

Barton under Needwood Parish Council

Report of the Planning Committee

P/2026/00440 Land at Efflinch Lane

Erection of 55 dwellings including details of access, landscaping and associated infrastructure and works including the creation of an attenuation pond, siting of a pump station and a sub-station

Summary of the objections and the main points of concern:-

- *The site is not allocated for development in the Local Plan;*
- *The site lies outside the settlement boundary of the village;*
- *The Local Plan allocated enough land to meet the housing needs of the village until 2031;*
- *Further development in Barton might impact on the overall development strategy for the Borough;*
- *Should further housing be required in the village then this should be assessed through the preparation of a new Local Plan;*
- *The Strategic Housing Land Availability Assessment 2021 identifies the site as being achievable but not deliverable, suitable or developable;*
- *As far we are aware the Borough has a five year's supply of housing land and, therefore, the Local Plan housing policies should carry some considerable weight;*
- *The layout seems to mirror the adjoining developments. The quality of the residential street is as important as the individual dwellings. The street elevations could reflect more of the character of the village;*
- *No attempts appear to have been made to make, at least, pedestrian links with the adjoining developments. The location of the open space only seems to benefit the nearby occupiers as opposed to the estate as a whole. The affordable housing should be indistinguishable from other market housing. Here it seems to be hidden away from the main access road and is not fully integrated. Amenity space also seems limited;*
- *Trees and hedgerows should be protected and not removed on the boundaries, especially on Efflinch Lane and the boundary with the adjacent Causer Road estate*
- *Does the surface water drainage strategy take account of the raised level of the adjoining site? Does it provide the required level of protection within the development and, at the same time, not increase flood risk to third party properties and local highways:*
- *We understand that there is no spare capacity in the Mill Lane foul sewer, there is downstream foul flooding of property, and the sewage treatment works is at capacity;*
- *To the extent that details of the proposed drainage have been provided, they are not fully compliant with adoptable sewer requirements;*

- *We feel that the Transport Assessment underestimates the number of trips to be generated from the development. Trips from this proposal will add to the congestion at junctions in the village at peak times;*
- *The proposed distance between the access into the site and the junction for Captains Lane does not appear to be compliant with highway standards;*
- *The Travel Plan is underwhelming and lacks ambition.*

Introduction

A major detailed planning application has been submitted by Cameron Homes to develop approximately 2.16 hectares of land off Efflinch Lane. The site is irregular in shape although it, more or less, resembles a rectangle. It is currently a grassed field and not in use although we assume it is classified as agricultural land. To the north is the Causer Road development of 130 houses (P/2011/01359), largely completed by 2017. To the east is a more recent development (P/2014/01490) for 25 dwellings which was developed slightly later than Causer Road. To the immediate south is Mill Lane with residential use on its south side. According to the applicant's Planning Statement (para.2.8), the site is enclosed on all sides by an established line of trees and hedgerows which includes some TPOs on the northern boundary. Access to the site is via a new access road, located to the south of the Captain's Lane junction. This is a 5.5m carriageway with a 1.8m footway.

The application is accompanied by a range of accompanying documents including a Design and Access Statement, a Flood Risk Assessment, a Travel Plan, a Housing Needs Assessment and an Open Space Assessment. There is in addition a proposed layout diagram, detailed house designs relating to a range of house types and sizes. Market housing (60% of the total ie.33) consists of – 8 2bed, 12 3bed, 11 4 bed, and 2 5 bed homes. Affordable housing (40% of the total i.e. 22) consists of 8 1bed, 8 2bed and 6 3 bed homes.

Parish Council Comments

Planning Policy Considerations

1.1 We had been alerted to this proposal by some early press coverage although it took some time for the application to be formally registered and hence the recent consultation on this planning application. We were also made aware that something was happening by a recent postal questionnaire about housing needs by the Pegasus Group, agents for Cameron Homes.

1.2 Legislation dictates that planning applications are required to be determined in accordance with the development plan unless material consideration indicate otherwise. This means that the Local Planning Authority has to assess the proposal against the policies in the Local Plan as well as considering the merits of the proposal itself and any other

relevant considerations such as Government policy as set out in the National Planning Policy Framework (NPPF) December 2024.

1.3 The starting point has got to be what does the Local Plan say about this proposal. The site is not allocated for development in the Local Plan. In fact, the site lies outside, albeit immediately adjacent to the settlement boundary for Barton. The Local Plan was adopted in 2015 and as stated in the document “Note on 5 Year Land Supply Methodology” dated March 2025, the Local Plan continues to meet the housing needs of the Borough up to 2031. Logic would dictate that sufficient land has, therefore, been allocated to meet the needs of the Borough including Barton under Needwood village up to 2031. If that logic applies, then there is no immediate need for this site

1.4 As we noted above the site lies outside the settlement boundary of the village. This defines the built-up part of Barton and means that the principle of development inside the boundary is acceptable, whereas development outside the boundary falls into the open countryside, where restrictive planning policies apply. Here Policy SP 8 states that development will not be permitted unless it meets a range of criteria, for example, if it is essential to meet the needs of an existing business or it is otherwise appropriate in the countryside. If it meets one of these criteria then there is a second range of hoops that it also has to address. We cannot see that this proposal meets any of the criteria of Policy SP 8 as, for example, housing is not regarded as otherwise appropriate in the open countryside.

1.5 The Local Plan sets out a Settlement Hierarchy. Policy SP 2 directs development to the most sustainable locations. The most sustainable locations are defined as Burton and Uttoxeter. The second tier in the hierarchy includes four ‘Strategic Villages’ which are Tutbury, Barton Rocester and Rolleston. Further down the hierarchy are what are referred to as Local Service Villages and then Small Villages and Settlements. The further down the hierarchy you go the less the amount of housing development is proposed as these are less sustainable settlements.

1.6 This is also reflected in the provision of homes and jobs as set out in Policies SP 3 and SP 4 which allocates housing numbers to these layers of the hierarchy. The implication is that you direct development to these more sustainable locations, in terms of services and facilities, so that you restrict development elsewhere. In this way, the Local Plan sets out a development strategy for the whole borough. We, therefore, object to the proposal as being contrary to Policies SP 2,3 and 4. If, for whatever reason, further housing, over and above the Local Plan, is deemed to be required then the sustainable hierarchy of the development strategy surely dictates that it should be directed, in the first instance, to the most sustainable locations, i.e. Burton and Uttoxeter. Approval of a major housing proposal in Barton may, therefore, have a negative impact on the development strategy because enough housing has already been allocated here until 2031.

