

Seefeld  
Trent Road  
Stone  
Staffordshire ST15 8LE  
Telephone:

30th June 2016  
(delivered by email)

Mr Mike Fox BA (Hons) DIPTP MRTPI  
C/o The EiP Programme Officer  
Civic Centre  
Riverside  
Stafford ST16 3AQ

Dear Sir

#### **TOWN AND COUNTRY PLANNING ACT 1990**

#### **Representation – The Plan for Stafford Borough – Part 2: Examination in Public**

#### **Land to the North of Trent Road, Stone**

Further to the representation we made to The Plan for Stafford Borough Part 2 at the consultation stage objecting to the omission of the Land to the North of Trent Road, Stone from the Stone Settlement Boundary we now make the following representation for your consideration at the forthcoming Examination in Public.

This representation relates to a parcel of land to the North of Trent Road, Stone. (Appendix 1 – Site Location Plan).

#### **1. Background**

- 1.1 The principle of development of this site has previously been accepted and supported by The Stafford Borough Local Plan 2001. Paragraph 6.24 of the Planning Inspectors Report (Appendix 2) commented on the council's intention to exclude the site from the Stone Residential Development Boundary stated: *"I find it somewhat difficult therefore to comprehend the rationale behind the current stance, especially as the neighbouring industrial premises fall within the RDB. I accept the land is open at present. However because of the acceptance of its suitability for housing and its adjacency to a built-up area included in the town's RDB, I consider it would be both sensible and reasonable to retain the site in the RDB as shown in the Plan"*
- 1.2 Planning applications for residential development gained resolutions to grant both outline and detailed consent for the site in 1989 and 1990.

- 1.3 The council duly allocated the site for housing in the adopted Stafford Borough Local Plan 2001 under Proposal HP17 (Appendix 3). The site remained a housing allocation within Stone's Residential Development Boundary until June 2014, when The Plan for Stafford Borough 2011 to 2031 Inspector following the Public Examination, concluded in the Main Modifications that all Residential Development Boundaries should be removed.

## 2. The Current Position

- 2.1 The proposed settlement boundary as shown in the Stone Inset Map included within the draft Plan for Stafford Borough Part 2 now excludes the Land to the North of Trent Road, Stone, the subject of this representation.
- 2.2 However the land is shown as being within the urban area of Stone in the adopted Plan for Stafford Borough 2011 – 2031 Part 1 (Appendix 4)
- 2.3 The adjacent housing site on the south side of Trent Road was granted consent (after the developer lodged an appeal against the council's initial refusal to grant planning permission) on the basis that it was a sustainable location even though it was outside Stone's Residential Development Boundary and within the supposedly-protected Green Infrastructure.
- 2.4 The Land to the North of Trent Road is also a highly sustainable location; it is almost entirely surrounded by residential development; it is not in the Green Belt and all its boundaries are defensible. There would be no detrimental impact on the landscape.
- 2.5 Since my letter (Appendix 5) dated 4 January 2016 was submitted to the consultation process there have been two very important and significant decisions affecting the planning regime.
- 2.6 The first was the appeal decision dated 4th August 2015 Reference APP/H1840/W/15/3005494 Walcot Meadow, Walcot Lane, Drakes Broughton, Pershore, Worcestershire
- 2.7 This appeal decision makes absolutely clear (i) that in line with the Government's drive for more houses to be built to address the housing crisis the NPPF seeks to boost significantly the supply of housing and this attracts substantial weight to the Framework; (ii) a local planning authority's housing land supply and targets in local plans are to be regarded as minimums and not maximums; and (iii) regardless of a 5 year housing land supply being available the NPPF advocates a presumption in favour of sustainable locations and as the policies and objectives of the Framework are a material consideration that outweighs the development plan.
- 2.8 The second was the related High Court ruling *Wychavon District Council v. Secretary of State for Communities and Local Government* [2016] EWHC 592 (Admin) which upheld the appeal decision and this is now enshrined in case law.

