



# Eccleshall Parish Council

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Mrs. S. Worden, 16, Newport Road, Great Bridgeford, Stafford ST18 9PR ☎ 01785 282296  
Email: [clerk@eccleshallparishcouncil.gov.uk](mailto:clerk@eccleshallparishcouncil.gov.uk)

## Sent by Email only

Planning (Development Management)  
Stafford Borough Council  
Civic Centre  
Riverside  
Stafford  
ST16 3AQ

22<sup>nd</sup> January 2026

**25/41516/OUT Outline planning application with all matters reserved (except for principal means of access), for development comprising up to 480 residential dwellings (Use Class C3), specialist housing for older people (Use Class C2 or C3), medical centre/primary care hub (Use Class E) and primary school (Use Class F.1), with associated open space, landscaping and other associated works including infrastructure, earthworks and drainage.**

**Land to West of Blurtons Lane, South of Stone Road, North of Stafford Road Eccleshall  
Stafford**

Eccleshall Parish Council have considered the details of the proposed development. **The Council strongly objects, and 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 and loss of high value landscape and biodiversity corridors. 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.
- The development of the site would result in the loss of Grade 2 ‘best and most versatile’ agricultural land.
- There are already infrastructure deficiencies relating to school places, public transport, highway capacity and drainage. The proposal must be assessed in the context of other applications and allocations; infrastructure is already under stress, additional development will obviously exacerbate problems.
- The proposed development, even with mitigation, would result in intrusive visual impact, owing to the prominent location outside of the settlement, isolated in the open countryside.

- The applicant has not provided a sequential test and there is no material reason to depart from this requirement.
- The proposed development fails to provide sufficient information in relation to drainage, downstream connectivity, capacity and impacts from surface water flooding into the proposed dwellings.
- 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 would result in harm and loss of heritage assets within the application site.
- 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:

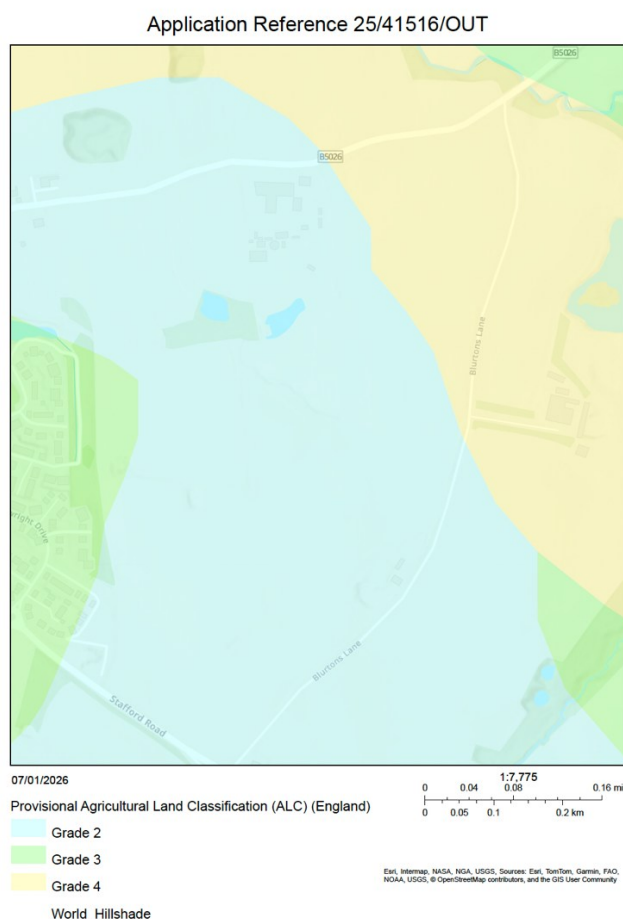
*“The presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision-making. Where a planning application conflicts with an up-to-date development plan (including any neighbourhood plans that form part of the development 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).

In addition, the site is also classified as Grade 2 agricultural land ‘best and most versatile’. There is a presumption against developing on greenfield sites that are classified as ‘best and most versatile’. The following extract shows the significant extent of the Grade 2 classification across the application site.

**Figure 1: Agricultural Classification Map**



### **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 31<sup>st</sup> 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 688%. If this application alone was granted consent the figure would increase in excess of 1,600%. Put simply that level of growth is unsustainable.

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.