1.7 The applicants admit that their site falls outside the settlement boundary and, is, therefore, contrary to Policy SP 8. They do not seem to attempt to look at this site against the criteria in that policy merely arguing that if there is no five-year supply then the effect of this policy is reduced. They argue that the site is immediately adjacent to the built-up edge of the village and sits within a transitional area where residential development has already

reshaped the southern part of Barton. As such, they argue that their site forms a coherent extension to the evolving pattern of development. This approach, however, does not address the issue that the Local Plan, adopted in 2015, allocated enough land to meet the needs of the Borough to 2031 and set out a development strategy accordingly. If this southern area of Barton is in a transition, then surely the best approach is for a new Local Plan, looking forward over a longer time period, to identify the future development direction of the village. It should not be determined by an opportunistic proposal. We do not know if further land is likely to be allocated in a future Local Plan in this part of the village. If it isn't then what is this part of the village transitioning into?

1.8 We recognize that the site is surrounded by development on three sides. But we assume that the Local Plan left this site outside of the settlement boundary for a reason. We also recognize that decisions were made for residential use on sites at Causer Road before the adoption of the 2015 Local Plan and, therefore, before the operation of the current policies. There may be other more appropriate uses for the site, and it will be for a new Local Plan to determine what they might be. We also accept that Barton is defined in the Local Plan as a “Strategic Village” and that although the site falls outside of the settlement boundary, the village is regarded as a sustainable settlement. But you determine planning applications in accordance with the Local Plan and, therefore, we submit that the local plan should carry some considerable weight. It is, of course, open to the applicants to promote this site as a potential allocation in the revised Local Plan where it can be considered against other potential sites to meet any identified future housing need.

1.9 We can also refer to the Strategic Housing Land Availability Assessment. This is a document which Local Planning Authorities are required to prepare and keep up to date from time to time. The latest version on ESBC's website is for 2021. This document looks at the potential of sites to meet the Borough's future supply of housing, but inclusion of a site within the Assessment does not bring with it any confirmation that it should be developed. The applicant's site is identified in the documents (Site 92) and whilst it is regarded as being available, it is not considered to be achievable, deliverable, suitable or developable. Indeed, a timescale for development is identified as 15 years+.

1.10 We believe that the Local Plan should carry some considerable weight in determining this application. It is not allocated for development in the Local Plan, and it also falls outside the settlement boundary for the village. As such it is contrary to Policy SP 8 for development outside settlement boundaries. We also note the assessment of the site within the Strategic Housing Land Availability Assessment that it will not be deliverable. Because enough land has been allocated to meet the needs of the village until 2031, then we also believe that it may be detrimental to the development strategy for the Borough as set out in Policies SP 2, 3, and 4. Any new direction in terms of where any future housing growth should take place should be determined through the Local Plan process, where all potential sites can be assessed, as opposed to an opportunistic proposal.

Material Considerations

National Planning Policy Framework

2.1 Government policy as set out in the National Planning Policy Framework December 2024 (NPPF) is regarded as a material consideration. This has recently been updated in view of the Government's proposals for growth which include the target of providing 1.5m homes over the next five years. To meet this requirement a local housing need figure for each district has been identified. This is expressed purely in terms of a nationally derived figure and for East Staffordshire and this is proposed to be 602 houses pa. This is above the 546 houses pa found in the Local Plan (10384 over the period 2012 to 2031). Local Planning Authorities are also required to monitor the supply of housing to demonstrate that there is a readily available supply of land to meet housing needs over a period of five years.

2.2 In the short term, a report to ESBC's Cabinet Meeting 24th March 2025 noted that this national need for further housing is likely to result in a reduction of the housing land supply. The report also suggests that, due to the increased housing requirement, the ability to maintain a 5-year supply is likely to become more difficult. The implication of this is that where a housing land supply falls below 5 years then the weight that can be afforded to housing policies reduces.

2.3 In May 2025, ESBC produced a paper on the current status of the five-year supply as at year ending March 2025. This stated that there was a supply figure of 5.13 years, based on an annual housing need of 637. We note that this annual figure is above the government's estimated global figure for the Borough of 602 houses pa. Whilst the overall supply has reduced, we can only conclude that the Borough still has a five-year supply and, in addition, that this is above the Government's prescribed per annum target.

2.4 We also note that just recently ESBC has published an East Staffordshire Local Housing Needs Assessment Update in February 2026. This document provides a comprehensive assessment of the factors affecting the local housing market including employment, an analysis of the cost and affordability of housing, an assessment of the type and tenure of future housing need and as a result an overall calculation of housing need for the Borough. We assume that this document will set the framework for the housing policies for the new Local Plan. Essentially the study finds a requirement for 616 dwellings per year which equates to 11,088 homes over the period 2025 to 2043. There is also a total annual affordable housing need of 153 per year which represents 24.9% of the total. For the purposes of this study the Borough was divided into sub areas but there was no specific housing need identified for Barton. We note that the proposed housing figure of 616pa is slightly above the Applicant's figure but below the figure of 637 houses pa used in ESBC's five-year supply calculation in May 2025.

2.5 In order to justify their application, the Applicants appear to put great weight on their assertion that ESBC will not be able to meet a five-year supply. From the evidence available to us, the Borough does have a five year's supply, and this is based on a figure of 637 per year which is higher than either the 602 or 616 per year figure. We must also note that the Strategic Housing Land Availability Assessment stated that the land was not

deliverable and put a date of it being potentially developed some 15 plus years hence as from 2021.

2.6 In the circumstances we have outlined above, we still believe that great weight should be given to the Local Plan. We acknowledge that the NPPF is a material consideration, but we believe that the circumstances of a presumption of sustainable development where a five-year supply is not attainable have not been met and consequently, we believe that the Local Plan currently complies with the NPPF guidance.

2.7 One of the key concepts of the National Planning Policy Framework is that there is a presumption in favour of sustainable development. But the Framework clearly states that this presumption does not change the statutory status of the development plan. Where the Local Plan is up to date, which we believe it is, in terms of the five-year supply, then it should prevail.

