



Woodford Neighbourhood Forum

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

11 July 2020

Dear Ms Chase

Reference: DC/076613

Location: Land off Church Lane, Woodford, Stockport

Proposal: Development of 2 New Residential Dwellings

1. General comments and concerns

- The site does not constitute a small gap between existing dwellings and cannot be classed as infill. See Appendix 2.
- It represents encroachment into the countryside in Green Belt.
- It will have a greater impact on the openness of the Green Belt than the existing sheds.
- It is located in a very sensitive location in Woodford on a country lane leading to countryside with low density housing. See Appendix 1-5.
- It will impair the open, rural character of the lane, which is widely used and appreciated by large numbers of walkers, cyclist, joggers and horse riders. See Appendix 3-5.
- The Arboricultural Statement provides recommendations for the management of vegetation at the boundary between the site and Church Lane, while the Ecology Report considers that this is “off-site”, the boundary of the site being the fence. The site plans draw the boundary such that the tall hedge and trees along Church Lane are not included. This needs clarifying. See Appendix 12.
- The vegetation at this boundary is a key feature. Viewed from the lane, the oak trees and tall hedge add significantly to the character of the lane, as well as providing environmental benefits for carbon capture, habitats and wildlife corridors for a large number of invertebrate, as well as birds and bats, and of course soaking up water. The mature oaks will be the most important contributors to this and we welcome the recommendation to retain them. Appendix 3, 12 and 13.
- While the recommendation to lay the hedge is acknowledged as sound advice for hedge maintenance, we note that some of the trees are very tall and we question whether they are suitable for successful laying at this stage in their growth. See Appendix 3, 12 and 13.
- The recommendation to remove part of the tall hedge in order to widen the entrance and to lay the remaining hedge, including tall trees within it, will have a large impact on the character of the lane and screening of the new development, because the result

will be a shorter and much lower hedge of around 3 to 4 feet in height. Appendix 3, 12 and 13.

- It is located on a narrow lane which has designated Quiet Lane status and is not suitable for further traffic. See Appendix 4.
- It is in an area liable to surface flooding. The road was frequently flooded during the autumn and winter of 2019/2000 and impassable for two weeks. See Appendix 6 - 8.
- In this notoriously wet, poorly drained location, the green vegetation absorbs water and helps to reduce surface flooding. Further building will reduce permeability of the ground and exacerbate existing flooding problems.
- It does not fulfil any unmet need in terms of type of housing. There is no shortage of large detached 4-bedroomed houses in Woodford. Planning permission for 920 dwellings + commercial premises + a care facility on the former aerodrome site includes proposals for large numbers of additional large houses of this type.
- A survey conducted by the Forum identified a demand for 2-bedroomed properties. The proposed development will not meet that need.
- The Planning Statement submitted with the proposal fails to recognise that the Woodford Neighbourhood Plan is the most recent and local part of the development plan for the Woodford area.
- Very limited weight should be attributed to the Appeal Decisions quoted in the Planning Statement because they pre-date the making of the Neighbourhood Plan.
- The proposal appears to contravene policies in the Woodford Neighbourhood Plan, NPPF, SMBC Saved UDP and Core Strategy policies.

2. Woodford Neighbourhood Plan

We note that the Planning Statement submitted with the application fails to recognise the substantial weight to be given to the Woodford Neighbourhood Plan in terms of the balance of relevant Planning factors in the determination of this application.

All of the appeal and court decisions referred to in the Planning Statement pre-date the making of the Woodford Neighbourhood Plan. This should be seen in the context of the out of date status of the Planning policies of the Stockport UDP and Core Strategy which both pre-date NPPF, the Localism Act and subsequent re-focusing of the Planning system from 2012. Therefore, very limited weight should be given to these decisions which pre-date the making of the Neighbourhood Plan.

