



Woodford Neighbourhood Forum

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Ms Jane Chase
Planning Officer
Stockport Metropolitan Borough Council
Town Hall, Edward Street
Stockport
SK1 3XE

12th December 2019

Dear Ms Chase

Reference: DC/075212

Proposal: This outline application is for 4no 2 bedroom bungalow dwellings on the plot behind Flora Cottage (Flora Cottage will be retained), utilising existing site access from the highway (access, layout and scale to be determined with appearance and landscaping reserved).

Location: Flora Cottage, 438 Chester Road, Woodford, Stockport, SK7 1QS

As a consultee, Woodford Neighbourhood Forum would like to make the following comments on the above planning application.

Firstly, we have assessed the proposals against the criteria in the Woodford Neighbourhood Plan and feedback from consultation with residents during preparation of the WNP.

Then we have assessed the proposals against national and SMBC policies.

1. Woodford Neighbourhood Plan is now part of the Stockport Development Plan

Assessment: We are disappointed to note that WNP policies have not been acknowledged in the proposal. The following policies are relevant:

1.1. **WNP ENV4**, which states that development should, where viable and deliverable, achieve net gains in biodiversity.

Assessment: The proposal does not appear to include suggestions for net gains in biodiversity or mitigation for the removal of a pine tree, but space and opportunity for this may be very restricted. Some mitigation is needed by way of a landscaping scheme, if permission is to be granted.

1.2. **WNP DEV4:** Design of new development, which states that all new development in Woodford Neighbourhood Area should achieve a high standard of design. New residential development proposals should demonstrate how they respect and respond to the Neighbourhood Area's rural character, to its ecology and to its landscape. Where appropriate and viable, the development of sustainable drainage systems, the retention and enhancement of landscape, wildlife and ecological networks and the achievement of high environmental and energy standards will be supported.

Assessment: Compliance with DEV4 cannot be assessed because no information has been submitted with regard to the appearance of the proposed houses.

Additional comments

- Responses to WNF consultation with residents in 2014 indicated that the majority of residents wanted any extensive new development to be confined to the aerodrome site. However, they indicated that more 2-bedroomed, market-priced properties would be welcomed in the neighbourhood area. Therefore, the change in the proposal from 3-bedroomed to 2-bedroomed properties is welcome and may fulfil an unmet need. We also have anecdotal evidence that more bungalows are needed for older people. However, these properties are chalet bungalows with stairs to bedrooms in the roof space, which will limit their suitability for older people.
- The proposal will need to be assessed for any traffic safety issues. We note that several properties will access the main road via the same access road near to the entrance to Budgens store and opposite one of the entrances to the Redrow site. It would be preferable if all vehicles are able to turn within the site and leave in a forward direction.
- The proposal for four properties is considered to be over-development. If new development in this location is considered policy compliant, then three properties would be preferable.

2. NPPF

The site is in Green Belt and therefore the following policies in the NPPF are relevant:

2.1. NPPF paragraph 143, which seeks to prevent harm to the Green Belt.

Assessment: We note that impairment of the openness of the Green Belt has been addressed by the reduction in the height and volume of the revised proposal compared with the previous application. The applicants state that it now represents less volume than the existing buildings. Sight lines to open fields have also been improved. However, we also note that NPPF paragraph 143 states that the construction of new buildings in the Green Belt is inappropriate development (also see notes against NPPF paragraph 145 below).

2.2. NPPF paragraph 144, which advises Planning Authorities to give substantial weight to any harm caused to the Green Belt and notes that special circumstances only exist where any harm is outweighed by other circumstances.

Assessment: Whether the application fulfils any unmet need not met by the very extensive development on the aerodrome site will need to be carefully assessed. See comments in section 1.

2.3. NPPF paragraph 145, which states that the local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this include:

g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:

- not have a greater impact on the openness of the Green Belt than the existing development; or
- not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.

Assessment: This proposal is for partial redevelopment of previously developed land.

- This is an outline application with some matters reserved for subsequent approval, so any detailed assessment of the impact on the openness of the Green Belt would be problematic at this outline stage.
- It does not meet the requirement to “contribute to meeting an identified affordable housing need within the area of the local Planning authority”. There is no reference to affordable housing in the submission.