Stafford Borough Council Strategic Planning and Placemaking Team also responded to this application stating that:

*"Therefore it is considered that such an increase is not appropriate for Eccleshall in the context of Spatial Principle 7 and criteria b)."*

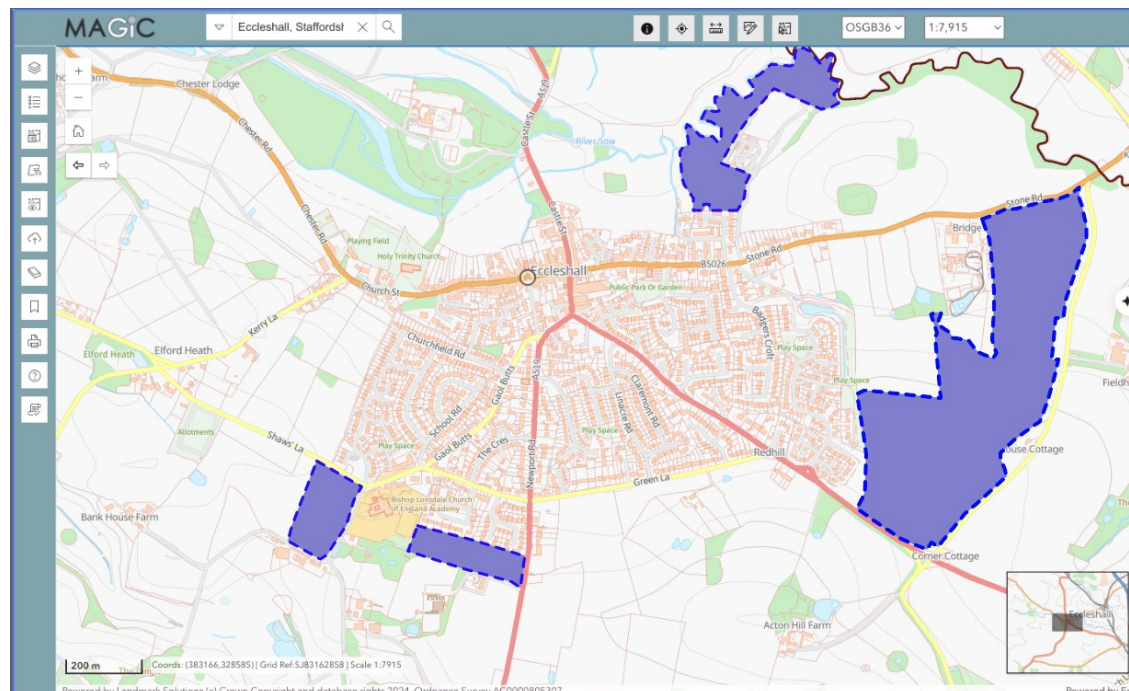
As this representation demonstrates the Parish Council also strongly supports this statement.

This application must not be considered in isolation. The cumulative impacts of recent and current developments, including the other 3 current live applications all outside of the settlement boundary

are a material consideration. The submission documents do not take account of the substantial recent growth or current position.

The following map illustrates the impact of the current live major residential applications all outside of the settlement boundary, shown in purple (please note this is indicative).

*Figure 2: Illustrative map of live major applications of residential development.*



#### **Encroachment into the Open Countryside and Landscape Character:**

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 outside of the settlement.

The Stafford Borough Council, 'Landscape Sensitivity Study, October 2021' identifies part of the application area as site reference ECC06 noting that it is of 'high/medium' landscape sensitivity with views and connection out to wider countryside on most boundaries with intervening fields between site and settlement. It also acknowledges 'high/medium' landscape value, skyline and settings and relationship with existing settlement form.

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 with high biodiversity value, and the introduction of built form in the open countryside and loss of historic field pattern including biodiversity green corridors and habitats would result in extensive visual intrusion, loss of openness, and degradation of landscape character and value. The development is not well-related to any existing settlement form and would have an urbanising impact, unrelated to the settlement in a sensitive landscape corridor.

In addition, Gentleshaw Wildlife Centre and Bird of Prey Hospital lies to the western boundary of the application site. The planning documents do not include a noise impact assessment or current land-use assessment to understand the impacts of the proposed developments on existing land-uses.

The proposed residential development is not considered a compatible land-use with the established substantial Gentleshaw Wildlife Centre and Bird of Prey Hospital. Wildlife centres should be located away from undue human disturbance to minimise animal stress. Proximity to residential areas is a key planning consideration for potential noise or odour complaints.

