

[REDACTED]

From: [REDACTED]
Sent: 07 June 2026 21:08
To: Planning Comments (SMDC)
Subject: Comment Received from Public Access

[REDACTED]

Application Reference No. : SMD/2026/0201 Site Address: Land Off Breach Road Brown Edge Staffordshire
Comments by: Andrews
From:

Breach Road
Brown Edge
Stoke on Trent

[REDACTED]

[REDACTED]

Submission: Neither

Comments: I submit the following objections to the proposed major development. This scheme contradicts Staffordshire Moorlands Local plan (SMLP) and also the National Planning Policy Framework (NPPF). I justify my objection with references from the SMLP, NPPF, staffmoorlands.gov.uk and gov.uk at the end of this document:

GREEN BELT AND LOSS OF OPENNESS

The site is in the West Midlands Green Belt and the proposal is inappropriate development. It would harm openness in both visual and spatial terms and would conflict with Green Belt purposes that include checking unrestricted sprawl, preventing the merging of settlements, and safeguarding the countryside from encroachment.

1. No very special circumstances have been shown that could clearly outweigh this harm
2. The development would extend the curtilage of the village. It would definitively encroach the countryside further than existing dwellings both to the north of Spring Crescent and those on Breach Road to the east, thus setting a precedent for further development to adjacent land within the new housing boundaries.

SPECIAL LANDSCAPE AREA

*1. (Source staffmoorlands.gov.uk - link in references) - Green Belt / Special Landscape Area / Green Belt - The land surrounding Brown Edge is designated Green Belt. The area surrounding Brown Edge to the northern side of High Lane and Breach Road is a designated Special Landscape Area.

2. Building on a Special Landscape Area (SLA) requires navigating strict planning policies aimed at protecting the visual and environmental quality of the countryside. To be approved, developments must generally be small-scale, visually sympathetic to the surrounding environment, and directly integrate with the local landscape without destroying its key characteristics. Any proposal must demonstrate that it conserves or enhances the landscape's value rather than detracts from it.

GREY BELT CLAIM

The label of Grey Belt does not remove Green Belt status or relax decision tests. Development must still satisfy the strict national tests for proposals in the Green Belt. Those tests include not undermining Green Belt purposes and being in a genuinely sustainable location. The applicant discloses 'Pre-application advice has been received from Staffordshire Moorlands District Council which sets out that: 'The development would utilise Grey Belt and would not fundamentally undermine the purposes (taken together of the remaining Green Belt across the area of the plan. As stated above, the site is not previously developed land. However, it is also not an 'area' or 'asset' which provides a strong reason for refusing development other than it being in the Green Belt. I therefore consider the site could be regarded as a 'Grey Belt' site.'

THIS 'REGARD' SUGGESTS THE LAND REPRESENTS A SUSTAINABLE LOCATION, APPROPRIATE TO MEET UNMET HOUSING NEEDS AND DIRECTLY CONTRADICTS THAT SMDC DESIGNATION OF THE SPECIAL LANDSCAPE AREA.

Grey Belt was formalised in the revised NPPF and accompanying Planning Practice Guidance to help local authorities meet housing targets. Even if a site does qualify as Grey Belt, securing planning permission depends on meeting specific planning requirements and demonstrating wider benefits that align with national and local policies.

