



Eccleshall Parish Council

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Planning (Development Management)
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6th November 2025

25/41016/OUT - Outline planning permission with details of access for the development of up to 48 dwellings (Use Class C3) with associated infrastructure. Land South of Campion Close Eccleshall.

Eccleshall Parish Council have considered the details of the proposed development. **We recommend that the application be refused on the following grounds:**

- Paragraph 12 of the National Planning Policy Framework, December 2024 makes clear that *"The presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision-making."*
- The proposed development is outside of the settlement boundary and would set a precedent, leading to further incremental encroachment into the open countryside. It would also harm the rural and village character of the area, encroaching further into the open countryside.
- Acceptance of greenfield development would create further challenges to the viability of vacant brownfield or allocated housing sites within the borough.
- There are already infrastructure deficiencies including health, transport, drainage and secondary education. The proposal must be assessed in the context of other applications and allocations; if infrastructure is already under stress, additional development will obviously exacerbate problems.
- The proposed form and layout, even with mitigation, would result in intrusive visual impact, owing to the prominent location in an elevated position, flanked by open countryside.
- Development on previously undeveloped land will have a negative impact on surface water drainage and the wider water and flood management of the locality. Surface water flood issues are already a significant problem for Eccleshall, and this will exacerbate these by reducing the capacity for natural surface water management in the catchment area for the River Sow.
- The development of the site would result in the loss of grade 3a 'best and most versatile' agricultural land as demonstrated in the report 'Agricultural Land Classification, December

2024'. 45% of the development is 3a, comprising the entire field adjacent to Newport Road located centrally in the development.

- The development fails to deliver its Biodiversity Net Gain requirements, resulting in a proposed deficit of -32.77% for Habitat units, which may increase further as the Preliminary Ecological Appraisal was not undertaken in an optimal period.
- The development would result in the loss of 'ridge and furrow' heritage asset, which forms part of the historic agricultural character Eccleshall.
- It is contrary to national, Local Plan and Neighbourhood Plan policies as set out later in the representation.

Our rationale is set out below.

Sustainable Development

Paragraph 12 of the National Planning Policy Framework (NPPF), December 2024 makes clear that:

"The presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision-making. Where a planning application conflicts with an up-to-date development plan (including any neighbourhood plans that form part of the development plan), permission should not usually be granted. Local planning authorities may take decisions that depart from an up-to-date development plan, but only if material considerations in a particular case indicate that the plan should not be followed."

The lack of 5-year housing supply within the borough is not a material consideration that would enable consent as it conflicts with the growth strategy of the adopted Part 1 Local Plan as set out below.

Furthermore, as the proposed site is entirely outside of the defined settlement boundary, adopted Part 1 Local Plan Policy E2 (Sustainable Rural Development) sets 11 clear criteria where development in these locations will only be supported. The application fails to meet any of these criteria. This is also applicable for adopted Part 1 Local Plan Policy C5 (Residential proposals outside the settlement hierarchy).

Proportionate Growth and Cumulative impacts

The adopted Part 1 Local Plan Spatial Principle 3 sets the sustainable settlement hierarchy. Eccleshall is the third tier, identified as 1 of 11 key service villages.

Part 1 Local Plan Spatial Principle 4, identifies that key service villages will deliver 12% of the borough housing delivery. The adopted Local Plan allocates 537 new dwellings in the Plan period 2011-2031 across the 11 key service villages, noting that some of these settlements may take a higher proportion where there are not green belt constraints.

In context, since the Part 1 Local Plan was adopted Eccleshall has had 340 new dwellings granted permission to the period 31st March 2019. There have also been a further 54 new dwellings granted permission since this published data in the 2020 Options consultation. That takes the total percentage to in excess of 73%.

Clearly the parish of Eccleshall and the 'Key Service Village' has far exceeded a proportionate share of any growth to meet the borough need, even taking account of changes to national policy promoting further growth.

This application must not be considered in isolation. The cumulative impacts of recent and current developments, including the applicants other current live applications in close proximity are a material consideration. The submission documents do not take account of the substantial recent growth or propose any mitigation to address clear infrastructure needs within the village, including primary and secondary school places, which has already been raised in other representations to this application. Staffordshire County Council states there are insufficient school places in the local area to mitigate the impact of this development at primary, secondary and sixth form phases of education. Further development in this area would result in the need for an additional secondary

school at an indicative cost of £38,693,000, and potential for an additional primary school, although the additional places required at primary phase has not yet been fully determined.