- 2.9 There are unresolved objections to some aspects of the plan and as such only moderate weight can be attached to the draft Plan for Stafford Borough Part 2 which at the present time does not form part of the development plan.
- 2.10 A planning application 15/23033/OUT was submitted in October 2015 for 11 dwellings on the Woodland Fields part of the land
- 2.11 The Council's planning committee refused this application solely on the grounds that it would lead to too many houses being built in Stone (Appendix 6). This has to be balanced against the scale of the development which will have a deminimus impact on the overall spacial strategy of the Local Plan.
- 2.12 Another application with a revised layout also seeking outline planning consent for the eleven houses on the Woodland Fields site and also for 14 much-needed additional one- and two-bedroom affordable flats on the Woodland Court site will be submitted shortly.
- 2.13 Housing development on this land will constitute sustainable development having regard to the policies of the Framework taken as a whole and significantly boost the supply of housing in line with the NPPF. Furthermore in this instance, the benefits of development are sufficient to outweigh any limited harm that may be suggested by the council.
- 3.0 In line with the Framework's presumption in favour of sustainable development I respectfully request the Inspector to include the Land to the North of Trent Road, Stone within the Stone Settlement Boundary in the Plan for Stafford Borough Part 2.**

Yours faithfully

J Murfey Preston

Margaret JH Preston



6.23.7 The proposal would help to offset the deficiencies in housing provision I have identified and I acknowledge that the facilities, amenities and employment opportunities in Stone make it a suitable location for a degree of additional housing development. I accept that the objection site is close to Stone's town centre, its services and amenities; it is also within walking distance of the town's railway station. Residential uses are well represented in the vicinity and would be augmented if the proposed housing development on the north side of Trent Road proceeds. In addition, the prospect of improvements to Trent Road and the opening up of the riverside to public access, as described by the objectors, could also be beneficial.

6.23.8 However, while the foregoing factors lend support to the proposal, and I am mindful that development at Riverside would fall within the ambit of Policy HO4, my concern lies with the rest of the site which I find to be appropriately included in the Green Network. Rather than being rounding off as is suggested, my opinion is the proposal would be a significant and intrusive incursion into the valley floor. To my mind this would unacceptably erode the open quality of the land and would seriously diminish the contribution it makes to the distinctive form of Stone. Landscaping, as shown on the illustrative plan submitted by the objectors, would help ameliorate the impact of development here to a certain extent, but I do not consider this sufficient to overcome my concern.

#### Recommendation

6.23.9 *I recommend that no modification be made to the Plan.*

\*\*\*\*\*

## 6.24 STONE: LAND NORTH-WEST OF TRENT ROAD

Objection No: EN1413/09 J M Preston.

#### The Objection

- Inappropriate exclusion of land from Stone's RDB.

#### Conclusions

6.24.1 On the Stone Area Inset, the objection site, about 1.7 ha in extent, is shown as a housing commitment lying within Stone's RDB. In the Suggested Changes, it is proposed that the land be excluded from the RDB.

6.24.2 No reason for the apparent change of heart is given. Having read that the Council resolved to grant planning permission for residential development on the site subject

to the completion of Section 52 and 106 agreements in 1989 and 1991 respectively, the land's suitability as a housing site does not appear to be at issue. There is no evidence to suggest otherwise. I find it somewhat difficult therefore to comprehend the rationale behind the current stance, especially as the neighbouring industrial premises fall within the RDB.

6.24.3 I accept that the land is open at present. However because of the acceptance of its suitability for housing and its adjacency to a built-up area included in the town's RDB, I consider it would be both sensible and reasonable to retain the site in the RDB as shown in the Plan.

6.24.4 The amended text suggested by the Council would help to clarify the matter to some extent, but I prefer the provisions of the deposited Plan. In so saying, I have one slight reservation. As the planning permission had not been issued when the inquiry closed, my view is that it is not appropriate to regard the project as a true commitment. In the apparent absence of opposition to housing development here, my opinion is that if planning permission has not been forthcoming, consideration should be given to identifying the site as a housing proposal instead.

#### Recommendation

6.24.5 *I recommend that:*

- A. *insofar as Stone's RDB is concerned, no modification be made to the Plan.*
- B. *that the objection site be considered when making up the deficiency in the overall housing provision as a consequence of my conclusions regarding the Plan's housing figures and the sites proposed for housing.*

\*\*\*\*\*

#### 6.25 STONE: LAND OFF ECCLESHALL ROAD AND ADJACENT TO WALTON HEATH

Objection Nos: 1944/32 Second City Homes Limited; LO0057/01 G E Fletcher; LO0060/03 Hassall Homes (Mercia) Limited.

