

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

8th January 2020

Dear Ms Chase

Reference: DC/075538

Proposal: Demolition of existing club house/driving range buildings and erection of eight dwellings with associated landscaping, parking and access

Demolition of existing club house/driving range buildings and erection of eight dwellings on the same footprint with associated landscaping, parking and access

Location: 181 Woodford Road, Moored Golf Range, Woodford Road, Bramhall, Stockport, SK7 1QE

As a consultee, Woodford Neighbourhood Forum have assessed this application against relevant planning policies and concluded that the proposals are in conflict with a number of national and local policies, which could set an unwelcome precedent for change of use of other recreational facilities.

1. Assessment against NPPF, February 2019

1.1. Paragraph 97 states:

“Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.”

Assessment: The land at Moored Golf Range currently functions as recreational land and open space. This would be lost on the site of the proposed housing development. The applicant points out that work on the A6MARR disrupted use of the site, but it is not clear whether former usage levels would have returned in time following completion of the road works. It is not clear whether the remaining land on the Moored Golf Range would continue in recreational use. The physical and mental benefits of outdoor recreation are now well established and WNF wishes to ensure that opportunities are retained and enhanced.

The proposal is in conflict with NPPF paragraph 97.

1.2. Paragraph 145 states:

“A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are:

- a) buildings for agriculture and forestry;
- b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;

- c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
- d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- e) limited infilling in villages;
- f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and
- 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: The proposal does not meet any of the criteria listed above as exceptions for the construction of new buildings in the Green Belt. The Golf Club house was a permitted use in Green Belt under clause b). It has been stated that, because the Golf Club house is a permanent building, it constitutes previously developed land and therefore demolition and replacement with residential dwellings is policy compliant. We do not believe that this is in the spirit of paragraph 145 of the NPPF. Indeed, to allow such a change of use in Green Belt would set a precedent for the change of use of other sporting club houses in Green Belt, such as Bramhall Cricket Club house, or Woodford Cricket Club house, which following the same arguments could also be described as “permanent” buildings and therefore previously developed land.

There is potential for development creep if a new club house was granted permission on the remaining open land, subsequently deemed previously developed land and then demolished to make way for further dwellings.

The proposal is in conflict with NPPF paragraph 145.

2. Stockport Unitary Development Plan 2006

2.2. L1.1 ‘Land for Active Recreation’ sets out that proposals which involve the loss of public or private sports grounds will not be permitted except where the proposed development would provide facilities of sufficient benefit to sport and recreation to outweigh the loss. Development of land currently or last used as playing fields will not be permitted unless; ‘The playing fields that would be lost as a result of the proposed development would be replaced by a playing field or fields of equivalent or better quantity, quality, usefulness and attractiveness in allocation at least as accessible to current and potential users’.

Assessment: The Golf Driving Range is private land for active recreation and we have not seen a proposal to replace or enhance the facility. As stated above, the physical and mental benefits of outdoor recreation are now well established and WNF wishes to ensure that opportunities are retained and enhanced.

The proposal is in conflict with Stockport UDP L1.1.

2.3. GBA1.2 presumes against the construction of any new buildings in the Green Belt unless the proposal lies within a list of four exceptions set out in earlier Government guidance

Assessment: The proposed development does not meet the criteria of any of the four exceptions.
The proposal is in conflict with Stockport UDP GBA1.2.

2.4. GBA1.5 states that residential development in the Green Belt will be restricted to agricultural dwellings, re-use of buildings and limited infilling/redevelopment of Major Existing Developed Sites.

Assessment: The proposed development does not fall within any of those exceptions.
The proposal is in conflict with Stockport UDP GBA1.5.

3. Assessment against Woodford Neighbourhood Plan (WNP)

Woodford Neighbourhood Plan 2019 is part of the Development Plan for Stockport Council following the completion of the appropriate stages of the Plan. As a recently made Plan, it is fully compliant with current national and borough planning policies and now carries weight in the decision making process on planning applications. We have assessed the proposals against the policies in the WNP.

Development

DEV1: Limited infilling

“Limited infilling in the Neighbourhood Area, comprising the development of a relatively small gap between existing dwellings for one or two dwellings, will not be inappropriate development in the Green Belt, subject to such development respecting local character. Limited infilling should comprise the completion of an otherwise continuous and largely uninterrupted built frontage of several dwellings visible within the street scene where the scale of development is compatible in character to that of adjoining properties. Limited infilling should be built along similar building lines as adjoining properties.”

Assessment:

The proposal cannot be classed as limited infilling of a relatively small gap between existing dwellings for one or two dwellings. The proposal does not meet the criteria for WNP DEV1.

Neither can the proposal be classed as redevelopment of previously developed land because the erection of the golf club house was permitted for outdoor sport under NPPF paragraph 145 clause b), which states:

“the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;”

The proposed new residential use of this site is in conflict WNP DEV1.