Local Plan Part 1 Spatial Principle 4 makes clear that in meeting housing delivery targets, development should be supported by necessary infrastructure. Whilst the applicant would be subject to developer contributions as a borough wide strategy, the application does not propose or include any locally specific infrastructure benefits for new or existing residents of the community.

Encroachment into the Open Countryside:

Chapter 15 of the NPPF deals with conserving and enhancing the natural environment. Paragraph 198 makes clear that decisions should ensure that any new development is appropriate for the location, taking account of the natural environment as well as the site sensitivities and wider impacts of the development.

Under the **Local Plan Part 2**, settlement boundaries have been clearly defined to manage growth and prevent inappropriate development in the countryside. The application site is not within the defined settlement boundary. Granting permission would undermine the purpose of these boundaries and set a precedent for sporadic development across open countryside.

The proposal would have a harmful impact on the character and appearance of the countryside, which is inconsistent with Policy N8 (Landscape Character) of the Local Plan. The site forms part of an attractive rural landscape, and the introduction of built form would result in visual intrusion, loss of openness, and degradation of landscape character. The development is not well-related to any existing settlement form and would be prominent from surrounding public rights of way and roads due to its siting and local topography.

Surface Water Flood Risk:

Chapter 14 of the NPPF 'Meeting the challenge of climate change, flooding and coastal change' makes clear when determining applications that Stafford Borough Council should ensure that the flood risk is not increased elsewhere.

Paragraph 182 of the NPPF states:

"Applications which could affect drainage on or around the site should incorporate sustainable drainage systems to control flow rates and reduce volumes of runoff, and which are proportionate to the nature and scale of the proposal. These should provide multifunctional benefits wherever possible, through facilitating improvements in water quality and biodiversity, as well as benefits for amenity. Sustainable drainage systems provided as part of proposals for major development should:

- a) take account of advice from the Lead Local Flood Authority;*
- b) have appropriate proposed minimum operational standards; and*
- c) have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development."*

Taking account of this, the Environment Agency maps for planning shows the extent of the current surface water flood risk of the site. The area at risk is central in the site along the tree belt to the northern boundary of Langton Park. It is noted that the illustrative masterplan shows this as the location of the proposed attenuation pond.

Surface water flooding is a significant concern both to the Parish Council and wider community. Any drainage strategy must ensure that it deals effectively with all water management on site, including taking account of run-off rates as a greenfield site that play an important role in the wider water capture and flood management of the village.

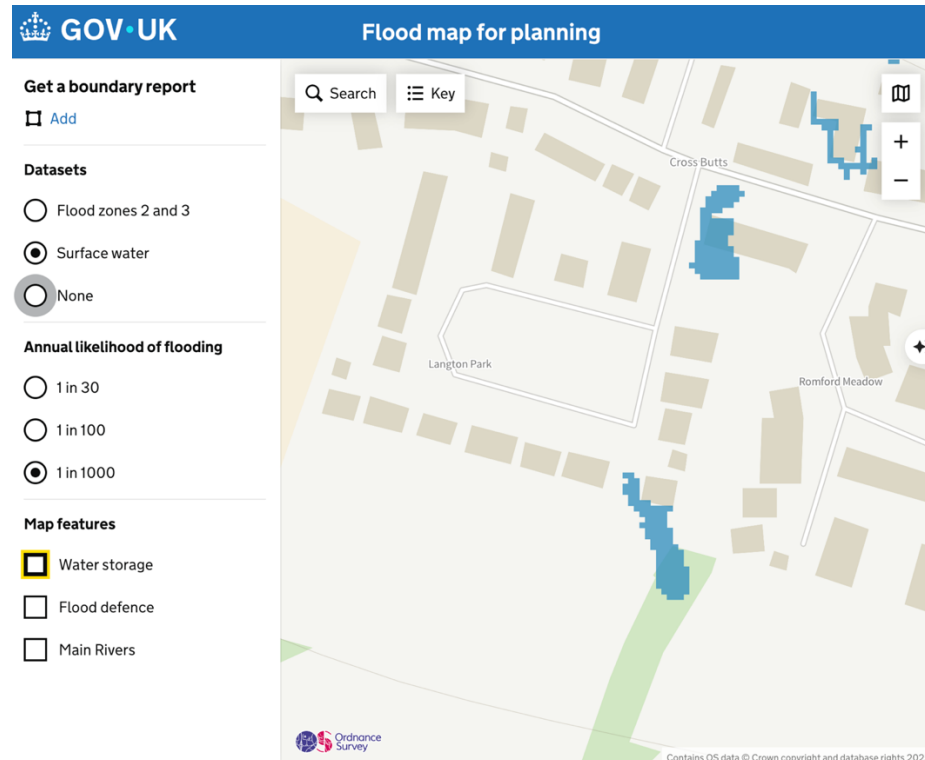
Severn Trent provided informal feedback in October 2025 as part of the research towards the review of the Eccleshall Neighbourhood Plan noting that:

