



Staffordshire Moorlands Local Plan

Site Allocations Topic Paper – Biddulph

June 2018

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Introduction



1 Introduction

1.1 The purpose of this Topic Paper is to set out the process which the Council has gone through in evaluating and selecting sites for allocation in the Submission Version Staffordshire Moorlands Local Plan. It brings together information relating to the evidence base, information for sites considered for allocation through the various stages of Plan preparation and details the steps of each consultation and the decision made regarding sites in order to demonstrate that the Council has undertaken a comprehensive and robust assessment and consultation on all suitable sites having regard to the evidence base.

1.2 The Paper covers the following allocations: residential, industrial/business, gypsy and travellers, open space and retail.

1.3 The Topic Paper is supported by the Site Proformas for the residential and mixed use allocations and the Consultation Statements.

1.4 The Site Proformas contained within Chapters 9 and 10 have been prepared for individual sites and provide details of the key issues affecting the site, a summary of the relevant information from the evidence base, summary of the responses and the Council response to the consultations and details of why sites were taken forward or dropped. There are site proformas for all sites in the Local Plan, the Omission sites (i.e. sites suggested for inclusion in the Submission Version Plan during the statutory period for representations) and sites which were included in the Preferred Options Sites and Boundaries consultation 2016 but were not taken forward.

1.5 The Consultation Statements provide details of the responses to each consultation stage and the Council's reply.

Biddulph



2 Biddulph

2.1 Biddulph is the second largest town in the District. It has suffered from economic decline and includes the Biddulph East Ward, an area of high deprivation. The town centre has seen recent improvements due to proposals within the Biddulph Town Centre Area Action Plan coming to fruition. The proposed strategy for Biddulph seeks to further enhance its role as a significant service centre and a market town.

2.2 The Local Plan defines the extent of the town development boundary (shown on the Policies Map). Due to the extent of green belt around the town, opportunities for peripheral expansion are constrained. A District wide Green Belt Review has been undertaken by the Council and this recommends areas around Biddulph which could be considered for release in exceptional circumstances. The Core Strategy recognised that a review of the Green Belt was necessary in order for Biddulph to accommodate the identified development requirements for the town.

2.3 The Retail Study (2013) recommends the allocation of a site in Biddulph to accommodate a discount foodstore of around 1000m² (net sales) to claw back some of the 45% of residents who shop out of town for their main food shopping. The study identifies outflow to mainstream and discount foodstores. It is considered that a discount store would provide the local population with more choice as due to closures of other stores, Sainsburys is now the only mainstream foodstore in the town. The study identifies land west of the bypass (in an edge of centre location) as the only area with capacity and with appropriate linkages to the town centre.

2.4 In order to meet the requirements for Biddulph, two key mixed-use development areas are identified. The Wharf Road Strategic development site will help to support a significant degree of the future housing land supply for the town as well as accommodating additional retail and employment development and supporting infrastructure. Much of this area was previously identified as a Broad Area in the Core Strategy for mixed-use development, however, this has now been extended to include additional land alongside the bypass and to the west of the Biddulph Valley Way on land included within the Green Belt. A further mixed-use site for employment and housing opposite Victoria Business Park has also been identified for housing and employment. This site will also require the release of Green Belt land. Elsewhere, the regeneration of mills in the town will further support the sustainability of the town.

2.5 The identification of sites and proposals for improved or new recreational and sports facilities and for additional or improved educational and health facilities and services will emerge from current studies and through discussions with service providers.

2.6 In order to manage surface water discharge rates into the waste water network in the Biddulph area, the use of Sustainable Urban Drainage Systems should be applied along with DEFRA's non-statutory technical standards.

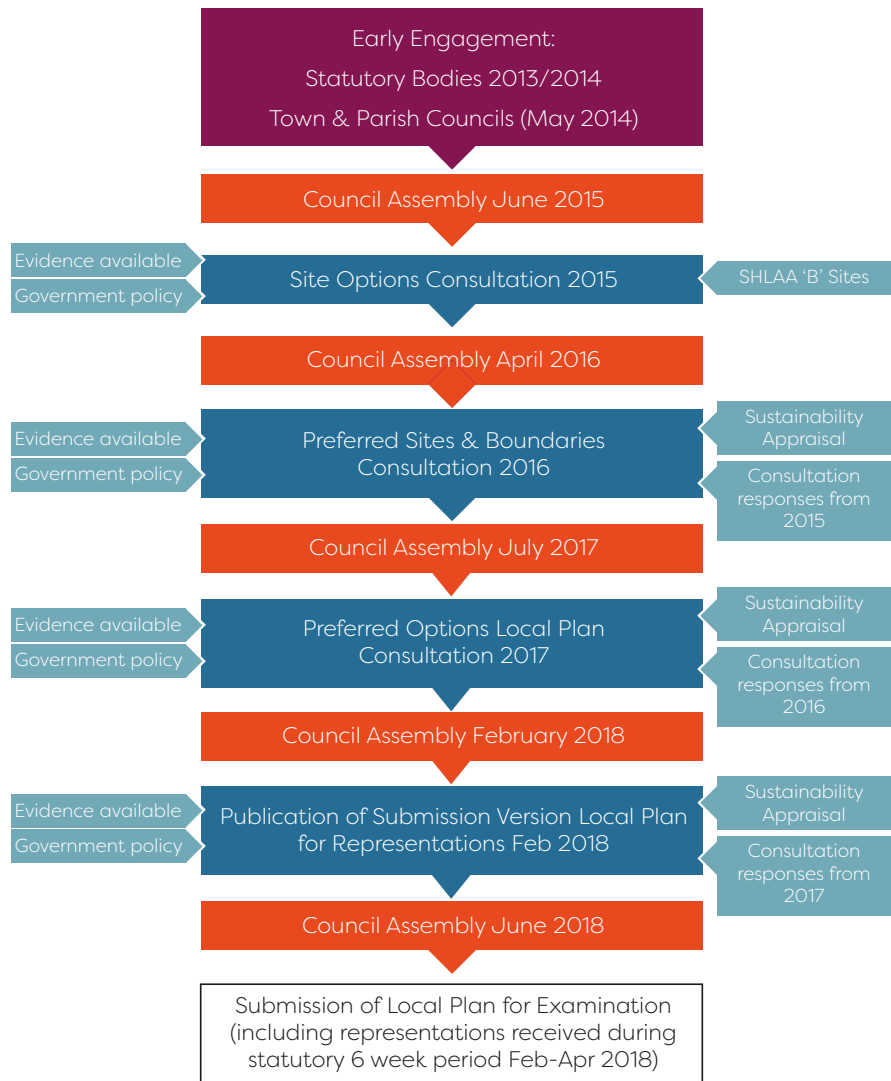
The Site Allocation Process



3 The Site Allocation Process

3.1 The Local Plan has undergone an extensive process of site selection and assessment during its preparation. Site selection has been informed by consultation responses from the public and stakeholders, information from the evidence, the Sustainability Appraisal and the historic, ecological, landscape characteristics and statutory designations within the area.

Site selection process



Picture 3.1 Site Selection Process Diagram

3.2 There were three key stages of public consultation to help identify sufficient land capable of being delivered for development and inform the Local Plan policies.

3.3 The purpose of the consultations was to invite comments on a range of potential sites to inform the Council decision on which sites to allocate for development in the Submission Version Local Plan. The consultations provided details of a number of sites across the District and also provided an opportunity for suggestions to be made for other sites which may not already have been considered. Sites were either taken forward to the next stage or dropped depending on the outcome of the consultations, information from the evidence base and any other relevant information at the time.

3.4 The Council carried out early engagement with key statutory bodies and Parish and Town Councils in 2013 and 2014 and undertook three consultations leading up to the publication of the submission version of the Local Plan:

- **Site Options consultation** 6 July - 14 September 2015
- **Preferred Options Sites and Boundaries consultation** - 28 April - 13 June 2016
- **Preferred Options consultation** 31 July - 22 September 2017

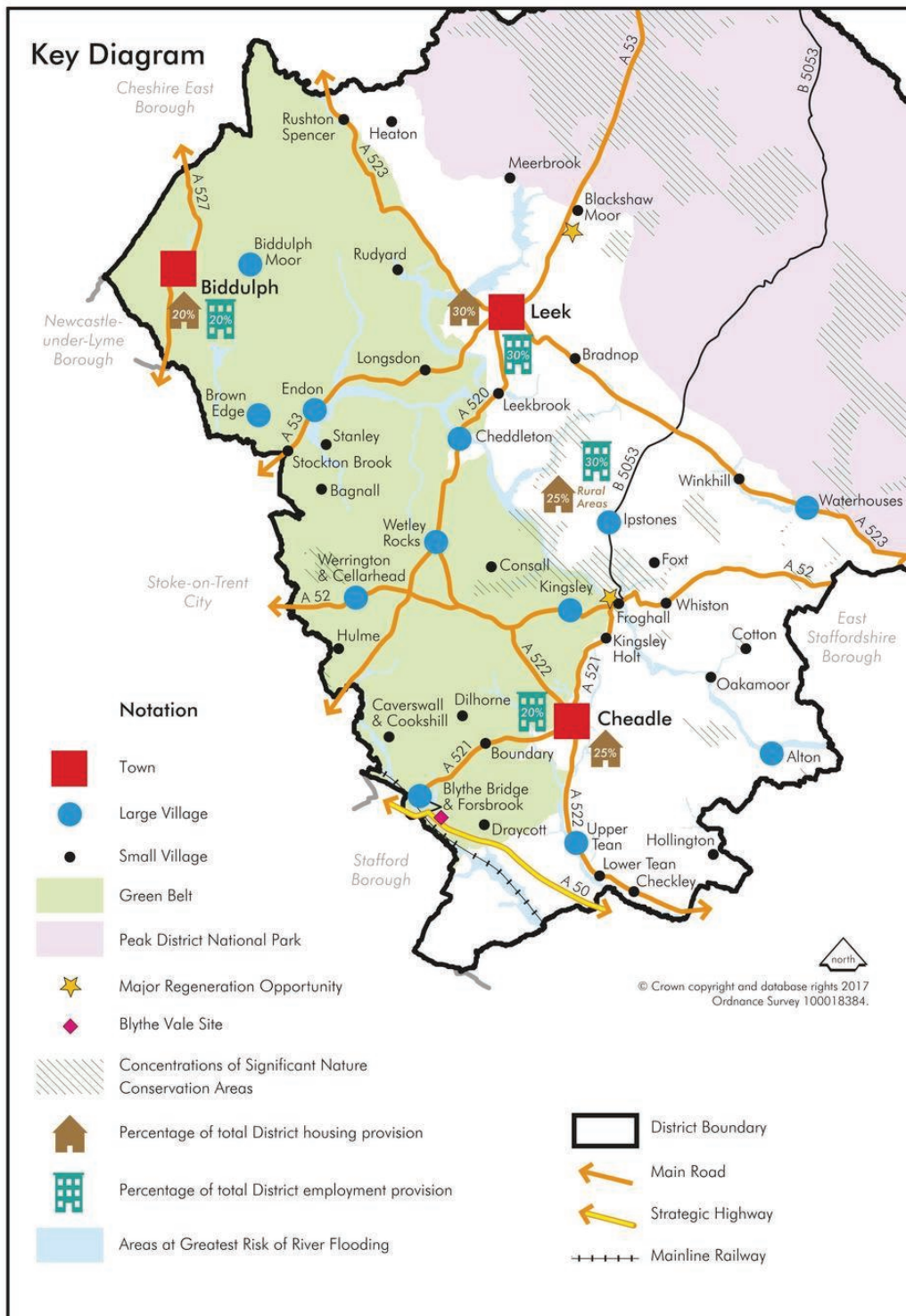
3.5 The site allocation process has also been informed by the consultation with specific statutory bodies and organisations and workshops with District Council and Parish Council members. The Duty to Cooperate Statement (Doc 9.1 and 9.2 in the examination library) details the work undertaken under the Duty to Cooperate and includes Statements of Common Ground with other authorities.

3.6 Comments raised by the public and stakeholders have been taken into account in appraising the sites and ultimately in arriving at the site allocations. Further details on the consultation process are set out in the Consultation Statements.

3.7 European and National legislation requires local planning authorities to undertake a Strategic Environmental Assessment, Sustainability Appraisal and Appropriate Assessment under the Habitats Regulations to inform the decision making and ensure that sustainability and biodiversity objectives have been addressed. A Sustainability Appraisal has been prepared which has informed the selection of sites in the Local Plan.

3.8 The Habitats Regulation Assessment considers the impact of the Local Plan on sites designated under European legislation for their nature conservation value to determine whether or not significant effects are likely as a result of the Plan.

3.9 Staffordshire Moorlands is located in north-east Staffordshire and a third of the District lies inside the Peak Park - the Peak District National Park Authority represents the special interests of this park. The landscape is characterised by attractive countryside comprising of farmland, extensive woodland areas, natural grassland and moors interspersed by distinctive settlements. The District has a wealth of heritage assets and biological and geological resources many of which are statutorily protected. A third of the rural area is covered by Green Belt. The site selection process had to take account of the sensitivity of the green belt and historic and nature conservation designations.



Picture 3.2

The Evidence Base

3.10 The Council aimed to ensure that the emerging Local Plan was based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. The evidence base provided information regarding the needs of the district in terms of housing, employment, retail, education and open space and information regarding the characteristics of the District.

3.11 A number of evidence based studies have been prepared to inform the Local Plan and selection of sites. These provide details of the level of development needed during the plan period, and an assessment of key constraints and information about the District:

3.12 The key documents from the evidence base are detailed below.

3.13 Strategic Housing Market Assessment (SHMA) (2014) - examination library ref 27.1 - One of the key requirements for a Local Plan is identifying the housing requirement for the area through the Strategic Market Assessment and to provide adequate sites to accommodate this need. The SHMA provided a comprehensive assessment of housing in the District and looked at;

- defining the housing market area
- market signals and the current and future housing market
- an objective assessment of housing need and a recommendation of an OAN range
- affordable housing - need, supply and requirements
- key issues for future policy

3.14 The June 2014 SHMA projections indicated a need for housing between the range of 260 – 440 dwellings per annum (dpa). This study has been updated four times to take account of new information.

- **August 2014 Update - examination library ref 27.2;** to take account of 2012 based sub national population projections. It gave an OAN of 210-430 dpa.
- **July 2015 Update - examination library ref 27.3;** to take account of 2012 based sub national household projections and 2011 census data. It gave an OAN of 220-460 dpa.
- **January 2016 Update - examination library ref 27.4;** to take account of 2014 mid year population estimates and case law relating to OAN. It gave an OAN of 250- 440 dpa.
- **February 2017 Update - examination library ref 27.5 and 27.6;** Updated the June 2014 SHMA and took account of the 2014 based sub national population projections and 2014 based household projections. It gave an OAN of 235-330 dpa.

3.15 Employment Land Study (July 2014) - examination library ref 17.3 - The Study covers the period 2011-2031. It provided five scenarios based on different modelling approaches and concluded that Staffordshire Moorlands required between 25ha and 45ha of employment to meet employment land needs for the period 2011 to 2031. 35% for B1a/B1b office, 40% for B1c/B2 industrial and 25% for B8 storage and distribution.

- The Study was updated in **September 2014 - examination library ref 17.4** - to take account of the 2012 based sub national household projections. It found between 26.36ha to 38.81ha would be required to support 210- 430 homes per year.
- It was further updated **February 2017 - examination library ref 17.5** - to incorporate more recent data releases, to align with the updated SHMA and reflect the changing economic context post Brexit. It concluded that 13 to 27ha of additional employment land was required for the period 2016-2031.

3.16 Updated Gypsy and Traveller Needs Assessment (2015) - examination library ref 18.2 - Assessed the need for the provision for sites (pitches) for gypsy travellers including transit pitches, and plots for travelling showpeople. It concluded there was a need for 6 residential pitches in Staffordshire Moorlands; zero transit pitches and zero plots for showpeople for the period 2014-2019. A further two residential pitches are estimated to be required beyond this to 2034.

3.17 Retail Study (October 2013) - examination library ref 25.1 - The Study updated the 2008 Retail Study and looked at establishing the shopping and leisure patterns, town centre floorspace composition and assessed the future quantitative and qualitative needs of the District and provided strategic advice on development strategies for the town centres. It's key recommendations were provision of a new deep discount foodstore in Biddulph, discontinuing the use of secondary frontages and making some changes to the town centre boundaries.

- It was updated in **November 2017 - examination library ref 25.3** - to review the 200m² impact threshold recommended in the 2013 study. This review confirmed that the impact threshold is appropriate and informed by robust evidence.

3.18 Level 1 Strategic Flood Risk Assessment (SFRA) (2015) - examination library ref 28.1 - This provides an assessment of the extent and nature of the risk of flooding across the District. The Level 1 Strategic Flood Risk Assessment (SFRA) assesses and maps all forms of flood risk from groundwater, surface water, sewer and river sources. It also takes account of future climate change predictions.

3.19 Ecological Surveys 2010/2011 (Staffordshire Wildlife Trust) - examination library ref 14.10 - provided a comprehensive ecological desk top study, and phase 1 habitat survey of areas considered for development ("broad areas") for Leek Biddulph and Cheadle in the emerging Core Strategy. Each record contained summary recommendations in the event of future development.

3.20 Ecological Study (Lockwood Hall) (2015) - examination library ref 14.1 - 14.6 - Provided Extended Phase 1 habitat surveys for the majority of sites identified in the later 2015 Site Options consultation, evaluated the relative ecological importance of each site, then provided site recommendations and conclusions for surveys/actions prior to any subsequent development.

3.21 Extended Phase 1 Habitat Surveys and Local Wildlife Site (LWS) Assessments (Ecus) (August and November 2017) - examination library ref 14.7 - 14.8

- These studies provided Extended Phase 1 habitat surveys of potential site allocations in the 2016 Preferred Options (that had not already undergone assessment by Lockwood Hall); followed by assessment of all sites in the 2016 Preferred Options consultation for their potential to be designated as local wildlife sites (LWSs) (ie Site of Biological Importance (SBI) or Biodiversity Alert Site (BAS)) according to criteria outlined in 'Guidelines for the selection of sites of county biological importance in Staffordshire' (Webb et al., 2014).

3.22 In addition Ecus conducted a **Preliminary Ecological appraisal** (including reptile and bat surveys) of the area covered by the Council's **Cornhill Regeneration Area illustrative Masterplan May 2016**. This was published in July 2017 - **examination library ref 14.9**.

3.23 Cheadle Town Centre Transport Study 2015 - examination library ref 31.6 - and Phase 2 Assessment 2017 - examination library ref 31.7 - assessed the characteristics of the existing highway network across the town and identified locations/routes that would be affected by additional housing and employment land provision and assessed what impacts the resultant traffic increases around the town might have on journey times, queuing and delay. It suggested further actions and mitigation measures which were considered in more detail in the **Phase 2 Assessment 2017**.

3.24 Green Belt Review (2015) - examination library ref 22.4 - The Study provided a strategic review of the Green Belt in the District and a more detailed site based assessment of sites included in the Site Options consultation with recommendations regarding the suitability of sites for release from the Green Belt. It concluded the general extent of the Green Belt should be retained but identified some small sites as suitable for release in exceptional circumstances through a Local Plan review as required by the NPPF.

- A number of additional sites were assessed in the **September 2016 - examination library ref 22.4** - and **April 2017 - examination library ref 22.7** -updates.

3.25 Strategic Housing Land Availability Assessment (SHLAA) 2015 - (examination library refs. 26.1 - 26.4) - provided details of potentially deliverable sites.

3.26 Green Infrastructure Strategy 2018 - examination library ref 22.10 - Identifies a network of strategic green infrastructure. The strategy seeks to create functional and physical connectivity between green spaces, as well as to identify opportunities to provide additional green routes and ecological networks.

3.27 The Playing Pitch Assessment 2017 - examination library ref. 23.4 - presents a supply and demand assessment of playing pitch and other sports facilities in accordance with Sport England's Playing Pitch Strategy Guidance. The resulting **Playing Pitch Strategy and Action Plan 2017** (examination library ref. 23.3) provides a strategic framework that ensures the provision of outdoor sports facilities meets the local needs of existing and future residents.

3.28 Open Space Study - Update Report 2017 - examination library ref. 23.1 - provides detail with regard to what provision exists in the area, its distribution and general quality. The follow-on **Open Space Standards Paper 2017 - examination library ref 23.2** - identifies the deficiencies and surpluses in existing and future open space provision and sets provision standards focusing on quantity, quality and accessibility.

3.29 Local Plan and Site Allocations Viability Study 2018 - examination library ref. 24.1 - provides an assessment of the overall viability of development in the District, considering the viability implications of emerging plan policies. It also provides a viability framework within which to consider the proposed site allocations. Ultimately the study provides conclusions about 'whole plan viability' and deliverability.

3.30 Development Capacity Study 2009 (updated in 2010/2011) - examination library refs 21.1 - 21.6 - Considers the capacity of settlements to support development in terms of availability of services and infrastructure. Stage 1 examined the level and capacity of existing infrastructure and facilities (including social, physical infrastructure) and accessibility. Stage 2 assesses the viability of development sites. Stage 3 appraises the potential impact of changes to the affordable housing targets.

3.31 The Infrastructure Delivery Plan Baseline Report - examination library ref 8.1 - was published in 2016. The **Infrastructure Delivery Plan February 2018 - examination library ref 8.2** - considers current and future infrastructure requirements to support the planned growth in the Local Plan. Examines the quality and capacity of transport, education, utilities, telecommunications, flood risk and drainage, waste management, green infrastructure, sport leisure and recreation, health, emergency services and community and cultural provision.

3.32 Landscape and Settlement Character Assessment 2008 - examination library ref 22.1 - Identified ten landscape character types across the District and set out the planning implications for development within each of them. Some landscape character types were deemed to be more sensitive to changes than others but the study did not quantify limits to development potential.

3.33 Landscape, Local Green Space and Heritage Impact Study 2016 - examination library ref 22.5 - assessed the landscape sensitivity of proposed development site allocations, assessed the potential heritage impacts of proposed development allocations and reviewed the existing Visual Open Space designations to consider sites against Local Green Space criteria.

3.34 A number of additional sites were assessed in the **October 2017** update - **examination library ref 22.8**.

3.35 Sustainability Appraisals (SA). This was an ongoing process through out the preparation of the Local Plan. The purpose of SA was to promote the objectives of sustainable development within planning policy by appraising the social, environmental and economic effects of a plan from the outset to ensure that sustainable development is treated in an integrated way in the preparation of the Plan.

- Sustainability Appraisal Scoping Report 2014 - **examination library ref 6.1**
- Initial Sustainability Appraisal Report 2016 - **examination library ref 6.2**
- Draft Sustainability Appraisal Report 2017 - **examination library ref 6.3**
- Submission Version Sustainability Appraisal Report February 2018 - **examination library ref 6.4**
- Final Sustainability Appraisal Report June 2018 - **examination library ref 6.5**

3.36 Habitats Regulations Assessment

- Habitats Regulations Assessment Local Plan Preferred Options July 2017 -**examination library ref 7.1**
- Habitats Regulations Assessment Local Plan Submission version February 2018 - **examination library ref 7.2**
- Habitats Regulations Assessment Local Plan Submission version Addendum June 2018 - **examination library ref 7.3**

3.37 Consultation Statements; Summarised the responses to the consultations:

- Staffordshire Moorlands Local Plan Consultation Statement 2016 (Preferred Options and Boundaries) and 2015 Site Options) Submission Version February 2018 - **examination library ref 5.1**
- Staffordshire Moorlands Local Plan Consultation Analysis Report (Preferred Options) 2017 consultation January 2018 - **examination library ref 5.2**
- Staffordshire Moorlands Local Plan Consultation Analysis Report 2018 - **examination library ref 5.3**

The Strategic Housing Land Availability Assessment (SHLAA)



4 The Strategic Housing Land Availability Assessment (SHLAA)

4.1 The starting point in the site selection process was the SHLAA. The SHLAA Scoping Report was published for consultation in March 2007 and the SHLAA was first published in October 2012. It was updated in July 2015 to support the Site Options consultation 2015.

4.2 The SHLAA provides details of potential deliverable housing sites in Staffordshire Moorlands and forms an important part of the evidence base. (It contained a database of over 2000 sites in 2015 - the number of sites will vary over time as the database is kept under review). Sites were assessed against a range of factors. All sites were mapped and an initial assessment was made of each site in terms of:

- **Availability** - is the site available for development?
- **Suitability** - based on the type of land, planning policy designations, planning status of the site, its use, surrounding land uses and characteristics, identifiable physical constraints and environmental and sustainability impacts.
- **Viability** - based on cost assumptions and development site values based on development assumptions.

4.3 The sites were classified as being either:

- **Deliverable (A site)** - Sites with planning permission and a reasonable prospect housing will be delivered in 5 years.
- **Developable (B site)** - Developable within 15 years in a suitable location and viable with no known significant constraints.
- **Undevelopable (C site)** - No or limited development potential (Unavailable and / or, unsuitable and / or, unviable).

4.4 The SHLAA included settlements based on the settlement hierarchy in the adopted Core Strategy and included the towns, larger and smaller villages. It also included committed and potential development areas outside of the settlements including land within the Green Belt.

4.5 The SHLAA (July 2015) found:

- A supply of land for 2,628 homes within the next five years (based on completions and commitments) - 80% on brownfield, conversion or partial brownfield sites and 81% within the urban area.
- A potential supply of land for 11,406 homes within six to fifteen years - 14% on brownfield, conversion or partial brownfield sites and 24% in urban areas
- A total potential supply of land for 14,029 homes

4.6 The SHLAA compared the potential supply of housing land against the housing requirement and spatial distribution set out in the Core Strategy. It found that there was more than double the supply of potential housing sites to meet the 6000 (300 per year) housing requirement in the Core Strategy.

Area	Amount	Required Provision	Completions and Commitments	Additional Developable Large SHLAA sites	Total Potential Supply
Leek	30%	1,800	1,090	2,716	3,806
Biddulph	20%	1,200	386	1,710	2,096
Cheadle	22%	1,320	285	3,428	3,713
Rural Areas	28%	1,680	862	3,552	4,414
Total		6,000	2,623	11,406	14,029

Table 4.1 SHLAA potential land supply and Core Strategy requirements

4.7 However it is important to acknowledge that these findings did not take account of policy constraints such as Green Belt and it is for the Local Plan to determine which sites are most suitable to meet the District's housing needs through the Local Plan preparation process i.e. the results of consultation and balancing the evidence base. The SHLAA is a broad brush approach which provides a general overview of potential development capacity in the District and a starting point for site selection. More detailed information regarding sites became available during the Plan preparation which further informed site selection.

Gypsies & Travellers



5 Gypsies & Travellers

Identification of Potential Allocations

5.1 In response to para 17 NPPF/para 10 Planning Policy for Traveller Sites(PPTS), the Council has undertaken the following:

5.2 In February 2011 the Council published a Gypsy and Traveller 'Issues and Options' paper which sought stakeholder views on both the best methodological approach at identifying future traveller sites; and sought suggestions for actual sites. These, alongside other possible options throughout the District generated by officers or suggested by Council Members, underwent a series of appraisals to assess their general suitability against sustainable development; including an assessment against the locational criteria of Core Strategy Policy H3; additionally site options were assessed as part of the sustainability appraisal of the Local Plan. These included consideration of site availability where landowner position was known. Contact was made with owners of potentially suitable sites but no willing land owners were identified.

2015 Site Options Consultation

5.3 During the preparation of the Local Plan since 2014, the Council has conducted a number of public consultations where suggestions for alternative sites for different land uses have been entertained, including a 2015 Site Options 'Call for Sites'. These also provided an opportunity for landowners of existing 'options' to confirm their position. The Derbyshire Gypsy Liaison Group responded to the 2015 consultation on behalf of a site in Checkley with the owners proposing this for allocation. This site has subsequently been granted permanent planning permission (at that time it only enjoyed temporary permission).

2016 Preferred Option Sites and Boundaries Consultation

5.4 Having reviewed site suitability and potential availability, the Council decided that out of the site options deemed 'deliverable' – to proceed with a single traveller site at Blythe Bridge ("TR002") as a proposed allocation in the subsequent 2016 Preferred Options Sites and Boundaries public consultation. OANs for traveller pitches can be satisfied on one or more sites and this site was deemed capable of accommodating at least eight residential pitches ie meeting the GTAA needs of the whole District. Although the site falls within the Green Belt, it abuts the Blythe Bridge boundary; and the Green Belt Review recommended that the site had limited contribution to NPPF Green Belt purposes, and it could be considered for release under Exceptional Circumstances (accompanied by extension of the Village Boundary).

5.5 The owners of suggested site TR002 Blythe Bridge responded to the 2016 Preferred Options Sites and Boundaries public consultation to clarify that their site was not in fact available for traveller use. No further sites were suggested by landowners during this consultation (the Derbyshire Gypsy Liaison Group repeated their 2015 representation).

Public Sector Land

5.6 Since 2016 the Council has explored whether public sector bodies (including SMDC, SCC, DCLG, and Government Property database) had any suitable landholdings that may be available, either within or adjacent to the District. After excluding sites that were practically unsuitable or too small (eg public parks, road verges, railway sidings etc), and sites known to be unavailable, this elicited a small number of extra SMDC-owned sites in the District that

were also appraised against Policy H3 criteria. These included small pockets of industrial land within Leekbrook industrial estate affected by floodzone 2 or 3; and land at Wetley Moor SSSI in the Green Belt. Neither of these were considered suitable (and upon investigation, were not available), so were not taken forward into the Submission Version Local Plan.

5.7 As part of its Duty to Cooperate under the Localism Act the Council investigated with neighbouring authorities (party to the Joint Gypsy and Traveller Needs Assessment) the scope for provision of some/all of SMDC's residual requirement within neighbouring authorities. This did not elicit any positive responses, given the stages of preparation of adjacent authorities' Local Plans.

5.8 In April 2017 the Council's Executive Director wrote to the Head of Property at SCC to ascertain whether the County had any landholdings that would be available for this purpose. This did not elicit a positive response.

5.9 Given the relatively modest residual pitch requirement for the Staffordshire Moorlands; the retained criteria-based policy for determining applications, and the extensive efforts made by the Council in finding alternative sites, the Council considers that it has made every effort in meeting its traveller accommodation OAN for the District as per para 17 NPPF and para 10 etc PPTS.

Site Options Consultation 2015



6 Site Options Consultation 2015

Early Engagement with Statutory Bodies

6.1 In 2013 and 2014, the Council held informal consultation with key statutory bodies to seek initial views on the suitability of a number of sites for development and whether they considered there to be any issues which would affect their delivery. The Council used the information gathered to inform the selection of 'options' for each settlement.

Early Engagement with Parish and Town Councils

6.2 Prior to the Site Options Consultation, the Council also undertook early engagement with Town and Parish Councils within the Staffordshire Moorlands Planning Area in May and June 2014. All Parish and Town Councils were invited to attend a Special Meeting of the Parish Assembly on 8th May 2014 and 46 Councillors attended.

6.3 At the meeting Councillors requested copies of the maps and other site information to allow for further opportunities to discuss the draft proposals at an early stage with the rest of their Parish / Town Council. Consequently, a pack of information was sent out to each Parish and Town Council (stating its confidential nature) including:

- A letter asking Parish Councils to make general comments about the sites, (not if they should or should not be developed);
- Background information - the stage in the Local Plan production process, requirements, process for site selection and individual site sheets; and
- Map of their Parish indicating potential sites, development boundary, green spaces, flood risk, TPOs, Nature conservation sites, Conservation area and any major commitments.

6.4 Comments received were considered and reported to the LDF Working Party along with the notes and comments from the Council Assembly Workshop on the 8th May 2014.

Site Options Consultation 2015

6.5 The Site Options consultation was carried out from 6th July to 14th September 2015. The consultation was approved by Council Assembly on 15th June 2015. It sought views on a number of key issues:

- site options for housing, employment and mixed use
- development/infill boundaries for the towns and villages listed in the Core Strategy
- open space
- draft town centre boundaries and primary and secondary shopping frontages (towns)
- broad policy areas for review
- a call for sites for all land uses

- comments on the Strategic Housing Land Availability Assessment (SHLAA)
- changes to the Statement of Community Involvement 2014

6.6 The consultation was supported by documents in the evidence base that were available at the time which were as follows:

- Strategic Housing Market Assessment (SHMA) (2014)
- Employment Land Study (2014)
- Retail Study (2013)
- Strategic Housing Land Availability Assessment (SHLAA) (2015)

6.7 At the time of the Site Options consultation the Council was also in the process of working on and commissioning additional evidence to support the Local Plan as follows:

- Updated Gypsy and Traveller Needs Assessment
- Level 1 Strategic Flood Risk Assessment (SFRA)
- Ecological Study
- Cheadle Transportation Study
- Green Belt Review
- SHMA Update July 2015
- Sustainability Appraisal Report July 2016

Residential Allocations

6.8 The proposed residential sites were taken from the SHLAA and included all B sites - sites categorised as being developable within 15 years in a suitable location and viable with no significant constraints.

6.9 The site options consultation provided details of potential residential sites in Biddulph. A total of 25 sites (with a capacity of 10 or more dwellings) were consulted on. These were broken down by location (7 in the existing development boundary, 1 an urban extension allocated in the adopted Core Strategy known as 'Broad Area 4' made up of 5 neighbouring sites on the west side of the bypass (BD071, BD071a, BD106, BD156 and BD055) and 17 sites in the Green Belt). An indicative requirement was given for each settlement based on the spatial distribution of development set out in Policy SS3 of the Core Strategy, population and facilities of the settlement and the amount of potential sites identified in the SHLAA.

6.10 Consulting on site options was a key stage in the preparation of the new Local Plan. The Site Options consultation involved inviting comments on a large number of potential housing sites. A 'call for sites' was also part of this consultation where suggested sites could be put forward for consideration. Comments were also invited on the published SHLAA, allowing parties to identify and corrections / inaccuracies in the data held.

6.11 The number of sites included in the consultation gave a wide choice regarding the location of future development and it was emphasised in consultation material that not all the sites included in this consultation were needed to meet the District's requirements and that the list would be refined following the consultation. The responses to the consultation together with the information from the evidence base, the findings of the Sustainability Appraisal and any other relevant information informed the selection of sites for the Preferred Options Sites and Boundaries consultation.

