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Planning, Design and Access Statement

Outline Application for Residential Development with all Matters Reserved Except for Means of Access

Cecilly Mill Regeneration Project

Cecilly Mill, Cheadle

September 2017

Project	Cecilly Mill Regeneration Project
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1 Introduction

1.1 JMI Planning is a Midlands based town planning consultancy. Its directors are chartered town planners with over 30 years' combined experience in both the public and private sector.

1.2 The author of this appraisal, Jim Malkin, has worked as a principal planning officer in local government, and more recently as a planning consultant in the private sector. He has extensive knowledge of the planning system and is a member of the Royal Town Planning Institute.

1.3 This statement forms part of an outline application with all matters except for means of access reserved for later approval. The application is supported by the following reports and surveys: -

- Preliminary Ecological Assessment and Emergent Bat Surveys
- Heritage Statement
- Flood Risk Assessment
- Transport Assessment
- Landscape and Visual Assessment
- Tree Report

2 Site and Planning History

2.1 The area of land comprises the site of Cecilly Mill and a triangular area of grassland to the rear. The site was most recently used by JCB Compact Products Ltd but has been vacant for 12 months since manufacturing was transferred to JCB's Harewood Estate facility on the edge of the town. All buildings have been demolished down to the concrete slab and Cecilly Brook, which previously ran under the factory within a culvert, now crosses the site within an open channel.

2.2 The site measures 3.85ha and is well connected to the existing built form of the town. The site is bordered on three sides by existing residential development and has direct access from both Oakamoor and Churchill Roads. The site does not intrude into existing countryside, nor impact on the adjoining recreation ground and associated sports facilities.

2.3 Cheadle is one of the district's most sustainable settlements, and is described as a Service Centre in the emerging preferred options Local Plan. The town is well served with all necessary amenities including a variety of retail options, schools, open space and leisure opportunities, as well as sustainable transport options.

2.4 The site has a wide and varied planning history linked to its previous uses, none of this is however relevant to the wider redevelopment of the site. Significant work has been put into the masterplan and supporting documentation to support the Cecilly Mill Regeneration Project that is being bought forward as part of this application.

2.5 The site and its surroundings are shown on the following aerial photograph.



Figure 1 - Aerial photograph of site

3 The Proposed Development

3.1 Cecilly Mill was previously operated by JCB Compact Products Ltd up until 12 months ago when all operations moved up to the company's Harewood Estate facility, and therefore an alternative use for the site is sought. This application proposes the re-development of this brownfield site and the triangular field to the rear, and given the site is surrounded to three sides by existing residential development its use for residential seems the most logical option.

3.2 It is therefore proposed to redevelop the site for residential purposes for up-to a maximum of 121 dwellings. The application is made in outline with all matters reserved except for means of access.

3.3 The application is accompanied by an illustrative layout prepared by Bi-Design Architecture, a highly regarded local practice with significant expertise in schemes of this nature. The illustrative layout shows how 121 dwellings together with associated open space and improvements to the brook channel could be accommodated on the site. It shows built development predominantly located to the west of Cecilly Brook with open space and a LEAP located adjoining the brook. The layout shows indicative links to the existing footpath network surrounding the site. It should be noted that the precise layout of the site and that of the proposed dwellings and their scale and appearance are reserved for later approval, meaning that this application is concerned solely with the principle of residential development on the site together with the means of access to the site.

3.4 The site is currently provided with two access points, one from Oakamoor Road and one from Churchill Road. These access points will be utilised to serve the residential development. Oakamoor Road provides the principal access to the site and was utilised as the main point of access to the former mill and factory. The access is afforded with good visibility in both directions and is within the 30mph limit. The

Churchill Road access is a secondary access to the site, and is from a post war estate road, again it is provided with good visibility in both directions and is subject to a 30mph speed limit.