"Management of surface water is an important feature of new development as the increased coverage of impermeable area on a site can increase the rainwater flowing off the site. The introduction of these flows to the public sewerage system can increase the risk of flooding for existing residents. It is therefore vital that surface water flows are managed sustainably, avoiding connections into the foul or combined sewerage system and where possible directed back into the natural water systems."

They also recommended that any new development should:

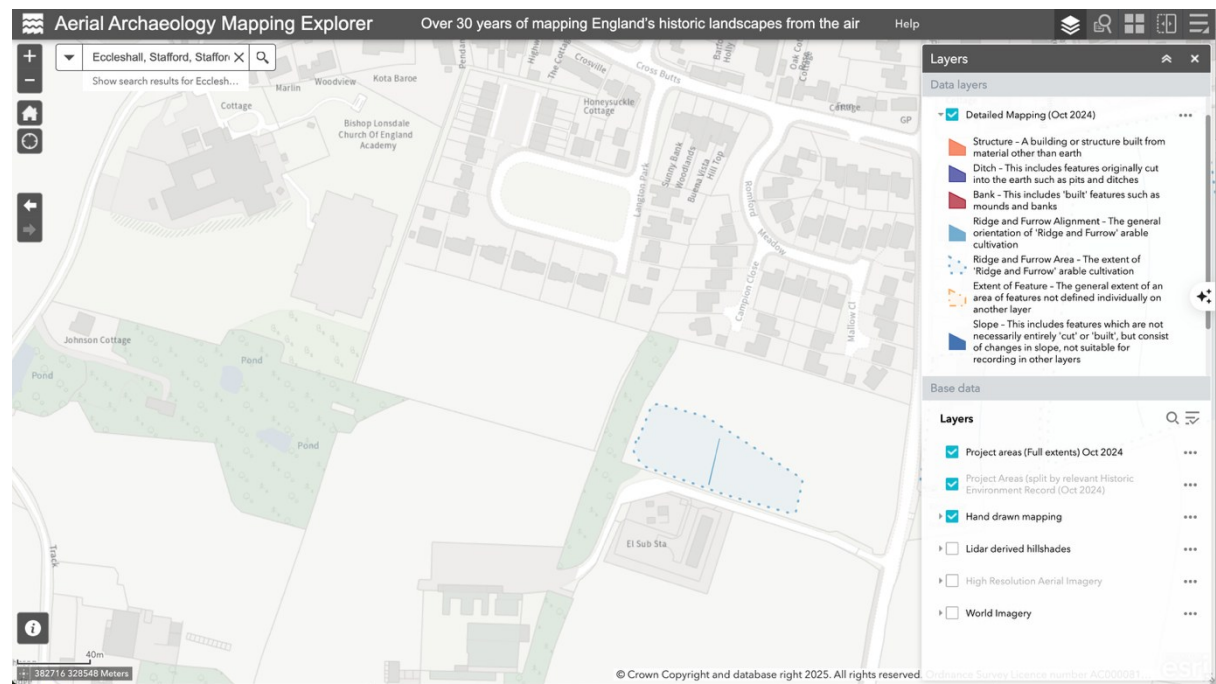
“demonstrate that all surface water discharges have been carried out in accordance with the principles laid out within the drainage hierarchy, whereby a discharge to the public sewerage system is avoided where possible.”

Any development should not be to the detriment of new or existing residents. To support Officers in decision making we have also included the extract from the Environment Agency flood map data (accessed October 2025) to illustrate the area.



Heritage Impacts:

The Historic England Aerial Archaeology Mapping Explorer demonstrates that the eastern parcel of land adjacent to Newport Road is heavily constrained by the 'ridge and furrow' area. The following extract taken from the map shows the extent of the area (accessed October 2025).