#### The Objections

- Land on the north side of Eccleshall Road should be allocated for housing.
- Land on the south side of Eccleshall Road should be allocated for housing.
- Land on the south side of Common Lane should be allocated for housing.

3.28

HP17 - Residential Development of Land North West of Trent Road, Stone

The Borough Council allocates the site shown as HP17 on the Stone Area Inset Map for residential development of 39 dwellings.

#### Location

3.28.1 The site is bounded to the north by Faireys Industrial Ceramics factory and to the south by Trent Road beyond which are open fields. The eastern boundary of the site adjoins existing residential property fronting Trent Road and Newcastle Road.

#### Description

3.28.2 The site extends to some 1.7 hectares (4 acres) of undulating grass land with a belt of trees on the northern part. The site is traversed by a small watercourse which divides it into two unequal parts, the smaller of which adjoins the A34.

3.28.3 A formerly licensed landfill site lies to the north east of the site and although some site investigation work has already been undertaken, the results of such work, together with any additional investigation required should be assessed before the development of this site for residential purposes is undertaken.

3.28.4 The site relates strongly to the Green Network. The northern boundary and the brook that runs through the site are bordered by a large number of mature trees. The site is separated from the roads to the east and south by strong hedgerows. There are also mature trees on the site to the east of the brook. Development of this site should take particular account of these features which should be retained and enhanced within the design of any development proposals.

Inspector's Recommendation

6.24.5 *I recommend that:*

- B. *that the objection site be considered when making up the deficiency in the overall housing provision as a consequence of my conclusions regarding the Plan's housing figures and the sites proposed for housing.*

3.28.5

3.20.4 *I recommend that:*

- i. *appropriate measures be taken so that all policies and proposals are clearly identified and distinguished from the supporting text;*
- ii. *the Plan be modified, where appropriate, by the insertion of cross referencing of the individual housing proposals to the proposed new Policy INT XX.*

3.28.6

3.28.7

Officers Response

It is recommended that the supporting text to Proposal HP17 comprising paragraphs 3.28.1 to 3.28.8 and the modifications to the Proposals Map shown on Plan 9 be accepted as a result of the Borough Council's allocation of the site.

3.28

### **Water Supply and Drainage**

- 3.28.5 Public foul water sewerage is available in Trent Road, however, some off-site reinforcement may be required depending on the number of houses proposed. There is no public surface water sewerage available. Surface water may be drained to the local land drainage system. The developer should liaise with the Environment Agency in respect of this and with Severn Trent Water concerning mains water supply for the site.