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 term “Limited infilling” in Woodford is now defined in policy DEV1. The proposed development does not meet the policy criteria because:

- a. The application site does not complete an otherwise continuous and uninterrupted built frontage. The site is not bounded by existing development. On the northern side of this section of Church Lane the character is that of a few isolated and sporadic properties. Neither is the application site visually, nor functionally part of an existing development on this northern side of Church Lane. Housing is very sparse on the northern side of Church Lane containing the site, with just three widely spaced dwellings in half a mile from the junction with Hall Moss Lane to the junction with Blossoms Lane. See satellite images in Appendix 1 and 2.
- b. The site cannot be defined as a “relatively small gap between existing dwellings”. The gap between the two dwellings on either side of the site (Green Hedges and Long Acre) is greater than the footprint of two dwellings of similar size and scale to other dwellings in the immediate vicinity. Three dwellings with a similar footprint to Long Acre would fit into the site and a previous application for this site proposed four dwellings. See Appendix 2. The proposal has been “stretched” in order to fill the gap, resulting in over-sized dwellings, which are not in keeping with the scale and character of adjoining dwellings or others in the vicinity.

The Forum is disappointed that the inset to the location plan which accompanies the planning application (scale 1:1250 plan number 4124/001 Rev B) has been presented to seek to maximise the more developed areas at the junction of Church Lane and Hall Moss Lane rather than placing the site in the middle of the location plan which would have included the more rural areas reflective of the local area to the south.

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 outline application is located within a very sensitive area of the Green Belt due to its siting and character as described in section 1. The proposed dwellings are very large and do not respect the local rural character. Properties opposite on the south side of Church Lane comprise smaller dwellings with more modest sized gardens than the application proposals.

It is located in a very sensitive location in Woodford on a country lane, which is frequently used for outdoor recreation, leading to countryside with low density housing. This character should be retained. See Appendix 1-4.

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

One of the viewpoints requested for retention by residents was the view from Hall Moss Lane across the fields between Church Lane and Blossoms Lane. The proposed development marked in red in the image below would have an impact of this view and the view across the fields towards Church Lane from Blossoms Lane. See Appendix 10 and 11. The proposal does not respect local character and does not take into account the importance of views and vistas. Therefore, it does not comply with WNP ENV1.

Image extracted from the views and vistas map in WNP shown in Appendix 9.

Proposed site outlined in red.



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,
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	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

In the environment surveys conducted for the WNP we found more than four woody native species in hedgerow at the border with Church Lane (6H6 on our map), which concurs with the findings of the Habitat and Bat Surveys presented with the application, which led them to the following conclusion “This suggests the hedge to be a few hundred years old and it certainly meets the criteria for protected status.” We welcome and the recommendation to retain this hedgerow and mature oak tree at the border with Church Lane, and any recommendations to increase biodiversity on site in compliance with WNP ENV4.

However, we note that the Highways Report recommends “Widening of the access driveway to 5.5m” and “Improved lateral visibility via the management of adjacent verge / site boundary vegetation”. If widening of the driveway requires removal of part of the hedge, it would be in conflict with the recommendations in the Habitat Survey and WNP ENV3. Any management of the vegetation should be conservative, in order to retain its value as a habitat and contribution to the rural setting.

3. Flood risk

The proposal is in an area liable to surface flooding. The road was frequently flooded during the autumn and winter of 2019/2000 and impassable for two weeks. See Appendix 6-8.

In this notoriously wet, poorly drained location, the green vegetation absorbs water and helps to reduce surface flooding. Further building will reduce permeability of the ground and exacerbate existing flooding problems.

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”

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

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. We believe that the proposal does not comply with the following paragraphs in the NPPF:

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

The site is currently an agricultural field with a cluster of sheds in a rural location in Woodford. The proposal represents encroachment into the countryside.

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

The site makes an important contribution to the openness of the Green Belt. The proposal would have a much greater impact on the openness than the current sheds and stables.

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.

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 sizes 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.