1. "Grey Belt" land is defined as areas within the Green Belt that are either previously developed (brownfield) or make a very weak contribution to the Green Belt's core purposes. The land in the above application acts as a critical buffer against uncontrolled expansion. It is not already surrounded by development, enclosed by infrastructure, or lacking openness.
2. Residential Grey Belt development must also address a housing shortfall and align with the local plan: the SMLP sets out the council's vision and strategy for the district until 2033: 'Brown Edge is the only village within the Parish. It is surrounded by Green Belt and the area outside the settlement within the Parish is limited. The SHLAA identifies a number of small sites not within the Green Belt which have development potential.' SMLP set a target of 20 new homes to be built by 2033. This number was reached, exceeded, and additional homes added since.
3. All Grey Belt development should be in a sustainable location, with good transport, infrastructure, and amenities, ensuring minimal strain on local services and alignment with sustainable growth policies.
4. The proposed development land is not Grey Belt, but Green Belt. The council, 'Need to enhance and protect Green infrastructure'. There are also important areas of open space and Local Green Space within settlements which need to be retained' (SMLP)
5. The assumed grading of the land of the scheme to level 4 (poor) is a result of poor husbandry during the past 20 years. This is the result of overgrazing, lack of fertilisation and not allowing the fields to lie fallow, and also a neglect of the trees including those which are subject to Preservation Orders. Prior to 2005, the land was sufficiently maintained over several generations to support herds of cattle and harvest hay. Contrary to the description of the condition of the land in this application, it is still suitable for grazing and pasture, and with good farming practice, would regain the capability of providing a range of crops at reasonable levels.

RECLASSIFICATION OF THE LAND AS 'GREY BELT' SUGGESTS THAT NEGLECTED GREEN BELT LAND COULD BE CLASSIFIED AS GREY BELT, AND WILL SET A PRECEDENT FOR GREEN BELT DEVELOPMENTS RESULTING IN EXTREME DETRIMENTAL CHANGES TO THE RURAL LANDSCAPE

LANDSCAPE, VISUAL APPEARANCE, DESIGN AND AESTHETICS

1. The proposed scheme, by reason of its size, scale and visual intrusion, fails to protect and enhance the District's character and distinctiveness and will result in harm to the landscape character of the countryside contrary to SMLP (Policy DC3) and NPP.
2. 'Planning policies and decisions should ensure that developments add to the overall quality of the area of good architecture, layout and appropriate and effective landscaping; Development that is not well designed should be refused'; and 'Achieving well-designed places, which addresses the creation of high quality, beautiful and sustainable buildings and places (NPPF section 12). Developments should add to the overall quality of an area, should be visually attractive with regards to architecture, layout and landscaping, should be sympathetic to local and historic character, respond to the surrounding built environment and landscape setting and establish or maintain a sense of place'.
3. From the last census, over 40% of the Brown Edge population is aged 60 and older. The NPPF specifically requires local planning authorities to explicitly assess and plan for the diverse housing needs of older people: 'Councils must identify local demand for retirement housing, and adaptable general housing to help seniors live independently for longer.' Excepting 3 possible ground floor 1 bedroomed (I would assume) apartments I see no provision for this in the block plan and consider that the provision of bungalows or other homes suitable for elderly residents which are at a premium in the village and more in demand than 2 storey houses.
4. The architecture is drab and resembles any other new-build development.

NEIGHBOURHOOD INFRASTRUCTURE

The negative effect on local services would outweigh any gain.

'Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes'(NPPF paragraph 110).

The site is neither within realistic walking distance of key services nor served by a frequent public transport option. The proposal would lock in car dependency and does not comply with local accessibility benchmarks.

1. Hanley is the only town to which there is a bus service, hourly, Monday to Saturday. The earliest the first bus from the village arrives in town is close to 8am, the last leaving town to come home before 6pm. Neither does the bus go directly to any local train stations. Travel by bus for out of town or shift work would prove impossible.
2. Because of the elevation of the village and the geographical terrain, unless travelling very close to Hanley or intermediate stops, a car journey is essential.
3. Local doctors and dentists are already at capacity, there is no pharmacy, nor other health services locally.
4. Endon High School, the only one within walking distance or on a direct bus route, is already oversubscribed. There are limited places available at the primary school however this is not in walking distance from the scheme for young children, nor are there footpaths for much of the route.
5. The Post Office is only open 2 days a week. There is one shop, (Morrison's Daily) the future of which is uncertain according to recent national news.
6. There is limited employment within walking or cycling distance of the village, particularly taking into account the steep hills in all directions.
7. There is little entertainment in the village. There are 2 public houses. Some keep fit/yoga/dance classes are periodically available at the Village Hall or Community Centre.
8. There is no evening or Sunday bus service to access other amenities.