4 Planning Policy Context

National Planning Policy Framework

4.1 Annex 1 of the National Planning Policy Framework states that applications for planning permission must be determined in accordance with the development plan unless material considerations dictate otherwise. The policies contained within the Framework are material considerations which should be taken into account in the determination of planning applications. Paragraph 214 gives full weight to development plan policies for a 12-month period from the publication of the NPPF. Paragraph 215 advises that beyond this period, due weight should be given to relevant policies in existing plans according to their degree of consistency with this framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given). Paragraph 216 of the NPPF allows decision takers to give weight to emerging plan policies. The degree of weight that can be attached varies according to the stage of preparation of the emerging plan, the extent to which there are unresolved objections to policies, and the consistency of relevant policies to the NPPF.

4.2 Paragraph 14 advises that at the heart of the National Planning Policy Framework is a presumption in favour of sustainable development. For decision taking, this means approving development proposals that accord with an up-to-date Local Plan; and also in circumstances where the development plan is absent, silent or relevant policies are out-of-date unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework taken as a whole.

4.3 One of the core principles of the NPPF is that planning should proactively drive and support sustainable economic development to deliver the homes that the country needs.

4.4 Paragraph 9 of the NPPF states that "pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people's quality of life, including (but not limited to):

- making it easier for jobs to be created in cities, towns and villages;
- moving from a net loss of bio-diversity to achieving net gains for nature;
- replacing poor design with better design;
- improving the conditions in which people live, work, travel and take leisure; and
- widening the choice of high quality homes.

4.5 Paragraph 49 of the NPPF states that "housing applications should be considered in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites".

4.6 Chapter 7 of the Framework relates to design. Paragraph 58 advises that decision makers should aim to ensure that developments respond to local character and history, reflect the identity of local surroundings and materials, and are visually attractive as a result of good architecture and appropriate landscaping. Paragraph 61 of makes it clear that good design goes beyond purely aesthetic considerations and also relates to how development is integrated into the natural and built environment. Paragraph 63 encourages design which raises the quality of the built environment in its setting.

Staffordshire Moorlands Core Strategy (2014)

4.7 The Staffordshire Moorlands Core Strategy is the key LDF document. It is a strategic District wide plan which influences how and where the Staffordshire Moorlands will develop in the future. The core strategy advises the following with regards to Cheadle:

Cheadle will become a more sustainable settlement, better able to meet its own needs, enhancing and enlarging its role as a significant service centre for the local population and those in its rural hinterland. This will have been achieved through a focus on growth in housing and employment provision with significant complementary investment in the town's social and physical infrastructure. Its town centre will have been enlarged and become more vibrant and attractive supported by a major new supermarket. JCB and other major employers will grow, but the local economy will have been diversified and expanded with new employment areas. It will benefit from improved local public and sustainable transport links focused on the town centre and improved access to other urban areas. With a greater range of housing and employment opportunities Cheadle will have become a more successful and dynamic place where people choose to live and work.

The core strategy also provides the policy background on which planning decisions will be taken, the most relevant of these are as follows:

SS1 - Development Principles

The Council will expect the development and use of land to contribute positively to the social, economic and environmental improvement of the Staffordshire Moorlands in terms of delivering, in partnership with other agencies and services:

- *a mix of types and tenures of quality, affordable homes to meet the needs and aspirations of the existing and future communities*

- *quality local services, including provision for education, healthcare, leisure, community, cultural and tourist facilities in response to anticipated population change and visitor numbers;*
- *easy access to jobs, shops and transport services by all sections of the community;*
- *increased economic prosperity and opportunities for employment and greater local capacity with an educated, skilled and flexible workforce;*
- *a healthy, safe, attractive and well-maintained environment;*
- *development which maintains the distinctive character of the Staffordshire Moorlands, its individual towns and villages and their settings;*
- *development that is undertaken in a way that protects and enhances the natural and historic environment of the District and its surrounding areas both now and for future generations.*
- *development which secures high quality, sustainable environments, efficient and effective use of resources and contributes effectively to tackling climate change and reduced carbon emissions.*

All proposals for development will be considered in the context of the District-wide Spatial Strategy and with regard to both its direct and indirect cumulative impact over the longer term. New development will make the best use of previously developed land and buildings and will follow a sequential approach to the sustainable location of development.

SS1a - Presumption in Favour of Sustainable Development

This policy echoes the presumption in favour of sustainable development as defined by the National Planning Policy Framework.

