



Seddon Homes

ASH FLATS, STAFFORD

Development Framework





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1 INTRODUCTION

This Development Framework sets out the planning potential and suitability of land at Ash Flats, Stafford, for new housing to contribute to the emerging Plan's housing requirement.

The site was promoted for new housing in 2014. Stafford Borough Council, and subsequently the Planning Inspector at appeal, confirmed that the site was suitable for housing and was satisfied that all technical matters could be addressed, specifically stating '*I have no specific evidence to suggest that 320 dwellings could demonstrably not be accommodated in an acceptable fashion within the balance of the site*'. At the time the borough could however demonstrate a sufficient supply of deliverable housing sites so planning permission was not granted.

Nevertheless, the planning history demonstrates that in principle, the site should be considered favourably for housing.

This document presents an analysis of the site, its context, and its technical suitability for development. It considers the relevant change in policy since the site was last considered for housing and demonstrates why now is the right time to allocate the site in the emerging local plan.

Seddon Homes request that Stafford Borough Council allocate the site for circa 320 houses in its next local plan.

1.1 SEDDON HOMES

The site is being promoted by Seddon Homes.

Seddon Homes is a large multi-regional housebuilder and is one of the most respected and trusted home builders based in the North West. Seddon Homes' new developments currently stretch from Lancashire to Staffordshire and Merseyside to Yorkshire and offers a diverse collection of styles.

Seddon Homes is well placed to offer a home to suit all tastes and budgets in order to match the needs and lifestyle of today's modern new home buyers.

2 SITE AND SURROUNDINGS

2.1 SITE

The site, shown edged in red below, is located approximately 3 kilometres to the south of Stafford Town Centre. It sits immediately adjacent to the current settlement boundary of Stafford Town, the largest settlement in Stafford Borough.

The site forms a logical extension to the existing built-up area of Stafford.

Figure 2-1 - Site Location within Stafford (site edged red)



Source: Google Earth.

It extends to 13.8 hectares (34.1 acres) and comprises open grassland, subdivided into smaller land parcels by hedgerows and a number of mature and semi-mature trees. An open watercourse, lined with trees, known as Pothooks Brook runs along the southern boundary of the site in addition to a Public Right of Way running through the centre of the site from east to west.

The site is gently undulating, with a general fall from the north to south.

The majority of the site lies within Flood Zone 1 (the lowest possible flood zone designation) however areas adjacent to Pothooks Brook along the site's southern boundary are located within Flood Zones 2 and 3.

The site does not sit within a conservation area and there are no listed buildings on or adjacent to the site.

A new access point into the site will be required. However, it was demonstrated through the previous application at the site that there is a workable and accepted access solution off Moss Pit Lane.