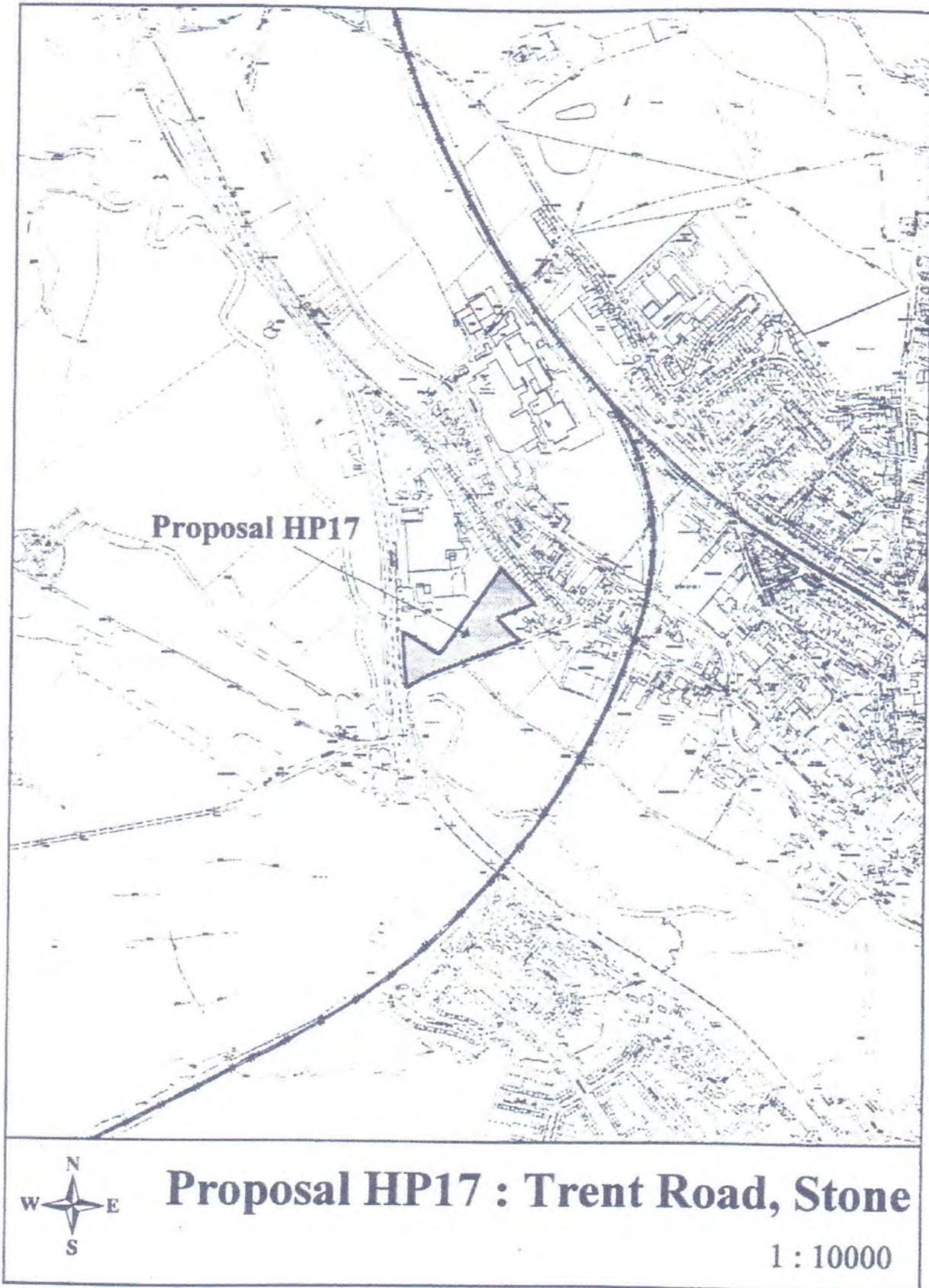
### **Highways and Access**

- 3.28.6 The Highways Agency has reserved the right to make representations with regard to the increase in traffic at the junction of Trent Road with the A34. It may be appropriate to consider closing this junction in liaison with the Highway Authority.
- 3.28.7 Pedestrian and cycle links between the site and the existing network are poor. The County Council as Highway Authority would wish to see the developer enter into an agreement to improve cycle and pedestrian links and if appropriate to improve the Trent Road/Newcastle Road junction.

### **Developer contributions and Planning Obligations**

- 3.28.8 Where it is necessary and appropriate to do so the Borough Council will seek contributions from the developer(s) of this site in accordance with policy INT1 "Planning Obligations".

# PLAN 9 : HP17



3.29

3.29.1

3.29.2

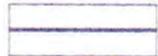
3.29.3

3.29.4

3.29.5

# Stafford Borough Local Plan 2001

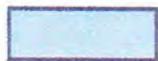
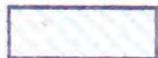
## Stone Area Inset

-  Residential Development Boundary
-  Town Centre Shopping Boundary

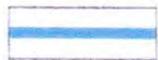
### HOUSING

-  Housing Proposal
-  Landscape Planting (Proposal HP14)

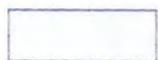
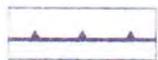
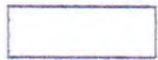
### EMPLOYMENT

