

Planning Statement

Outline planning application with all matters reserved,
except for access, for the erection of up to 55 dwellings

at

Land North of Breach Road, Brown Edge,
Staffordshire

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1 INTRODUCTION

1.1 Proposal

- 1.1.1 This Planning Statement (PS) has been prepared by Heatons on behalf of Debbie Evans ('the applicant') to accompany an outline planning application, with all matters reserved except for access, for the erection of up to 55 dwellings at Land north of Breach Road, Brown Edge, Staffordshire ('the Site').

1.2 Supporting Documents

- 1.2.1 This PS should be read in conjunction with the following drawings and documents:
- Site Location Plan (dwg. MMA-2543-01001-P4) (Matthew Montague Architects);
 - Block Plan (dwg. MMA-2543-01002-P15) (Matthew Montague Architects);
 - Artist Impression - Site Access (Matthew Montague Architects);
 - Artist Impression - North East Aspect (Matthew Montague Architects);
 - Artist Impression - North West Aspect (Matthew Montague Architects);
 - Artist Impression - Plot 6 to 11 and Balancing Pond (Matthew Montague Architects);
 - Design and Access Statement (Matthew Montague Architects);
 - Building for Life Assessment – within the DAS (Matthew Montague Architects);
 - Sustainability Statement (Heaton Planning);
 - Preliminary Ecological Appraisal (Heaton Ecology);
 - DEFRA Biodiversity Net Gain Report and Metric (Heaton Ecology);
 - Landscape and Visual Appraisal (Influence);
 - Grey Belt Assessment (Influence);
 - Arboricultural Key Facts Note (ACS Consulting);
 - Arboricultural Survey (Layout 1) (ACS Consulting);
 - Arboricultural Survey (Layout 2) (ACS Consulting);
 - Transport Assessment (Hub Transport Planning);
 - Phase 1 Geo-Environmental Report (ERDA Consulting); and
 - Flood Risk Assessment and Drainage Strategy (Link Engineering).

1.3 Pre Application Enquiry

- 1.3.1 A formal pre-application enquiry was undertaken with Staffordshire Moorlands District Council (SMDC) in August 2025. A formal response was received from SMDC on 4th September 2025 which confirmed, in the view of the Council, the following:
- The site could be regarded as a Grey Belt site and the development as proposed would be acceptable in principle;

- The site does not make a significant or strong contribution towards the five purposes of including land within the Green Belt;
- The development of the site as proposed would not fundamentally undermine the purpose of the Green Belt across the plan area as a whole and would comply with paragraph 155(a) of the NPPF;
- There is a current undersupply of housing within the District (2.95 years supply) and therefore the proposal would comply with paragraph 155 (b) of the NPPF;
- The site immediately adjoins the settlement edge of Brown Edge, a sustainable 'large village' and therefore the proposal would comply with paragraph 155 (c) of the NPPF; and
- The site is not located within an area identified within the Local Plan Landscape Assessment as 'providing an important landscape setting' to Brown Edge.

1.3.2 A copy of the formal response provide by SMDC is attached as **Appendix A**.

1.3.3 During the preparation of this planning application, the proposed Plans were shared with Brown Edge Parish Council and we subsequently attended two Parish Council meetings on 18th May 2026 and 29th June 2026. As the planning application progresses, we welcome engagement with all interested parties.

2 SITE CONTEXT & PLANNING HISTORY

2.1 The Site and Surrounding Area

- 2.1.1 The site covers an area of approximately 3.2ha and is located on the eastern edge of the village of Brown Edge, outside of, but immediately adjacent to the settlement boundary. The site is greenfield, currently used for sheep/horse grazing and classified as Grade 4 (Poor) agricultural land.
- 2.1.2 Access to the site is currently taken from a gated access from the B5051 Breach Road at the south-eastern corner of the site. This provides access to the applicant's wider land holding and associated agricultural buildings to the north and east which will be retained.
- 2.1.3 A Public Right of Way (PRoW), Brown Edge 70, runs in an east to west direction approximately 430m to the north of the built development area within the site linking Broad Lane with Hough Hill and the wider PRoW network around Brown Edge. This PRoW borders land within the ownership of the applicant. A further PRoW, Endon and Stanley 12, lies immediately to the south of the site, on the opposite side of Breach Road and also links to the wider footpath network around Brown Edge.
- 2.1.4 The site is bordered to the north and east by agricultural land. There lie some dispersed residential and commercial properties to the south on Breach Road including Breach Farm, Rock Cottage Care Home and Rock Cottage Day Nursery. Immediately to the west and south-west of the site lie residential properties of varying ages and styles which form the eastern edge of Brown Edge village.
- 2.1.5 The village of Brown Edge provides a number of day-to-day amenities including a primary school, day nursey, village hall, three churches, post office, a Morrison's Daily convenience store, pub, bakery, garage and a park/play area. The 8A bus serves Brown Edge with stops located to the south of the site on Breach Road. The 8A provides hourly services 6-days a week to Hanley (Bus Station) and Endon via Northwood, Sneyd Green, Smallthorne, Ford Green, Norton in the Moors and Norton Green. Onward bus services can be accessed from both Hanley Bus Station and from Endon into Leek.
- 2.1.6 The site lies within the Staffordshire Green Belt but is not covered by any other statutory or non-statutory landscape or ecological designations. There is a group Tree Preservation Order (TPO No.4 1976) which dissects through the northern part of the site, and is part of the natural border between the built developed land and BNG land. There are no veteran trees on the site.

- 2.1.7 The site is not located within a Conservation Area and does not contain any listed buildings. The nearest listed building, the Grade II listed Clays Farmhouse, is located approximately 300m to the east of the south-eastern site boundary. The site is located within Flood Zone 1 which represents a low risk from flooding. There is a risk from surface water flooding along the southern part of the site.
- 2.1.8 The site is shown in context on the aerial photo set out in Figure 1 below.

Figure 1: Illustrative Site Location



Source: Google Maps

2.2 Planning History

- 2.2.1 A review of planning history on SMDC's online planning portal does not identify any planning history relating to the site which is relevant to this proposal.
- 2.2.2 The site was included within the Strategic Housing Land Availability Assessment (SHLAA) July 2015 under site references BE032 and BE032a. The SHLAA reported that the site is "well located in sustainability terms" and potentially suitable for development, being "well located to shops and services in village, unlikely to be access constraints, relatively flat, no landscape constraints". A key constraint highlighted within the SHLAA was the site's Green Belt status, and whilst there would be some visual intrusion this would not be "as much as some other sites".

- 2.2.3 A large portion of the site was considered within the Green Belt Review (November 2015) which forms part of the evidence base for the adopted Local Plan. The westernmost part of the site was not available for development at the time of the Review and was therefore not included within the assessment. The Green Belt Review considered the site for release from the Green Belt under exceptional circumstances; and the Review confirms that the land is not an important part of the landscape setting of the village.