Post-Consultation Councillor Workshops

6.12 The responses to the consultation and an assessment of the sites were considered at member workshops in December 2015. New sites suggested in response to the consultation were also considered.

6.13 At each workshop, Councillors were provided with a set of tables - one for each settlement which contained a potential allocation in the Site Options Consultation.

6.14 The tables contained the following information:

- site reference number;
- capacity of site;
- a summary of key issues arising from the site options consultation;
- a summary from the Sustainability Appraisal;
- officer comments; and
- a draft officer recommendation for consideration.

6.15 The draft recommendation for each site was colour coded as follows:

6.16 Green – considered by officers to be suitable as a draft Potential Option Site. Few or no potential issues identified at this stage.

6.17 Amber – considered by officers to be suitable as a draft Reserve Site. Some issues may need resolving but may be still be suitable to meet identified need.

6.18 Red – considered by officers to be a constrained site. The site may be unavailable, or there may be significant issues around flood risk, highways etc or it is anticipated that there is sufficient capacity identified on existing sites with planning permission and/or the green/amber sites identified offer better potential.

6.19 White – Recommended by officers as infill. It was considered that some sites within the development or infill boundary could come forward as infill sites and therefore it is unnecessary to allocate them. It will be necessary to include these sites in a windfall allowance so that they still count towards the overall housing requirement.

6.20 Maps with the colour coded sites were also available at the workshops. As a result of the site options consultation and the Green Belt Review the Council assessed some additional sites that were considered to have potential. They were referred to as 'ADD sites'.

6.21 The sites were assessed with regard to the responses received from both the public and statutory bodies/stakeholders as well as information from the evidence base including the Sustainability Appraisal. At this time, the results of the Council's Green Belt Review were available (it was published in November 2015). The assessment took account of the findings and a number of sites were dropped as the Green Belt Review found them to be unsuitable for release from the Green Belt. The NPPF gives a high level of protection to the Green Belt so the recommendations of the Green Belt Review were a key factor in site selection. The Council made a balanced judgement based on the information available at that time.

6.22 If a land owner stated that their land was unavailable for development then it was automatically excluded from the process as the Council did not intend to compulsory purchase any sites to allocate in the Local Plan. The site selection process evolved at each stage as new or updated evidence was produced or other factors became known (like availability of land).

6.23 Sites were categorised as red, amber or green. The Consultation Statement regarding the Site Options 2015 consultation includes a summary of responses to sites. The table below summarises this and indicates which sites were taken forward to the Preferred Options Sites and Boundaries consultation in 2016.

6.24 A number of additional residential sites were suggested during the consultation. Not all of these were considered suitable for designating as additional housing sites either due to their size, location or development constraints. These are detailed in the Consultation Statement.

Site	Dwellings	Designation RAG	RAG classification	Sustainability Appraisal April 2016	Included in Preferred Options Sites & Boundaries
BIDDULPH					
BD004	15	In development boundary	Amber	The development of urban ALC land on a brownfield site is likely to have a significant positive effect, as could the site's proximity to existing areas of employment. The site should deliver a quantum of housing, circa 15 dwellings which is likely to have a positive effect. The site is located within the settlement boundary and has good accessibility to the services and facilities. However, its proximity to heritage assets would have a negative effect, as would the district ecological importance of the site.	No. Significant access issue and landowner intentions unclear.
BD016	20	In development boundary	Green	The site should deliver a quantum of housing, circa 20 dwellings which is likely to have a significant positive effect, as could the location of the site with regard to its proximity to services and facilities and areas of existing employment as well as the positive effect upon the landscape. The site is located within the settlement boundary and has good accessibility to health care services and facilities. However, its proximity to heritage assets would have a negative effect.	Yes. In settlement boundary, sustainable location, land available.
BD055	20	In development boundary	Green	The site should deliver a quantum of housing, circa 20 dwellings which will have a significant positive effect, as will the development of urban	Yes. In settlement boundary, sustainable location, land

Site	Dwellings	Designation RAG	RAG classification	Sustainability Appraisal April 2016	Included in Preferred Options Sites & Boundaries
BD059	12	In development boundary	White	ALC brownfield land as well as the positive effect upon the landscape. However, the sites proximity to heritage assets is assessed as a significant negative. The site is located within the settlement boundary and has good accessibility to services and facilities and areas of existing employment. However, the sites district ecological importance would have a negative effect. The development of urban ALC brownfield land should have a significant positive effect, as should the preservation of the landscape and the site's proximity to existing areas of employment and services and facilities. The site is located within the settlement boundary, and away from historical assets. However, the site's district ecological importance would have a negative effect.	available, has planning consent for extra care housing.
BD101	24	In development boundary	Amber	The development of urban ALC brownfield land should have a significant positive effect, as should the preservation of the landscape and the site's proximity to existing areas of employment and services and facilities and the delivery of circa 24 dwellings. The site is located within the settlement boundary, and away from historical assets. However, the site's district ecological importance would have a negative effect.	No. Availability unknown.

Site	Dwellings	Designation RAG	RAG classification	Sustainability Appraisal April 2016	Included in Preferred Options Sites & Boundaries
BD102	42	In development boundary	Amber	The development of urban ALC brownfield land should have a significant positive effect, as should the preservation of the landscape and the site's proximity to existing areas of employment and services and facilities and the delivery of circa 42 dwellings. The site is located within the settlement boundary, and away from historical assets. However, the site's district ecological importance would have a negative effect.	No specific allocation - included in windfall figure.
BD108	12	In development boundary	Green	The development of urban ALC brownfield land should have a significant positive effect, as should the preservation of the landscape and the site's proximity to services and facilities. However, there is scope that development of this site could have significant negative effects upon historical assets. Similarly, the site's district ecological importance would have a negative effect.	Yes. Sustainable location, adequate access, land available, could be part of a larger development scheme
BD071+BD071a+BD106+BD156	265	Potential Urban Extension (not Green Belt)	Green	The site's proximity to services, facilities and existing areas of employment and proposed delivery of circa 265 dwellings should have a significant positive effect. However, there is scope that development of this site could have negative effects due to the site's district ecological importance and the development of greenfield land.	Yes. Sustainable location, adequate access, land available, could be part of a larger development scheme.

Site	Dwellings	Designation RAG	RAG classification	Sustainability Appraisal April 2016	Included in Preferred Options Sites & Boundaries
BD062	40	Green Belt	Green (Land available, acceptable access, Green Belt Review recommends considering removal of site from Green Belt)	The proposed delivery of circa 40 dwellings should have a significant positive effect. The site is also accessible to existing services facilities and areas of employment which is likely to have a positive effect. However, the site's potential for protected species to be present due to the habitats present and its connection to the wider countryside are considered to have a significant negative effect. Similarly, the development of greenfield land, grade 4 ALC and the site's proximity to historic assets are also assessed as having a negative effect.	Yes. Land available, acceptable access, Green Belt Review recommends considering removal of site from Green Belt
BD063a	40 (reduced capacity to reflect contents of Green Belt Review)	Green Belt	Green	The proposed delivery of circa 120 dwellings should have a significant positive effect. The site is also accessible to existing services, facilities and areas of employment which is likely to have a positive effect. However, the site's district ecological importance is considered to have a negative effect. Similarly, the development of greenfield land, grade 3/4 ALC and the site's proximity to historic assets are also assessed as having a negative effect.	Yes. Land available, acceptable access could be created, Green Belt Review recommends considering removal of site from Green Belt.
BD064	12	Green Belt	Red (Green Belt Review recommends that the site is not considered for release from the Green Belt)	The site is accessible to existing services, facilities and areas of employment which is likely to have a positive effect. However, the site's district ecological importance is considered to have a negative effect. Similarly, the development of greenfield land, grade 4	

Site	Dwellings	Designation RAG	RAG classification	Sustainability Appraisal April 2016	Included in Preferred Options Sites & Boundaries
BD067a	120	Green Belt	Red	<p>ALC and the site's proximity to historic assets and the ecological status of the site are also assessed as having a negative effect.</p> <p>The proposed delivery of circa 150 dwellings is considered to have a significant positive effect. The site is accessible to existing services, facilities and areas of employment which is likely to have a positive effect. However, the site's district ecological importance is considered to have a negative effect. Similarly, the development of greenfield land, grade 4 ALC and the site's proximity to heritage assets is also assessed as having a negative effect.</p>	<p>No. Green Belt</p> <p>Review recommends that the site is not considered for release from the Green Belt.</p>
BD067b	150	Green Belt	Red	<p>The proposed delivery of circa 150 dwellings is considered to have a significant positive effect. The site is accessible to existing services, facilities and areas of employment which is likely to have a positive effect. However, the site's district ecological importance is considered to have a negative effect. Similarly, the development of greenfield land, grade 4 ALC and the site's proximity to heritage assets is also assessed as having a negative effect.</p>	<p>No. Green Belt</p> <p>Review recommends that the site is not considered for release from the Green Belt</p>

Site	Dwellings	Designation RAG	RAG classification	Sustainability Appraisal April 2016	Included in Preferred Options Sites & Boundaries
BD067c	120	Green Belt	Red	The proposed delivery of circa 120 dwellings is considered to have a significant positive effect. The site is accessible to existing services, facilities and areas of employment which is likely to have a positive effect. However, the site's district ecological importance is considered to have a negative effect. Similarly, the development of greenfield land, grade 4 ALC and the site's proximity to heritage assets is also assessed as having a negative effect.	No. Green Belt Review recommends that the site is not considered for release from the Green Belt.
BD068	70	Green Belt	Green	The proposed delivery of circa 70 dwellings is considered to have a significant positive effect, as could the site's proximity to existing areas of employment. The site is also accessible to existing services and facilities which is likely to have a positive effect. However, the site's is located within a flood zone which is likely to have a significant negative effect. Similarly, the district ecological importance is considered to have a negative effect, as could the development of greenfield land, grade 4 ALC and the site's proximity to heritage assets is also assessed as having a negative effect.	Yes. Land available, acceptable access, Green Belt Review recommends considering removal of site from Green Belt.
BD069	30	Green Belt	Green	The proposed delivery of circa 30 dwellings is considered to have a significant positive effect. The site is also accessible to existing employment areas which is likely to have a positive effect. However, the site's proximity to historic assets is assessed as having a	Yes. Land available, acceptable access could be created, Green Belt Review recommends considering removal

Site	Dwellings	Designation RAG	RAG classification	Sustainability Appraisal April 2016	Included in Preferred Options Sites & Boundaries
BD083	40	Green Belt	Red	<p>significant negative effect. The development of greenfield land and its location within a flood zone is also assessed as having a negative effect.</p> <p>The proposed delivery of circa 40 dwellings is considered to have a significant positive effect, as could the site's proximity to areas of existing employment. The site is also accessible to existing services and facilities which is likely to have a positive effect. However, the site is located within a flood zone which is likely to have a significant negative effect. The development of greenfield land, grade 4 ALC and the site's proximity to heritage assets and an LNR are assessed as having a negative effect.</p>	<p>of site from Green Belt, aware of possible heritage impact - study to follow.</p> <p>No. Green Belt</p> <p>Review recommends that the site is not considered for release from the Green Belt.</p>
BD087	25	Green Belt	Green	<p>The proposed delivery of circa 25 dwellings is considered to have a significant positive effect, as could the site's proximity to existing areas of employment. The site is also accessible to existing services and facilities which is likely to have a positive effect. However, the site is located within a flood zone which is likely to have a significant negative effect. The development of greenfield land, grade 4 ALC and the site's proximity to heritage assets and an LNR is likely to have a negative effect, as could the site's district ecological importance.</p>	<p>Yes. Land available, acceptable access could be created, Green Belt Review recommends considering removal of site from Green Belt.</p>

Site	Dwellings	Designation RAG	RAG classification	Sustainability Appraisal April 2016	Included in Preferred Options Sites & Boundaries
BD109 + BD118	32	Green Belt	Red	The proposed delivery of circa 26 dwellings is considered to have a significant positive effect. The site is also accessible to existing services, facilities and areas of existing employment as well as being located away from historic assets and a SSSI and LNR, as well as the site's low ecological value is likely to have a positive effect. However, the development of greenfield is assessed as having a negative effect.	No. Green Belt Review recommends that the site is not considered for release from the Green Belt.
BD110	50	Green Belt	Red	The proposed delivery of circa 50 dwellings is considered to have a significant positive effect. The site is also accessible to existing services, facilities and areas of existing employment as well as being located away from historic assets and a SSSI and LNR, as well as the site's low ecological value is likely to have a positive effect. However, the development of greenfield land is assessed as having a negative effect.	No. Green Belt Review recommends that the site is not considered for release from the Green Belt.
BD131b	80	Green Belt	Red	The proposed delivery of circa 80 dwellings is considered to have a significant positive effect, as could the site's proximity to existing areas of employment. The site is also accessible to existing services and facilities which is likely to have a	No. Land not available.

Site	Dwellings	Designation RAG	RAG classification	Sustainability Appraisal April 2016	Included in Preferred Options Sites & Boundaries
BD134	40	Green Belt	Red	<p>positive effect. However, the site is located within a flood zone which is likely to have a significant negative effect. The development of greenfield land is assessed as having a negative effect, as could the site's proximity to historic assets.</p> <p>The proposed delivery of circa 40 dwellings is considered to have a significant positive effect. The site is also accessible to existing services, facilities and existing areas of employment likely to have a positive effect, as could its distance away from historic assets. However, the development of greenfield land, grade 4 ALC is assessed as having a negative effect, as could the site's location within a flood zone 2 and 3 area and the district ecological importance of the site.</p>	<p>No. Green Belt Review recommends that the site is not considered for release from the Green Belt.</p>
BD138a	94	Green Belt	Red	<p>The proposed delivery of circa 90 dwellings is considered to have a significant positive effect, as could the site's proximity to existing areas of employment. The site is also accessible to existing services and facilities which is likely to have a positive effect, as could its low</p>	<p>No. Green Belt Review recommends that the site is not considered for release from the Green Belt.</p>

Site	Dwellings	Designation RAG	RAG classification	Sustainability Appraisal April 2016	Included in Preferred Options Sites & Boundaries
BD138b	76	Green Belt	Red	<p>biodiversity value of the site. However, the development of greenfield land, grade 4 ALC is assessed as having a negative effect, as could the site's location near to historic assets.</p> <p>The proposed delivery of circa 76 dwellings is considered to have a significant positive effect, as could the site's proximity to existing areas of employment. The site is also accessible to existing services and facilities which is likely to have a positive effect. However, the development of greenfield land, grade 4 ALC is assessed as having a negative effect, as could the site's location near to historic assets and the district ecological importance of the site.</p>	No. Green Belt Review recommends that the site is not considered for release from the Green Belt.
BD144	80	Green Belt	Red	<p>The proposed delivery of circa 80 dwellings is considered to have a significant positive effect. The site is also accessible to existing services, facilities and existing areas of employment is likely to have a positive effect, as could the site's distance away from historic assets. However, the development of greenfield land is assessed as having a negative effect, as could the site's district ecological importance of the site.</p>	No. Green Belt Review recommends that the site is not considered for release from the Green Belt.
ADD02	Around 150	Green Belt	Red	<p>The proposed delivery of around 150 dwellings is considered to have a significant positive effect, as could the site's proximity to areas of</p>	No. Green Belt Review recommends that the site is not

Site	Dwellings	Designation RAG	RAG classification	Sustainability Appraisal April 2016	Included in Preferred Options Sites & Boundaries
ADD03	Up to 300	Green Belt	Green	<p>existing employment. The site's location away from designated and historic assets is likely to have a positive effect. However, the site's inaccessibility to services and facilities is likely to have a negative effect, as could the development of greenfield, grade 4 ALC land.</p> <p>The proposed delivery of up to 300 dwellings is considered to have a significant positive effect. The site's location away from designated assets is likely to have a positive effect, as could the site's accessibility to services, facilities and areas of existing employment. However, the site's proximity to historic assets is likely to have a significant negative effect. The development of greenfield, grade 4 ALC land is considered to have a negative effect.</p>	considered for release from the Green Belt.
ADD04	up to 250	Green Belt	Green	<p>The proposed delivery of up to 250 dwellings is considered to have a significant positive effect, as could the site's proximity to areas of existing employment. However, the site's proximity to historic assets is likely to have a significant negative effect. The development of greenfield, grade 4 ALC, land is assessed as having a negative effect.</p>	<p>Yes. Development feasible from Highway Authority perspective, Green Belt Review recommends considering removal of site from Green Belt.</p> <p>Yes. Green Belt Review recommends considering removal of site from Green Belt, land available.</p>

Table 6.1

6.25 Employment & Mixed Use Allocations

6.26 In the same way as housing allocations, employment and mixed use allocations were considered at Member workshops and included on the 'Red Amber Green' (RAG) tables published as background information to the committee papers for Council Assembly held in April 2016. The table below summarises this and indicates which sites were taken forward to the Preferred Options Sites and Boundaries consultation in 2016.

Site	Size of Site & Mix of Uses	Designation RAG	RAG classification	Sustainability Appraisal April 2016	Included in Preferred Options Sites & Boundaries
BD117	6.74ha (primarily employment with possibly some residential)	Green Belt	Green	The development of new employment premises should have a significant positive effect upon the vitality and viability of the District, strengthen economic growth and support a higher level of employment within the District. However, the greenfield nature of this site and its location outside of the settlement boundary, coupled with its district ecological importance could have a negative effect.	Yes. Green Belt Review recommends considering site for release from Green Belt, part of site available (awaiting response from landowners on rest), suitable access point could be created, land well located close to existing Victoria Business Park. The eastern part of this area could be used for housing (further investigation required) as not all of the area marked on the map is needed for employment within the plan period.
BD076a	3.5ha (mixed use retail / employment)	In development boundary	Green	The development of new employment premises should have a significant positive effect upon the vitality and viability of the District, strengthen economic growth and support a higher level of employment within the District. Similarly, the site is located within settlement boundary and should have good access to services and facilities which will also have a significant positive effect. However, the site has been assessed as having a district ecological importance which will have a negative effect.	Yes. Sustainable location, suitable access, part of a larger development scheme at Wharf Road, land available, suitable site for new food store recommended in Council's Retail Study.

BD076	Employment	In development boundary	Green	<p>The proposed delivery of a town centre employment site is considered to have a significant positive effect. Similarly, the site's accessibility to services, facilities and areas of existing employment is likely to have a positive effect.</p>	<p>Yes. Sustainable location, suitable access, part of a larger development scheme at Wharf Road, land available.</p>
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Table 6.3

Open Space and Visual Open Space

6.27 All types of open space, playing pitches and areas of visual open space were combined to form an 'open space' layer which was shown on the maps in the Site Options Consultation Booklet. All open space and playing pitches were included from the Council's sports and open space database. Areas of Visual Open Space were those designated in the 1998 Local Plan. Comments were invited.

Retail Requirements

6.28 The Council's Retail Study, published in 2013 recommended an allocation to accommodate a discount foodstore to claw back some of the 45% of residents who shopped out of town for their main food shopping (qualitative need only – no quantitative need). The study identified outflow to mainstream and discount foodstores. It was advised that a discount store would provide the local population with more choice as due to closures of other stores Sainsburys was the only mainstream foodstore in the town. The study considered that this approach would be unlikely to have a detrimental impact on Sainsburys which was currently trading above average.

6.29 The study recommended that any new store was sustainably located so that linked trips to the town centre could still be achieved. It was considered that the only site option would be west of the bypass and it was acknowledged that the site would need to be accessed and accommodated alongside housing so careful planning would be required to achieve this. A standard sized store of around 1,000m² (net sales) was recommended.

Town Centre Boundaries

Biddulph Town Centre Boundary

6.30 National Planning Policy Guidance (NPPF) requires the Council to support its town centres, ensuring their vitality. One of the ways of achieving this is to adopt a 'town centres first' approach to new development proposals which are classed as town centre uses e.g. retail, cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling, theatres and museums. In particular, applicants for retail schemes outside town centres are required to demonstrate that their proposal cannot be accommodated within or closer to the town centre.

6.31 A separate map showing a draft Biddulph Town Centre Boundary containing areas predominantly occupied by main town centre uses was included in the consultation booklet. It should be emphasised that the town centre boundary is a planning policy tool only and may not constitute the whole town centre as far as residents would consider (refer to Policies TCR1, TCR2 and TCR3 of the Submission Version Local Plan for details of policy measures proposed in the defined town centre area).

6.32 The Council's Retail Study (2013) suggested an indicative town centre boundary for Biddulph for consideration by the Council.

6.33 This boundary was amended for the 2015 Site Options Consultation Document. It was refined by the regeneration team then agreed at Council Assembly in June 2015. Amendments were made in the following places:

- Sainsburys Car Park – excluded.

- Station Road – Church and open space excluded.
- Cross Street – exclusion of residential premises.
- High Street – tighter boundary around rear of properties on east side of High Street.
- South View – exclusion of properties.

6.34 The reason these amendments were considered appropriate was to allow for more flexibility on land uses in these areas. The retail industry is undergoing significant change to reflect how customers now shop and many are reducing the number of high street shops as a result of higher levels of customers shopping online. This trend is likely to continue and it is important that planning policy offers a degree of flexibility on proposals for changes of land use in more peripheral parts of the town centre where a focus on retail may no longer be realistic.

Primary & Secondary Frontages

6.35 Primary frontages are intended to include a high proportion of retail uses which may include food, drinks, clothing and household goods. Secondary frontages provide greater opportunities for a diversity of uses such as restaurants, cinemas and businesses.

6.36 Draft Primary and Secondary frontages for Biddulph were included on the town centre map and comments were invited.

Consultation Comments

6.37 The only comment on the Biddulph Town Centre Boundary resulted in a change to the plan. It stated that the proposed boundary was too big and included too much peripheral retail. It was suggested that it was amended over a smaller area to allow for more flexibility on unused edge of centre retail. It was also suggested that the Town Hall should be included in the Town Centre Boundary.

6.38 The Council agreed that the Town Centre Boundary would benefit from a number of minor adjustments to ensure that areas included are predominately occupied by main town centre uses and amended the boundary as follows:

- Exclude area on Congleton Road;
- Exclude small area on the east side of John Street; and
- Exclude area to the south of Well Street
- Included the Town Hall within the Town Centre Boundary.

6.39 This amendment was agreed at Council Assembly in April 2016.

6.40 No comments were received on the primary and secondary frontages at this stage.

Consultation Responses

6.41 There was a high level of response to the consultation from the local residents, developers/agents and other statutory bodies - 5500 responses were received. Details of the comments made and Council response can be found in the consultation statement.

6.42 The Council Assembly meeting on 13th April 2016 considered the responses to the Site Options consultation, the evidence base and approved the sites to form the basis of the Preferred Options Sites and Boundaries consultation.

Preferred Options Sites and Boundaries consultation 2016



7 Preferred Options Sites and Boundaries consultation 2016

7.1 The Preferred Options Sites and Boundaries 2016 consultation was approved by Council Assembly on 13th April 2016, the housing and employment land development requirements were approved by Council Assembly on 2nd March 2016. The consultation was carried out from 28th April to 13th June 2016. It sought views on:

- Development requirements
- Green Belt boundary
- Housing allocations
- Employment allocations
- Mixed use allocations
- Retail allocations, town centre boundaries and retail frontages
- Open space designations
- Settlement and infill boundaries
- Gypsy & traveller allocation
- Areas for potential infrastructure improvements

7.2 It did not include details of proposed policies. These were included in the Preferred Options consultation in 2017.

7.3 The content of this consultation document was informed by evidence available at the time, Government Policy, the Sustainability Appraisal and the consultation responses received during the 2015 consultation. The document was accompanied by an Initial Sustainability Appraisal and was supported by documents from the evidence base. New evidence that had been completed since the Site Options consultation relevant to the establishment of preferred sites and boundaries included the Green Belt Review 2015, the Gypsy and Travellers Needs Assessment and the Ecology Study 2015.

Residential Allocations

7.4 The SHMA had been updated in July 2015 to reflect the 2012 sub national CLG household projections and the 2011 census data and in January 2016 to take account of the 2014 mid year estimates and relevant case law relating to the derivation of housing need. The updated SHMA identified a need for between 250 - 440 homes per year across the District over the period 2012 to 2031.

7.5 The top of the range related to the level of housing growth required to support potential employment growth, the middle of the range would support the retention of existing jobs, whilst the bottom would not support job growth and would likely lead to a decline in jobs due to the decline in working age population.

7.6 On the basis of the evidence at the time the Preferred Options Sites and Boundaries consultation proposed an annual housing requirement of 320 per year, this would support job stabilisation and included an additional 10% to support affordable housing.

7.7 This level of housing growth was considered to:

- Fully meets demographic housing needs
- Help to address the affordable housing need
- Likely to help sustain a modest increase in jobs
- Be aspirational but realistic as required by the NPPF taking account of the historic average delivery rate of 195 homes per year.
- Be deliverable in terms of the supply of suitable land, the scope to release land from the Green Belt and infrastructure capacity.
- Be less likely to give rise to significant landscape impacts, including on the setting of the Peak District National Park.
- Provide a balanced range of social, economic and environmental effects in line with the Sustainability Appraisal and Council's Corporate Plan 2015-2019.

7.8 Policy SS3 of the Core Strategy detailed the spatial distribution of housing and employment development across the District. The Preferred Options Sites and Boundaries consultation carried this forward as there was no evidence to indicate this approach should be changed.

7.9 The proposed development approach was to focus development in the market towns Leek, Biddulph and Cheadle and the larger villages and allow for limited development of the other settlements to meet local needs to support sustainable communities and help bring forward regeneration opportunities.

7.10 The spatial distribution of the residential allocations was in accord with Policy SS3 of the Core Strategy. This gave Biddulph 20% of the distribution. Taking into account the completions and commitments that had occurred since the start date of the Local Plan the consultation sought to support the delivery of 4158 homes up to 2031 of which 885 (net residual requirement) were in Biddulph.

Area	Amount	Net residual requirement
Leek	30%	1016
Biddulph	20%	885
Cheadle	22%	1029
Rural Areas	28%	1228
Total	100%	4158

Table 7.1 Residual housing requirement (Preferred Options Sites & Boundaries consultation 2016)

7.11 The Core Strategy policy SS5b committed the Council to undertake a comprehensive review of the Green Belt around Biddulph to determine the potential for development sites to help to meet requirements. The Council therefore commissioned the Green Belt Review

Study 2015 of the whole District to consider the scope to release land from Green Belt by appraising against the five purposes of the Green Belt set out in the NPPF. The study concluded that the general extent of the Green Belt should be retained but identified several areas which it considered were suitable for release in exceptional circumstances through a Local Plan review. These were in Biddulph as well as other parts of the District.

7.12 The consultation therefore proposed a number of sites in the Green Belt which the Study identified as being suitable for release in exceptional circumstances. It was considered that the need to meet the development requirements of the District, together with specific site circumstances constituted exceptional circumstances.

7.13 Of the 11 residential allocations included in the consultation for Biddulph, the majority (8) were in the Green Belt. The other 3 were in the urban area, 2 relatively small sites and Core Strategy Broad Area 4 made up of 5 neighbouring sites on the west side of the bypass (BD071, BD071a, BD106, BD156 and BD055).

7.14 The consultation booklet included a table for Biddulph showing how the 885 net housing residual requirement would be met. As well as the 11 residential allocations, the provision included a large windfall site allowance (20 dwellings). This was intended to include sites potentially suitable for development but where, at that time, a separate allocation for each one was not considered necessary e.g. BD059 and the town centre mills (Yarn Mill and Minster Mill) considered to be infill sites within the urban area at the previous stage in 2015.

7.15 The table below shows the residential allocations and details which ones were carried forward to the Preferred Options 2017 consultation.

Site	Dwellings	Designation	Sustainability Appraisal Report July 2017	Included in Preferred Options consultation 2017
Biddulph				
BD016	20	In urban area	The site should deliver a quantum of housing, circa 20 dwellings which is likely to have a significant positive effect, as could the location of the site with regard to its proximity to services and facilities and areas of existing employment as well as the positive effect on the landscape. The site is located within the settlement boundary and has good accessibility to health care services and facilities. However, its proximity to heritage assets would have a negative effect.	Yes. Site to be developed as part of a wider regeneration opportunity including land to the west side of the bypass to bring forward a large strategic mixed use regeneration site which is well related to the town centre and its key services and facilities.
BD108	12	In urban area	The development of urban ALC brownfield land should have a significant positive effect, as should the preservation of the	Yes. Site to be developed as part of a wider regeneration opportunity including land to the west side of

			<p>landscape and the site's proximity to services and facilities.</p> <p>However there is scope that development of this site could have significant negative effects on historical assets. Similarly, the site's ecological value would have a negative effect.</p>	<p>the bypass to bring forward a large strategic mixed use regeneration site which is well related to the town centre and its key services and facilities.</p>
BD071, BD071a, BD106, BD156, BD055	335	In urban area	<p>The site's proximity to services, facilities and existing areas of employment and proposed delivery of circa 265 dwellings should have a significant positive effect (note that this figure was from the original estimated capacity for the site in 2016 and does not reflect the increased capacity as the evidence base evolved in 2017). However there is scope that development of this site could have negative effects due to the site's ecological importance and the development of greenfield land.</p>	<p>Yes.</p> <p>Sites to be the key part of a regeneration opportunity including land to the east side of the Biddulph Valley Way to bring forward a large strategic mixed use regeneration site which is well related to the town centre and its key services and facilities.</p>
BD062	40	Green Belt	<p>The proposed delivery of circa 40 dwellings should have a significant positive effect. The site is also accessible to existing services, facilities and areas of employment which is likely to have a positive effect. However, the site's ecological importance due to the potential for protected species to be present and its connection to the wider countryside are considered to have a significant negative effect. Similarly, the development of greenfield land, grade 4 ALC and the site's proximity to historic assets are also assessed as having a negative effect.</p>	<p>No. An alternative Green Belt site exists adjacent to Wharf Road which will assist with bringing forward a large strategic mixed use regeneration site which is well related to the town centre and its key services and facilities.</p>
BD068	70	Green Belt	<p>The proposed delivery of circa 70 dwellings is considered to have a significant positive effect, as could the site's</p>	<p>No. An alternative Green Belt site exists adjacent to Wharf Road which will assist with bringing forward a large</p>

			<p>proximity to existing areas of employment. The site is also accessible to existing services and facilities which is likely to have a positive effect. However, the site is partly located within a flood zone which is likely to have a significant negative effect. Similarly, the ecological value is considered to have a negative effect, as could the development of greenfield land, grade 4 ALC and the site's proximity to heritage assets is also assessed as having a negative effect.</p>	<p>strategic mixed use regeneration site which is well related to the town centre and its key services and facilities.</p>
BD087	25	Green Belt	<p>The proposed delivery of circa 25 dwellings is considered to have a significant positive effect, as could the site's proximity to existing areas of employment. The site is also accessible to existing services and facilities which is likely to have a positive effect. However, the site is partly located within a flood zone which is likely to have a significant negative effect. The development of greenfield land, grade 4 ALC and the site's proximity to heritage assets and an LNR is likely to have a negative effect, as could the site's ecological value.</p>	<p>No. An alternative Green Belt site exists adjacent to Wharf Road which will assist with bringing forward a large strategic mixed use regeneration site which is well related to the town centre and its key services and facilities. Also, there was a query over the viability of developing the site due to the potential cost of an access bridge over Biddulph Brook for a small site.</p>
BD063a	40	Green Belt	<p>The proposed delivery of circa 120 dwellings (NB this was reduced to 40 at this stage due to advice from the Green Belt Review) should have a significant positive effect. The site is also accessible to existing services, facilities and areas of employment which is likely to have a positive effect. However, the site's ecological value is considered to have a</p>	<p>No. An alternative Green Belt site exists adjacent to Wharf Road which will assist with bringing forward a large strategic mixed use regeneration site which is well related to the town centre and its key services and facilities.</p>

			negative effect. Similarly, the development of greenfield land, grade 3/4 ALC and the site's proximity to historic assets are also assessed as having a negative effect.	
BD069	30	Green Belt	The proposed delivery of circa 30 dwellings is considered to have a significant positive effect. The site is also accessible to existing employment areas which is likely to have a positive effect. However, the site's proximity to historic assets is assessed as having a significant negative effect. The development of greenfield land is also assessed as having a negative effect.	No. An alternative Green Belt site exists adjacent to Wharf Road which will assist with bringing forward a large strategic mixed use regeneration site which is well related to the town centre and its key services and facilities. Also, harm of development to Knypersley Hall was a key issue – any harm would need strong justification.
ADD04 - off Mill Hayes Road	150	Green Belt	The proposed delivery of circa 1,070 dwellings (NB only 150 dwellings were proposed in the plan as the site was also proposed to accommodate a school and there were highway access issues which reduced its capacity) is considered to have a significant positive effect, as could the site's proximity to areas of existing employment. However, the site's proximity to historic assets is likely to have a significant negative effect. The development of greenfield, grade 4 ALC land is assessed as having a negative effect.	No. An alternative Green Belt site exists adjacent to Wharf Road which will assist with bringing forward a large strategic mixed use regeneration site which is well related to the town centre and its key services and facilities. Also, harm of development to Knypersley Hall was a key issue – any harm would need strong justification.
ADD03 - off Akemoor Lane	60	Green Belt	The proposed delivery of circa 372 dwellings (NB only 60 dwellings were proposed in the plan as the site was also proposed to accommodate a school) is considered to have a significant positive effect. The site's location away from designated assets is likely to have a positive effect, as could	No. An alternative Green Belt site exists adjacent to Wharf Road which will assist with bringing forward a large strategic mixed use regeneration site which is well related to the town centre and its key services and facilities. Also, there was

			the site's accessibility to services, facilities and areas of existing employment. However, the site's proximity to historic assets is likely to have a significant negative effect. The development of greenfield, grade 4 ALC land is considered to have a negative effect.	uncertainty with land availability across the site as well as constraints identified from the evidence base - a combination of high landscape sensitivity across the whole of the site and heritage issues with the northern part of the site.
BD117 (mixed use including housing)	65	Green Belt	The development of new employment premises should have a significant positive effect on the vitality and viability of the District, strengthen economic growth and support a higher level of employment within the District. However, the greenfield nature of this site and its location outside of the settlement boundary, coupled with its ecological value could have a negative effect.	Yes. Site to be developed as part of a mixed use employment / residential scheme in order to address demand for employment and housing in Biddulph. It is considered that this site is ideally located with good road links opposite Victoria Business Park and bringing it forward will have a positive impact on the local economy.

