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27/02/2025

Dear Ben

PRE-APPLICATION PLANNING ADVICE

APPLICATION NUMBER	PAD/2024/0029
LOCATION	Land off Manifold Drive / Rakeway Road, Cheadle
PROPOSED DEVELOPMENT	Residential development consisting of 70 dwellings

With reference to your request for pre-application planning advice relating to residential development proposals at Manifold Drive, Cheadle and our meeting held on 18 February 2025, I provide a formal pre-application response.

Since the meeting, I have had the opportunity to consult further with colleagues about the proposal. This letter provides an assessment of the proposal based on the site and its surroundings, local plan policies and national planning policy guidance.

The Site

The site comprises a 2.23 hectares agricultural field situated to east of Manifold Drive. The site is agricultural pasture land and has a number of mature trees and hedgerows. It is open to Manifold Drive with a post and wire fence and there are mature trees spaced out along the frontage. The site lies outside of the defined settlement limits for Cheadle and is therefore classified as open countryside.

The proposals map also indicates that the site is within a Mineral Safeguarding Area and Coal Development High Risk Area.

Two sites of biological importance are located south east of the site, Freehay SBI and Rakeway House Farm (south of). The nearest one, Rakeway House Farm SBI is about 250m at its closest point.

Proposal

The pre-application advice submission seeks views on residential proposals comprising outline planning permission for the erection of up to 70 dwellings with associated access, landscaping

and infrastructure. All matters would be reserved, except for the principal site access from the public highway.

No detailed layout plans have been submitted with the pre-application advice request, instead an indicative landscape led masterplan has been submitted which shows two development parcels and access point, trees and landscaping and sustainable drainage swales and ponds.

The pre-application submission comprised a covering letter, pre-application planning report, Landscape strategy plan, Landscape and Visual Impact Assessment, Ecological Assessment, Tree survey, Flood Risk Assessment & drainage strategy, Geo-environmental report and Mining risk assessment, Transport Statement and topographical survey.

Development Plan

The Development Plan comprises the Staffordshire Moorlands Local Plan (September 2020) and relevant policies include the following:

Policy SS1 Development Principles
Policy SS2 Settlement Hierarchy
Policy SS3 Future Provision and Distribution of Development
Policy SS7 Cheadle Area Strategy
Policy SD1 Sustainable use of resources
Policy SD3 Sustainability measures in Development
Policy SD5 Flood Risk
Policy H1 New Housing Development
Policy H2 Housing Allocations
Policy H3 Affordable Housing
Policy DC1 Design considerations
Policy DC 3 Landscape and Settlement setting
Policy C2 Sport, Recreation and Open Space
Policy C3 Green Infrastructure
Policy NE1 Biodiversity and Geological Resources
Policy NE2 Trees, Woodland and Hedgerows
Policy T1 Development and Sustainable Transport

Supplementary Planning Documents (SPD)

Developer Contributions SPD
Staffordshire Design Guide SPD

Planning Assessment

Principle

The site is situated to the south east of Cheadle and is located outside of settlement boundaries and is therefore deemed countryside where residential development would not be permitted as it is contrary to the development plan.

The site is identified in the Landscape and Settlement Character Assessment (2008)¹ as an 'important landscape setting to settlement'. The site falls into zone CHECZ1 of the Staffordshire

¹ [Landscape and Character Assessment](#)

Moorlands Historical Environmental Character Assessment (2010)² which is considered to be an area of greatest sensitivity where the 'evidential, historical, aesthetic and community values are all rated as being high'.

The site was considered in the Strategic Housing Land Availability Assessment (SHLAA 2015) it falls within land parcels identified as CH092 and CH096. The parcels were classified as a 'C' undeliverable and were not taken forward into the site options stage of the Local Plan (2015) due to the important landscape setting to the settlement, significant intrusion into the countryside and in terms of CH092 proximity to the SBI. However, it should be noted that CH092 and CH096 cover much larger parcels of land than the proposed site.

As discussed the Council cannot currently demonstrate a five year housing land supply and this was confirmed in the latest supply statement confirming 3.58 years @ 1st April 2023. Recent planning appeals have also reaffirmed the housing land supply shortfall.