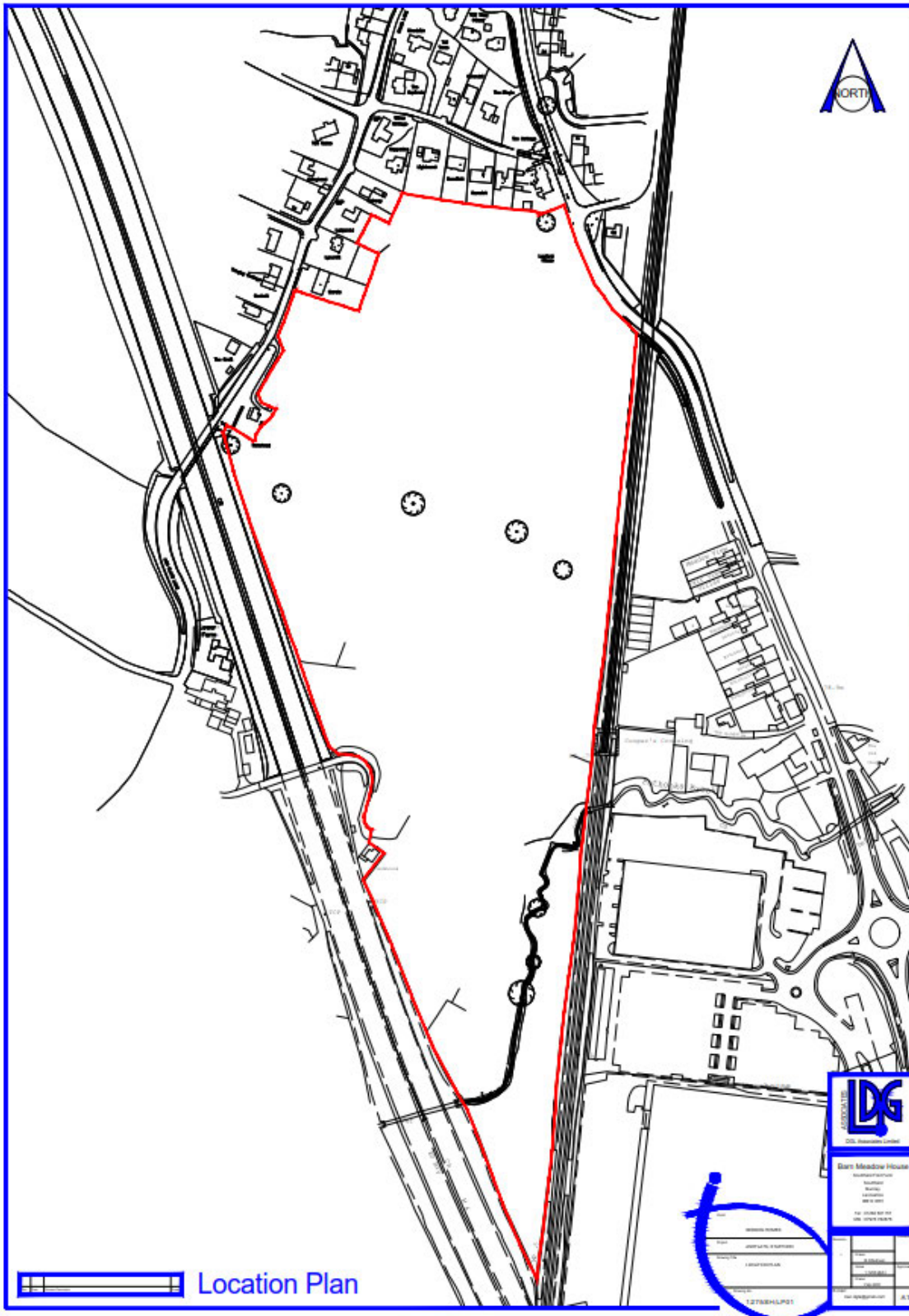


Figure 2-2 - Site Location Plan



SITE BOUNDARIES

To the north of the site lies residential dwellings on Barn Bank Lane and Ash Flats Lane, beyond which lies further residential development. To the east lies the West Coast Mainline railway line with Acton Gate Business Park beyond. The M6 motorway borders the western boundary of the site with the southern boundary of the site marked by the railway line running underneath the motorway.

2.2 SURROUNDINGS

The site is in an accessible location within close proximity to a range of services and amenities. Within a 2 kilometre radius of the site lie several convenience stores, primary schools and a secondary school both with 'good' Ofsted ratings all of which are within a short walk from the site.

Furthermore, the site is well connected to the existing bus routes with bus stops located on Moss Pit Lane, within 200 meters from the site providing access to Stafford, Stafford University and Wolverhampton. The bus service frequent with at least an hourly weekday service (8am–7pm). The site is also readily accessible to Stafford Town Centre and the strategic road network.

3 BACKGROUND TO THE SITE

Application 13/19524/OUT

In 2014 an outline application for up to 320 dwellings (all matters reserved except for means of access) was refused.

The sole reason for refusal was on the basis that the proposed development was on greenfield land outside the residential development boundary of Stafford and given there was a sufficient supply of housing at that point in time was contrary to the development plan.

The Council considered that the proposal was therefore premature and could prejudice development that it hoped would come forward in Strategic Development Locations, as identified in the soon to be adopted new Plan for Stafford Borough. At the time the application was determined, the emerging Plan had been through examination and the Inspector had issued Recommendations for Future Main Modifications, therefore, emerging policies were afforded weight in the determination of the application.

Appeal APP/Y3425/A/14/2217578

An appeal was lodged and subsequently dismissed in December 2014.

In dismissing the appeal, the Inspector concluded that as the proposal involved, what at that time the Inspector deemed unnecessary development of greenfield land, the proposed development would conflict with and harmfully undermine the intentions of the development plan. Furthermore, as the Council could at that time demonstrate a five year supply of deliverable housing sites paragraph 49 of the National Planning Policy Framework was not engaged. It was on this basis only that the appeal was dismissed.

