



Woodford Neighbourhood Forum

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

1 May 2020

Dear Ms Chase,

Reference: DC/076419

Proposal: Outline application for the siting of two affordable housing buildings with access points off Woodford Road. (Resub of DC071255)

Location: Land Adjacent To 200 Woodford Road, Woodford, Stockport

1. General Comments and Concerns

- 1.1. We are disappointed that none of the supporting material for this application refers to the Woodford Neighbourhood Plan (WNP) prepared by Woodford Neighbourhood Forum (WNF), which is part of the Stockport Development Plan following its successful examination and referendum in 2019. The WNP is the most recent, most local and up to date part of the Development Plan with regard to this application.
- 1.2. Paragraph 2.12 of the Preliminary Landscape and Visual Appraisal (PLVA) states that the Site lies within Allocation OA20 Woodford (Stockport) in the Draft Greater Manchester Spatial Framework (October 2016) and Figure 2 shows the site included within the then proposed housing Allocation. This statement is very out of date because the 1st draft was superseded by a 2nd draft for consultation in 2019, which does not include OA20. More importantly GMSF was not then, and is not now, part of adopted planning policy.
- 1.3. We welcome the fact that the PLVA has acknowledged the Woodford Landscape Character Area. However, we note that it does not refer to the [Woodford Heritage and Character Assessment](#) carried out by AECOM for the Neighbourhood Plan on behalf of WNF, which can be found on the WNF website. This notes that unsympathetic development could result in a reduction in openness, loss of historic features or mature vegetation and have incremental impacts on the key characteristics of the area.
- 1.4. The proposal is located in a sensitive area of the village, within an area of green, open space between Woodford Road and Moor Lane, which contributes significantly to the character and openness of the village. Native hedges surround the site. An adjacent footpath, known as the Cinder Track, is lined by native hedges and trees as it passes between fields to connect Woodford Road and Moor Lane. The track is much used and loved by residents. Consultation with residents during the preparation of the Woodford Neighbourhood Plan revealed that the majority

who responded treasured such green, open spaces and gaps in the housing lines, and wanted them to be protected. Views over fields in Woodford that are important to residents are shown in Appendix section 3.

- 1.5. We understand that Affordable Housing is an exception to the restrictions on development in Green Belt and does not need to meet the criteria for Infilling. We also note that any proposals for market housing on this site would not meet the criteria for limited infilling in WNP DEV1 and would fail to comply with that policy.
- 1.6. The submission provides very little detail about the type of Affordable Housing proposed, which means that it is difficult to assess from a design perspective, or in terms of the potential impact on the openness of or impact on the Green Belt.
- 1.7. The submission addresses affordability issues at a Borough wide scale, but there is no assessment of affordable housing needs within the Woodford area.
The [Neighbourhood Plan Housing Policy Advice](#) produced for WNF by AECOM in 2014 provided useful information on the requirement for Affordable Housing in Woodford. Relevant extracts are shown in Appendix section 1. At the time of writing, the report noted that there were just two applicants on the local housing waiting list that had an application address in Woodford and the authors concluded that there did not appear to be a significant demand for affordable housing within the village. An assessment of the need for Affordable Housing in Woodford, over and above that which will be provided on the aerodrome site, would be useful in assessing this application.
- 1.8. The drawings supplied with the application indicate bedrooms which are larger than the standard size for affordable housing. Furthermore, we note that the layout does not comply with Building Regulations because the stairs should be protected by a lobby around the front doors of the apartments.
- 1.9. We note that drawings shown in the Proposed Site Plan differ from those shown in the Arboriculture Impact Assessment (AIA Woodford), which dates back to September 2018. In the former there is one entrance, while in the latter there are two.
- 1.10. We note that the one entrance shown in the Proposed Site Plan for six dwellings is opposite to the entrance to the development of eight new dwellings, which now has planning permission. Traffic safety issues arising from the close proximity of these access points on the busy A5102 would need to be assessed.

2. Woodford Neighbourhood Plan

We have assessed the proposal against relevant policies in the neighbourhood plan.

2.1. WNP 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

This outline application is located within a very sensitive area of the Green Belt due to its siting and character as described in section 1. This is confirmed within Figure 1 of the Preliminary Landscape and Visual Appraisal document accompanying the application rather

than the site and location plans which are overly site specific in regard to key Planning factors. Given the nature and potential impact of the proposed development on many planning factors (as set out in DEV4), the submission is incomplete. Insufficient information has been submitted with the application relating to matters of size and scale, in order to assess the impact on landscape, and the Green Belt at this point. A full assessment is required in accordance with the requirements of the Neighbourhood Plan set out in policy DEV4.

