Town without fully functional hospital;

Local Doctor's Surgery is full and more patients cannot be accommodated. Existing waiting times are excessive and will increase if more housing is allowed;

Doctor's Surgery has been under particular pressure since the closure of the Wildwood Surgery;

Should offer incentives to establish a new Surgery before further development;

Residents would prefer to pay a little extra on Council Tax bills to off-set loss of revenue from sale of the site;

Existing pleasant view over open space from properties will disappear;

Concerned that existing sewerage systems, including Brancote Works, will not be able to cope with increased demand;

Have not seen any information about local services - can water, electricity and gas supplies cope;

Light and noise pollution from additional traffic;

Increased numbers of vehicles will contribute towards air pollution, which is often the cause of asthma particularly affecting the elderly and young;

Where will the 200 jobs be provided for the proposed residents;

Disturbance during construction period;

Although this is only an outline scheme, the Design Statement indicates that an aim that development would be sympathetic to the natural contours and setting of the site - without some levelling, development would be likely to be significantly higher than existing houses on Saxonfields Estate, particularly Bude Drive;

Development will block sunlight and daylight to neighbouring properties;

No regular police or PCSO patrols in area, but will be increased problems with increased housing;

Concern over potential anti-social behaviour in Torrington Avenue/Falmouth Avenue and outside shops on Bodmin Avenue;

Original plans showed affordable housing in one distinct area, rather than spread throughout development;

Standard of public services has declined and cannot afford further decline, which would be likely as further development will add further pressure to overstretched services;

FRA concludes that connection to existing assets is only viable outfall from site for storm water and that this may require access over third party land. This should be investigated further. Development should not be permitted if adequate arrangements cannot be put in place to dispose of storm water;

Arboricultural Report is out of date;

Proposal shows disregard for Tree Preservation Order affecting site;

Express concern in the way that a series of developments have been separately processed despite them all impacting on the same schools, surgery and section of road network;

Proposal is clear example of what the government was seeking to avoid in promoting the 2011 Localism Act;

Local opposition and the opinions of those most affected by the development should be heard;

Do not believe that comments will make any difference to outcome;

Development of areas previously identified for public amenity demonstrates a deplorable attitude to previous commitments;

Not happy that public consultation meetings are being held prior to the submission of applications;

Public exhibitions for proposed developments on unallocated sites are a waste of money;

Proposed layout as shown in public exhibition would be unsuitable due to the proposed split of affordable homes on one site and market homes on another, with two separate entrances;

Social housing proposed will be detrimental to area;

Social housing areas are linked to increased anti-social behaviour;