Design and Layout

3.1 The application is accompanied by a Design and Access Statement, which explains the design principles and concepts that have been applied to the design and proposed layout of the development. The applicant's design vision for the site includes a development which recognises and works with the landscape, provides high quality homes and ensures a well-connected community. This document looks to be a fairly comprehensive assessment of the site which covers key views, an assessment of the local character of the village which includes roofscape, windows, materials and boundary treatments. As a result of this analysis the applicants have come up with a concept design and then they develop a layout from that concept. The concept involves a main estate road aligned west to east with some culs de sac of this with an attenuation pond, for surface water storage, at the far eastern end of the site.

3.2 We are disappointed that the layout has zoned in on this particular concept with no apparent alternative concepts having been identified or tested. The design concept results in a longitudinal layout with a central estate road for serving the development with the vista and focal point at the end of the development being an attenuation pond and the adjoining residential development. A similar style of layout appears to have been adopted as for these two earlier developments, prompting the applicants to claim that they have integrated their design effectively.

3.3 Our view is that the layout lacks creativity and flair. This is particularly reflected in the drawings of the street elevations. Looking at these drawings you get the impression of long lines of houses albeit of different types but all fronting the road. There is some space between the properties, but this is taken up by parking areas, culs de sac and driveways, which appear to lack co-ordination and cohesion. The layout is functional, but surely there can be a more creative and attractive ways of designing streets which link buildings, forms and spaces, and which reflects the character of the village. We perhaps ought to state that we made similar comments about the layouts of the Causer Road developments at the time, but they obviously fell on deaf ears!

3.4 Whilst the ESBC Design Guide is referenced in the Design and Access Statement we are not sure what aspects have been taken into account in this layout. Para 2.2.1 of the Design Guide, for example, states, ***“In residential development the quality of the streets is as important as the quality of the individual dwellings. A well-designed house will be undermined by a poorly designed street. Conversely a carefully designed street can provide an attractive, safe and pleasant setting to a dwelling improving its attractiveness and value as a result”***. Cameron Homes, like most housebuilders appear to have a pattern book of house types which are used in their developments. Typically, these are of square box proportions, but these do not correspond to the wide range of building styles and house types within the village.

3.5 A section of ESBC’s Design Guide specifically references Barton under Needwood and helps to define some of the characteristics of the village which could be reflected in the design:-

- ***The winding Main Street together with Station Road create the backbone to the settlement pattern, with strong frontages edging those streets. The enclosure created by the many buildings is strong though there are also a number of yards and lanes which lends a distinctiveness to Barton;***
- ***Buildings sit both front onto and side onto the street and add variety and interest to the street scene. There is also a wide variety of building styles;***
- ***The predominant building materials are red-orange brick with some limited use of Staffordshire Blue Brick for detailing. Roofs are generally steeply pitched and simply designed ending in gables, some of which turn onto the street;***
- ***New development should reflect these basic characteristics.***

3.6 Our other thoughts on the layout include:-

- Concern regarding the proposed junction with Efflinch Lane. The junction location should be compliant with the document, Manual for Streets. This document requires a separation of at least 30m offset between junctions. From the access into the proposed development to the Captains Lane junction, this measures about 25m, therefore, potentially raising the conflict between vehicles turning into Efflinch Lane from the development and Captains Lane;
- No visibility splay is shown for the proposed junction and assuming the standard set at x 2.4 m and y 43 m, this would result in the need to remove most of the current mature boundary hedgerow and trees fronting Efflinch Lane;
- Despite the applicants stating that the layout maximises the benefit of the site’s proximity to local facilities, it is unfortunate that opportunities to make pedestrian links have not been taken. Half way along the access road, for example, it looks like it might be possible to make a pedestrian link with a hammerhead on the Causer Road site. Also, it is not clear how the area by the attenuation pond links pedestrian access into the adjoining residential development. This is important because then it has links to the Marina, Holland Sports and the Junior School;
- There appear to be no cycle paths, or again no apparent links to the adjoining development. This is strange in the light of the professed objective of maximising the site’s proximity to facilities and the Travel Plan’s objectives;

- The open space appears to comply with ESBC standards but for some reason the majority of the proposed open space is located on the southern boundary of the site. On the face of it, this location benefits the owners of properties fronting that area and also provides a green aspect for properties fronting Mill Lane. This is also an area where the pumping station is located. There appears to be no designated play area or play equipment proposed. We are aware that there is a general consensus among open space providers for one larger area, but the location doesn’t look as though it relates to or integrates within the development;
- We assume that if the attenuation pond is full then will this area have to be fenced off for safety purposes or is it to be regarded as public open space? Comments on the viability of the pond and the pumping station are provided in our response to the Flood Risk Assessment/Drainage Strategy set out in the Appendix. We assert that in order to provide sufficient temporary water storage, there will be a need to deepen the pond and consequently increase its overall area, and provide space for the pumping station and its access road, both of which will in turn need a rethink of the layout;
- Whilst we appreciate the amount of affordable housing being provided within this development, it does appear as though it is contained within one or two locations and hidden within the culs de sac, rather than being integrated more fully within the estate. In some cases, amenity provision for affordable housing units seems limited and not easily accessible;
- Our experience with the Causer Road development is that over time owners have been wanting to extend their properties. As a result, many houses have lost integral garages to additional residential space and in the process front gardens have been paved over to provide additional parking. We, therefore, call on designers to take account of this possibility and to propose layouts in such a way as to reduce the potential for overlooking and also reduce surface water run-off;
- Our other concern with the Causer Road development is with the protection of trees, hedgerows and in some cases trees with Tree Preservation Orders on the sites’ boundaries. As a Parish Council we have commented on many planning applications for permission to lop, top or fell these trees. If no development had taken place, then there would have been no concern, but the paraphernalia of domestic life means that owners wish to remove branches or even fell trees because they feel that they are suffering from daylight problems. We also need to ensure that any built development does not affect root growth. The lesson of this experience is surely that in designing any layout more thought, attention to detail and priority is given to the amenity of the trees and hedgerows such that future issues can be foreseen at the design stage. If the amenity value of the trees and hedgerows demands it, then ESBC should consider making some form of group protection order for trees and hedgerows on the sites’ boundaries. We understand that one particular concern of local residents is the protection and retention of boundary hedgerows;
- We assume that most housebuilders will be aware of the kind of issues that have arisen with the Causer Road housing and would, therefore, wish to design a development which is fit for purpose for the longer term;
- The experience of the Causer Road site is such that perhaps not enough provision has been made for off-street parking. This had led to cars parking half on the road

and half on the footway. We fear that a similar situation may arise here with the potential consequence for inadequate access for emergency services;

- A local resident has expressed concerns to us about the potential for anti-social behaviour in the parking courts. There are also fears about loss of privacy and noise and air pollution. We would like to endorse their request for the Applicants or ESBC to undertake a Crime Prevention Review of the design and layout so as to ensure that spaces are safe, secure and defensible;
- The proposed layout shows a thin strip of land on the northern boundary with the notation, “the ditch is to be replanted”. The status of this land is unclear. How is it to be maintained? Is it part of the total open space allocation? Who is responsible for maintenance and what is the future ownership? Will this area be publicly accessible and what is the role of the proposed gates at either end of this strip?