4.4. NPPF paragraph 145, which provides exceptions to inappropriate development in Green Belt and includes limited infilling in villages

We do not believe the proposal can be classed as infill. The site represents a wide gap between two dwellings on a largely rural lane with widely spaced housing on that side of the road. As stated in 2.1., there are just three dwellings in half a mile from the junction with Hall Moss Lane to the junction with Blossoms Lane. See satellite images in Appendix 1. This cannot be described as "limited infill".

We believe that the proposal does not comply with paragraph 145g because it will have a greater impact on the openness of the Green Belt than the existing development; and it will cause substantial harm to the openness of the Green Belt.

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

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

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

2.3. **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.

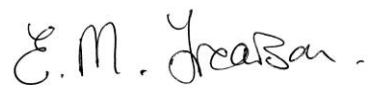
6. Summary

We believe that planning permission should be refused because the proposal does not comply with WNP DEV1 and it fails to comply with the NPPF because it does not meet the any of the criteria set out in paragraph 145 and is therefore inappropriate development in the Green Belt. The proposal also has greater impact on the openness of the Green Belt than existing structures and there are no exceptional circumstances which justify the harm to the Green Belt.

It would harm the character of a rural lane that is a treasured asset to residents in Woodford and the wider borough, which is frequently used for outdoor recreation with all the associated

physical and mental health benefits. In addition, it raises concerns with regard to additional traffic on a Quiet Lane and exacerbation of existing flooding problems in the immediate locality.

Yours sincerely,

A handwritten signature in black ink that reads "E. M. Frearson". The signature is written in a cursive style with a small flourish at the end.

Evelyn Frearson

On behalf of Woodford Neighbourhood Forum Management Committee

Appendix

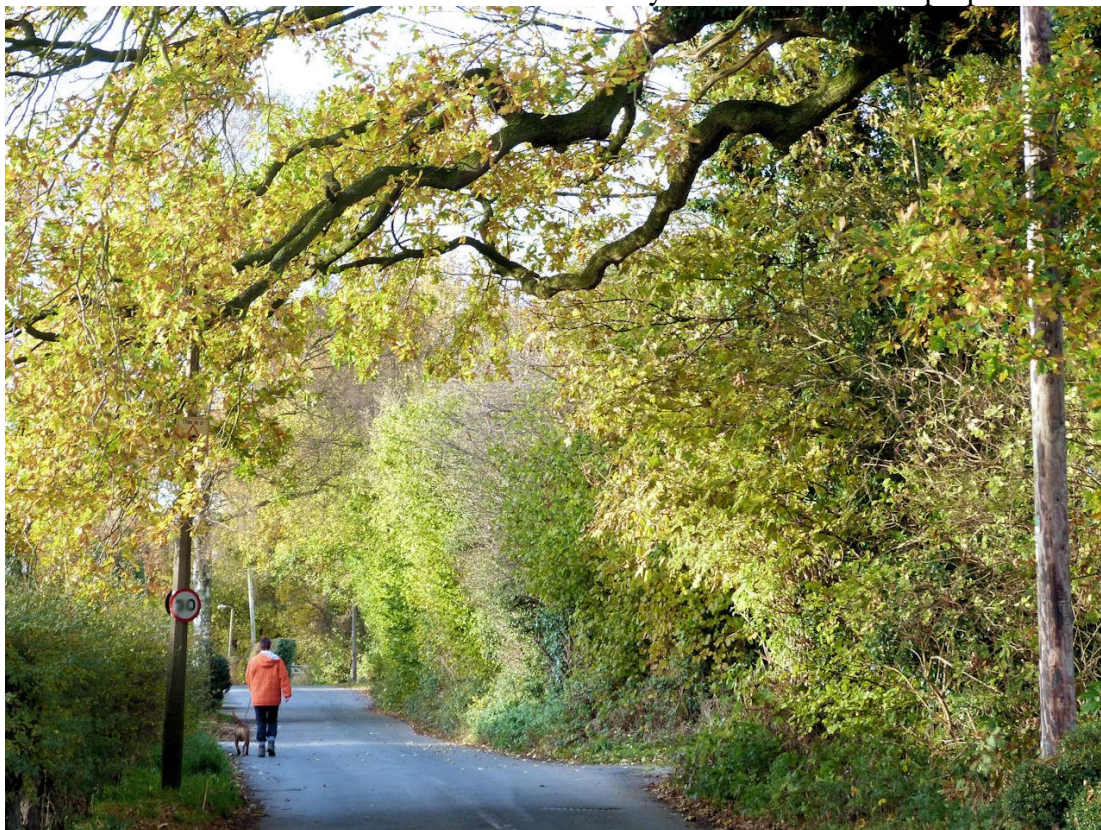
1. Satellite image of the location of the proposed site showing sparse housing on the north side of the road