H1 New Housing Development

New housing development should provide for a mix of housing sizes, types and tenure including a proportion of affordable housing as set out in policy H2, and where appropriate housing for special groups, to meet the needs and aspirations of the current and future population having regard to the Area Strategies in SS5 and SS6.

All development will be assessed according to the extent to which it provides for high quality, sustainable housing and to which it meets identified local housing market needs and the strategy for the area having regard to the location of the development, the characteristics of the site and the economics of provision.

In addition:

- *Housing for special groups, particularly for older people, should meet a genuine and proven local need and demand and be of a scale and in a location which is appropriate to its needs.*
- *Housing proposals of 10 dwellings or more will be required to provide a mix of housing in terms of size, type and tenure on the site. The final mix will be negotiated with the developer based on local housing needs as informed by the Strategic Housing Market Assessment and other relevant factors such as available supply and market demand.*
- *All housing development should be at the most appropriate density compatible with the site and its location, and with the character of the surrounding area. This will generally be within the range of 40 dwellings per hectare or more in or on the edge of town centres , 30 – 40 dwellings per hectare in other urban areas and villages and 20 – 30 dwellings per hectare in remoter rural areas.*
- *Residential development and redevelopment on unidentified (windfall) sites will be permitted up to an indicative maximum scheme size of 9 dwellings within the Development Boundaries of the towns and larger villages, and up to an indicative maximum scheme size of 5 dwellings within the Infill Development Boundaries of the smaller villages. Exceptionally, larger windfall*

schemes may be permitted where it would provide over-riding affordable housing, regeneration, conservation or infrastructure benefits and it would not undermine delivery of the spatial strategy.

- *All new dwellings should aim to be built to "Lifetime Homes" standard in accordance with the current national advice and targets.*
- *All new dwellings must be of sufficient size to provide satisfactory levels of amenity for future occupiers whilst respecting the privacy and amenity of existing occupiers.*
- *All new dwellings must meet the sustainable design and construction requirements set out in policy SD1.*

DC1 – Design Considerations

Advises that *'all development shall be well designed and reinforce local distinctiveness by positively contributing to and complementing the special character and heritage of the area in line with the Council's Design SPD'.* The policy provides a number of criteria that new development should follow.

DC3 – Landscape and Settlement Setting

Advises that *'The Council will protect and, where possible, enhance local landscape and the setting of settlements in the Staffordshire Moorlands'.* The policy then provides a number of criteria that new development should follow.

Emerging Preferred Options Local Plan

4.8 The emerging Local Plan for Staffordshire Moorlands provides the framework for delivering development from 2016 to 2031. It seeks to identify the preferred sites and policies for housing, employment, open space and Local Green Space alongside the boundaries for development and retail boundaries in our towns. The

consultation on the preferred options Local Plan ended on the 22nd September 2017, at this stage the document has not therefore been subject to any robust independent analysis or comment, and can only be given very limited weight in the decision-making process.

4.9 There are a large number of policies within the preferred options Local Plan, the most relevant policies are as follows:

Policy SS 7 provides the wider strategy for the development of Cheadle and advises the following:

The Council and its partners will seek to expand the role of Cheadle as a significant service centre and a market town. This will be achieved through the following actions:

1. *Expand the housing market area and community provision by:*
    - *Increasing the range of available and affordable house types and higher market housing, including for first time buyers and families;*
    - *The development of specific housing sites through new site allocations in the Local Plan. This will include two strategic housing clusters to the north and south of the town, namely:*
        - *Land off Donkey Lane - housing and school development will be supported in line with policy SDC1*
        - *Mobberley Farm - housing development will be supported in line with policy SDC2*
    - *Protecting, increasing and improving the provision and accessibility of open space, sport and recreational facilities in line with the emerging Open, Space, Sports and Recreation Strategy*
    - *Providing additional educational, health and community facilities, including a new primary school to serve north Cheadle at the Donkey Lane site*
2. *Create employment growth and increase the diversity of employment opportunities to meet existing and future needs by:*