In terms of quantum of development, the Inspector noted that no evidence had been presented to demonstrate that the site could not accommodate 320 dwellings but was satisfied that the reserved matters process provides adequate provision to assess this and ensure acceptable design standards were met.

With regards to other matters, the Inspector concluded that whilst a range of objections had been raised by third parties, it was clear from the Council Officer's Report and the Planning Statement of Common Ground *"there are no 'technical' objections from relevant consultees. Moreover, there are no concerns or qualifications from such sources that could not be addressed by scheme design at reserved matters stage and/or the imposition of planning conditions, together with the execution of an appropriate form of planning obligation"*.

The proposed access arrangements were considered in greater detail due to concerns raised by residents. As both the Highways Authority (Staffordshire County Council) and the Council were satisfied with the proposed access the Inspector concluded that they were unable to justify a sustainable highways reason for refusal as there was a lack of evidence presented to demonstrate anything otherwise.

The Inspector also recognised the benefits, both socially and economically from the proposed development, notably its contribution to growth, the potential for affordable housing provision, and in simple terms its potential to boost the supply of housing generally.

How Have Things Changed?

Since the determination of the appeal, the Council has adopted its Part Two Local Plan and is now on with preparing the New Stafford Borough Local Plan 2020–2040.

The settlement boundary for Stafford Town runs along the northern boundary of the site. In determining whether this site should be included within the settlement boundary, the Local Plan Inspector concluded:

“it is sustainably located, subject to appropriate mitigation from the significant noise impacts of both the two highways (especially the M6) and the railway. It is my view, however, that the strategic housing requirements of PSB1 can be provided satisfactorily without recourse to developing new homes on this site. I therefore consider that the site is not needed now, and for this reason the settlement boundary does not need to be changed”.¹

Work is underway to determine what levels of new housing will be needed for the Borough over the new plan period, and where it should be located. The latest figures published by the Council in the Issues and Options Consultation Document (February 2020) show substantial levels of committed development at the three Strategic Development Locations (SDLs) around Stafford Town.

Whilst we are aware that Stafford is still exploring development and growth strategies as part of its emerging Local Plan, it is worth highlighting the importance of sites, such as Ash Flats, and the role they can play in helping to deliver the Borough’s housing needs over the plan period. Relying on a small number of very large urban extensions or new Garden Communities / Villages is likely to mean that housing delivery is back-ended and doesn’t start to come forward until towards the end of the plan period. These sites often require significant infrastructure and investment, meaning delivery rates are slow and can lag behind keeping pace with meeting housing needs. The Council’s Issues and Options Paper (April 2020) openly acknowledged that should any new Garden Community / Village be identified through the emerging Local Plan, that it would not be able to deliver any new housing until very late in the plan period (approx. 2030) due to lead in times and the significant level of infrastructure required to support it. An over-reliance on such sites is contrary to the Government’s objective to significantly boost the supply of housing and also the provisions of the NPPF which notes the important of having a rolling five year supply of housing land available.

Therefore, in order for Stafford to continue to meet its housing needs over the next plan period, additional, sustainable sites, such as land at Ash Flats, will need to be allocated and brought forward for development.

The Borough already has experience of large urban extensions taking time to come forward, with the slow take off of the northern and western Strategic Development Locations (SDLs). The latest reported position is that only 8% of the Northern SDL has been delivered and only 10% of the Western SDL, since the Plan for Stafford Borough was adopted in 2014. Whereas, the smaller SDL at Stafford East progressed well and is now close to delivering its full quantum of development.

¹ <https://www.staffordbc.gov.uk/sites/default/files/cme/DocMan1/Programme%20Officer/Programme%20Officer%202014/O1.26---Stafford-LP-Inspector-Final-Report.pdf>



Therefore, in order for the Council to ensure it has a rolling five year land supply throughout the plan period, it needs to identify a number of smaller, sustainable sites which are not heavily reliant on significant investment or new infrastructure, such as Ash Flats, which can start delivering housing in the shorter term. Failure to identify sites capable of meeting the short/medium term housing needs of the Borough would be an unsound approach and be contrary to the NPPF.

4 POLICY CONTEXT

Policy Position

Adopted

Development in Stafford is currently managed by Stafford Borough Council's Local Plan. The Local Plan comprises The Plan for Stafford Borough (Part 1) (adopted June 2014) and The Plan for Stafford Borough (Part 2) (adopted January 2017).

The site is located immediately adjacent to the south of the settlement boundary of Stafford Town as outlined on Stafford Borough Council's adopted policies map.