HIGHWAY SAFETY, TRAFFIC GENERATION AND PARKING

1. Access to and from the main road is in close proximity to a sharp bend, and incline, with a significant camber, particularly approaching Brown Edge from Endon near to the proposed access route. There have been numerous accidents on that stretch of road including fatalities. It is a favoured spot for the Community Speed Watch despite the limit of 30mph, as many exceed that limit.
2. The proposed access route is opposite both a day nursery and residential care home, thus frequently used by the very old and very young. The access to the scheme would be crossed daily by children walking to and from the high school in Endon. As there is no footpath on the opposite side of the road, a crossing facility would be essential on the access road to which is namely a housing estate. Safe access is paramount in any decision to be made.
3. Because of the poor bus service, described above, Brown Edge does not allow easy access to jobs, shops and transport services, demanding high levels of car ownership. The proposed development appears to target younger generations the majority of whom will commute and may have adult children or extended family living at home. Whilst approximately 60 cars are seen in the block plan submitted with the application, this number is far from the potential ownership of the development's residents. 55 households consisting of 149 bedrooms will effect upwards of 100 cars.
4. There is inadequate parking provision, without including visitor and delivery and service vehicles. Please refer to the Staffordshire Moorlands Local Plan for parking: Section 9, Appendix 2 Parking Guidance, c3 Residential dwellings.

DRAINAGE AND WATER SUPPLY PROBLEMS AND FLOOD RISK

1. There is a long history of flooding to the Cornish houses on Breach Road, gardens on a regular basis, and inside dwellings. Drains are overcome, unable to cope. Houses and impermeable surfaces on the development would cause existing dwellings to become uninhabitable without heavy engineering to manage surface water.
2. Foul sewers on Breach Road and Greenfield Avenue are already inadequate. Sewage floods gardens and driveways. Severn Trent habitually attend. Unless major additional and remedial work to the sewage system occurs there will be serious concerns both to health of existing residents and their qualities of life.
3. The clean water supply is unreliable, often interrupted for long periods. Villagers experience noxious discoloured water or no supply at all, particularly around the area of the proposed scheme. Severn Trent have frequently delivered bottled water, (especially unacceptable for families), and offered financial compensation. Further demand would intensify this without improvements to the current mains supply and distribution process.
4. A freshwater stream runs underground from the northern edge of Spring View and under properties in Spring View through a precast pipe. From there, it reappears briefly to the of the 'ecological buffer zone', disappearing south via another precast pipe (it would be difficult to impossible to access the interior of these pipes, even lying horizontally in the water). From there, the stream flows east-southeast through a stone-built culvert which predates 1900. This goes under the rooms and footings of the houses fronting the main Breach Road to the south of the land,. These dwellings were built c.1900 and the footings are built from dry-stone. Any increase in run off and surface water from the proposed development would overwhelm these properties particularly, undermining the foundations. The stream then flows below Breach Road near to the proposed entrance to the development. Any impedance or surge in this flow will flood gardens and adjoining roads.

5. Finally, the land directly behind the houses on Breach Road is regularly waterlogged. This would need to be addressed.

AFFORDABLE HOUSING

Properties in Brown Edge will always be desirable because of the peace, quiet and strong sense of community in the village, keeping them in demand regardless of availability. It is arguable whether any of the proposed homes would support first-home finance. The proposed development is predominantly 3 and 4 bedroomed homes, with the inclusion of 1 and 2 bedroomed units merely to satisfy NPPF ruling; 1 bedroomed units (which would be leasehold at best, being in a block) or possibly the 2 bedroomed properties, subject to status. However, the village does already offer affordable homes for sale including 1 bedroomed terraced houses, and 2 bedroomed terraced and semi-detached. There are also several flats and houses frequently available for rental.

GREEN SPACE, ECOLOGY, AND TREES

1. The plan provides little amenity space for potentially around 200 people. A significant proportion of this is taken up by a pond, possibly an attempt to alleviate drainage problems. This pond is accessible to the public, and passed by many unaccompanied teenage children going to and from school, which raises serious safety concerns. It also raises an issue of serious harm to young children from the development gaining access.