As noted in section 1, the drawings supplied with the application indicate bedrooms which are larger than the standard size for affordable housing. Also, the layout does not comply with Building Regulations because the stairs should be protected by a lobby around the front doors of the apartments.

Accordingly, the proposal is contrary to Policy DEV4 of the WNP

2.2. WNP 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.”

Table showing Natural Features which are a key aesthetic component of the Woodford Landscape

1.	Trees in public places and bordering roads, in pavements and in grass verges along Chester Road, Wilmslow Road Bridle Road, Church Lane, Blossoms Lane, Moor Lane, and Hall Moss Lane
2.	Trees and woodland with Tree Preservation Orders or Ancient Woodland
3.	Mature & veteran trees described and /or marked on maps in the WNF Landscape and Environment Survey report (12)
4.	Grass verges with daffodils and wildflowers, such as bluebells
5.	Native hedgerows visible along roads, tracks and public rights of way across farmland (12)
6.	Ponds visible along roads, tracks and public rights of way across farmland (12)

Assessment

An ecology survey by Envirotech accompanies the application. It does not refer to the WNP or its supporting studies, which provide detailed local information, including the study provided by [Cheshire Wildlife Trust](#) and the [Woodford Landscape and Environment Study](#).

The proposal falls within Area 3 in the Woodford Landscape and Environment Study. The perimeter adjacent to the road is bounded by native hedgerow number 3H13, which contains more than four native species (species rich according to the Cheshire wildlife Trust definition). The species identified in the Envirotech ecology survey concur with our findings. See Appendix section 2.

Native hedgerows and trees are an important feature in Woodford village, which contribute to its semi-rural character. Native hedgerows visible along roads, tracks and public rights of way across farmland are listed as natural features for protection in WNP ENV1.

Therefore, removal or damage caused as result of this proposal and/or construction work would require mitigation to maintain natural vegetation and retain the rural character and value for biodiversity.

WNF welcomes the proposal to retain the native perimeter hedges. The introduction of woodland screening adjacent to the Cinder Track is also welcomed, provided that native tree species are used.

The recommendations described in section 7 of the Envirotech study are welcomed and should be enforced.

2.3. ENV4: Supporting biodiversity*

*The variety of plant and animal life in the world or in a particular habitat, a high level of which is usually considered to be important and desirable.

“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.”

Table of Key Habitats for wildlife as shown in the WNF Natural Features Map

1.	Native hedges, especially those which are species-rich
2.	Mature & veteran native trees
3.	Native woodland and copses
4.	Rough unimproved grassland
5.	Areas rich in wildflowers
6.	Ponds (permanent and seasonal)
7.	Ditches
8.	Streams (Handforth Brook, Grove End Brook and River Dean)
9.	Rivers (River Dean)

Assessment

The proposal lies within an area identified by the Cheshire Wildlife Trust as having Medium Habitat Distinctiveness. See Appendix section 4. Native hedges, native woodland and unimproved grassland are listed in WNP ENV4 as key habitats for wildlife for conservation. As noted in the Envirotech study, all hedgerows are classified as a UK BAP habitat.

The recommendations for mitigation, including enhancement of the brook as a wildlife corridor, retention of as much of the native hedgerows as possible and protection of the roots of neighbouring trees, as described in section 7 of the Envirotech study are welcomed and should be enforced, but this is a very minimal approach to the enhancement of biodiversity.

3. Compliance with National Planning Policy Framework (NPPF 2019) relevant sections:

As requested, we have focussed on assessment against the Woodford Neighbourhood Plan. However, we noticed the following issues with regard to compliance with the NPPF.

