



## Woodford Neighbourhood Forum

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

1 June 2020

Dear Ms Chase

**Reference:** DC/076685

**Proposal:** Erection of 3no 2 bedroom bungalow dwellings on the plot behind Flora Cottage (Flora Cottage will be retained), utilising existing site access from the highway. (Outline application with only access. layout and scale for determination at this stage; appearance and landscaping are reserved for future consideration).

**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.

### 1. General comments

#### Concerns

- The application fails to reference the Woodford Neighbourhood Pan.
- The application identifies other planning policies in the Stockport Development Plan, but does not assess the proposal against them.
- We believe that the proposal does not comply with policies in the NPPF and in the SMBC Saved UPD 2006.
- It is an outline planning application, which provides very little details about the appearance of the proposed dwellings, so design cannot be assessed.
- The Design and Access Statement shows two bedrooms on the ground floor but states that the plan is “*for information only*”.
- The proposed dwellings are described as bungalows, but industry definitions include dwellings described as chalet bungalows and dormer bungalows with two storeys.
- As it is an outline application, it will not be possible to impose a planning condition to limit the height to single storey.
- Volume calculations are inconsistent in whether or not they include Flora Cottage, so are not comparable (they are “apples” and “oranges”), and yet they have been used to assess the impact on the openness of the Green Belt.
- The revised proposal allows more space for vehicles to turn around and exit forwards, but we still have concerns over whether this will be possible for access to the property located furthest from the exit.
- The proposal is in a key site in the heart of the village so the process and outcome could set an example for future applications.

#### Points in support

- Due to the topography and size of dwellings proposed the new development will not be visible from Chester Road.
- The reduction from four dwellings to three is welcomed.

- The proposal would supply 2-bedroomed, market price houses, which would meet a need that was identified in our consultation survey for the neighbourhood plan.

## **2. Woodford Neighbourhood Plan (WNP)**

The application does not refer to 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. This is especially disappointing because SMBC officers were consulted during the preparation of this proposal.

We have assessed the proposal against policies in the 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 use 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 is an outline application so we are unable to assess design features. However, any proposed development on this site would need to comply with WNP DEV4.

### **2.3. WNP 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**

We welcome the proposed increase in garden space and vegetation. We would encourage mitigation for the removal of a pine tree and suggest that landscaping should focus on native species and pollinator species in order to achieve a net gain in biodiversity.

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

### **3. Flood risk**

Given the problems with drainage generally in Woodford, any new development proposal should consider flood risk and drainage.

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.

**4.1. NPPF paragraph 145**, which states that the local planning authority should regard the construction of new buildings as inappropriate in the Green Belt.

The proposal is for partial redevelopment of previously developed land.

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

We note that the volume calculations used to assess impairment of the openness of the Green Belt are inconsistent in whether or not they include Flora Cottage, so do not compare like with like (they are “apples” and “oranges”). Therefore, they do not provide a valid assessment.

**4.3. 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.

We believe that any proposed development in Woodford should be assessed on whether it fulfils any unmet need not met by the very extensive development on the aerodrome site. 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. We also have anecdotal evidence that more bungalows are needed for older people. However, with an outline planning application there is no guarantee that the final development would comprise single storey dwellings.

## **5. Saved policies of the SUDP 2006 and LDF Core Strategy/Development Management policies**

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

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

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

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

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

**5.3. 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.

The proposal fails to comply with this policy.

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

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. However, this is a previously developed site with existing buildings and the revised proposal would have little visual impact on the street scene.

**5.5. LCR1.1**, 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.

This is an outline application so the appearance cannot be assessed against this policy.

**5.6. 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.

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

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

Landscaping and mitigation for loss of the pine tree should aim to encourage biodiversity.

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

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. It would not be visible from the street and would not have an impact on the character of the village.

However, we believe the proposal does not comply with the following policies:

- NPPF 2019 Chapters 2: Achieving sustainable development and Chapter 13: Protecting Green Belt land.
- Impact on the openness of the Green Belt has not been accurately assessed.
- SUPD 2006 GBA1.2 and GBA1.5
- Stockport Core Strategy: CS1 Sustainable development including SD-1: Creating Sustainable Communities; CS2 Housing provision; CS3 Mix of housing; CS4 Distribution of housing Including H-1 Design of residential development and CS8 Safeguarding and improving the environment.
- It is not possible to assess against WNP DEV4.
- The proposal does not acknowledge or demonstrate compliance with WNP ENV4.

Yours sincerely,

*E. M. Frearson*

Evelyn Frearson

On behalf of Woodford Neighbourhood Forum Management Committee