



Eccleshall Parish Council

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Sent by Email only

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

19th March 2026

25/41542/OUT Outline planning application with all matters reserved (except access) for the erection of up to 150 residential dwellings (Use Class C3) with associated public open space, landscaping, sustainable urban drainage, parking, access roads, and associated development

Land to the North of Shaws Lane, Eccleshall, Stafford

Eccleshall Parish Council have considered the details of the proposed development.
The Council 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 result in the loss of high value landscape, biodiversity corridors and have a negative impact on the wildlife and flora and fauna. 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 3a ‘best and most versatile’ agricultural land.
- The application involves the loss of established mature hedgerows and includes significant deficit in watercourse BNG with a predicted 79.89% loss, resulting in a significant loss to the habitats and wildlife these areas support. The development would have an overall substantial detrimental impact.
- 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 on a hilltop, 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 would result in harm and loss of heritage assets within the application site.
- The removal of hedges along Shaws Lane to facilitate the access would change the character of the rural lane, 'urbanising' the edge of settlement.
- There is no pedestrian footway or active travel route from the proposed entrance to the existing village or recreational spaces. Therefore, it is unsustainable in terms of highways considerations.
- 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).

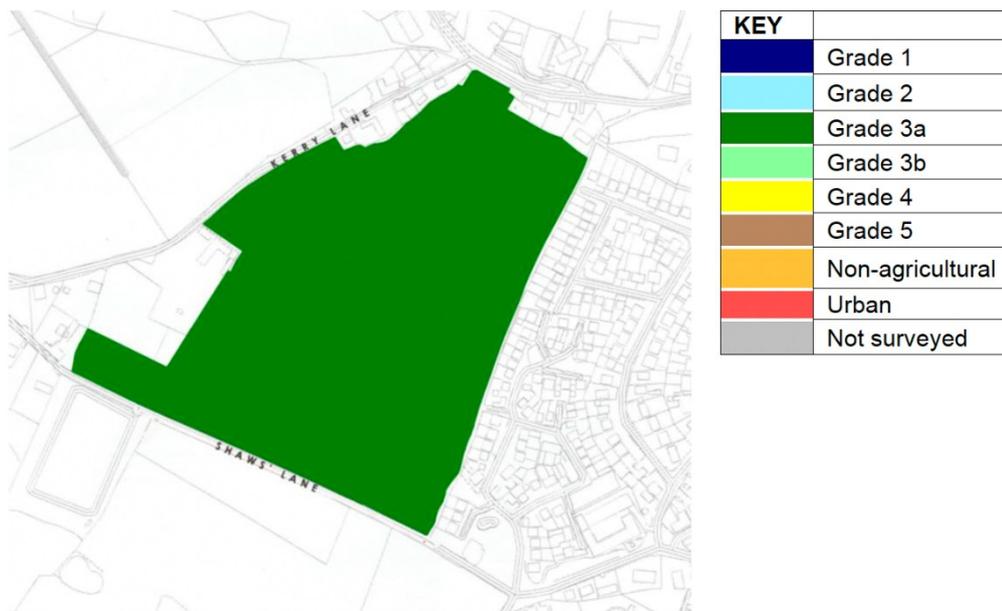
The representation by Stafford Borough Council Strategic Planning and Placemaking Team acknowledges that:

“based on the adopted Plan for Stafford Borough and Spatial Principle 7 the principle of new development in this location is not appropriate as it is outside of the settlement boundary for Eccleshall.”

In addition, the site is also classified as Grade 3a 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 taken from the submitted 'Agricultural Land Classification and Considerations report, September 2025' shows the entire site is classified as Grade 3a 'best and most versatile' agricultural land.

Figure 1: Extract from Applicants 'Agricultural Land Classification and Considerations report, September 2025'

Insert 2. Extract of the ALC Plan



3.8 As can be seen from the above, the Site is made up wholly of Subgrade 3a, therefore the Site contains BMV agricultural land.

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 688%. If this application was granted the level of growth is unsustainable and would put further undue additional pressure on infrastructure.

