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Subject: Comment Received from Public Access

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Application Reference No. : SMD/2025/0537 Site Address: LAND BETWEEN RUDYARD ROAD AND HOT LANE
Rudyard Road Biddulph Moor Staffordshire Comments by: Karena Lawson

From:

36
Rudyard Road
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Submission: Objection

Comments: 1. Introduction

I object to the above Permission in Principle application. While the red line boundary of the application site is tightly drawn, there are recent and material engineering works on the same Green Belt field, immediately adjacent to and functionally linked to the application site, which must be taken into account when assessing this proposal.

In particular, a hardcore access road/track has been created within the field but outside the red line boundary of the application site. This road is highly relevant to the assessment of this application and raises serious concerns regarding Green Belt protection, pre-emptive development, and compliance with national and local planning policy.

2. Hardcore Road as Pre-Emptive and Enabling Development

Although the applicant may seek to distance the hardcore road from the application by excluding it from the red line boundary, planning decisions must consider the substance and effect of development, not artificial boundaries.

The hardcore road:

Is located within the same Green Belt field as the application site

Is aligned in a manner that facilitates access to the land proposed for housing

Represents engineered works, not a temporary or informal agricultural track

Has the clear effect of making the site more readily developable

Such works constitute pre-emptive or enabling development, undertaken in advance of planning consent, and should be treated as part of the wider development proposal when assessing harm.

This approach is consistent with established planning principles that seek to prevent 'salami-slicing' and the deliberate separation of enabling infrastructure from the main development in order to avoid proper scrutiny.

3. Harm to Green Belt Openness

The site lies within designated Green Belt, where the fundamental aim is to preserve openness and prevent urban sprawl.

The construction of a hardcore road:

Represents engineering works, which are a form of development

Introduces urbanising features into open countryside

Causes permanent physical and visual harm to openness

When considered alongside the proposed residential development, the road contributes to the incremental erosion of the Green Belt, contrary to the purposes set out in the National Planning Policy Framework (NPPF).

The cumulative impact of the road and the proposed dwellings must be assessed together. Even if the road lies just outside the red line, its presence undermines any argument that the proposal would preserve Green Belt openness.

4. Inappropriate Development and Policy Conflict

Residential development in the Green Belt is, by definition, inappropriate development unless very special circumstances are demonstrated. No such circumstances have been established.

Furthermore:

The hardcore road itself is inappropriate development on Green Belt land

There is no evidence that it is reasonably necessary for agriculture

Its scale and construction suggest non-agricultural intent

The PIP application therefore conflicts with:

National Green Belt policy within the NPPF

The objectives of Staffordshire Moorlands District Council Local Plan policies which seek to protect the openness, character, and function of the Green Belt

5. Relevance to Permission in Principle

While a PIP application considers only the principle of development, access and suitability of the location remain key considerations.

The presence of an unauthorised or unjustified hardcore access road:

Raises concerns about the acceptability of the site

Demonstrates that the proposal relies on enabling infrastructure that has not been properly assessed

Undermines confidence that the development can be delivered without further Green Belt harm

Granting PIP in these circumstances would risk legitimising pre-emptive works and setting an undesirable precedent for incremental Green Belt erosion.

6. Conclusion

The hardcore road within the same field, albeit outside the red line boundary, is material to the assessment of this application. It represents pre-emptive, enabling development on Green Belt land and contributes to cumulative harm to openness and character.

For these reasons, the proposed development:

Fails to comply with Green Belt policy

Relies on inappropriate and potentially unauthorised engineering works

Should not be supported in principle

The application should therefore be refused.

Yours Faithfully

Karena Lawson

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