2. Satellite image showing the wide gap between adjoining dwellings



3. Rural character of Church Lane at the boundary and entrance of the proposed site



4. Quiet Lane Status. Narrowness of the lane outside proposed site seen in the distance.



5. Vulnerable recreational road users in Church Lane near the proposed site



6. Regular and persistent flooding on Church Lane near the proposed site



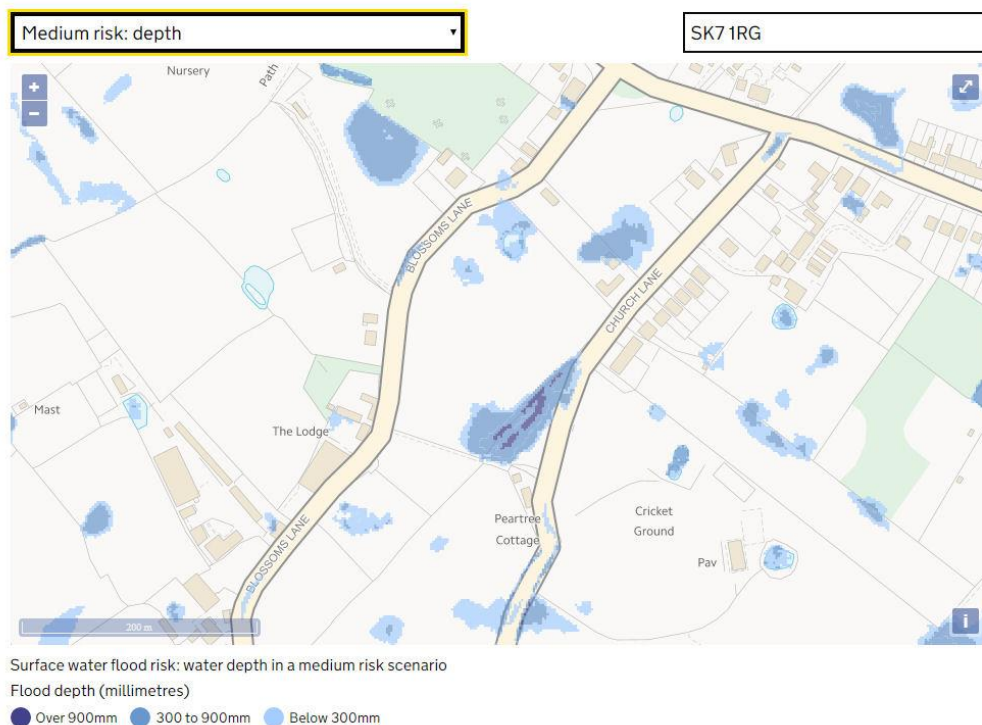
7. Road closed due to flooding near the proposed site