Part 1 of the plan largely addresses the housing needs of Stafford Borough through the delivery of three SDLs, located to the north, east and west of Stafford Town. Part 2 of the plan sets out the approach to development in the sustainable settlement hierarchy.

The adopted housing target set out in the Part 1 of the plan is 10,100 new homes, which equates to 500 dwellings per annum (dpa) over the period 2011 – 2031. For Stafford Town, of the 10,100 new dwellings required, Policy Stafford 1 seeks to direct 7,000 of these to Stafford Town. The majority of these (5,900 dwellings) are anticipated to be met through the delivery of housing at the three SDLs.

Emerging

The new Stafford Borough Local Plan will replace The Plan for Stafford Borough Part 1 and Part 2. It will guide the scale, location and nature of new development in the Borough area over the Plan period 2020-2040. In doing so, assuming adoption of the Plan in 2022, it will provide a plan horizon of at least 15 years.

Consultation on the Issues and Options document took place from February to April 2020 which considered a full range of issues facing Stafford Borough, including the levels of housing required over the next 20 years and how the provision might be distributed across the Borough.

The Issues and Options document sets out six options in terms of future development strategy and the promotion of the site for development aligns with the objectives of all Growth options outlined, except for option 4 which focuses on new Garden Communities only.

In terms of housing numbers, the Issues and Options document presents a number of possible future housing scenarios which will inform the determination of the housing requirement ranging from 480 dwellings per annum up to 746 dwellings per annum. Furthermore, it should also be noted that the minimum requirement calculated based on the Standard Method is 400 dwellings per annum.

5 CONSIDERING THE POTENTIAL

The original technical assessments submitted in support of the 2014 application provide significant level of detail and demonstrate that there are no technical constraints preventing residential development from coming forward on this site. Whilst any future application would be supported by new assessments to reflect the latest position this section summarises the technical reports undertaken to demonstrate the development potential for the site in addition to solutions which have been identified to overcome constraints.