3 THE PROPOSAL

3.1 Description of Proposed Development

- 3.1.1 The proposal is for outline planning permission for up to 55 dwellings with all matters reserved except access. Matters relating to appearance, landscape, layout and scale will be dealt with as part of subsequent reserved matters applications.
- 3.1.2 To demonstrate how the site could deliver up to 55 dwellings, a Block Plan has been prepared by Matthew Montague Architects. The plan is for illustrative purposes only.
- 3.1.3 The illustrative Block Plan includes a single point of access off Breach Road to the south. The primary road runs in a northerly direction with two secondary roads spurring off to the west. The Applicant's existing access will be closed and a single track will be created to the north to connect the primary road with the Applicant's existing track to the northeast. 1 no. tree is required to be removed to create the access track. The tree is not covered by the TPO.
- 3.1.4 The proposal incorporates an indicative mix of house types and tenures to meet the needs of the local community. The indicative mix includes 27 open market homes, and 28 affordable homes. The affordable homes would be split 60% social rented housing (17 dwellings) and 40% intermediate homes (11 dwellings).
- 3.1.5 The scheme includes a mix of two storey dwellings and a two-storey apartment block.
- 3.1.6 The different house types and tenures will be mixed throughout the site to provide an interesting street scene and ensure all affordable dwellings are tenure blind. Sufficient car parking, bin storage and amenity space is proposed for each plot. The dwellings have been positioned to protect residential amenity.
- 3.1.7 The apartment block is proposed to the south of the site to overlook the attenuation pond and a small car park is proposed to the rear which includes bikes and bin storage.
- 3.1.8 As shown on the illustrative drawings, there is potential to bring forward a high-quality scheme which reflects its location on the edge of Brown Edge.
- 3.1.9 With regard to green infrastructure, with the exception of removing a small section of hedgerow to provide the sites access and the removal of a tree to create the northern access track, existing trees and hedgerows are proposed to be retained and integrated within the proposals. Whilst landscaping is to be dealt with at reserved

matters, as shown on the illustrative Block Plan, there is potential to integrate new landscaping throughout the built development. As shown on MMA-2543-01002-P15, the attenuation pond creates an opportunity for an attractive area of open space to be delivered to the south of the site with the provision of a Local Area of Play (LAP).

- 3.1.10 The site's drainage strategy requires a pumping station on site due to level constraints. The pumping station needs to be positioned to the south of the site, with vehicular access and an offset from residential properties of at least 15m. To achieve this, a pumping station has been indicatively sited to the south of the site and will be screened by existing and proposed landscaping.

4 S106 DRAFT HEADS OF TERMS

- 4.1.1 The following Section 106 contributions are anticipated from the proposed development:

4.2 Affordable Housing

- 4.2.1 Provision of at least 50% on site affordable housing, split 60% social rented housing and 40% intermediate homes. Locations, un-clustered, are to be agreed with SMDC. No more than 50% of the open market dwellings would be occupied until all of the affordable housing has been constructed and transferred to a registered provider.

4.3 Playing Field Contribution

- 4.3.1 Provision of £1,604 per annum for natural grass pitches and £213 per annum for artificial grass pitches over a 10 year period.

4.4 Travel Plan

- 4.4.1 Provision of £3,000 for monitoring of Travel Plan.

4.5 Monitoring Fee

- 4.5.1 Payment of a monitoring fee (£tba) to SMDC towards the costs of monitoring the planning obligations contained within the resultant S106.

5 Policy Context

5.1 Introduction

- 5.1.1 Section 38(6) of the 2004 Planning and Compulsory Purchase Act requires that planning applications be determined in accordance with the development plan, unless material considerations indicate otherwise. The relevant development plan for Staffordshire Moorlands comprises the Staffordshire Moorlands Local Plan (2020).
- 5.1.2 The National Planning Policy Framework (NPPF) which was first published March 2012 and last updated in August 2026 is a key material consideration. Other relevant material considerations include the Staffordshire Moorlands Design Guide SPD (2018) and Staffordshire Moorlands Developer Contributions SPD (2023).

5.2 Staffordshire Moorland Local Plan (2020)

- 5.2.1 The Staffordshire Moorlands Local Plan (SMLP) was adopted in September 2020 and sets out the Council's vision and strategy for the District for the period 2014 to 2033.
- 5.2.2 **Policy SS1: Development Principles** sets out that 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 a mix of types and tenures of quality, affordable homes, to meet the needs and aspirations of existing and future communities; quality local services; easy access to jobs, shops and transport services; increased economic prosperity and opportunities; a healthy, safe, attractive, active, well designed and well maintained environment; maintain locally distinctive character; protect and enhance the natural and historic environment; and efficient and effective use of resources.
- 5.2.3 **Policy SS2: Settlement Hierarchy** defines four levels of settlement hierarchy, these being: towns, rural area larger villages, rural area smaller villages and other rural areas. Brown Edge is identified within the rural area larger villages classification; which are the most sustainable settlements in the rural areas which generally have good local social infrastructure, some local employment opportunities and good accessibility to the towns and larger centres. The spatial strategy focuses the bulk of the rural development in these settlements.
- 5.2.4 **Policy SS3: Future Provision and Distribution of Development** outlines that provision will be made for at least 6,080 additional dwellings to be completed during the period 2014 to 2033; an annual average of 320 homes per year. 25% of this

housing target is to be delivered in rural areas. The policy calculates the net housing requirement for between 2019 and 2033 as 3,763 dwellings.

- 5.2.5 **Policy SS4: Strategic Housing and Employment Land Supply** sets out that in order to meet the housing requirements, sufficient land will be identified to accommodate at least 3,763 dwellings (25% of which in rural areas, this being 698 dwellings). The policy also sets out the minimum net housing requirement between 2019 and 2033 for Brown Edge Parish to be 20 dwellings.
- 5.2.6 **Policy SS8: Larger Villages Areas Strategy** confirms Brown Edge as a larger village, which shall retain and enhance its role as rural service centres, providing the bulk of housing requirement of the rural areas.
- 5.2.7 **Policy SS10: Other Rural Areas Strategy** outlines that other rural areas comprise the countryside and the Green Belt outside of the development boundaries. The policy sets out that these areas will provide only for development which has an essential need to be located in the countryside, supports rural diversification, promotes sustainable tourism or enhances the countryside. Nevertheless, the policy allows for rural exceptions housing.
- 5.2.8 **Policy SS12: Planning Obligations and Community Infrastructure Levy** seeks development proposals to provide, or meet reasonable costs of providing, the on-site and off-site infrastructure, facilities and mitigation necessary through the appropriate use of planning obligations and/or conditions.
- 5.2.9 **Policy SD1: Sustainable Use of Resources** outlines that the Council will require all development to make sustainable use of resources and adapt to climate change. It also sets out a preference to utilise lower quality over higher quality agricultural land for development.
- 5.2.10 **Policy SD3: Sustainable Measures in Development** sets out that the Council will support further carbon-saving or water-saving measures in both new and existing developments.
- 5.2.11 **Policy SD4: Pollution and Water Quality** seeks for proposals to avoid potential adverse effects and will only permit proposals that are deemed to result in pollution if after mitigation, potential adverse effects are deemed acceptable.
- 5.2.12 **Policy SD5: Flood Risk** sets out that the Council will follow a sequential approach to the management of flood risk; with new development guided to the areas of the lowest risk of current and future flooding where this is viable and compatible with other policies aimed at achieving a sustainable pattern of development.