3.1. Planning obligations

NPPF Para 6 states: *Planning obligations must only be sought where they meet all of the following tests:*

- a) necessary to make the development acceptable in planning terms;*
- b) directly related to the development; and*
- c) fairly and reasonably related in scale and kind to the development.*

Comment: Criterion (a) could be met if the development meets para 145 (below) as the whole site lies in the Green Belt. Criterion (b) is met as the section 106 agreement is directly related to the development. Criterion (c) is not met in the submission as insufficient information accompanies the application to demonstrate that this criterion is met. The most recent requirements for affordable housing within Stockport Council are set out in the Council document “Affordable housing requirements in Stockport Explanatory note dated September 2018”. Many requirements are not met in the planning submission. The section of the Council document headed Conditions and Planning Obligations states as follows:

The wording of conditions and planning agreements / obligations will vary depending on the circumstances of each case. The Council will require a draft heads of terms to be submitted at point of validation. This helps to reduce any unnecessary delays during the consideration of the application. Planning permission is issued once the agreement has been signed and sealed. Matters to be covered in a planning agreement will include clauses to:-

- Set out the requirement for affordable housing at the outline or full application stage;*
- Ensure dwellings are transferred to a RP at the specified affordable price or are made available to qualifying persons in housing need at the affordable price;*
- State the number of units and show their location on a plan;*
- State the specification of the dwellings to be transferred to an RP;*
- Ensure the provision of a financial contribution in lieu of actual housing units (where this approach is both acceptable to the Council and the Developer);*
- Ensure the affordability of rented accommodation in perpetuity;*
- Ensure proper control is exercised over the occupancy in perpetuity;*
- Ensure any re-sales retain the element of affordability in perpetuity;*

- *Prevent completion / occupation of the general housing until the affordable housing has been built / occupied.*

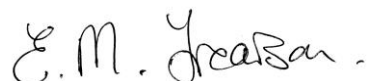
The draft Heads of terms for the section 106 agreement submitted with application DC/076419 fails to meet a number of these clauses. The Planning and Affordable Housing Statement accompanying the application refers at 4.3 to the updated Housing Needs Assessment (HNA) (2019) and an Affordable Housing Requirements in Stockport Document (2018) which together provide updated evidence regarding affordable housing need. There is however no attempt to assess the application against the section 106 criteria set out in the HNA.

4. Summary

In summary we believe that the application should be refused for the following reasons:

- The location of the proposal is sensitive to change and would represent loss of open green space, which makes an important contribution to the character of the village.
- Assessment of the requirement for additional Affordable Housing in Woodford, over and above that provided on the aerodrome site, has not been supplied.
- The outline planning application does not provide sufficient detail about the type and design of affordable housing proposed to permit assessment of the proposal against WNP DEV4.
- The drawings supplied with the application indicate bedrooms which are larger than the standard size for affordable housing and a layout which does not comply with Building Regulations.
- The outline case put forward by the applicant to justify inappropriate development in the Green Belt does not constitute very special circumstances sufficient to outweigh the harm by reason of inappropriateness and any other harm to the Green Belt. Therefore, the proposal is contrary to section 13 of the NPPF through conflict with national policy for the Green Belt.
- Access to the site from a busy main road and opposite to the entrance to eight new dwellings at Moored Golf Range is potentially hazardous and need assessing from a traffic perspective.

Yours sincerely,



Evelyn Frearson

On behalf of Woodford Neighbourhood Forum Management Committee

Appendix

1. Extracts from Neighbourhood Plan Housing Policy Advice (AECOM)

45. The assessment showed that 3,119 concealed households over the next three years require affordable housing in Stockport. This equates to 1,419 concealed households intending to move to Stockport Homes rented accommodation, 1,630 to housing association rented accommodation and 70 to housing association shared ownership accommodation. The Bramhall/Cheadle Hulme (South) and Woodford area was not a particularly popular location in terms of where concealed households would like to live (the area was seventh out of the eleven sub areas).

64. Planning permission was granted relating to both the outline and full applications in January 2015. The approved application consists of up to 950 dwellings. In terms of the provision of affordable housing as part of the development, the following is stipulated within the [accompanying] Section 106 agreement:

- 15.5% of the residential units (which represents around 148 units) will be provided as affordable housing of which the tenure mix will be 50% Affordable Rent and 50% Intermediate Housing unless otherwise agreed with the Council. These units will be provided as affordable housing for sale or rent to persons who cannot afford to rent or buy houses generally available on the open market and which should meet the needs of eligible households.

82. The Council was not able to provide an indication of how many people would like to live in Woodford as this information is only available when people bid for vacant and available properties in an area. However, the Council confirmed that 2 applicants on the register have an application address in Woodford. It can be concluded from this that the local affordable need for Woodford is two and that there is not a significant demand for affordable housing within the village.

