



# Eccleshall Parish Council

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## Sent by Email only

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

5<sup>th</sup> March 2026

**25/41443/OUT Outline planning application with all matters reserved, except for access for the development of up to 140 dwellings, drainage and open space with associated works.**

### **Land South of Stone Road, 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 loss of high value landscape, biodiversity corridors and areas for Bat foraging along hedgerows and wooded areas. 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, in the 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.
- 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.

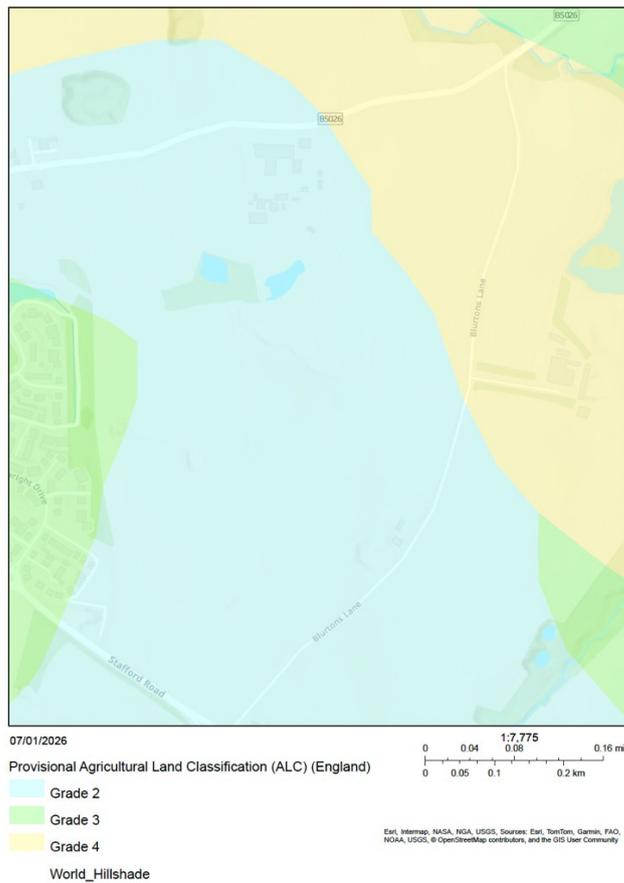
Furthermore, as the proposed site is entirely outside of the defined settlement boundary, adopted Part 1 Local Plan Policy E2 (Sustainable Rural Development) sets 11 clear criteria where development in these locations will only be supported. The application fails to meet any of these criteria. This is 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 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, as the Forward Planning Team made clear since the Part 1 Local Plan was adopted in Eccleshall to 31<sup>st</sup> March 2025:

*“the existing settlement has 1,716 houses and 32 new homes with planning commitments. Therefore, up to 140 new residential units would result in an 8% increase in the size of the settlement and cumulative 54% increase when taken together with other sites amounting to 804 units currently subject to the planning application process.”*

Put simply that level of growth is unsustainable in a rural village.

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 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 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.”*

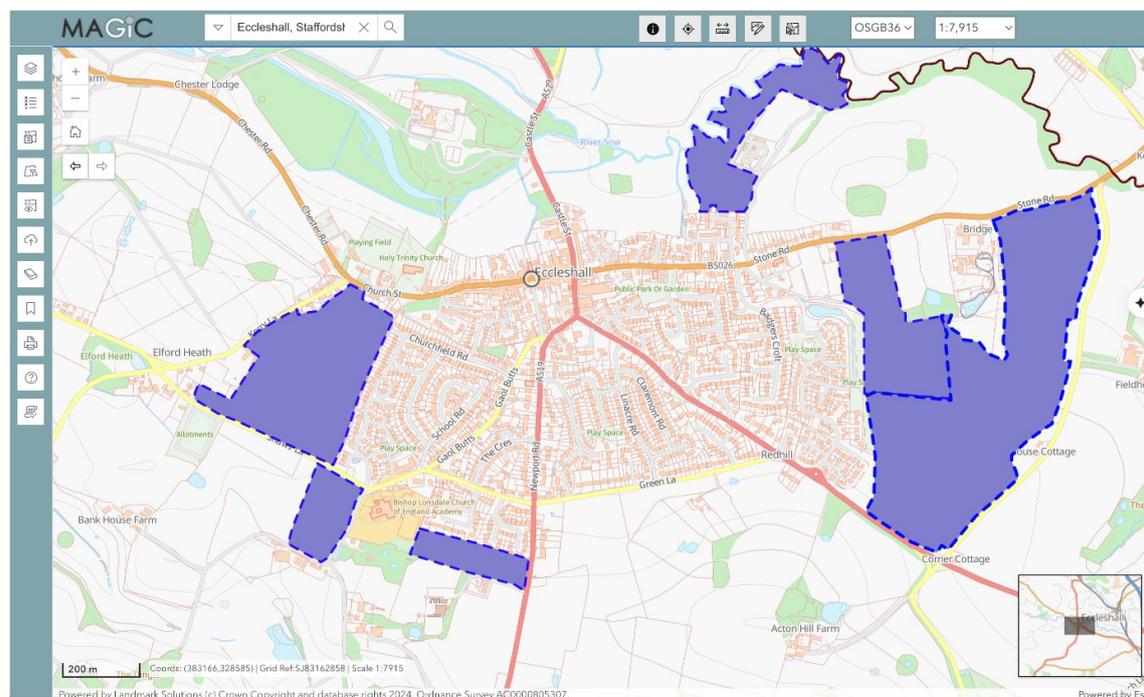
This clearly demonstrates the risk of piecemeal speculative development and cumulative impacts on a rural community and its already strained infrastructure.