Paragraph 11 of the NPPF states that 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. Where policies relating to the supply of housing are out-of-date (as a result of not having a five year supply of deliverable housing land), paragraph 11d(ii) of the NPPF is triggered - the 'Tilted Balance'. The NPPF December 2024 update specifies that this should include particular 'regard to key policies for directing development to sustainable locations, making effective use of land, securing well designed places and providing affordable homes, individually or in combination'.

Cheadle is a sustainable settlement and policy SS3 states that 25% of the overall housing requirement for the district will be located in Cheadle and Policy SS4 sets out how the housing requirement for Cheadle will be met by allocations totalling 1026 dwellings and a windfall allowance for small sites.

As the site lies outside the Cheadle development boundary Policy SS10 'Other Rural Areas' is more directly applicable. Policy H1 states that in addition to the allocated sites, unidentified residential windfall sites will be allowed within the development boundary (subject to wider Local Plan policies). Policy H1 does not provide flexibility for additional residential sites, such as this, on the edge of the towns outside the development boundary as the requirement is already met within the Cheadle development boundary. However, as this part of policy H1 restricts the supply of housing, less weight can be given to the policy as specified in NPPF paragraph 11d.

In summary, whilst the site is outside of settlement boundaries where housing development is resisted, the LPA cannot currently demonstrate a five year housing land supply so in accordance with the NPPF paragraph 11 the tilted balance is engaged. Accordingly, sites outside development boundaries in sustainable locations can be considered more positively for housing if the benefits outweigh the harm. However, as previously highlighted, there are landscape sensitivities with the subject site.

Housing

The NPPF and local plan policy H1 requires residential development to provide for a mix of housing sizes, types and tenures including affordable housing to ensure developments meet local housing needs. Policy H1 states:

² [Staffordshire Landscape Character Areas SPG](#)

Housing proposals of 10 dwellings (or 0.5ha) or more will be required to provide a mix of housing in terms of size, type and tenure on the site unless viability or other circumstances exist. The final mix will be negotiated with the developer based on housing needs as informed by the SHMA or successor document and other relevant factors such as available supply and market demand.

The Staffordshire Moorlands Strategic Housing Market Assessment (SHMA February 2017), which is the evidence base for the local plan, identifies that there is a need for smaller, one and two bedroom properties and recommends a district wide housing mix of: 60% 1 and 2 bedroom and 40% 3 or 4 bedroom dwellings.

Policy H1 requires all dwellings to comply with the National Described Space Standard (NDSS) and delivered to meet accessibility standards set out in the Optional Requirement M4(2) of Part M of the Building Regulations. Policy H1 also encourages large development schemes to consider including self-build or custom build housing plots.

As the application is proposed to be an outline submission, matters such as housing mix and NDSS could be conditioned to ensure that a reserved matters scheme is in accordance with the policy requirements of H1.

Affordable Housing

The NPPF and local plan policies seek the provision of affordable housing on all major housing development schemes. Policy H3 stipulates a requirement for 33% affordable housing comprising a 60% social/affordable rent and 40% intermediate (shared ownership) tenure split. Based on the 70 units proposed, it would equate to 23 affordable units (14 rent & 9 shared ownership). We would expect to see a range of property types to ensure a range of housing needs were catered for. The affordable units should be delivered through a registered provider.

The need for smaller 1 and 2 bed units is echoed by the Home Options data shown below. The data shown below is based on those currently residing in Cheadle and does not include any adjoining parishes.

	A	B	B+	C	D	Grand Total
Bedroom need	1	34	2	54	30	121
1		12	1	18	19	50
2	1	6	1	17	9	34
3		11		13	1	25
4		4		6	1	11
5		1				1
Grand Total	1	34	2	54	30	121

The Developer Contributions Supplementary Planning Document (SPD) sets out the Council's expectations in terms of space standards, which seeks to achieve a higher space standard to ensure maximum flexibility in the lettings process.

