

From: William P. Woodward <[REDACTED]>
Sent: 28 March 2026 16:49
To: Planning Comments (SMDC)
Subject: Objection to SMD/2026/0099

Categories: [REDACTED]

Please find attached email objecting to the above. This has been already emailed to Ben Hurst, and I would appreciate if you would register it and confirm to me that this has been done. I have had a reply from Mr Hurst and will also forward that and my reply to him to you for registration and confirmation.

Kind regards

WPWoodward

FORMAL PLANNING OBJECTION

Application Ref: SMD/2026/0099

Site: Land South of Farmside Lane, Biddulph Moor, Staffordshire

Proposal: Permission in Principle for up to 7 dwellings

Dear Mr B Hurst,

We write to **formally object** to the above Permission in Principle application.

This representation is submitted having regard to the Development Plan, the National Planning Policy Framework (NPPF), and the statutory duty under Section 38(6) of the Planning and Compulsory Purchase Act 2004.

1. PRINCIPLE OF DEVELOPMENT – GREEN BELT

The application site lies within the Green Belt. The proposal does not fall within any category of appropriate development as set out within the NPPF and is therefore, by definition, inappropriate development.

Inappropriate development is harmful to the Green Belt and must be afforded **substantial weight** in the planning balance.

Planning permission should not be granted except in the presence of **Very Special Circumstances (VSC)**.

2. FAILURE TO DEMONSTRATE VERY SPECIAL CIRCUMSTANCES

No Very Special Circumstances have been demonstrated.

The supporting material relies on:

- An alleged shortfall in housing land supply;
- Generalised sustainability arguments; and
- A “rounding off” narrative

These are generic planning considerations and do not amount to VSC, either individually or cumulatively.

The proposal relates to a modest scheme of 7 dwellings, which attracts only limited weight in the planning balance. This level of benefit cannot clearly outweigh the definitional harm to the Green Belt and associated harm to openness.

In the absence of Very Special Circumstances, national policy is clear that planning permission **must not be granted**. This is not a matter of planning judgment but a clear policy requirement.

3. MISAPPLICATION OF THE TILTED BALANCE

The applicant places reliance on Paragraph 11(d) of the NPPF.

However, it is well established that:

- The tilted balance does **not override Green Belt policy**;
- Paragraphs 152–153 of the NPPF remain fully engaged; and
- The requirement to demonstrate VSC is **not displaced**

Accordingly, the absence of a five-year housing land supply does not provide a lawful basis to approve inappropriate development in the Green Belt.

4. HARM TO OPENNESS AND COUNTRYSIDE ENCROACHMENT

The site currently forms part of an open field at the edge of the settlement and makes a clear contribution to the openness of the Green Belt.

The proposal would:

- Introduce built form into undeveloped land;
- Extend development beyond the established settlement boundary; and
- Result in clear encroachment into the countryside

This would cause harm to both the **spatial and visual openness** of the Green Belt.

The suggestion that the development represents “rounding off” is not supported by the site’s physical context. The site is not enclosed by development and lacks any strong or defensible boundary. As such, it does not read as a natural continuation of the settlement but as an extension into open countryside.

5. CONFLICT WITH THE PURPOSES OF THE GREEN BELT

The proposal conflicts with the fundamental purposes of the Green Belt, in particular:

Safeguarding the countryside from encroachment

The development represents a clear outward extension of built form into currently undeveloped land.

6. DEVELOPMENT PLAN CONFLICT

The proposal is in direct conflict with the adopted Development Plan, including:

- **Policy SS2 – Settlement Hierarchy**
- **Policy SS9 – Smaller Villages Strategy**
- **Policy SS10 – Other Rural Areas Strategy**
- **Policy H1 – New Housing Development**
- **Policy DC3 – Landscape and Settlement Setting**

These policies seek to strictly control development in the countryside and protect settlement boundaries.

The proposal represents a clear and unjustified departure from the spatial strategy.

7. LIMITED WEIGHT OF HOUSING BENEFITS

Even if a housing land supply shortfall exists:

- The delivery of 7 dwellings is limited in scale;
- The contribution is not strategically significant; and
- The weight afforded is therefore limited

Such limited benefit cannot outweigh the substantial harm identified.

8. SUSTAINABILITY

The site occupies an edge-of-settlement location with limited access to services and facilities.

Future occupiers would be reliant on private vehicles for day-to-day needs. As such, the sustainability credentials of the site are overstated and attract limited weight.

9. LACK OF SUPPORTING EVIDENCE

The application seeks to establish the principle of development whilst deferring key matters including:

- Highways safety and access arrangements;
- Ecology and biodiversity net gain;
- Drainage and infrastructure; and
- Site-specific constraints

No robust evidence has been provided to demonstrate that these matters can be satisfactorily addressed.

Granting Permission in Principle in the absence of such information would be premature.

10. SUITABILITY AT PERMISSION IN PRINCIPLE STAGE

Permission in Principle requires the Authority to be satisfied that the site is suitable for residential development in principle.

In the absence of robust and proportionate evidence in respect of highways, access, drainage, and environmental constraints, it has not been demonstrated that the site is suitable.