- *Supporting the retention and growth of JCB and other existing businesses within the town;*
- *Supporting improved access to JCB and existing employment sites;*
- *The development of employment land through new site allocations in the Local Plan;*
- *Providing facilities and land for new start-up businesses;*
- *Improving and intensifying the use of existing employment areas at New Haden/Brookhouses.*

3. *Expand the role of Cheadle as a significant service and retailing centre for the District by:*
    - *Supporting improvements to the quality and range of the retail offer and supporting town centre uses*
    - *Regenerating and improving the streetscape of the town centre and creating more public realm Expanding the range and diversity of educational, health, sport, cultural and community services and facilities in the town;*
4. *Improve environmental quality and accessibility by:*
    - *Addressing traffic related issue in the town centre and along the A521 and A522 by working with partners to develop and implement transport improvements*
    - *Improving pedestrian and cycle links across the town and into the countryside, including the implementation of the Green Infrastructure Strategy*
    - *Improving public transport links between the town and other main settlements;*
    - *Promoting the role and historic character of the town and its links with the Churnet Valley as a visitor destination.*

Policy H 1 New Housing Development

This policy replicates the requirements of policy H1 of the Core Strategy with additional advice in relation to housing on non-allocated sites as set out below:

4) Housing development on sites not allocated for such purposes in Policy H2 will be supported as follows:

a) Within the development boundaries of the towns and larger villages, residential development and development on unidentified (windfall) sites will be permitted, subject to compliance with the Spatial Strategy and wider Local Plan policies

b) Outside of the development boundaries, limited infill residential development of an appropriate scale for the Spatial Strategy will be supported, provided that: The development will adjoin the boundary of a larger village and be well related to the existing pattern of development and surrounding land uses, or; The development is well related to the existing pattern of development of a smaller village and will not create or add ribbon development or lead to sporadic pattern of development; and

c) In all cases: The development will not lead to a prominent intrusion into the countryside or have an adverse impact of significance to the character of the countryside; and; it would have reasonable access by foot, cycle or public transport to existing services and community facilities; and the local and strategic infrastructure can meet the additional requirements arising from the development. Where applicable, national Green Belt policy will apply in determining the suitability of proposals for limited infilling and the re-development of previously developed sites

Policy H2 – Housing Allocations

The following sites will be allocated for housing or mixed use development. The Council will work with developers and the local community to bring forward sustainable developments in accordance with the other policies in the Local Plan.

Cheadle

Location	*No of dwellings*
Cheadle North Strategic Development Area (CH001 & CH132) 320 Policy DSC 1	*320*
Cecilly Brook Strategic Development Area (CH002a, CH002b, 106 CH024) Policy DSC 2	*106*
Land to the rear of Froghall Road, Cheadle (CH004)	*45*
Land to the rear of the Birches (CH013)	*51*
Stoddards Depot, Leek Road (CH015)	*32*
Land north of the Green, Cheadle (CH020)	*42*
Mobberley Strategic Development Area (CH085A, CH085B, 430 CH085C, CH085D, CH128) Policy DSC 3	*430*

Policy DC 1 – Design Considerations

As with the Core Strategy this policy advises that *'all development shall be well designed and reinforce local distinctiveness by positively contributing to and complementing the special character and heritage of the area in line with the*

Council's Design Guide SPD'. The policy then provides a number of criteria that new development should follow.

Policy T 1 - Development and Sustainable Transport

The Council will promote and support development which reduces reliance on the private car for travel journeys, reduces the need to travel generally and helps deliver the priorities of the Staffordshire Local Transport Plan. The policy then provides a number of criteria with regards to achieving this aim.