Number of bedrooms/ bed spaces	1 storey dwelling	2 storey dwelling
1b2p	39sqm	
2b4p	70sqm	79sqm
3b5p	86sqm	93sqm

Policy H4 also states that affordable housing should be designed as an integral part of developments and be 'tenure blind' in relation to other properties within the site. There is an expectation that the affordable properties will be pepper potted across the site.

Should outline planning permission be approved then it would be subject to a section 106 legal agreement ensuring the delivery of affordable housing.

Design and Layout

The NPPF asserts that achieving well designed places is a key aspect of sustainable development, creating better places in which to live and work and helps make development acceptable to communities. Local plan Policy DC 1 seeks to reinforce these principles by ensuring that all development be well designed and reinforce local distinctiveness by positively contributing to and complementing to the special character and heritage of the area in line with the Council's Design Guide SPD.

The pre-application submission was accompanied by a high level landscape strategy plan which doesn't provide any detailing on the layout or design of the development. The pre-application planning report suggests that the application would be outline for up to 70 dwellings based on a 30 dwelling per hectare density.

Given the landscape sensitivity of the site, the landscape led approach is sensible to ensure existing habitats are protected and retained within the scheme. However, the LPA would want more reassurance that the site can accommodate the 70 dwellings and would expect the outline application to be accompanied by an indicative layout plan illustrating how the dwellings could be comfortably accommodated without compromising the existing landscape and habitat features.

In terms of basic urban design principles, a successful residential housing development should be outward facing, be permeable, with accessible points for pedestrian and cycles. Open space should be integral to the development, streets should incorporate street trees and be visually appealing through the use of different materials in the public domain. Car parking should not dominates the street scene and a range of parking solutions should be used to avoid front of plot parking which detracts from the appearance.

Housing types and mix should be varied in accordance with policy H1 previously outlined. Consideration should be given to providing some self-build plots within the development as there is a recognised need for these in Cheadle (2 plots in Cheadle and 3 plots in wider Cheadle). Housing should incorporate sustainable design and construction techniques and energy efficiency measures required by policy SD1.

Landscaping and Trees

As noted earlier in this pre-application response, landscape is a key design consideration in the evolution of the development proposals as the site is located within an area of high landscape sensitivity. The existing site has numerous landscape features which are evidently important visual and biodiversity/habitat features contributing to the character and quality of the local landscape. Any development proposals should aim to retain these existing features wherever appropriate.

The tree survey and tree constraints plan should be used to guide any layout design, seeking to demonstrate both avoidance of direct adverse impact on significant trees/hedges which should be retained, and suitable relationships between new development and tree crowns in order to achieve acceptable living environment for occupants without undue shading, overbearing, tree safety concerns etc which otherwise may generate pressure for premature felling/substantial reduction of trees.

The site's long boundary with Manifold Drive is formed by a simple post and wire fence, with intermittent established trees set back a few metres into the site. The main access point looks as though it can be accommodated without removal of trees or hedgerow. However, it is unclear how the southern housing parcel would be accessed, presumably by an internal link rather than its own separate access, and whether this would require tree or hedgerow removal.

The indicative development/landscape strategy plan suggests that the existing field pattern itself would be retained largely unaltered; however, the proposed development would quite obviously and substantially change the existing physical and visual landscape character of the site itself, from rural agricultural land to suburban residential estate development.

The pre-application enquiry has been accompanied by a Landscape and Visual Impact Assessment. The LVIA refers to aforementioned landscape evidence documents Landscape and Settlement Character Assessment (2008) and Staffordshire Moorlands Historical Environmental Character Assessment (2010) which note the special qualities of the landscape and its sensitivity. The LVIA establishes a 2km study area and Zone of Theoretical Visibility (ZTV) which includes public rights of way (Footpaths Cheadle 6 & 7) and open access land. 11 viewpoints have been identified including views from range of receptor points including localised views from Manifold Drive and from public footpaths.

The LVIA would need to be developed further in conjunction with any subsequent detailed design to wireline/photomontages from the viewpoints indicating the extent of the proposal site and the extent to which development would or wouldn't be in view.

The south-east boundary of the site does not follow existing field boundaries and has no existing physical demarcation, seemingly following an arbitrary "middle of the field" line. This boundary is, and would be – initially at least – completely visually open.

