

Heaton s

Planning Environment Design

Our Ref: DEV-003-R

Your Ref: SMD/2026/0201

Date: 24th August 2026

Sent by email only to: Christopher.Johnston@StaffsMoorlands.gov.uk

Dear Chris,

RE: OUTLINE PLANNING APPLICATION, WITH ALL MATTERS RESERVED, EXCEPT FOR ACCESS, FOR THE ERECTION OF UP TO 55 DWELLINGS AT LAND OFF BREACH ROAD, BROWN EDGE, STAFFORDSHIRE

Introduction

This letter has been prepared to formally respond to the comments received to date from members of the public regarding the above application. It first summarises the letters of support and then goes on to provide a response to the objections received.

Support

The Application has received 9 letters of support from member of the public which have highlighted the following;

- The proposal will deliver much needed affordable and family housing.
- The site is well located given access to the local bus routes and pedestrian connectivity to shops.
- The site proposes a good access.
- The proposal will make good use of the land.
- Disagrees that the proposal will materially affect road safety.

Objection

The planning application has received objections which have been summarised and responded to below in green text. For ease, we have grouped the objections into appropriate categories.

Requirement for new homes and overdevelopment

Members of the public have stated that Brown Edge does not require any further housing, and comments have referred to a specific housing target being applicable for

Brown Edge.

Local Planning Authorities are required to maintain a supply of five years' worth of housing. The Council's latest published 5-Year Housing Land Supply (5YHLS) (interim position published April 2025) states that at 1st April 2023, the Council had a deliverable supply of 2.95 years which is a significant shortfall.

Thus, despite the local perception regarding housing requirement, there is an evidenced significant shortfall, and this planning application will assist in meeting the identified need.

Furthermore, there is not an adopted policy which provides a specific housing target applicable to Brown Edge.

Affordability

Concerns have been raised as to whether the houses will be affordable to the local community, noting that houses in the local area are a premium.

The development will deliver at least 50% of the dwellings as affordable homes. The Indicative Layout is for 55 dwellings and proposes at least 28 as affordable homes. This previously comprised a mix of social rented housing (17 dwellings), first homes (7 dwellings) and intermediate/starter homes (4 dwellings).

Following discussions with Staffordshire Moorlands, the proposed mix has been amended to 60% (17 dwellings) being delivered as social-rented and 40% (11 dwellings) as intermediate.

The social rented homes would be owned by the Local Authority or a registered provider and rented to people on low incomes. The rent is set in accordance with the Government's rent policy. Intermediate homes provide rental properties at a lower rate than the market price for those that don't qualify for social housing.

Loss of Green Belt

Objections have outlined that the proposal would result in the loss of Green Belt land and in particular would result in the loss of land between Brown Edge and Endon and impact openness.

The Application Site falls within the Green Belt. In December 2024, the Government introduced Grey Belt land which includes land that does not strongly contribute to the following Green Belt purposes;

- to check the unrestricted sprawl of large built-up areas
- to prevent neighbouring towns merging into one another

- to preserve the setting and special character of historic towns

In accordance with Policy GB7 (Development which is not inappropriate in the Green Belt) of the National Planning Policy Framework (NPPF) (2026), the development of homes in the Green Belt is not inappropriate if it would utilise green belt land and not fundamentally undermine the purposes of the remaining Green Belt across the plan area, there is demonstrable unmet need for housing, the development would be in a sustainable location and the 'Golden Rules' are met.

With regard to the Green Belt purposes, Planning Practice Guidance and Annex E of the NPPF (2026) is clear that those purposes do not relate to villages. As per Policy SS 8 of the Local Plan (September 2020), the Council considers Brown Edge to be a larger village. Furthermore, our Planning Statement and Green Belt Assessment has demonstrated that the proposed development would not fundamentally undermine the purposes of the remaining Green Belt across the plan area.

We have also demonstrated the proposal meets an identified need in a sustainable location and it meets the golden rules through provision of over 50% affordable housing, necessary improvements to local and national infrastructure and the provision of new green space.

Loss of countryside, greenfield sites and agricultural land

Members of the public have objected on the basis that the proposal will result in the loss of open countryside and agricultural land.

Given the lack of five-year housing land supply, there are no local or national planning policies which protect the countryside in this instance.

The planning system seeks to protect best and most versatile agricultural land which is defined as Grade 1 to Grade 3a land. The Application Site is however Grade 4 (poor quality), which is not protected.

Local Infrastructure

Members of the public have raised concerns that the development will increase pressure on local facilities, including shops and public transport and increase demand for schools and GP's. The responses also note that Brown Edge does not provide every service required for residents such as a pharmacy and concerns have also been raised in relation to additional pressures on gas and electricity.

The provision of new dwellings can increase pressure on local infrastructure. To address pressures, financial contributions can be sought through Section 106 Agreements. As part of the proposals, Heatons set out a draft Heads of Terms which include potential

financial contributions in relation to off-site open space, education and health care, alongside the payment of a monitoring fee.

With regard to education, Staffordshire County Council (SCC) have assessed the proposed development in line with Staffordshire's Education Infrastructure Contribution Policy. The Assessment highlighted that the development would generate 12 primary school pupils, 8 secondary school pupils and 2 Post 16 pupils. SCC have considered the planning areas for St Anne's CE (VC) Primary School, Endon Primary School, Endon High School and Endon & Moorside High. In assessing the pupil number on roll, net capacity and pupil modelling which includes committed developments and housing allocations, SCC have concluded that no education contribution is required.