- 5.2.13 **Policy H1: New Housing Development** outlines that 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 H3. Where a demand exists for self-build/custom-build, residential developments of 10 dwellings or more will make an appropriate contribution towards this need in agreement with the Council and will be negotiated on a case-by-case basis.
- 5.2.14 **Policy H3: Affordable Housing** requires residential developments of 10 or more dwellings to provide 33% affordable housing. Unless circumstances dictate otherwise and in agreement with the Council, 60% of all affordable dwellings will be social/affordable rented housing with the remaining 40% being intermediate/starter homes. In or on the edge of villages, affordable housing schemes that are of an appropriate scale will be permitted on suitable rural exceptions sites which are well related to services and facilities and where a demonstrable need existing within the local area which cannot otherwise be met.
- 5.2.15 **Policy DC1: Design Considerations** sets out 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. New development should be of high quality; respect the site and its surroundings; create attractive, active, functional, accessible and safe environments; incorporate sustainable construction techniques; protect the amenity of the area; maintain, enhance and restore biodiversity and geological heritage; provide safe access and contribute to necessary parking requirement; well-integrated for all users; ensure infrastructure capacity is available or enhanced to enable the development; provides quality of access for all of the community; and is served by high speed broadband.
- 5.2.16 **Policy DC3: Landscape and Settlement Setting** states that the Council will protect and where possible enhance local landscape and the setting of settlements by resisting development which would lead to a prominent intrusion into the countryside or have a significant adverse impact on the character or setting of a settlement; support development which respects and enhances local landscape character; and support development which respects and enhances biodiversity.
- 5.2.17 **Policy C1: Creating Sustainable Communities** sets out that the Council will seek to create sustainable communities at a local level by supporting proposals which protect, retain or enhance existing community facilities or provide new facilities.

- 5.2.18 **Policy C2: Sport, Recreation and Open Space** outlines that the Council will promote the provision of high quality recreational open space. Residential developments of 10 dwellings or more will be expected to make provision, or a contribution towards provision of open space, sports and recreation facilities which are necessary and reasonably related in form and scale. The quantity standards (ha per 1,000 population) from the Open Space Study are as follows: 0.14ha parks and gardens; 0.60 ha amenity greenspace; 0.10ha allotment; and 0.08ha provision for children and young people. Further guidance is set out in the Developer Contributions SPD.
- 5.2.19 **Policy NE1: Biodiversity and Geological Resources** requires the biodiversity and geological resources of the District to be conserved and enhanced by positive management and strict control of development.
- 5.2.20 **Policy NE2: Trees, Woodland and Hedgerows** sets out that the Council will protect existing trees, woodlands and hedgerows by requiring that existing woodlands, healthy trees and hedgerows are retained and integrated within a proposed development; requiring new developments to provide tree cover that secures a good level of sustainability; and resisting development that would directly or indirectly damage existing ancient woodland, veteran trees and ancient or species rich hedgerows.
- 5.2.21 **Policy T1: Development and Sustainable Transport** outlines that the Council will promote and support development which reduces reliance on the private car and reduce the need to travel generally.

5.3 National Planning Policy Framework (NPPF) (August 2026)

- 5.3.1 The National Planning Policy Framework was first published in March 2012, the most recent update was published in August 2026. The NPPF sets out the Government's planning policies.
- 5.3.2 Paragraphs 15 and 16 outline that the purpose of the planning system is to contribute to the achievement of sustainable development. Which is summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.
- 5.3.3 There are three overarching sustainability objectives which are interdependent and need to be pursued in mutually supportive ways. The objectives are as follows;
- "An economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and*

at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

A social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful land safe places, with accessible community facilities, public service infrastructure and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and

An environmental objective – to support efforts to mitigate and adapt to climate change, including moving to a low carbon economy; and to protect and enhance our natural, built and historic environment, including making effective use of land, improving biodiversity, using natural resources prudently, and minimising waste and pollution.”

- 5.3.4 **Policy DM1 (Preparing development proposals)** states that proposals should be informed by early engagement with interested parties and pre-application engagement should be proportionate to the nature of the proposal. It also details that major applications should be supported by a Planning statement which details how the development proposal complies with the Development Plan and national decision-making policies, the outcome of pre-application engagement and the proposed use of any planning obligation to make the proposal acceptable in planning terms.
- 5.3.5 **Policy DM3 (Determining development proposals)** sets out 6 criterion on how development proposals should be determined. This includes but not limited to requiring local planning authorities to work with applicants in a positive and proactive manner which includes seeking solutions where problems arise to enable a timely decision. Local planning authorities should consider where development can be made acceptable through the use of planning conditions and obligations and no development should be refused if it should be approved having regard to the development plan, policies in the NPPF and other material conditions.
- 5.3.6 **Policy DM6 (Use of planning conditions and obligations)** states that planning conditions should only be attached to planning permissions where they are necessary to make the development acceptable, relevant to the development and are a planning consideration which is precise, capable of being enforced and reasonable in all other aspects. Notably, point 3 of the policy states that “conditions

that are required to be discharged before development commences should be avoided, unless there is a clear justification.”

- 5.3.7 **Policy S3 (Presumption in favour of sustainable development)** details that a presumption in favour of sustainable development should apply which includes applying Policy S5 for proposals outside of settlements and in all locations, development proposals that accord with both an up-to-date development plan and the decision-making policies in this Framework should be approved without delay.
- 5.3.8 **Policy S5 (Principle of development outside settlements)** allows certain forms of development outside of settlements unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in the NPPF.
- 5.3.9 Criterion j allows development which would address an evidenced unmet need where it's physically well-related to an existing settlement and of a scale which can be accommodated, taking into account the existing or proposed availability of infrastructure. Paragraph 5 is clear that the policy does not apply to development proposals in the Green Belt. However, where development would not be inappropriate in the location, proposals should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in this Framework, and applying paragraph 2 of the policy. Paragraph 2 states *“the circumstances in which the benefits of approving development proposals are likely to be substantially outweighed by adverse effects include, but are not restricted to, situations where the development proposal would fail to comply with one of the national decision-making policies which state that development proposals should be refused in specific circumstances.”*
- 5.3.10 **Policy CC2 (Mitigation of climate change)** states proposals should ensure sustainable patterns of movement, limit the need to travel, use design approaches which conserve energy and other resources, take advantage of opportunities to reuse existing structures and materials, take advantage of opportunities to draw low carbon energy from decentralised networks and contribute to the creation and restoration of habitats.
- 5.3.11 **Policy CC3 (Adaption to climate change)** states proposal should take into account current and potential impact of climate change over the lifetime of the scheme. This can be achieved by locating development where risk of flooding is minimised, incorporate sustainable drainage systems, utilise design approaches to minimise

overheating and propose tree planting and incorporate proportionate measures to mitigate against wildfires.