DEV4: Design of new development

“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: WNF has concerns that the proposal to excavate in order to create dwellings with two storeys could create a flood risk.

Poor surface drainage is a serious problem in many areas of Woodford due to the topography and soil type, including that at this site. Surface flood risk is shown on the map in Figure 2 from <https://flood-warning-information.service.gov.uk/long-term-flood-risk/map>

As the atmosphere is becoming warmer and a warmer atmosphere holds more water, climate change models predict more frequent bouts of intense rainfall in this part of the country.

During the preparation of the Woodford Neighbourhood Plan the Environment Agency provided the following information:

The Environment Agency notes that the Contamination and Flood Risks should be taken into account when considering any development.

Contamination Risk

Due to potential former land use(s), soil and /or groundwater contamination may exist at any site where development is proposed. Associated risks to controlled waters can be addressed by:

- Following the risk management framework CLR11 (15)
- Referring to the Environment Agency guiding principles for land contamination (16) and the land contamination sections in the Environment Agency's Groundwater Protection: Principles and Practice (17)

Further information may be found on the land contamination technical guidance pages on the direct.gov website (18)

Flood Risk

Developments may require a permit under the Environmental Permitting (England and Wales) Regulations 2016 from the Environment Agency for any proposed works or structures, in, under, over or within eight metres of the top of the bank of a designated 'main river'. This was formerly called a Flood Defence Consent. Some activities are also now excluded or exempt. A permit is separate to and in addition to any planning permission granted. (19)

Further to consultation with the Environment Agency, the Neighbourhood Forum would like to see new development being designed to maximise the retention of surface water on the development site and measures to minimise runoff; for surface water drainage to be considered in liaison with the Local Lead Flood Agency, the public sewerage undertaker and the Environment Agency; and for surface water to be discharged in the following order of priority:

- An adequate soakaway or some other form of infiltration system.
- An attenuated discharge to watercourse or other water body.
- An attenuated discharge to public surface water sewer.
- An attenuated discharge to public combined sewer

Environment

ENV2: Enhancing public rights of way

"The enhancement of public rights of way throughout the Neighbourhood Area will be supported."

If the proposal is granted permission, an outdoor recreational amenity is will be lost. Open space surrounding the site will remain and we suggest that the potential to create a public right of way through the site to connect up existing footpaths could be explored: 11HGB, 14HGB, 15HGB and FP75. See figure 1.

Some of these have been/will be disrupted by A6MARR and Poynton Relief Road but have been/will be re-instated.

Assessment: Introduction of a new public right of way to connect with 11HGB, 14HGB, 15HGB and FP75 would compensate for loss of an outdoor recreational facility and ensure compliance with WNP ENV2.

ENV3: Protecting Woodford's natural features

"The protection and/or enhancement of Woodford's natural features, including those identified in the Table below, will be supported."

Access was denied for the Woodford Landscape and Environment Survey for the Neighbourhood Plan, but analysis of satellite images suggested that coniferous trees and hawthorn hedges are present on the land. Our observations are consistent with the findings of the Ecological Survey undertaken by Dunelm Ecology. WNF would like to see enhancement of natural features on the site and surrounding land, including native trees and hedges. Suggestions have been made by Dunelm Ecology on pages 14 and 15 of their report.

Assessment: In order to comply with WNP ENV3, landscaping should retain native trees and hedges wherever possible. Full landscaping proposals with appropriate species are required if planning permission is to be granted.

ENV4: Supporting biodiversity

“The conservation, restoration and enhancement of biodiversity, including that found in open spaces, trees and hedgerows, in order to promote and support wildlife and other forms of biodiversity will be supported. Development should, where viable and deliverable, achieve net gains in biodiversity.”

Assessment: Landscaping should aim to not only retain but also enhance biodiversity where possible. We recommend the introduction of native trees, hedge species on the development site, in line with the suggestions made by Dunelm Ecology on pages 14 and 15 of their report. Improvements in natural features could also include the wider land area of the former farm/golf driving range, which could include small areas of native woodland and ponds for surface drainage and enhanced biodiversity.

Community

COM2: Development of Community Facilities

“Development should not result in the loss of an existing community facility, including any of the Features of Value to the Community listed below, unless it can be demonstrated that the harm arising from any such loss would be mitigated by the provision of an equal or greater benefit to the community.”

