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Dear Ms Simpkin,

Letter of objection - SMD/2016/0430 – Land off Uttoxeter Rd, Lower Tean

I write to object to the above planning application on the following grounds:

1. SMDC policy documents presently in force clearly state that the site should not be built on.

See Appendix 1. Map and SMDC statement

- The current SMDC site allocation plan says that plot LT001 is outside the Development Area and should not be built on.
- The site is in a “Special Landscape Area” and that designation is still in force
- SMDC documents state very clearly that the *existing development map applies* until the present review is complete.
- It is very clear that the existing map applies and that the proposal is outside the permitted boundary.

The site is inappropriate and the development is unsustainable in this respect.

Conclusion:

The application tries to draw attention away from the fact that this Council's policy is that the site is outside of the Development Area. I encourage the Council to continue to enforce its own well-founded guidelines and to reject the proposal on the grounds that the development is outside the Development Area.

2. Provisions for ground water management.

a) There are serious local issues with ground water on and near the site.

- i) Local houses with basements suffer flooding and have had to install submerged pumps. Basement flooding happens in the Dog and Partridge on the downhill side of the LT001, and in houses in Mill Lane
- ii) There is very often a large amount of standing water on the A522 between Heybridge Cottage and the bus stop. It has been like that for the 50 years – I have seen this always. This is downstream of the development site, and is run-off water from the site.
- iii) In recent years, Heath House Lane has been a run-off water course during storm conditions. A considerable torrent runs down the lane.

These issues are overlooked by the applicant's report.

Conclusion:

There are local issues with surface water that are not acknowledged in the consultant's report.

b) Limitations of the Drainage Report from KRS Environmental, Powys, South Wales.

Comments on individual statements are given in Appendix 2.

The report openly states that no geotechnical information was measured on site (2.8 and 2.13).

They have relied on boreholes off-site and large scale geological maps – neither of which are adequate – so the consultants themselves recommends further survey work.

Moreover, since the consultant is based in Montgomery, South Wales, they are unlikely to have local knowledge.

•The consultant has gathered insufficient information to give a conclusive recommendation about surface water drainage.

However, there is a clear statement that surface water cannot be discharged into the local river for practical reasons.

There are two remaining options:

a) use of soakaways: There is impermeable rock at a very shallow level under the site (the occupant of Heybridge Cottage knows this from trying to erect fence posts!). Soakaways will be an impractical way to disperse ground water.

b) there is an elaborate description of water butts and storage tanks to deal with flood water. Evidently the consultant is not convinced that soakaways will be the answer, and has proposed unusual measures.

An assembly of tanks and water butts for each property does not seem a practical way to deal with a known ground water problem locally.

One option is for a 414 m³ holding volume: however there is no provision made in the plans for a 20 x 20 m square pool on site!

Conclusion:

The consultants states that they have not gathered full information about the local site. Local water problems (flooding from surface water) are not acknowledged and there have been no physical (geotechnical) surveys.

The Consultant's favoured ground water solution of soakaways does not take into account the local conditions of impermeable ground. The alternative of holding tanks and water butts seems desperate and in any case is not catered for in the plans.

Insufficient provision has been made for the sustainability of the site with regard to drainage.

3. Scale of the development.

The applicant states that the development is for 7 houses. However there is evidence to believe that this would be just the start of his intended development here:

a) The applicant's own paperwork states that he is going for 20 houses.

The applicant's own report on drainage (KRS Environmental, Powys, Wales - March 2016) states in

"Section 4.2 Site Areas It is understood that the proposals are for up to twenty dwellings."

This is plainly at variance with what the applicant has stated in the proposal. Since the report is recent, and postdates the earlier application, it cannot be a mistake.

b) The access road is clearly intended for more than 7 houses.

The road is unnecessarily large and is well positioned to serve future expansion of the development beyond the stated seven houses.

Conclusion:

The application could be read as being deliberately mendacious – it looks like the original intention to develop a large number of houses on this site has been retained by the applicant.