Policy DSC 2 – Cecilly Brook Strategic Development Area

Land amounting to 3.1 ha is allocated for residential development of approximately 106 dwellings comprising:

- *Land at Moor Lane Farm (1.7 ha) of approximately 61 dwellings; and*
- *Land off Churchill Road (1.4 ha) of approximately 45 dwellings*

Development will be subject to compliance with other relevant Local Plan policies; and

- *A master-plan that considers the growth that may impact on the Cecilly Brook Local Nature Reserve (LNR) in order to manage the impact on the Green Infrastructure Network and the LNR to ensure that Local Plan policy requirements can be met for minimising impacts on biodiversity (and providing net gains in biodiversity where possible); and establishing coherent ecological networks that are more resilient to current and future pressures; as well as enabling water quality improvements in line with the Water Framework Directive objectives;*

- *Surveys and actions recommended by the Extended Phase 1 Habitat Survey and Local Wildlife Assessment; Priorities and actions identified in the Council's Green Infrastructure Plan;*
- *A site specific flood risk assessment and early discussions with the Lead Local Flood Authority;*
- *Mitigation measures identified in the Council's Landscape, Local Green Space and Heritage Impact Study; Contributions towards infrastructure, public open space, education, services and other community needs as required;*
- *Affordable housing in accordance with H3; and Public rights of way need to be protected*

Five Year Land Supply

4.10 The latest position with regards to the five-year land supply was published on the 31st March 2017 and concluded that the Council can demonstrate a 1.99-year supply of deliverable housing land. This is a significant shortfall in deliverable housing land and means that the presumption in favour of sustainable development as defined by the National Planning Policy Framework is engaged in decision taking.

5 Planning Considerations

Principle of Development

5.1 The application site is within the development boundary for Cheadle as defined by the Core Strategy with a large portion of the site forming a proposed allocation for new residential development in the preferred options Local Plan.

5.2 The core strategy and the emerging Local Plan allocate Cheadle as a one of the District's three main towns, and define it as a service centre where growth within the borough will be concentrated. Therefore, it is anticipated that the town will grow significantly in the short to medium term.

5.3 The preferred options Local Plan seeks to allocate the land to the rear of Cecilly Mill for residential development, and this portion of land is also included within the Cecilly Brook Strategic Development Area which seeks to allocate areas of land adjoining the Cecilly Brook for development.

5.4 The proposed residential allocation does not include the site of the former Cecilly Mill. This portion of the site was previously occupied by JCB Compact Products Ltd who recently transferred production from Cecilly Mill to the Harewood Estate facilities on the edge of the town and are undertaking a major expansion of these facilities to provide significant site efficiencies and additional employment in the district. This has left the Cecilly Mill site vacant, and with all buildings demolished the site is available for development in the short term. In land use terms, the utilisation of the land associated with Cecilly Mill alongside the field to the rear for residential development makes logical and practical sense, and will enhance the Cecilly Brook Strategic Development Area.

5.5 Policy SS 7 seeks to support the growth of existing businesses including the retention

and growth of JCB. Allowing the former Cecilly Mill site alongside the land to the rear to be bought forward solely for residential development would further support the company's (already extensive) investment in the town.

5.6 Cecilly Mill is not defined as a protected employment site and nor is it allocated for any alternative purpose. The site itself is not appropriate for modern employment uses and is enclosed on three sides by existing residential uses, and the fourth by a proposed housing allocation. It is therefore highly unlikely that potential businesses would want to locate so close to residential properties owing to potential problems associated with this type of relationship.

5.7 Of critical importance in the determination of this application is the Councils current land supply position. The last published position with regards to the five-year land supply advises that the Council can exhibit a 1.99 year supply of deliverable housing, therefore in line with the National Planning Policy Framework the presumption in favour of sustainable development is engaged.

5.8 Paragraphs 7 and 8 of the NPPF identify three components to sustainable development: economic, social and environmental. Achieving sustainable development requires economic, social and environmental gains to be sought simultaneously.

Environmental

5.9 Cheadle has been identified by the Council as a service centre as has been identified for significant growth over the Local Plan period. It is therefore clear that the Council is highly supportive of new development in Cheadle.

5.10 Cheadle has a large number of facilities and amenities, including shops, supermarkets, schools and leisure facilities, alongside numerous employment opportunities provided by major employers such as JCB and also smaller companies. Cecilly Mill is located close to the centre of the town and therefore the majority of facilities and amenities are within walking distance of the site, all of the main employment areas of the town are also readily accessible by foot, or by cycle.