Clearly the parish of Eccleshall and the 'Key Service Village' has already 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:

“Taking into account NPPF paragraph 11 and the full weight of Spatial Principle 7 criteria c) to e) at this stage the planning policy position is not to support planning consent..”

The representation also makes clear that there are also a number of other material considerations that should be taken into account.

This application must not be considered in isolation. The cumulative impacts of recent and current developments, including the other 5 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 and planning pressures in our rural community from speculative, ad-hoc un-planned development proposals.

Eccleshall Village currently has key infrastructure deficiencies, and many services are already at capacity. This includes and not limited to primary and secondary school education, highway capacity at key interchanges in the village and safe water treatment and capacity in the network at the Sturbridge Treatment Works.

Staffordshire County Council have recently responded on the 16th February 2026 on another speculative application reference 25/41015/OUT stating that:

“We are aware of significant developer interest in land in and around Eccleshall for speculative development. Considering each application individually will impact on primary education infrastructure not being fully addressed.”

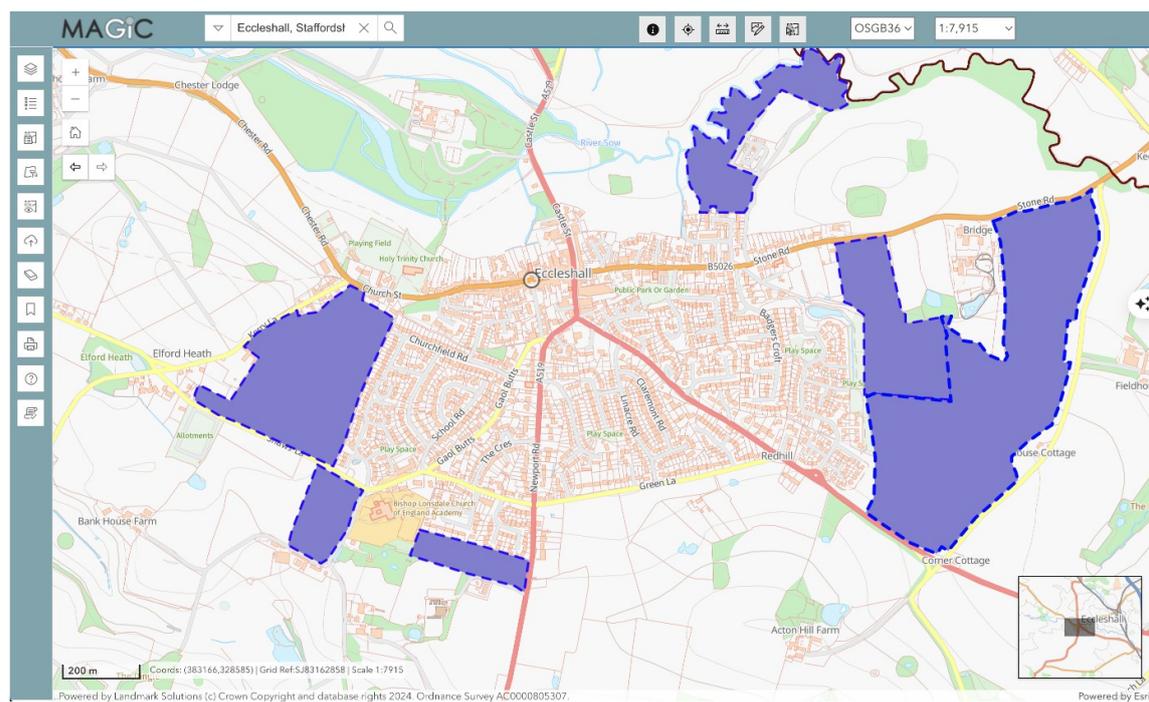
This clearly demonstrates the risk of piecemeal speculative development and cumulative impacts on a rural community and its already strained infrastructure.