4. Form and design of the proposed houses or dwellings.

The applicant has again declined to give plans as to what the development would look like. There are clear issues of context for any plans here. But the failure to include plans only fuels speculation that the development is intended to be bigger than seven houses.

Conclusion:

- a) The applicant would rather not disclose his intentions with regard to the form and mass of the houses. Without these being defined, there is significant risk that an inappropriate development will result.
- b) This is a red herring: Whatever the form of the development, it does not detract from the fact that the proposal is for development outside the Council's own Development Area.

I urge rejection on the grounds that the proposal consciously declines to reveal its final intention - which is likely to be inappropriate in form, and certain to be inappropriate in terms of the Development Area.

NB. It would be wrong for the Council to instruct the applicant to come back with detailed plans that will then be considered. Historic England do not consider the other factors. This proposal fails on more serious grounds (See 1 above).

5. Local schools.

Lower Tean is in the catchment area for Checkley Hutchinson Memorial Primary School. It is full. No further pupils are being accepted for the present year. There are no plans for its expansion.

Conclusion:

There is no consideration in the proposal for the impact on local services, including schools. The proposal should be rejected since it will place unplanned pressure on the local school system.

6. Local housing need.

There is no call for this development locally. Local residents not only do not need this development, but they consider it both unnecessary and undesirable for their housing needs.

The SMDC planning is for the next 20-30 years. This development will hardly contribute to the target numbers of houses, and there is no urgency to add a development on this scale to the portfolio, if at all, in order to meet the targets.

Conclusion: There is no local need for this development and it will make a negligible contribution to *long term* Council targets. It should be rejected since it makes no contribution to local need, sustainability or plans.

7. Traffic congestion and children.

For those living in Lower Tean where there are no shops and no employers, there is no alternative to the car. Local residential streets are already over-burdened with parked cars. Moreover there is no provision for children's play areas in the village and children are often seen playing on the street.

The development will add another 7 – 14 cars which will use the roads connecting to Heath House Lane for access – and add to the problems there.

There is only one parking space planned per house – this is unrealistic.

Conclusion:

The development is not sustainable in terms of the addition to local traffic given the local circumstances. It should be rejected as unsustainable.

8. There are more appropriate brownfield sites locally.

To achieve the aims of the plans for future housing there are plenty of Brownfield sites locally that could be used in preference to Greenfield sites. For example, Fole Dairy. Indeed the Fole site is large enough to make a meaningful contribution to housing targets, whereas the proposed site is not.

Brownfield development is more sustainable than this greenfield proposal. The developer's proposal does not contribute to the wider regional aims and sustainability.

Conclusion: The proposal is not sustainable since it uses a Greenfield site when appropriate Brownfield options exist locally. This proposal for unnecessary Greenfield development should be rejected.

9. There is too much development planned for the Tean Valley compared to the Staffs Moorlands District Council area as a whole.

Given the size of the Tean Valley area, there are a disproportionate number of housing plans and developments. The density is ten times the average for the Council's area. Other letters of objection make this point very well.

Conclusion:

There is a disproportionate level of development in the Tean Valley compared to the Council's area as a whole, and it is unsustainable. The proposal should be rejected.

10. Interference with the Landscape Context of a Designated Heritage Asset.

See Appendix 2. Bowl Barrow

- The National Planning Policy Framework (NPPF) states that the Applicant is obliged to consider the setting/landscape context of Designated Heritage Assets and in particular Scheduled Monuments (Clause 128 NPPF)
- The Applicant has failed in his duty to consider setting and landscape context with regard to the Barrow and gives it no consideration.
- The Barrow is known to be of a very rare and unusual type. Historic England's records indicate that archaeology remains *on the ancient land surface* around the Barrow. This must include the *landscape context* not just the immediate area.
- The Barrow is on a local high point in the Tean Valley. Both the hill and plot LT001 are important part of its setting and landscape context.
- This development will irreversibly harm the setting and landscape context of this unusual type of Barrow and is therefore unsustainable.
- The Local Authority are obliged to consider setting and landscape context in their evaluation of planning applications (NPPF paragraph 129).
- This development will irreversibly harm the landscape setting of the Scheduled Monument
This development will irreversibly harm the setting/landscape context of this unusual type of Barrow and is therefore unsustainable. The site is inappropriate. *The Applicant has failed in his obligation under the NPPF to consider this. It is an NPPF obligation of the Local Authority to consider this in ruling on the planning application.*

Conclusion:

The revised plans still make a significant impact on the Landscape Setting. The plan should be rejected.