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

*“When taken alongside other current planning applications at Eccleshall this results in a 54% increase in the size of the settlement which is not considered acceptable within the context of Spatial Principle 7 criteria a) and 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 contribute to the landscape character and the understanding of the historic settlement of Eccleshall. This would be lost if permission was granted. Features such as hedgerows, historic field patterns and piecemeal enclosure that includes the locally distinctive character of curving boundaries. These are recorded in the Staffordshire County Council Historic Environment Record (HER) and also referred to in the representation from the Conservation and Heritage Officer.

The Stafford Borough Council, 'Landscape Sensitivity Study, October 2021' identifies the application area as site reference ECC02 noting that it is of 'medium' landscape sensitivity with 10 of the 13 criteria.

The submitted 'Landscape and Visual Impact Assessment, October 2025' states:

*"No cumulative developments have been identified, that are approved or allocated, within the vicinity of the Site which would require cumulative assessment that would affect the findings of this assessment."*

Clearly this is an error as Figure 2 of this representation demonstrates. Furthermore, paragraph 2.12 of the 'Planning and Affordable Statement, November 2025' states:

*"We are also aware of two other proposals being developed for residential development within the village. At the time of writing, neither had yet formally been submitted to the LPA for consideration. Bloor Homes is consulting on a large "East of Eccleshall" scheme on land between Stone Road and Stafford Road, immediately adjacent to the application site, covering approximately 25 hectares immediately east of Sancerre Grange. The emerging indicative masterplan sets out how up to 500 homes together with a new primary school, health centre for the Crown Surgery, and extensive green/open space could be provided on the site. Bloor anticipates submitting a formal outline application in autumn 2025."*

This demonstrates the flaws in the supporting submission documents as they are not consistent and fail to accurately consider material considerations such as heritage and landscape. In addition, it should be noted that the Bloor Homes application referenced in the quote is now a live planning application reference: 25/41516/OUT.

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 historic field patterns 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.

The proposed residential development is also 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 and other current adjoining proposals would result in the entire direct loss of this habitat. In summary, these land-uses are not compatible.

### Flood Risk

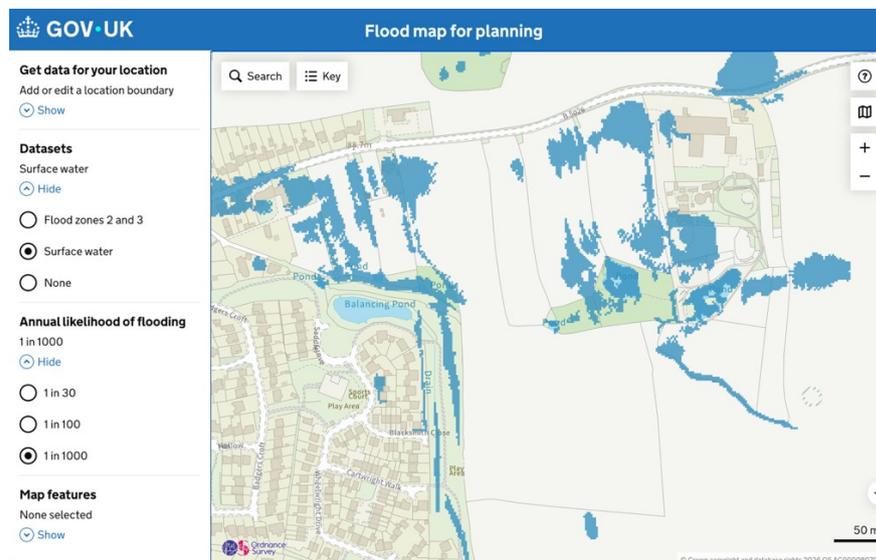
Paragraph 170 of the National Planning Policy Framework (NPPF), December 2024 makes clear that:

*“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 include a mitigation strategy to deal with 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. It is unclear if the proposed strategy takes account of the cumulative impact of surface water flooding in the area or simply the site.

Furthermore, it is noted the proposed infiltration basins (1 and 2) 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 3: Surface Water Flood Risk, Environment Agency, accessed February 2026



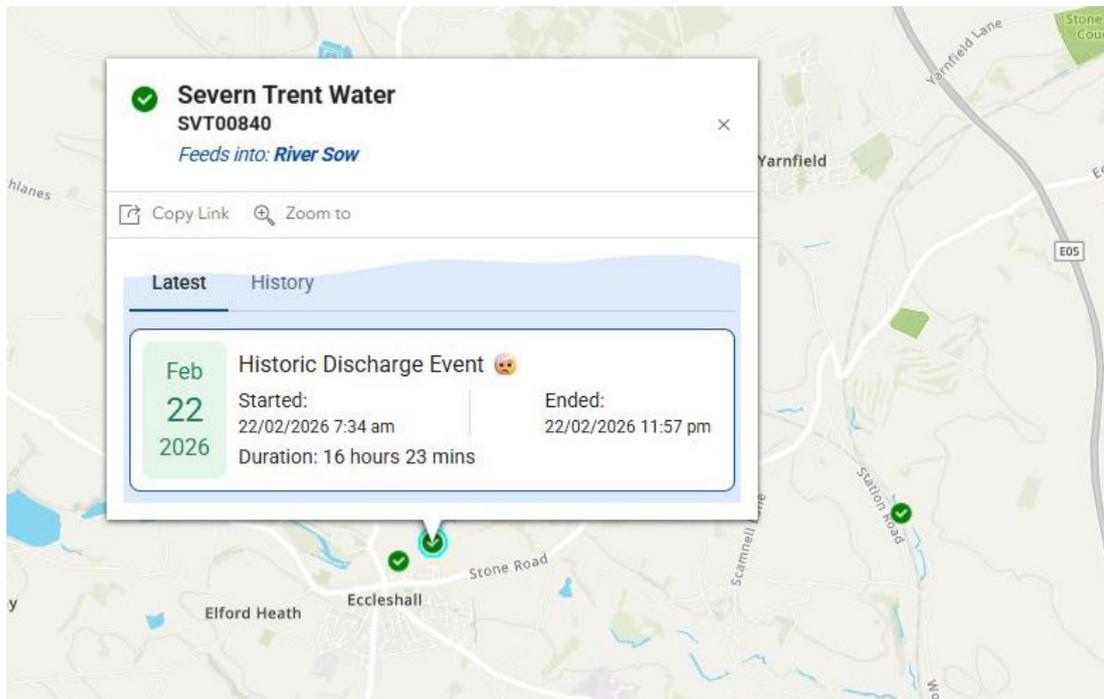
### Water Quality and Water Treatment Capacity:

EPC understand from recent published data that the current Severn Trent Eccleshall and Sturbridge Treatment Works released foul water discharge on 22<sup>nd</sup> February 2026 for 16hrs and 23minutes into the River Sow.

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

Figure 4: Water Treatment River Discharge Record



**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 extract on the following page is taken from the map shows the extent of the area (accessed February 2026).

The ‘Heritage Statement’, July 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.