The Gentleshaw Wildlife Centre and Bird of Prey Hospital is deliberately located within the open countryside owing to the nature and activity of the site. There are amenity concerns for new residents in terms of noise and odour and then for the Gentleshaw Wildlife Centre and Bird of Prey Hospital in terms of impacts on loss of flying area for birds of prey being nursed at the hospital, impacts of construction in close proximity to the site on animals and wildlife, additional lighting (street lighting and that on new buildings) which could cause distress to animals and birds on site.

The British Wildlife Rehabilitation Council guidelines state that:

*“Facilities for convalescence and pre-release assessment will require sufficient space to allow the casualty to exercise.”*

In this location this includes flights for birds of prey across the adjoining agricultural fields to support and mimic their natural activities, undisturbed. The proposed development would result in the direct loss of this habitat. In summary, these land-uses are not compatible.

### **Flood Risk**

Paragraph 170 of the National Planning Policy Framework (NPPF), December 2024 makes clear that:

*“Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future).”*

The submission documents fail to include any mitigation against surface water flooding for new residents. There are areas of high surface water flood risk on and adjacent to the site, owing to the wider flood plain of the River Sow and topography of the area. The lived experience of our residents is that desktop analysis is not accurate or reflective of the current issues.

*Figure 3: Image of flooding that occurs on Blurtons Lane*

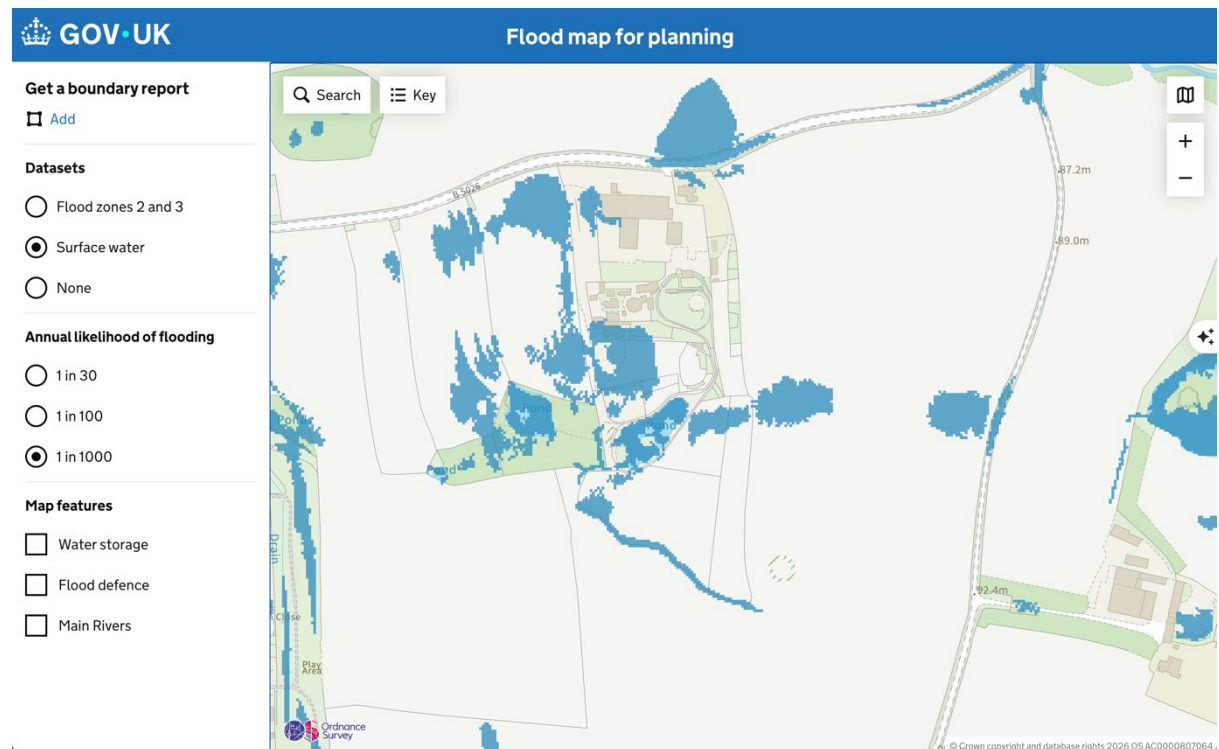


Indeed, we note and support the holding objections of Severn Trent and the objection and recommendation for refusal by the LLFA noting the lack of supporting evidence or suitable level of investigation to justify the drainage strategy.

Furthermore, it is noted the proposed attenuation ponds do not correlate with the areas of most significant surface water flooding. The following extract from the Environment Agency flood map demonstrates the areas of concern within and adjoining the site. This further supports our concerns about the lack of consideration of cumulative on and off site impacts and greenfield run-off.