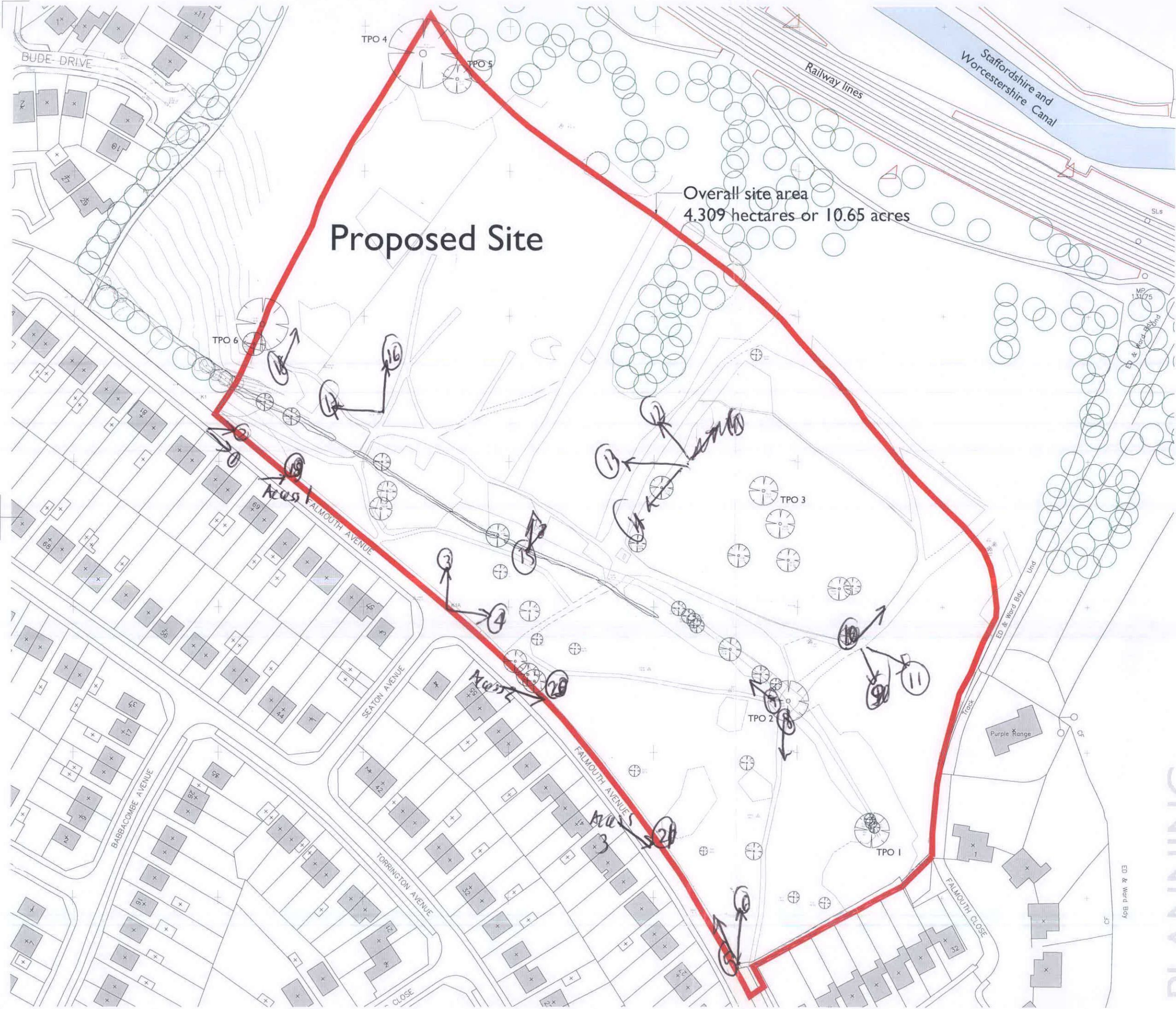
Saxonfields already has its fair share of social housing. Believe that new developments are no longer required to provide social housing;
Believe that Stafford is being slowly destroyed by lack of planning;
Stafford lags behind in facilities for residents compared to other Towns and Cities;
Being "rushed through";
Money should be spent on increasing popularity of Stafford as a County Town to tourists;
Will residents be compensated for devaluation of properties caused by development;
Providing that major part of area sloping down the hill preserved, would not object to ribbon development along Falmouth Avenue;

Relevant Planning History

41076 - Proposed erection of 138 houses garages access roads and associated works - Refused April 2002.

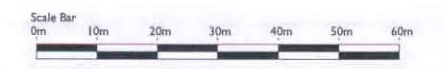
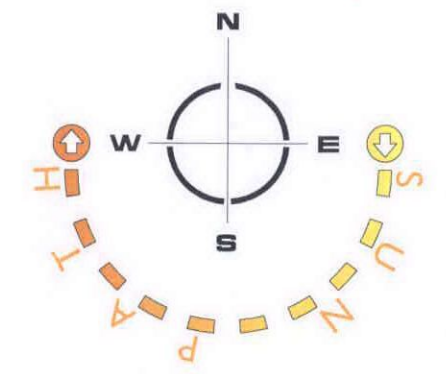
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Rev.	Drawn	Comments	Date



Overall site area
4.309 hectares or 10.65 acres

Proposed Site



RECEIVED
13 MAY 2014

hulmeupright MANCHESTER

Barclay House
35 Whitworth Street West
Manchester
M1 5NG
Tel: 0161 2445818 Fax:
Email: manchester@hu-arch.co.uk www.hulmeupright.co.uk

architects cdmco-ordinators
Client
Staffordshire County Council

Project
**Residential development,
Falmouth Avenue, Stafford**

Title
Site Location Plan

Status
PLANNING

Date **MAY 2014** Drawn **NJH**
Scale @A3 **1:1250** Checked

Project No **21284 - PL[0]23** Drawing No.
Rev

PLANNING

TON APRIL 2014\21284-30.DWG