

23/37587/OUT | Outline Planning Application for the erection of 36 dwellings (Use Class C3) including 32 Affordable Units, 4 Custom/ Self-Build Plots; Access, Layout and Landscaping with the Matters of Appearance and Scale Reserved | Land Off Old Croft Road Walton On The Hill Stafford Staffordshire

Comments of CPRE Staffordshire, the countryside charity.

Please note that our comments relate only to planning issues. We recognise that other organisations and individuals have raised valid concerns regarding issues such as highways, the lack of public transport, the loss of productive agricultural land, as well as negative impacts on the landscape, ecology and biodiversity. We hope that these matters will also be considered when making a decision on the application.

We **oppose** this development and reiterate the comments we made in opposition to the previous, very similar, application on this site (22/36536/OUT).

The application is on a greenfield site on the edge of the town of Stafford.

Planning Policy

In 2014 the Borough Council adopted the Stafford Borough Local Plan 2011 – 2031. The site is not allocated for development in the Statutory Development Plan and is outside the current settlement boundary as established by Policy SB1. The Plan is clearly up-to date and meets the tests of the National Planning Policy Framework (NPPF). To grant permission for this site would be clearly contrary to Stafford Borough Council's Adopted Policies. In our opinion, the site does not meet the criteria set out in Policy C5 for residential proposals outside the settlement hierarchy.

The Plan for Stafford Borough states that it "is based on the clear conclusion that development in this location [the south of Stafford] is both less practical and less sustainable than at other locations around Stafford town".

The location is also not allocated for housing in the 2022 Preferred Options consultation.

The Borough Council has allocated more than sufficient land for housing development in Stafford, and throughout the borough. The Borough Council's monitoring in 'Land for New Homes' shows that average completions have exceeded 600 dwellings per year against a target of 500p.a.

The Government's requirements in the National Planning Policy Framework (NPPF) to have more than a 5-year housing land supply is exceeded in Stafford Borough. There is therefore no need for development on greenfield

sites such as this and refusals in such instances have been dismissed on appeal.

We do not accept the applicants' agents' assessment that the application is in accordance with the Local Plan and NPPF on policy grounds.

Affordable Housing

The applicant asserts that the proposal is for 89% affordable housing and that the provision of affordable housing in Stafford Borough has been inadequate.

The definition of affordable housing is given in Annex 2 – Glossary in the current NPPF. We have noted that no Registered Housing Association is involved in the application and that the proposal is only for “affordable” homes rather than social housing.

Tetlow King make good arguments in support of additional affordable housing. They quote extensively from the Council's own strategies, business objectives and research. Whilst reference is made to Rural Exception Housing, there does not appear to be a rural needs survey accompanying the application.

We recognise that at Saddler Avenue in Stone the Council accepted at the planning appeal (Appeal Decision APP/Y3425/W/18/3202676) that ‘Rural Exception’ housing could be provided on a site on the edge of the town rather than in the rural area. However, this remains a controversial interpretation of the Council's Local Plan Policy.

Our underlying concern is that if consent is granted, establishing the principle of housing on the site, it may be difficult to ensure that the entire site is used for affordable housing if further applications are made.

We would urge Stafford Borough Council to be cautious in considering the claims made in the application. We urge you to carefully consider whether the need for affordable housing outweighs the planning presumption against the development of an unallocated greenfield site on the edge of Stafford close to Cannock Chase AONB, as well as matters raised by other representees.