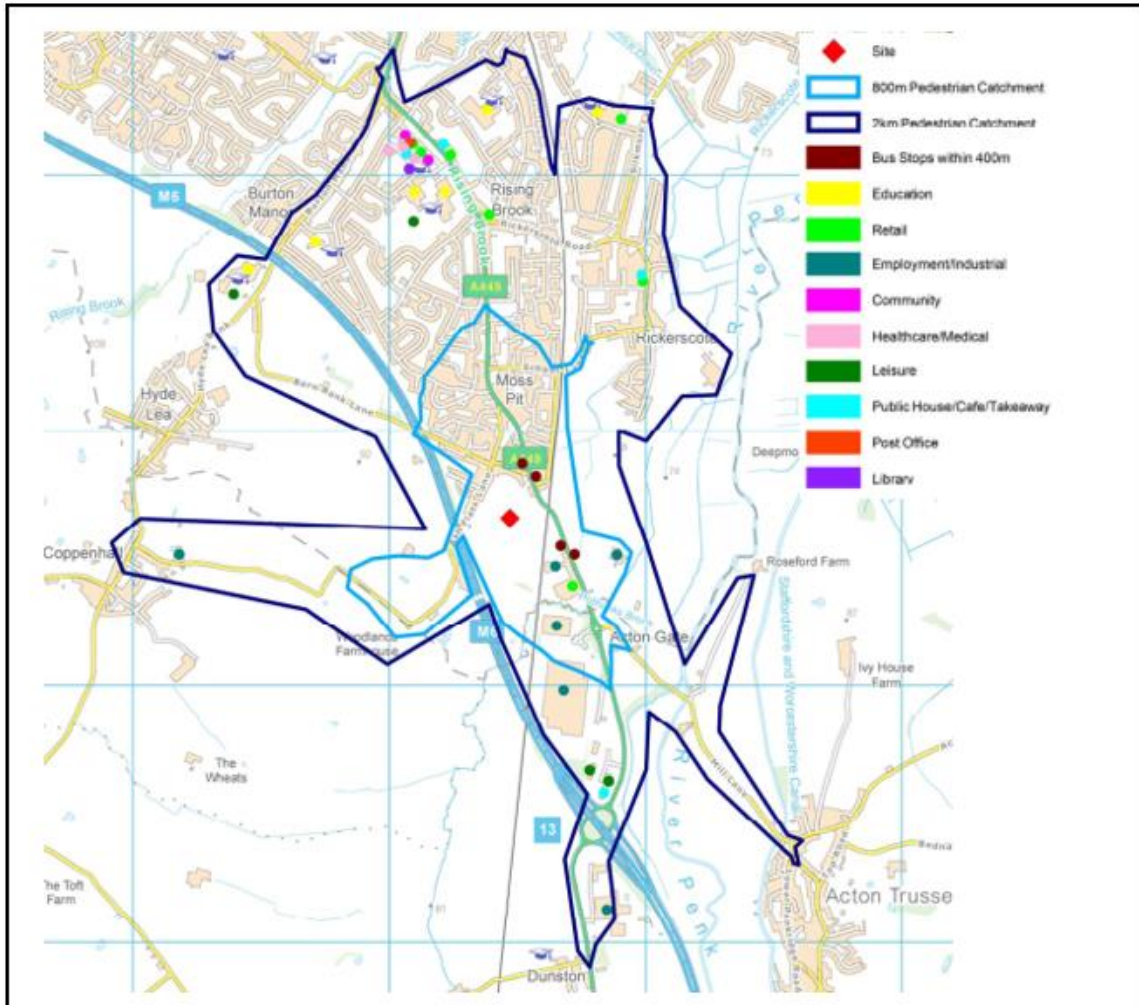
Highways and Accessibility

The highway impacts of the site and the site's accessibility have been assessed by Croft Transport Solutions. The evidence and modelling prepared by Croft Transport was assessed by both the Local Highways Authority and the Highways Agency during the 2014 application and they confirmed they had no objections on highway grounds and were both satisfied with the proposed access arrangements. Furthermore, during the appeal the Inspector concluded that they were unable to conclude that there is a sustainable highways reason for refusal.

Crofts Transport Solutions undertook an assessment of trip generation to gain an understanding of the likely impacts of development on the wider highway network. It established that the local highway network had capacity to accommodate development on the site and thus there would be a negligible impact on the local highway network.

The site benefits from being highly accessible by non-car modes of transport with the existing pedestrian footways providing access to a range of services located within the vicinity of the site. For longer journeys, the site is well served by the existing bus network, providing connections to Stafford Town Centre and the railway interchange. Bus stops are located on Moss Pit, within 200 meters of the site. The location of nearby services facilities is shown on the plan below.

Figure 5-1 - Plan Identifying Location of nearby Facilities



Source: Croft Transport Assessment 2013.

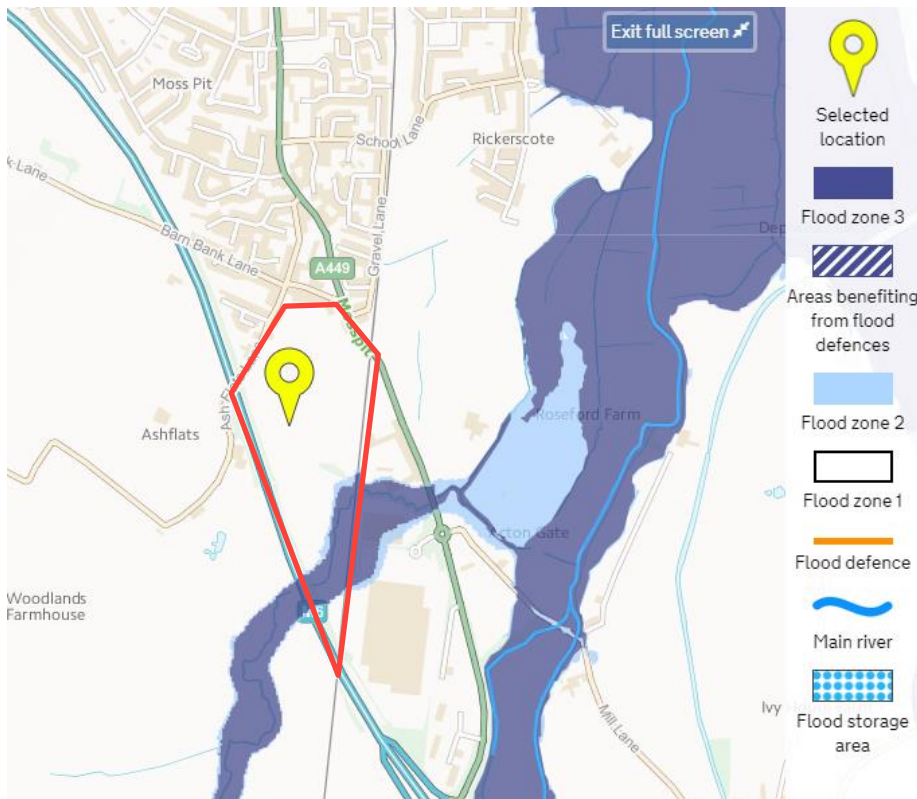
The work undertaken by Croft Transport Solutions demonstrates that development on the site can be accessed by safe and efficient vehicle access junction arrangements from Moss Pit Lane. Additional land which lies to the north east of the site has recently been purchased to facilitate a suitable access for up to 350 residential units.