As such, the application is premature and fails to meet the requirements of the Permission in Principle regime.

11. PLANNING BALANCE

The proposal gives rise to:

- Definitional harm to the Green Belt;
- Harm to openness;
- Conflict with the purposes of the Green Belt; and
- Clear conflict with the Development Plan

Set against this are limited and non-strategic benefits arising from the delivery of 7 dwellings.

The proposal would also undermine confidence in the plan-led system by allowing development in a location where it is explicitly restricted.

The harm clearly and demonstrably outweighs any benefits.

12. CONCLUSION

The proposal constitutes inappropriate development in the Green Belt for which no Very Special Circumstances have been demonstrated.

It is contrary to both national and local planning policy and fails to meet the statutory test for approval.

In these circumstances, refusal represents the only decision that is fully aligned with national policy and the Development Plan, and is the only outcome capable of being robustly defended.

13. FORMAL REQUEST

For the reasons set out above, the Local Planning Authority is respectfully requested to:

REFUSE PERMISSION IN PRINCIPLE

Yours faithfully,

WPWoodward

Good Moring Mr Woodward

Thankyou for your comments, they are noted and will be considered.

You have emailed them directly to me, have you also submitted them through the portal so that they can be formally logged and uploaded?

Your comments have been set out in the manner of a professional assessment relative to Green Belt policy.

However, your comments do not consider the possibility that the land is 'grey belt' and the development would be provided for by the exception at paragraph 155 of the NPPF – that will be the key point here.

I wonder whether you have given any consideration to that matter.

Kind Regards

Ben

RE: Application Ref SMD/2026/0099 – NPPF Paragraph 155

Dear Ben,

Thank you for your email.

I can confirm that the representations will also be submitted via the portal to ensure they are formally logged.

I have given careful consideration to your point regarding the potential application of paragraph 155 of the National Planning Policy Framework (NPPF), and in particular how this relates to the supporting planning statement submitted with the application.

Paragraph 155 – Correct Application:

As you will be aware, paragraph 155 introduces a cumulative test. Development can only be regarded as not inappropriate where all criteria are satisfied.

In this instance, it is not considered that those criteria are met.

Criterion (a) – Green Belt Purposes:

The supporting statement suggests that the proposal represents an opportunity to “round off” the settlement and that the site does not strongly contribute to Green Belt purposes.

However, the site forms part of an open field beyond the defined settlement boundary and is not contained or enclosed by development. It instead forms part of a wider expanse of open land extending into the countryside.

Development in this location would extend built form outward rather than consolidate an existing edge. As such, it represents encroachment into the countryside, directly conflicting with a fundamental purpose of the Green Belt.

On this basis, it is difficult to conclude that criterion (a) is satisfied.

Criterion (b) – Unmet Need:

It is acknowledged that the Council's current housing land supply position may indicate a level of unmet need.

However, **paragraph 155 requires that all criteria are satisfied**. The presence of unmet need does not in itself justify development in the Green Belt where the remaining criteria are not met.

Criterion (c) – Sustainability:

Whilst the supporting statement references proximity to local facilities, this does not in itself demonstrate that the site represents a genuinely sustainable location.

The site occupies an edge-of-settlement position within a rural context, with a limited range of services and constrained opportunities for sustainable transport. In practice, future occupiers would be reliant on private vehicles for the majority of day-to-day journeys.

In this context, the proposal does not align with the objectives of paragraphs 110 and 115 of the NPPF, and criterion (c) does not appear to be met.

Criterion (d) – Golden Rules:

There is no evidence before the Authority to demonstrate compliance with the "Golden Rules" set out in paragraphs 156–157 of the NPPF, including enhanced affordable housing provision, infrastructure improvements, or the delivery of accessible green space.

In the absence of such commitments, criterion (d) cannot be said to be satisfied.

Suitability at Permission in Principle Stage:

Whilst it is acknowledged that this application is made in Permission in Principle form, the Authority must still be satisfied that the site is suitable for residential development in principle.

At present, there is no substantive evidence before the Authority in respect of highways, drainage, ecology or other constraints.

The suggestion that such matters can be addressed at a later stage does not remove the need to establish suitability at this stage.

In the absence of sufficient information, it cannot reasonably be concluded that the site is appropriate for development.

Housing Land Supply and Tilted Balance:

The position regarding housing land supply is noted.

However, the absence of a five-year supply does not override Green Belt policy, nor does it remove the requirement to satisfy paragraph 155 or demonstrate Very Special Circumstances where development remains inappropriate.

Consequence:

As multiple limbs of paragraph 155 are not satisfied, the proposal cannot be treated as non-inappropriate development.

It must therefore be assessed as inappropriate development within the Green Belt, requiring Very Special Circumstances.

No such circumstances have been demonstrated.

Decision-Making Context:

In circumstances where key policy tests are not clearly satisfied, it is important that the decision reached is robust and capable of being supported by the evidence and policy framework.

In this case, there is a clear and defensible basis for refusal, whereas the justification for approval would rely on policy conclusions that are not fully supported.

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Kind regards,

WPWoodward

Sent from my iPad