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From: [REDACTED]
Sent: 06 July 2026 17:37
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: Susan Turner Brenda

From:
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Submission: Objection

Comments: Planning Objection ė SMD/2026/0201 Land off Breach Road, Brown Edge Outline
planning application for up to 55 dwellings

To: Staffordshire Moorlands District Council Planning Department

I object to planning application SMD/2026/0201 for up to 55 dwellings on land off Breach Road, Brown Edge.

This is a substantial housing development on open agricultural land within the Green Belt. The proposal would extend built development beyond the established edge of Brown Edge and would cause unacceptable harm to Green Belt openness, rural character and the setting of the village.

The application should be refused for the following reasons.

1. Inappropriate development in the Green Belt

The site is within the Green Belt. The proposal is for up to 55 dwellings, together with estate roads, lighting, parking, gardens, drainage works and associated infrastructure. This would permanently urbanise open agricultural land.

Under the National Planning Policy Framework (NPPF), paragraph 152 states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Paragraph 154 confirms that new housing is inappropriate development unless it falls within specific exceptions, which this proposal does not.

The fundamental purpose of Green Belt policy, as set out in NPPF paragraph 143, is to prevent urban sprawl by keeping land permanently open. This proposal would do the opposite. It would push the built form of Brown Edge further into open countryside and would result in a clear and harmful encroachment beyond the village edge, contrary to Local Plan Policy SS6 (Development in the Green Belt).

2. Harm to Green Belt openness

The site is currently open grassland/agricultural land. A development of up to 55 homes would inevitably have a major visual and spatial impact. The loss of openness would not be temporary or minor; it would be permanent and substantial.

NPPF paragraph 153 requires that substantial weight is given to any harm to the Green Belt, including harm to openness. The scale and form of this development would significantly reduce openness both spatially and visually.

Even at outline stage, the scale of development is clear. Roads, houses, driveways, domestic gardens, boundary treatments, lighting, play space and vehicle movements would fundamentally change the character of the land, contrary to Policy SS6 and Policy DC3 (Landscape and Settlement Setting).

3. The site should not be treated as harmless 'grey belt'

The applicant appears to argue that the land does not strongly contribute to Green Belt purposes and should therefore be considered grey belt. I strongly disagree.

This is not previously developed land. It is open agricultural land on the edge of the village. It contributes to Green Belt purposes set out in NPPF paragraph 143, particularly preventing the unrestricted sprawl of large built-up areas and safeguarding the countryside from encroachment.

Even if the Council were to consider the site as grey belt, that does not override the requirement in NPPF paragraphs 152-153 to give substantial weight to Green Belt harm. The Council must still consider the full planning balance, including Local Plan Policy SS6, landscape harm under Policy DC3, infrastructure impact and whether the development would undermine the long-term function of the Green Belt.

4. Urban sprawl from Brown Edge

The proposal would represent a significant outward expansion of Brown Edge into open countryside. This is not a small infill plot or rounding-off exercise. It is a major residential estate of up to 55 dwellings.

This conflicts directly with NPPF paragraph 143, which seeks to prevent urban sprawl, and with Local Plan Policy SS1 (Development Principles), which requires development to be located within defined settlement boundaries unless justified.

The development would create a new suburban edge on land that is currently rural and open. This would weaken the defensible boundary of the village and increase pressure for further development on adjoining Green Belt land in future, contrary to Policy SS6.

5. Harmful precedent

If this application is approved, it would set a damaging precedent for further speculative housing schemes around Brown Edge. The Green Belt would be weakened incrementally, one site at a time.

NPPF paragraph 141 emphasises that Green Belt boundaries should only be altered through the plan-making process. Allowing this development through a speculative application would undermine that principle and conflict with the strategic approach set out in Local Plan Policy SS6.

The Council should not allow Green Belt boundaries to be eroded through speculative outline applications. Any major Green Belt release should be considered through the proper Local Plan process, with full assessment of alternatives, infrastructure, cumulative impact and community need.

6. Conflict with the character of Brown Edge

Brown Edge has a distinct rural village character. The proposed development would introduce a substantial estate-style housing scheme onto open land at the edge of the settlement.

This would harm the rural approach to the village and would be out of keeping with the existing countryside setting, contrary to Local Plan Policy DC1 (Design Considerations) and Policy DC3 (Landscape and Settlement Setting), which require development to respect local character and landscape context.

The proposal would not conserve or enhance local character, contrary to NPPF paragraph 135.

7. Highway and access concerns

Breach Road is not suitable for a development of this scale without causing additional traffic pressure and highway safety concerns. Up to 55 dwellings would generate a significant number of additional daily vehicle movements.

This raises concerns under NPPF paragraph 115, which requires that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety or severe cumulative impacts on the road network.

The proposal must also comply with Local Plan Policy T1 (Development and Sustainable Transport), which requires safe access and appropriate mitigation of traffic impacts. A full and robust assessment is required.

8. Local infrastructure pressure

A development of this size would place additional pressure on local services, including schools, GP access, drainage, sewerage, public transport and local facilities.

NPPF paragraph 34 requires that plans and decisions ensure that infrastructure is available to support development. Local Plan Policy SS1 also requires that development is supported by adequate infrastructure.

Brown Edge should not be expected to absorb a major housing estate without clear evidence that infrastructure can cope.

9. Drainage and surface water

The Council should not approve the application unless it is fully satisfied that surface water and foul drainage can be safely managed without increasing flood risk or causing problems to existing residents and landowners.

This is required by NPPF paragraphs 173&175, which seek to ensure that development does not increase flood risk elsewhere, and Local Plan Policy DC7 (Flood Risk), which requires appropriate drainage solutions.

Open agricultural land currently absorbs rainfall naturally. Replacing it with roads, roofs, hardstanding and drainage infrastructure may increase run-off unless properly controlled. It should also be noted that gardens and land along Breach Road are known to suffer from flooding, and there are natural springs in and around the immediate area. These factors must be fully investigated and taken into account, as development could exacerbate existing flooding issues and disrupt natural water flows.

10. Ecology and biodiversity

The land is open countryside and may support wildlife, including birds, bats, small mammals and hedgerow habitats. Any approval before a full and rigorous ecological assessment would be premature.

NPPF paragraph 186 requires that planning decisions contribute to and enhance the natural environment, while paragraph 180 requires protection of biodiversity. Local Plan Policy NE1 (Biodiversity and Geological Resources) requires protection and enhancement of habitats.

The Council should ensure that existing hedgerows, trees, habitats and wildlife corridors are properly assessed and protected.

11. Outline nature of the application

Although this is an outline application, the principle of up to 55 dwellings is being decided now. The Council should not defer key concerns about landscape impact, density, drainage, ecology, highways and Green Belt harm to reserved matters.

NPPF paragraph 152 makes clear that inappropriate development in the Green Belt should not be approved except in very special circumstances. No such circumstances have been demonstrated.

The principle of development on this Green Belt site is unacceptable and conflicts with Local Plan Policy SS6.

Conclusion

For the reasons set out above, I respectfully request that Staffordshire Moorlands District Council refuses planning application SMD/2026/0201.

The proposal would cause unacceptable harm to the Green Belt, contrary to NPPF paragraphs 143 & 154 and Local Plan Policy SS6, result in urban sprawl beyond the established village edge, damage the rural character of Brown Edge, increase pressure on local infrastructure and set a harmful precedent for further Green Belt development.

Yours faithfully,

Mrs Susan Brenda Turner

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