

Question to the Council – Pre-Planning Application

Please see conversation below

Dear Clerk (message received on Parish Council Website)

land off Breach Road be032

i sent in an email in july re. comments from smdc to be put to the Parish Council.

my question to the councilors. if a planning application was submitted would they be supportive, many issues would be solved with this development , for example the speed restriction that have been put in place have been ignored as motor bikes still race on this road saturday and sunday making it dangerous to cross both in and out of the village ,as suggested before the council could work with developers to install better traffic calming measures making it safer, also the 12 plus acres would provide local football and netball teams training grounds with out parents having to travel cutting parking and emission problems ,

also helping mental health through exercise ,

more affordable and social housing ,

creating jobs within the building industry,

income generated for parish council funds,

Comment or Message

i emailed you a few weeks ago asking the parish council if they would look at the email sent to me by Jane Curley after i asked for a pre app meeting

thank you for your e-mail and attachment. I can comment as follows:-

The Council is not aware of any need for the sport and recreational facilities being offered by your client.

There have been no affordable housing completions in Brown Edge since 2014.

However there is a Council resolution to grant planning permisison for housing at Stych Road, Brown Edge with a 33% affordable housing commitment. As previosuly advised the affordable housing provision for the District is being met in a planned and managed way through the new Local Plan

Jane Curley (Mrs)

Senior Planning Officer

will the parish council be objecting to proposed development at the Sytch?

Previous message:

my question to the pc is they objected to this site being developed in 2018 , now smdc are adamant it is going to be passed.

Thank you for your pre application enquiry in relation to the above. I have now had an opportunity to discuss with colleagues from Policy and set out below our advice. Please note due to current restrictions on travel I have not visited the sites but have relied on google earth/street view and my own knowledge of the area in providing this advice.

The emerging Local Plan is now at a very advanced stage of preparation and substantial weight can be given to policies within the plan as modified. I am not able to give you a timescale for adoption in part due to the Covid 19 issue. However I can advise that both of the sites on which you seek pre app advice lie outside the settlement boundary of Brown Edge and within the Green belt in the adopted Core Strategy and the new Local Plan.

Principle of development

Taking the housing proposal first and as advised above this site lies outside the settlement boundary of Brown Edge and within the Green Belt. As the proposal does not fall under any of the other exceptions set out in para. 145 of the NPPF, it amounts to inappropriate development in the Green Belt and is thus harmful by definition. However there would be other Green Belt harm. Development of this open, undeveloped, greenfield site with 85 houses would significantly compromise openness, the essential characteristic of the Green Belt and it would conflict with several of the main purposes of including land within the Green Belt. The NPPF says that substantial weight should be given to any harm to the Green Belt. Very special circumstances it says will only exist it says where the harm is clearly outweighed by other considerations such as to make the proposal acceptable. In my view the totality of Green Belt harm would be very substantial in this case and no other considerations are put forward that in my view would amount to very special circumstances to outweigh this very substantial harm (see further comments below). There would be strong conflict with Policy SS6C of the Core Strategy, Policy SS 10 of the emerging Local Plan and the NPPF.

Turning to the proposed community/recreational uses, this site also lies within the Green Belt. One of the exceptions to the restriction of development in the Green Belt listed at para 45 of the NPPF can be found at bullet point b) which says *... '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'.*

In my view and from the information provided the community development as a whole would also represent inappropriate development in the Green Belt and be harmful by definition. The sports hall, car park and skate park in particular would seriously compromise openness as would any flood lighting associated with the proposed uses. The development would also conflict with the purposes of including land within it. Furthermore it would extend development in a very illogical and damaging way into open countryside and the Green Belt relating poorly to the existing form of the village. It would be, in my view, represent a wholly unacceptable 'extension' of development. There would be strong conflict with Policies SS6C, DC1 and DC 3 of the Core Strategy, Policies SS10, DC1 and DC 3 of the emerging Local Plan and the NPPF.

You have indicated in your letter that your client would be prepared to 'gift' the land the land to the north of the proposed housing site for *'community use to meet locally identified shortfalls'*. I make the following observations in relation to this:-

1. Even if a need for these facilities were to be demonstrated it is not clear if you are saying that the 'gift' of land would be dependent upon the grant of planning permission for housing. I'm not sure why that would be in any event; your client could gift the land now if she so wished, independently of any grant of planning permission for housing. As you know permissions cannot be 'bought'. I am struggling to see any clear 'link' between the two. Gifting the land would not appear in itself to secure the facilities. No information is provided as to who would build, operate and maintain the facilities.
2. For the reasons outlined the community facilities would in themselves be inappropriate development in the Green Belt and unacceptable in principle

My conclusion is that at Officer level we are unlikely to support the principle of housing or community use on these Green belt sites.

Although a draft layout has been provided given my conclusions above I have not considered these in any detail. For the housing element I would need to see the Design and Access Statement to understand the basis upon which the layout has been arrived at and how it responds to and reflects its context. My initial impression is that it is rather engineered and regimented for this edge of village location with little apparent breathing space for any meaningful landscaping.

Neighbourhood Plan

You have referred to the Neighbourhood plan in your letter. The situation is that the Neighbourhood Plan is at an early stage of development. We understand that the Parish may wish to assess the suitability of sites in the Green Belt for development. However, para. 136 of the NPPF is clear that Neighbourhood Plans can only make detailed amendments to Green Belt boundaries where the need to do so has been established through strategic policies (i.e. in the Local Plan). The emerging Local Plan does not support this.

Queries raised in your letter

In terms of the other queries in your letter I can advise as follows:-

1. Latest housing supply figures

The latest published housing land supply position is 1.8 years (as of 31 March 2018). However, upon adoption of the Local Plan this year we will be able to demonstrate a five year housing land supply.

2. Number of housing completions in Brown Edge and the wider district over the last three years

17 homes have been completed in Brown Edge Parish during the emerging Local Plan period from 2014 to 31 March 2019. A further 14 homes have permission as of 31 March 2019.

The main modifications to the Local Plan show a revised Neighbourhood Area housing requirement for Brown Edge Parish of 20 homes over the period 2019 to 2033. This is in addition to the 14 homes with permission and 17 completions.

3. The Council's position on the proposals with regard to the Green Belt, need for housing and also the need for additional formal playing fields and community land in Brown Edge; *In terms of the need for h*

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ousing, the emerging Local Plan has been subject to extensive consultation and scrutiny. It has been informed by a comprehensive evidence base including a SHMA to consider the need for housing across the District and a Green Belt review. The Council does not consider that there is a need to release land from the Green Belt in Brown Edge in order to meeting the housing requirement for the District or the Rural Areas that the village sits within. The Local Plan Inspector would appear to concur with this position given that we have consulted on main modifications to the plan and held hearing session subsequently. The Inspector has not called for the plan to be modified to release further land from the Green Belt in Brown Edge or anywhere else in the District.

3. Whether the Council considers the proposal to meet the need for community facilities and formal playing fields as outweighing the impact on the Green Belt;
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