11. Community objection.

The applicant has under-represented the level of community opposition in the written proposal. Nearly 300 people objected to the previous submission. This is a massive fraction of the local population. We are telling the Council that we do not want this development and urge you to support us.

12. Summary.

The development is outside the Council's own Development Area and should be rejected on this count alone. The proposal has not taken into account local surface water conditions including local flooding, and there are no credible plans to deal with it.

The applicant's paperwork (Drainage Report) clearly state that he is going for 20 houses. The plans for an overly-large access road make it clear that this application is a stalking horse for something bigger and even more inappropriate

There is nothing said about the form and mass of the proposed development. In any case this is a moot point – this site is inappropriate as it is outside the Development Area.

The local school cannot cope.

There is no local need for this housing and it will not help the long term plan.

This development will exacerbate local traffic issues in residential streets with children.

There are large brownfield sites nearby –building on this site locally is wholly unnecessary.

Even this revised development will impinge on the landscape setting of a Designated Heritage Asset.

The weight of community opinion is against this development – hundreds of people locally consider it inappropriate and unsustainable.

I urge the Council to reject this proposal and not to be distracted from community needs.

Yours sincerely,

Prof Ken Durose
24 Aug 2016

Appendix 1. Map and SMDC statement.

a) Statement on the validity of the planning map from Staffs Moorlands District Council.

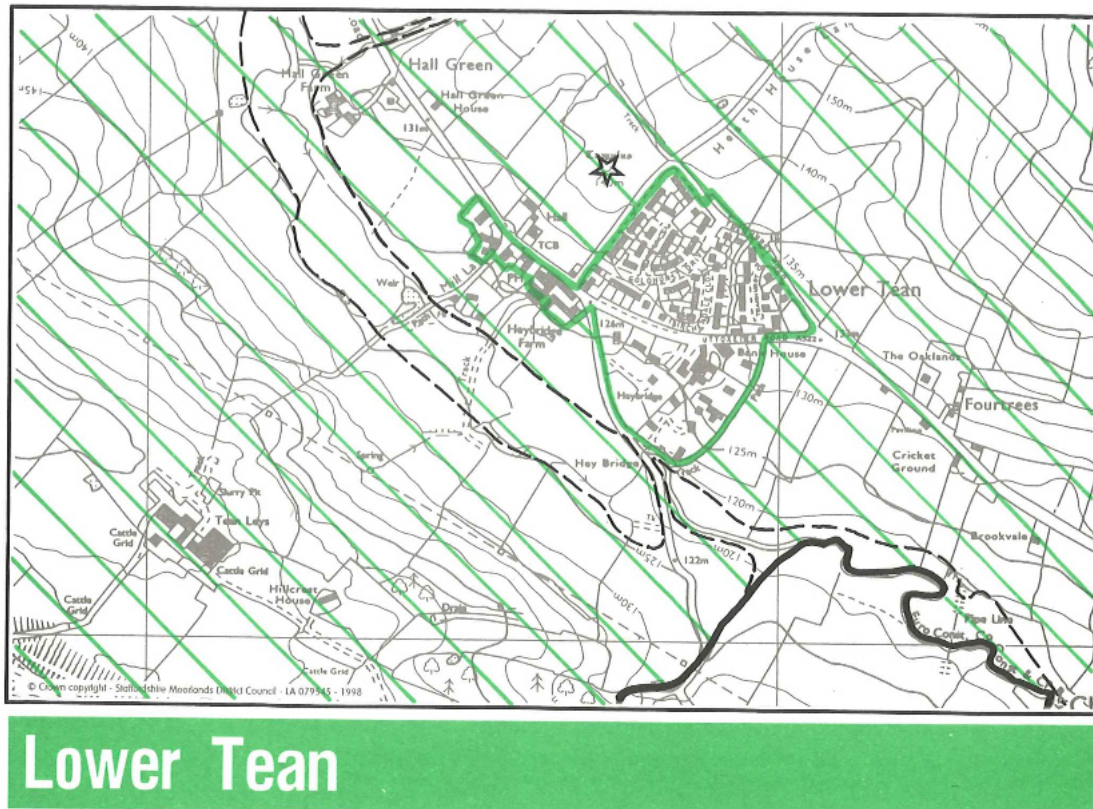
Reference <http://www.staffs Moorlands.gov.uk/sm/council-services/local-planlocal-development-framework/policies-maps>

