



Woodford Neighbourhood Forum

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

27th May 2020

Dear Ms Chase

Reference: DC/076482

Proposal: The demolition of existing agricultural buildings, the conversion of existing L shaped curtilage listed barn to form 4 dwellings, the existing detached curtilage [*curtilage*] listed barn to form 1 new dwelling, and the erection of 3 new-build dwellings with landscaping, access and associated works.

Location: Old Hall Farm, Old Hall Lane, Woodford

1. General comments and concerns

- There is no reference to the Woodford Neighbourhood Plan in the supporting documents.
- The site of three of the proposed dwellings does not meet the criteria for Previously Developed Land set out in Annex 2 Glossary of the current NPPF.
- The proposed development does not meet any of the tests for an exception to the presumption against inappropriate development in the Green Belt.
- The documents included with the application acknowledge that the site is in Green Belt, but do not address all the policy issues arising from this.
- A Planning Statement is not included in the supporting documents. The main supporting document is the Landscape and Visual Impact Assessment.
- The LVIA refers to a version of the NPPF which has been superseded.
- Old Hall Lane is very narrow (single track in places) and there is frequent traffic accessing the Avro Golf Course. At the lower end it becomes Public Right of Way 106HGB, which leads to 1HGB and 2HGB and is used by walkers and cyclists. Passing is difficult and, in places, cyclists need to dismount in order for vehicles to pass safely. This needs to be considered before any further development on Old Hall Lane is given planning permission.

Woodford Neighbourhood Plan

The application documents do not reference the Woodford Neighbourhood Plan 2019, or acknowledge that it is the most recent and local part of the development plan for the Woodford area and has substantial weight in terms of the balance of relevant Planning factors in the determination of this application.

The LVIA appears very thorough, but it has not acknowledged the [Heritage and Character Study](#), which provides supporting evidence for the WNP. This study includes the following in aspects of Woodford that are sensitive to change:

- Heritage assets and their settings
- The open views of the surrounding rural landscape and South Pennines beyond from within the settlement and PRow

We have assessed the proposal against policies in the Woodford Neighbourhood Plan (WNP).

2.1. WNP policy DEV1, which states:

“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 is not limited infilling. Therefore, we turn to the NPPF 2019 to assess whether the proposed development meets any of the other criteria for an exception to the presumption against inappropriate development in the Green Belt (see section 4).

2.2. 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 proposal is not compliant with the NPPF, so we have not assessed the design features. However, any proposed development on this site would need to comply with WNP DEV4.

2.3. WNP ENV1: Respecting views and vistas

“Development should respect local character. In doing so, it should recognise and take into account the importance of the views and vistas listed in the Table and indicated on the Map below.” See Appendix 9 for the Views and Vistas map from WNP.

Assessment

The LVIA accompanies the proposal acknowledges that proposed development will be visible from footpath 1HGB.

“It is recreational users, i.e. walkers and ramblers using public rights of way who are most likely to experience views, but these receptors are not likely to experience any substantially adverse visual effects. Cyclists, golfers and horse riders are unlikely to be affected by the proposal as their attention is most likely to be focused upon the activity they are pursuing.”

Views and vistas from footpath 1HGB are marked as important in WNP.

Extract from the views and vistas map in WNP



A greater volume of development compared with the existing buildings is proposed. Therefore, a careful assessment needs to be made on whether the proposal will have a greater impact on the vista over fields from footpath 1HGB and whether it complies with WNP EV1.

Should any development be permitted, we recommend that conditions include planting of native trees and hedges in strategic positions in order to provide screening and retain the rural character of the setting.

2.4. 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
4.	Grass verges with daffodils and wildflowers, such as bluebells
5.	Native hedgerows visible along roads, tracks and public rights of way across farmland
6.	Ponds visible along roads, tracks and public rights of way across farmland (12)

Assessment

Any native trees and hedges on the site of the proposal should be retained.

2.5. 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

Should any development on the site be permitted, we recommend that the conditions include the planting of native trees, hedges and flowering species to support pollinators. These could be planted strategically to provide screening as described in 2.3.