153. A further potential scenario is to rely on the future housing need for Woodford Neighbourhood Plan Area to be satisfied by the Woodford Aerodrome development. Around 950 homes are to be developed on the site over the next 9 years, including 15.5% affordable housing and self-contained extra care units. Further consultation with residents by the Forum is required to establish whether, there is a preference for housing developed as part of the Woodford Aerodrome development (especially for smaller properties/bungalows) to be complemented by a small amount of limited infill development within Woodford.

163. Based on the data summarised on the quantity of dwellings required and the market factors affecting those quantities, as well as the results of the Initial Public Engagement, AECOM recommends that housing need for the Woodford in the period 2011-2026 is in the range of **20 to 25** net additional dwellings.

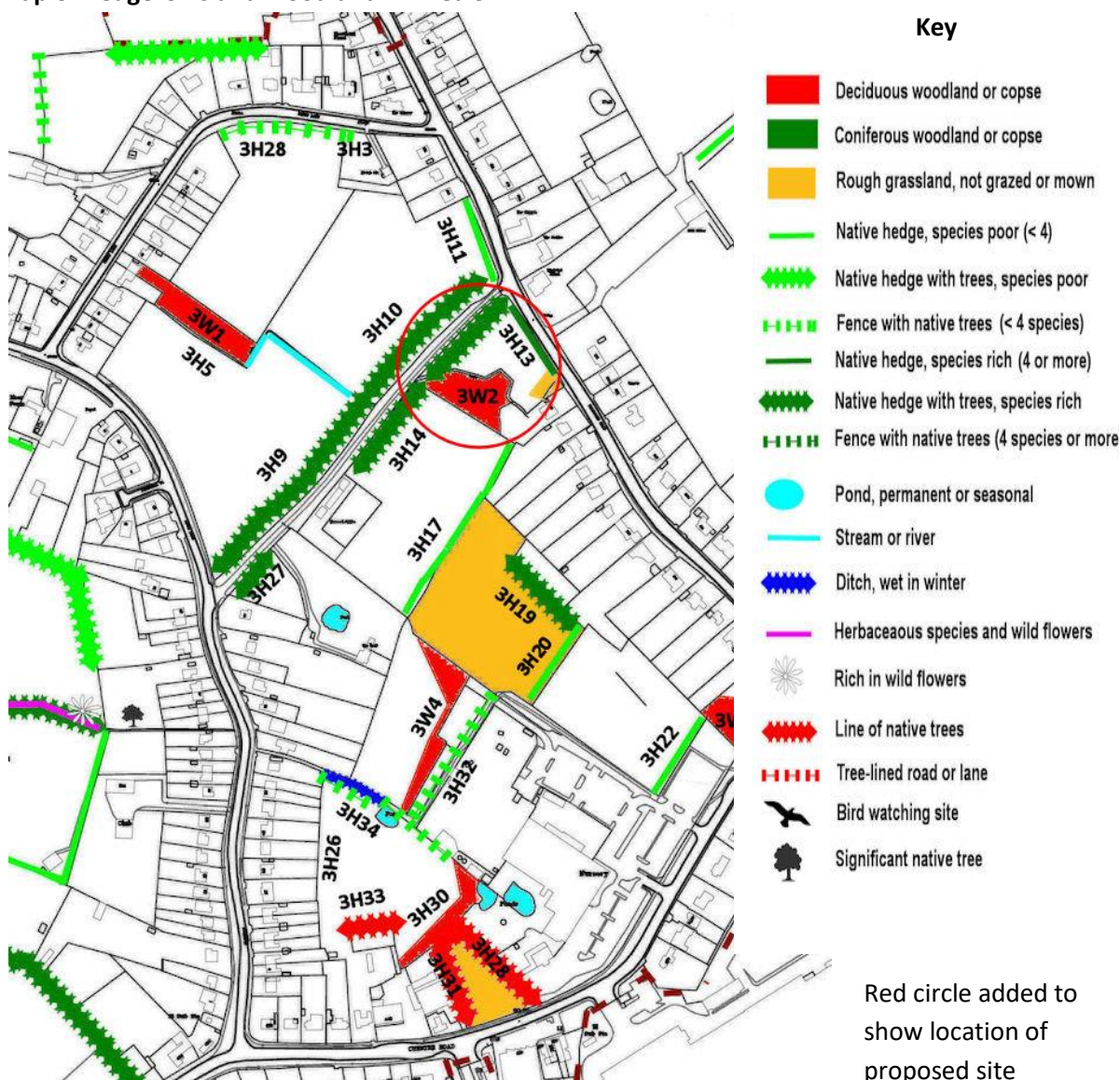
Table 22:

There are 2 applicants on the local housing waiting list that have an application address in Woodford. **There does not appear to be a significant demand for affordable housing within the village.**

Stockport's own requirement for affordable housing should result in adequate provision; therefore, there is no specific affordable housing policy required in Neighbourhood Plan. It should be noted that some affordable homes are being delivered as part of the Woodford Aerodrome development, which would provide affordable housing adjacent to the village.

2. Extracts from Woodford Landscape and Environment Survey

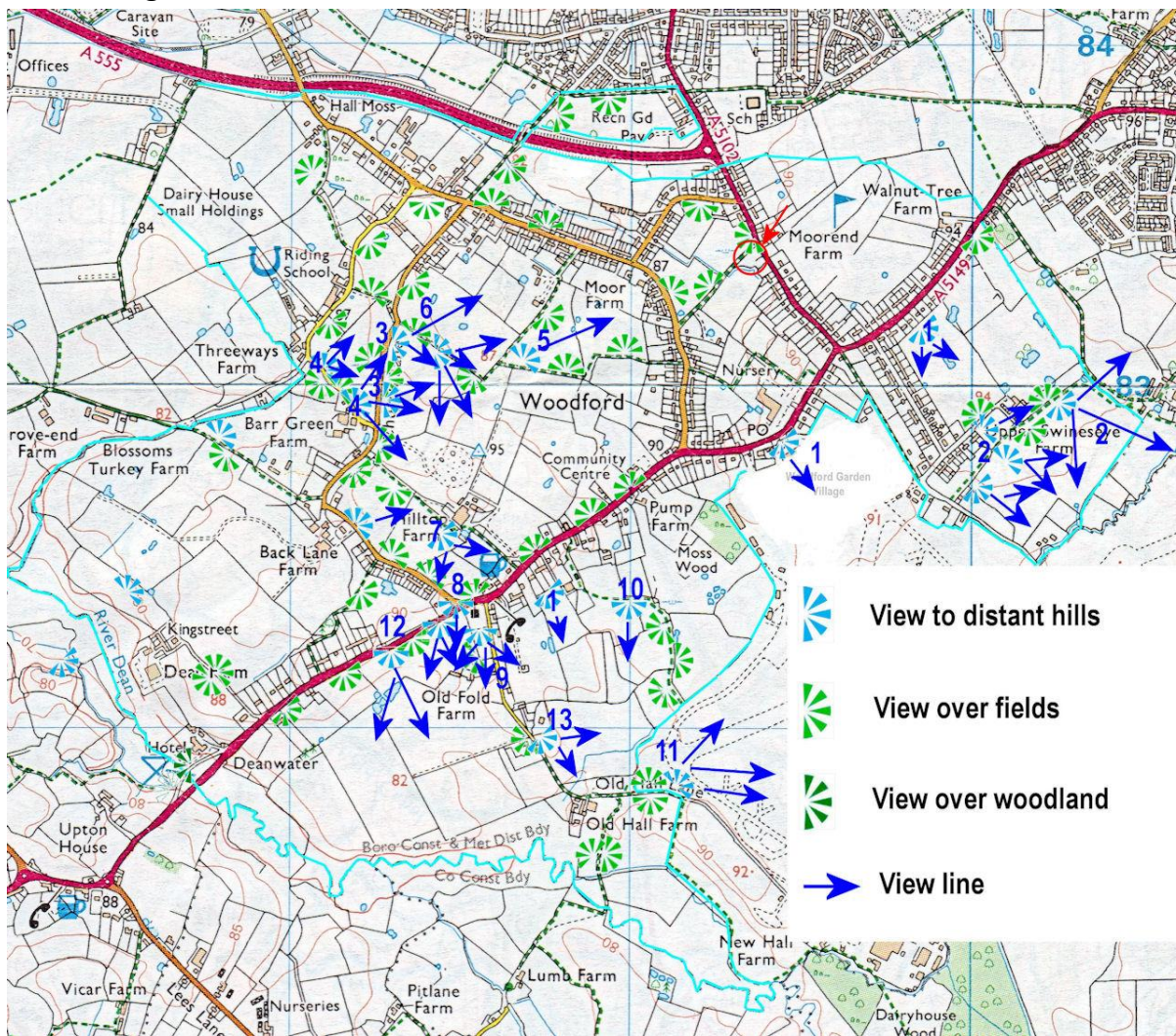
Map of hedgerows and woodland in Area 3



A larger map of the whole neighbourhood area can be viewed [here](#).