3.7 Whilst we appreciate the Applicant’s detailed analysis as set out in the Design and Access Statement, we feel that perhaps not enough attention has been given to whether the proposal reinforces the character and identity of the area through local distinctiveness and by respecting local patterns of development. Accordingly, we feel that the proposal may be contrary to Policy SP 24 in not making a positive contribution to the area in which it is located.

Housing Needs Survey

4.1 We note that para 82 of the National Planning Policy Framework December 2024 states that in rural areas planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs. It is, therefore, to the Applicant’s credit that this this planning application has been supported with a housing needs survey. As a Parish Council, however, we did receive some comments to the effect that the survey was rather rushed, and some households noted that there was very little time to respond.

4.2 The Housing Needs Survey was undertaken in April this year with 375 residents responding to a questionnaire, which represented a 19% response rate of all households in the village. The survey asked questions about current and future accommodation needs, including affordability and any special requirements.

4.3 According to the Applicant’s analysis, affordability was highlighted as a growing problem, as younger families and first-time buyers struggled to remain in the village due to rising prices. There also appeared to be a problem for downsizing for older households. Here there was a demand for bungalows. Detached family homes were identified as the second priority. Affordability is relative as the survey noted that 64% could afford more than the median house price of £320,000.

4.4 The applicant’s note that the results are broadly in line with the Parish Council’s own survey in 2024 in terms of recognising the need for affordable homes suitable for first time buyers and accommodation which meets the needs of older residents, especially with accessibility needs. The applicant’s, therefore, conclude that their proposed development

responds positively to this identified need by delivering a mix of dwelling types, sizes and tenures.

4.5 We note from the Survey’s results that, “nearly 1 in 4 residents expressed support for development”. There is little further analysis of this statistic, but this would seem to suggest that 75% or thereabouts were either against the development or did not answer the question. This is not a particular enthusiastic endorsement. Whilst we acknowledge the mix of house types proposed, there is little further detail about the type of affordable housing and of what tenure, be it low-cost housing for sale, shared equity or social housing for rent. The demand for bungalows does not appear to have been met.

4.6 In preparing the Parish Council’s comments on another current planning application for residential development in the village, we tried to get an idea of the impact of such uses on local services. We spoke to the local schools. From what we can gather, the Infant and the Junior Schools are, more or less, at capacity. We have also spoken to the Barton Family Practice. They have expressed concern that with an increase in patients, they would have difficulty coping with an increase in demand, such that it would have an impact on the quality and accessibility of care that they could provide. Of course, more housing will provide additional customers for village shops and businesses, but in the light of these capacity issues, we cannot believe that a further 55 houses, with the attendant impact on local services, will contribute to enhancing or maintaining the vitality of the community as required by the National Planning Policy Framework.

Flood Risk and Drainage

5.1 A flood risk assessment and drainage strategy also accompany the planning application. The Applicants state that the site lies within Flood Zone 1 which has less than a 1 in 1000 annual probability of river flooding. The Flood Risk Assessment claims that the proposed development will not lead to the impedance of flood flows and will not increase the risk of flooding on the site itself, adjacent properties or to third parties either upstream or downstream.

5.2 A Surface Water Drainage Strategy has also been prepared. This seeks to manage the everyday rainfall within the site to avoid direct run off to surface waters or piped drainage systems. This would be achieved through the use of sustainable drainage measures such as permeable surfaces, detention features, and rainwater harvesting. The Applicants conclude that infiltration methods are unlikely to be feasible for surface water disposal at the site. Instead it is proposed to discharge surface water to a ditch (actually the Full Brook) at the southern boundary of the site. In addition, it is proposed that surface water storage is provided on site by means of an attenuation pond at the eastern end of the site. We wonder if the applicants have fully addressed the issues with surface water on this site. Discharging water to the Full Brook on the southern boundary with Mill Road may exacerbate the existing flooding on this area. In addition, we understand that the developers of the Causer Road site raised the level of their land specifically in order to address the issue of surface water. This will mean that the Causer Road site will be higher than the applicants’ site and may attract additional run off onto this site. Has this potential impact been taken into account?

5.3 As far as foul water drainage is concerned the Applicants refer to a Development Enquiry Response Letter, set out in Appendix M of their report. Severn Trent Water (STW) apparently confirms that a gravity connection to the existing foul network via a manhole in Mill Lane is acceptable and will not have an adverse impact on the network. Appendix M appears to be missing from the Applicant's report on the ESBC website. We have been forwarded an email from STW to a resident, concerned about flooding, in which STW state they have no record of issuing a Developer Enquiry Response letter. Either the applicant or STW is incorrect. In order to resolve this issue, we request that ESBC ask the applicant to provide Appendix M for review.

5.4 Development foul flows are intended to drain by gravity to a pumping station at the southern end of the site. From here flows will be conveyed via a rising main to a break chamber before ultimately gravitating to the Sewage Treatment Works via the foul water sewer in Mill Lane. It is intended that further details of the foul sewer network will be presented at a detailed design stage.

5.5 The issue of foul drainage and flooding is a cause for concern for the village. Without seeing the response from Severn Trent, we find it hard to believe that they appear to be saying the Applicant's arrangements for foul drainage are acceptable. Our understanding is that the Mill Lane sewer is overloaded and has no capacity. Downstream properties fronting the A38 Lichfield Road actually suffer foul flooding. We also understand that the existing sewage treatment works is at capacity and that there is insufficient capacity to cope with additional flows at the present time and that any improvements to upgrade the foul sewerage network are not within the current Asset Management Plan period 2025 to 2030. The Applicant's response to this is simply to state that Severn Trent Water is obliged to accept foul water flows subject to planning permission and, therefore, will need to make the necessary arrangement to ensure that there is required provision.

