

[REDACTED]

From: [REDACTED]
Sent: 02 July 2026 16:15
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: M Morris
From:

Brown Edge
Brown Edge
Stoke on Trent

ST6 8RD

[REDACTED]
[REDACTED]
Submission: Objection
Comments: SMD/2026/0201 ħ Land off Breach Road, Brown Edge

Outline planning application for the erection of up to 55 dwellings.

I object to the above planning application. The proposed development represents inappropriate, unsustainable development within the Green Belt, and the applicant's attempt to label the site as "grey belt" is unjustified

ħ GREY BELT

When it was reviewed in the Council's 2015 Green Belt Study, the proposed site for this development was considered to have a contribution towards checking unrestricted sprawl. The land of the proposed development is not Grey Belt. There is no formal statutory "grey belt" planning category in national policy. Grey belt was coined by Parliament to refer to poor quality and ugly areas. The primary reasons to reclassify Green Belt to Grey are to focus on previously developed or low-quality areas within the protected Green Belt, whilst still preventing urban sprawl, protecting ecological potential, avoiding car-dependent communities, and preventing speculative land neglect. To reclassify this arable Green Belt as ħGrey Beltħ indicates that any green belt land allowed to fall into neglect will set a precedent for green belt developments and will result in extensive detrimental changes to the entire rural landscape.

The council admits that the site is not previously developed land, and that construction of 55 houses on the open greenfield site, visible from roads and public footpaths will have a significant visual impact and a degree of landscape harm. However, it also claims it is not in an ħareaħ or ħassetħ which must be challenged:

ħGreen Belt / Special Landscape Area / Green Belt: ħThe 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. (Source staffs-moorlands.gov.uk). The Council also admits that the site is in the Ancient Slope and Valley Farmlands landscape character type within the North Staffordshire Green Belt.

A deemed undersupply of housing in the District, is neither specific nor limited to Brown Edge. Other areas within the Staffordshire Moorlands are previously developed or low quality grey belt land. The Staffordshire Moorlands Local Plan identifies a number of small sites not within the Green Belt which have development potential. Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas. A target of 20 new homes was set for Brown Edge in the Local Plan, to be built by 2033; a number reached, exceeded, and surpassed.

DOCUMENTED CONTRADICTIONS

The following 1 and 2 SMDC documents substantiate that the proposed site is Green Belt. Document 3 (submitted by the applicant with the current application) directly undermines Document 1.

1. APPLICATION DET/2021/0026 - DELEGATED REPORT 2 02/09/2021

- PROPOSAL The proposed use of the barn is stated as: to facilitate the breeding and rearing of pedigree alpacas and to store some of the 120+ bales of haylage cropped from the land each year.
- PRINCIPLE OF DEVELOPMENT The site is in the open rural countryside in a location where the landscape is assessed as being of high quality (ranked at level four on a five point scale where five is highest) on the basis of the Staffordshire county-wide landscape assessment. This site is in the Ancient Slope and Valley Farmlands landscape character type. It is also within the North Staffordshire Green Belt.

2. ENFORCEMENT SME/2026/00005 (A & B) 30/04/2026

These notices were issued by the Head of Development Services on behalf of SMDC a week later than SMD/2026/0201 was submitted. Both quote extensively how one building on the same site as the application contravenes both the National Planning Policy Framework and the Staffordshire Moorlands Local Plan:

'A'

- 4.5 - The land sits in open countryside within "Ancient Slope and Valley Farmlands" within the Green Belt.
- 4.6 - The private way and hard standing encroach into undeveloped Green Belt land and constitutes encroachment.
- 4.7 - The building is harmful to the Green Belt and should not be approved, conflicting with relevant parts of Policy SS10 of the Staffordshire Moorlands Local Plan and policies within the Framework.
- 4.8 - (i) Policy SS10 sets out the spatial strategy and says these areas will only provide for developments with exceptions which this development does not meet. and (ii) The harmful effect in conflict with Policies SS10, DC1 and DC3 of the Staffordshire Moorlands Local Plan and the Framework

- 4.9 - The Council concludes that planning permission should not be given, given the conflicts to the Local Plan and Framework, and that planning conditions could not overcome these objections.

'B'

- 4.4 - (as 4.5 SME/2026/00005'A' above)
- 4.7 - The development does not preserve openness, results in encroachment, and has no other Special circumstances which outweigh Green Belt and other harm, and conflicts the relevant parts of Policy SS10 of the Staffordshire Moorlands Local Plan and policies contained within the Framework.
- 4.8 - (as 4.5 SME/2026/00005'A' (i) above) the building introduces incongruous, harmful Development conflicting with Policy D3 of the Staffordshire Moorlands Local Plan.
- 4.10 - (as 4.9 SME/2026/00005'A' above)

3. APPLICATION SMD/2026/0201 13/05/2026 DEV-002-E BROWN EDGE BNG REPORT-V1

5.2 Baseline Condition Assessment

- Modified grassland (g4) ħ Poor condition ħ see 5.2.1; All of the grassland in G1, G2 and G3 failed Criterion A, and was assessed as ħPoor conditionħ.
- Modified Grassland (tall forbs) (g4.16) ħ Poor condition ħ see 5.2.2; An area of tall forbs (TF1) was therefore as ħPoor conditionħ.
- Bare ground (u510) ħ Poor condition ħ see 5.2.3 An area of bare ground (BG1) did not provide any vegetation, failed Criteria A and B and was assessed as ħPoor conditionħ.

These descriptions of the ground invalidate DET/2021/0026 set out in Delegated Report 2 ħThe proposed use as being: ħto facilitate the breeding and rearing of pedigree alpacas and to store some of the 120+ bales of haylage cropped from the land each year.ħ

ħ HOUSING

There is no demonstrable unmet need for the type of development proposed. With the figure of £80,000 annual salary stipulated by the government to be able to purchase affordable housing, a ceiling of approximately £376,100 could be borrowed. There are currently 17 properties for sale in Brown Edge on the open market up to the value of £400,000 (assuming 10% deposit is required). Some of these have been for sale since 2024/2025.

ħ SUSTAINABILITY

The proposed site is located in an unsustainable area. Travel by bus for work would prove impossible unless working ħoffice hoursħ en-route. Train stations are miles away and not served by a direct bus route. There is limited employment within walking or cycling distance of the village, particularly taking into account the steep hills in all directions. Most of the residents are already heavily reliant on private cars for the majority of their journeys, contrary to the environmental and transport objectives laid out in the Framework.

¿ CONCLUSION

I am unconvinced that the declassification of the proposed development from Green Belt to Grey Belt, conforms to Staffordshire Moorlands Local Plan and the National Planning Portal Framework nor do I consider the viewpoint of the Council particularly in PAD/2025/002 (Planning Statement Appendix A) that the site could be regarded as ¿Grey Belt¿. The site is functional Green Belt and fulfils its fundamental purposes by preventing urban sprawl and safeguarding the countryside from encroachment. Additionally there is adequate housing in the village including affordable residences. The proposal will place an unsustainable burden on local infrastructure of roads, drains, sewers, and water supply.

For these reasons, I urge the council to refuse this planning application

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