5.11 The application site lies is also well served by public transport and has easy access to bus services connecting it to the rest of the town, and also larger conurbations including Stoke on Trent which has a wider range of employment opportunities. It is therefore clear that Cheadle comprises of a highly sustainable location which is capable of accommodating a significant level of growth.

5.12 The application site is predominantly previously developed land (excluding the land of the proposed residential allocation). Encouraging the re-use of previously developed land is one of the core principles of the National Planning Policy Framework, and accommodating some of the District's housing growth requirement on this partly brownfield site would reduce pressure on the council to release Green Belt land adjoining the town for residential development.

5.13 The indicative layout which accompanies the application shows built development sensitively located within the site, this allows for opportunities to significantly improve green infrastructure in the area. The layout anticipates that areas of open space will be provided to link into the existing Cecilly Brook Nature Reserve, providing both improved access to this area for residents, and significant ecological enhancement. In addition, improved footpath links are proposed which will assist in improving access to wider areas of open spaces improving the connectivity and permeability of the area.

5.14 The application site is located between existing built development and the proposed housing allocation to the south. The proposals would therefore be viewed in the context of existing and proposed housing development, and would not encroach into the surrounding countryside.

5.15 The application is accompanied by an ecological appraisal, and detailed bat surveys which conclude that the proposals would not harm protected species or their habitat. The arboricultural survey advises that no trees of any merit will be removed to enable the development to take place.

5.16 In summary, the application site is predominantly comprised of previously developed land in a sustainable location. The site is relatively central within Cheadle and does not impact adversely on the character and appearance of the area. It is therefore concluded that the environmental impact of the proposal would be minimal.

Economic

5.17 One of the core principles of the NPPF is that planning should proactively drive and support sustainable economic development to deliver the homes that the country needs. Paragraph 19 of the NPPF prescribes significant weight to the economic benefits of proposals in the overall planning balance.

5.18 The proposals would deliver both short term and longer term economic benefits. In the short term the proposal would bring about the economic benefits associated with new development including supporting the construction industry both directly through construction jobs on site and indirectly through the supply chain. The local planning authority would also benefit through the New Homes Bonus.

5.19 In the medium to long term, future occupants of properties on the site will rely on local services and facilities, which will help to safeguard their retention and potentially encourage new services in the village. The proposals would also boost the local labour supply, broadening the choice of suitable candidates for local employers.

5.20 With regards to the loss of the existing employment site all buildings and infrastructure have been removed from the land. The loss of this site for employment purposes for the reasons set out in paragraphs 5.4 to 6.6 will not have an adverse impact on available employment land in the locality. The preferred options Local Plan proposes significant extensions to existing employment areas in the town that will meet the needs of the local area.

Social

5.21 The proposals will provide a significant contribution towards the Council's housing requirement, and will provide high quality homes to meet an identified need. The site is located close to the town centre and adjoining residential areas thereby encouraging community cohesion, and ensuring that new residents do not feel isolated. The proposals would therefore contribute positively towards the vitality of the local community, increasing its population with new residents that can support and enhance local services and partake in social and community activities.

5.22 The proposals provide a mix of housing types to meet the needs of the community. The proposals are therefore socially inclusive.

5.23 Of critical importance in the determination of this proposal is the fact that the entire site is immediately available for residential development. In light of the Council's current land supply position the approval of this application would provide for significant benefits for the Council in housing supply terms.

5.24 The proposals therefore constitute sustainable development in environmental, economic and social terms. In line with the presumption in favour of sustainable development set out in the National Planning Policy Framework, the broad principle of additional housing in this location is therefore considered acceptable.

Other Material Considerations

5.25 The following technical considerations are also of relevance to this proposal.

Highway Safety

5.26 Paragraph 32 of the National Planning Policy Framework states that development should only be refused on highway grounds where its impact upon the network would be severe.

5.27 The development is provided with two accesses; the primary access is provided from Oakamoor Road with a secondary access from Churchill Road. Both of these are in broadly the same position as existing accesses which currently serve Cecilly Mill. Both accesses are in areas subject to 30mph speed limits.

5.28 The application is accompanied by a Transport Assessment completed by SCP Transport which concludes that adequate visibility can be provided at the site accesses. It also confirms that adjoining highway network and nearby junctions have the capacity to accommodate the increased traffic that would be generated by the proposal.