5.6 In the light of our detailed analysis, provided in the attached Appendix, we believe that the proposal fails to meet the requirements of Policy SP 27 where unacceptable harm may be caused to the existing watercourse system due to inadequate arrangements for attenuation, surface water run-off and the arrangements for foul drainage. In this latter case, unless there are well designed and maintained foul water pumping stations, then this could cause noise and odour problems contrary to Policy DP 7

Detailed comments regarding flood risk, surface water drainage and foul drainage are set out in the attached Appendix.

Transport Assessment

6.1 The Transport Assessment looks at the sustainability of the site as well as the likely trips generated from the proposed 55 dwellings. Trip rates have been derived from a database of similar sites throughout the country. According to para 6.7 of the Assessment, the proposed development is likely to generate a total of 29 trips in the AM peak hour (8:00-9:00am) and 26 trips in the PM peak hour (17:00-18:00pm). Obviously, the number of trips

generated by the development will depend on the type of dwellings proposed as well as the car ownership rate.

6.2 On first glance, these figures seem low. Anecdotal evidence certainly suggests that since the Causer Road development traffic levels in the village have certainly increased, and that further housing can only add to the issue. Despite the Applicant's emphasis on the sustainability of the location, we feel that it is likely that parents may ferry their children to school (especially the Infants School) by car adding to the considerable congestion in the village at the morning and afternoon peaks when the schools are open.

6.3 The distribution of trip generation from and to the site within the wider highway network has used a gravity model which uses journey to work data from the 2011 census. This data identifies the workplace locations for people living within East Staffordshire and travelling to work by car or van.

6.4 Table 6.3 identifies the work destinations derived from this analysis. You have to remember that these are work destinations from the East Staffordshire area as a whole which makes assumptions that a similar pattern of commuting could take place from the proposed development. They are also based on 2011 census data and, therefore, trends or patterns of commuting might have changed in the intervening years not least a preference for working from home for at least part of the time. But it is the only guide available as to what might happen. Not surprisingly the data shows that a majority of commuting is local to within East Staffordshire and Lichfield, but there is also a not insubstantial amount of commuting to Birmingham.

6.5 This trip generation data is then used to model the effect of additional traffic generated by the development on the existing junction arrangements. This data was supplemented by a traffic count taken in March 2025. We understand that the traffic counter was disabled after only a few days and not repaired, so the information generated from this source may be of limited value at best. The Applicant's conclude that the surrounding highway network provides sufficient capacity to accommodate the additional traffic from the development during peak hours and will continue to have capacity to 2031 and beyond.

6.6 Whilst we note the results of this analysis, we also feel that that because it is desk bound research that it does not reflect the experience of local people in the village especially at peak times. Traffic generation from the development would appear to be on the low side, and, because of this, they may be underestimating the effect on the Efflinch Lane junction with Main Street/Station Road. We would urge the traffic consultants to see the problems at these peak times in the village for themselves rather than relying on desk research.

Open Space Provision

7.1 The Applicant's Open Space Assessment identifies a requirement for 4,047 sqm of open space. This space is located on the periphery of the site especially on the southern boundary and the attenuation boundary to the east. The calculations in the report seem to

follow the ESBC guidelines as set out in the Open Space Supplementary Planning Document. We assume that these calculations are accurate and, therefore, we have no reason to question them accordingly.

7.2 What is not clear is whether or not the area for the attenuation pond is included as part of the open space provision. If it is then this would appear to be disingenuous as obviously an attenuation pond provides for a different purpose. Whilst a water feature may be attractive in itself, it cannot functionally be regarded as freely available for open space recreation. This would seem to suggest that further provision should be made elsewhere as compensation for the loss of an open space area. If it doesn't then the amount of open space would appear to be on the low side and not really benefitting the majority of the 55 houses proposed due to its location on the southern boundary. Please see our comments above in the Design section.

7.3 The Assessment concludes that as the village already exhibits a range of open space provision and types then there is no need to repeat these uses within their development. They see their natural and semi-natural greenspace as complementing the existing provision. No provision appears to have been made for any play equipment. The assessment suggests that the open space could be agreed through a S106 agreement and transferred to the Local Authority at the appropriate time. It also indicates that it is the applicant's intention to appoint a Management Company for future maintenance. We understand from the residents of the Causer Road development that their experience with a Management Company has not been good. We would, therefore, like to suggest that the applicant's request for such a company be not acceded to. Instead in view of the relatively small area involved and its future limited maintenance requirements based on its semi natural character, that open space be transferred to the local authority in perpetuity.

Travel Plan

8.1 A Travel Plan accompanies the planning application. Travel Plans are long term management strategies for integrating proposals for sustainable travel into the planning process. The main purpose of the Travel Plan is to ensure that sustainable modes of travel are available for occupiers and visitors. It encourages the reduction of the use of the car especially for single occupancy use in favour of promoting more sustainable modes of travel, such as walking, cycling and the use of public transport.

8.2 The Travel Plan strategy includes appointing a Travel Plan Co-ordinator prior to the occupation of any properties. The Co-ordinator will keep up to date all sustainable travel options within the immediate area and will issue a Travel Plan questionnaire to assess the use of each mode of travel. The Travel Plan assesses the infrastructure for walking cycling and bus transport (and this is repeated in the Transport Assessment). The Co-ordinator will also prepare a Residential Travel Information Pack for each new house.

8.3 With regard to bus services the Travel Plan refers to the "Causer Road" bus stop on the western side of Efflinch Lane. There is currently no bus stop sign on the eastern side of the road which would be used by residents from the development when buses navigate a route through the village southwards down Efflinch Lane, along Captains Lane and then

Wales Lane and westwards out of the village along Main Street towards Yoxall. The bus stop was removed by the developers of the Causer Road development so as to facilitate frontage development on Efflinch Lane. For whatever reason, it was never replaced. The provision of this Travel Plan might be a good opportunity to rectify this situation and also perhaps assess the adequacy of provision for waiting passengers.

8.4 A section of the Travel Plan sets out some proposed measures for each mode of transport. The emphasis of these measures appears to be promotion rather than any actual physical infrastructure. We have previously referred to that lack of attention to pedestrian and cycling access, particularly linking to adjoining sites in the Design section.