Figure 4: Surface Water Flood Risk, Environment Agency, accessed January 2026



The NPPF Paragraph 173 states:

*“A sequential risk-based approach should also be taken to individual applications in areas known to be at risk now or in future from any form of flooding,”*

As demonstrated the site is at risk of surface water flooding. The ‘Flood Risk Assessment and Drainage Strategy, Revision C’, August 2025 states in paragraphs 3.7 and 3.8 that a sequential test is not required on the basis that the risk of flooding is low. This is clearly an error.

Paragraph 175 states:

*“The sequential test should be used in areas known to be at risk now or in the future from any form of flooding, **except in situations where a site-specific flood risk assessment demonstrates that no built development within the site boundary, including access or escape routes, land raising or other potentially vulnerable elements, would be located on an area that would be at risk of flooding from any source, now and in the future (having regard to potential changes in flood risk).**”*

The supporting indicative site layouts all show areas of proposed built development within areas of surface water flood risk now and the LLFA has concerns about the risk to future residents and properties. There is a clear and justified need for a sequential test. There is no material reason to depart from this requirement.

#### Heritage Impacts:

The Historic England Aerial Archaeology Mapping Explorer demonstrates that predominantly the site is heavily constrained by a number of ‘ridge and furrow’ heritage assets within the application site. The following extract taken from the map shows the extent of the area (accessed December 2025).

Figure 5: Extract from the Historic England Aerial Archaeology Mapping Explorer

The 'Heritage Statement', July 2025 submitted with the application make reference to '*Historic mapping demonstrates that the Site has remained undeveloped and in use as agricultural land to the present day.*'

There is currently insufficient evidence submitted regarding the 'ridge and furrow' heritage assets that have not been considered or indeed their loss justified.

*“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:*

The application fails to demonstrate how it satisfies all the criteria of Paragraph 214 and does not include substantial public benefit to outweigh any harm or potential loss, therefore should be refused.

The application is supported by a Travel Plan. Section 5 addresses the anticipated trip generation and modal splits for the proposed development. The Parish Council note in paragraph 5.3 the claim that up to 26% of private car journeys will be car share. There is no evidence that 'car share' schemes in rural communities work effectively. It would appear that the Travel Plan is based on

assumptions for an urban context. This is further illustrated in the predicted 50% travel by sustainable modes. Public transport is exceptionally limited and the site is not served by any public transport, there is a limited bus service in Eccleshall with 3 services there is no rail station. Equally active travel including cycling is not safe as there are no cycle links or network in Eccleshall.

The Parish Council also has significant concerns relating to the severe impact on highways safety, related pedestrians and vehicles exiting the site and existing minor roads parallel to the site with the significant additional traffic movements the development include. Taking account the Travel Plan only anticipates 58% of residents driving it already calculates over 2,000 additional journeys on the network. This does not include all the other journeys and traffic movements associated with the other uses proposed or take account of householder trends with delivery services for food and other services.

The additional traffic into the Main Highway Network (MHN) is also of concern not just within the local vicinity but the connections to other significant routes necessary for wider journey's.

The true extent of the impact of the proposed development has not been accurately reflected or calculated. The 'Transportation Report' makes clear these unknown elements stating:

*"At the time of writing, recent traffic survey data for the M6 J14 is not available, and new surveys cannot currently be undertaken as there are long-running roadworks on the A34 to the north-east of the junction that include road closures, diversions etc. and would therefore likely influence regular traffic patterns at the junction. Information obtained on the roadworks suggest that they will continue until at least December 2025.*

*Whilst it is therefore not possible to identify the operational impact of proposed development traffic at the junction, it is possible to quantify the predicted number of peak hour trips likely at the junction as a result of the proposed development. It is predicted that the proposed development would generate in the region of 100 additional vehicle journeys through the junction during the typical weekday peak hour. Further discussions on the impact of development generated traffic at the junction will therefore be held with National Highways and SCC once the application is submitted."*

Clearly the application is premature as they do not have accurate recent data and have not engaged National Highways or Staffordshire County Council Highways prior to submission.

## **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 significant 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 also result in the loss of Grade 2 agricultural land 'best and most versatile'.

It would weaken the role of settlement boundaries and increase pressure on unallocated substantial unsustainable sites outside of settlement boundaries, with long-term consequences for the natural and historic environment and local infrastructure.

There is no justification in this application to support departure from national, local plan or neighbourhood plan policy to support development of a previously undeveloped site separate from any settlement.

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.