Table 7.2 Residential Allocations Biddulph 2016

7.16 A number of additional residential sites were suggested during the consultation. These are detailed in examination library document ref 33.6 (in the appendices). Most of these were not considered suitable for designating as additional housing sites either due to their size, location, unavailability or development constraints. Only one of the new sites suggested at this stage was included in the Preferred Options Local Plan published in 2017 - a site known as BDNEW located on the west side of the Biddulph Valley Way adjacent to Woodside Farm.

Employment & Mixed Use Allocations

7.17 An employment land requirement of approximately 35 ha gross to support the preferred level of housing growth was included in the Preferred Sites and Boundaries Consultation Document. This level of employment growth represents an uplift from the 33.5ha recommended to support the Core Strategy housing requirement of 300 homes per year. Once completions and commitments up to 2014/15 were taken into account this left a the net requirement of 19.46ha (excluding the mixed use employment site at Blythe Vale which is considered separately).

7.18 Policy SS3 of the Core Strategy sets out the broad spatial distribution for employment and the Preferred Options Sites and Boundaries consultation carried forward this distribution.

Area	Amount
Leek	30%
Biddulph	20%
Cheadle	20%
Rural Areas	30%

Table 7.3 Core Strategy Policy SS3 - Distribution of Employment Development

7.19 For Biddulph, this amounts to approximately 3.89ha of new employment land. Potential allocations consulted on in 2016 are shown in the table below.

Site / Use	Size	Designation	Sustainability Appraisal Report July 2017	Included in Preferred Options consultation 2017
BD117 (housing / employment mix)	6.74ha	Green Belt	The development of new employment premises should have a significant positive effect on the vitality and viability of the District, strengthen economic growth and support a higher level of employment within the District. However, the greenfield nature of this site and its location outside of the settlement boundary, coupled with its ecological value could have a negative effect.	Yes. Site to be developed as part of a mixed use employment / residential scheme in order to address demand for employment and housing in Biddulph. It is considered that this site is ideally located with good road links opposite Victoria Business Park and bringing it forward will have a positive impact on the local economy.
BD076 / BD076a (employment / retail mix)	3.5ha	In urban area	BD076: The proposed delivery of a town centre employment site is considered to have a significant positive effect. Similarly, the site's accessibility to services, facilities and areas of existing employment is likely to have a positive effect. BD076a: The development of new employment premises should have a significant positive	Yes. Site to be developed as part of a wider regeneration opportunity including land to the south to bring forward a large strategic mixed use regeneration site which

			<p>effect on the vitality and viability of the District, strengthen economic growth and support a higher level</p> <p>of employment within the District. Similarly, the site is located within settlement boundary and should have good access to services and facilities which is likely to also have a significant</p> <p>positive effect. However the site has been assessed as having ecological value which is likely to have a negative effect.</p>	<p>is well related to the town centre and its key services and facilities.</p>
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Table 7.4 Employment / Mixed Use Allocations Biddulph 2016

7.20 Education

7.21 The NPPF requires the Council to consider infrastructure capacity necessary to support the proposals in the Local Plan. Based on information available at that time, particularly feedback from Staffordshire County Council, a number of areas including Biddulph were identified as being in need of school improvements to support proposals in the Local Plan. At that time it was estimated that a new first school would need to be built in Biddulph. The Local Plan Preferred Options Sites and Boundaries therefore sought to support the delivery of the identified education requirement in Biddulph through a land allocation.

7.22 At that time, it was not clear how development was to be distributed within the town which is why two potential locations for a new school were identified on the consultation map - one as part of site ADD03 and one as part of ADD04. Only one school was needed but the Council were advised to suggest two areas for consultation at this stage as the final location for the school was dependent on where in the town the bulk of the housing was located.

7.23 Retail

7.24 Following on from amendments made as a result of the 2015 consultation, the 2016 Preferred Options Sites and Boundaries consultation included a revised Biddulph Town Centre Map showing a town centre boundary and a primary and secondary frontage. At this stage, no comments on the Biddulph Town Centre boundary amendments or the primary and secondary frontages resulting in further changes were received.

7.25 There was a change made prior to the Preferred Options 2017 consultation regarding secondary frontages. It was recommended (and subsequently agreed at Council Assembly on 12th July 2017) that secondary frontages should not be included in the Local Plan going forward. The reason for this was that the vitality and viability of town centres is very dependent on the state of the economy as well as constantly changing technology and trends. A flexible approach to town centre uses in areas peripheral to the primary shopping frontage was considered to be appropriate and with this in mind alongside the suggestion in the Council’s Retail Study that secondary frontages are not required they were removed from the plan.

The Council's retail consultants pointed out that given recently published new guidance supporting the temporary re-use of existing units within town centre locations to non-retailing activities (i.e. residential or wider commercial uses) secondary frontages were not required.

Open space and Visual Open Space

7.26 Areas of public open space and visual open space were shown separately on the maps in the Preferred Options Sites and Boundaries Consultation Booklet. All open space and playing pitches were included from the Council's sports and open space database. Areas of Visual Open Space were those designated in the 1998 Local Plan. Comments were invited.

Consultation Responses

7.27 There was a very high level of response to the consultation from the local residents, developers/agents and other statutory bodies. 8600 responses were received. Details of the comments made and Council response can be found in the consultation statement.

Preferred Options Consultation 2017



8 Preferred Options Consultation 2017

8.1 The Preferred Options consultation 2017 was approved by Council Assembly on 12th July 2017, the housing and employment land requirements were approved by Council Assembly on 8th March 2017.

8.2 It was a full draft of the Local Plan, seeking views on proposed policies, sites and boundaries. It comprised of the following:

- A portrait of Staffordshire Moorlands - a description of the District
- The Challenges - a summary of the key challenges facing the District
- The Vision - detailing what the Staffordshire Moorlands will be like in 2031
- Aims and Objectives - stating what the Local Plan is proposing to achieve
- A Spatial Strategy and Strategic Policies - setting out the over-arching strategy and policies for the District
- Development Management Policies - setting out specific measures to manage development
- Strategic Development Site Policies - specific policy to guide the development of strategic sites
- Implementation and Monitoring - a framework for how the plan will be implemented and monitored
- Maps - for Leek, Biddulph, Cheadle and the rural areas which identify proposed sites and boundaries

8.3 The consultation took place from the 31st July to 22nd September 2017.

8.4 It was accompanied by a Sustainability Appraisal and a Habitats Regulations Assessment of the Preferred Options sites.

8.5 The content of the plan was informed by evidence available at the time, Government Policy, the Sustainability Appraisal and the consultation responses received during the 2016 consultation. A number of new evidence base documents were completed since the preferred sites and boundaries consultation relevant to the establishment of Preferred Options Sites. They included the:

- SHMA update 2017,
- Employment Land Study Update 2017,
- Extended Phase 1 Habitat Surveys and Local Wildlife Site (LWS) Assessments 2017,
- Cheadle Transport Study Phase 2 Assessment 2017,
- Green Belt Review Updates 2016 and 2017,

- Green Infrastructure Strategy 2018,
- Playing Pitch Assessment, Playing Pitch Strategy and Action Plan, Open Space Study - Update Report, Open Space Standards Paper 2017
- Infrastructure Delivery Plan - Baseline Report 2016, and
- Landscape, Local Green Space and Heritage Impact Study 2016.

Residential Allocations

8.6 The SHMA was updated in 2017 to take account of the 2014 based Sub national population projections and the 2014 based household projections. It concluded that the housing need of the District was within the range of 235-330.

8.7 The Preferred Options Local Plan proposed a figure of 320 dwellings per year to meet the objectively assessed needs of the area. It was considered that the proposed provision would:

- fully meet demographic housing needs
- help support an increase in jobs
- help address affordable housing needs
- the figure was aspirational but realistic in line with the NPPF given the historic average delivery rate of 320 per year.
- was deliverable in terms of the supply of suitable land and not considered to cause significant landscape impacts
- provide a balanced range of social, economic and environmental effects in line with the Sustainability Appraisal

8.8 The spatial distribution of the residential allocations was broadly in accord with Policy SS3 of the Core Strategy. It was modified slightly to reflect new evidence, feedback and emerging Government policy and regulation. Key changes included;

- Amendments to the Preferred Options sites
- A new approach to support limited infill in the Rural Areas (Policies SS8 Larger Villages Areas Strategy, SS9 Smaller Villages Areas Strategy, and H1 New Housing Development allowed for limited development in defined circumstances, and where appropriate in accordance with national Green Belt policy within or adjoining the larger village boundary or in smaller villages).
- An adjustment to the Spatial Strategy to decrease the Rural Areas housing distribution by 3% to 25% and a corresponding increase in Cheadle's distributions 3% to 25%.

8.9 The distribution of housing for Biddulph remained unchanged from the Core Strategy - at 20%. This reflected the supply of suitable sites and Green Belt constraints.

8.10 Taking into account the completions and commitments that had occurred since the start date of the Local Plan 2012 the consultation sought to support the delivery of 3859 homes up to 2031 of which 885 were in Biddulph.

Area	Amount	Net Requirement
Leek	30%	1015
Biddulph	20%	885
Cheadle	25%	1166
Rural Areas	25%	793
Total	100%	3859

Table 8.1 Spatial Distribution of Housing (Preferred Options consultation 2017)

8.11 In Biddulph the consultation proposed a total of five residential allocations (two of these were mixed use). Of the five, two sites were in the Green Belt and three within the development boundary. The reduction in the number of sites reflected new heritage evidence which became available and a new site suggestion made in response to the 2016 consultation which, after investigation, was considered more suitable for inclusion in the Local Plan than the previous Green Belt housing sites.

8.12 The Preferred Options Local Plan sought to minimise the release of Green Belt land in line with the NPPF and recently published Housing White Paper Fixing our broken housing market (February 2017).

8.13 The NPPF specifies that the Green Belt is of great importance in order to prevent urban sprawl by keeping land permanently open; the essential characteristics of the Green Belts are their openness and permanence. The NPPF is clear that "once established Green Belt boundaries should only be altered in exceptional circumstances through the preparation or review of a Local Plan" (paragraph 83) However it does not specify what exceptional circumstances are.

8.14 The Government sought to clarify this in the Housing White Paper which reiterated the Government's commitment to maintaining the existing strong protections for the Green Belt and clarified that Green Belt boundaries should only be amended in exceptional circumstances when it can be demonstrated that all other reasonable options for meeting identified housing requirements have been fully examined. This includes:

- making effective use of suitable brownfield sites and estate regeneration
- considering the potential of land which is currently underused including surplus public sector land where appropriate
- optimising density
- exploring whether other authorities can help meet the housing requirement
- Impact of removing land from the Green Belt should be offset

8.15 The new site suggested during the 2016 consultation and included in the Preferred Options Local Plan 2017 was labelled 'BDNEW' and located on the west side of the Biddulph Valley Way adjacent to Woodside Farm. When it was suggested, initial investigations took place to determine its suitability for inclusion in the plan. The Council's Green Belt Reviewers

looked at the site and advised the Council that it could consider removing it from the Green Belt (subject to exceptional circumstances being demonstrated). County Highways advised that it was potentially suitable. The landowners confirmed its availability. The principle of crossing the Biddulph Valley Way with a vehicular access was deemed acceptable by the County Council. Potential utilities constraints were investigated and none came to light which would prevent the creation of an access point across the Biddulph Valley Way.

8.16 In the Preferred Options Local Plan a reduction in Green Belt development in Biddulph was proposed (approximately, 255 homes on land currently designated as Green Belt - part of Wharf Road and Tunstall Road sites - compared to 480 in the 2016 consultation). This has been achieved by amendments to the proposed allocations with consideration given to their respective planning merits.

8.17 The site was considered to have site specific exceptional circumstances to justify its release from the Green Belt, namely - the site would form part of a wider regeneration opportunity including land to the west side of the bypass (identified for development in the Council's Core Strategy) to bring forward a large strategic mixed use regeneration site which is well related to the town centre and its key services and facilities. Considering these factors collectively, it is considered that there are exceptional circumstances to release these sites from the Green Belt.

Site	Designation	Included in Submission Version Local Plan
BIDDULPH		
Wharf Road Strategic Development Area (BD055, BD071, BD071A, BD106, BD156, BD076, BD076A, BD108, BD016, BD104)	In development boundary	Yes
BDNEW	Green Belt	Yes
The Mills - BD101	In development boundary	Yes
The Mills - BD102	In development boundary	Yes
Tunstall Road Strategic Development Area (BD117)	Green Belt	Yes

Table 8.2 Biddulph Sites Included in the Preferred Options Local Plan 2017

8.18 Employment / Mixed Use

8.19 The provision of employment land is based on the 2014 Employment Land Study and update report published in 2017. The 2017 report identified a need for 13-27 hectares of employment land across the District to 2031. In order to provide a balanced level of employment and housing, an employment land requirement of 27 hectares is proposed District wide which equates to around 5.4ha for Biddulph.

8.20 This is proposed to be delivered over 2 sites at Tunstall Road (opposite the Victoria Business Park) and Wharf Road.

8.21 Tunstall Road is the location for the bulk of the towns residual employment land requirement (to 2031), catering for more 'general' or heavy industrial uses given its position along the A527 that links Stoke with Cheshire and its proximity to existing industrial areas at Victoria Business Park, Forge Way etc.

8.22 The amount of employment and retail ('commercial') provision at Wharf Road was reduced from 3.5ha in 2016 to 1.5ha in the Preferred Options (and Submission Version) Plan. This is because in 2016 the commercial figures given in the consultation document allowed for a surplus of employment land. When preparing the 2017 Preferred Options Local Plan the commercial hectareage figures were reduced at Wharf Road and Tunstall Road. In the case of Wharf Road it was considered that using this non-Green Belt land for housing would be more appropriate in order to minimise Green Belt development.

8.23 Education

8.24 Following consultation with the County Council Education Authority, they informed the Council that the levels of housing proposed for Biddulph would not create the need for a new first school in the town so there was no longer the need for an allocation to be included in the plan.

8.25 Retail

8.26 No changes to the town centre boundary were made from the previous published 2016 version. No comments leading to the need for further changes were received from the consultation.

8.27 As explained in the previous chapter, secondary frontages were excluded from the plan as a result of evidence demonstrating they were surplus to requirements.

8.28 Previous versions of the plan identified a precise location for the new foodstore in Biddulph - off the bypass. This version of the plan lists it as a use within the Wharf Road Strategic Development Area and states that a masterplan looking at the constraints and other land uses in more detail will determine where it will be placed on the site.

Local Green Space and Open Space

8.29 The Landscape and Local Green Space and Heritage Impact Study (2016) reviewed the 'Visual Open Space' designation used in the 1998 Local Plan and recommends that in order to be NPPF compliant, a new 'Local Green Space' (LGS) designation would be appropriate. Each of the Visual Open Space sites have been re-assessed using the criteria for LGS and included as an allocation in the Preferred Options Local Plan. All sites are included on the policies maps and a full list included in the Appendix.

8.30 Sports facilities and other open spaces are identified on the Preferred Options policies maps as 'open space'. Details regarding open space provision are also included within the specific Strategic Development Site Policies. It referenced updated work being undertaken on open space and sports facilities which would feed into the Submission Version Local Plan.

Consultation Responses

8.31 The level of response to this consultation from the local residents, developers/agents and other statutory bodies was significant with over 2600 responses received. Details of the comments made and Council response can be found in the consultation statement.

The Allocated Sites



9 The Allocated Sites

The Allocated Sites

Local Plan Allocations

Residential Sites

9.1 Site Proformas are included for the following residential sites:

BD101

Biddulph

BD101 Yarn Mill

Local Plan Process

- Site suggestion from the SHLAA
- Included in the options consultation July 2015
- Not included in Preferred Sites & Boundaries consultation April 2016
- Included in Preferred Options Local Plan July 2017
- Included in Submission Version Local Plan (February 2018)

Current Position

Site taken forward into Submission Version Local Plan:

- Brownfield site within the built up area boundary.
- Opportunity to intensify use in this town centre location.
- Owner interested in redevelopment of site.
- Support for redevelopment of site from Biddulph Neighbourhood Plan Working Group.

Key Issues

- Brownfield site within the built up area boundary.
- Located in the town centre.
- Owner interested in redevelopment of site.
- Bat survey required before any development takes place.
- Site suitable for development in heritage terms and is of low landscape sensitivity.
- In deep surface water floodplain and reports of local SW flooding. FRA needed.

Site Information

Greenfield/ brownfield	Built up area boundary/ countryside	Est. housing capacity	Area (ha)	Ownership status	Site details
Brownfield	Within settlement boundary, close to town centre	24 (at 150 dph - gross)	0.16 (gross)	Owner willing to develop	<ul style="list-style-type: none"> • Last used for employment • Mill building with various extensions unlikely to be suitable for residential conversion – new build more likely.

Studies

Local Plan and Site Allocations Viability Study (May 2018)

The results of the viability testing for the Biddulph Mill sites (DSB2) show that the development results in a small loss of -£14 per sq.m assuming a development of market housing. With 10% affordable provision the loss increases to -£69 per sq.m.

The level of deficit at £14 per sq.m based on a scheme of market housing is equivalent to approximately 0.6% of GDV. The appraisal includes a contingency of 5% of cost and a developer's profit of 20% of GDV, hence the result suggests that the level of loss is very marginal and the development is very close to being viable.

Biddulph

BD101 Yarn Mill

Only a small reduction in costs or the developer's expectation of profit would result in a viable development.

The study states that this is previously developed site and is also likely to benefit from vacant buildings credit hence part or all of the requirement for affordable housing may be offset by the floorspace of the existing buildings.

The study concludes that the development is however not presently sufficiently viable to support education contributions at the required level nor adaptations to provide M4 (2) compliance to 20% of the dwellings and the Council may therefore need to be flexible in its approach to developer contributions if the site is to come forward for development.

Local Plan Housing Trajectory

The site is in the housing trajectory (included within 'Biddulph – the Mills') to come forward in the latter part of the plan period (2028-2031).

Biddulph Neighbourhood Plan

The Biddulph Neighbourhood Plan is at an advanced stage of production and the Neighbourhood Plan Working Group has identified the 'Mill Triangle' which includes Yarn Mill and Minster Mill as an area they would like to see high density residential development in a town centre masterplan they have produced.

Extended Phase 1 Habitat Survey 2015 (FID 19)

The site is deemed to have district overall ecological importance as the buildings could support roosting bats.

The following surveys/actions are therefore recommended prior to any potential development works being carried out:

- A bat survey regime to ascertain whether bats roost in the buildings
- Vegetation removal at the appropriate time of year

Local Wildlife Assessment (ECUS, 2016)

No Local Wildlife Survey necessary as the site is predominantly hard standing.

Landscape, Local Green Space & Heritage Impact Study (August 2016)

Landscape Impact

Existing mill located in the centre of the settlement east of the A527, enclosed by Stringer Street to the north-east. Re-development of the site could improve local townscape character. Development to south-west (in existing parking area) could be sympathetic to adjacent cottages.

Site is of low landscape sensitivity.

Biddulph

BD101 Yarn Mill

Heritage Impact

There are no designated heritage assets within the 400m buffer. Development would be highly unlikely to adversely affect the HLC zone BBHECZ 1 (Historic Environment Character Assessment).

Site suitable for development in heritage terms.

Sustainability Appraisal

Sustainability Appraisal Submission Version June 2018

The development of brownfield land indicated on the predictive map of Best and Most Versatile agricultural land as urban / industrial should have a significant positive effect, as should the preservation of the landscape and the site's proximity to existing areas of employment and services and facilities and the delivery of circa 24 dwellings. The site is located within the settlement boundary, and away from historical assets. However, the site's ecological value could have a negative effect.

This site was not taken forward as a preferred option for consultation in April 2016. The site was suggested in representations made to the public consultation held in April 2016 and proposed for inclusion in the July 2017 preferred option Local Plan. Ecological assessment is required.

Initial HRA Screening

No Likely Significant Effects (LSEs) have been identified in relation to sites in Biddulph.

Minerals

No implications.

Options Consultation July 2015

Statutory bodies/stakeholders:

SCC Highways - Acceptable subject to detailed design and provision of adequate parking. Parking will be particularly important.

Developer/Agent/Owner – Landowner intentions unknown (landowner subsequently clarified they were willing to release land for development).

Public response

3 comments – all support.

Issues raised:

- Government Policy - Site is not in the Green Belt

Council Comment –

Comments noted.

Preferred Options Consultation April 2016

Biddulph

BD101 Yarn Mill

Not included in the consultation at this stage. Assumed it would come forward as a windfall but not specifically identified.

Some comments were made in relation to this site in response to the Preferred Options Consultation including objections relating to the non-inclusion of the site.

Environment Agency: BD101 appears to be brownfield. Although it is unlikely that the issue of Brownfield Land will make any of the allocations undevelopable due to cost/constraint, sites within the Source Protection Zones and flagged up, will be subject to certain restrictions.

Biddulph Neighbourhood Plan Working Group: Brownfield Site part of the proposed mill triangle, recommended for inclusion.

Preferred Options Local Plan July 2017

Statutory bodies/stakeholders:

SCC Highways - former mills in a town centre location. Acceptable subject to design. For garages to be counted towards parking provision they must have minimum internal dimensions of 3m x 6m. A Transport Assessment/Statement is likely to be required; discussion with the Highways Authority at pre-application stage is suggested.

Developer/Agent/Owner – no response to consultation, but availability confirmed in September 2016.

Public Response:

262 comments – 254 support, 6 object and 2 general.

Main Issues Raised:

Support:

- Good use of an eyesore; development would improve the area greatly.
- Will provide the necessary footfall in the town centre, supporting local trade.
- Use of brownfield land is supported.
- New houses will be within walking distance of amenities, reducing pollution and helping to regenerate the town.
- High density development in this area will safeguard other areas of Green Belt from development.
- It was felt that development of brownfield sites is more sensible than building on Green Belt land, and that development of this type should be encouraged.
- Will bring much needed affordable housing to the area.
- Proposed site is within close proximity to the bypass.
- Removal of the mills in Biddulph is welcomed.
- A number of respondents voted in support of this allocation without giving a specific reason.

Objection:

- The sites have a combined area of approximately 0.38 hectares. In order to deliver a total of 57 dwellings this would require the site to be developed at a

Biddulph

BD101 Yarn Mill

density of approximately 150 dwellings per hectare. This is a very high density, compared to the remainder of the town.

- No other specific reasons were given by those who objected to this allocation.

Council Response:

Support noted.

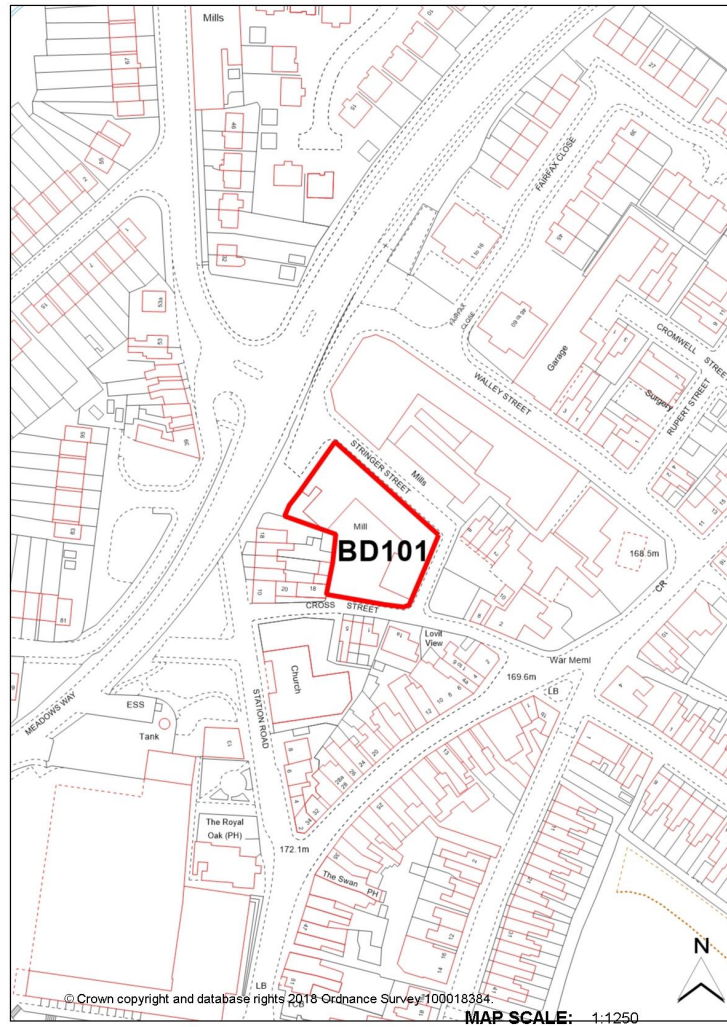
The redevelopment of Yarn Mill and Minster Mill provides an opportunity to create high density residential development on these underused sites in the town centre. This is likely to take the form of new build apartments and it is considered that the relatively high density proposed is appropriate in this location.

Local Plan Publication (Submission Version February 2018)

Refer to Staffordshire Moorlands Local Plan (Submission Version) Consultation Analysis Report May 2018.

Biddulph

BD101 Yarn Mill



Picture 9.1

BD102

Biddulph

BD102 Minster Mill

Local Plan Process

- Site suggestion from the SHLAA
- Included in the options consultation July 2015
- Not included in Preferred Sites and Boundaries Consultation April 2016
- Included in Preferred Options Local Plan July 2017
- Included in Submission Version Local Plan (February 2018)

Current Position

Site taken forward into Submission Version Local Plan:

- Brownfield site within the built up area boundary.
- Opportunity to intensify use in this town centre location.
- Owner interested in redevelopment of site.
- Support for redevelopment of site from Biddulph Neighbourhood Plan Working Group.

Key Issues

- Brownfield site within the built up area boundary.
- Located in the town centre.
- Owner interested in redevelopment of site.
- Bat survey required before any development takes place.
- Site is of low landscape sensitivity and suitable for development in heritage terms.
- Surface water floodplain (Deep) and reports of SW flooding on Walley Street. FRA needed.

Site Information

Greenfield/ brownfield	Built up area boundary/ countryside	Est. housing capacity	Area (ha)	Ownership status	Site details
Brownfield	Within settlement boundary, close to town centre	33 (at 150 dph - gross)	0.22 (gross)*	Owner willing to develop	<ul style="list-style-type: none"> • Used partly for employment • Mill building with various extensions unlikely to be suitable for residential conversion – new build more likely

*Site is in 2 ownerships – one owner does not want to redevelop for residential and their land is excluded from site boundary and calculations.

Studies

Local Plan and Site Allocations Viability Study (May 2018)

The results of the viability testing for the Biddulph Mill sites (DSB2) show that the development results in a small loss of -£14 per sq.m assuming a development of market housing. With 10% affordable provision the loss increases to -£69 per sq.m.

The level of deficit at £14 per sq.m based on a scheme of market housing is equivalent to approximately 0.6% of GDV. The appraisal includes a contingency of

Biddulph

BD102 Minster Mill

5% of cost and a developer's profit of 20% of GDV, hence the result suggests that the level of loss is very marginal and the development is very close to being viable. Only a small reduction in costs or the developer's expectation of profit would result in a viable development.

The study states that this is previously developed site and is also likely to benefit from vacant buildings credit hence part or all of the requirement for affordable housing may be offset by the floorspace of the existing buildings.

The study concludes that the development is however not presently sufficiently viable to support education contributions at the required level nor adaptations to provide M4 (2) compliance to 20% of the dwellings and the Council may therefore need to be flexible in its approach to developer contributions if the site is to come forward for development.

Local Plan Housing Trajectory

The site is in the housing trajectory (included within 'Biddulph – the mills') to come forward in the latter part of the plan period (2028-2031).

Biddulph Neighbourhood Plan

The Biddulph Neighbourhood Plan is at an advanced stage of production and the Neighbourhood Plan Working Group has identified the 'Mill Triangle' which includes Yarn Mill and Minster Mill as an area they would like to see high density residential development in a town centre masterplan they have produced.

Extended Phase 1 Habitat Survey 2015 (FID 20)

The site has low ecological importance overall but the presence of buildings with potential to support roosting bats warrants the site being attributed district ecological importance.

The following surveys/ actions are therefore recommended prior to any potential development works being carried out:

- A bat survey regime to ascertain whether bats roost in the 3 buildings
- Vegetation removal at an appropriate time of year

Local Wildlife Assessment (ECUS, 2016)

No Local Wildlife Survey necessary as the site is predominantly hard standing.

Landscape, Local Green Space & Heritage Impact Study (August 2016)

Landscape Impact

Existing mills located in the centre of the settlement east of the A527, south of Walley Street and north of Stringer Street. Re-development of this site could improve local townscape character.

Site is of low landscape sensitivity.

Heritage Impact

Biddulph

BD102 Minster Mill

There are no designated heritage assets within the 400m buffer. Development would be highly unlikely to adversely affect the HLC zone BBHECZ 1 (Historic Environment Character Assessment 2010).

Site suitable for development in heritage terms.

Sustainability Appraisal

Sustainability Appraisal Submission Version June 2018

The development of urban ALC brownfield land should have a significant positive effect, as should the preservation of the landscape and the site's proximity to existing areas of employment and services and facilities and the delivery of circa 42 dwellings. The site is located within the settlement boundary, and away from historical assets. However, the site's ecological importance would have a negative effect.

This site was not taken forward as a preferred option for consultation in April 2016. The site was suggested in representations made to the public consultation held in April 2016 and proposed for inclusion in the July 2017 preferred option Local Plan. Ecological assessment is required.

Initial HRA Screening

No Likely Significant Effects (LSEs) have been identified in relation to sites in Biddulph.

Minerals

No implications.

Options Consultation July 2015

Statutory bodies/stakeholders:

SCC Highways - Acceptable subject to detailed design and provision of adequate parking. Parking will be particularly important.

Developer/Agent/Owner - Land available.

Public response

3 comments – all support.

Issues raised:

- Government Policy - Site is not in the Green Belt

Council Comment – Comments noted

Preferred Options Consultation April 2016

Not included in the consultation at this stage. Assumed it would come forward as a windfall but not specifically identified.

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Some public comments were made in relation to this site in response to the Preferred Options Consultation including objections relating to the non-inclusion of the site.

Environment Agency: BD102 appears to be brownfield. Although it is unlikely that the issue of Brownfield Land will make any of the allocations undevelopable due to cost/constraint, sites within the Source Protection Zones and flagged up, will be subject to certain restrictions.

Biddulph Neighbourhood Plan Working Group: BD102 - Brownfield site part of the proposed mill triangle, recommended for inclusion.

Preferred Options Local Plan July 2017

Statutory bodies/stakeholders:

SCC Highways - former mills in a town centre location. Acceptable subject to design. For garages to be counted towards parking provision they must have minimum internal dimensions of 3m x 6m. A Transport Assessment/Statement is likely to be required; discussion with the Highways Authority at pre-application stage is suggested.

Developer/Agent/Owner – no response to consultation, but availability confirmed in April 2017.

Public Response:

262 comments – 254 support, 6 object and 2 general.

Main Issues Raised:

Support:

- Good use of an eyesore; development would improve the area greatly.
- Will provide the necessary footfall in the town centre, supporting local trade.
- Use of brownfield land is supported.
- It was felt that development of brownfield sites is more sensible than building on Green Belt land, and that development of this type should be encouraged.
- New houses will be within walking distance of amenities, reducing pollution helping to regenerate the town.
- High density development in this area will safeguard other areas of Green Belt from development.
- Will bring much needed affordable housing to the area.
- Proposed site is within close proximity to the bypass.
- Removal of the mills in Biddulph is welcomed.
- A number of respondents voted in support of this allocation without giving a specific reason.

Objection:

- The sites have a combined area of approximately 0.38 hectares. In order to deliver a total of 57 dwellings this would require the site to be developed at a

Biddulph

BD102 Minster Mill

density of approximately 150 dwellings per hectare. This is a very high density compared to the remainder of the town.

- No other specific reasons were given by those who objected to this allocation.

Council Response:

Support noted.

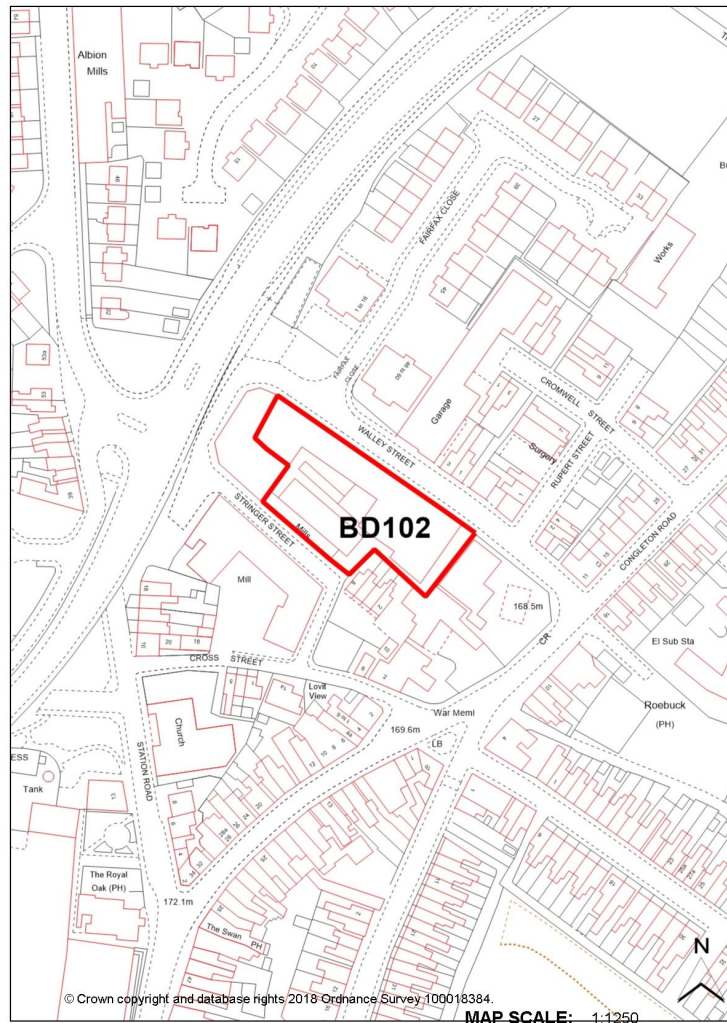
The redevelopment of Yarn Mill and Minster Mill provides an opportunity to create high density residential development on these underused sites in the town centre. This is likely to take the form of new build apartments and it is considered that the relatively high density proposed is appropriate in this location.