Flood Risk and Drainage

The majority of the site is located within Flood Zone 1 where the risk of flooding is considered to be low. The southern part of the site lies within Flood Zones 2 and 3. This area will remain free from development and provides the opportunity for incorporating a sustainable drainage system (SuDS) into the site. It will also visually and spatially separate the dwellings from the employment estate to the south east of the site.

Travis Baker Ltd carried out a Flood Risk and Drainage Assessment in 2013. This review concluded that the site is capable of being drained satisfactorily. The drainage system would be designed to limit surface water flows to the greenfield run-off rate plus an allowance for climate change, so as not to increase the risk of flooding either on the allocation or elsewhere.

Figure 5-2 - Extract from the Environment Agency’s Flood Map (site edged red)



Due to the nature of the site additional SuDS features such as swales, rainwater harvesting and permeable paving could be incorporated into the scheme at the detailed design stage.

The Environment Agency raised no objection to the proposals submitted in 2014 and Seven Trent Water confirmed appropriate sewerage infrastructure within the vicinity of the site to which connection can be made.

Ecology

Extended Phase 1 Habitat Surveys of the site were carried out by Wardell Armstrong in July 2012. The site comprises an area of grazed pasture and arable farmland with associated species-poor hedgerows and trees.

The development will be designed to focus on areas of negligible ecological value, seeking to avoid the areas of highest ecological value, namely the mature trees, woodland and Pothooks Brook corridor. Where some tree losses are required as a result of the development, or for arboricultural reasons, they will be compensated through new native tree planting.

Whilst evidence of badgers and bats on the site were found the absence of good quality or species-rich hedgerows and grassland was felt to limit the opportunities for a variety of birds, which were not found to be present. Furthermore, no evidence of invertebrates, water voles or otters were found.

The evidence of bat activity was low, and no roosts were found, nevertheless those present would benefit from the proposed ecological landscaping.



The Council was satisfied with the findings in 2014 and subject to conditions raised no concern in relation to ecology.

Noise

Noise and vibration consultants, noise.co.uk carried out an Environmental Noise Survey in April 2013. The assessment confirmed the main noise sources as the M6 motorway, the West Coast Mainline, A449 and the industrial estate to the south east.

The report confirmed that with appropriate glazing and physical noise barriers along the M6, West Coast Mainline and A449 boundaries, internal noise level criteria could be met across the site. The Environmental Health Officer considers housing can be accommodated on the site with the necessary mitigation in place.

Air Quality

An Air Quality Assessment was undertaken by REC in October 2013 to consider the impact of pollutants from the M6 and the West Coast Mainline. The assessment also considered the potential air quality impacts created as a result of vehicle trips generated by future residents from the proposed development.

Dispersion modelling was undertaken in order to quantify pollutant concentrations at the site and predict air quality impacts as a result of road vehicle exhaust emissions associated with traffic generated by the development. Results were subsequently verified using monitoring results obtained from Stafford Borough Council.

The results of the dispersion modelling assessment indicated that predicted pollutant concentrations were below the relevant poor air quality threshold at the proposed site. As such, the location was considered suitable for residential usage with regards to air quality.

Potential impacts during the operational phase of the proposed development may occur due to road traffic exhaust emissions associated with vehicles travelling to and from the site. An assessment was therefore undertaken to quantify pollutant concentrations both with and without the proposals. This indicated impacts on pollutant concentrations were not predicted to be significant at any sensitive location in the vicinity of the site.

In 2014 the Environmental Health Officer accepted the findings of the Air Quality Assessment and was satisfied the proposal would not worsen the existing air quality.

Ground Conditions

The Ground Investigations Report identifies that no evidence of significant contamination has been found across the site. Furthermore, the report outlines no remediation is considered necessary at the site and subject to relevant test results it is recommended that site-won topsoil should be placed in all gardens to provide a clean growing medium.

