

66 Grosvenor St Leek Staffordshire ST13 5LY July 16, 2015

Rachael Simpkin Senior Planning Officer Staffordshire Moorlands District Council Moorlands House Leek ST13 5HQ

Dear Ms Simpkin,

## SMD/2015/0407 - Land At Milltown Way, Leek, Staffordshire

Outline application for up to 90 dwellings, with associated public open space, Ecological Management Area and landscaping, with all matters reserved except for access (resubmission of SMD/2014/0618)

I am writing to reiterate my objection to the granting of the development outlines in the above re-submitted application, on the grounds described below.

First of all, though, I would like to express regret that it's been possible for Gladman to make this re-submission without any form of supplementary public consultation, and to do so at a time of year when they are perfectly aware that many residents will be on their annual holidays, so that they perhaps are not aware that their prior (2014) expressions of objection will not be automatically considered in reference to the re-submission.

Why, I wonder, was Gladman not (as indicated on the Planning portal) required to pay fees for this 2015 submission, as is usual for an *actual* standalone application, unencumbered by prior comment from the public?

## 1. Access to the planned development

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The only matter in this application for consideration on a non-outline basis is that of access to the planned development. It is proposed to extend Milltown Way into the site land to provide vehicular access to a residential development.

Section 6.2.17 of the Planning Statement states that "Milltown Way is a single carriageway road and circa 5.5m wide". What it fails to mention is that much of this width is usually taken up by parked vehicles which cannot be accommodated in the driveways and garages of the existing residences on Milltown Way. A major increase in the volume of traffic, from the traffic generated by no more than 10 homes, to that generated by at least a further 90, will render the existing stretch of Milltown Way unfit for the purpose envisaged by this application.

Various sections of the Statement, including 7.3.1, assert that the relative proximity of the site to the centre of Leek will reduce reliance on car traffic.

Vehicle ownership in the existing homes on Pickwood Avenue, Milltown Way and adjoining residential roads is high (most households own at least two vehicles), due to the dispersed workplace and school locations of relevance to residents, and the structure and timetables of the local public transport services.

Any new development's occupants could be expected to follow the same pattern, whether by inclination or necessity, making a nonsense of the applicant's assertions. Not even shopping-trips within the town boundaries can, given the social mores of the times we live in, can be expected to be conducted, in all weathers, on foot or bicycle from this site.

The question of workplace locations makes the relevance of local authority boundaries to housing development a more qualified matter than is acknowledged by any of the Statement's many invocations of the National Planning Policy Framework. Leek residents commonly work in areas such as Stoke-on-Trent (where, it's surely not irrelevant to mention, the City Council estimates that over 170 hectares of brownfield land await development), or in Ashbourne or Uttoxeter, which makes residents' private car usage likely to be more prevalent than this application reflects.

Section 6.2.18 of the Planning Statement explains that "comprehensive modelling of the anticipated traffic impacts arising from the development demonstrate that there is no material detrimental impact on the operation of local junctions and that all will operate with significant spare capacity and limited queuing."

The reality as currently experienced by residents of Milltown Way and the adjoining roads is one of substantial queueing at peak times of the morning, which could only be worsened by a doubling of the number of houses being served by the single junction with the A523 at the end of Pickwood Avenue. I'm at a loss as to enhancements to the somewhat distant junction of Springfield Road and (the opposite side of) the A523 will materially alter this, although I'm aware of the Highways Authority's recommendations in this regard, from 2014.

Such is the sensitive location of this site (in part because of various past disposals of packages of land which also comprised the original estate, along with the area which is the subject of this application) that any alternative forms of access would result in considerable ecological damage, perhaps by crossing Ladydale or Ballington Wood from Cheddleton Road, or by using a right of way from Wood St. which the landowners involved in this application own.

Given that the actual scale of the development (90 houses) is stated purely on an outline basis in this application, it's hard to see how the applicant's projections regarding traffic volume have any validity.

While vehicular and pedestrian access to the site is of course of great importance, the Statement

consciously avoids addressing the landscape impact of providing access for sewerage and other utilities to the site (an exclusion appears in draft Appendix 1, section 14, "Foul Drainage"). These requirements will also have an impact on the area.

## 2. Ecological impact of granting access

In section 6.2.8, the Planning Statement reads, "The area proposed for development is, contrary to the findings of the 2010 report, of low conservation value. This was confirmed during a pre-application site visit with officers in August 2014."

If, indeed, the Council's officers did express this view in the course of a site visit, does this constitute an official rescinding of the SBI status of the site? Is there written evidence of this 'decision' in the Council's record of this visit?

With reference to other sections of the Statement, it must be pointed out that merely retaining a pedestrian right of way (the 'open space', which is held to be ecologically superior to the current very light agricultural usage of the land - a moot point) through the northern and western perimeters of the site does not constitute protection of the habitats which the site contains. Furthermore, the presence of the existing Milltown Way houses can hardly be said to constitute a reason why the SBI should shrink further in size.

In section 6.2.13, reference is made to retention of features of relevance to the bat population. Given the light pollution which is an inevitable outcome of modern housing development on this scale, this is impossible to credit.

6.2.41 refers to "Retained buffer planting to the western and north-western boundaries, protecting views from Westfields, Moorfields, Wood Street and Grosvenor Street and providing a robust green edge". It's not clear how this can be done while also creating a safe public walkway through quite a confined space, which would surely mean removing a substantial amount of the existing shrubbery.

## 3. Various matters

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Section 3.4.2 of the Planning Statement: "It is likely that...on average around 25 to 30 market dwellings would be completed per annum...it is anticipated that the development of the site would take in the order of 4-5 years to complete".

This projection bases its claim of authority on the rather shaky assumption that this applicant and these landowners will still remain involved in this scheme after outline planning permission has been secured, something which no law, convention - or, perhaps, economic consideration - compels them to do. Framing the application's concrete matters for consideration in this way is therefore bogus.

In any event, the suggestion that the surrounding area needs to be disrupted, in many aspects, for up to half a decade, in order to erect run-of-the-mill housing stock which can better be provided elsewhere, such as on derelict land in Leekbrook (as per application SMD/2014/0544), or in Cornhill and Barnfields as per the Churnet Valley Masterplan, is not acceptable to residents of the area.

The pedestrian approaches to Pickwood Recreation Ground from the north provide a green finger stretching from near the Conservation Area, into a large green space, which is used by Leek residents of all ages, including those whose mobility may be too limited to allow them access to the more open countryside of the surrounding Moorlands. Given the vantage point which the Rec offers from which to view much of that surrounding landscape, on several sides, it fulfils a unique role within the town.

To curtail this view, and to cause the Rec to be entered from all sides through concrete corridors, with a possible view to eliminating it later (as per the discarded 'Area 4' provisions of the draft Local Development Framework of 2008, or a past Ogilvie application SMD/1981/0158), can only have a detrimental effect on the quality of life in the town.

It is my strong opinion that the case put by this applicant does not justify such an effect now, any more than it did in 2014.

Yours sincerely,

Cathal Coughlan (Mr.)