Local Plan Publication (Submission Version February 2018)

Refer to Staffordshire Moorlands Local Plan (Submission Version) Consultation Analysis Report May 2018.

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Picture 9.2

Mixed Use Sites

9.2 Site Proformas are included for the following mixed use sites:

Wharf Road Strategic Development Area

Wharf Road

Biddulph

Wharf Road - BD055, BD071, BD071a, BD106, BD156

Local Plan Process

- Site suggestion from the SHLAA
- Broad Area 4 in the Council's Adopted Core Strategy (March 2014)
- Included in the Options consultation July 2015
- Included in the Preferred Sites and Boundaries consultation April 2016
- Included in the Preferred Options Local Plan July 2017 as part of 'Wharf Road Strategic Development Area'.
- Included in Submission Version Local Plan (February 2018) as part of 'Wharf Road Strategic Development Area'.

Current Position

Sites taken forward into Submission Version Local Plan due to:

- The principle of development in this area is set out in the adopted Core Strategy;
- Land is outside the Green Belt;
- Sites to be the key part of a regeneration opportunity including land to the east side of the Biddulph Valley Way to bring forward a large strategic mixed use regeneration site which is well related to the town centre and its key services and facilities;

Key Issues

- Propose mixed use site (BD071, BD071A, BD156, BD106, BD108, BD076, BD076A, BD055, BD016, BD104, new site west of BVW east of Woodside Farm) incorporating:

Retail (store and car park)	0.5ha
Employment	1ha
Retention of playing fields	1.5ha
Housing - site size, number of dwellings, density	12.3ha

 (355 houses at 28.86dph gross) (23.4ha in total including all sites - gross) (refer to separate pro-formas)
- Recommended for retention as VOS in Landscape & Settlement Character Appraisal 2008 but included in the adopted Core Strategy (March 2014) for development so VOS designation no longer applies.
- Large site.
- Low and medium landscape sensitivity.
- Suitable for development in heritage terms.
- Highways – acceptable in principle. Transport Assessment required.
- Ecological interest on parts of site so further survey work required in advance of any development (see below).
- BD055 (the former Meadows School) had planning consent for 70 extra care units (subject to a s.106 agreement). This permission is not likely to be implemented. Therefore, included this site in the allocation for the wider area.
- The area has a mining legacy – including the presence of 14 mineshafts (see attached map).
- A public sewer which cannot be built over runs through the southern part of the site.

Biddulph

Wharf Road - BD055, BD071, BD071a, BD106, BD156

Site Information

Greenfield/ brownfield	Built up area boundary/ countryside	Est. housing capacity	Density	Area (ha)	Ownership status	Site details
Part greenfield & brownfield	Within the settlement boundary	355	28.86 (gross)	12.3 (gross)	Land available	<ul style="list-style-type: none"> • Contains former school now derelict and fields • Sustainable location • TPO trees on site • Watercourse through site • Ecological interest • Mineshafts present • Public sewer runs through southern part of site.

Studies

Local Plan and Site Allocations Viability Study (May 2018)

The results of the viability testing for Wharf Road (DSB1) shows that the development of this site could support 20% affordable housing provision with surplus of £50 per sq.m. This level of surplus would also be sufficient to support the cost of education contributions and requirements to achieve M4 (2). At 33% affordable provision Wharf Road generates a zero surplus. These results indicate that this development would not be sufficiently financially viable to support 33% affordable housing together with contributions to education and requirements for M4 (2).

Local Plan Housing Trajectory

The site is in the housing trajectory (included within DSB1) to begin within five years and complete by the end of the plan period (2020/21 - 2031).

Accelerated Housing Delivery Programme

The Council is taking a pro-active approach to delivery of housing in the District through its accelerated housing delivery programme (agreed at Cabinet on 24th April 2018).

Masterplanning work is being undertaken on key sites including the Wharf Road Strategic Development Area (as stated in Policy DSB1) with the aim of bringing together landowner aspirations and assessing site constraints to produce options for site layouts, valuations and delivery plans in order to help bring the sites to fruition.

Extended Phase 1 Habitat Survey 2015

FID17 (covering BD071 and BD071a)

Biddulph

Wharf Road - BD055, BD071, BD071a, BD106, BD156

The site itself has 2 trees and buildings with bat potential, species rich hedgerows, dense willow scrub and tall ruderal vegetation which are connected to a series of other hedgerows and habitats, which forms an important potentially biodiverse mosaic and warrants the site being considered to have regionally important value.

The following surveys/ actions are therefore recommended prior to any potential development works being carried out:

- A bat survey regime to ascertain whether bats roost in the trees and buildings
- Reptile survey
- Hedgerow survey
- Vegetation removal at the appropriate time of year

FID117 (covering BD055)

The site is set within a fairly urban environment with some connectivity to variable habitats within the wider countryside. The sum of habitats and their connectivity to more biodiverse habitats as well as the presence of buildings with potential to support roosting bats suggests that the site has district ecological importance. The following surveys/ actions are therefore recommended prior to any potential development works being carried out:

- Although an adequate survey has been carried out through binoculars circumventing the perimeter, as the site was not fully walked it is recommended that the site is fully resurveyed
- A bat survey regime to ascertain whether bats roost in the buildings
- Reptile survey
- Vegetation removal at the appropriate time of year

FID118 (covering BD106 and BD156)

The site itself has 9 trees and 1 building with bat roosting potential, species poor hedgerows, and tall ruderal vegetation which are well connected to a series of species rich hedgerows and habitats contained within FID17, 119 and 117. Therefore the site is deemed as having at least district ecological importance.

The following surveys/ actions are therefore recommended prior to any potential development works being carried out:

- A bat survey regime to ascertain whether bats roost in the trees and building
- Reptile survey
- Vegetation removal at the appropriate time of year

Local Wildlife Assessment (ECUS, 2016)

BD055 - The site habitats are considered to be of nature conservation value at site level only and are not eligible for possible SBI/ BAS status. However, the building on site has the potential to support bats and as such, requires further assessment. The site was also noted as potentially supporting reptiles.

The following surveys/ actions are therefore recommended in order to establish SBI/ BAS status:

- Assessment of the building for its potential to support roosting bats.
- Reptile survey required

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Wharf Road - BD055, BD071, BD071a, BD106, BD156

BD071/BD071a - The broadleaf woodland may be of ecological value and may allow for the site to gain SBI/BAS status once the vegetation has been fully recorded. Furthermore, the site offers potential to support bats, reptiles and amphibians. The following surveys/ actions are therefore recommended in order to establish SBI/BAS status:

- Hedgerow survey following the HEGS methodology.
- Detailed vegetation survey to determine the status of the habitat mosaic.
- The buildings and trees which have the potential to support roosting bats needs to be further assessed.
- Reptile survey required.

BD106/BD156 - The site habitats are considered to be of nature conservation value at site level only and are not eligible for possible SBI/ BAS status. However, the building and some trees on site has the potential to support bats and as such, requires further assessment. The site was also noted as potentially supporting reptiles.

The following surveys/ actions are therefore recommended in order to establish SBI/BAS status:

- Further assessment of the trees and building for their potential to support roosting bats. Bat survey possibly required.
- Reptile survey required.

Landscape, Local Green Space & Heritage Impact Study (August 2016)

Landscape Results

BD071 / BD071a

The largest of the sites enclosed by the dismantled railway and the A527. The site comprises Knypersley View Farm and the fields surrounding it, enclosed by the dismantled railway to the west and Colliers Way to the east. The site extends south, adjacent to the railway line, to Newpool Road where the access for the farm is located. The topography within the site is undulating, and so visual prominence of the site varies. The southern extent of the site is generally screened by surrounding vegetation. Visual prominence is higher in the north of the site, where the land rises up to a ridge (as within BD076), however this visibility is generally when viewed from within the settlement. Long distance views towards the site from the west are generally screened by intervening topography within the wider countryside. Development within the site would be located within the existing settlement form, as it is enclosed by the dismantled railway that forms a strong, vegetated edge to the settlement. If the site were to be developed additional planting on the railway line and on the ridge may need to be considered in order to reduce the visual prominence of the site. Phased development could be undertaken, allowing time for this planting to mature. **Site is of medium landscape sensitivity.** Site-specific landscape mitigation measures could include additional advanced planting on the ridge and western boundary.

BD055

Within the southern part of the land enclosed by the dismantled railway and the A527. Site comprises previously developed land (formerly a school, now demolished) immediately west of the junction of St John's Road and Tunstall Road. Re-development of the site could improve local landscape character. Development of the site (in combination with the adjacent sites) could create a stronger edge to the settlement. **Site is of low landscape sensitivity.**

Biddulph

Wharf Road - BD055, BD071, BD071a, BD106, BD156

BD106/BD156

Within the south of the land enclosed by the dismantled railway and the A527. Site comprises an existing property (Levens), gardens and adjacent fields within the south-west of the settlement. Site also includes the existing access track, extending east from the property to Tunstall Road. The site is set back from the road and is well screened by intervening vegetation and existing development. Development within the site would not be visually prominent, and (in combination with development of the adjacent sites) could create a stronger settlement edge. **Site is of low landscape sensitivity.**

Heritage Results

BD071/BD071a

There are seven Grade II Listed Buildings within the 400m buffer. Due to topography and surrounding vegetation, development would be unlikely to cause high adverse effects to the settings of the assets. Mitigation may include screening in the south-eastern part of the site. Development in the site would change a large element of the HLC zone BBHECZ 3 (Historic Environment Character Assessment 2010). However, with sensitive design, this could be mitigated. **Site suitable for development in heritage terms** subject to appropriate masterplanning.

BD055

There are seven Grade II Listed Buildings within the 400m buffer. Development would be unlikely to cause high adverse effects to the settings of the assets, however, mitigation should include screening along the southern edge of the site to reduce effects. Development would not adversely affect the HLC zone BBHECZ 3 (Historic Environment Character Assessment 2010). **Site suitable for development in heritage terms** subject to appropriate masterplanning.

BD106/BD156

There are seven Grade II Listed Buildings within the 400m buffer. Development would be unlikely to cause high adverse effects to the settings of the assets. To reduce effects, mitigation should include setting development back from the assets by keeping development to the west and north of the site as well as employing screening along the eastern edges of the site. Development would not adversely affect the HLC zone BBHECZ 3 (Historic Environment Character Assessment 2010). **Site suitable for development in heritage terms** subject to appropriate masterplanning.

Sustainability Appraisal

Sustainability Appraisal Submission Version June 2018

BD055

The site should deliver a quantum of housing, circa 20 dwellings which is likely to have a significant positive effect, as could the development of brownfield land indicated on the predictive map of Best and Most Versatile agricultural land as urban / industrial and proximity to services and facilities. However, the site's proximity to heritage assets is assessed as a significant negative. The site is located within the settlement boundary and has good accessibility to services and facilities and areas of

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Wharf Road - BD055, BD071, BD071a, BD106, BD156

existing employment. However, the site's ecological value would have a negative effect.

The site has a planning history. Application reference SMD/2015/0684 was withdrawn. Site comprises previously developed land (formerly a school) immediately west of the junction of St John's Road and Tunstall Road and within the southern part of the land enclosed by the dismantled railway and the A527. The site was taken forward as a preferred option for consultation in April 2016 as part of the Wharf Road site (Core Strategy Broad Area 4).

The Extended Phase 1 Habitat Surveys and Local Wildlife Site Assessment (May 2017) considered that the site habitats are considered to be of nature conservation value at site level only and are not eligible for possible SBI / BAS status. However, the building on site has the potential to support bats and as such, requires further assessment. The site was also noted as potentially supporting reptiles.

There are seven Grade II Listed Buildings within the 400m buffer. The site was considered by the Council's Landscape, Local Green Space and Heritage Impact Study (August 2016) which notes that development would be unlikely to cause high adverse effects to the settings of the assets, however, mitigation should include screening along the southern edge of the site to reduce effects.

The site was considered by the Council's Landscape, Local Green Space and Heritage Impact Study (August 2016) to be of low landscape sensitivity. The study found that re-development of the site could improve local landscape character.

The site was proposed for inclusion in the July 2017 preferred option Local Plan as part of the Wharf Road site (Broad Area 4).

BD071, BD071a, BD106 and BD156

The site's proximity to services, facilities and existing areas of employment and proposed delivery of circa 265 dwellings should have a significant positive effect (note that this figure was from the original estimated capacity for the site in 2016 and does not reflect the increased capacity as the evidence base evolved in 2017). However there is scope that development of this site could have negative effects due to the site's ecological value and the development of greenfield land indicated on the predictive map of Best and Most Versatile agricultural land as an area where less than 20% of the land is likely to be BMV. The area has been identified as an appropriate area for housing in the adopted Core Strategy (Area 4).

The area has been identified as an appropriate area for housing in the adopted Core Strategy (Area 4). The potential landscape impact of development requires further assessment.

The sites making up the Broad Area were taken forward as a preferred option for consultation in April 2016.

Sites BD071 and BD071a are the largest of the sites enclosed by the dismantled railway and the A527. The sites comprise Knypersley View Farm and the fields surrounding it, enclosed by the dismantled railway to the west and Colliers Way to the east. The site extends south, adjacent to the railway line, to Newpool Road where the access for the farm is located. Sites BD106 and BD156 are within the south of

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Wharf Road - BD055, BD071, BD071a, BD106, BD156

the land enclosed by the dismantled railway and the A527 and comprise an existing property (Levens), gardens and adjacent fields within the south-west of the settlement. The sites also include the existing access track, extending east from the property to Tunstall Road. Coal outcrops are probable within the Area.

The Council's Extended Phase 1 Habitat Survey (2014) highlights the presence of species rich hedgerows, dense willow scrub and tall ruderal vegetation which are connected to a series of other hedgerows and habitats and form an important potentially biodiverse habitat mosaic with good connectivity and making a valuable contribution to the Biddulph Corridor as set out in the District's Strategic Green Infrastructure Network.

The Extended Phase 1 Habitat Surveys and Local Wildlife Site Assessment (May 2017) considered that the broadleaf woodland of sites BD071 & BD071A may be of ecological value and may allow for the site to gain SBI / BAS status once the vegetation has been fully recorded and that the sites offer potential to support bats, reptiles and amphibians. The study considered the habitats of sites BD106 and BD156 to be of nature conservation value at site level only and not eligible for possible SBI / BAS status. However, the building and some trees on site have the potential to support bats and as such, requires further assessment. The sites were also noted as potentially supporting reptiles.

There are seven Grade II Listed Buildings within the 400m buffer of sites BD071 and BD071a. The sites were considered by the Council's Landscape, Local Green Space and Heritage Impact Study (August 2016) which notes that due to topography and surrounding vegetation, development would be unlikely to cause high adverse effects to the settings of the assets. Mitigation may include screening in the south-eastern part of the sites.

There are seven Grade II Listed Buildings within the 400m buffer of sites BD106 and BD156. The sites were considered by the Council's Landscape, Local Green Space and Heritage Impact Study (August 2016) which notes that development would be unlikely to cause high adverse effects to the settings of the assets. To reduce effects, mitigation should include setting development back from the assets by keeping development to the west and north of the sites as well as employing screening along the eastern edges.

The sites BD071 and BD071a were considered by the Council's Landscape, Local Green Space and Heritage Impact Study (August 2016) to be of medium landscape sensitivity. The study found that the topography within the site is undulating, and so visual prominence of the site varies. The southern extent of the site is generally screened by surrounding vegetation. Visual prominence is higher in the north of the site, where the land rises up to a ridge. Site-specific landscape mitigation measures could include additional advanced planting on the ridge and western boundary. The sites BD106 and BD156 were considered by the Council's Landscape, Local Green Space and Heritage Impact Study (August 2016) to be of low landscape sensitivity. The study found that the sites were set back from the road and well screened by intervening vegetation and existing development. It was considered that development within the sites would not be visually prominent, and (in combination with development of the adjacent sites) could create a stronger settlement edge.

A comprehensive masterplan should be prepared for the Broad Area to take account of its ecological value, the need to maintain linear habitat connectivity along the

Biddulph

Wharf Road - BD055, BD071, BD071a, BD106, BD156

stream, demonstrating how development is contributing to the priorities and actions proposed for the Biddulph corridor (as set out in the Green Infrastructure Strategy) including providing access to the Biddulph Valley Way; the masterplan should also address landscape and heritage impact mitigation measures and respond to the presence of any shallow mine workings.

The overall Core Strategy Broad Area 4 was proposed for inclusion in the July 2017 preferred option Local Plan - to be known as Wharf Road.

Initial HRA Screening

No Likely Significant Effects (LSEs) have been identified in relation to the preferred option site allocations in Biddulph.

Coal Mining

Council Officers have corresponded with the Coal Authority about this area prior to and throughout the site selection process. Included below is the Coal Authority's view on these sites from Council correspondence with them in 2014. Note that they also responded to the Council's 'Site Options' consultation in 2015. (NB – map within this document shows approximate position of mine entries)

"The mining legacy features present on this site include mine entries (with their respective zones of influence), a small area of recorded past shallow working, and more extensive areas of probable shallow coal working associated with the coal outcrops that run north-south through the site.

The mine entries are mostly located along the northern and western site boundaries, along some are located more within the site. Mine entries should not be built above or within their zone of influence, even once treated. A developer will therefore need to undertake intrusive site investigations to locate these mine entries and determine their current condition followed by undertaking consequential treatment. Any layout would then need to try and locate the mine entries within landscaping belts, open space, roads etc. This will reduce the overall potential capacity. You should note however the zones of influence for the mine entries shown on our system are larger than what is likely to be the actual ZOI. These are defined on our system at 20m, this accounts for the fact that historic records were often inaccurate. The actual ZOI for a mine entry is based on the diameter of the shaft or adit, and the amount of ground above the rock cover. The actual ZOI is a splay of 45 degrees running upwards from the rockhead to the surface, consequently a typical 2m diameter shaft may actually only have a ZOI of 4 or 5 metres.

The other mining legacy features relate to recorded and probable historic shallow workings. These do not render a site undevelopable, so although these cover large tracts of the site, the site will still be developable and deliverable. Indeed new development has a positive impact on the environment by remediating shallow coal workings. The recorded areas are small, in these parts we have deposited records that shallow coal mining took place. In the probable areas we have evidence sufficient to reasonably believe that historic working may have taken place, the problem is that there was no requirement to deposit working plans until 1872 and even then not all operators complied.

In the areas of recorded and probable shallow coal workings the developer will need to review records and undertake intrusive site investigations to determine whether working has taken place and at what depth. Shallow coal working is considered that

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Wharf Road - BD055, BD071, BD071a, BD106, BD156

to be within 30m of the surface. Investigations will identify at what depth workings took place and if so how much competent rock cover exists over the workings. In broad terms you require 10 times competent rock cover above the workings, so a 1m thick coal seam worked would need 10m of rock above it to ensure that the land was not at risk of possible collapse. If remediation is required for the shallow coal workings there are two main options: either remove the remnant coal resource through prior extraction thereby leaving a safe and stable new development platform; or grout and fill the shallow coal workings with material such as Pulverised Fuel Ash or Concrete or a mixture. This can affect the delivery of sites in terms of the economic cost. Prior extraction or grouting can generally be undertaken within weeks or a few months at most, normally as part of the normal site preparation process, it shouldn't therefore undue delay the site coming forward.

Consequently you should not consider this site undeliverable, the mine entries are a constraint which may affect overall capacity, although these can be located within non-built areas such as open space, roads etc. We do regularly see sites coming forward that have more mining legacy features than this site and developers are able to overcome the issues and successfully deliver a residential scheme."

Minerals

No implications.

Options Consultation July 2015

Statutory bodies/stakeholders

SCC Highways - Acceptable in principle subject to access design and Transport Assessment.

*Note - this is intended to be a large development scheme also incorporating sites BD106, BD156, BD055, BD108. Access is intended from one of the roundabouts adjacent to the Meadows School (south) and from the road currently used to serve the telephone exchange (north).

Natural England - Natural England consider this may represent a strategic site – Has a Landscape & Visual Impact Assessment been carried out? Those sites taken forward to the next stage of the process may require LVIA in order to inform the development specification for the site. (This work has now been undertaken).

Historic England; BD055; BD106; BD108; and, BD156 - preferred housing allocations - It is not clear how the impact of the site allocations on the Grade II listed buildings (former Parsonage, school and the Church) and their setting, individually and cumulatively, has been considered. Further information on this is required. (This work has now been undertaken).

Environment Agency; Site not identified as being in an area likely to be affected by flooding. Need to have regard to the relevant River Basin Management Plan.

Coal Authority; Staffordshire Moorlands is an area where there have been significant coal mining activities which have left a legacy. Recommend that sites are assessed to determine if there coal related hazards which require remediation and the likely impact on mineral resources. Previous coal workings do not prevent

Biddulph

Wharf Road - BD055, BD071, BD071a, BD106, BD156

development of sites and therefore do not wish to recommend any sites are excluded from assessment on mining legacy grounds.

Severn Trent, Network Rail; no site specific comments

Developer/Agent/Owner – Land available.

Public response - 43 comments – 5 objections, 38 supports

Issues raised:

Objections

- Infrastructure - Schools are full.
- Infrastructure - Traffic / Transport - would create too much traffic, bypass would become dangerous.
- Infrastructure - Other - Query capacity of sewage works
- Landscape - loss of extensive views of countryside from bypass - significant for residents and visitors to the town (Biddulph is known as the 'Garden Town' of the Moorlands), ruin the character of the town
- Nature Conservation - impact on wildlife, stream on site, loss of trees and hedgerows.
- Amenity (e.g. noise, privacy, loss of light) - Detrimental impact on residential amenity.
- Scale of development - over-development of the town.
- Government Policy - Land is Green Belt and beyond the defensible boundary of the settlement, conflicts with Core Strategy Policy SO9 and C1.
- Other - topography of site would make building problematic, develop brownfield sites first, town centre is declining, no jobs being created in the town, population figures are national so query their accuracy, lack of demand - housing on Uplands Mill site is still for sale, query agricultural land classification of site? Consultation form is not straightforward to complete and requirement to complete one for each site is too onerous.

Support

- Infrastructure - Schools - easy access
- Infrastructure - Traffic / Transport - Bypass could cope with traffic and increased population
- Infrastructure - Other - availability of public transport, close to new health centre, residents could use BVW to access Gillow Heath playing fields
- Landscape - development here less of a visual impact than east side of town, land is not visually appealing from bypass
- Flood Risk - development of site would not add to existing flooding issues like it would elsewhere in the town
- Amenity (e.g. noise, privacy, loss of light) - site would not overlook existing properties
- Scale of development
- Government Policy - would not constitute 'urban creep', land is not Green Belt
- Other - good access to Town Centre so will attract people to the area and be more environmentally friendly, may also reduce traffic in town centre as residents would be near enough to walk, would re-balance Biddulph in the right direction, development supported in this location in the Council's Core Strategy, would benefit the town.

Biddulph

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Council comment –

- The District Council is working with the County Council on the issue of school capacity. The County has determined that additional school provision would be required to support housing growth at the Primary phase of education. At this early stage in the site selection process there are a number of options for delivering school capacity dependant on the sites selected to take forward.
- The Highway Authority does not raise any difficulties which would prevent the development of this site.
- United Utilities has advised that if appropriate measures for surface water disposal are included within development schemes then there should be no detrimental impact on the capacity of their infrastructure.
- Land is identified as being important to the setting of the settlement in the Council's Landscape & Settlement Character Assessment. A Landscape & Visual Impact Assessment will be undertaken during the plan production process and look at all preferred option sites suggesting mitigation measures where appropriate. The results will be incorporated into the Submission Version of the Local Plan.
- The Council has recently completed a Phase 1 Ecological Study for the District. This assessed sites included in the Site Options consultation. The site survey results will be used as part of the site selection process. Any other sites which come forward and are potentially suitable for development will also need to be assessed. The Study highlights the presence of trees and buildings with bat potential, species rich hedgerows, dense willow scrub and tall ruderal vegetation which are connected to a series of other hedgerows and habitats and form an important potentially biodiverse mosaic. This warrants the site being considered to have regionally important value. Owing to its ecological importance, any future development of this site will be considered in line with relevant NPPF and Core Strategy Policies. A number of precautionary surveys/actions are also recommended in the case of development.
- Amenity – issues such as overlooking will be assessed in detail once a site layout has been determined at the time a planning application is received and residents will have the opportunity to comment on the content of that application.
- It is not considered that development of this particular site would be out of proportion with the rest of the town. Any new development taking place will be subject to design policies contained within the new Local Plan – which will be subject to public consultation next year.
- The land in question is not Green Belt.
- The SHLAA has assessed more than 150 sites in and around Biddulph including brown field sites and these have been included as allocations where they are suitable, available and deliverable. However, there is not enough brownfield land to meet the town's requirements so green field sites also need to be included. Prioritising brown field land over greenfield in all circumstances is not part of Government policy. New employment land is proposed at the south of the

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town (BD117). New investment in the town would have knock-on positive effects for the town centre.

- National population figures are the starting point for assessing an area's objectively assessed housing needs – this is standard practice. The new Local Plan will cover a period to 2031 so lack of demand (perceived or actual) at one point in time is not a valid reason for not meeting the area's objectively assessed housing needs. The land does not have an agricultural land classification as it is within the urban area of Biddulph.

Preferred Sites and Boundaries Consultation - April 2016

Statutory bodies/stakeholders

Natural England: Natural England notes the proposed preferred site for allocation in Biddulph. We note that it is located close to and/or adjoining existing areas of open space and green infrastructure. Suitable enhancements of existing open spaces' may be required together with appropriate management (and funding thereof) in order to allow these open spaces to function effectively during the local plan period. Similarly, the development of these preferred sites (if progressed) will need to include suitable multi-functional green infrastructure. Adopted local plan spatial objectives SO8 & 9 refer together with policies such as DC1 Design Considerations, DC3 landscape and settlement setting, and C3 Green Infrastructure.

Council Response

The Council has produced a Draft Green Infrastructure Strategy for consultation alongside the next draft version of the Local Plan. The strategy identifies green infrastructure corridors around the towns and lists particular issues in relation to that corridor which can be addressed as part of the relevant site policy and / or at the planning application stage. Similarly, a public open space study is underway covering all designated public open spaces in the Staffordshire Moorlands. One of the areas this will advise on is where improvements are needed to these spaces and new development in the vicinity could contribute towards this. The Council has also designated Local Green Spaces in line with criteria set out in the NPPF and the Council will seek to facilitate improvements to these areas where required.

Staffordshire County Council: These sites are adjacent to, or overlap with a Biodiversity Alert Site. Design and layout should avoid impacts in this site, enhance it where possible, and maintain linear habitat connectivity.

Council Response

Comments noted. This will be reflected in the site policy and the Council's Green Infrastructure Strategy.

Staffordshire Wildlife Trust: Other sites which have potentially high ecology value are: BD 071 and 071a covered by FID 17 - regional ecological value. These should be assessed against the Staffordshire LWS criteria. There are also a number of species-rich hedgerows identified by the surveys.

Council Response

The conclusions from the Ecus LWS survey are that the broadleaf woodland may be of ecological value and may allow for the site to gain SBI/BAS status once the

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vegetation has been fully recorded. Furthermore, the site offers potential to support bats, reptiles and amphibians,

The following surveys/ actions are therefore recommended in order to establish SBI/ BAS status:

- Hedgerow survey following the HEGS methodology.
- Detailed vegetation survey to determine the status of the habitat mosaic.
- The buildings and trees which have the potential to support roosting bats needs to be further assessed.
- Reptile survey required.

Historic England: Map 4.5 Biddulph - BD055; BD106; BD108; and, BD156 - preferred housing allocations - It is not clear how the impact of the site allocations on the Grade II listed buildings (former Parsonage, school and the Church) and their setting, individually and cumulatively, has been considered. Further information on this is required.

Council Response

Heritage Impact of development on the site has been assessed in the Council's Landscape Impact Study (August 2016), the results for this site are:

BD071/BD071a

There are seven Grade II Listed Buildings within the 400m buffer. Due to topography and surrounding vegetation, development would be unlikely to cause high adverse effects to the settings of the assets. Mitigation may include screening in the south-eastern part of the site. Development in the site would change a large element of the HLC zone BBHECZ 3 (Historic Environment Character Assessment 2010). However, with sensitive design, this could be mitigated. Site suitable for development in heritage terms subject to appropriate masterplanning.

BD055

There are seven Grade II Listed Buildings within the 400m buffer. Development would be unlikely to cause high adverse effects to the settings of the assets, however, mitigation should include screening along the southern edge of the site to reduce effects. Development would not adversely affect the HLC zone BBHECZ 3 (Historic Environment Character Assessment 2010). Site suitable for development in heritage terms subject to appropriate masterplanning.

BD106/BD156

There are seven Grade II Listed Buildings within the 400m buffer. Development would be unlikely to cause high adverse effects to the settings of the assets. To reduce effects, mitigation should include setting development back from the assets by keeping development to the west and north of the site as well as employing screening along the eastern edges of the site. Development would not adversely affect the HLC zone BBHECZ 3 (Historic Environment Character Assessment 2010). Site suitable for development in heritage terms subject to appropriate masterplanning.

Biddulph Neighbourhood Plan Working Group: BD071, BD071a, BD106, BD156 -

Meets all criteria, provided that the water course and a decent wildlife corridor is kept as a stream and not diverted / culverted. This could be enhanced to form a nice town river walk linking the developments along this side of the bypass, recommended for inclusion.

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Developer/Agent/Owner: I write on behalf of my client Gallagher Developments Ltd with regard to the Local Plan Preferred Options Sites and Boundaries Consultation. Following the adoption of the Core Strategy in 2014 and the identification at that time for a prompt review to roll the plan forward to 2031, my client welcomes the progression of the Local Plan, and specifically this Preferred Options Sites and Boundaries consultation to consider how the identified development needs for the District in that period will be met. The Core Strategy provides an entirely appropriate basis for considering the most appropriate development strategy to meeting future needs, and my clients welcome the continued focus on the Market Towns in the District as the most sustainable locations for future growth. Indeed, you will be aware that they control a significant interest in "Core Strategy Broad Area 4" and welcome the proposed allocation of this land for development in principle. In light of that Gallagher Estates support the allocation of Core Strategy Broad Area 4 for development. The site is not located in the Green Belt and clearly represents a sustainable development opportunity that is well related to the existing urban form of Biddulph and its town centre. It is deliverable in that it has been demonstrated to be suitable, available and achievable, and the site's merits were reflected in the positive comments received from the Site Options Consultation in 2015 (e.g. support from the Highways Authority). Whilst some representors did highlight some environmental sensitivities (e.g. ecology and landscape) it is apparent that there are no overriding or particular constraints to development. However, these issues can be effectively addressed through an iterative masterplanning exercise that takes into account the detailed technical and environmental assessments that will be required to support a planning application, as well as best urban and landscape design practice. The clear intent would be to establish an appropriate form and character of development that would realise a high quality housing development which responds to the site's features and setting, reflects the local character, and is well integrated into its surroundings. Indeed, whilst Table 4.6 in the consultation paper refers to the delivery of 335 dwellings on the site, there is a clear need to optimise its residential capacity to ensure that the identified development needs for the town and the District are met. That will also be a critical consideration in the masterplanning process, and may require some flexibility and prioritisation in the design of an appropriate development scheme for the site (e.g. in relation to the extent and location of the public open spaces and the employment /mixed-use allocations).

Public Response

Issues Raised

- Question housing numbers for Biddulph – too many.
- Could development be phased?
- Impact on property values
- Build for demographic of occupants of new housing – older people.
- Use of Victoria Colliery and Childerplay Road for housing
- Inadequate highways
- Lack of employment.
- Query ecological value of site.
- Heritage impact.
- Residential amenity in relation to construction process.
- Site screening.

Council Response

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- **Question housing numbers for Biddulph – too many.**
The proportion of 20% of the District's housing development taking place in Biddulph has been through extensive consultation and public examination as it is taken from the Council's Core Strategy which was adopted in March 2014.
- **Could development be phased?**
The Local Plan is planning for the period up to 2031 so will allocate a number of sites in Biddulph in order to meet the need. These will not all be built at exactly the same time, they will come forward as the market demands.
- **Impact on property values**
Property values are not considered material in planning law.
- **Build for demographic of occupants of new housing – older people.**
The Local Plan will reflect the evidence gathered about the housing market. The key document is the Strategic Housing Market Assessment.
- **Use of Victoria Colliery and Childerplay Road for housing**
Sites at Victoria Colliery and Childerplay Road are within the Green Belt. Sites BD071, BD071a, BD106 and BD156 are not in the Green Belt. The Green Belt Review has considered the impact on the Green Belt the release of Victoria Colliery and Childerplay Road for development would have. Only the Victoria Colliery site was identified as being suitable for consideration for Green Belt release (in exceptional circumstances). In reaching a decision on which sites to include in the Local Plan, the Council must balance evidence and Government policy.
- **Inadequate highways**
County Council Highways have said that development here is acceptable in principle subject to access design and Transport Assessment.
- **Lack of employment.**
Employment sites are proposed at BD117 (opposite Victoria Business Park) and BD076a (north of BD071).
- **Query ecological value of site.**
Ecus Ltd conducted Phase 1 ecological survey (incorporating Local Wildlife Site Assessment) in 2016. It concluded that the habitats on BD055, BD106 and BD156 were considered to be of nature conservation value at the site level only and are not listed as an important habitat in the Staffordshire SBI guidelines. Species recorded on site were common and widespread both at a county and national level and it is considered unlikely that the site significantly supported any notable protected species. [Some predevelopment species surveys recommended]. Sites BD071 / BD071a contain broadleaf woodland which may be of ecological value and may allow for the site to gain SBI/BAS status once the vegetation has been fully recorded. Therefore, this also requires further survey work prior to any development taking place on the site.
- **Heritage impact.**
Heritage Impact of development on the site has been assessed in the Council's Landscape Impact Study (August 2016), the results for this site are:

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BD071/BD071a

There are seven Grade II Listed Buildings within the 400m buffer. Due to topography and surrounding vegetation, development would be unlikely to cause high adverse effects to the settings of the assets. Mitigation may include screening in the south-eastern part of the site. Development in the site would change a large element of the HLC zone BBHECZ 3 (Historic Environment Character Assessment 2010). However, with sensitive design, this could be mitigated. Site suitable for development in heritage terms subject to appropriate masterplanning.