-  New Employment Development Site
-  Committed Employment Site

### SHOPPING

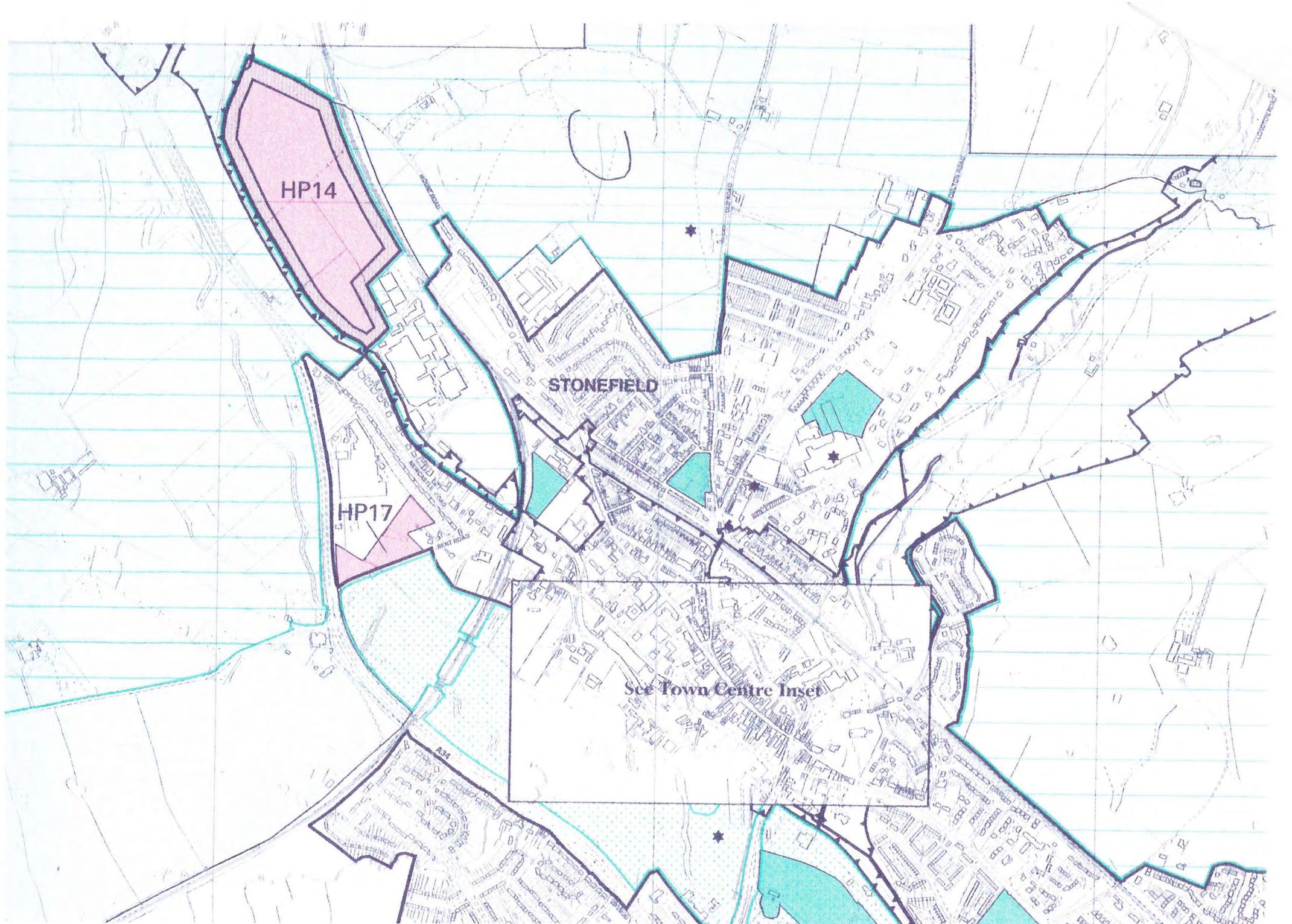
-  Primary Retail Frontage
-  Secondary Retail Frontage

### ENVIRONMENT

-  Green Belt
-  Green Network
-  Conservation Area
-  Special Landscape Area
-  Site in Sites and Monuments Record (Area)
-  Site in Sites and Monuments Record
-  Protected Open Space

### RECREATION, LEISURE & TOURISM

-  Proposal T1  
Trent and Mersey Canal



HP14

STONEFIELD

HP17

See Town Centre Inset

A34

clean rainwater. The site developer should liaise with Severn Trent Water Limited and the Environment Agency as appropriate with regard to these issues.

3.27.8 The Environment Agency have also advised that when former greenfield sites are developed, the increase in impermeable area can result in a reduction in soil moisture recharge leading to a reduction of ground water resources and an increase in pollutant loads carried in sewers or surface waters. Source control techniques (i.e. soakaways, swales and wetlands) should be emphasised in order to achieve more sustainable forms of development wherever possible.