8.5 The Travel Plan also sets out what appears to be an underwhelming and not very ambitious target of reducing single occupancy car use by 10%. There appears to be no timeline for the achievement of this target. We would like to point out that according to a similar Travel Plan for the Causer Road development projected a 14% reduction in single occupancy car trips over a five-year period, from the first Monitoring Report in 2017. The final Monitoring Report in 2023 found that this target had been more than achieved, reducing such travel by car, we believe, from 83% to 61%. If this substantial reduction can be achieved on the Causer Road development, then there is surely no reason why a similar ambitious target should not be set with this proposal.

8.6 Whilst we appreciate the Applicant's preparation of a Travel Plan, we feel that the emphasis of this document is on promotion rather more than physical features which will better help to promote sustainable travel. Accordingly, we feel that it may not meet the requirements of Policy SP 35.

Recommendation

That this report be submitted to East Staffordshire Borough Council as representing the Parish Council's comments on the planning application P/2026/00440 for housing development at Efflinch Lane. In particular, the Parish Council objects to the application as being contrary to Local Plan policies, SP2,3,4,8, 24,27,35 and DP7.

Appendix

Detailed comments on Flood Risk, Surface Water and Foul Drainage

Flooding and flood risk is a material consideration. The NPPF sets out requirements for avoidance of flooding and flood risk when the local planning authority considers development proposals. ESBC has specific policies which applications should comply with, these being SP27 and DP7. This is relevant because Barton under Needwood village suffers from significant floods and flood risk which is a major concern to residents. The Parish Council regularly meets together with the Environment Agency, Severn Trent Water and Staffordshire County Council (both as Highway Authority and Lead Local Flood Authority (LLFA)). The purpose of this forum is to coordinate investigation of causes and extent of flooding/flood risk and seek to mitigate risk.

River flooding from the Full Brook and local surface water flooding has historically caused major flooding in Efflinch Lane, Mill Lane and the proposed site. This is evidenced in the LLFA Section 19 Report for the major 2020 flood event which caused validated internal flooding of 69 properties and external flooding of many more.

The report provides significant detail on the extent and cause of flooding in the area of the application site. It is noted that the Section 19 report conclusions are generally at variance with the content of the applicants Flood Risk Assessment and Drainage Strategy. Given this variance and the flooding sensitivity in the area the PC has arranged for the review of the FRA/Drainage Strategy by a drainage expert who before retirement worked for both LLFAs, water companies and developers. The results of the review are set out below.

In the Flood Risk Assessment and Drainage Strategy, Introduction paragraph 1.10, it is claimed that *“From the findings of this report, the development proposals are considered appropriate for the site location; therefore, should be fully supported through the Planning process in terms of Flood Risk, Foul and Surface Water Drainage.”*

Upon detailed examination of the report, however, this conclusion is disputed for the summary reasons set out below

- Conclusions based on the hydraulic modelling in the Appendix are not accurate because:-
 - The Full Brook catchment extent is not correct;
 - Structures which control flow rate are not correctly represented in the model;
 - The model does not extend to a point of free outfall or correctly include culverts, flow control structures and associated basins;
 - The model has not been validated for accuracy by calibration and thus its predicted flood levels and flood flow paths may not be accurate;
 - The model does not replicate the known flowpaths for floodwater which run from the 3 ditch crossings of Efflinch Lane into Mill Lane. This is because the unnamed tributary ditches have not been included in the model;

- The site is subject to river flood risk as confirmed by SCC LLFA
- The description of the existing site drainage fails to recognise the culverted field ditch to the north and its use as the current primary outfall collecting surface water flow from the site;
- For reasons provided in detail, the surface water drainage strategy will not work as described and is not to STW adoption standards;
- The proposed layout does not provide sufficient plan area for the proposed attenuation basin and no space for the surface water pumping station or its means of access;
- It is claimed that consultation has taken place with Severn Trent Water with a STW Developer Enquiry response confirming agreement to a foul water connection provided in Appendix M. However, Appendix M does not exist and upon enquiry STW state they have no record of a Developer Enquiry for this site;
- The foul water sewer in Mil Lane and A38 Lichfield Road is subject to surcharge and flooding of properties. Mill Lane foul water sewer is on an enhanced maintenance regime in order to mitigate flood risk to residential properties.

Chapter 3 Flood Risk

Flood risk from watercourses

In paragraph 3.5, it is stated that in accordance with the EA Flood Map, the application is located in flood zone 1 and hence not at risk of flooding from rivers. Whilst technically correct with regards to main river flooding, the Flood Map does not include the Full Brook which is an Ordinary Watercourse.

The SCC LLFA Section 19 Report specifically confirms flooding from the Full Brook and the Appendix B topographic survey demonstrate that when the brook overflows, floodwater will cross the site with overland flow route to the north eastern part of the site.

It is not correct to state that there is no flood risk from watercourse. Currently, localised flooding of the site, as a field does not create risk to property in the surrounding area but if the site is developed as proposed, there will

- Be a risk to property within the site
- A risk that the development will prevent some of the floodwater overflowing at the site location resulting in more floodwater being diverted to Efflinch Lane and Mill Lane and increased risk to existing properties

Flood risk from surface water

The risk of flooding from surface water is considered in paragraphs 3.12 -3.19. It is acknowledged that the EA Surface Water Flood Map, shown in Appendix E, shows significant flood risk within the site and particularly to the north and east areas. As requested by SCC LLFA, the applicant has commissioned Hydraulic Modelling by JBA consultants with the resultant report shown in Appendix F.

Based on the hydraulic modelling, it is claimed that whilst there is some predicted surface water flooding, average depths of water across the site are generally below 0.35m. As a

result, it is claimed that the proposed residential development is at low risk of flooding from surface water. It is also claimed that risk can further be managed with external levels designed to ensure that surface water flows are routed away from the more vulnerable areas towards the proposed drainage network. These assurances, however, are based on the uncalibrated hydraulic model which, for reasons explained above, cannot be assumed to be accurate.

Flooding from Sewers

In paragraph 3.24 it is stated that STW sewer records, provided in Appendix I, identify existing foul sewers in Efflinch Lane and Mill Lane to the west and south of the site, respectively. The plan in Appendix I, however, does not contain STW sewer records. The plan does show some, what are described as, storm drains and gulley connections. Based on local knowledge the information is broadly accurate but incomplete as the northern boundary ditch is not shown.