5.29 The proposals will also provide a residential link road through from the site from removing the need for vehicles to have to manoeuvre around King Edward Street and Cecilly Street, or through the town centre. This will provide a net benefit to traffic leaving Churchill Road and the adjoining estate.

5.30 It has therefore been clearly demonstrated that the proposals would not severely impact upon the highway network.

Flood Risk

5.31 The application is accompanied by a Flood Risk Assessment (FRA) which concludes that Based on information on flooding obtained from the Environment Agency, Staffordshire Moorlands District Council's SFRA, the area of the site in which development is proposed has been shown to lie within an area at low risk of flooding from the adjacent Cecilly Brook and its tributary.

5.32 In terms of potential flooding from pluvial sources, infiltration has been found to be non-feasible option for draining the site and it is therefore proposed that the residential properties, associated hardstandings and the adoptable road network within the proposed residential development is to be discharged to Cecilly Brook at a rate restricted to the pre-development greenfield runoff rate. It should be noted though that the area of the site associated with Cecilly Mill is currently entirely hardstanding and at this stage does not have any permeable surfaces that allow water to 'soak-away'.

5.33 Providing the mitigation measures discussed or similar measures are implemented it is considered that the risk of flooding to the site and adjacent land will be minimal.

Character and Appearance of the Area

5.34 The built context of the application site is one characterised by variety. Cecilly Street and King Edward Street to the west of the site are predominantly characterised by traditional terraced properties which will have been linked to the previous mill use, further to the west dwellings on Churchill Road are post-war semi-detached properties set within good sized plots. Oakamoor Road is again characterised by large post-war semi-detached properties in good sized plots with frontage car parking. To the east and north of the site are more modern estate style properties which provide the immediate context for the proposal.

5.35 The application is submitted in outline with all matters reserved except for means of access. As such, the precise layout of the site and the scale and appearance of properties has yet to be determined. However, the illustrative layout shows a well-designed scheme which would contribute positively towards the varied character of its surroundings.

5.36 Dwellings have been arranged to create well-defined spaces, with attractive vistas provided both into and out of the development. It is anticipated that the development would be outward looking with properties fronting onto Oakamoor Road, and active frontages provided to all areas of the public realm. Whilst detailed designs of the proposed dwellings have yet to be prepared, it is anticipated that they would take cues from existing built development in the area to ensure that they contribute positively to the character and appearance of the surrounding area.

5.37 The illustrative layout shows significant improvements to the Cecilly Brook channel itself with the provision of additional landscaping, tree planting and significant areas of open space adjoining the brook. The layout also shows the provision of a locally equipped area of play (LEAP) alongside Cecilly Brook. New linkages are provided into the adjoining footpath network to ensure that the site is well connected to existing open spaces and built form.

5.38 A full Landscape and Visual Appraisal of the site has been undertaken by Bright & Associates. This concludes that there is sufficient landscape capacity to successfully integrate the proposed development, and advises the proposal will have a 'neutral' impact.

5.39 The LVA advises that in the longer term, the landscape proposals such as tree planting will have a positive influence both in terms of providing separation between different elements within the site and by maintaining a degree of separation between existing residential development within a wider context.

5.40 The illustrative layout therefore demonstrates that the site can comfortably accommodate the level of development proposed alongside the provision of adequate public open space without detrimentally affecting the character or appearance of its surroundings, or the wider landscape.

Residential Amenity

5.41 Whilst detailed designs and layouts of individual dwellings have yet to be prepared, the illustrative layout demonstrates that up to 121 dwellings can be accommodated upon the site whilst retaining sufficient separation to neighbouring dwellings to avoid unacceptable impacts upon daylight and privacy.

5.42 The proposals will remove a non-conforming use from the locality and will result in significant improvements in terms of noise and intrusion. Cecilly Mill was operated on a 24hr basis and a large number of machines were parked and operated in close proximity to residential dwellings. Therefore, the development of the site for residential purposes would be of net benefit compared to the lawful use of the land.