#### Highways and Access

3.27.9 Staffordshire County Council (SCC) as Highway Authority has stated:-

A Traffic Impact Assessment will be required to:-

- Identify the most appropriate means of accessing the site and the improvements required to Common Lane to accommodate the development.
- Demonstrate the development traffic can be satisfactorily assimilated into the highway network with particular emphasis being given to the Walton Roundabout and B5026 Eccleshall Road.
- Identify the measures to encourage a modal shift with particular emphasis being given to accessing the site by public transport and provision of facilities to assist movement by cycle and walking.

3.27.10 The capacity of Walton Island at the junction of the A34 with Eccleshall Road was a major issue at the Public Local Inquiry.

3.27.11 The Highways Agency has strongly expressed its concerns with the capacity of the Walton Island, particularly in the context of other proposed and potential residential and employment developments elsewhere in Stone.

3.27.12 The Inspector however concluded that residential development at Eccleshall Road could be accommodated. SCC have accepted this, whereas the Highways Agency remain unconvinced, both however require further traffic impact assessment studies (TIAs) to be undertaken which should take into account the proposals at the Meaford, Stone Business Park and Whitebridge Lane sites. The developer should liaise with the Highways Agency as to its requirements in this respect. The SCC requirements are stated above.

#### Developer Contributions and Planning Obligations

3.27.13 Where it is necessary and appropriate to do so the Borough Council will seek contributions from the developer(s) of this site in accordance with policy INT1 "Planning Obligations".

3.28

#### *Proposal HP17 Residential Development of Land North West of Trent Road, Stone*

*The Borough Council allocates the site shown as HP17 on the Stone Area Inner Map for residential development of 29 dwellings*

#### Location

3.28.1 The site is bounded to the north by Faireys Industrial Ceramics factory and to the south by Trent Road beyond which are open fields. The eastern boundary of the site adjoins existing residential property fronting Trent Road and Newcastle Road.

#### Description

3.28.2 The site extends to some 1.7 hectares (4 acres) of undulating grass land with a belt of trees on the northern part. The site is traversed by a small watercourse which divides it into two unequal parts, the smaller of which adjoins the A34

3.28.3 A formerly licensed landfill site lies to the north east of the site and although some site investigation work has already been undertaken, the results of such work, together with any additional investigation required should be assessed before the development of this site for residential purposes is undertaken.

3.28.4 The site relates strongly to the Green Network. The northern boundary and the brook that runs through the site are bordered by a large number of mature trees. The site is separated from the roads to the east and south by strong hedgerows. There are also mature trees on the site to the east of the brook. Development of this site should take particular account of these features which should be retained and enhanced within the design of any development proposals.

#### Water Supply and Drainage

3.28.5 Public foul water sewerage is available in Trent Road, however, some off-site reinforcement may be required depending on the number of houses proposed. There is no public surface water sewerage available. Surface water may be drained to the local land drainage system. The developer should liaise with the Environment Agency in respect of this and with Severn Trent Water concerning mains water supply for the site.

#### Highways and Access

3.28.6 The Highways Agency has reserved the right to make representations with regard to the increase in traffic at the junction of Trent Road with the A34. It may be appropriate to consider closing this junction in liaison with the Highway Authority.

3.28.7 Pedestrian and cycle links between the site and the existing network are poor. The County Council as Highway Authority would wish to see the developer enter into an agreement to improve cycle and pedestrian links and if appropriate to improve the Trent Road Newcastle Road junction.

#### Developer Contributions and Planning Obligations

3.28.8 Where it is necessary and appropriate to do so the Borough Council will seek contributions from the developer(s) of this site in accordance with policy INT1 "Planning Obligations".

### Selected Settlements in Rural Areas

#### 3.29 Adbaston

3.29.1 This is a small settlement (see Inset Map No 1) with a population of about 156, in the west of the plan area approximately three and a half miles west of Woodseaves. The settlement is mainly composed of recent housing development with some older farm buildings, the Church and the Vicarage.