Within the Design and Access Statement accompanying the application there is the developer’s evaluation of the proposals (page 6). We disagree with the interpretation of NPPF paragraph 145(g) set out there. Paragraph 145 (g) does not state “the infilling, partial or complete redevelopment of previously developed land which would not have a greater impact on the openness of the Green Belt than the existing development is appropriate in the GB’. This is a misinterpretation of the requirements of 145 (g). We would request further information regarding the appearance and landscaping of the development in order that a full and accurate assessment can be undertaken by the Borough Council and the Forum. Any assessment of the impact of openness for a development of this scale in the Green Belt is limited without this additional material.

3. Saved policies of the SUDP 2006

We have identified the following policies as relevant for the proposed development as follows:

3.1. GBA1.1. Extent of Green Belt, which includes Woodford in the extent of the Green Belt.

Assessment: The Green Belt status of the site is acknowledged in the proposal.

3.2. GBA1.2. Control of Development in Green Belt, which list criteria for the control of development within Green Belt.

Forms of development other than new buildings, including changes in the use of land, will not be permitted unless they maintain openness and do not conflict with the purposes of including land in the Green Belt. Proposals for the re-use of buildings will be assessed against the provisions of Policy GBA1.6.

Assessment: The proposal fails to comply because it is not re-use. The cottage would remain, all other buildings would be demolished and a new housing development would be built.

3.3. GBA1.5. Residential Development in Green Belt, makes it clear that new residential development is not normally acceptable in the Green Belt. The policy clarifies that minor domestic development and certain forms of residential use may be acceptable and not in conflict with the purposes of Green Belt policy.

Assessment: The proposal fails to comply with this policy.

3.4. Design of Residential Development SPD paras 8.5 to 8.10, which outline the potential problems associated with backland development.

Assessment: The proposal is an example of backland development. Responses to WNF consultation with residents in 2014 indicated that nearly 70% were opposed to backland development. While, this is a previously developed site with existing buildings and the revised proposal with lowered roof lines would have little visual impact on the street scene, a question remains over whether a proposal for 4 dwellings in this location represents over-development.

2.4. LCRI1.1, which does not permit development in the countryside unless it protects or enhances the quality and character of the rural area. It notes that development should be sensitively sited, designed and constructed of materials appropriate to the landscape character area in which it is located.

Assessment: No details of appearance have been submitted. Therefore, the proposal does not comply with this policy.

4. LDF Core Strategy/Development Management policies

4.2. CS4 Distribution of housing (includes three policies H-1, H-2 and H-3)

H-1: Design of Residential Development which require high quality design and build standards, which respond to the townscape and landscape character of the local area, reinforcing or creating local identity and distinctiveness in terms of layout, scale and appearance and a range of other material factors.

Assessment: This cannot be assessed because no information has been submitted with regard to the appearance of the proposed houses.

4.3. CS8: Safeguarding and improving the environment, which concerns matters of the historic and natural environment.

Assessment: The loss of the pine tree is a concern. Some mitigation is needed by way of a landscaping scheme if permission is to be granted

4.4. CS8 SIE-1: Quality Places, which emphasises the need for good quality design which is reflective of national policy.

Assessment: This cannot be assessed because no information has been submitted with regard to the appearance of the proposed houses.

Summary

In summary, we believe that the revised proposal is an improvement on the former proposal, and would supply 2-bedroomed, market price houses, which meet a need that was identified in our consultation survey. However, we believe the proposal does not comply with the following policies:

1. GBA1.2 and GBA1.5 in the SUPD 2006
2. CS2 Housing provision; CS4 Distribution of housing Including H-1 Design of residential development and CS8 Safeguarding and improving the environment in Core Strategy parts of the Development Plan
3. DEV4 and ENV4 in the Woodford Neighbourhood Plan

We were pleased that an improved outline plan was proposed, but were disappointed that it was not a fully detailed application. Sight of the proposed design of the revised dwellings may have produced a more positive response to that aspect.

Yours sincerely,



Evelyn Frearson

On behalf of Woodford Neighbourhood Forum Management Committee