There are several native hedgerows in area 3, including 3H9, 3H10, 3H11, 3H13, 3H14, 3H17, 3H19, 3H20, 3H22, 3H27. Of these the following are species-rich, containing four or more species per 30 m, 3H9, 3H10, 3H13, 3H14, 3H19 and 3H27. Many of these species rich hedges also contained mature trees. Species found included alder, ash, beech, birch, blackthorn, briar, elder, willow, hawthorn, hazel, holly, horse chestnut, ivy, maple, oak, rowan, sycamore, cherry. The most common species were hawthorn, oak, blackthorn and elder. The Cinder Track (footpath 11HGB) is notable for species-rich hedges on either side.

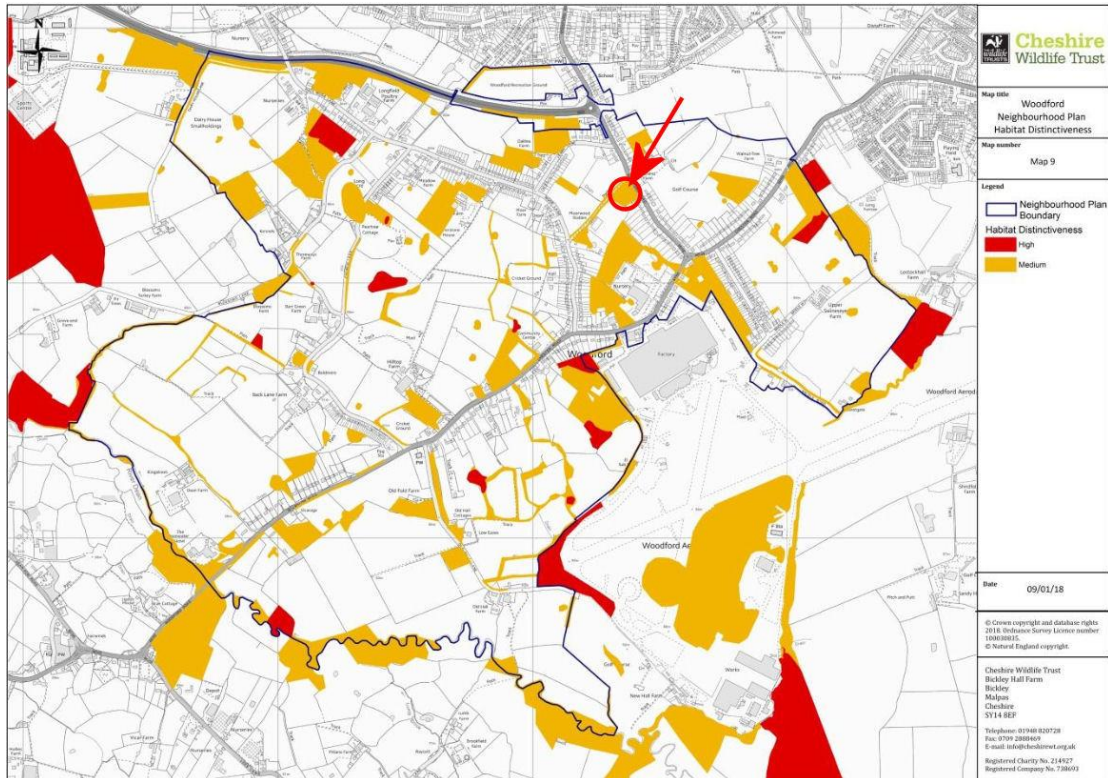
3. From WNP. Map showing Views and Vistas within and from the Woodford Neighbourhood Area



Click [here](#) for a larger view.

Proposal site marked with red circle and arrow.

4. CWT Map showing area of Habitat Distinctiveness (red indicates high level, orange indicates medium level). Reproduced with permission from Cheshire Wildlife Trust



The full report can be found [here](#).

Proposal site marked with red circle and arrow.