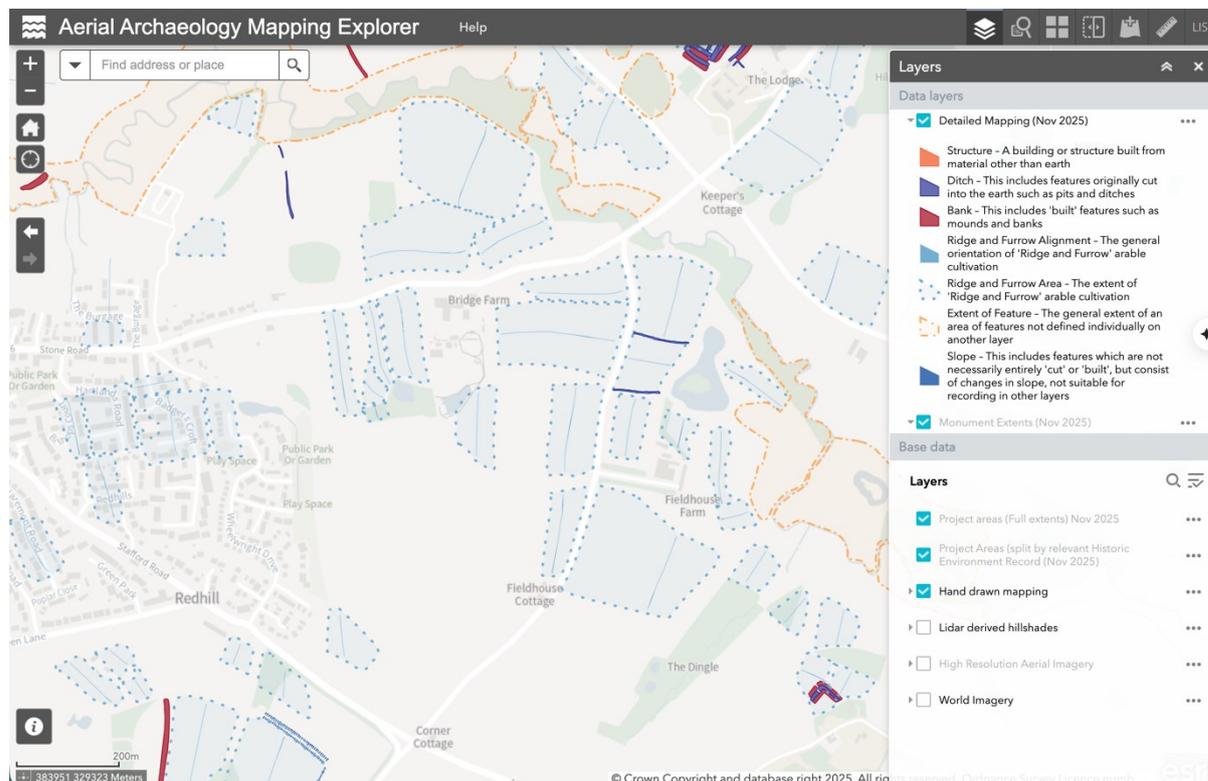
The application is contrary to the NPPF, Chapter 16 ‘Conserving and enhancing the historic environment’ makes clear in Paragraph 214 that:

*“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 5: 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.

They also note that the setting of heritage assets (in particular the Conservation Area) include the local context and the value and importance of the relationship with the surrounding surviving agricultural landscape. The Heritage Statement 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 and the loss of onsite heritage assets the scheme would clearly cause harm.

### Natural Environment and Biodiversity

EPC note the consultation response from the Newt Officer. Their comments make clear that the proposed development is within the red impact zone for great crested newts and that there is insufficient evidence submitted by the applicant to demonstrate that the proposals will not have an impact on the newts and/or their habitat should the development be approved.

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 lack of evidence to clearly understand the impact on the newts and/or their habitat further supports the case for refusal.

### Traffic, Cumulative Impacts and Sustainable Transport:

The Parish Council has significant concerns relating to the severe impact on highway 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. We are also concerned about capacity at the nearby roundabout junction which we understand is already at capacity during peak times and any cumulative impacts from this or other current applications in close proximity and across the Main Highway Network in Eccleshall. The

applicants modelling takes account of the application site only and not the potential true impact should other live applications be granted. Clearly this is not a matter to be dealt with in isolation, but a strategic planning matter.

Furthermore, the Institute of Highways and Transportation recommends that a bus stop should be located with 400m of development. The existing closest bus stop for the limited bus service is over 400m away and that it to the edge of the site, not even from within the proposed development. Together with the limited bus service and no other public transport provision in the locality, clearly the site is unsustainable and promotes private car journeys.

### **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 considerations 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.