The National Health Service Integrated Care Board has considered the impacts on primary care infrastructure and concluded that existing practices have the capacity to serve the development, and no financial contributions are therefore sought.

Staffordshire Moorlands Leisure Services have requested an annual contribution of £1,817 for natural and artificial grass pitches over a 10 year period resulting in a total contribution of £18,170.

Staffordshire County Council Highways have requested a £3000 sum for the monitoring of the Travel Plan.

We are in agreement to the requested monies and we will continue to work with all parties to address any matters relating to local infrastructure.

In addition to the above, the development will assist in supporting local infrastructure through the generation of monies via council tax.

Whilst it is noted not every service required to meet the day-to-day needs of residents is available within Brown Edge, there are substantial facilities and services available, and the settlement is accessible to the wider area via public transport.

With regard to matters relating to gas and electricity provision, we are not aware of any issues.

Ecology

Concerns have been raised in the respect of the loss of ecology/wildlife, including loss of hedgerows and green corridors and the lack of robust and clearly defined mitigation measures.

The proposals will not result in the loss of biodiversity. The proposed Indicative Layout

would deliver 15.01% net gain in habitat units, a 12.69% net gain in hedgerow units and a 525.29% net gain in watercourse units. This is achieved through providing an area of enhanced modified grassland to the north, the creation of modified and neutral grassland and through the provision of an attenuation pond.

Flooding and Drainage

Members of the public have raised issues in respect of water supply, water pressure and concerns relating to flooding and surface water drainage.

We are acutely aware of the issues, and our team are working closely alongside the Lead Local Flood Authority and Seven Trent Water to address those matters and an updated scheme will be submitted in due course.

Highways

In respect of highways, members of the public have raised issues with the access and its visibility, road safety (noting recent accidents and speeding issues), congestion, off-site parking pressures in the local area and construction traffic.

Staffordshire County Council Highway have reviewed the proposed scheme and have not raised any issues in respect of the above matters.

Concerns have been highlighted regarding the lack of pedestrian connectivity along Broad Lane which is used to connect to the local network of Public Rights of Way (PRoW).

The proposed development does not change the current accessibility to the PRoW network. Existing and future residents can access the PRoW network from Clay Lake to the east which benefits from a footpath and there are other points across the village which provides connections to the network.

Landscape and impacts of Character

Representations have highlighted that the proposal will cause 'damage to natural beauty' and loss of rural character and landscape. Noting the loss of gap between built-up areas.

Concerns have also been raised in terms of impacts on protected trees and landscape features.

A Landscape and Visual Appraisal has been prepared by Influence which concludes "*there are no significant impacts upon sensitive landscape and visual receptors due to the Proposals*".

Whilst matters relating to landscape are to be dealt with at reserved matters, the

indicative layout demonstrates a scheme could come forward which retains all features, apart from small sections of hedgerow to facilitate access points. The proposals will also include provision of new landscape features.

Residential Amenity

Neighbours have raised concerns that the development would result in the loss of privacy, natural light and create an overbearing impact. It has been noted that a buffer is required between the Application Site and Spring View to the west.

The Indicative Layout is for illustrative purposes only and the design will be finalised at Reserved Matters stage. However, we appreciate the concerns raised by the community and an amended Indicative Layout will be submitted in due course.

One objection has outlined there is no mechanism to safeguard residential amenity given the proposal is an outline application.

Both local and national planning policies require residential amenity to be protected, and these will need to be adhered to as part of the Reserved Matters application.

A further objection has noted there would be light spillage into their garden and rear facing rooms.

Whilst the proposed development will result in the emittance of light, light spillage associated with dwellings is minimal and would not cause harm to residential amenity.

Design

Matters relating to landscape and design have been raised. Notably, concerns have been raised that the proposed scale and design is not in-keeping with Brown Edge.

The planning application is seeking outline planning permission with all matters reserved except access. Therefore, matters relating to appearance, layout, scale and landscape will be dealt with at Reserved Matters stage.

An extension of up to 55 dwellings is in our view commensurate to the scale of the existing settlement.

Noise, vibration and Pollutions

Concerns have been raised that the development will result in an increase in noise, vibration and pollution. One objection has noted that the noise and pollution will conflict with the planning principles of safeguarding the health and quality of existing residents.

Environmental Health have reviewed the proposed development and raised no

objections subject to conditions which the Applicant is willing to accept. This includes a number of measures such as the provision of a Construction Environmental Management Plan.

Non-Material Considerations

The following points have been raised which are not material considerations in the planning system, thus should be given no weight in determining the application.

- Loss of view
- Loss of village status and identity
- Impact on property values
- Potholes on the adopted highway
- Setting a precedent, as all planning applications should be determined on their individual merits.
- Work has commenced. Please note, we can confirm that no work has commenced on site.

If trust the above will be taken into consideration and ease the publics concerns regarding the proposed development.

If you would like to discuss any matter raised in this letter, please do not hesitate to contact me.

Yous sincerely,

L. Stops

Laura Stops MTCP MRTPI