The officer's report associated with the 2014 application was satisfied with the findings.

Utilities

The Utilities Report produced by UCML confirms there is sufficient infrastructure provision within close proximity to the site. Western Power Distribution has existing low and high voltage infrastructure within the vicinity of the site. National Grid Gas has existing low and medium pressure mains within the vicinity of the site. Severn Trent Water has existing infrastructure within the vicinity



of the site. Finally, there are BT underground and overhead apparatus present close to the site to enable new telecoms connections to the development site.

Landscape and Visual Impact

An Outline Landscape and Visual Impact Assessments of the site was carried out by Tyler Grange in October 2013. It concluded that development on the site would result in a subtle extension to the settlement at the southern edge of Stafford within a land parcel already well contained by established urban land uses, and this would not result in the loss of rare or unique features within the locality. Given the relative segregation of the site from the wider rural landscape the perception or distinctiveness of the wider Landscape Character Types would not be compromised.

The officer's report associated with the application in 2014 outlines that the existence of the motorway and railway already provides some audible and visual detraction from the quality of the surrounding landscape and the Council recognised that they also serve to visually segregate and isolate the site from the wider landscape. The Council acknowledge no notable, rare or unique features would be removed from the site and that the meandering water course (Pothooks Brook) would be retained.

Heritage and Archaeology

The site is not located within a conservation area and there are no listed buildings on or within close proximity to the site.

In terms of archaeology, it has been acknowledged previously that there is a chance of prehistoric or Roman deposits surviving on the site due to historic mapping showing that the site has been used as fields since medieval times, with possibility of some clay extraction for brick-making. The Council was satisfied in 2014 that this could be addressed through a watching brief condition.

6 A DEVELOPMENT FRAMEWORK

The various technical reports have identified a series of site and development opportunities and constraints. These have been summarised in an Opportunities and Constraints plan (provided below) which, in turn, has informed the evolution of the site's development. An illustrative masterplan (also provided below) outlines key development themes across the site.

The development of the site will be designed in accordance with the principles in the National Design Guide. The scheme will have its own identity drawn from the character of the surrounding residential properties. It will be planned to enhance the existing landscape and undulating topography and will have a distinct and complementary relationship with the land beyond its boundaries.

There will be an easily accessible, walkable and permeable network of streets, paths and cycle ways, which gives priority to pedestrians and cyclists whilst providing adequate space for parking. This network will be fully integrated with a diverse pattern of formal and informal green spaces, waterbodies and other public spaces, that will serve their surrounding areas and support a varied ecology, whilst encouraging healthy lifestyles. It will also be designed in a manner to encourage movement of people across the site from the existing housing to the north.

There will be a range of house types, with varying densities and tenures, gathered into mixed, identifiable and affordable neighbourhoods.

The design of the landscape, streets, paths and buildings will be considered as a whole, and will draw their character from the typical landscape and residential properties surrounding the site.

Figure 6-1 - Constraints and Opportunities Plan



Figure 6-2 – Illustrative Masterplan



Access and Movement

The main vehicular access point will be within the north east corner of the site, off Moss Pitt. This will lead onto the main primary movement routes throughout the site, leading east to west and north to south. It is intended that, as far as possible, the primary movement routes loop round the whole site providing circulation routes.

Individual development parcels will be served by secondary movement routes in addition to shared and private drives branching from the main primary movement routes.

Complementing this vehicular movement network will be extensive pedestrian and cycle routes.

Main routes will be provided in landscaped corridors and within the landscape bunds running alongside the motorway and railway. The routes will also run through the public open space and across and adjacent to Pothooks Brook.

Each of the main pedestrian and cycle routes will be connected by a network of other routes providing access to and across the whole site. This includes providing connections through to the existing residential areas on Ash Flats Lane, ensuring that the proposed development of the site integrates with the existing settlement. The pedestrian connections into and out of the site also provide access to local services including schools and convenience stores. There is also the opportunity provide pedestrian access from within the site across the motorway bridge (to the west of the site) connecting to the fields open countryside beyond.

Layout and Design Principles

Residential Development

The illustrative masterplan identifies pockets of development parcels situated within a network of open space and green infrastructure.

Approximately 320 residential dwellings could be accommodated on the site and the scale of the site means a variety of types and sizes of home would be provided. Where possible, dwellings would be positioned to front onto areas of public open space.