The landscape strategy plan indicates a proposed new hedgerow with trees along the south-east boundary. We would expect more substantial buffer planting (c. 10m) to be provided along this boundary, to provide screening of the development and to establish a definite and robust softening edge between urban and rural land to protect the character of the adjacent open countryside. Furthermore, new landscaping proposals should heavily rely on suitable and characteristic native species of trees, shrubs, grassland etc in order to be in keeping with the rural location and to support biodiversity net gain and enhancement objectives.

Ecology

An Ecological Assessment was submitted with the pre-application submission prepared by Rachel Hacking Ecology. The Assessment has been informed by an extended phase 1 habitat survey and three bat surveys. The report describes the site's main habitat features as being poor-semi improved grassland, which is of low ecological importance. The hedgerows of the site were identified as being species rich and qualifies as a priority habitat.

During the bat surveys seven species of bats were recorded mainly along the hedgerow running southwest to northeast. Aside from bats the main other species identified to be present was birds and hedgehogs. The report recommends that new habitats could be created on site including species rich hedgerows, wildflower grassland and SUDs features. Also the report suggests that longevity of the biodiversity and landscape features could be secured through the development being subject to a Construction Environment Management Plan (CEMP) and a Landscape and Ecology Management Plan (LEMP).

Biodiversity Net Gain has come into force and is now a mandatory requirement for all developments. The Environment Act requires a mandatory minimum of 10% biodiversity net gain to be delivered preferably on-site, or off-site and by biodiversity credits. Given the location of the site, we would expect the biodiversity net gain to be provided on-site. At the meeting it was discussed that there may be scope to include additional, as blue land (i.e. land within the same ownership), as additional land which could provide BNG, landscape and potentially recreational benefits.

The application would need to be accompanied by an up to date Ecological Assessment and a Biodiversity report and metric. Staffordshire Wildlife Trust would be consulted during the course of the application's determination to assess the ecological impacts of the scheme.

Highway implications

In accordance with local plan policy T1, we would need to understand the potential highway impacts of the proposal, and consider the site accessibility by alternative means of transport including walking and cycling.

Thank you for providing me with a copy of the pre-application response from Staffordshire County Council Highways department. The comments provide advice on the technical requirements for the access including visibility splays and advice for the preparation of a Transport Statement. They have also indicated that a Travel Plan may be required.

It is important that the application is accompanied by a comprehensive Transport Statement that assesses the accessibility of the site from a range of transport modes, highway impact and potential mitigation and sustainability measures. As discussed, transport impacts of the development are likely to be one of the prime objection grounds.

The Cheadle Town Centre Transport Study ³(and Phase 2 Assessment) identified improvements to address transport issues in the town based on levels of growth identified in the adopted Local Plan. Additional growth proposed by a site of this scale and its impact on town centre traffic should be considered.

³ [Cheadle Town Centre Transport Study](#)

The standards for residential car parking is 2 spaces for dwellings up to 3 bedrooms and 3 spaces for dwellings which are 4 bedrooms or more. Facilities for cycle parking should be provided for all residents.

Flood Risk and Drainage

The NPPF and local plan policy SD5 encourage development schemes to incorporate sustainable urban drainage (SUDs). The Landscape Strategy Plan indicates that swales could be provided along the site frontage with Manifold Drive. SUDs can have a dual purpose by assisting with the management of surface water drainage but can also be an attractive landscape feature if they are planted and less engineered.

As the site is over 1 hectare in size, a planning application should be accompanied by a Flood Risk Assessment. A draft FRA & drainage strategy was submitted with the pre-application response and was sent to the LLFA for comment.

The LLFA has advised that for either an outline or full application, the final point of outfall would need to be confirmed and they do not recommend conditional planning approval for sites where multiple drainage arrangements are proposed and a point of outfall must be demonstrated. They also recommend that the applicant undertakes BRE-365 Infiltration testing to determine whether a discharge can be made to ground. They advise further that:

- If infiltration is not suitable for a full discharge and a discharge to a watercourse is required, then additional investigation is required for the watercourse in the site as it is not clear where this discharges to and would need to be confirmed as a viable point of discharge with downstream connectivity away from the site.
- If a pumped solution is required, the applicant shall note that the current proposals are not in line with the SCC SuDS handbook (see local standard N).