- 5.3.12 **Policy HO7 (Meeting the need for homes)** outlines that substantial weight should be given to the benefit of providing homes which contribute towards meeting the evidenced accommodation needs of the community, as identified through needs assessments.
- 5.3.13 **Policy HO8 (Providing affordable homes)** states that development proposals should meet or exceed up-to-date development plan requirements for the proportion and mix of affordable housing tenures. Paragraph 3 states *“Where development proposals meet or exceed up-to-date development plan requirements for the proportion and mix of affordable housing tenures, including the minimum proportion of Social Rent properties, a flexible approach should be taken to the application of any development plan requirements relating to the number of bedrooms provided in market homes, taking into account prevailing market conditions.”*
- 5.3.14 **Policy L3 (Achieving appropriate densities)** outlines that proposals should make efficient use of land taking into account identified need, local market conditions and availability of infrastructure and its scope for improvement. Part b of paragraph 2 notes that outside settlement development footprints, proposals should make the best use of the site’s development potential.
- 5.3.15 **Policy GB2 (Assessing existing Green Belt land)** sets out the five purposes of the Green Belt which are;
- a. Check the unrestricted sprawl of large built-up areas;*
 - b. Prevent neighbouring towns merging into one another;*
 - c. Assist in safeguarding the countryside from encroachment;*
 - d. Preserve the setting and special character of historic towns; and*
 - e. Assist urban regeneration by encouraging the recycling of derelict and other urban land.*
- 5.3.16 **Policy GB6 (Control of development in the Green Belt)** states that development is inappropriate in the Green Belt unless it falls within a category outlined in policy GB7.
- 5.3.17 **Policy GB7 (Development which is not inappropriate in the Green Belt)** details developments which are not inappropriate in the Green Belt and therefore should not be regarded as harmful to the Green Belt. Criteria g includes development where it would utilise grey belt land, not fundamentally undermine the purposes (take together) of the remaining Green Belt across the plan area, there is an evidenced unmet need, the Application Site is in a sustainable location and complies with Policy GB8.

- 5.3.18 **Policy GB8 (The Golden Rules)** details that grey belt sites must meet all the ‘golden rules’. Paragraph a requires affordable housing which either reflects policy HO5(1)(a)(ii)), a contribution which is 15% higher than existing requirements (subject to a 50% cap) or a 50% contribution. Paragraph b requires necessary improvements to local or national infrastructure and paragraph c requires the provision of new green space or improvements to existing green space.
- 5.3.19 Paragraph 2 clearly outlines that substantial weight should be given to compliance with the ‘golden rules’.
- 5.3.20 **Policy DP3 (Key principles for well-design places)** states proposals should respond to their context and should accord to a number of principles relating to liveability, climate, nature, movement, built form, public space and identity.
- 5.3.21 **Policy TR3 (Locating development in sustainable locations)** seeks to direct development which will generate significant amounts of movement to locations that are sustainable and proposals should seek opportunities to utilise existing and proposed transport infrastructure. Paragraph c states that “any significant adverse impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, should be mitigated to an acceptable degree using a vision-led approach”. Paragraph d requires proposals to take into account the environmental impacts of traffic.
- 5.3.22 Paragraph 2 outlines that the Connectivity Tool should be used alongside other data to assess connectivity of sites.
- 5.3.23 **Policy TR4 (Street design, access and parking)** outlines that to create a well-designed place, transport considerations are integral. This includes giving priority to walking, wheeling and cycling, ensuring routes are safe, inclusive and attractive for all users and sufficient car parking is provided.
- 5.3.24 **Policy TR6 (Assessing Transport Impacts)** state that development proposals that are likely to generate significant movements should be support by a Transport Statement and Travel Plan. Paragraph 4 is clear that development proposals should be refused if development would have a severe adverse impact on the transport network or an unacceptable impact on highway safety.
- 5.3.25 **Policy P2 (Ground Conditions)** requires sites to be suitable for their proposed use taking into account ground conditions and potential mitigation measures.
- 5.3.26 **Policy P3 (Living conditions and pollution)** sets out a detailed policy to protect the amenity of existing and future occupiers.

- 5.3.27 **Policy F4 (Assessing flood risk for decision-making)** requires a site-specific flood risk assessment for sites in Flood Zone 1 where the site extends 1 hectare or more. Paragraph 2 details that a sequential tests is not required where *“the site would be at risk of surface water flooding only, the proposed layout, design, and mitigation measures would ensure that occupiers and users would remain safe from current and future surface water flood risk for the lifetime of the development without increasing flood risk elsewhere in accordance with policy F7.”*
- 5.3.28 **Policy E7 (Ensuring development is safe from flooding)** states *“development proposals should not present a risk from flooding to potential occupiers, users, or visitors, and should not increase flood risk elsewhere.”* Paragraph 2 outlines that development should be refused if it is proposed in a location known to be at risk of flooding unless;
- “a. Within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons which justify a different arrangement;*
 - b. The development will be safe throughout its lifetime taking account of the vulnerability of its users;*
 - c. Any residual risk can be safely managed, and safe access and escape routes are included where appropriate, as part of an agreed emergency plan;*
 - d. The development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment; and*
 - e. It can be demonstrated that flood risk will not be increased elsewhere.”*
- 5.3.29 **Policy F8 (Sustainable drainage systems and watercourses)** requires development which could affect drainage to incorporate sustainable drainage systems to control flow rates and reduce volumes of runoff.
- 5.3.30 **Policy N2 (Improving the natural environment)** details that proposals should contribute positively to the natural environment. It sets out a criteria which includes but not limited to taking in account the quality of agricultural land, strengthening ecological networks, conserving and enhancing nature features, utilising green infrastructure and minimising adverse impacts on biodiversity. Paragraph 2 states that if significant harm to biodiversity resulting from a development cannot be avoided, mitigated or compensated for, the development should be refused.
- 5.3.31 **Policy N3 (Trees in new development)** requires new streets to be tree lined unless there are strong reasons for not doing so, along with incorporating trees in other appropriate locations. The species, location and on-going maintenance of trees should be given due consideration.

- 5.3.32 Annex B defines grey belt as *“land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in policy GB2.”*
- 5.3.33 Annex E provides further details on how Green Belt land should be assessed. With regards to how the land contributes to purposes A, B, D, the NPPF is clear that this does not apply to villages.

5.4 Staffordshire Moorlands Design Guide SPD (2018)

- 5.4.1 The Staffordshire Moorlands Design Guide Supplementary Planning Document (SPD) was adopted in February 2018 and should be applied with regard to the latest NPPF, in particular Chapter 12 – Achieving well-designed places.
- 5.4.2 The SPD sets out that the architectural style of new development should be guided through an assessment and understanding of the character and context of the area; and should respond to local tradition without intensively copying it. New development should respect the scale, materials, proportions, form and details of the local area and neighbouring buildings.
- 5.4.3 The SPD promotes the aim of zero carbon emissions and sustainable design principles can be achieved through locating development where there is good access to public transport; maximising solar gain through south facing elevations; minimising heat loss by limiting openings to the north; avoiding exposed sites; maximising trees but avoiding overshadowing the south elevation; and aligning buildings with the contours to avoid artificial mounding or wasteful under building.
- 5.4.4 The SPD outlines that developments which have high amenity value and pleasant and agreeable; retaining high amenity without sacrificing density. Good urban design is characterised by strong local identity; well positioned trees and landscape features; high levels of personal privacy within houses; appropriate lighting; and safe and accessible environments.
- 5.4.5 Good landscaping greatly enhances the setting and appearance of buildings; and a mixture of appropriate hard landscaping, soft landscaping and wildlife should be implemented. All development proposals are expected to conserve existing wildlife interest as far as possible and consideration should be given to enhancing/creating new opportunities for wildlife.