2. The scheme would cause habitat loss and fragmentation. Wildlife and fauna frequent the fields to the north of Breach Road, including bats, hedgehogs, foxes, mice and other animals native to open fields, many species of birds including owls. Buzzards have an established nesting ground in close proximity and breed successfully. Roe deer inhabit hedgerows, fields and woodlands (Tinster's Wood is directly opposite). and have been observed on Breach Road on several recent occasions.

3. Pollution of the stream should also be addressed, particularly mitigating surface water run-off.

4. Trees are protected. Having read the applicant's document accompanying the application * Arboriculture Key Facts Note it is concerning that many of these protected trees are allegedly dead, dying and/or in poor condition with soil erosion, injury, wounds, exposure of anchor roots in addition animal trampling, and bark browsing. The few trees which the applicant considers worth saving (in good condition or better), are trees on the periphery of the development, or are in a position to be incorporated into the landscape. Again, the majority of damage to these trees could be directly attributable to poor husbandry and bad management with the specific purpose of downgrading the land in order to build for profit.

NOISE, SMELLS, AND DISTURBANCE

Even quiet residents from 55 dwellings will produce a significant amount of noise This has the potential to adversely impact on the amenity of nearby residents. Noise from by so many adjacent properties in close proximity would generate construction noise, DIY, music, by traffic, car doors etc. This would not only disturb neighbours, but also previously established wildlife and fauna, accustomed to quiet, tranquil fields.

LOSS OF PRIVACY

New homes will directly overlook the properties on Breach Road, with several overlooking houses on Spring View on account of the topography of the proposed scheme. The new homes will lack privacy in like manner. The rear gardens of Spring View will also be overlooked.

IN CONCLUSION

The proposal conflicts with national policy on Green Belt, sustainable transport, design, the natural environment and flood risk, the National Planning Policy Framework and the Staffordshire Moorlands Local Plan when read as a whole. I respectfully ask the Council to refuse the application.

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REFERENCES

** Link from section 2 (SPECIAL LANDSCAPE AREA ¿ SMDC website)

https://deref-mail.com/mail/client/98ETmP5GJj0/dereferer/?redirectsUrl=https%3A%2F%2Fwww.staffsmoorlands.gov.uk%2Fmedia%2F651%2FBlythe-Bridge--Forsbrook-and-Brown-Edge%2Fpdf%2F03Blythe_Bridge___Forsbrook_and_Brown_Edge.pdf%3Fm%3D1479139973527&lm

NATIONAL PLANNING POLICY FRAMEWORK

143. The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.
- 145- 146 Authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified, in which case proposals for changes should be made only through the plan-making process. Strategic policies should establish the need for any changes to Green Belt boundaries¿¿¿. Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identify need for development
- 152 Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances
153. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. ¿Very special circumstances¿ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.
154. A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are: a) buildings for agriculture and forestry; b) the provision of appropriate facilities c) the extension or alteration of a building d) the replacement of a building, e) limited infilling in villages; f) limited affordable housing for local community needs under policies set out in the development plan; and g) limited infilling or the partial or complete redevelopment of previously developed land

STAFFORDSHIRE MOORLANDS LOCAL PLAN

7.3 Housing (Policy H1)

3a) All development shall be of high quality, sustainable housing. In addition: a) Housing for special groups, particularly for older people and others as identified in the SHMA

3c) All housing development should be at the most appropriate density compatible with the site and its location, and with the character of the surrounding area.

4 c) In all cases the development will not lead to a prominent intrusion into the countryside or have a significant adverse impact on the character and appearance of the countryside.

5 a-f) In the other rural areas in the open countryside, only the following forms of housing development will be permitted: (none of the reasons a-f are applicable)

6 When development is located in the Green Belt, national Green Belt Policy will apply.

7.5 Design and conservation

7.7 Natural Environment

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