BD055

There are seven Grade II Listed Buildings within the 400m buffer. Development would be unlikely to cause high adverse effects to the settings of the assets, however, mitigation should include screening along the southern edge of the site to reduce effects. Development would not adversely affect the HLC zone BBHECZ 3 (Historic Environment Character Assessment 2010). Site suitable for development in heritage terms subject to appropriate masterplanning.

BD106/BD156

There are seven Grade II Listed Buildings within the 400m buffer. Development would be unlikely to cause high adverse effects to the settings of the assets. To reduce effects, mitigation should include setting development back from the assets by keeping development to the west and north of the site as well as employing screening along the eastern edges of the site. Development would not adversely affect the HLC zone BBHECZ 3 (Historic Environment Character Assessment 2010). Site suitable for development in heritage terms subject to appropriate masterplanning.

- **Residential amenity in relation to construction process.**
Problems arising from the construction period of any works, e.g. noise, dust, construction vehicles, hours of working (covered by Control of Pollution Acts) are not material planning considerations.
- **Site screening.**
Site screening will be required as part of any new development. This can also help to act as a noise barrier.

Preferred Options Local Plan July 2017

Statutory bodies/stakeholders (Comments relate to Wharf Road Strategic Development Area as a whole):

Historic England - We note the generic statement within the policy that states that development proposals must comply with the mitigation measures set out in the assessment and we are not unsupportive of this approach, however, it is not always clear what specific mitigation measures are being suggested. We do not support the statement that masterplanning at development management stage is an appropriate mitigation measure where adverse impacts are identified at this stage, as once the Local Plan is adopted the principle of development on these allocations will have

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been accepted. In these instances we would require further information at the outset to ensure that the development of the site is appropriate and all mitigation measures have been appropriately identified. For example, paragraph 9.37 on page 142 cites that screening would be an appropriate mitigation measure, however, we cannot find the information that states what the impact to the significance of this heritage asset is and whether screening would therefore be an appropriate mitigation measure.

Response

Appropriate mitigation measures from the Heritage Impact Study have been incorporated into the relevant site policy and the evidence base was discussed at the meeting with Historic England.

Staffordshire County Council – Property - Support the following County owned land allocations including former Meadows Special School, Biddulph – part of a larger mixed use allocation.

Response

Support noted.

Environment Agency - Wharf Road – Biddulph: Welcome the intentions of this area (as detailed in paragraph 9.40) to contribute towards Water Framework Directive objectives. Happy to work with Council, Lead Local Flood Authority and developers to address the issues of the site such as the Preliminary Risk Assessment prior to an application being submitted via our Cost Recovery Advice service.

Response

Support noted.

United Utilities – We note the detailed policy DSB1. We recommend that this policy includes further details. Support delivery of development at the site in accordance with a comprehensive masterplan. Strongly encourage this masterplan to be completed prior to the submission of any planning application. In respect of paragraph 9.40, suggest the following extra wording at the end of the paragraph: "Any application submission will also be required to include a holistic site-wide drainage strategy for foul and surface water which considers how the site will be developed in various phases and most likely by various developers over a number of years. The drainage strategy should clearly demonstrate how the drainage in earlier phases of development interact with the wider phases of development and how the approach to foul and surface water drainage takes account of the flows from later phases of development. Given the availability of an on-site watercourse, only foul flows should be connected to the public sewerage system. Surface water should also be managed by sustainable drainage features.

Applicants should note that the site includes large public sewers and building over them will not be permitted. Applicants should engage in early pre-application dialogue with the respective water and waste water undertakers. The current waste water undertaker for the area is United Utilities."

Response

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It is considered appropriate to make amendments to paragraph 9.40 to reflect the issues raised.

Natural England - DSB 1 Wharf Road - Acknowledge that our previous comments on this site have been taken on board and that opportunities to make linkages to the wider GI network will be considered. This would include linking to the Biddulph Strategic corridor and Biddulph Valley Way, reduce fragmentation and increase ecological connectivity. De-culverting of the watercourse is also welcome.

Response

Support noted.

Developer/Agent/Owner – Owner supports inclusion of BD055, response received supporting the inclusion of the land at Levens (i.e. BD106 & BD156) from landowner's agent. Other owners support inclusion but no written response received to this consultation.

Public Response: 592 comments – 302 support, 281 object and 9 general*.

Main Issues Raised*:

Support:

- Recognises the future needs of Biddulph.
- Housing close to town centre will revitalise shopping centre and boost local trade.
- Development will bring investment and retail opportunities to Biddulph.
- Major housing developments are located within close proximity to local amenities (e.g. schools, doctors surgeries).
- Proximity to town centre will reduce the need to travel in the private car, reducing traffic, parking problems and pollution.
- Development will re-centralise the town centre and complete an area that is currently undeveloped. Historically, development has been focused to the east of the town.
- General feeling that the wishes of Biddulph residents have been listened to.
- Good access to existing transport infrastructure including the bypass.
- Infrastructure could be built to support the new housing development.
- Development would help improve quality and appearance of area, aiding regeneration.
- Limits the use of Green Belt land.
- Although this land is Green Belt, its release from the Green Belt is the less compromising when compared to other Green Belt areas. All brownfield sites in the area have already been selected for housing development.
- Development here will not compromise individuality of surrounding settlements or threaten historic assets.
- Although this land inclines to the west, it will be hidden from the town by mature trees along Biddulph Valley Way as well as by houses proposed on the eastern larger site.
- Development here would have a limited impact on the aesthetics of the area due to the lower elevation of the land.
- Development of a Green Infrastructure Strategy including strengthening links between town and countryside via Biddulph Valley Way, Biddulph Grange Garden and the Country Parks is welcomed.

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- Acknowledgement of surface water discharge problem.

Objection:

- Area to the west of the bypass is an area of outstanding beauty and gives an immediate impression of the town. Development will have an adverse effect on people's first impressions of the town.
- Green Belt land bordering the Biddulph bypass and looking towards Mow Cop and Congleton Edge is a beautiful area. Development here will have an adverse effect on views over the footings of Mow Cop, the rural nature and the beauty and tranquillity of the area.
- Housing overly concentrated in one particular area which will put pressure on the local infrastructure (e.g. wastewater). Should be dispersed more widely such as at Biddulph Moor.
- Housing is disproportionate to the need in Biddulph.
- Biddulph does not require more housing as there are many homes to rent/buy in the area.
- Smaller developments will have less impact on the town.
- Insufficient range of housing sites of different sizes capable of being delivered quickly within the early part of the plan period.
- Development here will result in a loss of the countryside and its wildlife and impact on biodiversity.
- The site falls within the Green Belt, which should only be developed in exceptional circumstances - could set precedent for future building in the Green Belt.
- Development should not cross Biddulph Valley Way - Biddulph Valley Way is the main recreational amenity in the town that should not be lost. Development here will detract from the enjoyment of Biddulph Valley Way, which is used by many walkers, runners and cyclists.
- The area is prone to flooding - Site is frequently waterlogged and a valuable defence in soaking up water, preventing floods further downstream.
- Brownfield land should be developed in the first instance.
- Unnecessary to build on Green Belt when there are alternative sites to develop, including at Victoria Colliery, Childerplay Lane, Meadows School and Biddulph Moor.
- Development will put pressure on local services, including schools, dentists, and GP surgeries which are at capacity.
- Insufficient sewerage infrastructure in place to support development.
- Insufficient road infrastructure to accommodate the new development.
- Development will have an adverse effect on roads, traffic congestion and air pollution, particularly the bypass.
- Site unsuitable for development due to destabilisation of land from mine shafts.
- Consideration should be given for renovation and improvement of existing town centre retail units before building new retail outlets.
- Existing green space is vital for health and well-being.
- Existing housing will be devalued due to their views of the countryside being lost.
- Proposed development is surrounded by less housing. It will therefore receive fewer objections.
- Three public footpaths would be affected by this development.
- The proposed Green Belt amendments to the east of the town and from the previous consultation have not been included.
- This area was not proposed previously.

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- Poor vehicular access.
- It has been suggested that this development would include a fast food outlet. Respondent objects to this.

***Note – these figures and issues raised cover the whole of the Wharf Road Strategic Development Area which is presented as a single site in the Local Plan so are not specific to these sites only.**

Council Response to all Issues Raised:

ISSUE	RESPONSE
Biddulph doesn't need more houses	The Council is required to produce a Local Plan and meet its Objectively Assessed Housing Needs. The plan period is up to 2031 so the Council is looking to meet future development needs. Development in Biddulph contributes to this.
Highways (Wharf Road)	The Council has been in close consultation with the County Highways Department throughout the Local Plan production process. County Highways have not objected to the principle of development on this site. Policy DSB1 (which relates to this site), requires a Transport Assessment in advance of any development taking place.
Education / Health (education, police and sewage only)	The Council has been liaising with the County Council Education Department throughout the Local Plan preparation process. The County considers that a new school is not needed in the town to accommodate new development. The Council also liaises with the relevant clinical commissioning group and no issues relating to lack of health infrastructure to accommodate new development have been raised to date.
Infrastructure – general	National planning guidance states that the Council should assess the quality and capacity of infrastructure to meet forecast demands. An Infrastructure Delivery Plan is being prepared which will identify the infrastructure necessary to support the Local Plan proposals. It builds on the findings of the Development Capacity Study for the Core Strategy. Consultation and work with infrastructure providers including utility companies is ongoing and their feedback will inform the Infrastructure Delivery Plan and the Local Plan.
Green Belt – BDNEW	The Council's Green Belt Review concludes that the site could be considered for release from the Green Belt provided that exceptional circumstances can be demonstrated. The exceptional circumstances relating to this site are that it will assist with bringing forward a large strategic mixed use regeneration site which is well related to the town centre and its key services and facilities. The Council has fully explored options for meeting its development needs without using Green Belt land. Biddulph is unique in that it is the only town in the Staffordshire Moorlands which is surrounded by Green Belt. This was taken into account at the time the Core Strategy was produced when Biddulph's housing proportion was less than the other towns at 20% of the total District housing figure to 2031. This proportion has been carried through into the Local Plan. Following recent consultation and

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ISSUE	RESPONSE
	evidence, the Council has reduced the amount of Green Belt land identified for development in Biddulph but there is not enough non-green belt land to meet all of the town's future development requirements.
Urban Sprawl – BDNEW	The Green Belt Review states that creation of a new settlement edge along the south-western boundary would prevent urban sprawl over the longer term. This is not explicit in the site policy DSB1 and it is considered appropriate to include this within the policy wording.
Flooding – Wharf Road	The plan policy associated with this site, DSB1, requires a site specific flood risk assessment and early discussions with the Lead Local Flood Authority in advance of any development taking place.
Loss of Wildlife - BDNEW	Policy DSB1 requires that the surveys and actions recommended by the Council's Extended Phase 1 Habitat Survey and Local Wildlife Assessment are implemented as well as provision of a landscaping plan. In addition, negative impacts should be avoided on the nearby Biodiversity Alert Site.
Use Green Belt land at Childerplay	Due to its Green Belt status, land at Childerplay has been considered in the Green Belt Review and it was concluded that it is not appropriate to release from the Green Belt. National planning policy requires the Council to minimise new development in the Green Belt and exceptional circumstances to justify release of land from the Green Belt must exist.
Need green space for health and well-being	The land is in private ownership and most is not publicly accessible. There are public footpaths across BDNEW – see response below.
Public Footpath – BDNEW	Public footpaths may be retained or redirected depending on the site layout which will be determined as part of the comprehensive masterplan. This would be finalised at the planning application stage.
Other sites / brownfield sites in Biddulph (general)	Other sites have been considered as part of the previous consultation prior to this area being selected for development. Other sites have been investigated and allocations are proposed in the plan where appropriate but there is not enough land on brownfield sites to meet Biddulph's housing needs to 2031.
Rear of Chells next to bypass	The fields bordering the bypass behind Chells Builders merchants are not available for development.
Air Quality (Wharf Road)	If the Council considered that a development may adversely impact on local air quality then the applicant is required to undertake air quality assessments to identify these issues and develop options to mitigate these impacts. In addition the Council continually monitors air quality across the District and regularly undertakes review and assessments of this data to identify areas where the traffic could have an unacceptable impact on local air quality. Policy SD4 covers controls of all forms of pollution arising from development. In addition, Policy DSB1 requires positioning of housing away from the

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ISSUE	RESPONSE
	immediate edge of the bypass to prevent noise and air quality issues.
Landscaping (Wharf Road)	The accompanying site policy (DSB1) requires a comprehensive masterplan to include provision of a landscaping plan to address recommendations set out in the Council's Landscape Study. These include additional planting on the ridge and along the boundary with the Biddulph Valley Way and screening in the south-eastern part of the site. In addition, landscaping will be used as a buffer between the residential and employment / retail development.
Wharf Road – non-Green Belt	The vast majority of the Wharf Road site (with the exception of land to the west of Biddulph Valley Way) is not in the Green Belt and falls within the existing town boundary.
Open Space	An open space study is currently underway and once the results are known the Local Plan maps will be updated accordingly.
Disagree with development on west side of BVW	Development exists on the west side of the Biddulph Valley Way elsewhere in the town.
Pennine Way	Rear of Pennine Way was considered at an earlier stage in the process but dismissed due to it not being considered suitable for release from the Green Belt in the Council's Green Belt Review.
Mining – Wharf Road	The relevant site policy (Policy DSB1), requires comprehensive masterplanning of this area to include detailed investigation work in relation to the mining legacy of the site before development can commence. The mine entries on the site will not be developed over even when treated in line with Coal Authority advice.
BVW – used for recreation	The Biddulph Valley Way would remain in situ so recreational use could continue.
Density	The housing numbers provided in the plan at this stage are an indicator of the number of dwellings which could be provided on the site. They assume a varied density (between 30 and 40 dwellings per hectare) taking into account known constraints. The actual number of houses which could be accommodated on the site will be determined at the planning application stage and be informed by a masterplan which will assess all the constraints in full detail.
House types	House types will be mixed and reflect market demand.
Victoria Colliery v BDNEW	The old Victoria Colliery site is also in the Green Belt and its brownfield status is debateable in its current state. It has been assessed as part of the Green Belt Review and considered suitable for release if exceptional circumstances can be demonstrated. This is the same position as BDNEW. However, it is considered that exceptional circumstances exist for the release of BDNEW, namely that this site will assist with bringing forward a large strategic mixed use regeneration site which is well related to the town centre and its key services

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ISSUE	RESPONSE
	and facilities. In comparison, it is considered difficult to justify the release of (part of) the Victoria Colliery site from the Green Belt. In reaching a decision on what sites to include in the Local Plan, the Council must balance evidence and Government policy.
Sequential Test	As part of any planning application, an applicant would have to demonstrate that there were no suitable sites within or on the edge of the town centre for a new foodstore before an approval could be granted on that site. This is known as the 'sequential test' and is part of Government planning policy.
Biddulph Moor instead	Biddulph Moor is surrounded by Green Belt and the Local Plan strategy is to focus the highest proportion of development in the towns.
Station Road	Land at Station Road is too small for an allocation but could come forward at any time through the planning applications process as it is in the town boundary.
Spread Development	Biddulph is surrounded by Green Belt so spreading development around would still result in some Green Belt development.
GI Strategy	The policy also requires that the priorities and actions identified in the Council's Green Infrastructure Strategy are incorporated into a development scheme.
BDNEW added at last minute	The Local Plan production process by its very nature is an evolving process. Drafts of the plan are produced, consultation is undertaken and changes are made to the plan throughout the process. BDNEW was suggested for consideration as part of the Preferred Sites and Boundaries Consultation. It was included at Preferred Options Stage and consultation has taken place, the results of which will be considered by the Council.
Negative impact on surrounding amenities	Amenity issues will be carefully considered at the planning application stage.
Development will lead to increased noise	Potential noise levels from new development will be assessed at the time a planning application is being considered in accordance with the latest noise guidance available at that time which currently states that noise is a material consideration in the planning process and a key aspect of sustainable development.
Empty Properties already exist	Empty properties are already taken into account when calculating housing need figures.
Property Values	Property values are not material in planning law.
Affordable Housing	Policy H3 of the Local Plan requires a target of 33% affordable housing on the site. The types of affordable housing will meet demand in the area in order to help address existing affordability issues.
Density levels	Assumed densities for this area are relatively low at 30-35 dwellings per hectare. Actual density levels will be determined through a masterplan process once all the constraints can be assessed in full detail.

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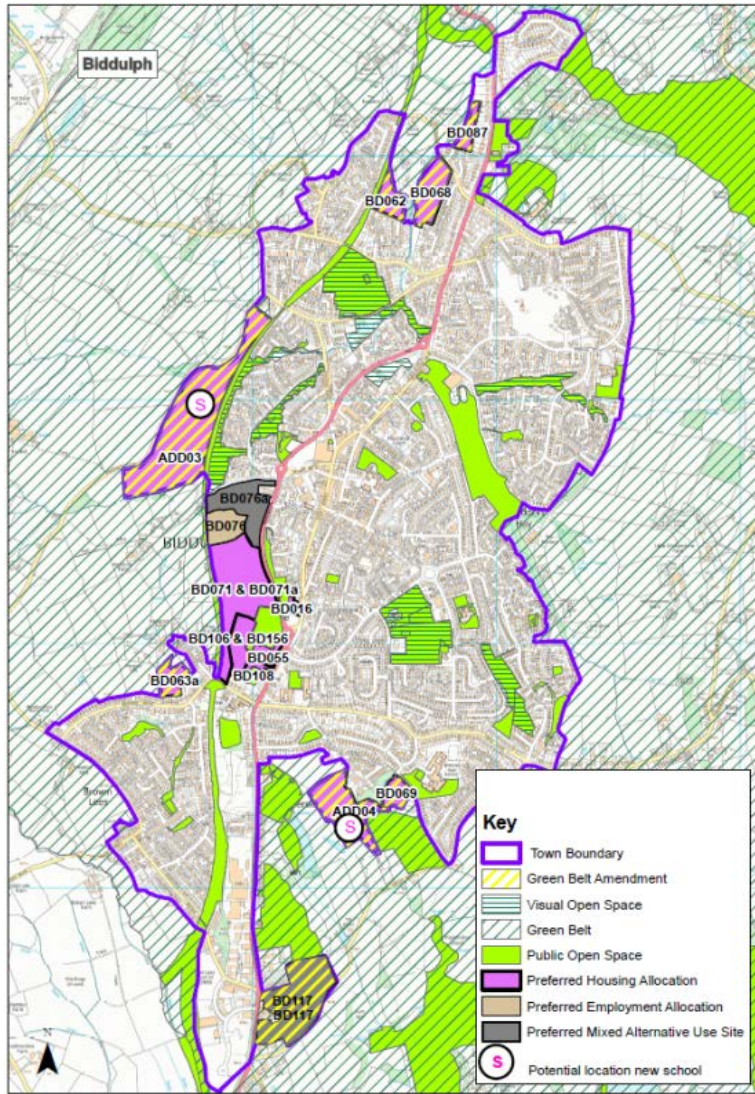
ISSUE	RESPONSE
Heritage Impact	A Heritage Impact Assessment of the whole area has been undertaken and it has been deemed suitable for development in heritage terms.

Local Plan Publication (Submission Version February 2018)

Refer to Staffordshire Moorlands Local Plan (Submission Version) Consultation Analysis Report May 2018.

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BD016

Biddulph

BD016 Land & buildings at Beehive Farm 16 Tunstall Road

Local Plan Process

- Site suggestion from the SHLAA
- Included in the options consultation July 2015
- Included in the Preferred Options consultation April 2016
- Included in the Preferred Options Local Plan July 2017
- Included in Submission Version Local Plan (February 2018) - part of Wharf Road Strategic Development Area

Current Position

Site taken forward into Submission Version Local Plan due to:

- Within the built up area boundary
- Site to be developed as part of a wider regeneration opportunity including land to the west side of the bypass to bring forward a large strategic mixed use regeneration site which is well related to the town centre and its key services and facilities.
- reasons set out below under 'key issues' heading.

Key Issues

- Close to facilities
- Low ecological value (but survey work on on-site trees recommended for location, quantity, age and size).
- Low landscape sensitivity
- Suitable for development in heritage terms

Site Information

Greenfield/ brownfield	Built up area boundary/ countryside	Est. housing capacity	Area (ha)	Ownership status	Site details
Brownfield/ greenfield	Within settlement boundary, close to town centre	20 at 40dph (gross)	0.5 (gross)	Owner willing to release	<ul style="list-style-type: none"> • Farm/small holding and adjoining land • Slopes down from the bypass • Not visually prominent

Studies

Local Plan and Site Allocations Viability Study (May 2018)

The results of the viability testing for Wharf Road (DSB1) shows that the development of this site could support 20% affordable housing provision with surplus of £50 per sq.m. This level of surplus would also be sufficient to support the cost of education contributions and requirements to achieve M4 (2). At 33% affordable provision Wharf Road generates a zero surplus. These results indicate that this development would not be sufficiently financially viable to support 33% affordable housing together with contributions to education and requirements for M4 (2).

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Local Plan Housing Trajectory

The site is in the housing trajectory (included within DSB1) to begin within five years and complete by the end of the plan period (2020/21 - 2031).

Accelerated Housing Delivery Programme

The Council is taking a pro-active approach to delivery of housing in the District through its accelerated housing delivery programme (agreed at Cabinet on 24th April 2018).

Masterplanning work is being undertaken on key sites including the Wharf Road Strategic Development Area (as stated in Policy DSB1) with the aim of bringing together landowner aspirations and assessing site constraints to produce options for site layouts, valuations and delivery plans in order to help bring the sites to fruition.

Extended Phase 1 Habitat Survey 2015 (FID 115)

The site has been attributed a low ecological value in its potential to support protected species as the habitats are species poor and poorly connected to other more biodiverse habitats. The following surveys/ actions are therefore recommended prior to any potential development works being carried out:

- Vegetation removal at the appropriate time of year

Local Wildlife Assessment (ECUS, 2016)

The site has low ecological value in its potential to support protected species. The site habitats are considered to be of nature conservation value at site level only. However, more information is required regarding the scattered trees on site in order to establish their ecological importance. The following surveys/ actions are therefore recommended in order to establish SBI/ BAS status:

- Assessment of the trees for location, quantity, age and size.

Landscape, Local Green Space & Heritage Impact Study (August 2016)

Landscape Results

Beehive Farm and adjacent land, enclosed by Colliers Way to the west and Tunstall Road to the east. The existing development within the site does not contribute to a well-defined settlement edge, and therefore development of the site could strengthen the settlement edge. Adjacent land to south of site is also of low landscape sensitivity, and could further improve the settlement edge (or be used to create a vegetated edge to the settlement). **Site is of low landscape sensitivity.**

Heritage Results

There are seven Grade II Listed Buildings within the 400m buffer. The church tower was visible from the site however due to the topography of the landscape, development would be unlikely to adversely affect its setting. Due to the large road junction and intervening buildings, development would be unlikely to cause high adverse effects to the settings of the remaining designated assets. Development in the site would change a small element of the HLC zone BBHECZ 3, although for the most part it would remain unaltered (Historic Environment Character Assessment 2010).

Site suitable for development in heritage terms.

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Sustainability Appraisal

Sustainability Appraisal Submission Version June 2018

The site should deliver a quantum of housing, circa 20 dwellings which is likely to have a significant positive effect, as could the location of the site with regard to its proximity to services and facilities and areas of existing employment as well as the positive effect upon the landscape. The site is located within the settlement boundary and has good accessibility to health care services and facilities. However, its proximity to heritage assets would have a negative effect. The site is indicated on the predictive map of Best and Most Versatile agricultural land as urban / industrial.

The site comprises Beehive Farm and adjacent land, enclosed by Colliers Way to the west and Tunstall Road to the east. The site was taken forward as a preferred option for consultation in April 2016.

The site is located close to and / or adjoining existing areas of open space and green infrastructure. Suitable enhancements of existing open spaces and / or the provision of links may be required together with appropriate management via contribution to the Council's Green Infrastructure Network.

The Extended Phase 1 Habitat Surveys and Local Wildlife Site Assessment (May 2017) considered that the site has low ecological value in its potential to support protected species. The site habitats are considered to be of nature conservation value at site level only. However, more information is required regarding the scattered trees on site in order to establish their ecological importance.

There are seven Grade II Listed Buildings within the 400m buffer. The site was considered by the Council's Landscape, Local Green Space and Heritage Impact Study (August 2016) which notes that the church tower was visible from the site however due to the topography of the landscape, development would be unlikely to adversely affect its setting. Due to the large road junction and intervening buildings, development would be unlikely to cause high adverse effects to the settings of the remaining designated assets.

The site was considered by the Council's Landscape, Local Green Space and Heritage Impact Study (August 2016) to be of low landscape sensitivity. The study found that the existing development within the site does not contribute to a well-defined settlement edge, and therefore development of the site could strengthen the settlement edge.

The site was proposed for inclusion in the July 2017 preferred option Local Plan.

Initial HRA Screening

No Likely Significant Effects (LSEs) have been identified in relation to the preferred option site allocations in Biddulph.

Minerals

No implications.

Options Consultation July 2015

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Statutory bodies/stakeholders:

Historic England: Made no comments on individual sites recommended that a heritage impact assessment of sites is carried out. (Note – this work has now been undertaken).

Environment Agency: Site not identified as being in an area likely to be affected by flooding. Need to have regard to the relevant River Basin Management Plan.

Coal Authority: Staffordshire Moorlands is an area where there have been significant coal mining activities which have left a legacy. Recommend that sites are assessed to determine if there coal related hazards which require remediation and the likely impact on mineral resources. Previous coal workings do not prevent development of sites and therefore do not wish to recommend any sites are excluded from assessment on mining legacy grounds.

United Utilities, Severn Trent, Heritage England, Natural England, Network Rail: no site specific comments

SCC Highways – Access should be gained off Tunstall Road, with no access off the bypass.

Developer/Agent/Owner – Land available.

Public response 6 Comments – all support

Issues raised:

- Infrastructure - Schools - easy access
- Infrastructure - Traffic / Transport - easy access
- Infrastructure - Other - easy access to health services
- Landscape
- Government Policy - Not Green Belt
- Other - Improve appearance of area, Infill development

Council Comment – Comments noted

Preferred Options Consultation April 2016

Statutory bodies/stakeholders:

Natural England: notes the proposed preferred site for allocation in Biddulph. We note that it is located close to and/or adjoining existing areas of open space and green infrastructure. Suitable enhancements of existing open spaces' may be required together with appropriate management (and funding thereof) in order to allow these open spaces to function effectively during the local plan period. Similarly the development of these preferred sites (if progressed) will need to include suitable multi-functional green infrastructure. Adopted local plan spatial objectives SO8 & 9 refer together with policies such as DC1 Design Considerations, DC3 landscape and settlement setting, and C3 Green Infrastructure.

Council Response

The Council has produced a Draft Green Infrastructure Strategy for consultation alongside the next draft version of the Local Plan. The strategy identifies green

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infrastructure corridors around the towns and lists particular issues in relation to that corridor which can be addressed as part of the relevant site policy and / or at the planning application stage. Similarly, a public open space study is underway covering all designated public open spaces in the Staffordshire Moorlands. One of the areas this will advise on is where improvements are needed to these spaces and new development in the vicinity could contribute towards this. The Council has also designated Local Green Spaces in line with criteria set out in the NPPF and the Council will seek to facilitate improvements to these areas where required.

Developer/Agent/Owner – no response.

Public Response:

25 objections
146 support

Issues raised:

No further details from objectors as to why they object.

Preferred Options Consultation (July 2017)

Statutory bodies/stakeholders (Comments relate to Wharf Road Strategic Development Area as a whole):

Historic England - We note the generic statement within the policy that states that development proposals must comply with the mitigation measures set out in the assessment and we are not unsupportive of this approach, however, it is not always clear what specific mitigation measures are being suggested. We do not support the statement that masterplanning at development management stage is an appropriate mitigation measure where adverse impacts are identified at this stage, as once the Local Plan is adopted the principle of development on these allocations will have been accepted. In these instances we would require further information at the outset to ensure that the development of the site is appropriate and all mitigation measures have been appropriately identified. For example, paragraph 9.37 on page 142 cites that screening would be an appropriate mitigation measure, however, we cannot find the information that states what the impact to the significance of this heritage asset is and whether screening would therefore be an appropriate mitigation measure.

Response

Appropriate mitigation measures from the Heritage Impact Study have been incorporated into the relevant site policy and the evidence base was discussed at the meeting with Historic England.

Environment Agency - Wharf Road – Biddulph: Welcome the intentions of this area (as detailed in paragraph 9.40) to contribute towards Water Framework Directive objectives. Happy to work with Council, Lead Local Flood Authority and developers to address the issues of the site such as the Preliminary Risk Assessment prior to an application being submitted via our Cost Recovery Advice service.

Response

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Support noted.

United Utilities – We note the detailed policy DSB1. We recommend that this policy includes further details. Support delivery of development at the site in accordance with a comprehensive masterplan. Strongly encourage this masterplan to be completed prior to the submission of any planning application. In respect of paragraph 9.40, suggest the following extra wording at the end of the paragraph: “Any application submission will also be required to include a holistic site-wide drainage strategy for foul and surface water which considers how the site will be developed in various phases and most likely by various developers over a number of years. The drainage strategy should clearly demonstrate how the drainage in earlier phases of development interact with the wider phases of development and how the approach to foul and surface water drainage takes account of the flows from later phases of development. Given the availability of an on-site watercourse, only foul flows should be connected to the public sewerage system. Surface water should also be managed by sustainable drainage features.

Applicants should note that the site includes large public sewers and building over them will not be permitted. Applicants should engage in early pre-application dialogue with the respective water and waste water undertakers. The current waste water undertaker for the area is United Utilities.”

Response

It is considered appropriate to make amendments to paragraph 9.40 to reflect the issues raised.

Natural England - DSB 1 Wharf Road - Acknowledge that our previous comments on this site have been taken on board and that opportunities to make linkages to the wider GI network will be considered. This would include linking to the Biddulph Strategic corridor and Biddulph Valley Way, reduce fragmentation and increase ecological connectivity. De-culverting of the watercourse is also welcome.

Response

Support noted.

Developer/Agent/Owner – No response at this stage – land still available.

Public Response: 592 comments – 302 support, 281 object and 9 general*.

Main Issues Raised*:

Support:

- Recognises the future needs of Biddulph.
- Housing close to town centre will revitalise shopping centre and boost local trade.
- Development will bring investment and retail opportunities to Biddulph.
- Major housing developments are located within close proximity to local amenities (e.g. schools, doctors surgeries).
- Proximity to town centre will reduce the need to travel in the private car, reducing traffic, parking problems and pollution.

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- Development will re-centralise the town centre and complete an area that is currently undeveloped. Historically, development has been focused to the east of the town.
- General feeling that the wishes of Biddulph residents have been listened to.
- Good access to existing transport infrastructure including the bypass.
- Infrastructure could be built to support the new housing development.
- Development would help improve quality and appearance of area, aiding regeneration.
- Limits the use of Green Belt land.
- Although this land is Green Belt, its release from the Green Belt is the less compromising when compared to other Green Belt areas. All brownfield sites in the area have already been selected for housing development.
- Development here will not compromise individuality of surrounding settlements or threaten historic assets.
- Although this land inclines to the west, it will be hidden from the town by mature trees along Biddulph Valley Way as well as by houses proposed on the eastern larger site.
- Development here would have a limited impact on the aesthetics of the area due to the lower elevation of the land.
- Development of a Green Infrastructure Strategy including strengthening links between town and countryside via Biddulph Valley Way, Biddulph Grange Garden and the Country Parks is welcomed.
- Acknowledgement of surface water discharge problem.

Objection:

- Area to the west of the bypass is an area of outstanding beauty and gives an immediate impression of the town. Development will have an adverse effect on people's first impressions of the town.
- Green Belt land bordering the Biddulph bypass and looking towards Mow Cop and Congleton Edge is a beautiful area. Development here will have an adverse effect on views over the footings of Mow Cop, the rural nature and the beauty and tranquillity of the area.
- Housing overly concentrated in one particular area which will put pressure on the local infrastructure (e.g. wastewater). Should be dispersed more widely such as at Biddulph Moor.
- Housing is disproportionate to the need in Biddulph.
- Biddulph does not require more housing as there are many homes to rent/buy in the area.
- Smaller developments will have less impact on the town.
- Insufficient range of housing sites of different sizes capable of being delivered quickly within the early part of the plan period.
- Development here will result in a loss of the countryside and its wildlife and impact on biodiversity.
- The site falls within the Green Belt, which should only be developed in exceptional circumstances - could set precedent for future building in the Green Belt.
- Development should not cross Biddulph Valley Way - Biddulph Valley Way is the main recreational amenity in the town that should not be lost. Development here will detract from the enjoyment of Biddulph Valley Way, which is used by many walkers, runners and cyclists.
- The area is prone to flooding - Site is frequently waterlogged and a valuable defence in soaking up water, preventing floods further downstream.

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- Brownfield land should be developed in the first instance.
- Unnecessary to build on Green Belt when there are alternative sites to develop, including at Victoria Colliery, Childerplay Lane, Meadows School and Biddulph Moor.
- Development will put pressure on local services, including schools, dentists, and GP surgeries which are at capacity.
- Insufficient sewerage infrastructure in place to support development.
- Insufficient road infrastructure to accommodate the new development.
- Development will have an adverse effect on roads, traffic congestion and air pollution, particularly the bypass.
- Site unsuitable for development due to destabilisation of land from mine shafts.
- Consideration should be given for renovation and improvement of existing town centre retail units before building new retail outlets.
- Existing green space is vital for health and well-being.
- Existing housing will be devalued due to their views of the countryside being lost.
- Proposed development is surrounded by less housing. It will therefore receive fewer objections.
- Three public footpaths would be affected by this development.
- The proposed Green Belt amendments to the east of the town and from the previous consultation have not been included.
- This area was not proposed previously.
- Poor vehicular access.
- It has been suggested that this development would include a fast food outlet. Respondent objects to this.