The LLFA has also annotated the FRA & drainage strategy document and landscape strategy plans which I enclose.

Other Environmental Issues

The site is greenfield and is previously undeveloped and therefore the land is unlikely to have any contamination issues.

Environmental Health offers their own pre-application enquiry service which is subject to a separate fee arrangement

<https://myforms.staffs Moorlands.gov.uk/ENVHEALTHENQADVICE/launch>

Planning Obligations

Major residential developments tend to trigger the need for planning obligations and the developer contributions supplementary planning document provides detailed advice⁴. Matters likely to be secured in a section 106 legal agreement include: affordable housing, highway

⁴ https://www.staffs Moorlands.gov.uk/media/8288/Adopted-SM-SPD/pdf/sfAdopted_SM_SPD.pdf?m=1697720255497

improvements, contributions towards education and play/sports, on site landscape maintenance and potentially BNG.

With regards to education contributions, Staffordshire County Council has advised that they charge for pre-application advice but their website also includes details about how the education contribution is calculated and whether it is needed will be down to local school capacities.

<https://www.staffordshire.gov.uk/Education/Schoolsandcolleges/PlanningSchoolPlaces/Information-for-developers/Information-for-developers.aspx>

Our leisure team has provided advice on what the play and sports contributions would be sought for a 70 dwelling scheme (average 2.4 person occupation) gives a population increase of 168 people:

Capital contribution towards new 3G pitch - £8,232.00

Capital contribution towards swimming pool improvements - £34,921.00

Capital contribution towards sports hall improvements - £29,173.00

Maintenance costs towards 3G pitch - £257 per yr x 10 yrs = £2,570.00

Maintenance costs towards grass pitches - £1,978 per yr x 10 yrs = £19,780.00

Using our own off-site contributions:

Off-site contributions towards Parks & Gardens - 168 x £75.20 = £12,633.60

Off-site contributions towards Equipped Children's Play - 168 x £149.60 = £25,132.80
(depending on whether there would be a requirement for on-site play)

Off-site contributions towards Allotments - 168 x £38.20 = £6,417.60

Total - £138,860

The Highway Authority have also suggested that the site be subject to a Travel Plan which would need to be secured via a S106. I have also previously made reference to the Cheadle Town Centre Transport Study.

Planning Performance Agreement

As discussed at the meeting, SMDC does offer Planning Performance Agreements (PPAs) as a means of ensuring timely decision making. If you contact us again nearer the time of the application submission then we can commence the process and advise on the fee.

Engagement with Stakeholders

As advocated by the Staffordshire Moorlands Statement of Community Involvement (2016) we would always encourage pre-application engagement with the community and stakeholders in advance of submitting a planning application. Prior to submission we would recommend that you undertake a public consultation exercise which should include engagement with Cheadle Town Council and local ward councillors as well as local residents.

Validation requirements

It is understood that it is your intention to submit an outline planning application with all matters reserved except access. I have reviewed our validation list and would advise the following documents be submitted to support an outline planning application:

- Design and Access Statement – this is a key document of the application submission. It needs to explore the site constraints and opportunities of the site and its surroundings and explain the design evolution of the proposals.
- Landscape and Visual Impact Assessment (LVA) – this needs to feed into the design and access statement and should include photomontages from the identified viewpoints.
- Planning Statement which can also incorporate Affordable Housing Statement and Statement of Community Involvement and Planning Obligations: draft heads of terms
- Energy & Sustainability Statement – explore sustainability measures required by policy SD1.
- Arboricultural Impact Assessment
- Flood Risk Assessment & Drainage Strategy
- Ecological Appraisal & Biodiversity Net Gain Assessment
- Coal Mining report
- Transport Statement
- Site location plan
- Indicative layout plan
- Technical drawings relating to the access arrangements

The comments in this letter represent my professional opinion based on the information you have supplied and will not prejudice the decision on any future planning application which will be determined in accordance with the development plan and any other material considerations.

Yours sincerely



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Encl. LLFA