Furthermore, Stafford Borough Council Strategic Planning and Placemaking Team made clear that:

“at the start of the adopted Plan period on 1 April 2011 the existing settlement of Eccleshall had 1,379 houses so has already experienced an increase of 24.4% to reach 1,716 houses by 1 April 2025. This compares with an overall 12% spatial distribution for all of the Key Services Villages. Therefore it is considered that such an increase is not appropriate for Eccleshall in the context of Spatial Principle 7 and criteria b).”

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.

Furthermore, the site includes historic landscape features that positively contributes to the landscape character and the understanding of the historic settlement of Eccleshall. This would be lost if permission was granted. The applicant acknowledges in the 'Historic Environment Desk-based Assessment', August 2025 the positive contribution that the site makes in the understanding of the historic landscape context of the settlement.

The Stafford Borough Council, 'Landscape Sensitivity Study, October 2021' identifies the application area as site reference ECC14 concluding the overall site sensitivity as 'High'. In particular the assessment notes there is particularly high sensitivity for 'skyline and settings' and 'views to and from important landscape and cultural heritage features'. It also concluded that 'significant effects are predicted and mitigation unlikely to be possible'.

As this representation makes clear later the importance of the historic landscape setting and character and how the settlement of Eccleshall is understood is negatively impacted and would cause the loss and harm of the valuable historic landscape character. Furthermore, in an attempt to mitigate impacts and harm to the Conservation Area, the proposed development is focused on the highest part of the land. As the Landscape Assessment recognises, views and topography are of high sensitivity. Therefore, the proposed development is harmful and would erode this character, setting a precedent.

On balance clearly 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 important historic landscape, including biodiversity green corridors and habitats would result in extensive visual intrusion, loss of openness, and degradation of landscape character and value. The development would have an urbanising impact, unrelated to the settlement in a sensitive landscape corridor.

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)."

There are areas of high surface water flood risk adjoining 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 reflective of the current issues. There are properties that have been flooded in recent years adjacent and adjoining the site.

It is unclear if the proposed strategy takes account of the cumulative impact of surface water flooding in the area or simply the site. Our concerns relate to the consideration of cumulative off-site impacts and greenfield run-off developing on agricultural land.

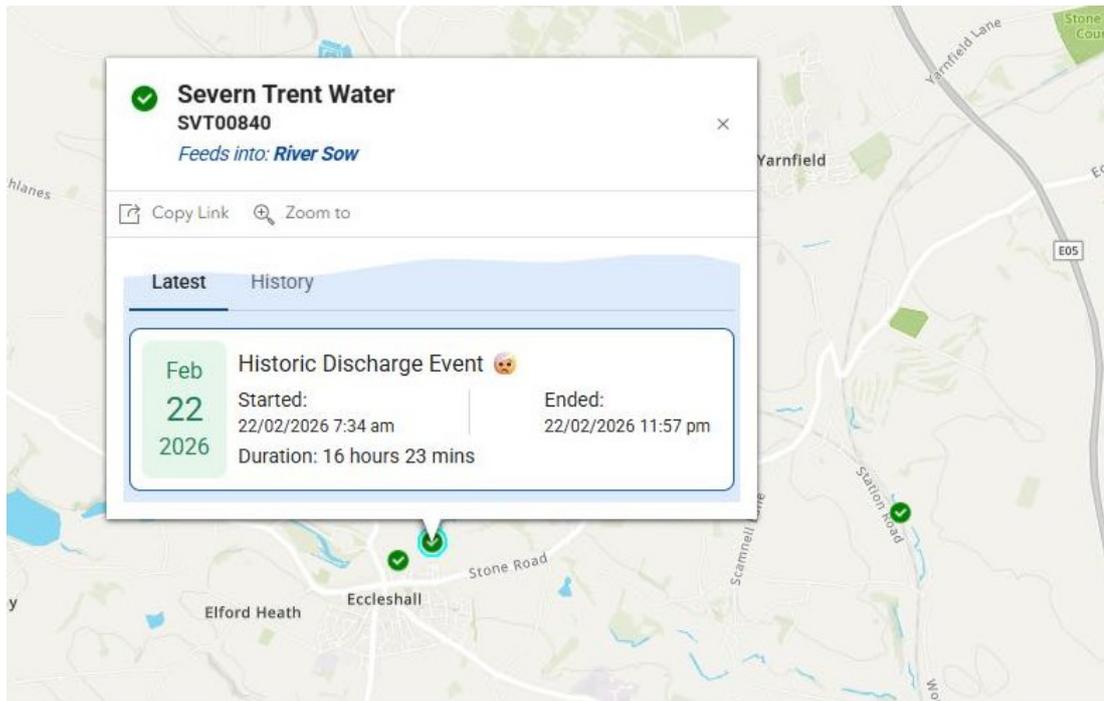
Water Quality, Water Treatment Capacity and Drainage:

EPC understand from recent published data that the current Severn Trent Eccleshall and Sturbridge Treatment Works released foul water discharge on 22nd February 2026 for 16hrs and 23minutes into the River Sow. We also note that the permit for Severn Trent to discharge into the River Sow expired on the 24th March 2002 and any current and historic discharges are unlawful.

Clearly any further development within the catchment for the treatment works will have an additional detrimental impact and could result in further and more extensive discharges into the river network. Furthermore, the drainage capacity on the proposed development will also likely result in capacity overflows and contribute to surface water flooding in the wider area including Castle Street and Stafford Street.

This should not be allowed. The following figure shows the published data relating to the event.

Figure 3: Water Treatment River Discharge Record



Heritage Impacts:

The Historic England Aerial Archaeology Mapping Explorer demonstrates that the site is heavily constrained by a number of 'ridge and furrow' heritage assets within the application site. The extract on the following page is taken from the map shows the extent of the area (accessed February 2026).

The 'Historic Environment Desk-based Assessment', August 2025 submitted with the application acknowledges 'ridge and furrow' heritage assets, however not those on site. It fails to consider the impact of the development on them or justify their loss. Stating on page 29 that there is no evidence for ridge and furrow, this is based on the desk-top study. As the extract demonstrates in figure 4, this is an error.

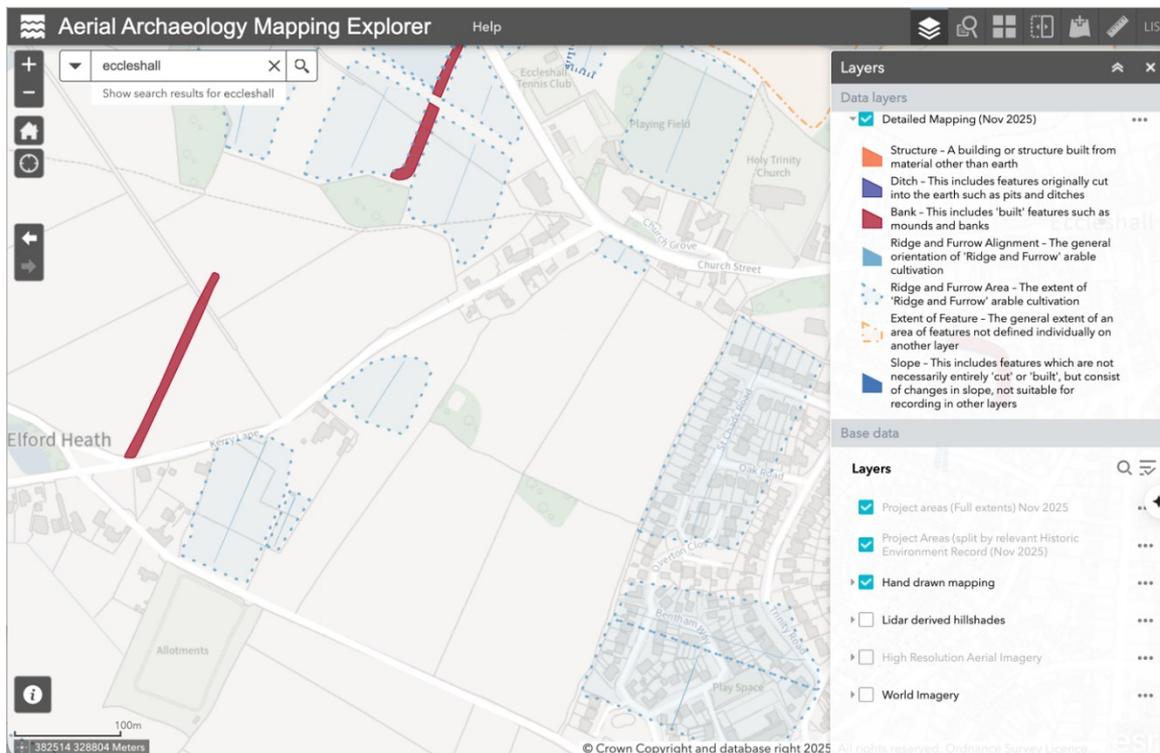
The application is contrary to the NPPF, Chapter 16 'Conserving and enhancing the historic environment' makes clear in Paragraph 214 that:

"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 does not include substantial public benefit to outweigh any harm or potential loss, therefore should be refused.

Figure 4: Extract from the Historic England Aerial Archaeology Mapping Explorer



It is also noted that the Conservation and Heritage Officer acknowledges the significance of the historic landscape character and the features within the application site as discussed previously in this representation, highlighting that the applicant states in the Historic Environment Desk-based Assessment', August 2025 that:

“The area to the south-west of Eccleshall which includes the proposed development site, remains in agricultural use and provides a positive contribution to the setting as it enables an understanding of the historic landscape context of the settlement.”

There is no justification for the harm the application would cause to the historic landscape setting and context of the historic village of Eccleshall and the Conservation Area.

EPC support the summary of the Conservation Officer who notes:

“In summary, the site forms an integral part of the historic, rural, agricultural setting of the Conservation Area, directly referenced in the appraisal through its description of rural approaches, field systems, and westward pastoral views. This context is essential to understanding Eccleshall’s historic development and the significance of the Conservation Area.”

The Historic Environment Desk-based Assessment submitted with the application does not take account or consider the impact on the setting of heritage assets should the application be approved. Given the inaccuracies, loss of onsite heritage assets, and acknowledgement of the importance of the historic landscape character the scheme would clearly cause harm.

Natural Environment and Biodiversity

EPC note the application involves the loss of established mature hedgerows and most concerningly includes significant deficit in watercourse BNG with a predicted 79.89% loss. This is not a marginal difference but a clear rationale for refusal as it results in a significant loss onsite and to the wider environmental blue and green infrastructure and the habitats and wildlife these areas support. The calculation is not just detrimental for watercourse but the wider natural environment and its overall substantial detrimental impact.

While the applicant offers off-site contributions to mitigate the loss, on a speculative application the presumption cannot be to accept mitigation and loss at such a level. In doing so it would set a clear and dangerous precedent.

The NPPF makes clear in Paragraph 195 that:

“The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.”

The BNG element is a clear demonstration of the adverse effect of the proposed development in an established mature rural landscape, which supports a range of wildlife and birdlife (including breeding Red Kites that feed on the site and nest in nearby areas), flora and fauna.

Traffic and Vehicular Access

The proposed vehicular access is onto a narrow carriageway and rural lane. The proposed highway alterations to facilitate the access would have an urbanising impact on the edge of settlement and only propose part improvements. There is also a lack of consideration of right-turn movements out of the development and the impact of other adjacent applications in close proximity to the site.

There is no pedestrian footway or active travel route from the proposed entrance to the existing village. Therefore, it is unsustainable in terms of highways considerations.

The Parish Council shares the concerns of our community that any additional traffic movements taken along Shaws Lane and Kerry Lane could have a detrimental impact on highway safety, with particular reference to the primary school and associated vehicular movements at peak times. Equally the safety of young people at the school is paramount and those accessing the nearby recreational space at Elford Heath, for which there is no consideration of a pedestrian route.

We wish to remind Officers that it is already a busy, narrow rural road at national speed (60mph) which forms part of a circular walk for many residents around the village and both routes have no footway.

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 'best and most versatile' agricultural land.

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.