Ecology

5.43 Section 11 of the NPPF requires the impact of development on protected species to be carefully considered as part of the decision-making process.

5.44 The application is accompanied by a Preliminary Ecological Appraisal (PEA) and Emergent Bat Surveys. This confirms that on site 'field signs' for Water Vole and Bats were recorded, the bat emergent surveys have confirmed that there are no bat roosts on the site. The reports confirm that subject to appropriate mitigation measures the proposal will have no adverse impact on any protected species or their habitat.

Heritage

5.45 The application is accompanied by a Heritage Statement completed by C. Henshaw that considers the heritage impacts of the scheme. This advises that there is some potential for prehistoric activity and medieval and earlier post-medieval industrial archaeology on the site, and therefore recommends that a watching brief be completed as part of any re-development works.

Section 106

5.46 The application is of a scale where it would be expected to provide developer contributions should viability allow. In this instance, the developer is in the process of completing a viability assessment, which from preliminary investigations it is anticipated will show that a reasonable developer profit cannot be achieved from the site given the abnormal development costs and the low re-sale values in the town.

5.47 In light of the likely conclusions of the viability assessment the developer is seeking to enter into negotiations with regards to section 106 requirements. The NPPF refers

directly to the delivery of development and development viability in paragraph 205 which advises the following:

'Where obligations are being sought or revised, local planning authorities should take account of changes in market conditions over time and, wherever appropriate, be sufficiently flexible to prevent planned development being stalled'

5.48 The National Planning Practice Guidance (NPPG) offers advice in respect to viability. In paragraph 016 (Reference ID: 10-016-20140306) the NPPG refers directly to decision making and advises:

'Where the deliverability of development may be compromised by the scale of planning obligations and other costs, a viability assessment may be necessary. This should be informed by the particular circumstance of the site and the proposed development in question'.

Paragraph 016 also gives specific advice with regards to brownfield land and viability stating the following:

The National Planning Policy Framework sets out a core planning principle that in decision-taking local planning authorities should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value.

Local planning authorities should seek to work with interested parties to promote the redevelopment of brownfield sites, for example Local Enterprise Partnerships.

To incentivise the bringing back into use of brownfield sites, local planning authorities should:

- *look at the different funding mechanisms available to them to cover potential costs of bringing such sites back into use*

- *take a flexible approach in seeking levels of planning obligations and other contributions to ensure that the combined total impact does not make a site unviable.*

5.49 Paragraph 019 (Reference ID: 10-019-20140306) of the NPPG requires local planning authorities to understand the impact of the planning obligations on specific proposals and states *that 'where an applicant is able to demonstrate to the satisfaction of the local planning authority that the planning obligation would cause the development to be unviable, the local planning authority should be flexible in seeking planning obligations'*. This paragraph goes onto state that this is '*particularly relevant for affordable housing contributions which are often the largest single item sought on housing developments. These contributions should not be sought without regard to individual scheme viability'.*

5.50 We will submit the viability assessment when complete and at this stage we will seek to negotiate with the Council with regards to section 106 requirements subject to the detailed findings.

6 Conclusions

6.1 The application site constitutes predominantly previously developed land sustainably located near to Cheadle town centre; a significant portion of the site (the greenfield element) is a proposed residential allocation in the recently published preferred options Local Plan. Staffordshire Moorlands District Council cannot at this stage exhibit a five-year supply of deliverable housing land, and therefore the presumption in favour of sustainable development is engaged.

6.2 The site lies within the development boundary for Cheadle which is defined as a service centre and one of the three main towns in Staffordshire Moorlands in the adopted Core Strategy and also in the preferred options Local Plan. The town has all necessary facilities and amenities to serve the development, and is also provided with good public transport links to larger conurbations.

6.3 The site is adjoined by existing residential development and will therefore be viewed entirely in the context of existing built development. The indicative layout shows how 121 units can be acceptably located on the site without having any adverse impacts on the character and appearance of the area, or on the amenities of the occupiers of neighbouring properties.

6.4 Supporting reports show that there are no technical issues that preclude the development of the former Cecilly Mill.

6.5 On this basis we respectfully request that planning permission be granted for this proposal.