5.5 Staffordshire Moorlands Developer Contributions SPD (2023)

- 5.5.1 The Developer Contributions SPD was adopted in October 2023 and sets out details regarding SMDC's approach to planning obligations and the types of contributions that will be required.
- 5.5.2 The SPD introduces that developer contributions will be negotiated on a site-by-site basis; taking account the individual characteristics of the site, as well as the availability of, quality of and impact on infrastructure.
- 5.5.3 The SPD outlines that all financial contributions contained in a S106 should be index linked from the Committee approval date to the trigger date when the contribution payment is due to ensure the real value of developer contributions is maintained up to the date of payment.
- 5.5.4 The SPD sets out that financial contributions are payable at specific stages in the development process, which are known as trigger points. The monitoring fee is paid for every obligation trigger in the Section 106 agreement; based on the occurrence of triggers for compliance of planning obligations (rather than each obligation individually). The fee will be index linked and periodically reviewed to ensure the administrative costs associated with monitoring and managing developer contributions are covered by the fee.
- 5.5.5 The Council's overall approach to affordable housing is set out in Local Plan Policy H3 (Affordable Housing) which states that residential developments of 10 dwellings (or 0.5 ha) or more shall provide 33% affordable housing. For this application, an affordable housing provision of 50% affordable housing is proposed in line the golden rules of Grey Belt applications. The SPD seeks 60% of affordable housing to be social/affordable rented; 25% of affordable housing to be First Homes and the remaining 15% to be intermediate/starter homes.
- 5.5.6 The SPD outlines that residential development of 10 or more dwellings (or of 0.5 ha or more) will be expected to make provision or a contribution towards open space, sports and recreation facilities. Unless agreed otherwise with the Council, open space will be provided on site. If agreed, off-site provision of part or all the requirements will be provided by means of a commuted sum to the Council based on a monetary figure per dwelling. The basis for calculating the level of developer contribution required is set out in Figure 2, setting out how much open space provision (in hectares per 1,000 people) is needed to strategically serve the Staffordshire Moorlands plan area in the future. This assumes the local average occupancy figure of 2.3 per dwelling.

Nature of open space	Provision required in hectares per 1,000 population	Standard per new dwelling m ²	Cost per m ² *	Contribution per dwelling
Amenity Greenspace	0.6	14	To be provided on site by the developer.	
Equipped children's play	0.08	1.8	a) to be provided on site by the developer or	
			b) £83.10	Off-site contribution £149.60
Allotments	0.1	2.3	a) to be provided on site by the developer or	
			b) £16.60	Off-site contribution £38.20
Parks and Gardens	0.14	3.2	£23.50	£75.20

Figure 2: SPD open space requirements

Source: Staffordshire Moorlands Developer Contributions SPD (2023)

*January 2023 costs subject to indexation

- 5.5.7 The above sets out a new dwelling requirement of 14m² of amenity greenspace, 1.8m² of children's play, 2.3m² of allotments and 3.2m² for parks and gardens to be delivered, unless off-site contributions were paid as an alternative.
- 5.5.8 The SPD states that contributions towards playing pitches and outdoor sports facilities will be sought from residential developments of 10 or more dwellings (or of 0.5 ha or more); and will be considered on a case-by-case basis.
- 5.5.9 The SPD highlights the requirement to protect and enhance biodiversity and green infrastructure; and the aim to secure 10% Biodiversity Net Gain. It is expected that biodiversity and green infrastructure enhancements will generally be secured through planning conditions.
- 5.5.10 The SPD sets out that housing development can add to the demand for health care and therefore reasonable levels of developer contributions are required towards the capacity and resilience of health facilities.

- 5.5.11 The SPD also outlines that Section 106 contributions are vital for education provision; as the provision of school places must be considered alongside the delivery of new homes.

6 PLANNING ASSESSMENT

6.1 Principle of Development

- 6.1.1 The site is situated in the Green Belt. Policy GB7 (Development which is not inappropriate in the Green Belt) of the NPPF (2026) states that residential development in the Green Belt is not inappropriate development if the scheme would utilise grey belt land, not fundamentally undermine the purposes of the remaining Green Belt, there is a demonstrable unmet need for housing, the site is in a sustainable location and the Golden Rules are met. Each of these points are addressed in turn in the proceeding section.

6.2 Grey Belt

- 6.2.1 The site is Grey Belt land in accordance with the NPPF Glossary (Annex B) as it does not strongly contribute to purposes a, b and d of the Green Belt purposes set out in Policy GB2 of the NPPF (2026). Furthermore, the proposal would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the Staffordshire Moorlands Plan area. Influence have prepared a Grey Belt Assessment (Ref: INF_N251349_R02) which should be read alongside this Planning Statement.
- 6.2.2 With regard to checking unrestricted sprawl of large built up areas. Paragraph 005 of Planning Practice Guidance and Annex E of the NPPF (2026) is clear that villages should not be considered large built up areas. Therefore, the land provides no contribution to Green Belt purpose A as Brown Edge is a village, not a large built up area. In any event, it's a logical extension to Brown Edge and will not extend the built form of the Settlement further west given the existing development on the opposite side of Breach Road. The site is well contained by existing landscape features which will be enhanced further as part of the development proposals.
- 6.2.3 Turning to Green Belt purpose B, the NPPF (2026) and Planning Practice Guidance states that it only relates to the merging of towns and not villages. Thus, the sites contribution to the purpose is none.
- 6.2.4 Brown Edge is not a historic town and thus the proposal would not have any adverse impacts on the setting or special character of any historic town and there would be no significant impact on any features of historic importance. The site therefore makes no contribution to purpose D.
- 6.2.5 Finally, the proposal would not fundamentally undermine the purposes, taken together, of the remaining Green Belt across Staffordshire Moorlands. The

Assessment prepared by Influence concludes that *“the development of the site does not compromise the integrity of the wider Green Belt parcel: there is no opportunity for unrestricted sprawl due to the site boundaries, and the development will be experienced visually as part of the existing settlement edge, having no impact on the clearly legible gap between Stoke on Trent and Leek, or even Baddeley Edge and Leek.”*

