

FORMAL RESPONSE TO PLANNING APPLICATION

FROM Strategic Planning and Placemaking	REFERENCE	26/42032/OUT
TO Development	CONTACT	Alex Yendole
FAO Gerald Walsh	DIRECT DIAL	07800 619530
DATE 20 July 2026		

Application No: 26/42032/OUT

Proposed development: Outline planning application for the construction of up to 80 dwellings, including access, landscaping, sustainable drainage and associated infrastructure. All matters are reserved except for primary vehicular access from Knightley Road, Gnosall

Location: Land off Knightley Road, Gnosall, Stafford

With reference to the above-mentioned application for up to 80 new dwellings at Gnosall Key Service Village beyond the settlement boundary, I wish to submit the following observations.

National legislation requires planning applications to be determined in accordance with an adopted Local Plan:

'If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise.'

Planning and Compulsory Purchase Act 2004, 38(6)

The National Planning Policy Framework 2024 ("the NPPF"), published on 12 December 2024, is a material consideration of significant weight in determining planning applications. Paragraph 2 of the NPPF reflects the position of the Planning and Compulsory Purchase Act 2024.

On the basis of NPPF paragraphs 2 & 48 it is the position that Stafford Borough Council can use the Plan for Stafford Borough 2011-2031 ("the adopted local plan") for decision-making purposes. The adopted local plan comprises:

- The Plan for Stafford Borough Part 1 (2011-2031) – adopted June 2014
- The Plan for Stafford Borough Part 2 (2011-2031) – adopted January 2017
- Gnosall Neighbourhood Plan: made / adopted November 2015

It should be noted that the adopted Plan for Stafford Borough has 6 years remaining through to 2031. The court of appeal in *Peel Investments v Secretary of State for Housing, Communities & Local Government [2020] EWCA Civ 1175* confirmed that the expiry of a local plan period does not automatically render the policies of a plan

out-of-date. Therefore Stafford Borough's adopted Plan policies, including the Borough's development strategy, must continue to be used for decision-taking.

The proposed housing development is located on land outside of the settlement boundary identified in the adopted Plan for Stafford Borough 2011-2031 and the 'made' Gnosall Neighbourhood Plan (November 2015). Therefore based on the adopted Plan for Stafford Borough and Spatial Principle 7 the principle of new development in this location is not appropriate as it is outside of the settlement boundary for Gnosall.

On 12 December 2024 the National Planning Policy Framework (NPPF) was updated and a new standard methodology is now being used to calculate the local housing need. This new methodology has resulted in the Local Housing Need target for Stafford Borough increasing from 358 dwellings per year to 760 dwellings per year, and the housing provision of the adopted Plan's Spatial Principle 2 for 500 dwellings per year superseded. This increase has resulted in a reduction of the 5-year land supply to 1.95 years, based on year end data as at 31 March 2026.

Due to the loss of 5-year land supply, paragraph 11 of the NPPF now applies alongside the adopted Plan for Stafford Borough 2011-2031 and the 'made' Gnosall Neighbourhood Plan, that being the presumption in favour of sustainable development for decision taking. Paragraph 11 of the NPPF sets out the presumption in favour of sustainable development for decision taking, with the following national planning policy context to be considered, noting that footnote 7 does not relate to the proposed development:

"Plans and decisions should apply a presumption in favour of sustainable development.

For decision-taking this means:

- c) approving development proposals that accord with an up-to-date development plan without delay; or*
- d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date⁸, granting permission unless:*
 - i. the application of policies in this Framework that protect areas or assets of particular importance⁷ provides a strong reason for refusing the development proposed; or*
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.*

As a result this means that the first parts of Spatial Principle 7 from the adopted Plan for Stafford Borough 2011-2031 alongside Policy SB1 (detailed below) from Part 2 of the adopted Plan for Stafford Borough carry less weight in relation to new housing development, concerning settlement boundaries including at Gnosall:

Policy SB1 Settlement Boundaries

Settlement Boundaries for the settlements listed in Policy SP3 are identified on the following inset maps:

Stafford, Stone, Eccleshall, Gnosall, Hixon, Great Haywood, Little Haywood / Colwich, Haughton, Weston, Woodseaves, Barlaston, Tittensor and Yarnfield

Nevertheless applying the NPPF's presumption in favour of sustainable development does mean that the majority of policies in the adopted Plan do continue to carry full weight for decision-making, in particular policies SP3, SP6, C5, N6 and elements of SP7 in order to deliver sustainable development. Spatial Principle 7 (SP7) sets out criteria to be considered when establishing settlement boundaries related to the location of new sustainable development:

- a) is in, or adjacent to, an existing settlement;*
- b) is of an appropriate scale to the existing settlement;*
- c) is accessible and well related to existing facilities;*
- d) is accessible by public transport, or demonstrates that the provision of such services could be viably provided;*
- e) is the most sustainable in terms of impact on existing infrastructure, or demonstrate that infrastructure can be provided to address development issues;*
- f) will not impact adversely on the special character of the area, including not impacting on important open spaces and views, all designated heritage assets including, Listed Buildings, Conservation Areas and locally important buildings, especially those identified in Conservation Area Appraisals;*
- g) will appropriately address the findings of the Landscape Character Assessment, and the conservation and enhancement actions of particular landscape policy zone / zones affected;*
- h) will not lead to the loss, or adverse impact on, important nature conservation or biodiversity sites;*
- i) will not lead to the loss of locally important open space or, in the case of housing and employment, other locally important community facilities (unless adequately replaced);*
- j) will not be located in areas of flood risk or contribute to flood risk on neighbouring areas;*
- k) will ensure adequate vehicular, pedestrian and cycle access as well as cycle and short stay parking facilities on the site; and*

l) will not adversely affect the residential amenity of the locality.

The adopted Plan for Stafford Borough's Spatial Principle 3 does set out the sustainable settlement hierarchy of Stafford, Stone and the Key Service Villages together with Spatial Principle 4 providing a spatial distribution of Stafford (70%), Stone (10%), Key Service Villages (12%), and rest of the Borough (8%). It should be noted that as at 31 March 2026 the actual distribution, taking account completions and commitments since 1 April 2011 is Stafford at 71.7%, Stone at 9.6%, Key Service Villages at 11.1%, including Gnosall, and the rest of the Borough at 7.6%.

Within the context of Spatial Principle 7 and criteria b) for Gnosall as at 31 March 2026, the existing settlement has 1,919 houses and 4 new homes with planning commitments. Therefore 80 new residential units would result in a 4.1% increase in the size of the settlement and cumulative 8.8% increase when taken together with other sites amounting to 90 units currently subject to the planning application process.

The following information related to this new development location at Gnosall should also be considered as part of the decision-making process, from the Council's published [Initial Sustainability Appraisal Report](#) at the Preferred Options stage (October 2022) within the context of the criteria listed in Spatial Principle 7, in particular criteria c) to e), and paragraph 11 of the NPPF:

- GNO18 (**East of Knightley Road**; 77 homes) – appears not to be subject to any headline environmental constraints, and relates well to the existing settlement edge. Also, there is footpath connectivity to the village centre, and the village GP surgery is near adjacent (where there is a bus stop). However, the site is located distant from the A518 corridor and primary school (about 1km from the site, via walking routes), such that development would lead to significant additional traffic passing through the village.

In **conclusion**, in addition to a scenario involving 109 homes at GNO02 and GNO04 (west)), it is reasonable to also explore a scenario involving additional allocation of GNO09 (south) in part. A higher growth option involving allocation of GNO18 is unreasonable because there would be insufficient capacity at the village primary school, and it is unlikely that an expansion could be viably delivered.

The latest [Strategic & Housing Land Availability Assessment Update 2024](#) identifies this site as GNO18. Furthermore in terms of education provision, Staffordshire County Council provided analysis as at February 2022 relating to Gnosall, which should be updated to confirm the current capacity position based on the published document via the web-link below:

[SBC Potential Site Options Response, January 2022](#)

It should be noted that the site is located within the Cannock Chase Special Area of Conservation (SAC) 15km zone of influence, so as such a developer contribution based on 80 residential unit should be sought.

With regards to Design, NPPF paragraph 11 and section d ii including footnote 9 it is clear that the presumption in favour of sustainable development aligns to this application for the achievement of well-designed places. It is therefore explicit that to secure support, the proposed development must deliver good quality design in accordance with Stafford Borough Local Plan policy N1, the Stafford Borough Council Design SPD and the National Design Guide. Furthermore Policy C2 sets out an affordable housing requirement of 40% for Gnosall.

The proposed new housing development of 80 new dwellings adjacent to Gnosall and beyond the Key Service Village's settlement boundary is classified as 'major' development and is a 4.1% increase in scale for Gnosall in the sustainable settlement hierarchy of the adopted Plan for Stafford Borough 2011-2031. This is considered acceptable within the context of Spatial Principle 7 criteria a) and b). It is noted that Stafford Borough Council does not have a 5 year housing land supply and the adopted Plan is more than 5 years old meaning that the NPPF paragraph 11 presumption in favour of sustainable development applies. Nevertheless taking into account NPPF paragraph 11 and the full weight of Spatial Principle 7 criteria c) to e), at this stage the planning policy position is not to support planning consent for this proposed development until education and transport infrastructure requirements have been addressed by the applicant.

This should be noted alongside other material considerations that will be taken into account in the overall planning balance in determining the application. Therefore the advice provided is the Planning Policy perspective and DM Officers will take a balanced approach to decision-making.