The range of accommodation and the road hierarchy also provide an opportunity to introduce distinctive character into the scheme at detailed design stage, helping to create a new neighbourhood with a clear sense of place.

There will be a consistency of style between the development with house designs reflecting the character of the local area.

The illustrative masterplan shows a net developable area of approximately 10.28 hectares. If 320 dwellings were provided on the site this would yield approximately 31 dwellings per hectare.

Public Open Space and Green Space Network

A large amount of public open space and green infrastructure is shown on the illustrative masterplan. The proposed masterplan retains a number of the existing trees and hedgerow borders within the site in addition to maximising the opportunity adjacent to Pothooks Brook.

The southern end of the site, which lies within Flood Zones 2 and 3 will comprise of a large area of public open space with additional tree planting to supplement the existing tree coverage, especially along Pothooks Brook. The natural environment adjacent to Pothooks Brook will be enhanced through the green infrastructure provided.



Proposed Landscape Bunds are proposed along the site's western, eastern and southern boundaries, adjacent to the railway line and motorway. As well as providing a noise barrier they will also provide a network of green space within the site for residents to enjoy. The Landscape Bunds will include new tree planting to provide additional screening.

The areas of open space would be connected by pedestrian and cycle routes which would themselves be set in green corridors. The distribution of open space – and the green corridors between them – are designed to encourage movement through the site by following the likely desire lines of future and existing residents. This includes delivering routes across the site from access from the north, in addition to a new crossing across Pothooks Brook in the southern section of the site.

As well as encouraging movement around the site, this network of open space would be designed to deliver ecological benefits and provide semi-natural open space.

7 SCHEME BENEFITS

There are no technical constraints preventing the short term delivery of housing at this site. It is sustainably located and provides a logical extension to the already built up settlement of Stafford Town.

In addition, there are a range of scheme and socio-economic benefits that will be generated through the delivery of housing at this site:

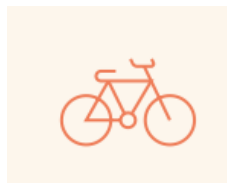
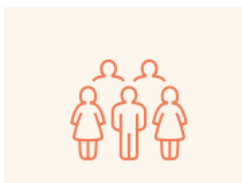
Economic benefits

- Approximately 240 construction workers will be employed on Full Time Equivalent permanent construction jobs;
- Approximately £150 million in New Homes Bonus payments to Staffordshire Borough Council over 4-year period;
- Around £5.3 million net additional expenditure in the local area by households each year; and
- Approximately £572,643 in Additional Council Tax Revenues per year.



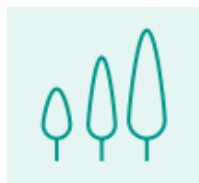
Social Benefits

- 320 Market and Affordable Homes;
- Provision of an attractive linear park and useable areas of Public Open Space (POS);
- Creation of a well-balanced place to live with strong linkages to existing communities and services / facilities; and
- Contributions towards addressing lack of provision of local community facilities.



Environmental Benefits

- Provision of strong landscape buffers along the site boundaries; and
- Opportunities for ecological enhancements along the landscape buffers and within POS areas.



8 CONCLUSION

The land at Ash Flats represents a suitable and deliverable site for new housing to contribute towards Stafford Borough Council's housing supply.

The site lies immediately adjacent to the settlement boundary, on the edge of the existing built up area, is well contained, and is in a highly accessible location close to existing shops and services.

This statement demonstrates the deliverability of the site. It is supported by a number of technical reports which shows how the site can be readily developed for in the region of 320 dwellings without any constraints.

Whilst an appeal was dismissed at the site in 2014, it was dismissed on the grounds that the proposal, at that time, involved unnecessary development of greenfield land as the Council could demonstrate a five year supply of deliverable housing sites. With regards to other matters, the Inspector concluded that there were no technical objections from consultees or concerns that could not be addressed by the scheme design at reserved matters stage.

The framework masterplan has been developed following a review of the site's constraints and opportunities. It demonstrates the site is able to accommodate at least 320 new homes comprising a mix of housing to meet family housing needs and provides for a substantial amount of open space. Key features such as hedgerows and trees would be retained wherever possible.

The site currently lies within the open countryside, for the reasons set out within this statement, it is a sustainable location for the development of at least 320 homes. It would provide an attractive living environment, integrate well with the existing settlement form and contribute to meeting the identified development needs of the area. Overall, there is a very strong planning case to justify its development for housing.



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