***Note – these figures and issues raised cover the whole of the Wharf Road Strategic Development Area which is presented as a single site in the Local Plan so are not specific to these sites only.**

Council Response to all Issues Raised:

ISSUE	RESPONSE
Biddulph doesn't need more houses	The Council is required to produce a Local Plan and meet its Objectively Assessed Housing Needs. The plan period is up to 2031 so the Council is looking to meet future development needs. Development in Biddulph contributes to this.
Highways (Wharf Road)	The Council has been in close consultation with the County Highways Department throughout the Local Plan production process. County Highways have not objected to the principle of development on this site. Policy DSB1 (which relates to this site), requires a Transport Assessment in advance of any development taking place.
Education / Health (education, police and sewage only)	The Council has been liaising with the County Council Education Department throughout the Local Plan preparation process. The County considers that a new school is not needed in the town to accommodate new development. The Council also liaises with the relevant clinical commissioning group and no issues relating to lack of health infrastructure to accommodate new development have been raised to date.
Infrastructure – general	National planning guidance states that the Council should assess the quality and capacity of infrastructure to meet forecast demands. An Infrastructure Delivery Plan is being prepared which will identify the infrastructure necessary to

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ISSUE	RESPONSE
	support the Local Plan proposals. It builds on the findings of the Development Capacity Study for the Core Strategy. Consultation and work with infrastructure providers including utility companies is ongoing and their feedback will inform the Infrastructure Delivery Plan and the Local Plan.
Green Belt – BDNEW	The Council's Green Belt Review concludes that the site could be considered for release from the Green Belt provided that exceptional circumstances can be demonstrated. The exceptional circumstances relating to this site are that it will assist with bringing forward a large strategic mixed use regeneration site which is well related to the town centre and its key services and facilities. The Council has fully explored options for meeting its development needs without using Green Belt land. Biddulph is unique in that it is the only town in the Staffordshire Moorlands which is surrounded by Green Belt. This was taken into account at the time the Core Strategy was produced when Biddulph's housing proportion was less than the other towns at 20% of the total District housing figure to 2031. This proportion has been carried through into the Local Plan. Following recent consultation and evidence, the Council has reduced the amount of Green Belt land identified for development in Biddulph but there is not enough non-green belt land to meet all of the town's future development requirements.
Urban Sprawl – BDNEW	The Green Belt Review states that creation of a new settlement edge along the south-western boundary would prevent urban sprawl over the longer term. This is not explicit in the site policy DSB1 and it is considered appropriate to include this within the policy wording.
Flooding – Wharf Road	The plan policy associated with this site, DSB1, requires a site specific flood risk assessment and early discussions with the Lead Local Flood Authority in advance of any development taking place.
Loss of Wildlife - BDNEW	Policy DSB1 requires that the surveys and actions recommended by the Council's Extended Phase 1 Habitat Survey and Local Wildlife Assessment are implemented as well as provision of a landscaping plan. In addition, negative impacts should be avoided on the nearby Biodiversity Alert Site.
Use Green Belt land at Childerplay	Due to its Green Belt status, land at Childerplay has been considered in the Green Belt Review and it was concluded that it is not appropriate to release from the Green Belt. National planning policy requires the Council to minimise new development in the Green Belt and exceptional circumstances to justify release of land from the Green Belt must exist.
Need green space for health and well-being	The land is in private ownership and most is not publicly accessible. There are public footpaths across BDNEW – see response below.
Public Footpath – BDNEW	Public footpaths may be retained or redirected depending on the site layout which will be determined as part of the comprehensive masterplan. This would be finalised at the planning application stage.

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ISSUE	RESPONSE
Other sites / brownfield sites in Biddulph (general)	Other sites have been considered as part of the previous consultation prior to this area being selected for development. Other sites have been investigated and allocations are proposed in the plan where appropriate but there is not enough land on brownfield sites to meet Biddulph's housing needs to 2031.
Rear of Chells next to bypass	The fields bordering the bypass behind Chells Builders merchants are not available for development.
Air Quality (Wharf Road)	If the Council considered that a development may adversely impact on local air quality then the applicant is required to undertake air quality assessments to identify these issues and develop options to mitigate these impacts. In addition the Council continually monitors air quality across the District and regularly undertakes review and assessments of this data to identify areas where the traffic could have an unacceptable impact on local air quality. Policy SD4 covers controls of all forms of pollution arising from development. In addition, Policy DSB1 requires positioning of housing away from the immediate edge of the bypass to prevent noise and air quality issues.
Landscaping (Wharf Road)	The accompanying site policy (DSB1) requires a comprehensive masterplan to include provision of a landscaping plan to address recommendations set out in the Council's Landscape Study. These include additional planting on the ridge and along the boundary with the Biddulph Valley Way and screening in the south-eastern part of the site. In addition, landscaping will be used as a buffer between the residential and employment / retail development.
Wharf Road – non-Green Belt	The vast majority of the Wharf Road site (with the exception of land to the west of Biddulph Valley Way) is not in the Green Belt and falls within the existing town boundary.
Open Space	An open space study is currently underway and once the results are known the Local Plan maps will be updated accordingly.
Disagree with development on west side of BVW	Development exists on the west side of the Biddulph Valley Way elsewhere in the town.
Pennine Way	Rear of Pennine Way was considered at an earlier stage in the process but dismissed due to it not being considered suitable for release from the Green Belt in the Council's Green Belt Review.
Mining – Wharf Road	The relevant site policy (Policy DSB1), requires comprehensive masterplanning of this area to include detailed investigation work in relation to the mining legacy of the site before development can commence. The mine entries on the site will not be developed over even when treated in line with Coal Authority advice.
BVW – used for recreation	The Biddulph Valley Way would remain in situ so recreational use could continue.

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ISSUE	RESPONSE
Density	The housing numbers provided in the plan at this stage are an indicator of the number of dwellings which could be provided on the site. They assume a varied density (between 30 and 40 dwellings per hectare) taking into account known constraints. The actual number of houses which could be accommodated on the site will be determined at the planning application stage and be informed by a masterplan which will assess all the constraints in full detail.
House types	House types will be mixed and reflect market demand.
Victoria Colliery v BDNEW	The old Victoria Colliery site is also in the Green Belt and its brownfield status is debateable in its current state. It has been assessed as part of the Green Belt Review and considered suitable for release if exceptional circumstances can be demonstrated. This is the same position as BDNEW. However, it is considered that exceptional circumstances exist for the release of BDNEW, namely that this site will assist with bringing forward a large strategic mixed use regeneration site which is well related to the town centre and its key services and facilities. In comparison, it is considered difficult to justify the release of (part of) the Victoria Colliery site from the Green Belt. In reaching a decision on what sites to include in the Local Plan, the Council must balance evidence and Government policy.
Sequential Test	As part of any planning application, an applicant would have to demonstrate that there were no suitable sites within or on the edge of the town centre for a new foodstore before an approval could be granted on that site. This is known as the 'sequential test' and is part of Government planning policy.
Biddulph Moor instead	Biddulph Moor is surrounded by Green Belt and the Local Plan strategy is to focus the highest proportion of development in the towns.
Station Road	Land at Station Road is too small for an allocation but could come forward at any time through the planning applications process as it is in the town boundary.
Spread Development	Biddulph is surrounded by Green Belt so spreading development around would still result in some Green Belt development.
GI Strategy	The policy also requires that the priorities and actions identified in the Council's Green Infrastructure Strategy are incorporated into a development scheme.
BDNEW added at last minute	The Local Plan production process by its very nature is an evolving process. Drafts of the plan are produced, consultation is undertaken and changes are made to the plan throughout the process. BDNEW was suggested for consideration as part of the Preferred Sites and Boundaries Consultation. It was included at Preferred Options Stage and consultation has taken place, the results of which will be considered by the Council.
Negative impact on surrounding amenities	Amenity issues will be carefully considered at the planning application stage.

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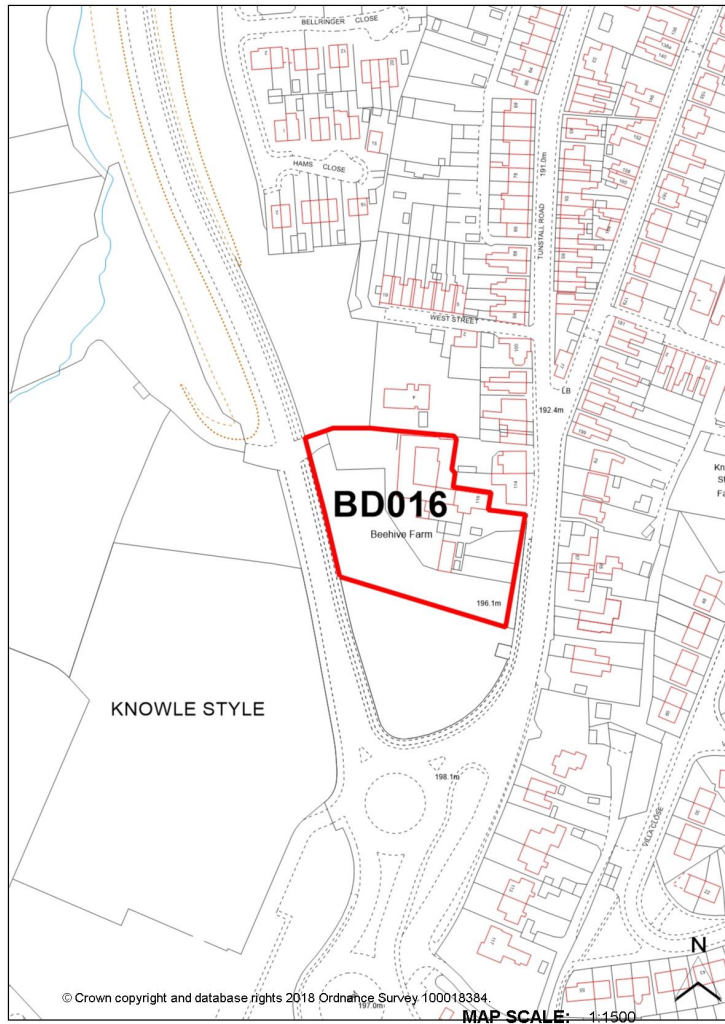
ISSUE	RESPONSE
Development will lead to increased noise	Potential noise levels from new development will be assessed at the time a planning application is being considered in accordance with the latest noise guidance available at that time which currently states that noise is a material consideration in the planning process and a key aspect of sustainable development.
Empty Properties already exist	Empty properties are already taken into account when calculating housing need figures.
Property Values	Property values are not material in planning law.
Affordable Housing	Policy H3 of the Local Plan requires a target of 33% affordable housing on the site. The types of affordable housing will meet demand in the area in order to help address existing affordability issues.
Density levels	Assumed densities for this area are relatively low at 30-35 dwellings per hectare. Actual density levels will be determined through a masterplan process once all the constraints can be assessed in full detail.
Heritage Impact	A Heritage Impact Assessment of the whole area has been undertaken and it has been deemed suitable for development in heritage terms.

Local Plan Publication (Submission Version February 2018)

Refer to Staffordshire Moorlands Local Plan (Submission Version) Consultation Analysis Report May 2018.

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Picture 9.4

BD076 / BD076a

Biddulph
BD076 & BD076a Land West of Biddulph Bypass

Local Plan Process

- Part of allocation for employment / leisure and non-food retail in Biddulph Town Centre Area Action Plan
- Site included in Council's SELAA employment database on basis of AAP allocation and subsequent outline retail consent on part of site (illustrating how northern part could accommodate employment development in accord with AAP); and given the Council's 2008 District Employment Land Study identified northern section as employment opportunity land.
- Included in the options consultation July 2015
- Included in the Preferred Options consultation April 2016 with a larger site boundary to include existing employment units and land in County and District ownership.
- Included in Preferred Options Local Plan July 2017 as part of 'Wharf Road Strategic Development Area'.
- Included in Submission Version Local Plan (February 2018) as part of 'Wharf Road Strategic Development Area'.

Current Position

Site taken forward into Submission Version Local Plan due to:

- Site is within the settlement boundary.
- Site to be developed as part of a wider regeneration opportunity including land to the south to bring forward a large strategic mixed use regeneration site which is well related to the town centre and its key services and facilities.
- reasons set out below under 'key issues' heading.

Key Issues

- Access is good - site is adjacent to bypass and on the edge of the Town Centre.
- Part of larger mixed use development area.
- BD076 included for employment at Preferred Sites and Boundaries Stage.
- BD076a a mixed alternative use site (food retail and possibly employment) at Preferred Sites and Boundaries Stage.
- Good infrastructure links.
- Ecology – Further survey work recommended in order to establish SBI/BAS status.
- Potential coal mining impact on the site – investigative work would be required by developer.
- Both sites are suitable for development in heritage terms.
- (BD076) Site is of medium landscape sensitivity and site-specific landscape mitigation measures would be appropriate. (BD076a) site is of low landscape sensitivity.
- Possible issues with contamination as the sites are located above historic landfill areas.
- Council's Retail Study recommends a retail allocation in the area.

Site Information

Greenfield/ brownfield	Built up area boundary/ countryside	Est. housing capacity	Area (ha)	Ownership status	Site details
Greenfield / Brownfield mix	Within existing Biddulph settlement	100+ (if used for 100%)	4.31 (gross)	Majority is available for development	<ul style="list-style-type: none"> • Mostly agricultural land

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BD076 & BD076a Land West of Biddulph Bypass

	boundary	housing) At 28.9dph (gross)		Land occupied by the coach company may be. There is a very small area of land abutting the railway where the ownership is unknown as it is not registered. No owner has yet come forward.	<ul style="list-style-type: none"> • Relatively flat • Some employment uses on the land abutting the old Wharf Road.
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Studies

Local Plan and Site Allocations Viability Study (May 2018)

The results of the viability testing for Wharf Road (DSB1) shows that the development of this site could support 20% affordable housing provision with surplus of £50 per sq.m. This level of surplus would also be sufficient to support the cost of education contributions and requirements to achieve M4 (2). At 33% affordable provision Wharf Road generates a zero surplus. These results indicate that this development would not be sufficiently financially viable to support 33% affordable housing together with contributions to education and requirements for M4 (2).

Local Plan Housing Trajectory

The site is in the housing trajectory (included within DSB1) to begin within five years and complete by the end of the plan period (2020/21 - 2031).

Accelerated Housing Delivery Programme

The Council is taking a pro-active approach to delivery of housing in the District through its accelerated housing delivery programme (agreed at Cabinet on 24th April 2018).

Masterplanning work is being undertaken on key sites including the Wharf Road Strategic Development Area (as stated in Policy DSB1) with the aim of bringing together landowner aspirations and assessing site constraints to produce options for site layouts, valuations and delivery plans in order to help bring the sites to fruition.

Extended Phase 1 Habitat Survey 2015 (FID 25) & (FID226)

FID 25 Conclusion:

The site itself has scattered planted broadleaved trees, ephemeral grassland, dense scrub and tall ruderal vegetation which are connected to a series of other hedgerows and habitats, which form an important potentially biodiverse mosaic. Therefore, the site is considered to be of at least district importance in terms of its loss within the wider countryside.

The following surveys/ actions are therefore recommended prior to any potential

Biddulph

BD076 & BD076a Land West of Biddulph Bypass

development works being carried out:

- Reptile survey
- Vegetation removal at the appropriate time of year

FID 226 Conclusion:

The site is connected to a hedgerow and other potentially biodiverse habitats, and forms part of an important potentially biodiverse mosaic, therefore the site is attributed district importance.

The following surveys/ actions are therefore recommended prior to any potential development works being carried out:

- Reptile survey
- Vegetation removal at the appropriate time of year

Local Wildlife Assessment (ECUS, 2016)

BD076 - The site has medium ecological value in its potential to support protected species. The site habitats are considered to be of nature conservation value at local and site level. However, more information is required regarding the species rich hedgerow and the presence/absence of reptiles on the site.

The following surveys/ actions are therefore recommended in order to establish SBI/ BAS status:

- A hedgerow survey to be carried out using modified HEGS methodology.
- Reptile survey required.

BD076a - The site has some ecological value in its potential to support protected species. The site habitats are considered to be of nature conservation value at local level only. However, further investigation of the presence/absence of reptiles on the site is needed.

The following surveys/ actions are therefore recommended in order to establish SBI/ BAS status:

- Reptile survey required.

Sustainability Appraisal

Sustainability Appraisal Submission Version June 2018

BD076a

The development of new employment premises should have a significant positive effect upon the vitality and viability of the District, strengthen economic growth and support a higher level of employment within the District. Similarly, the site is located within settlement boundary and should have good access to services and facilities which will also have a significant positive effect. However, the site has been assessed as having district ecological importance which will have a negative effect. The site is indicated on the predictive map of Best and Most Versatile agricultural land as within an area where less than 20% of the land is likely to be BMV.

BD076a is the northern-most of the sites enclosed by the dismantled railway and the A527. The site comprises previously developed land, including an existing depot, on the western edge of Biddulph. The site was taken forward with BD076 as a preferred option (employment / retail) for consultation in April 2016.

The Extended Phase 1 Habitat Surveys and Local Wildlife Site Assessment (May 2017) considered that the site has some ecological value in its potential to support

Biddulph

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protected species. The site habitats are considered to be of nature conservation value at local level only. However, further investigation of the presence or absence of reptiles on the site is needed.

There are no designated heritage assets within the 400m buffer. The site is included within an area constituting potentially biodiverse habitat mosaic with good connectivity and making a valuable contribution to the Biddulph Corridor as set out in the District's Strategic Green Infrastructure Network. Coal outcrops are probable. Contamination issues are possible as this site is believed to be located above an historic landfill site.

The site was considered by the Council's Landscape, Local Green Space and Heritage Impact Study (August 2016) to be of low landscape sensitivity. The study found that existing development within the north of the site is generally screened by the vegetation that encloses it. However, views from Colliers Way are available. In addition, limited views are available through gaps in vegetation on Wharf Road and the Biddulph Valley Way. The study considered that re-development of the site could improve local landscape character.

A comprehensive masterplan should be prepared for the wider area of potential allocation that the site contributes to, to take account of its ecological value, the need to maintain linear habitat connectivity, demonstrating how development is contributing to the priorities and actions proposed for the Biddulph corridor (as set out in the Green Infrastructure Strategy) including providing access to the Biddulph Valley Way; the masterplan should also include landscape impact mitigation measures and a response to the presence of any shallow mine workings.

The site was proposed for inclusion with BD076 as an employment / retail allocation in the July 2017 preferred option Local Plan.

BD076

The proposed delivery of a town centre employment site is considered to have a significant positive effect. Similarly, the site's accessibility to services, facilities and areas of existing employment is likely to have a positive effect. There are no designated heritage assets within the 400m buffer. The site is indicated on the predictive map of Best and Most Versatile agricultural land as within an area where less than 20% of the land is likely to be BMV.

BD076 is within the north of the land enclosed by the dismantled railway and the A527. The site comprises the northern sections of two fields, the remainder of which are located in site BD071 and BD071a to the south. The site is enclosed by the dismantled railway (Biddulph Valley Way) to the west and previously developed land (BD076a) to the north. The site is allocated for retail / employment use in the Biddulph Town Centre Area Action Plan.

This site was taken forward with BD076A as a preferred option (employment / retail) for consultation in April 2016.

The site has a culverted watercourse flowing beneath it which should be re-naturalised through redevelopment. It may be possible to divert the channel round the edge of the site to maximise developable space. The site is included within an area constituting potentially biodiverse habitat mosaic with good connectivity and making a valuable contribution to the Biddulph Corridor as set out in the District's Strategic Green Infrastructure Network. Coal outcrops are probable.

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The Extended Phase 1 Habitat Surveys and Local Wildlife Site Assessment (May 2017) considered that the site has medium ecological value in its potential to support protected species. The site habitats are considered to be of nature conservation value at local and site level. However, more information is required regarding the species rich hedgerow and the presence/absence of reptiles on the site.

The site was considered by the Council's Landscape, Local Green Space and Heritage Impact Study (August 2016) to be of medium landscape sensitivity. The study found that land within the site slopes up to a ridge with an approximate north – south orientation in the centre of the site. Development on the ridge within the site could be visually prominent, particularly from the countryside to the west of Biddulph. Site-specific landscape mitigation measures could include additional advanced planting on the ridge and western boundary.

A comprehensive masterplan should be prepared for the wider area of potential allocation that the site contributes to, to take account of its ecological value, the need to maintain linear habitat connectivity, including to re-naturalise the water course, demonstrating how development is contributing to the priorities and actions proposed for the Biddulph corridor (as set out in the Green Infrastructure Strategy) including providing access to the Biddulph Valley Way; the masterplan should also address landscape impact mitigation measures and include a response to the presence of any shallow mine workings.

The site was proposed for inclusion with BD076A as an employment / retail allocation in the July 2017 preferred option Local Plan.

Initial HRA Screening

No Likely Significant Effects (LSEs) have been identified in relation to the preferred option site allocations in Biddulph.

Minerals

No implications.

Retail Study 2013

- Recommends allocation of site to accommodate a discount foodstore to claw back some of the 45% of residents who still shop out of town for their main food shopping (qualitative need only – no quantitative need). Study identifies outflow to mainstream and discount foodstores. A discount store would provide the local population with more choice as due to closures of other stores Sainsburys is the only mainstream foodstore in the town. This approach would be unlikely to have a detrimental impact on Sainsburys which is currently trading above average.
- Any new store would have to be sustainably located so that linked trips to the town centre can still be achieved. The only site option would be west of the bypass (this is also raised as a potential site for a mixed use development by the consultants). It would need to be accessed and accommodated alongside housing so careful planning would be required to achieve this. A standard sized store of around 1,000m² (net sales) is recommended.
- Comparison goods – substantially lower capacity than identified in 2006. Although there is a (lower) quantitative and qualitative need for new comparison retail floor space it is recommended that the AAP allocation is reviewed because:

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1. The town centre market share for comparison goods has increased significantly – the offer has increased / improved with Sainsburys, B & M and Home Bargains;
 2. The economic and commercial environment has changed since 2006 with comparison retailers generally looking to rationalize their stores and concentrate on larger catchment areas – clearly, Biddulph is in close proximity to Stoke on Trent;
 3. The fact that the allocation was not implemented is an indication that there is not market demand for this level of development.
- There is no requirement for the Council to proactively identify any alternative sites for new comparison retail development over the early to mid-phases of the emerging Local Plan. A future update to this study should define quantitative need for the latter phase of the plan (post 2018).

Landscape, Local Green Space & Heritage Impact Study (August 2016)

BD076 Landscape Results:

Within the north of the land enclosed by the dismantled railway and the A527. The site comprises the northern sections of two fields, the remainder of which are located in site BD071 & BD071a to the south. The site is enclosed by the dismantled railway to the west and previously developed land (BD076a) to the north. Land within the site slopes up to a ridge with an approximate north south orientation in the centre of the site. The site is not immediately adjacent to existing settlement edge (separated by BD076a) and therefore should not be developed in isolation. Development on the ridge within the site could be visually prominent, particularly from the countryside to the west of Biddulph. If the site were to be developed consideration could be given to phased development, which would allow advanced planting to be undertaken on the western site boundary and the hedgerows in the centre of the site (located on the ridge) to grow, providing increased screening of development. **Site is of medium landscape sensitivity. Site-specific landscape mitigation measures could include additional advanced planting on the ridge and western boundary.**

BD076 Heritage Results:

There are no designated heritage assets within the 400m buffer. Development in the site would change a small element of the HLC zone BBHECZ 3, although for the most part, it would remain unaltered (Historic Environment Character Assessment 2010).

Site suitable for development in heritage terms.

BD076a Landscape Results:

The northern-most of the sites enclosed by the dismantled railway and the A527. Site comprises previously developed land, including an existing depot, on the western edge of Biddulph. The existing development within the north of the site is generally screened by the vegetation that encloses it. However, views from Colliers Way are available. In addition, limited views are available through gaps in vegetation on Wharf Road and the dismantled railway. Re-development of the site could improve local landscape character. The site is located within the current settlement form, enclosed by the disused railway which forms a strong edge to the settlement.

Site is of low landscape sensitivity.

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BD076a Heritage Results:

There are no designated heritage assets within the 400m buffer. Development in the site would change a small element of the HLC zone BBHECZ 3, although for the most part, it would remain unaltered (Historic Environment Character Assessment 2010).

Site suitable for development in heritage terms.

Options Consultation July 2015

BD076a

Statutory bodies/stakeholders

SCC Highways - Acceptable subject to access design and transport assessment.

*Note - this is intended to be a large development scheme also incorporating sites BD106, BD156, BD055, BD108. Access is intended from one of the roundabouts adjacent to the Meadows School (south) and from the road currently used to serve the telephone exchange (north).

Developer/Agent/Owner - Land available

Public response - 10 comments – 6 supports, 4 objections.

Issues raised:

Support

- Infrastructure - Schools
- Infrastructure - Traffic / Transport -
- Infrastructure - Other - good access to local amenities
- Landscape - improve derelict land,
- Amenity (e.g. noise, privacy, loss of light)
- Government Policy - is not in the Green Belt
- Other - site would be suitable for residential development, would act as infill development

Objections

- Infrastructure - Traffic / Transport - would create too much traffic, bypass would become dangerous.
- Landscape - ruin the character of the town
- Amenity (e.g. noise, privacy, loss of light) - Detrimental impact on residential amenity.
- Scale of development - over-development of the town.
- Government Policy - Land is Green Belt and beyond the defensible boundary of the settlement, conflicts with Core Strategy Policy SO9 and C1.
- Other - Should be used for housing as if it is used for retail it will be the final nail in the coffin for the High Street, Consultation form is not straightforward to complete and requirement to complete one for each site is too onerous.

Council response –

- The Highway Authority does not raise any difficulties which would prevent the development of this site.

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- Part of the land is identified as being important to the setting of the settlement in the Council's Landscape & Settlement Character Assessment. A Landscape & Visual Impact Assessment will be undertaken during the plan production process and look at all preferred option sites suggesting mitigation measures where appropriate. The results will be incorporated into the next version of the Local Plan. (Note – this work has now been undertaken).
- Amenity – issues such as overlooking will be assessed in detail once a site layout has been determined at the time a planning application is received and residents will have the opportunity to comment on the content of that application.
- It is not considered that development of this particular site would be out of proportion with the rest of the town.
- The land in question is not Green Belt.
- The Council's Retail Study recommends that a sequentially preferable site for a discount food retail store is allocated in Biddulph. This is intended to complement the existing retail offer in the town and attract existing residents who currently go out of town for their discount food shopping. As this site is allocated for retail use in the Biddulph Town Centre Area Action Plan and is the only suitable site for this use within and around the town centre it is proposed for allocation.

BD076

Statutory bodies/stakeholders

SCC Highways - Acceptable subject to access design and Transport Assessment.

*Note - this is intended to be a large development scheme also incorporating sites BD106, BD156, BD055, BD108. Access is intended from one of the roundabouts adjacent to the Meadows School (south) and from the road currently used to serve the telephone exchange (north).

Environment Agency – The site has a culverted watercourse flowing beneath it which should be renaturalised through redevelopment to contribute towards WFD objectives. This may take up space within the site, however it may be possible to divert the channel round the edge to create more developable space.

Developer/Agent/Owner

Object to the site being identified for employment. Question issue of need in this specific location as the AAP allocation was not implemented. It is unclear as to whether this site contributes to the 2 hectare employment requirement stated or how it relates to the evidence base. Not considered to be viable for employment use - constraints (e.g. flood risk, levels and ground conditions and also vehicular access would be through third party land). Residential development of this site presents the opportunity to develop an integrated scheme and share remediation and infrastructure costs ensuring a viable scheme. This would also mean that less housing would be required in the Green Belt. Employment needs would be best met on BD117.

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Public response

Issues raised:

Objections

- Infrastructure - Traffic / Transport - would create too much traffic, bypass would become dangerous.
- Landscape - ruin the character of the town
- Amenity (e.g. noise, privacy, loss of light) - Detrimental impact on residential amenity.
- Scale of development - over-development of the town.
- Government Policy - Land is Green Belt and beyond the defensible boundary of the settlement, conflicts with Core Strategy Policy SO9 and C1.
- Other - Would be more suited to retail or housing, Consultation form is not straightforward to complete and requirement to complete one for each site is too onerous.

Support

- Infrastructure - Other - ideally situated for access to amenities
- Landscape - Land is derelict and not visually appealing
- Government Policy - land is not Green Belt
- Other - Will help businesses who are looking for land / premises in Biddulph, would be suitable for housing

Council response

- The Highway Authority does not raise any difficulties which would prevent the development of this site.
- The site is allocated for retail / employment use in the Biddulph Town Centre Area Action Plan, a development plan document which remains in force.
- There is demand from existing businesses in the town for premises close to the town centre and this is a suitable site to meet that requirement. Access to the site and the link through to this land is within public ownership.
- Viability testing will take place on sites selected by the Council as preferred options.
- Part of the land is identified as being important to the setting of the settlement in the Council's Landscape & Settlement Character Assessment. A Landscape & Visual Impact Assessment will be undertaken during the plan production process and look at all preferred option sites suggesting mitigation measures where appropriate. The results will be incorporated into the Submission Version of the Local Plan.
- Amenity – issues such as overlooking will be assessed in detail once a site layout has been determined at the time a planning application is received and residents will have the opportunity to comment on the content of that application. Views from individual properties are not protected in planning law.

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- It is not considered that development of this particular site would be out of proportion with the rest of the town.

Preferred Options April 2016

Statutory Bodies / Stakeholders

Staffordshire Wildlife Trust: Objection - BD 076a, covered by FID 226, part of FID 25 and part un-surveyed. District ecological value, biodiverse site. BD 076 covered by FID 25 - district ecological value, biodiverse site. These should be assessed against the Staffordshire LWS criteria.

Council Response

ECUS Ltd conducted Phase 1 ecological survey (incorporating Local Wildlife Site Assessment) in 2016. They concluded that both sites had the potential to support protected species. The site habitats on both sites were considered to be of nature conservation value at local and site level. Further survey work was identified as a requirement for both sites. On site BD076 more information is required regarding the species rich hedgerow and the presence/absence of reptiles on the site in order to establish SBI/ BAS status. On site BD076a further investigation of the presence/absence of reptiles on the site is needed. If these sites are taken forward as allocations, policy wording will require the survey work to be undertaken in order to inform any planning application for development of the sites.

Environment Agency: General comment - The following comments highlight sites where we consider there may be issues relating to contaminated land. BD076a: According to information held by the Environment Agency, these sites are located above historic landfill sites. The local council, as lead regulator for these sites, should be contacted for further information.

Council Response

Comment noted. Prior to any development taking place on the site, investigations would be needed to establish the precise location of any historic landfill sites and mitigation measures required.

Staffordshire County Council: General Comment - The site is adjacent to, or overlaps with a Biodiversity Alert Site. Design and layout should avoid impacts in this site, enhance it where possible, and maintain linear habitat connectivity.

Council Response

Comments noted. A Green Infrastructure Strategy has been prepared by the Council and consultation on its content is taking place alongside the Preferred Options Local Plan consultation.

Biddulph Neighbourhood Plan Working Group: Support inclusion of sites in plan.

Developer/Agent/Owner

My clients would object to a mixed use and employment allocation of 3.5ha in the northern part of Core Strategy Broad Area 4 (BD076 / BD076A). There has been a long standing allocation on that site, and they have marketed it for employment and

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commercial uses for over 10 years without success. Their firm view is that residential development is the only viable use on the site, and as such the entire site should be allocated for residential development in the Local Plan review. That course of action is explicitly supported by the NPPF which states (para. 22) that "Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities." Indeed, the Employment Land Requirements Study states (para. 8.4) that: "Whilst adopted and emerging Local Plan policies may seek to safeguard against the loss of employment land to other uses it is likely that, over the course of the plan period, some land will be lost to alternative use (for example where they are no longer suitable for employment use). In accordance with the Practice Guidance, market signals should be used by the LPAs as a guide to whether losses in certain areas will be appropriate or not." It later (para 8.18) states: "any new provision should ensure that the layout, location and type of space is attractive to the market rather than purely focusing on the quantum of space delivered". Furthermore, it is questioned whether the need actually exists for an employment allocation on this site in Biddulph. The consultation paper refers to an employment land requirement of 35ha in the District (para 3.16) which is in the middle of the range identified in the Employment Land Requirements Study (para 7.108: 25-45ha). However, the Study states: "it is recognised that the labour supply projections which link to the Objectively Assessed Housing Need are towards the lower end of this range. Whilst it has been acknowledged that there is not a direct causal link between housing and employment land requirements, there is nevertheless a need to ensure that the two dovetail together to avoid any unsustainable outcomes". Moreover, in relation to Biddulph specifically the consultation paper identifies a residual employment land requirement of only 1.95ha in Table 3.3, and a need for a 1000m² discount foodstore in Table 3.4, but then proposes the allocation of a total of 10.24ha of employment land in and around the town. Consequently, in relation to Broad Area 4, given the clear lack of market interest in employment or commercial uses on the site, and the over riding need to increase the housing land supply in town as highlighted above, it is contended that these areas in the site should also be allocated for residential development in the Local Plan review as part of the wider site allocation.

Public Response

- 31 no. support
- 2 objections on the grounds of – negative impact on town centre and considered to be unrealistic.
- 11no. general comments

Council Response

This site would be developed as part of a wider regeneration opportunity including land to the south to bring forward a large strategic mixed use regeneration site which is well related to the town centre and its key services and facilities. No particular parts of the site have been earmarked for particular uses at this stage. A masterplan would be required to examine constraints in order to come up with a suitable and viable site layout. It is considered that this development would benefit the local economy as well as meeting a significant portion of the town's housing needs.

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Preferred Options Local Plan July 2017

Statutory bodies/stakeholders (Comments relate to Wharf Road Strategic Development Area as a whole):

Historic England - We note the generic statement within the policy that states that development proposals must comply with the mitigation measures set out in the assessment and we are not unsupportive of this approach, however, it is not always clear what specific mitigation measures are being suggested. We do not support the statement that masterplanning at development management stage is an appropriate mitigation measure where adverse impacts are identified at this stage, as once the Local Plan is adopted the principle of development on these allocations will have been accepted. In these instances we would require further information at the outset to ensure that the development of the site is appropriate and all mitigation measures have been appropriately identified. For example, paragraph 9.37 on page 142 cites that screening would be an appropriate mitigation measure, however, we cannot find the information that states what the impact to the significance of this heritage asset is and whether screening would therefore be an appropriate mitigation measure.