Accessed 05 Jan 2015

"The development boundaries and Green Belt boundaries within the 1998 adopted Staffordshire Moorlands Local Plan are still in force until such time as they are reviewed as part of the Site Allocations work currently being undertaken."

b) The present map extract showing that the site of the proposed development is outside the development area and is part of a Special Landscape Area.

From the 'Staffordshire Moorlands Local Plan 1998', p149



Appendix 2 Extracts from Drainage Report from KRS Environmental, Powys, Wales (March 2016)

"2.8 Groundwater Levels

No ground investigation has been undertaken at the site."

The engineer clearly states that he has not assessed the ground! The assessment relies on large scale geological maps and boreholes off site. No work has been done to assess the local conditions. This clearly reduces the value of the report very considerably.

2.13 Permeability / infiltration rate.

"As no site geotechnical information on the permeability and infiltration rate at the site has been acquired at this stage it is not possible to comment definitively upon the suitability of infiltration based systems."

Comment:

The engineers admit that they have no concrete information about this site!

Incredibly they go on to recommend that soakaways will help discharge surface water to ground.

"4.5.1 Discharge to ground.

.....the ground conditions suggest infiltration techniques such as soakaways may work and may provide a suitable option at the site (see Section 2.13)."

Comment:

The engineer has not checked the groundwater conditions nor the local geology: the finding that groundwater may be dealt with by soakaways and similar is seriously flawed. Alternatives are not feasible – see below, section 4.7.

3.2 Existing Foul Sewers

Comment:

The text makes it clear that the area is known to be served only by two 150mm diameter Severn Trent Water public foul sewers in Uttoxeter Road. The text recommends that the area be surveyed for the existence of private sewers. There is a clear implication that the existing provision is inadequate and that to proceed without concrete plans to boost the provision would be inadequate. Nevertheless the applicant makes no concrete provision for additional foul drainage for the new development.

4.0 Surface water

4.2 Site Areas

"It is understood that the existing drainage infrastructure at the site efficiently and effectively manages surface water runoff generated at the site. As there is no history of surface water flooding at the site it is likely that the current drainage system is sufficient for the current and proposed site use.

It is understood that the proposals are for up to twenty dwellings."

Comments:

a) This statement is wrong: there is a history of flooding locally, both with surface water, runoff down Heath House Lane (which becomes a watercourse in storm conditions. Moreover, there was formerly a shallow pond in the corner of the site nearest to Heybridge Cottage. This was filled in by Mr Vernon the farmer in the 1960s.

b) The applicant is clearly interested in building 20 houses not the stated seven

“4.5.2. Discharge to Surface Water Body

Discharge to a water body will not be possible”

Comment:

The report clearly agrees that ground water **cannot** be discharged into the local river system. But the alternatives below are not feasible either.

4.7.1 Assuming Infiltration

At this stage it is proposed that the impermeable areas of the site could be discharged to soakaways. The soakaways would be sized according to on the site infiltration rates obtained during infiltration/soakaway tests.

Comments:

This is clearly the consultant’s preferred option. But it is based on insufficient evidence – there has been no investigation of the geological conditions on site. Local experience suggests that the ground is impermeable and that there are local problems with flooding.