Para 3.25 correctly states that there are no existing sewers within the site boundary. It then claims that the proposed site is not considered to be at risk of flooding from adjacent sewers. Whilst this may be correct in the undeveloped state, if a foul water connection is made to the foul water sewer in Mill Lane as proposed, surcharge of this sewer at the point of connection could result in backup and flooding within the site. Given that it is known that the foul water sewer is overloaded, this risk should be checked and confirmed with STW.

Risk of Flooding from the Proposed Development

Risk of flooding due to the development is considered in paragraphs 3.28 – 3.30. Encroachment of development on the floodplain is dismissed and the presence of a floodplain associated with the Full Brook is not acknowledged.

It is also claimed that, since baseline hydraulic model results show that during the 1.0% AEP and 3.3% AEP events flooding is largely contained within the modelled channels and ditches. there is no risk of the site impeding flood flow. This is not the case because the proposed development attenuation basin cuts off the primary flow path to the culverted land drain downstream of the northern site boundary. It also assumes the accuracy of the uncalibrated hydraulic model.

In the current situation virtually all surface water runoff from the site plus floodwater from the Full Brook flows to the ditch on the northern boundary. There is little if any discharge into the Full Brook. The Drainage Strategy proposes that all flows are pumped into the Full Brook. Although it is stated that the pumped flow rate will be limited to 3 l/s, this is an additional contribution into a watercourse which is already subject to regular flooding.

It is suggested that through the implementation of the Drainage Strategies for removal of surface water and foul water that flood risk is reduced to an acceptable level. On examination the Surface Water Drainage Strategy, however, this will not work. The Foul Water Drainage Strategy assumes that pumping foul flows at a rate, not stated, into a heavily surcharged sewer, where downstream properties are already subject to flooding will not increase foul water flood risk and ESBC would issue a planning consent for development which includes this arrangement.

In the light of this analysis, we do not believe that sufficient attention has been paid to the particular local drainage circumstances of the site and potential increased flood risk created by the development.

Chapter 4 Drainage Strategy Surface Water

The Drainage Strategy is described in Chapter 4 paragraphs 4.2 – 4.31. This is supported by a layout plan in Appendix K and hydraulic calculations in Appendix L. Reference in paragraph 4.19 to calculations in Appendix J is clearly incorrect.

Based on desktop assessment with no site infiltration testing undertaken it is stated that removal of surface water runoff by infiltration is not viable. Based on local knowledge and the fact that the adjacent Causer Road development drains ultimately to watercourse, the Parish Council accepts this judgement.

The requirement to discharge to a watercourse and details are provided from paragraph 4.10 onwards. In paragraph 4.10 it is stated that an existing ditch has been identified along the southern boundary of the site and in 4.11 it is stated that all surface water generated by the development will be discharged into this ditch at a controlled flow rate of 3 l/s. This ditch is the Full Brook running alongside Mill Lane and the cause of existing flooding as confirmed in the SCC LLFA Section 19 Report.

The claim that the discharge of 3 l/s will result in a betterment and reduce existing flood risk is simply wrong, and this is demonstrated by the JBA Hydraulic Modelling Report shown in Appendix F. Whilst there are technical issues with the accuracy of the modelling identified elsewhere in this response, the modelling includes for the existing field boundary ditch on the north side of the site

This ditch leaves the site in the northeast corner and passes through the Causer Road development ultimately discharging into the Full Brook downstream of the development as shown in figure 2-1. As modelled using data from the topographic survey, surface water runoff within the site moves by overland flow to the northeast corner and is removed via the culverted ditch. Similarly, floodwater which overflows from the Full Brook into the site flows to the northern ditch.

In summary, there is little if any runoff from the site into the Full Brook and thus any discharge from the developed site will add additional flow and increase flood risk. The Drainage Strategy, even if it works as claimed, will not provide betterment and reduce flood risk.

As described in Section 4 and shown on the drainage layout drawing in Appendix K, the site will be drained via a standard surface water drainage system, designed to STW adoptable standards. To limit flow rate of discharge to Full Brook to 3 l/s it is necessary to attenuate and store a volume of water when inflow exceeds 3 l/s. Some attenuation is provided in underground storage tanks but mainly in a large open attenuation basin. A surface water pumping station is provided immediately downstream of the basin, and this will discharge to the Full Brook.

Leaving aside the accuracy of the Appendix L hydraulic calculations, there are a number of flaws with the design layout.

No space has been allocated for the surface water pumping station. A plan area of 30 m x 18 m would be required, if adopted by STW.

No space has been allocated for a vehicular access drive from the road to the pumping station

The attenuation basin is sized on the basis of continuous pumping at 3 l/s to Full Brook. TW requirements, however, are that *“The controlled flow rate from attenuation should be approximately 15% less than the pump flow rate to provide pump rest periods” and “Half the storage should be pumped in 24 hours.”*

No allowance has been made for temporary storage which would be needed in the event of pump failure.

Given these points, the area allocated for the basin is not adequate.

Some of the surface water sewers upstream of attenuation basin have insufficient cover depth and are too shallow for adoption by STW. STW require a minimum depth of cover to the crown of the pipe to be 1.2 m. This can be achieved by deepening the pipes, but this results in a need to deepen the attenuation basin which in turn will increase its plan area.

Appendix L Drainage Calculations

It is noted that no calculations have been provided for the proposed foul water network. Whilst not unusual for gravity networks, they should be provided where a pumping station is proposed.

The surface water calculations have been reviewed and contain errors which make the results inaccurate and incomplete.

There is a discrepancy, in particular, between the stated invert level of the bed of the attenuation basin of 49.625 mAOD and the incoming/outgoing pipe invert levels of 49.475 mAOD and 49.350 mAOD respectively. This would result in the bed being above the pipes which is clearly incorrect.

The model does not include for the pumping station. An attempt to provide a fixed 3 l/s flows rate using a theoretical flow control device (hydrobrake) will not provide accurate simulation because to flow/water level will not be the same as for a pump.

Appendix F JBA Hydraulic Modelling Report

JBA, well recognised as a competent hydraulic modelling consultant has undertaken modelling of part of the existing Full Brook catchment in order to determine existing

baseline flood risk conditions in the catchment in which the proposed development is located. In Section 5 of the report, however, it is stated that

“Model calibration was beyond the scope of this model build. There is also no gauge data or detailed fluvial historical flood risk data available to enable model calibration at the site and the surroundings. As a result, the model is uncalibrated.”