Response

Appropriate mitigation measures from the Heritage Impact Study have been incorporated into the relevant site policy and the evidence base was discussed at the meeting with Historic England.

Environment Agency - Wharf Road – Biddulph: Welcome the intentions of this area (as detailed in paragraph 9.40) to contribute towards Water Framework Directive objectives. Happy to work with Council, Lead Local Flood Authority and developers to address the issues of the site such as the Preliminary Risk Assessment prior to an application being submitted via our Cost Recovery Advice service.

Response

Support noted.

United Utilities – We note the detailed policy DSB1. We recommend that this policy includes further details. Support delivery of development at the site in accordance with a comprehensive masterplan. Strongly encourage this masterplan to be completed prior to the submission of any planning application. In respect of paragraph 9.40, suggest the following extra wording at the end of the paragraph: "Any application submission will also be required to include a holistic site-wide drainage strategy for foul and surface water which considers how the site will be developed in various phases and most likely by various developers over a number of years. The drainage strategy should clearly demonstrate how the drainage in earlier phases of development interact with the wider phases of development and how the approach to foul and surface water drainage takes account of the flows from later phases of development. Given the availability of an on-site watercourse, only foul flows should be connected to the public sewerage system. Surface water should also be managed by sustainable drainage features.

Applicants should note that the site includes large public sewers and building over them will not be permitted. Applicants should engage in early pre-application

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dialogue with the respective water and waste water undertakers. The current waste water undertaker for the area is United Utilities.”

Response

It is considered appropriate to make amendments to paragraph 9.40 to reflect the issues raised.

Natural England - DSB 1 Wharf Road - Acknowledge that our previous comments on this site have been taken on board and that opportunities to make linkages to the wider GI network will be considered. This would include linking to the Biddulph Strategic corridor and Biddulph Valley Way, reduce fragmentation and increase ecological connectivity. De-culverting of the watercourse is also welcome.

Response

Support noted.

Developer/Agent/Owner – No response made at this stage but land is still available for development.

Public Response: 592 comments – 302 support, 281 object and 9 general*.

Main Issues Raised*:

Support:

- Recognises the future needs of Biddulph.
- Housing close to town centre will revitalise shopping centre and boost local trade.
- Development will bring investment and retail opportunities to Biddulph.
- Major housing developments are located within close proximity to local amenities (e.g. schools, doctors surgeries).
- Proximity to town centre will reduce the need to travel in the private car, reducing traffic, parking problems and pollution.
- Development will re-centralise the town centre and complete an area that is currently undeveloped. Historically, development has been focused to the east of the town.
- General feeling that the wishes of Biddulph residents have been listened to.
- Good access to existing transport infrastructure including the bypass.
- Infrastructure could be built to support the new housing development.
- Development would help improve quality and appearance of area, aiding regeneration.
- Limits the use of Green Belt land.
- Although this land is Green Belt, its release from the Green Belt is the less compromising when compared to other Green Belt areas. All brownfield sites in the area have already been selected for housing development.
- Development here will not compromise individuality of surrounding settlements or threaten historic assets.
- Although this land inclines to the west, it will be hidden from the town by mature trees along Biddulph Valley Way as well as by houses proposed on the eastern larger site.
- Development here would have a limited impact on the aesthetics of the area due to the lower elevation of the land.

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- Development of a Green Infrastructure Strategy including strengthening links between town and countryside via Biddulph Valley Way, Biddulph Grange Garden and the Country Parks is welcomed.
- Acknowledgement of surface water discharge problem.

Objection:

- Area to the west of the bypass is an area of outstanding beauty and gives an immediate impression of the town. Development will have an adverse effect on people's first impressions of the town.
- Green Belt land bordering the Biddulph bypass and looking towards Mow Cop and Congleton Edge is a beautiful area. Development here will have an adverse effect on views over the footings of Mow Cop, the rural nature and the beauty and tranquillity of the area.
- Housing overly concentrated in one particular area which will put pressure on the local infrastructure (e.g. wastewater). Should be dispersed more widely such as at Biddulph Moor.
- Housing is disproportionate to the need in Biddulph.
- Biddulph does not require more housing as there are many homes to rent/buy in the area.
- Smaller developments will have less impact on the town.
- Insufficient range of housing sites of different sizes capable of being delivered quickly within the early part of the plan period.
- Development here will result in a loss of the countryside and its wildlife and impact on biodiversity.
- The site falls within the Green Belt, which should only be developed in exceptional circumstances - could set precedent for future building in the Green Belt.
- Development should not cross Biddulph Valley Way - Biddulph Valley Way is the main recreational amenity in the town that should not be lost. Development here will detract from the enjoyment of Biddulph Valley Way, which is used by many walkers, runners and cyclists.
- The area is prone to flooding - Site is frequently waterlogged and a valuable defence in soaking up water, preventing floods further downstream.
- Brownfield land should be developed in the first instance.
- Unnecessary to build on Green Belt when there are alternative sites to develop, including at Victoria Colliery, Childerplay Lane, Meadows School and Biddulph Moor.
- Development will put pressure on local services, including schools, dentists, and GP surgeries which are at capacity.
- Insufficient sewerage infrastructure in place to support development.
- Insufficient road infrastructure to accommodate the new development.
- Development will have an adverse effect on roads, traffic congestion and air pollution, particularly the bypass.
- Site unsuitable for development due to destabilisation of land from mine shafts.
- Consideration should be given for renovation and improvement of existing town centre retail units before building new retail outlets.
- Existing green space is vital for health and well-being.
- Existing housing will be devalued due to their views of the countryside being lost.
- Proposed development is surrounded by less housing. It will therefore receive fewer objections.
- Three public footpaths would be affected by this development.

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- The proposed Green Belt amendments to the east of the town and from the previous consultation have not been included.
- This area was not proposed previously.
- Poor vehicular access.
- It has been suggested that this development would include a fast food outlet. Respondent objects to this.

***Note – these figures and issues raised cover the whole of the Wharf Road Strategic Development Area which is presented as a single site in the Local Plan so are not specific to these sites only.**

Council Response to all Issues Raised:

ISSUE	RESPONSE
Biddulph doesn't need more houses	The Council is required to produce a Local Plan and meet its Objectively Assessed Housing Needs. The plan period is up to 2031 so the Council is looking to meet future development needs. Development in Biddulph contributes to this.
Highways (Wharf Road)	The Council has been in close consultation with the County Highways Department throughout the Local Plan production process. County Highways have not objected to the principle of development on this site. Policy DSB1 (which relates to this site), requires a Transport Assessment in advance of any development taking place.
Education / Health (education, police and sewage only)	The Council has been liaising with the County Council Education Department throughout the Local Plan preparation process. The County considers that a new school is not needed in the town to accommodate new development. The Council also liaises with the relevant clinical commissioning group and no issues relating to lack of health infrastructure to accommodate new development have been raised to date.
Infrastructure – general	National planning guidance states that the Council should assess the quality and capacity of infrastructure to meet forecast demands. An Infrastructure Delivery Plan is being prepared which will identify the infrastructure necessary to support the Local Plan proposals. It builds on the findings of the Development Capacity Study for the Core Strategy. Consultation and work with infrastructure providers including utility companies is ongoing and their feedback will inform the Infrastructure Delivery Plan and the Local Plan.
Green Belt – BDNEW	The Council's Green Belt Review concludes that the site could be considered for release from the Green Belt provided that exceptional circumstances can be demonstrated. The exceptional circumstances relating to this site are that it will assist with bringing forward a large strategic mixed use regeneration site which is well related to the town centre and its key services and facilities. The Council has fully explored options for meeting its development needs without using Green Belt land. Biddulph is unique in that it is the only town in the Staffordshire Moorlands which is surrounded by Green Belt. This was taken into account at the time the Core Strategy was produced when Biddulph's housing proportion was less than the other towns at 20% of the total District housing figure to 2031. This proportion has been carried

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ISSUE	RESPONSE
	through into the Local Plan. Following recent consultation and evidence, the Council has reduced the amount of Green Belt land identified for development in Biddulph but there is not enough non-green belt land to meet all of the town's future development requirements.
Urban Sprawl – BDNEW	The Green Belt Review states that creation of a new settlement edge along the south-western boundary would prevent urban sprawl over the longer term. This is not explicit in the site policy DSB1 and it is considered appropriate to include this within the policy wording.
Flooding – Wharf Road	The plan policy associated with this site, DSB1, requires a site specific flood risk assessment and early discussions with the Lead Local Flood Authority in advance of any development taking place.
Loss of Wildlife - BDNEW	Policy DSB1 requires that the surveys and actions recommended by the Council's Extended Phase 1 Habitat Survey and Local Wildlife Assessment are implemented as well as provision of a landscaping plan. In addition, negative impacts should be avoided on the nearby Biodiversity Alert Site.
Use Green Belt land at Childerplay	Due to its Green Belt status, land at Childerplay has been considered in the Green Belt Review and it was concluded that it is not appropriate to release from the Green Belt. National planning policy requires the Council to minimise new development in the Green Belt and exceptional circumstances to justify release of land from the Green Belt must exist.
Need green space for health and well-being	The land is in private ownership and most is not publicly accessible. There are public footpaths across BDNEW – see response below.
Public Footpath – BDNEW	Public footpaths may be retained or redirected depending on the site layout which will be determined as part of the comprehensive masterplan. This would be finalised at the planning application stage.
Other sites / brownfield sites in Biddulph (general)	Other sites have been considered as part of the previous consultation prior to this area being selected for development. Other sites have been investigated and allocations are proposed in the plan where appropriate but there is not enough land on brownfield sites to meet Biddulph's housing needs to 2031.
Rear of Chells next to bypass	The fields bordering the bypass behind Chells Builders merchants are not available for development.
Air Quality (Wharf Road)	If the Council considered that a development may adversely impact on local air quality then the applicant is required to undertake air quality assessments to identify these issues and develop options to mitigate these impacts. In addition the Council continually monitors air quality across the District and regularly undertakes review and assessments of this data to identify areas where the traffic could have an unacceptable impact on local air quality. Policy SD4 covers controls of all forms of pollution arising from development. In addition, Policy DSB1 requires positioning of housing away from the immediate edge of the bypass to prevent noise and air quality

Biddulph
BD076 & BD076a Land West of Biddulph Bypass

ISSUE	RESPONSE
	issues.
Landscaping (Wharf Road)	The accompanying site policy (DSB1) requires a comprehensive masterplan to include provision of a landscaping plan to address recommendations set out in the Council's Landscape Study. These include additional planting on the ridge and along the boundary with the Biddulph Valley Way and screening in the south-eastern part of the site. In addition, landscaping will be used as a buffer between the residential and employment / retail development.
Wharf Road – non-Green Belt	The vast majority of the Wharf Road site (with the exception of land to the west of Biddulph Valley Way) is not in the Green Belt and falls within the existing town boundary.
Open Space	An open space study is currently underway and once the results are known the Local Plan maps will be updated accordingly.
Disagree with development on west side of BVW	Development exists on the west side of the Biddulph Valley Way elsewhere in the town.
Pennine Way	Rear of Pennine Way was considered at an earlier stage in the process but dismissed due to it not being considered suitable for release from the Green Belt in the Council's Green Belt Review.
Mining – Wharf Road	The relevant site policy (Policy DSB1), requires comprehensive masterplanning of this area to include detailed investigation work in relation to the mining legacy of the site before development can commence. The mine entries on the site will not be developed over even when treated in line with Coal Authority advice.
BVW – used for recreation	The Biddulph Valley Way would remain in situ so recreational use could continue.
Density	The housing numbers provided in the plan at this stage are an indicator of the number of dwellings which could be provided on the site. They assume a varied density (between 30 and 40 dwellings per hectare) taking into account known constraints. The actual number of houses which could be accommodated on the site will be determined at the planning application stage and be informed by a masterplan which will assess all the constraints in full detail.
House types	House types will be mixed and reflect market demand.
Victoria Colliery v BDNEW	The old Victoria Colliery site is also in the Green Belt and its brownfield status is debateable in its current state. It has been assessed as part of the Green Belt Review and considered suitable for release if exceptional circumstances can be demonstrated. This is the same position as BDNEW. However, it is considered that exceptional circumstances exist for the release of BDNEW, namely that this site will assist with bringing forward a large strategic mixed use regeneration site which is well related to the town centre and its key services and facilities. In comparison, it is considered difficult to justify the release of (part of) the Victoria Colliery site from the Green

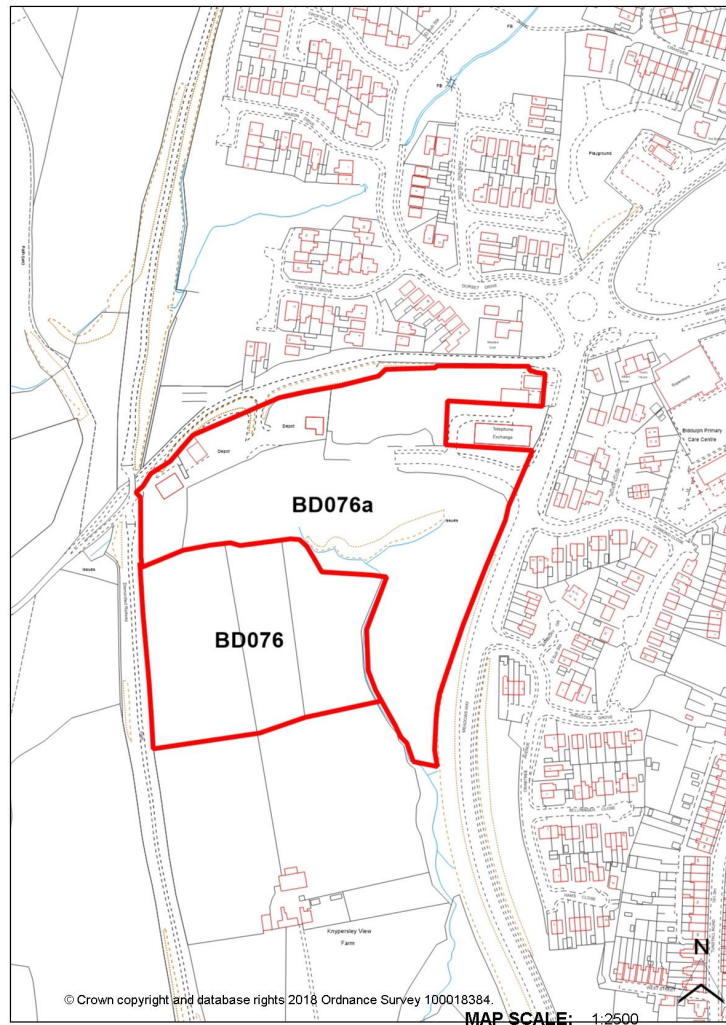
Biddulph
BD076 & BD076a Land West of Biddulph Bypass

ISSUE	RESPONSE
	Belt. In reaching a decision on what sites to include in the Local Plan, the Council must balance evidence and Government policy.
Sequential Test	As part of any planning application, an applicant would have to demonstrate that there were no suitable sites within or on the edge of the town centre for a new foodstore before an approval could be granted on that site. This is known as the 'sequential test' and is part of Government planning policy.
Biddulph Moor instead	Biddulph Moor is surrounded by Green Belt and the Local Plan strategy is to focus the highest proportion of development in the towns.
Station Road	Land at Station Road is too small for an allocation but could come forward at any time through the planning applications process as it is in the town boundary.
Spread Development	Biddulph is surrounded by Green Belt so spreading development around would still result in some Green Belt development.
GI Strategy	The policy also requires that the priorities and actions identified in the Council's Green Infrastructure Strategy are incorporated into a development scheme.
BDNEW added at last minute	The Local Plan production process by its very nature is an evolving process. Drafts of the plan are produced, consultation is undertaken and changes are made to the plan throughout the process. BDNEW was suggested for consideration as part of the Preferred Sites and Boundaries Consultation. It was included at Preferred Options Stage and consultation has taken place, the results of which will be considered by the Council.
Negative impact on surrounding amenities	Amenity issues will be carefully considered at the planning application stage.
Development will lead to increased noise	Potential noise levels from new development will be assessed at the time a planning application is being considered in accordance with the latest noise guidance available at that time which currently states that noise is a material consideration in the planning process and a key aspect of sustainable development.
Empty Properties already exist	Empty properties are already taken into account when calculating housing need figures.
Property Values	Property values are not material in planning law.
Affordable Housing	Policy H3 of the Local Plan requires a target of 33% affordable housing on the site. The types of affordable housing will meet demand in the area in order to help address existing affordability issues.
Density levels	Assumed densities for this area are relatively low at 30-35 dwellings per hectare. Actual density levels will be determined through a masterplan process once all the constraints can be assessed in full detail.
Heritage Impact	A Heritage Impact Assessment of the whole area has been undertaken and it has been deemed suitable for development in heritage terms.

Biddulph
BD076 & BD076a Land West of Biddulph Bypass

Local Plan Publication (Submission Version February 2018)

Refer to Staffordshire Moorlands Local Plan (Submission Version) Consultation Analysis Report May 2018.



Picture 9.5

BD104

Biddulph

BD104 Land between Tunstall Road and Meadows Way

Local Plan Process

- Site suggestion from the SHLAA
- Not included in consultation to date as it was understood that land was not available for development. This position has changed and the land is now available.
- Included in Preferred Options Local Plan July 2017 as part of 'Wharf Road Strategic Development Area'.
- Included in Submission Version Local Plan (February 2018) as part of 'Wharf Road Strategic Development Area'.

Current Position

Site taken forward into Submission Version Local Plan:

- Site within the built up area boundary.
- Opportunity to intensify use in this town centre location.
- Owner interested in redevelopment of site.
- Site to be developed as part of a wider regeneration opportunity including land to the west side of the bypass to bring forward a large strategic mixed use regeneration site which is well related to the town centre and its key services and facilities.

Key Issues

- Located in the town centre.
- Owner interested in redevelopment of site.
- Site has no significant ecological interest.
- Site is of low landscape sensitivity.
- Site is suitable for development in heritage terms.

Site Information

Greenfield/ brownfield	Built up area boundary/ countryside	Est. housing capacit y	Area (ha)	Ownership status	Site details
Greenfield	Within settlement boundary, close to town centre	12 at 40dph (gross)	0.3 (gross)	Owner willing to develop	• Field adjacent to bypass formerly used by James Bateman Junior High School

Studies

Local Plan and Site Allocations Viability Study (May 2018)

The results of the viability testing for Wharf Road (DSB1) shows that the development of this site could support 20% affordable housing provision with surplus of £50 per sq.m. This level of surplus would also be sufficient to support the cost of education contributions and requirements to achieve M4 (2). At 33% affordable provision Wharf Road generates a zero surplus. These results indicate that this development would not be sufficiently financially viable to support 33% affordable housing together with contributions to education and requirements for M4 (2).

Local Plan Housing Trajectory

Biddulph

BD104 Land between Tunstall Road and Meadows Way

The site is in the housing trajectory (included within DSB1) to begin within five years and complete by the end of the plan period (2020/21 - 2031).

Accelerated Housing Delivery Programme

The Council is taking a pro-active approach to delivery of housing in the District through its accelerated housing delivery programme (agreed at Cabinet on 24th April 2018).

Masterplanning work is being undertaken on key sites including the Wharf Road Strategic Development Area (as stated in Policy DSB1) with the aim of bringing together landowner aspirations and assessing site constraints to produce options for site layouts, valuations and delivery plans in order to help bring the sites to fruition.

Extended Phase 1 Habitat Survey (September 2017)

The habitats on site are considered to be of nature conservation value at the site level, apart from scrub (local importance) and are not listed as important habitats in the Staffordshire SBI guidelines.

Species recorded on site are common in the local area and it is considered unlikely that the site supports any notable or protected species. However, animals are mobile and may move into new areas so a precautionary approach should be taken if any work is undertaken on the site.

Most of site habitats are common throughout the region and not considered eligible for BAS / SBI status.

Landscape, Local Green Space & Heritage Impact Study – Assessment of Additional Sites (October 2017)

Landscape Results

Site comprises a sloping, triangular field bound on two sides by Meadows Way and Tunstall Road. The roundabout at the junction of these two roads is located immediately south of the site. The site is generally enclosed by vegetation, reducing its visual prominence. The adjacent settlement edge to the north is formed by Beehive Farm, and is not well defined. Development within the site (particularly in combination with development of the land to the north, surrounding Beehive Farm) could strengthen the settlement edge.

Site is of low landscape sensitivity.

Heritage Results

There are seven Grade II Listed Buildings within the 400m buffer. Vegetation along the southern boundary of the site screens views of the church tower from the site. Due to the large road junction and intervening buildings, development would be unlikely to cause high adverse effects to the settings of the designated assets. Development in the site would change a small element of the HLC zone BBHECZ 3, although for the most part, it would remain unaltered (Historic Environment Character Assessment 2010).

Site suitable for development in heritage terms.

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Sustainability Appraisal

Sustainability Appraisal Submission Version June 2018

The site should deliver a quantum of housing, circa 10 dwellings which is likely to have a significant positive effect, as could the location of the site with regard to its proximity to services and facilities and areas of existing employment as well as the positive effect on the landscape. The site is located within the settlement boundary and has good accessibility to health care services and facilities. However, its proximity to heritage assets would have a negative effect. This is an elevated site in a prominent location immediately adjacent to a roundabout and between the bypass and Tunstall Road. Mainly grass with some trees. The site is within 400m of seven grade II listed assets. Ecological and heritage impact assessments are required. The site was proposed for inclusion in the July 2017 preferred option Local Plan as part of the Wharf Road site (Broad Area 4).

The SMDC (Additional Sites) Local Wildlife Site Assessments (November 2017) considered that most of the site habitats are common throughout the region and not considered eligible for BAS / SBI status.

The site was considered by the Council's Landscape, Local Green Space and Heritage Impact Study (Assessment of additional sites; October 2017) which notes that there are seven Grade II Listed Buildings within the 400m buffer. Vegetation along the southern boundary of the site screens views of the church tower from the site. Due to the large road junction and intervening buildings, it was considered that development would be unlikely to cause high adverse effects to the settings of the designated assets. The study noted that development in the site would change a small element of the HLC zone BBHECZ 3, although for the most part, it would remain unaltered (Historic Environment Character Assessment 2010).

The site was considered by the Council's Landscape, Local Green Space and Heritage Impact Study (Assessment of additional sites; October 2017) to be of low landscape sensitivity. The site is generally enclosed by vegetation, reducing its visual prominence. The adjacent settlement edge to the north is formed by Beehive Farm, and is not well defined. The report considered that development within the site (particularly in combination with development of the land to the north, surrounding Beehive Farm) could strengthen the settlement edge.

Initial HRA Screening

No Likely Significant Effects (LSEs) have been identified in relation to sites in Biddulph.

Minerals

No implications.

Options Consultation July 2015

Not included in the consultation at this stage.

Preferred Options Consultation April 2016

Not included in the consultation at this stage.

Biddulph

BD104 Land between Tunstall Road and Meadows Way

Preferred Options Consultation (July 2017)

Statutory bodies/stakeholders (Comments relate to Wharf Road Strategic Development Area as a whole):

Historic England - We note the generic statement within the policy that states that development proposals must comply with the mitigation measures set out in the assessment and we are not unsupportive of this approach, however, it is not always clear what specific mitigation measures are being suggested. We do not support the statement that masterplanning at development management stage is an appropriate mitigation measure where adverse impacts are identified at this stage, as once the Local Plan is adopted the principle of development on these allocations will have been accepted. In these instances we would require further information at the outset to ensure that the development of the site is appropriate and all mitigation measures have been appropriately identified. For example, paragraph 9.37 on page 142 cites that screening would be an appropriate mitigation measure, however, we cannot find the information that states what the impact to the significance of this heritage asset is and whether screening would therefore be an appropriate mitigation measure.

Response

Appropriate mitigation measures from the Heritage Impact Study have been incorporated into the relevant site policy and the evidence base was discussed at the meeting with Historic England.

Environment Agency - Wharf Road – Biddulph: Welcome the intentions of this area (as detailed in paragraph 9.40) to contribute towards Water Framework Directive objectives. Happy to work with Council, Lead Local Flood Authority and developers to address the issues of the site such as the Preliminary Risk Assessment prior to an application being submitted via our Cost Recovery Advice service.

Response

Support noted.

United Utilities – We note the detailed policy DSB1. We recommend that this policy includes further details. Support delivery of development at the site in accordance with a comprehensive masterplan. Strongly encourage this masterplan to be completed prior to the submission of any planning application. In respect of paragraph 9.40, suggest the following extra wording at the end of the paragraph:

“Any application submission will also be required to include a holistic site-wide drainage strategy for foul and surface water which considers how the site will be developed in various phases and most likely by various developers over a number of years. The drainage strategy should clearly demonstrate how the drainage in earlier phases of development interact with the wider phases of development and how the approach to foul and surface water drainage takes account of the flows from later phases of development. Given the availability of an on-site watercourse, only foul flows should be connected to the public sewerage system. Surface water should also be managed by sustainable drainage features.

Applicants should note that the site includes large public sewers and building over them will not be permitted. Applicants should engage in early pre-application

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dialogue with the respective water and waste water undertakers. The current waste water undertaker for the area is United Utilities.”

Response

It is considered appropriate to make amendments to paragraph 9.40 to reflect the issues raised.

Natural England - DSB 1 Wharf Road - Acknowledge that our previous comments on this site have been taken on board and that opportunities to make linkages to the wider GI network will be considered. This would include linking to the Biddulph Strategic corridor and Biddulph Valley Way, reduce fragmentation and increase ecological connectivity. De-culverting of the watercourse is also welcome.

Response

Support noted.

SCC Highways – Access should be gained off Tunstall Road, with no access off the bypass.

Response

Comment noted.

Developer/Agent/Owner – no response to Local Plan consultation but owner confirmed availability of land in 2017.

Public Response: 592 comments – 302 support, 281 object and 9 general*.

Main Issues Raised*:

Support:

- Recognises the future needs of Biddulph.
- Housing close to town centre will revitalise shopping centre and boost local trade.
- Development will bring investment and retail opportunities to Biddulph.
- Major housing developments are located within close proximity to local amenities (e.g. schools, doctors surgeries).
- Proximity to town centre will reduce the need to travel in the private car, reducing traffic, parking problems and pollution.
- Development will re-centralise the town centre and complete an area that is currently undeveloped. Historically, development has been focused to the east of the town.
- General feeling that the wishes of Biddulph residents have been listened to.
- Good access to existing transport infrastructure including the bypass.
- Infrastructure could be built to support the new housing development.
- Development would help improve quality and appearance of area, aiding regeneration.
- Limits the use of Green Belt land.
- Although this land is Green Belt, its release from the Green Belt is the less compromising when compared to other Green Belt areas. All brownfield sites in the area have already been selected for housing development.

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BD104 Land between Tunstall Road and Meadows Way

- Development here will not compromise individuality of surrounding settlements or threaten historic assets.
- Although this land inclines to the west, it will be hidden from the town by mature trees along Biddulph Valley Way as well as by houses proposed on the eastern larger site.
- Development here would have a limited impact on the aesthetics of the area due to the lower elevation of the land.
- Development of a Green Infrastructure Strategy including strengthening links between town and countryside via Biddulph Valley Way, Biddulph Grange Garden and the Country Parks is welcomed.
- Acknowledgement of surface water discharge problem.

Objection:

- Area to the west of the bypass is an area of outstanding beauty and gives an immediate impression of the town. Development will have an adverse effect on people's first impressions of the town.
- Green Belt land bordering the Biddulph bypass and looking towards Mow Cop and Congleton Edge is a beautiful area. Development here will have an adverse effect on views over the footings of Mow Cop, the rural nature and the beauty and tranquillity of the area.
- Housing overly concentrated in one particular area which will put pressure on the local infrastructure (e.g. wastewater). Should be dispersed more widely such as at Biddulph Moor.
- Housing is disproportionate to the need in Biddulph.
- Biddulph does not require more housing as there are many homes to rent/buy in the area.
- Smaller developments will have less impact on the town.
- Insufficient range of housing sites of different sizes capable of being delivered quickly within the early part of the plan period.
- Development here will result in a loss of the countryside and its wildlife and impact on biodiversity.
- The site falls within the Green Belt, which should only be developed in exceptional circumstances - could set precedent for future building in the Green Belt.
- Development should not cross Biddulph Valley Way - Biddulph Valley Way is the main recreational amenity in the town that should not be lost. Development here will detract from the enjoyment of Biddulph Valley Way, which is used by many walkers, runners and cyclists.
- The area is prone to flooding - Site is frequently waterlogged and a valuable defence in soaking up water, preventing floods further downstream.
- Brownfield land should be developed in the first instance.
- Unnecessary to build on Green Belt when there are alternative sites to develop, including at Victoria Colliery, Childerplay Lane, Meadows School and Biddulph Moor.
- Development will put pressure on local services, including schools, dentists, and GP surgeries which are at capacity.
- Insufficient sewerage infrastructure in place to support development.
- Insufficient road infrastructure to accommodate the new development.
- Development will have an adverse effect on roads, traffic congestion and air pollution, particularly the bypass.
- Site unsuitable for development due to destabilisation of land from mine shafts.

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- Consideration should be given for renovation and improvement of existing town centre retail units before building new retail outlets.
- Existing green space is vital for health and well-being.
- Existing housing will be devalued due to their views of the countryside being lost.
- Proposed development is surrounded by less housing. It will therefore receive fewer objections.
- Three public footpaths would be affected by this development.
- The proposed Green Belt amendments to the east of the town and from the previous consultation have not been included.
- This area was not proposed previously.
- Poor vehicular access.
- It has been suggested that this development would include a fast food outlet. Respondent objects to this.

***Note – these figures and issues raised cover the whole of the Wharf Road Strategic Development Area which is presented as a single site in the Local Plan so are not specific to this site only.**

Council Response to all Issues Raised:

ISSUE	RESPONSE
Biddulph doesn't need more houses	The Council is required to produce a Local Plan and meet its Objectively Assessed Housing Needs. The plan period is up to 2031 so the Council is looking to meet future development needs. Development in Biddulph contributes to this.
Highways (Wharf Road)	The Council has been in close consultation with the County Highways Department throughout the Local Plan production process. County Highways have not objected to the principle of development on this site. Policy DSB1 (which relates to this site), requires a Transport Assessment in advance of any development taking place.
Education / Health (education, police and sewage only)	The Council has been liaising with the County Council Education Department throughout the Local Plan preparation process. The County considers that a new school is not needed in the town to accommodate new development. The Council also liaises with the relevant clinical commissioning group and no issues relating to lack of health infrastructure to accommodate new development have been raised to date.
Infrastructure general	– National planning guidance states that the Council should assess the quality and capacity of infrastructure to meet forecast demands. An Infrastructure Delivery Plan is being prepared which will identify the infrastructure necessary to support the Local Plan proposals. It builds on the findings of the Development Capacity Study for the Core Strategy. Consultation and work with infrastructure providers including utility companies is ongoing and their feedback will inform the Infrastructure Delivery Plan and the Local Plan.
Green Belt BDNEW	– The Council's Green Belt Review concludes that the site could be considered for release from the Green Belt provided that exceptional circumstances can be demonstrated. The exceptional circumstances relating to this site are that it will assist with bringing forward a large strategic mixed use regeneration site which is well related to the town centre and

Biddulph

BD104 Land between Tunstall Road and Meadows Way

ISSUE	RESPONSE
	its key services and facilities. The Council has fully explored options for meeting its development needs without using Green Belt land. Biddulph is unique in that it is the only town in the Staffordshire Moorlands which is surrounded by Green Belt. This was taken into account at the time the Core Strategy was produced when Biddulph's housing proportion was less than the other towns at 20% of the total District housing figure to 2031. This proportion has been carried through into the Local Plan. Following recent consultation and evidence, the Council has reduced the amount of Green Belt land identified for development in Biddulph but there is not enough non-green belt land to meet all of the town's future development requirements.
Urban Sprawl – BDNEW	The Green Belt Review states that creation of a new settlement edge along the south-western boundary would prevent urban sprawl over the longer term. This is not explicit in the site policy DSB1 and it is considered appropriate to include this within the policy wording.
Flooding – Wharf Road	The plan policy associated with this site, DSB1, requires a site specific flood risk assessment and early discussions with the Lead Local Flood Authority in advance of any development taking place.
Loss of Wildlife - BDNEW	Policy DSB1 requires that the surveys and actions recommended by the Council's Extended Phase 1 Habitat Survey and Local Wildlife Assessment are implemented as well as provision of a landscaping plan. In addition, negative impacts should be avoided on the nearby Biodiversity Alert Site.
Use Green Belt land at Childerplay	Due to its Green Belt status, land at Childerplay has been considered in the Green Belt Review and it was concluded that it is not appropriate to release from the Green Belt. National planning policy requires the Council to minimise new development in the Green Belt and exceptional circumstances to justify release of land from the Green Belt must exist.
Need green space for health and well-being	The land is in private ownership and most is not publicly accessible. There are public footpaths across BDNEW – see response below.
Public Footpath – BDNEW	Public footpaths may be retained or redirected depending on the site layout which will be determined as part of the comprehensive masterplan. This would be finalised at the planning application stage.
Other sites / brownfield sites in Biddulph (general)	Other sites have been considered as part of the previous consultation prior to this area being selected for development. Other sites have been investigated and allocations are proposed in the plan where appropriate but there is not enough land on brownfield sites to meet Biddulph's housing needs to 2031.
Rear of Chells next to bypass	The fields bordering the bypass behind Chells Builders merchants are not available for development.
Air Quality (Wharf Road)	If the Council considered that a development may adversely impact on local air quality then the applicant is required to undertake air quality assessments to identify these issues and

Biddulph

BD104 Land between Tunstall Road and Meadows Way

ISSUE	RESPONSE
	develop options to mitigate these impacts. In addition the Council continually monitors air quality across the District and regularly undertakes review and assessments of this data to identify areas where the traffic could have an unacceptable impact on local air quality. Policy SD4 covers controls of all forms of pollution arising from development. In addition, Policy DSB1 requires positioning of housing away from the immediate edge of the bypass to prevent noise and air quality issues.
Landscaping (Wharf Road)	The accompanying site policy (DSB1) requires a comprehensive masterplan to include provision of a landscaping plan to address recommendations set out in the Council's Landscape Study. These include additional planting on the ridge and along the boundary with the Biddulph Valley Way and screening in the south-eastern part of the site. In addition, landscaping will be used as a buffer between the residential and employment / retail development.
Wharf Road – non-Green Belt	The vast majority of the Wharf Road site (with the exception of land to the west of Biddulph Valley Way) is not in the Green Belt and falls within the existing town boundary.
Open Space	An open space study is currently underway and once the results are known the Local Plan maps will be updated accordingly.
Disagree with development on west side of BVW	Development exists on the west side of the Biddulph Valley Way elsewhere in the town.
Pennine Way	Rear of Pennine Way was considered at an earlier stage in the process but dismissed due to it not being considered suitable for release from the Green Belt in the Council's Green Belt Review.
Mining – Wharf Road	The relevant site policy (Policy DSB1), requires comprehensive masterplanning of this area to include detailed investigation work in relation to the mining legacy of the site before development can commence. The mine entries on the site will not be developed over even when treated in line with Coal Authority advice.
BVW – used for recreation	The Biddulph Valley Way would remain in situ so recreational use could continue.
Density	The housing numbers provided in the plan at this stage are an indicator of the number of dwellings which could be provided on the site. They assume a varied density (between 30 and 40 dwellings per hectare) taking into account known constraints. The actual number of houses which could be accommodated on the site will be determined at the planning application stage and be informed by a masterplan which will assess all the constraints in full detail.
House types	House types will be mixed and reflect market demand.
Victoria Colliery v BDNEW	The old Victoria Colliery site is also in the Green Belt and its brownfield status is debateable in its current state. It has been

Biddulph

BD104 Land between Tunstall Road and Meadows Way

ISSUE	RESPONSE
	assessed as part of the Green Belt Review and considered suitable for release if exceptional circumstances can be demonstrated. This is the same position as BDNEW. However, it is considered that exceptional circumstances exist for the release of BDNEW, namely that this site will assist with bringing forward a large strategic mixed use regeneration site which is well related to the town centre and its key services and facilities. In comparison, it is considered difficult to justify the release of (part of) the Victoria Colliery site from the Green Belt. In reaching a decision on what sites to include in the Local Plan, the Council must balance evidence and Government policy.
Sequential Test	As part of any planning application, an applicant would have to demonstrate that there were no suitable sites within or on the edge of the town centre for a new foodstore before an approval could be granted on that site. This is known as the 'sequential test' and is part of Government planning policy.
Biddulph Moor instead	Biddulph Moor is surrounded by Green Belt and the Local Plan strategy is to focus the highest proportion of development in the towns.
Station Road	Land at Station Road is too small for an allocation but could come forward at any time through the planning applications process as it is in the town boundary.
Spread Development	Biddulph is surrounded by Green Belt so spreading development around would still result in some Green Belt development.
GI Strategy	The policy also requires that the priorities and actions identified in the Council's Green Infrastructure Strategy are incorporated into a development scheme.
BDNEW added at last minute	The Local Plan production process by its very nature is an evolving process. Drafts of the plan are produced, consultation is undertaken and changes are made to the plan throughout the process. BDNEW was suggested for consideration as part of the Preferred Sites and Boundaries Consultation. It was included at Preferred Options Stage and consultation has taken place, the results of which will be considered by the Council.
Negative impact on surrounding amenities	Amenity issues will be carefully considered at the planning application stage.
Development will lead to increased noise	Potential noise levels from new development will be assessed at the time a planning application is being considered in accordance with the latest noise guidance available at that time which currently states that noise is a material consideration in the planning process and a key aspect of sustainable development.
Empty Properties already exist	Empty properties are already taken into account when calculating housing need figures.
Property Values	Property values are not material in planning law.
Affordable Housing	Policy H3 of the Local Plan requires a target of 33% affordable

Biddulph

BD104 Land between Tunstall Road and Meadows Way

ISSUE	RESPONSE
	housing on the site. The types of affordable housing will meet demand in the area in order to help address existing affordability issues.
Density levels	Assumed densities for this area are relatively low at 30-35 dwellings per hectare. Actual density levels will be determined through a masterplan process once all the constraints can be assessed in full detail.
Heritage Impact	A Heritage Impact Assessment of the whole area has been undertaken and it has been deemed suitable for development in heritage terms.