4.7.2 – assuming no infiltration

Comments:

The stated alternative is storing water on site to prevent floods. Elaborate schemes involving a water butt for each house and storage are invoked.

The plans for preventing floods with this multitude of little measures is not credible.

Table 8 – indicates that a stored volume of 414m³ is needed – i.e. a pond 20 x 20 meters square.

There is no provision for such a 20 x 20 meter pond on the plans.

Conclusion:

The report is not based on full and proper site investigations. A careful reading clearly indicates that there will be a problem in disposing of a) sewage (insufficient plans) and b) groundwater.

For groundwater, the development will exacerbate the existing local problems with flooding in the basements of buildings and with surface water.

The report clearly steers the developer towards using soakaways and similar. However, the ground is known locally not to be permeable.

For sewage, the development seems to rely on the existence of un-mapped foul drains that may or may not exist.

Appendix 3. Bowl Barrow.

Reference:

<http://historicengland.org.uk/listing/the-list/list-entry/1008540>

Accessed 03 Jan 2015

Bowl Barrow 280m ESE of Hall Green House

List Entry Summary

This monument is scheduled under the Ancient Monuments and Archaeological Areas Act 1979 as amended as it appears to the Secretary of State to be of national importance. This entry is a copy, the original is held by the Department for Culture, Media and Sport.

Name: Bowl Barrow 280m ESE of Hall Green House

List entry Number: 1008540

Location

The monument may lie within the boundary of more than one authority.

County: Staffordshire

District: Staffordshire Moorlands

District Type: District Authority

Parish: Checkley

National Park: Not applicable to this List entry.

Grade: Not applicable to this List entry.

Date first scheduled: 01-Nov-1967

Date of most recent amendment: 19-Jan-1993

Legacy System Information

The contents of this record have been generated from a legacy data system.

Legacy System: RSM

UID: 22419

Asset Groupings

This list entry does not comprise part of an Asset Grouping. Asset Groupings are not part of the official record but are added later for information.

List entry Description

Summary of Monument

Legacy Record - This information may be included in the List Entry Details.

Reasons for Designation

Bowl barrows, the most numerous form of round barrow, are funerary monuments dating from the Late Neolithic period to the Late Bronze Age, with most examples belonging to the period 2400-1500 BC. They were constructed as earthen or rubble mounds, sometimes ditched, which covered single or multiple burials. They occur either in isolation or grouped as cemeteries and often acted as a focus for burials in later periods. Often superficially similar, although differing widely in size, they exhibit regional variations in form and a diversity of burial practices. There are over 10,000 surviving bowl barrows recorded nationally (many more have already been destroyed), occurring across most of lowland Britain. Often occupying prominent locations, they are a major historic element in the modern landscape and their considerable variation of form and longevity as a monument type provide important information on the diversity of beliefs and social organisations amongst early prehistoric communities. They are particularly representative of their period and a substantial proportion of surviving examples are considered worthy of protection.

Despite limited investigation the bowl barrow 280m ESE of Hall Green House survives well. This investigation located pottery and artefacts of flint and jet. Other archaeological remains will exist within the mound and upon the old landsurface. **The location of the barrow on an artificial platform is a rare and unusual feature.**

History

Legacy Record - This information may be included in the List Entry Details.

Details

The monument includes a bowl barrow located on a local high point in the Tean Valley 280m ESE of Hall Green House. It survives as an oval earthen mound up to 2m high with maximum dimensions of 24.5m by 20m. The barrow is located on an artificial platform which is 0.1m high and extends a further 5m beyond the barrow edge. Limited investigation of the mound located pottery sherds, flint artefacts and a jet ring.

MAP EXTRACT The site of the monument is shown on the attached map extract. It includes a 2 metre boundary around the archaeological features, considered to be essential for the monument's support and preservation.

Selected Sources

Other

SMR No. 114, Staffs SMR, Round Barrow N of Lower Tean,
To Robinson K D MPPFW, Meeson, RA (County Archaeologist), (1992)
National Grid Reference: SK 01721 38741