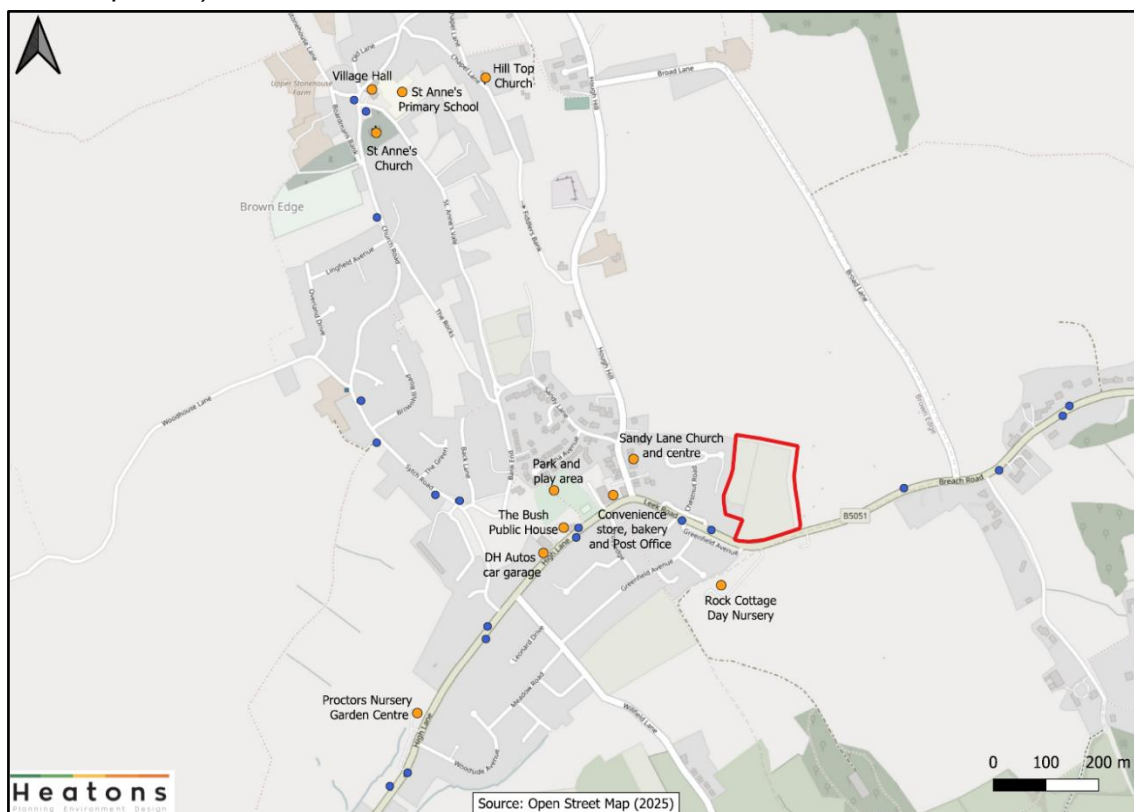
6.3 Unmet Housing Need

- 6.3.1 With regard to the requirement to demonstrate an unmet need, 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.

6.4 Sustainable Location

- 6.4.1 In respect of the sustainability of the site’s location, the village of Brown Edge contains a wide range of day-to-day services as set out within Section 2 of this Statement. This includes a primary school, day nursery, village hall, three churches, post office, a Morrison’s daily convenience store, pub, bakery, vehicle repair garage and a park/play area.
- 6.4.2 These amenities are visualised in Figure 3, in particular demonstrating the site’s proximity to the day nursery, church, convenience store, bakery, post office, pub, car garage and play area; all of which within a 5-minute walking distance of the site.

Figure 3: Brown Edge day to day services (red line showing extent of proposed built development)



- 6.4.3 Figure 3 also demonstrates the abundance of bus stops within the settlement of Brown Edge, the closest bus stops located along Breach Road, approximately 50 metres southwest of the site, served by the number 8A bus in both directions. The 8A provides hourly services 6-days a week to Hanley (Bus Station) and Endon via Northwood, Sneyd Green, Smallthorne, Ford Green, Norton in the Moors and Norton Green. Onward bus services can be accessed from both Hanley Bus Station and from Endon into Leek.
- 6.4.4 The village of Brown Edge is identified within the adopted Local Plan as an area able to accommodate growth. Brown Edge is identified within the rural area larger villages classification; which are the most sustainable settlements in the rural areas which generally have good local social infrastructure, some local employment opportunities and good accessibility to the towns and larger centres.
- 6.4.5 Clearly, the site has easy access by walking or cycling to a range of day-to-day facilities and services within the village, including day nursery and primary education, top up shopping and open space and play facilities. In addition, further services, supermarkets, employment opportunities, secondary and further education and health care is easily accessible either by regular public transport or cycling within the

local area, Hanley or Endon. Residents of the proposed development would not therefore be reliant on the private car.

- 6.4.6 Utilising the Government's Connectivity tool, the Application Site connectivity score is between 41 and 46 based on an 'overall' scoring for destination and mode of transport. This is a comparable score to other larger villages in Staffordshire Moorlands and indeed sites on the edge of Brown Edge.
- 6.4.7 Taking into account all of the above, the site is considered to be sustainably located where the need to travel would be limited and a range of travel options would be available.

6.5 The Golden Rules

- 6.5.1 The Local Plan (2020) sets the requirement for schemes of over 10 dwellings to deliver 33% as affordable housing.
- 6.5.2 The Local Plan was adopted prior to the 'Golden Rules' being introduced through the NPPF published in December 2024. As such, the minimum affordable housing contribution under the Golden Rules, would need to be 15 percentage points above the existing policy requirement, subject to a cap of 50%. In the instance of Staffordshire Moorlands, this would equate to a minimum contribution of 48% affordable housing contribution. The proposals commit to provide 50% affordable housing on site and as such, exceeds this requirement.
- 6.5.3 The development will provide financial contributions through a legal agreement to provide on-site and off-site infrastructure improvements to local strategic infrastructure. Potential financial contributions are set out in Chapter 4 of this statement.
- 6.5.4 The existing open space and play provision in Brown Edge is ample. However, given the nature and scale of the proposals, new publicly accessible open space and a local area of play has been designed into the scheme and provided on-site for use by existing and future residents.
- 6.5.5 Based on the above, the proposal would meet the requirements of the 'Golden Rules'.

6.6 Sustainability Objectives

- 6.6.1 The three overarching sustainability objectives to the planning system relate to economic, social and environmental matters. The proceeding section summarises the sustainability benefits of the proposals against the three objectives.

- 6.6.2 The proposal for up to 55 new homes will align with the economic objective by ensuring that sufficient land of the right type is available in the right place at the right time to support growth. The identified unmet housing need clearly demonstrates that residential development is required in Staffordshire Moorlands and given the sustainability credentials of Brown Edge, the sites location would be a logical location for growth. The growth of Brown Edge will act as an economic stimulus to support facilities and services in the local area and jobs will be provided through the construction phase.
- 6.6.3 Turning to the social objective, the mix of house types, sizes and tenures will assist in meeting the local housing need for existing and future generations. Whilst design matters will be addressed at reserved matters, the submission clearly demonstrates a well-designed and beautiful development could come forward which assists in designing out crime. The site is well located to connect to existing services and the provision of open space and an area of play on site will support the communities health, social and cultural well-being.
- 6.6.4 The scheme will support the environmental objective by, where feasible, protecting and enhancing the natural environment. The Indicative Layout demonstrates that with the exception of the access points to the site and the Applicants wider landholding, the scheme could retain existing landscaping and incorporate additional planting throughout the development. The proposal could also 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.
- 6.6.5 The submission demonstrates that at Reserved Matters stage, a scheme would be able to contribute to transitioning towards a low carbon economy and the sites sustainable location alongside the provision of a Travel Plan encourages sustainable modes of travel, having a positive environmental impact. The proposal makes efficient use of land by proposing an appropriate housing density and directing development towards land which is not classed as best and most versatile for agricultural purposes.