<https://historicengland.maps.arcgis.com/apps/webappviewer/index.html?id=d45dabecf5541f18255e12e5cd5f85a&mobileBreakPoint=300>

The Archaeological Report, May 2025 submitted with the application states:

“no evidence of ridge and furrow is recorded within its boundaries on the SHER”

This is clearly an error, and the report fails to consider the clearly defined extent ridge and furrow within the application site. There is insufficient evidence submitted to clearly understand the impact on the heritage asset or indeed how this has informed the development proposal.

Should the application be granted consent it would result in the loss of a heritage asset. This would be contrary to the NPPF, Chapter 16 'Conserving and enhancing the historic environment' makes clear in Paragraph 202 that heritage assets range from sites or buildings of local historic value to World Heritage Sites. It also recognises that these are irreplaceable.

Paragraph 207 states:

“In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting.”

The Parish Council request that the supporting information submitted by the applicant is updated to take full account of the correct extent of heritage assets within the proposed development and assess the proposals impact accordingly.

Paragraph 214 states that:

“Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a) the nature of the heritage asset prevents all reasonable uses of the site; and*
- b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and*

*c)conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and
d)the harm or loss is outweighed by the benefit of bringing the site back into use.”*

The application fails to demonstrate how it satisfies all the criteria of Paragraph 214 and therefore should be refused.

Other Material Considerations

Type and Mix of Homes: Whilst the application is outline with all matters reserved apart from access, we note the applicant's intention to provide a range of homes across the development. As the Parish Council expressed during the pre-application process there is an unmet need for homes suitable to downsize within the village. The Parish Council would welcome a range or mix reflective to best meet the needs of the current population including a large proportion suitable for downsizing. Bungalows with flexible internal arrangements or provision of extra care accommodation would be welcomed on the site.

Biodiversity Net Gain: Given the application is on previously undeveloped greenfield site it is exceptionally disappointing that the proposed BNG is currently -32.77% for Habitat units and just above the minimum threshold for Hedgerow units at 10.70%. It should be noted that indeed these figures may decrease with the PEA undertaken during the optimal seasons. This raises the question of whether the final application will meet the minimum 10% requirements for Hedgerows and clearly fails the Habitat units, requiring off-site contributions.

Vehicular Access: There are two proposed vehicular access. The one onto Newport Road is of significant concern owing to the speed and volume of traffic using the route.

The Parish Council shares the concerns of our community that the introduction of a new access for a residential development onto Newport Road could have a detrimental impact on highway safety. We wish to remind Officers that it is already a busy rural road, with traffic regularly exceeding the speed limit, particularly as they leave the village.

Developer Contributions: Should Officers be minded to support the application, we would recommend that any developer contributions sought were used towards the following local priorities or where appropriate included within the application site in any subsequent reserved matters application. The identified infrastructure priorities include:

On Site:

- Provision of any Biodiversity Net Gain should be delivered on site. Should this not be possible any off-site contributions should be made in close proximity to the site.

Off Site:

- Re-surface the community centre, car park with a permeable, durable surface.

In addition, we would also recommend that a controlled junction or traffic island be integrated into the design to address the concerns related to highway safety and enable the safe ingress and egress from the site onto Newport Road.

Conclusion

The proposal fails to meet the requirements of national policy, local plan policy or the policies of the Eccleshall Neighbourhood Plan, as set out in this representation.

Approving this application would create a precedent for further development in the open countryside, undermining the integrity of both the adopted Local Plan and the Borough's long-term spatial strategy. It would weaken the role of settlement boundaries and increase pressure on unallocated sites outside of settlement boundaries, with long-term consequences for the natural environment and local infrastructure.

There is no justification in this application to support departure from national, local plan or neighbourhood plan policy.

The Parish Council remain of the view that the greenfield site should not be developed. However, should the application be amended to remove the 'Best and Most Versatile' land that also includes the clearly defined heritage asset we may consider the principle of residential development that supports downsizing with bungalows or extra care housing to better reflect the needs of our rural community. This consideration would not indicate or imply support for development of the site.

In particular, we would emphasise the requirement of Section 38 of the Planning and Compulsory Purchase Act 2004, to determine planning applications in accordance with the policies of the statutory development plan, unless material consideration indicate otherwise. The statutory development plan includes the adopted Local Plan (Part 1 and 2) and the Eccleshall Neighbourhood Plan.

Kind Regards,

Stacey Worden
Clerk to the Council.
cc. Borough Councillors Peter Jones and Jeremy Pert.