2.5. WNF COM3: Woodford Heritage assets

New development affecting a heritage asset, including the setting of the asset, should conserve or enhance the asset in a manner according to its significance.

Assessment

The proposals are in very close proximity to a listed building and need to be assessed for their impact on this heritage asset.

3. Flood risk

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”

4. Compliance with National Planning Policy Framework (NPPF 2019)

As requested, we have focussed on assessment against the WNP, but we also noted the following issues with compliance with local and national policies.

The site is in Green Belt and therefore subject to Green Belt policies in the NPPF 2019.

We note that the current NPPF is the version dated February 2019 rather than the version dated July 2018 referred to in section 2.6 of LVIA; the 2018 edition has been superseded.

4.1. Failure to comply with paragraph 145 of the NPPF

Paragraph 145 of NPPF is referred to (the same number for both 2018 and 2019 versions) in respect of Green Belt. The substance of paragraph is retained in that item 145 item (g) is essentially the same in confirming that an exception can be made to allow new buildings in the Green Belt provided the development meets the following criteria:

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;

The report however fails to refer to the definition of previously developed land (PDL) set out in Annex 2 Glossary of the current NPPF which states as follows:

“Previously developed land: Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.”

Land which is or was last occupied by agricultural buildings is a specific exclusion from paragraph 145 in terms of national planning policy. Therefore, the national planning position is that set out in the first line of paragraph 145 which states:

“145. A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt.”

The proposed development does not meet the tests for an exception to the presumption against inappropriate development in the Green Belt. The site’s status in Planning terms is confirmed in a number of sections of the LVIA for example at 2.1 which confirms that:

“The current proposal, for which planning approval is being sought, is for the demolition of three existing dilapidated agricultural buildings, the conversion of an existing barn and Labourer’s Cottage to five new dwellings, and the erection of three proposed new-build dwellings with associated landscaping and access routes into the site.”

This is later confirmed in section 5.2 of the LVIA which states:

“The creation of three new dwellings in on the footprint of agricultural barns and a tank store.”

We conclude that the site of the three proposed new dwellings comprising part of this development does not meet the criteria for PDL and therefore the construction of these three properties should be regarded as inappropriate development in the Green Belt. This major failure to comply with NPPF 2019 requires the refusal of planning permission for the whole scheme.

The following paragraphs in the NPPF are also relevant to this proposal.

4.2. NPPF paragraph 134, which seeks to assist in prevention of encroachment into the countryside.

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

4.4. 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.

There are no special circumstances that would justify the harm caused to the Green Belt by this proposal. Given the very large quantity of development underway and proposed in and around Woodford there is no pressing need for additional dwellings, nor does this proposal provide a type of dwelling that is in short supply. 920+ dwellings of a variety of sized have planning permission on the aerodrome site. This is more than adequate for local needs. An additional 750 are proposed on the aerodrome site in the revised draft GMSF. Development proposals in the CEC Local Plan, including in Poynton and the large North Cheshire Garden Village of 1,500 dwellings on Woodford’s west border will all provide more than enough local housing, which in fact threatens to overwhelm local infrastructure and cause traffic congestion. There is already a large cumulative harmful impact on Green Belt in and around Woodford.

5. Compliance with Stockport UDP and Core Strategy

We believe that the proposal does not comply with the following SMBC policies:

5.1. Saved UDP Policy para GBA1.1, which includes Woodford in the extent of the Green Belt.

5.2. Saved UDP Policy paras GBA1.2, GBA1.5, GBA1.6 and GBA1.7, which list criteria for the control of development within Green Belt.

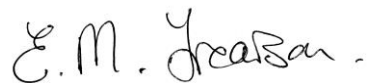
5.3. **Saved UDP Policies, Policy LCR1.1**, which does not permit development in the countryside unless it protects or enhances the quality and character of the rural area.

6. Summary

We believe that the planning application should be refused because:

- The site of three of the proposed dwellings does not meet the criteria for Previously Developed Land set out in Annex 2 Glossary of the current NPPF.
- The proposed development does not meet any of the tests for an exception to the presumption against inappropriate development in the Green Belt.

Yours sincerely,



Evelyn Frearson

On behalf of Woodford Neighbourhood Forum Management Committee