3.29.2 The settlement is surrounded by Grade 3 agricultural land except to the south where land is Grade 2.

3.29.3 Severn Trent Water have stated that this is an area of possible concern for water supply.

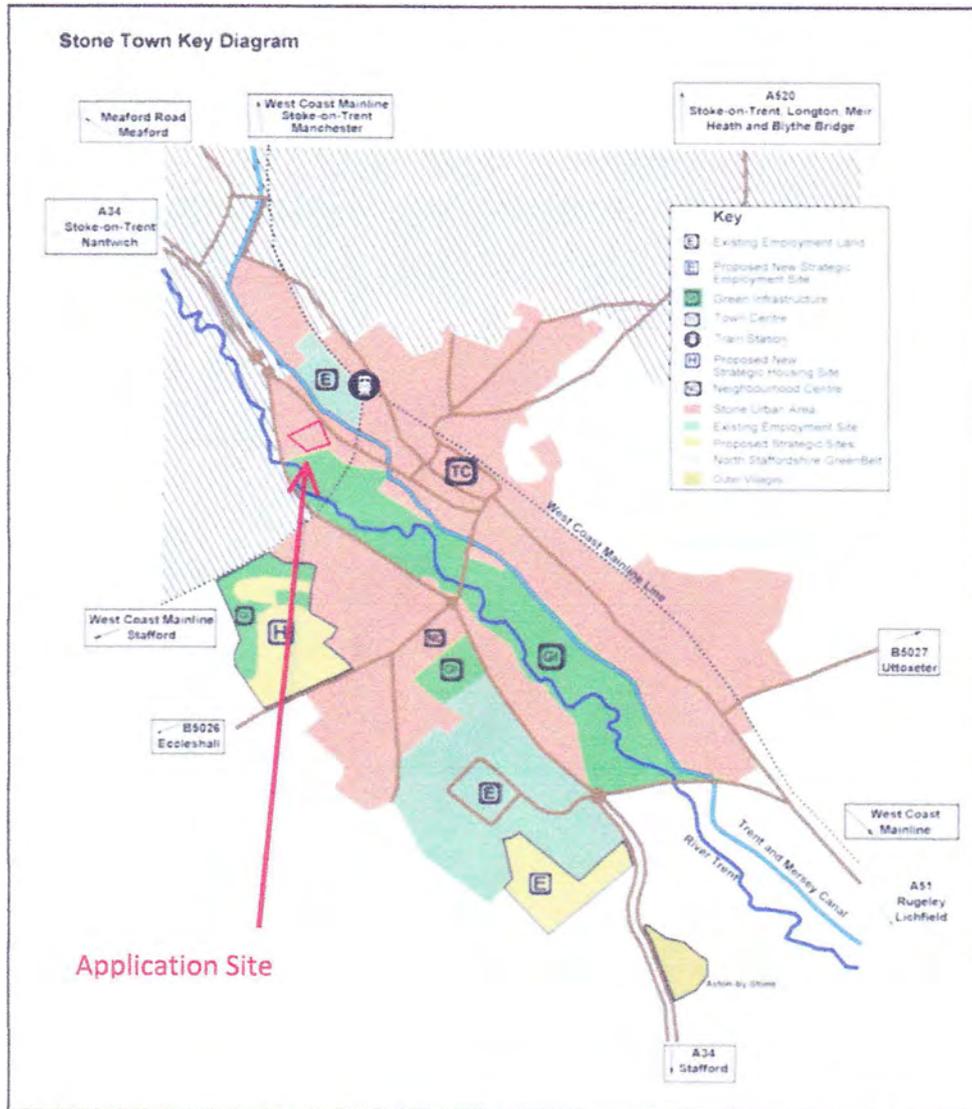
3.29.4 The Environment Agency have stated that a new sewage treatment plant is currently under construction which has a design capacity for 179 people. Any development resulting in an increase in population above this level may require improvements to the sewage treatment plant and STW should be consulted in this respect.

3.29.5 An RDB has been defined around the settlement for the purpose of policies HOU2 and HOU3.

#### 3.30 Aston by Stone

3.30.1 This is a small settlement (see Inset Map No 2) with a population of about 177, located south of Stone, about 1.5 miles from the A34. There is a small farm building and a house on the site.

Figure 3 – Stone Town Key Diagram



Source: Plan for Stafford Borough Part 1

# APPENDIX 5

Seefeld  
Trent Road  
Stone  
Staffordshire ST15 8LE  
Telephone:



4<sup>th</sup> January 2016

Mrs S Wright  
Stafford Borough Council  
Civic Offices  
Stafford ST16 3AQ

BY HAND

Dear Mrs Wright

PLANNING APPLICATION REFERENCE 15/23033/OUT – LAND NORTH OF TRENT ROAD, STONE

Thank you for your letter dated 16<sup>th</sup> December 2015; we are grateful to you for affording us the opportunity to comment on this planning application.