6.7 Conclusion

- 6.7.1 Thus, taking all the above matters into consideration, the site constitutes grey belt land in a sustainable location, it will assist in meeting an identified unmet housing need and comply with the 'Golden Rules'. In accordance with Policy GB7 (Development which is not inappropriate in the Green Belt) and GB8 (The Golden

Rules) of the NPPF (2026), the development is not inappropriate in the Green Belt and therefore should not be regarded as harmful to the Green Belt.

- 6.7.2 Furthermore, the proposal aligns with the planning systems economic, social and environmental objectives.

6.8 Affordable Housing and Housing Mix

- 6.8.1 The proposed development would provide up to 55 new dwellings comprising a mix of 2, 3 and 4 bedroom, detached, semi-detached and terraced homes, as well as 1 bed apartments. This would include for 50% affordable housing. This equates to 28 affordable homes, split 60% social rented housing units (17 dwellings) and 40% intermediate homes (11 dwellings). These would be fully integrated within the development to be tenure blind and indistinguishable from the market housing.
- 6.8.2 Policy HO7 (Meeting the need for homes) of the NPPF (2026) is clear that substantial weight should be given to the benefit of providing homes which contribute towards meeting the evidenced accommodation needs of the community.
- 6.8.3 Based on the above, the development fully complies the affordable housing element of the Golden Rules, Policy HO7 (Meeting the need for homes), Policy HO8 (Providing affordable homes) of the NPPF (2026) and Policy H3 (Affordable Housing) of the Local Plan (2020).

6.9 Design and Layout

- 6.9.1 The proposed development of up to 55 dwellings would equate to a density of approximately 29 dwellings per hectare. This would strike an acceptable balance between respecting the character of the existing development within Brown Edge and making efficient use of land.
- 6.9.2 Whilst the application is submitted in outline with all matters reserved except for access, an indicative site layout has been designed to demonstrate how the development could be created in keeping with the character and appearance of the locality, reflecting local densities and design, dwelling types and vernacular without detriment to the amenities of existing properties or having any adverse impacts on the built and natural environment.
- 6.9.3 The indicative proposals have sought to retain existing landscape features where feasible and enhance further through additional planting and the creation of a large area of open space to the south, providing an attractive frontage along Breach Road.

6.10 Transport

- 6.10.1 As detailed in paragraph 3.1.3, the existing access will be closed and a new access serving the development will be created off Breach Road to the south. The proposed access is a priority T junction. The main road through the development will link to a single-track providing access to the Applicant's buildings to the northeast.
- 6.10.2 The outline application is seeking approval of the access arrangements. A Transport Statement (04/03/2026) has been prepared by Hub Transport Planning Limited in support of this application. The Statement demonstrates the required visibility splays can be achieved and the swept path analysis has been undertaken to ensure the access point can accommodate a large refuse vehicle, which is the largest vehicle expected to enter the site.
- 6.10.3 With regard to traffic, the site's sustainable location within easy reach of facilities and services to meet the day-to-day needs of local residents will assist in reducing reliance on the private car. A Travel Plan has been prepared which will assist in encouraging sustainable modes of travel.
- 6.10.4 Trip generation has been calculated using the TRICS database and the Transport Statement concludes *that "site access junction is forecast to operate with negligible queues and delays and with significant spare capacity in both peak hours."*
- 6.10.5 Whilst the internal road layout is subject to a reserved matters application, an Indicative Layout has been prepared to support the application. The proposal demonstrates that sufficient vehicle and cycle parking can be delivered on site in line with Policy DC1 (Design Considerations) of the Local Plan (2020).
- 6.10.6 With regard to all transport matters, the proposal fully accords with Policy DC1 (Design Considerations) and Policy T1 (Development and Sustainable Transport) of the Local Plan (2020) and Policy TR3 (Locating development in sustainable locations), Policy TR4 (Street design, access and parking) and TR6 (Assessing transport impacts) of the NPPF (2026).

6.11 Landscape and Visual Impact/Trees

- 6.11.1 A Landscape and Visual Appraisal (LVA) has been undertaken by Influence to assess the impacts of the proposal on the site and surrounding landscape.
- 6.11.2 The proposal would be an extension of the settlement edge at this part of Brown Edge village, with impacts upon Ancient Slope and Valley Farmlands LCT judged to be low, due to containment of the site and some screening.

- 6.11.3 Visually for local sensitive receptors there are only very partial views of the site due to undulating topography and screening vegetation. The structural framework of the site is to be retained and enhanced. Sensitive features such as lines of trees and hedgerow are proposed to be retained, with minor loss to allow for access.
- 6.11.4 Whilst the proposed development would result in new built form on the eastern edge of Brown Edge, the proposed dwellings, as set out on the Illustrative Masterplan, would be consistent with the scale and pattern of the prevailing existing residential character within the wider settlement of Brown Edge. Existing site boundary vegetation would be retained where possible with new boundary planting and stand-offs to existing dwellings being provided.
- 6.11.5 The northern site boundary would be biodiversity enhancement and would assimilate the development into the wider landscape to the north. As such, the LVA concludes that the proposed development would have no significant impacts upon sensitive landscape and visual receptors, and some ecological benefits are predicted due to increased plant species diversity at the site alongside greater opportunities for recreation and play for local people.
- 6.11.6 The proposal aligns with Policy DC 1 (2) of the Staffordshire Moorlands Adopted Local Plan, which outlines that new development should be designed to respect the site and its surroundings and promote a positive sense of place through its scale, height, density, layout, siting, landscaping, character, and appearance.
- 6.11.7 As stated in the LVA, there will be a large change to the character of the site as a result of any new development, however the loss of openness at the site affects intervisibility to the south from within the site only. The proposals present opportunity to enhance boundaries with new planting and improve areas for biodiversity.
- 6.11.8 Effects on visual amenity are generally low, with the highest nature and magnitude of impact predicted to be medium adverse, for views from PRoW CP12 and residential receptors. Magnitude of impact for PRoW CP10 and CP70 are low adverse and low adverse/ negligible, and low adverse for road users also.
- 6.11.9 It is considered in the LVA that there are no significant impacts upon sensitive landscape and visual receptors due to the proposals and some ecological benefits are predicted.
- 6.11.10 The proposal therefore accords with Policy DC3 (Landscape and Settlement Setting) of the Local Plan (2020) and Policy N2 (Improving the natural environment) of the NPPF (2026).