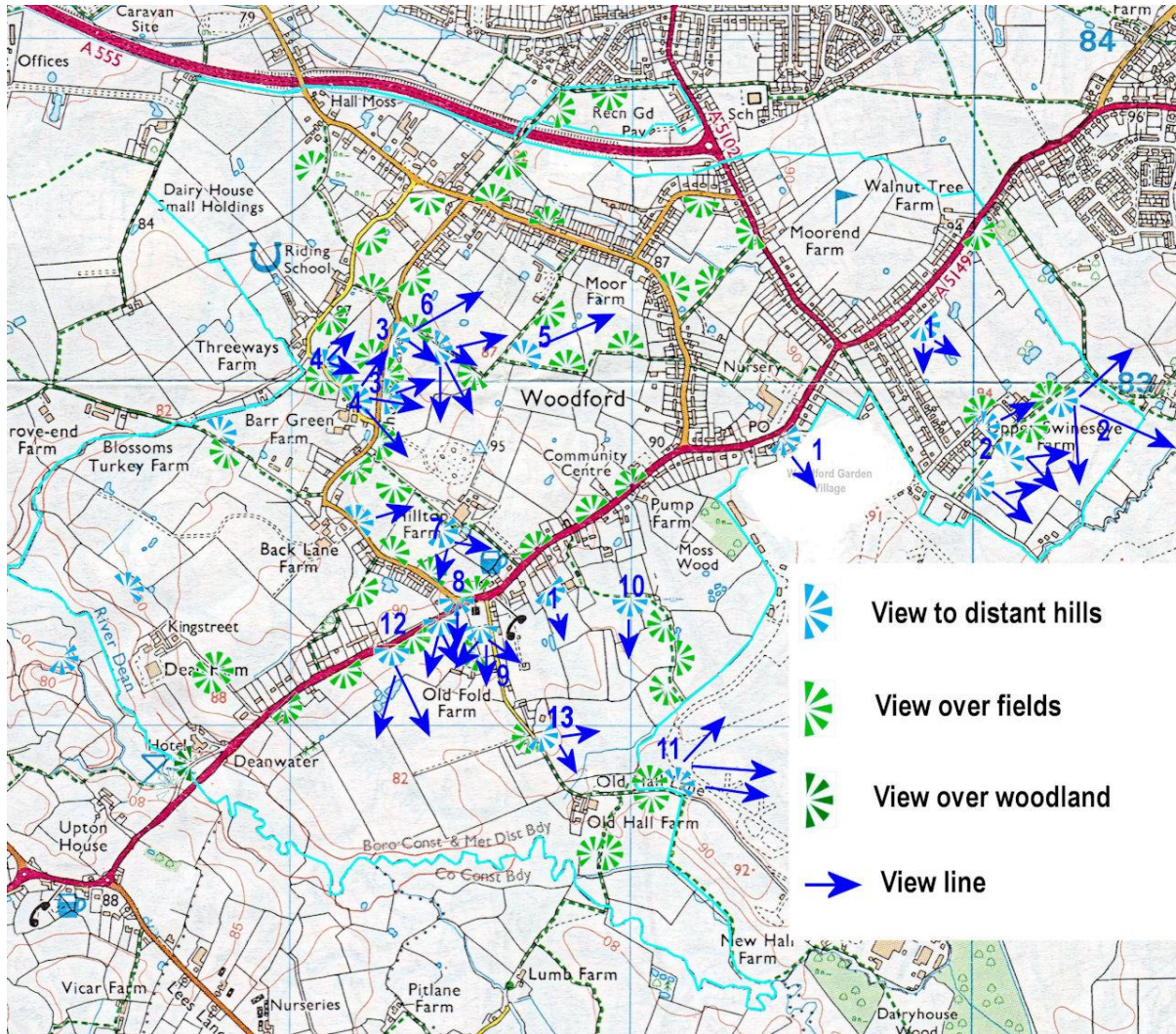
8. Surface Flood Risk Map. Downloaded on 19 May 20 from <https://flood-warning-information.service.gov.uk/long-term-flood-risk/map>

Learn more about flood risk

Select the type of flood risk information you're interested in. The map will then update.



9. Map showing Views and Vistas within and from the Woodford Neighbourhood Area



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

10. View from Hall Moss Lane with footprint of proposal outlined in red



11. View from Blossoms Lane with footprint of proposal outlined in red



12. View of Church Lane boundary from within the site



13. Church Lane outside the site (Google image)