**WE SHALL BE GRATEFUL IF YOU WILL KINDLY COVER OUR TELEPHONE NUMBER AND SIGNATURES.**

We wholeheartedly support this application, not least because the site gained resolutions to grant outline and detailed planning consent in 1989 – over 25 years ago - and was allocated for residential development in the Stafford Borough Local Plan 2001. The long-established principle of this highly sustainable site, which serves no useful purpose, being found perfectly suitable for residential development is therefore undeniable.

The development proposed will help to provide the addition of size and type to the range of housing currently being built in Stone. When the scheme is fully designed we are proposing to include approximately 18 much-needed affordable homes on the adjacent land to the west. These will be for sale to genuine first time buyers at a price which will be subsidised by us with a further subsidy of 20% of the purchase price available on completion from the government.

We will also donate the small piece of land at the corner of the A34 and Trent Road to the Highway Authority. This will facilitate safer turning into Trent Road for southbound A34 traffic.

With regard to the site's status within Stone's Residential Development Boundary, the recently-proposed exclusion of the site from the Residential Development Boundary for Stone has yet to be tested before an Inspector at the Examination in Public. Faced with having to make exactly the same decision in 1989 the Stafford Borough Local Plan 2001 Inspector commented as follows: "I find it somewhat difficult therefore to comprehend the rationale behind the current stance, especially as the neighbouring industrial premises fall within the RDB. I accept the land is open at present. However because of the acceptance of its suitability for housing and its adjacency to a built-up area included in the town's RDB, I consider it would be both sensible and reasonable to retain the site in the RDB as shown in the Plan" (please see enclosure). The council duly allocated the site in the Stafford Borough Local Plan 2001.

The proposals in the application not only comply with NPPF guidance and will help meet the government's overarching and vital drive for very many more new homes to be built in sustainable locations such as this but also accord with District development strategy and policies. Sustainable

development for which there is a presumption in favour of development is at the very heart of the NPPF. The principle of residential development has been long-established on this sustainable site, which is outside the Green Belt, has defensible boundaries, was until very recently a long-standing housing allocation in the Stafford Borough Local Plan 2001 and is shown in the "Stone Town Key Diagram" in the adopted Plan for Stafford Borough 2011 - 2031 as being in the "Stone Urban Area."

We therefore respectfully request that your council grants outline planning consent for this application.



J Murrey Preston  
Enclosure



Margaret JH Preston



Mr Chris & James Jaram & Preston	Date Registered	14 December 2015
C/O Hewitt & Carr Architects	Decision Date	22 June 2016
FAO Miss Natalie Hewitt	Issue Date	24 June 2016
2-4 Cross Street		
Cheadle		
Stoke-on-Trent		
ST10 1NP		

## TOWN AND COUNTRY PLANNING ACT 1990

## REFUSAL OF PERMISSION FOR DEVELOPMENT

Application No:	15/23033/OUT
Proposed Development	Outline consent for residential development of up to 11 dwellings (including access)
Location	Land North Of Trent Road Stone Staffordshire
O. S. Reference:	389404 334271

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 proposed development is on a green field site adjacent to Stone. The Council can demonstrate a 5 year supply of housing land, including a 20% buffer. The Plan for Stafford Borough has demonstrated that for the plan period objectively assessed need can be fully met.

Although a proportion of the Borough's housing provision is required at Stone (10%) the amount of housing currently committed at this level of the hierarchy has exceeded this proportion. Approval of this application, therefore, would contribute towards a disproportionate amount of development taking place at this level of the sustainable settlement hierarchy. This would conflict with and undermine the development strategy set out in Spatial Principle 4 of the Plan for Stafford Borough



Mr Chris & James Jaram &  
Preston  
C/O Hewitt & Carr Architects  
FAO Miss Natalie Hewitt  
2-4 Cross Street  
Cheadle  
Stoke-on-Trent  
ST10 1NP

Date Registered 14 December 2015  
Decision Date 22 June 2016  
Issue Date 24 June 2016

TOWN AND COUNTRY PLANNING ACT 1990  
REFUSAL OF PERMISSION FOR DEVELOPMENT

and would not be in accordance with the genuinely plan-led approach  
advocated in paragraph 17 of the National Planning Policy Framework.

Head of Planning and Regeneration  
On behalf of the Council