Assessment: The golf driving range had value to the community as an outdoor recreational facility. No evidence has been submitted to justify the loss of this community facility. **The proposal is in conflict with WNP COM2.**

Summary

- The proposal is in conflict with NPPF paragraph 97
- The proposal is in conflict with NPPF paragraph 145
- The proposal is in conflict with Stockport UDP L1.1
- The proposal is in conflict with Stockport UDP GBA1.2
- The proposal is in conflict with Stockport UDP GBA1.5
- The proposal is in conflict with WNP DEV1
- The proposal raises concerns with WNP DEV4
- We have suggestions for compliance with WNP ENV2
- We have suggestions for compliance with WNP ENV3
- We have suggestions for compliance with WNP ENV4
- The proposal is in conflict with WNP COM2
- There is potential for development creep, if a new club house was granted permission on the remaining open land, subsequently deemed previously developed land and then demolished to make way for further dwellings.
- The development of the A555 road and its proposed route have been known for many years. It could have been anticipated from the outset that completion of the road would potentially have a negative impact on the Moored Golf Range and taken into consideration in development of plans for that business.
- If this proposal were to go ahead it would set an unwelcome precedent for future development of other sports club houses, which form valuable community assets to the community and surrounding areas.

With regards,

Evelyn Frearson
On behalf of the WNF Management Committee

Figure 1. Footpaths in Woodford

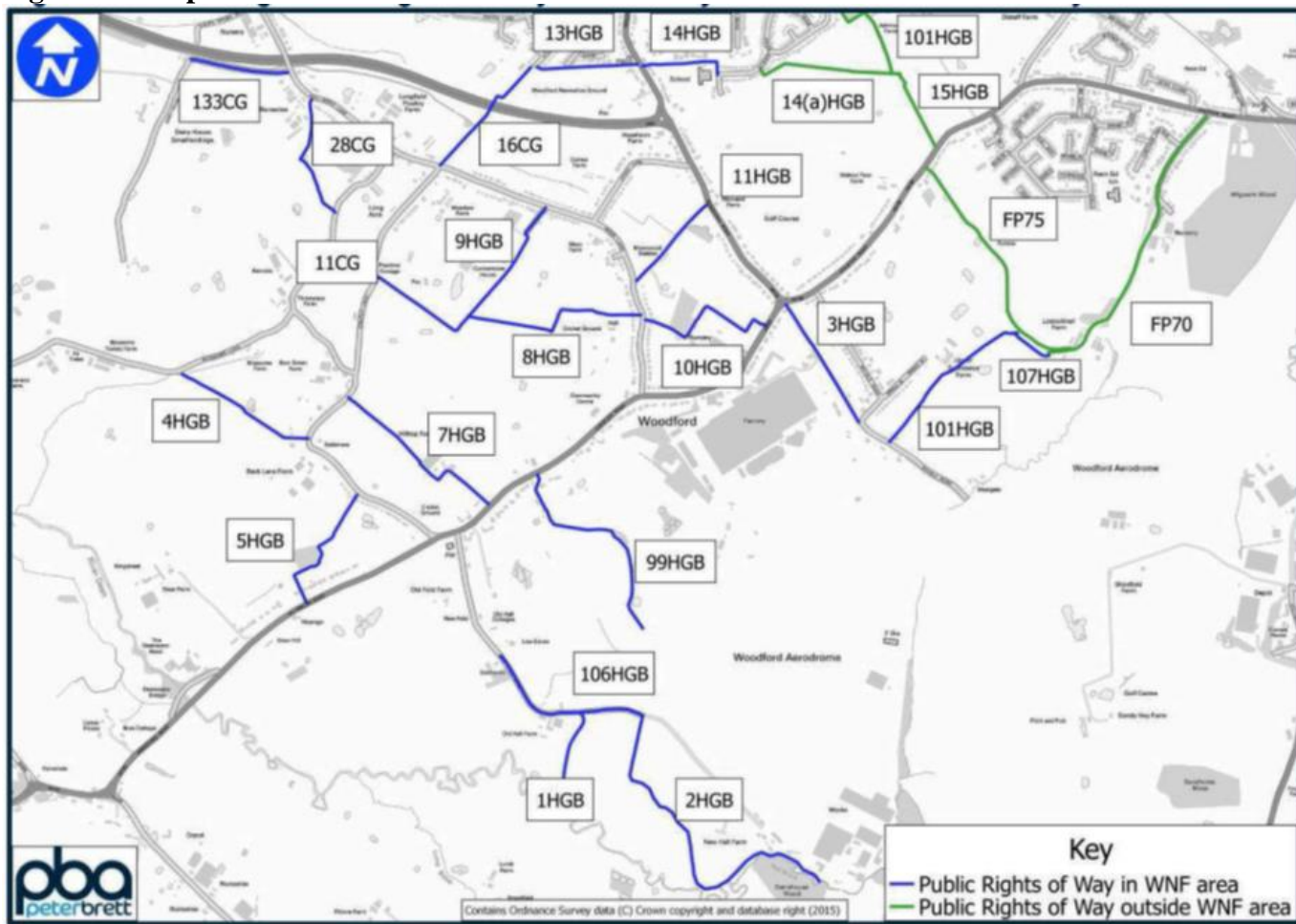


Figure 2. Surface flood risk at Moorend Farm