6.12 Ecology and Biodiversity Net Gain

- 6.12.1 The development will provide an overall 15.01% net gain in habitat units, a 12.69% net gain in hedgerow units and a 525.29% net gain in watercourse units. As shown on dwg. BNG.002, this will be delivered through an area of enhanced modified grassland to the north of the built development, two areas of created modified grassland, two areas of other neutral grassland, vegetated gardens and a pond.
- 6.12.2 The Preliminary Ecological Appraisal (PEA) has concluded that adverse impacts are not anticipated on statutory designated sites and direct impacts are not anticipated on non-statutory designated sites. The PEA also advises due to the distance and nature of the wider environment from the site boundary, a direct, adverse impact on the priority habitats is not anticipated.
- 6.12.3 Section 5 of the PEA sets out enhancements which the Applicant is willing to deliver.
- 6.12.4 Due to the close proximity of two functionally linked ponds, the PCA recommends eDNA surveys are undertaken or a District Level License sought. The Applicant will advise in due course which route will be taken.
- 6.12.5 With regard to bats, due to the removal of trees to create the access, aerial inspection surveys on any tree with suitability to support roosting bats is required.
- 6.12.6 A Construction Environmental Management Plan (CEMP) is recommended which can be secured by way of planning condition.
- 6.12.7 Subject to adhering to the PEA recommendations, the development is compliant with Policy DC1 (Design Considerations), Policy DC3 (Landscape and Settlement Setting) and Policy NE1 (Biodiversity and Geological Recourses) of the Local Plan (2020) and Policy N2 (Improving the natural environment) of the NPPF (2026).

6.13 Ground Conditions

- 6.13.1 A Phase 1 Geo-Environmental Assessment has been produced by Erda to provide a pre-development contamination and geotechnical assessment of the site.
- 6.13.2 The assessment identified a potential low risk of contamination from the site's former uses and immediate surrounding land uses.
- 6.13.3 As a result, a Phase II contamination assessment is recommended which the Applicant is willing to secure by way of planning condition. The Report recommends it should include the following:

- *A ground investigation designed to BS10175:2011 and BS5930:2015 to confirm ground conditions and collect soil samples for chemical analysis for contaminants identified earlier.*
- *Chemical analysis of soils followed by risk assessment so that the risk to human health and controlled waters can be determined.*
- *Geotechnical soils testing of the founding strata to assess its character and suitable grades of buried concrete.*

6.13.4 The conclusion is clear that subject to compliance with recommendations, the site is suitable to deliver the proposed residential development.

6.14 Flood Risk and Drainage

- 6.14.1 As detailed in paragraph 2.7, the site sits entirely within Flood Zone 1 and there is a risk of surface water flooding along the southern part of the site. To mitigate risk, a rain garden is proposed to convey any surface water flooding, preserving the overland flows while ensuring any water is directed away from dwellings. The proposed mitigation also includes setting finish floor levels at least 150mm above the finished road levels and where feasible reprofiling the ground such that runoff falls away from buildings.
- 6.14.2 A swale along the western boundary and raingarden are proposed to conveyance the flow of existing surface water.
- 6.14.3 The proposed surface water drainage strategy is for all surface water from the dwellings and roads to outfall into the attenuation pond to the south of the site. The attenuation pond has been designed to accommodate a 1 in 100-year storm event with a 40% allowance for climate change. At a restricted rate, the water will then outfall into the existing Seven Trent Water sewer.
- 6.14.4 In addition to the above measures, the site will include the following sustainable drainage systems; rainwater harvesting system (to be considered at detailed design stage), green roof on the cycle storage, infiltration systems and porous pavements.
- 6.14.5 With regard to the foul drainage, the invert level to the existing manhole is higher than the site entrance. Therefore, an adoptable foul pumping station is required and is proposed at the southern edge of the site.
- 6.14.6 Section 6.1.2 of the Flood Risk Assessment and Drainage Strategy Report (April 2026) states that *“Subject to the mitigation measures proposed, the development may proceed without being subject to significant flood risk. Moreover, the development will not significantly increase flood risk to the wider catchment area.”*

- 6.14.7 The proposal aligns with the local and national flood risk sequential approach of directing development towards areas at lowest risk of flooding given the sites location in Flood Zone 1. Paragraph 027 of Planning practice guidance relating to flood risk and coastal change is clear that a proportionate approach should be taken to the sequential test when, as demonstrated in this case, the scheme ensures that occupiers would remain safe from current and future surface water flood risk for the lifetime of the development without increasing flood risk elsewhere. In such cases, the sequential test need not be applied.
- 6.14.8 Thus, the scheme fully accords with Policy SD5 (Flood Risk) of the Local Plan (2020) and Policy F4 (Assessing flood risk for decision-making), Policy F5 (The sequential test), Policy F7 (Ensuring development is safe from flooding) and Policy F8 (Sustainable drainage systems and watercourses) of the NPPF (2026).

6.15 Agricultural Land

- 6.15.1 The site is classed as Grade 4 agricultural land which is defined as poor quality. Policy SD1 (Sustainable Use of Resources) of the Local Plan (2020) and Policy N2 (Improving the natural environment) seeks to protect best and most versatile agricultural land which is defined in the NPPF (2026) as Grade 1 to Grade 3a land. Therefore, enabling development on Grade 4 agricultural land fully accords with both local and national planning policies.

7 CONCLUSION

- 7.1.1 This Planning Statement has been produced by Heatons to support an outline planning application, with all matters reserved except for access, for the erection of up to 55 dwellings at Land to the north of Breach Road, Brown Edge, Staffordshire.
- 7.1.2 Section 70(2) of the Town and Country Planning Act 1990 and section 38 (6) of the Planning and Compulsory Purchases Act 2004 require planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise.
- 7.1.3 The proposal is for the development of a Grey Belt site. The site is sustainably located, would meet an unmet need for housing, conform with the 'Golden Rules' and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt land across the plan area.
- 7.1.4 The development will deliver a significant number of benefits as summarised below;
- Provision of up to 55 dwellings in a sustainable location.
 - Provision of a mix of house types and sizes ranging from 1 to 4 bedrooms.
 - Delivery of 28 affordable homes comprising a mix of social rented housing units (17 dwellings) and intermediate homes (11 dwellings).
 - Delivery of accessible open space and a Local Area of Plan for existing and future residents.
 - Assisting in meeting unmet housing need in a location which will encourage a modal shift towards sustainable travel given its connectivity to a wide range of facilities, services and public transport.
 - Whilst matters relating to design are to be dealt with at reserved matters, the submission shows a high-quality scheme could come forward which reflects its location on the edge of the settlement.
 - The Energy Statement demonstrate the scheme will encourage energy efficient measures.
 - It makes efficient use of land by proposing an appropriate housing density and directing development towards land which is not classed as best and most versatile for agricultural purposes.
 - The post development plan will have an overall 15.01% net gain in habitat units, a 12.69% net gain in hedgerow units and a 525.29% net gain in watercourse units.
- 7.1.5 The Statement, together with the supporting submission documents has demonstrated that there are no adverse impacts in granting planning permission for



the development. Thus, in accordance with local and national planning policies, planning permission should be granted without delay.



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