A calibrated model is one in which modelled results are compared with and shown to match actual observations of levels and flood extent during flooding. If the model results match the observed levels etc, the model can be assumed to be accurate. The accuracy of an uncalibrated model is less clear, and results should be used with a degree of caution.

As noted, there is detailed fluvial historic data available in the SCCLFA Section 19 Report on the major 2020 flood event. This report confirms that the Full brook culvert which passes under Efflinch Lane and outfalls next to the site was overwhelmed and floodwater flowed via Efflinch Lane into Mill Lane. In addition, two culverts for tributary ditches crossing Efflinch Lane to the south also flooded with floodwater diverting along Efflinch Lane and into Mill Lane.

The extent of direct hydraulic modelling shown in figure 2-1 shows the tributary watercourse has not been modelled and hence this floodwater flow path which impacts the development site is not recorded.

In general, the methodology of hydraulic modelling with sensitivity testing etc is industry standard. For the additional reasons set out below, however, there are issues with the relative accuracy of the reported results meaning that they give a general rather than accurate understanding of locations at risk of flooding and flood level.

The assumed extent of the catchment upstream of the A38 is shown in figure 2-2 but unfortunately is not correct. There are additional areas at the southern end of Efflinch Lane and Green Lane that form part of the catchment.

As shown in figure 2-1, modelling terminates at the culvert which passes under the A38. It does appear to include the syphon crossing beneath the canal, but the lack of detail means that the accuracy of syphon modelling is unclear.

Beyond the A38 the Full Brook remains in culvert for approximately 200 m before discharging into open channel. It is only at this point where there is a clear free outfall. Unless the model is extended to this point of free outfall, it is not possible to allow for any lack of capacity through the culverted section and which would cause elevated flood water levels upstream and towards the development site.

It is unfortunate that although there are 5 Appendices listed, none of them are populated. For example, if Appendix C Hydraulic Structures Log had been populated, it would be possible to review the accuracy of modelling of the culverted ditch at the northeast boundary of the site and the syphon under the canal could be confirmed.

Chapter 4 Drainage Strategy Foul Water

In paragraph 4.32 it is claimed that a development enquiry for the development was submitted to STW and that the STW Development Enquiry Response Letter is shown in Appendix M. It is stated that this response confirms that a gravity connection to the existing foul network via manhole 1601 in Mill Lane is acceptable and will not have adverse impact on the network.

There are a number of problems with this statement. Appendix M does not exist. Noting this discrepancy, an objector made enquiries of STW, receiving the STW response reproduced below

"Good Afternoon

Thank you for your email.

We have checked our records and cannot find any evidence that we have been consulted regarding this development proposal.

We are, however, aware of existing issues on the local wastewater network. Unfortunately, Severn Trent Water is not a statutory consultee for planning applications of this nature, and therefore we are not always consulted as part of the planning process.

Given the concerns you have raised regarding network capacity, flooding, and the potential impact of additional development within the area, we would strongly recommend that you submit these comments directly to the Local Planning Authority so that they can be considered as part of the planning application process.

In the meantime, we will undertake further investigations to assess the potential impact that additional flows from the proposed developments may have on the existing network.

Kind regards

Belal Ali

**Senior Evaluation Technician
Asset Protection
Asset Strategy & Planning**

asset.protection@severntrent.co.uk

As a minimum it is requested that ESBC require the Applicant to provide a copy of the Developer Enquiry Response on which they seek to rely.

It should also be noted that in the STW response above it is stated that STW is aware of existing issues on the local wastewater network. This was separately confirmed in a STW Developer Enquiry response in respect of planning application P/2025/00513 for land at The Green, which stated

"Due to the nature of the development, the additional flows and existing flood and surcharge levels, there is insufficient capacity within the Severn Trent network at present and modelling will be required, which may show that improvements are required to the Severn Trent network."

There is no reason to suppose that STW response to this proposed development would be any different given that through the Parish Council liaison with STW, we are aware that the foul water sewer which outfalls through Mill Lane and the A38 Lichfield Road is heavily surcharged such that properties on Lichfield Road are subject to flooding. Mill Lane properties have been subject to historic flooding which is now relieved by enhanced sewer maintenance.

In paragraph 1.9 it is stated that

"A suitable foul water outfall by way of a gravity connection to Severn Trent Water (STW) foul sewer in Mill Lane has also been identified for the proposed development."

However, in paragraph 4.32 it is stated that

"Foul flows from the proposed plots will drain by gravity to the foul pumping station in the southern extent of the site via gravity. From here, flows will be conveyed, via a rising main, to a break chamber, before ultimately gravitating into the STW network at manhole 1601".

The Levels and Drainage Strategy drawing shown in Appendix K show the pumping station and rising main arrangement, so it is assumed that the statement in paragraph 1.9 is incorrect. Unfortunately, despite its title, the drawing does not provide levels. The Drainage Calculations in Appendix L does not include any foul water information. As a result, the need for a pumping station has not been justified. STW requires justification of the need for a pumping station and would expect a gravity solution if one is available.

From a planning policy point of view unless there are well designed and maintained foul water pumping stations this could create a risk of noise and smell problems contrary to ESBC policy DP7

It is stated in paragraph 4.36 that

"In accordance with relevant drainage policy, STW are obliged to accept foul water flows from a proposed development, subject to the site receiving planning consent. In anticipation that such a consent will be granted for the proposed residential scheme, it is expected that STW will make the necessary arrangements to ensure that the required provision within their public foul sewer network and treatment works will be available at the time that the Applicant wishes to connect the site's foul sewers to the public foul network. "

It is correct to state that there is a right of connection for foul water flows to a public foul water sewer, subject to the obtaining of a planning consent. This legal right of connection assumes that any issues of flooding/flood risk will be addressed, as part of the planning consent. If ESBC is minded to approve the application, then in order to protect residents and property from flooding, it is requested that a condition requiring no occupation of property until improvements to the receiving foul water sewer network have been made.

Chapter 5 Summary and Conclusions

In paragraph 5.6 it is claimed that the FRA has *“been demonstrated that the site will not be at any significant risk of flooding.”*

In paragraph 5.7 it is claimed that the FRA has *“demonstrated that the proposed development will not exacerbate the risk of flooding to third parties either upstream or downstream from the site”*

The above analysis of the document sets out in detail the reasons why neither conclusion is correct.