Local Plan Publication (Submission Version February 2018)

Refer to Staffordshire Moorlands Local Plan (Submission Version) Consultation Analysis Report May 2018.

Biddulph

BD104 Land between Tunstall Road and Meadows Way



Picture 9.6

BD108

Biddulph
BD108 Land at Jacksons Nursery Tunstall Road

Local Plan Process

- Site from the SHLAA
- In the Options Consultation
- In the Preferred Sites and Boundaries consultation April 2016
- Included in Preferred Options Local Plan July 2017 as part of 'Wharf Road Strategic Development Area'.
- Included in Submission Version Local Plan (February 2018) as part of 'Wharf Road Strategic Development Area'.

Current Position

Site taken forward into Submission Version Local Plan due to:

- Within settlement boundary
- Site to be developed as part of a wider regeneration opportunity including land to the west side of the bypass to bring forward a large strategic mixed use regeneration site which is well related to the town centre and its key services and facilities.
- reasons set out below under 'key issues' heading.

Key Issues

- Part of larger mixed use site
- Close to services & facilities
- Owner willing to deliver site
- Ecology – surveys recommended to establish SBI/BAS status.
- Low landscape sensitivity
- Two Listed Buildings within the site and five in close proximity to the site (mostly associated with property known as 'Fairhaven' occupied by Roaches School).
- - Suitable for development in heritage terms subject to appropriate masterplanning. Also, a document explaining how the setting contributes to the significance of the Listed Buildings is required.

Site Information

Greenfield/ brownfield	Built up area boundary/ countryside	Est. housing capacity	Area (ha)	Ownership status	Site details
Brownfield	Within the settlement boundary	12 (28.9dph - gross)	0.44 (gross)	Owner willing to develop	<ul style="list-style-type: none"> • Flat, well screened, secluded site • Scrub land with derelict buildings (former nursery) • Access onto Tunstall Road • Two Listed Buildings within the site and five in close proximity to the site (mostly associated with 'Fairhaven' occupied by the Roaches School).

Biddulph
BD108 Land at Jacksons Nursery Tunstall Road

Studies

Local Plan and Site Allocations Viability Study (May 2018)

The results of the viability testing for Wharf Road (DSB1) shows that the development of this site could support 20% affordable housing provision with surplus of £50 per sq.m. This level of surplus would also be sufficient to support the cost of education contributions and requirements to achieve M4 (2). At 33% affordable provision Wharf Road generates a zero surplus. These results indicate that this development would not be sufficiently financially viable to support 33% affordable housing together with contributions to education and requirements for M4 (2).

Local Plan Housing Trajectory

The site is in the housing trajectory (included within DSB1) to begin within five years and complete by the end of the plan period (2020/21 - 2031).

Accelerated Housing Delivery Programme

The Council is taking a pro-active approach to delivery of housing in the District through its accelerated housing delivery programme (agreed at Cabinet on 24th April 2018).

Masterplanning work is being undertaken on key sites including the Wharf Road Strategic Development Area (as stated in Policy DSB1) with the aim of bringing together landowner aspirations and assessing site constraints to produce options for site layouts, valuations and delivery plans in order to help bring the sites to fruition.

Phase 1 Habitat Survey 2015 (FID 119)

The site has mostly low biodiversity value overall, is set within a fairly urban environment with relatively good connectivity to the wider countryside. Nevertheless, as the site has good connectivity to other more biodiverse habitats, suitable reptile habitat and potential to support roosting bats the site is deemed as having ecological importance. The following surveys/ actions are therefore recommended prior to any potential development works being carried out:

- A bat survey regime to ascertain whether bats roost in the buildings
- Reptile survey
- Vegetation removal at the appropriate time of year

Local Wildlife Assessment (ECUS, 2016)

The site has low ecological value in its potential to support protected species. The site habitats are considered to be of nature conservation value at site level only. However, more information is required regarding the scattered trees on site in order to establish their ecological importance.

The following surveys/ actions are therefore recommended in order to establish SBI/ BAS status:

- Further assessment of the building for its potential to support roosting bats, bat survey possibly required.
- Reptile survey.

Landscape, Local Green Space & Heritage Impact Study (August 2016)

Landscape Results

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The southern-most of the sites enclosed by the dismantled railway and the A527. Site comprises previously developed land within the settlement, west of Tunstall Road and north of Roaches School. The site is set back from the road, and screening is provided by the existing trees and vegetation on the road. Development within the site would not be visually prominent, and (in combination with development of the adjacent sites) could create a stronger settlement edge.

Site is of low landscape sensitivity.

Heritage Results

There are two Grade II Listed Buildings in the site and five additional Grade II Listed Buildings within the 400m buffer. The site is small and development would highly likely cause substantial adverse effects to the settings of the assets in the site. To reduce effects, mitigation should include setting development back from the assets coupled with landscape masterplanning to provide screening. Development would not adversely affect the HLC zone BBHECZ 3 (Historic Environment Character Assessment 2010).

Site suitable for development in heritage terms subject to appropriate master planning.

Comments from Conservation Officer

I think that setting will contribute greatly to the significance of several Listed Buildings as the Coachman's House has a rear frontage (looking into the development site) and much of the site is part of the designed landscape to Fairhaven. The site clearly has potential for redevelopment but I don't think it is as simple as just setting back and screen planting. I would be particularly concerned about the arm of land that extends to the south which appears to be historic screen planting.



Sustainability Appraisal

Sustainability Appraisal Submission Version June 2018

The development of brownfield land indicated on the predictive map of Best and Most Versatile agricultural land as urban / industrial should have a significant positive effect, as should the preservation of the landscape and the site's proximity to services and facilities. However there is scope that development of this site could have significant negative effects on historical assets. Similarly, the site's ecological value would have a negative effect.

The site comprises previously developed land within the settlement, west of Tunstall

Biddulph BD108 Land at Jacksons Nursery Tunstall Road

Road and north of Roaches School and is the southern-most of the sites enclosed by the dismantled railway and the A527. The site was taken forward as a preferred option for consultation in April 2016.

The site is located close to and / or adjoining existing areas of open space and green infrastructure. Suitable enhancements of existing open spaces and / or the provision of links may be required together with appropriate management via contribution to the Council's Green Infrastructure Network.

The Extended Phase 1 Habitat Surveys and Local Wildlife Site Assessment (May 2017) considered that the site has low ecological value in its potential to support protected species. The site habitats are considered to be of nature conservation value at site level only. However, more information is required regarding the scattered trees on site in order to establish their ecological importance.

There are two Grade II Listed Buildings in the site and five additional Grade II Listed Buildings within the 400m buffer. The site was considered by the Council's Landscape, Local Green Space and Heritage Impact Study (August 2016) which notes that the site is small and development would highly likely cause substantial adverse effects to the settings of the assets in the site. To reduce effects, mitigation should include setting development back from the assets coupled with landscape master-planning to provide screening.

The site was considered by the Council's Landscape, Local Green Space and Heritage Impact Study (August 2016) to be of low landscape sensitivity. The study found that the site is set back from the road, with screening provided by the existing trees and vegetation on the road. Development within the site would not be visually prominent, and (in combination with development of the adjacent sites) could create a stronger settlement edge.

The site was proposed for inclusion in the July 2017 preferred option Local Plan as part of the Wharf Road site (Broad Area 4).

Initial HRA Screening

No Likely Significant Effects (LSEs) have been identified in relation to the preferred option site allocations in Biddulph.

Minerals

No implications.

Options Consultation July 2015

Statutory bodies/stakeholders

Historic England: Made no comments on individual sites recommended that a heritage impact assessment of sites is carried out. (This work has now been undertaken). BD055; BD106; BD108; and, BD156 - preferred housing allocations - It is not clear how the impact of the site allocations on the Grade II listed buildings (former Parsonage, school and the Church) and their setting, individually and cumulatively, has been considered. Further information on this is required. (This work has now been undertaken).

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Environment Agency; Site not identified as being in an area likely to be affected by flooding. Need to have regard to the relevant River Basin Management Plan.

Coal Authority: Staffordshire Moorlands is an area where there have been significant coal mining activities which have left a legacy. Recommend that sites are assessed to determine if there coal related hazards which require remediation and the likely impact on mineral resources. Previous coal workings do not prevent development of sites and therefore do not wish to recommend any sites are excluded from assessment on mining legacy grounds.

United Utilities, Severn Trent, Natural England, Network Rail; no site specific comments

SCC Highways - Acceptable in principle subject to access design and Transport Assessment.

*Note - this is intended to be a large development scheme also incorporating sites BD106, BD156, BD055, BD108. Access is intended from one of the roundabouts adjacent to the Meadows School (south) and from the road currently used to serve the telephone exchange (north)

Developer/Agent/Owner – Land available.

Public response 6 comments – all support.

Issues raised:

- Infrastructure - Easy access to schools.
- Infrastructure - Traffic / Transport - A traffic light controlled crossing already exists for pedestrian safety.
- Infrastructure - Other - Ideally situated for easy access to local amenities such as public transport, shopping, health centre etc. a short walk away.
- Government Policy - Site is not in the Green Belt.
- Other - site is a derelict eyesore, infill development which would improve this part of the town.

Council Response – Comments noted

Preferred Options April 2016

Statutory bodies/stakeholders

Natural England: Natural England notes the proposed preferred site for allocation in Biddulph. We note that it is located close to and/or adjoining existing areas of open space and green infrastructure. Suitable enhancements of existing open spaces' may be required together with appropriate management (and funding thereof) in order to allow these open spaces to function effectively during the local plan period. Similarly the development of these preferred sites (if progressed) will need to include suitable multi-functional green infrastructure. Adopted local plan spatial objectives SO8 & 9 refer together with policies such as DC1 Design Considerations, DC3 landscape and settlement setting, and C3 Green Infrastructure.

Council Response

The Council has produced a Draft Green Infrastructure Strategy for consultation alongside the next draft version of the Local Plan. The strategy identifies green infrastructure corridors around the towns and lists particular issues in relation to that

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corridor which can be addressed as part of the relevant site policy and / or at the planning application stage. Similarly, a public open space study is underway covering all designated public open spaces in the Staffordshire Moorlands. One of the areas this will advise on is where improvements are needed to these spaces and new development in the vicinity could contribute towards this. The Council has also designated Local Green Spaces in line with criteria set out in the NPPF and the Council will seek to facilitate improvements to these areas where required.

Developer/Agent/Owner: Support the proposed allocation of land at and adjoining Jacksons Nurseries - Preferred Housing Allocation reference BD108 - along with the adjoining site references BD106, BD156 and BD055, for housing development. Reasons are: Land is previously developed and located within the Biddulph Town Boundary; Land is in a sustainable location within walking distance of the town centre and local bus services whole of Biddulph is within cycling distance; A range of local facilities are within 2km of the site - primary schools, secondary schools, supermarkets, convenience store, GP surgery; Pre-application discussions for this site and a neighbouring site have resulted in positive feedback including site layout (attached); Site has a willing landowner and developer and is technically deliverable; and agree with results of options site assessment document published by the Council during the previous (Site Options Consultation) in regard to Site BD108.

Public Response:

30 object
146 support (including Biddulph Neighbourhood Plan Working Group)

Those who objected did not give any reasons for their objections.

Preferred Options Consultation (July 2017)

Statutory bodies/stakeholders (Comments relate to Wharf Road Strategic Development Area as a whole):

Historic England - We note the generic statement within the policy that states that development proposals must comply with the mitigation measures set out in the assessment and we are not unsupportive of this approach, however, it is not always clear what specific mitigation measures are being suggested. We do not support the statement that masterplanning at development management stage is an appropriate mitigation measure where adverse impacts are identified at this stage, as once the Local Plan is adopted the principle of development on these allocations will have been accepted. In these instances we would require further information at the outset to ensure that the development of the site is appropriate and all mitigation measures have been appropriately identified. For example, paragraph 9.37 on page 142 cites that screening would be an appropriate mitigation measure, however, we cannot find the information that states what the impact to the significance of this heritage asset is and whether screening would therefore be an appropriate mitigation measure.

Response

Appropriate mitigation measures from the Heritage Impact Study have been incorporated into the relevant site policy and the evidence base was discussed at the meeting with Historic England.

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Environment Agency - Wharf Road – Biddulph: Welcome the intentions of this area (as detailed in paragraph 9.40) to contribute towards Water Framework Directive objectives. Happy to work with Council, Lead Local Flood Authority and developers to address the issues of the site such as the Preliminary Risk Assessment prior to an application being submitted via our Cost Recovery Advice service.

Response

Support noted.

United Utilities – We note the detailed policy DSB1. We recommend that this policy includes further details. Support delivery of development at the site in accordance with a comprehensive masterplan. Strongly encourage this masterplan to be completed prior to the submission of any planning application. In respect of paragraph 9.40, suggest the following extra wording at the end of the paragraph:

"Any application submission will also be required to include a holistic site-wide drainage strategy for foul and surface water which considers how the site will be developed in various phases and most likely by various developers over a number of years. The drainage strategy should clearly demonstrate how the drainage in earlier phases of development interact with the wider phases of development and how the approach to foul and surface water drainage takes account of the flows from later phases of development. Given the availability of an on-site watercourse, only foul flows should be connected to the public sewerage system. Surface water should also be managed by sustainable drainage features.

Applicants should note that the site includes large public sewers and building over them will not be permitted. Applicants should engage in early pre-application dialogue with the respective water and waste water undertakers. The current waste water undertaker for the area is United Utilities."

Response

It is considered appropriate to make amendments to paragraph 9.40 to reflect the issues raised.

Natural England - DSB 1 Wharf Road - Acknowledge that our previous comments on this site have been taken on board and that opportunities to make linkages to the wider GI network will be considered. This would include linking to the Biddulph Strategic corridor and Biddulph Valley Way, reduce fragmentation and increase ecological connectivity. De-culverting of the watercourse is also welcome.

Response

Support noted.

Developer/Agent/Owner – Response received supporting the inclusion of the land from landowner's agent.

Public Response:

Public Response: 592 comments – 302 support, 281 object and 9 general*.

Main Issues Raised*:

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Support:

- Recognises the future needs of Biddulph.
- Housing close to town centre will revitalise shopping centre and boost local trade.
- Development will bring investment and retail opportunities to Biddulph.
- Major housing developments are located within close proximity to local amenities (e.g. schools, doctors surgeries).
- Proximity to town centre will reduce the need to travel in the private car, reducing traffic, parking problems and pollution.
- Development will re-centralise the town centre and complete an area that is currently undeveloped. Historically, development has been focused to the east of the town.
- General feeling that the wishes of Biddulph residents have been listened to.
- Good access to existing transport infrastructure including the bypass.
- Infrastructure could be built to support the new housing development.
- Development would help improve quality and appearance of area, aiding regeneration.
- Limits the use of Green Belt land.
- Although this land is Green Belt, its release from the Green Belt is the less compromising when compared to other Green Belt areas. All brownfield sites in the area have already been selected for housing development.
- Development here will not compromise individuality of surrounding settlements or threaten historic assets.
- Although this land inclines to the west, it will be hidden from the town by mature trees along Biddulph Valley Way as well as by houses proposed on the eastern larger site.
- Development here would have a limited impact on the aesthetics of the area due to the lower elevation of the land.
- Development of a Green Infrastructure Strategy including strengthening links between town and countryside via Biddulph Valley Way, Biddulph Grange Garden and the Country Parks is welcomed.
- Acknowledgement of surface water discharge problem.

Objection:

- Area to the west of the bypass is an area of outstanding beauty and gives an immediate impression of the town. Development will have an adverse effect on people's first impressions of the town.
- Green Belt land bordering the Biddulph bypass and looking towards Mow Cop and Congleton Edge is a beautiful area. Development here will have an adverse effect on views over the footings of Mow Cop, the rural nature and the beauty and tranquillity of the area.
- Housing overly concentrated in one particular area which will put pressure on the local infrastructure (e.g. wastewater). Should be dispersed more widely such as at Biddulph Moor.
- Housing is disproportionate to the need in Biddulph.
- Biddulph does not require more housing as there are many homes to rent/buy in the area.
- Smaller developments will have less impact on the town.
- Insufficient range of housing sites of different sizes capable of being delivered quickly within the early part of the plan period.
- Development here will result in a loss of the countryside and its wildlife and impact on biodiversity.

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- The site falls within the Green Belt, which should only be developed in exceptional circumstances - could set precedent for future building in the Green Belt.
- Development should not cross Biddulph Valley Way - Biddulph Valley Way is the main recreational amenity in the town that should not be lost. Development here will detract from the enjoyment of Biddulph Valley Way, which is used by many walkers, runners and cyclists.
- The area is prone to flooding - Site is frequently waterlogged and a valuable defence in soaking up water, preventing floods further downstream.
- Brownfield land should be developed in the first instance.
- Unnecessary to build on Green Belt when there are alternative sites to develop, including at Victoria Colliery, Childerplay Lane, Meadows School and Biddulph Moor.
- Development will put pressure on local services, including schools, dentists, and GP surgeries which are at capacity.
- Insufficient sewerage infrastructure in place to support development.
- Insufficient road infrastructure to accommodate the new development.
- Development will have an adverse effect on roads, traffic congestion and air pollution, particularly the bypass.
- Site unsuitable for development due to destabilisation of land from mine shafts.
- Consideration should be given for renovation and improvement of existing town centre retail units before building new retail outlets.
- Existing green space is vital for health and well-being.
- Existing housing will be devalued due to their views of the countryside being lost.
- Proposed development is surrounded by less housing. It will therefore receive fewer objections.
- Three public footpaths would be affected by this development.
- The proposed Green Belt amendments to the east of the town and from the previous consultation have not been included.
- This area was not proposed previously.
- Poor vehicular access.
- It has been suggested that this development would include a fast food outlet. Respondent objects to this.

***Note – these figures and issues raised cover the whole of the Wharf Road Strategic Development Area which is presented as a single site in the Local Plan so are not specific to this site only.**

Council Response to all Issues Raised:

ISSUE	RESPONSE
Biddulph doesn't need more houses	The Council is required to produce a Local Plan and meet its Objectively Assessed Housing Needs. The plan period is up to 2031 so the Council is looking to meet future development needs. Development in Biddulph contributes to this.
Highways (Wharf Road)	The Council has been in close consultation with the County Highways Department throughout the Local Plan production process. County Highways have not objected to the principle of development on this site. Policy DSB1 (which relates to this site), requires a Transport Assessment in advance of any development taking place.
Education / Health (education, police)	The Council has been liaising with the County Council Education Department throughout the Local Plan preparation

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ISSUE	RESPONSE
and sewage only)	process. The County considers that a new school is not needed in the town to accommodate new development. The Council also liaises with the relevant clinical commissioning group and no issues relating to lack of health infrastructure to accommodate new development have been raised to date.
Infrastructure – general	National planning guidance states that the Council should assess the quality and capacity of infrastructure to meet forecast demands. An Infrastructure Delivery Plan is being prepared which will identify the infrastructure necessary to support the Local Plan proposals. It builds on the findings of the Development Capacity Study for the Core Strategy. Consultation and work with infrastructure providers including utility companies is ongoing and their feedback will inform the Infrastructure Delivery Plan and the Local Plan.
Green Belt – BDNEW	The Council's Green Belt Review concludes that the site could be considered for release from the Green Belt provided that exceptional circumstances can be demonstrated. The exceptional circumstances relating to this site are that it will assist with bringing forward a large strategic mixed use regeneration site which is well related to the town centre and its key services and facilities. The Council has fully explored options for meeting its development needs without using Green Belt land. Biddulph is unique in that it is the only town in the Staffordshire Moorlands which is surrounded by Green Belt. This was taken into account at the time the Core Strategy was produced when Biddulph's housing proportion was less than the other towns at 20% of the total District housing figure to 2031. This proportion has been carried through into the Local Plan. Following recent consultation and evidence, the Council has reduced the amount of Green Belt land identified for development in Biddulph but there is not enough non-green belt land to meet all of the town's future development requirements.
Urban Sprawl – BDNEW	The Green Belt Review states that creation of a new settlement edge along the south-western boundary would prevent urban sprawl over the longer term. This is not explicit in the site policy DSB1 and it is considered appropriate to include this within the policy wording.
Flooding – Wharf Road	The plan policy associated with this site, DSB1, requires a site specific flood risk assessment and early discussions with the Lead Local Flood Authority in advance of any development taking place.
Loss of Wildlife - BDNEW	Policy DSB1 requires that the surveys and actions recommended by the Council's Extended Phase 1 Habitat Survey and Local Wildlife Assessment are implemented as well as provision of a landscaping plan. In addition, negative impacts should be avoided on the nearby Biodiversity Alert Site.
Use Green Belt land at Childerplay	Due to its Green Belt status, land at Childerplay has been considered in the Green Belt Review and it was concluded that it is not appropriate to release from the Green Belt. National planning policy requires the Council to minimise new development in the Green Belt and exceptional circumstances

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ISSUE	RESPONSE
	to justify release of land from the Green Belt must exist.
Need green space for health and well-being	The land is in private ownership and most is not publicly accessible. There are public footpaths across BDNEW – see response below.
Public Footpath – BDNEW	Public footpaths may be retained or redirected depending on the site layout which will be determined as part of the comprehensive masterplan. This would be finalised at the planning application stage.
Other sites / brownfield sites in Biddulph (general)	Other sites have been considered as part of the previous consultation prior to this area being selected for development. Other sites have been investigated and allocations are proposed in the plan where appropriate but there is not enough land on brownfield sites to meet Biddulph's housing needs to 2031.
Rear of Chells next to bypass	The fields bordering the bypass behind Chells Builders merchants are not available for development.
Air Quality (Wharf Road)	If the Council considered that a development may adversely impact on local air quality then the applicant is required to undertake air quality assessments to identify these issues and develop options to mitigate these impacts. In addition the Council continually monitors air quality across the District and regularly undertakes review and assessments of this data to identify areas where the traffic could have an unacceptable impact on local air quality. Policy SD4 covers controls of all forms of pollution arising from development. In addition, Policy DSB1 requires positioning of housing away from the immediate edge of the bypass to prevent noise and air quality issues.
Landscaping (Wharf Road)	The accompanying site policy (DSB1) requires a comprehensive masterplan to include provision of a landscaping plan to address recommendations set out in the Council's Landscape Study. These include additional planting on the ridge and along the boundary with the Biddulph Valley Way and screening in the south-eastern part of the site. In addition, landscaping will be used as a buffer between the residential and employment / retail development.
Wharf Road – non-Green Belt	The vast majority of the Wharf Road site (with the exception of land to the west of Biddulph Valley Way) is not in the Green Belt and falls within the existing town boundary.
Open Space	An open space study is currently underway and once the results are known the Local Plan maps will be updated accordingly.
Disagree with development on west side of BVW	Development exists on the west side of the Biddulph Valley Way elsewhere in the town.
Pennine Way	Rear of Pennine Way was considered at an earlier stage in the process but dismissed due to it not being considered suitable for release from the Green Belt in the Council's Green Belt Review.
Mining – Wharf	The relevant site policy (Policy DSB1), requires

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ISSUE	RESPONSE
Road	comprehensive masterplanning of this area to include detailed investigation work in relation to the mining legacy of the site before development can commence. The mine entries on the site will not be developed over even when treated in line with Coal Authority advice.
BVW – used for recreation	The Biddulph Valley Way would remain in situ so recreational use could continue.
Density	The housing numbers provided in the plan at this stage are an indicator of the number of dwellings which could be provided on the site. They assume a varied density (between 30 and 40 dwellings per hectare) taking into account known constraints. The actual number of houses which could be accommodated on the site will be determined at the planning application stage and be informed by a masterplan which will assess all the constraints in full detail.
House types	House types will be mixed and reflect market demand.
Victoria Colliery v BDNEW	The old Victoria Colliery site is also in the Green Belt and its brownfield status is debateable in its current state. It has been assessed as part of the Green Belt Review and considered suitable for release if exceptional circumstances can be demonstrated. This is the same position as BDNEW. However, it is considered that exceptional circumstances exist for the release of BDNEW, namely that this site will assist with bringing forward a large strategic mixed use regeneration site which is well related to the town centre and its key services and facilities. In comparison, it is considered difficult to justify the release of (part of) the Victoria Colliery site from the Green Belt. In reaching a decision on what sites to include in the Local Plan, the Council must balance evidence and Government policy.
Sequential Test	As part of any planning application, an applicant would have to demonstrate that there were no suitable sites within or on the edge of the town centre for a new foodstore before an approval could be granted on that site. This is known as the 'sequential test' and is part of Government planning policy.
Biddulph Moor instead	Biddulph Moor is surrounded by Green Belt and the Local Plan strategy is to focus the highest proportion of development in the towns.
Station Road	Land at Station Road is too small for an allocation but could come forward at any time through the planning applications process as it is in the town boundary.
Spread Development	Biddulph is surrounded by Green Belt so spreading development around would still result in some Green Belt development.
GI Strategy	The policy also requires that the priorities and actions identified in the Council's Green Infrastructure Strategy are incorporated into a development scheme.
BDNEW added at last minute	The Local Plan production process by its very nature is an evolving process. Drafts of the plan are produced, consultation is undertaken and changes are made to the plan throughout the process. BDNEW was suggested for

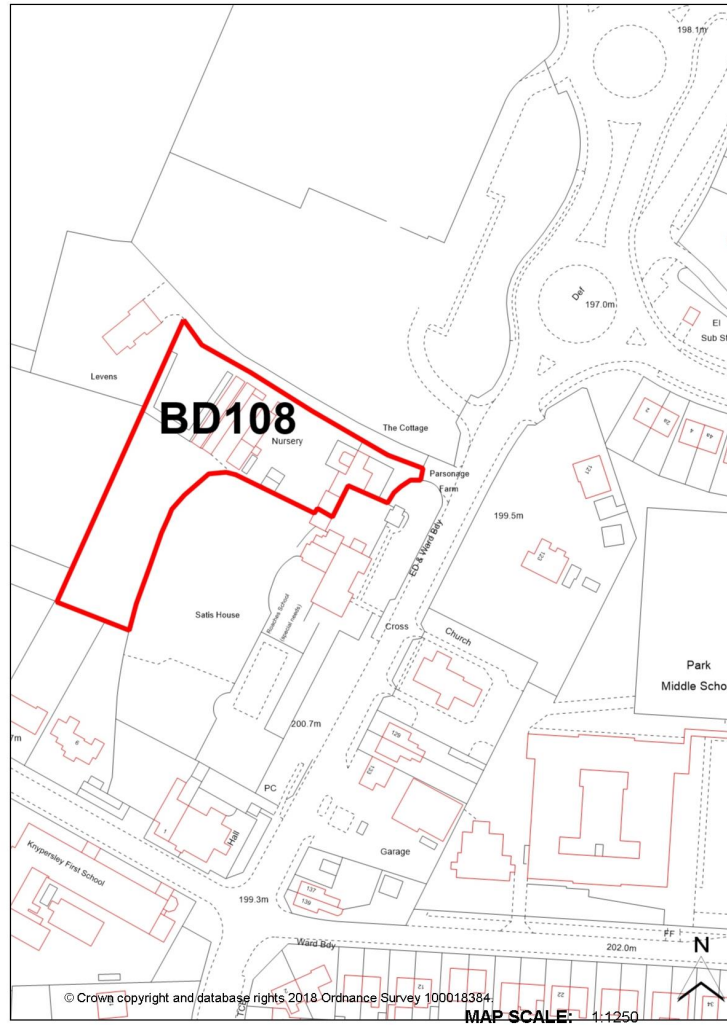
Biddulph
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ISSUE	RESPONSE
	consideration as part of the Preferred Sites and Boundaries Consultation. It was included at Preferred Options Stage and consultation has taken place, the results of which will be considered by the Council.
Negative impact on surrounding amenities	Amenity issues will be carefully considered at the planning application stage.
Development will lead to increased noise	Potential noise levels from new development will be assessed at the time a planning application is being considered in accordance with the latest noise guidance available at that time which currently states that noise is a material consideration in the planning process and a key aspect of sustainable development.
Empty Properties already exist	Empty properties are already taken into account when calculating housing need figures.
Property Values	Property values are not material in planning law.
Affordable Housing	Policy H3 of the Local Plan requires a target of 33% affordable housing on the site. The types of affordable housing will meet demand in the area in order to help address existing affordability issues.
Density levels	Assumed densities for this area are relatively low at 30-35 dwellings per hectare. Actual density levels will be determined through a masterplan process once all the constraints can be assessed in full detail.
Heritage Impact	A Heritage Impact Assessment of the whole area has been undertaken and it has been deemed suitable for development in heritage terms.

Local Plan Publication (Submission Version February 2018)

Refer to Staffordshire Moorlands Local Plan (Submission Version) Consultation Analysis Report May 2018.

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Picture 9.7

BDNEW

Biddulph

BDNEW - West of Biddulph Valley Way / East of Woodside Farm

Local Plan Process

- Suggested at Preferred Options Sites and Boundaries Consultation (2016).
- Included in Preferred Options Local Plan July 2017 as part of 'Wharf Road Strategic Development Area'.
- Included in Submission Version Local Plan (February 2018) as part of 'Wharf Road Strategic Development Area'.

Current Position

Site taken forward into Submission Version Local Plan. Reason:

- The Council's Core Strategy acknowledges that some Green Belt release is necessary to enable sufficient housing growth in Biddulph. This document already allocates the part of the Wharf Road Strategic Development Area not within the Green Belt as a broad location for housing. BDNEW is an expansion of this existing allocation. The Submission Version Local Plan seeks to deliver Biddulph's housing requirement whilst ensuring that Green Belt release is kept to a minimum. Approximately, 255 homes are now planned on land currently designated as Green Belt in Biddulph (part of Wharf Road and Tunstall Road sites) compared to 480 in the 2016 consultation. This has been achieved by amendments to the proposed allocations with consideration given to their respective planning merits.
- BDNEW is proposed to be developed as part of a wider regeneration opportunity including land to the west side of the bypass to bring forward a large strategic mixed use regeneration site which is well related to the town centre and its key services and facilities.
- Considering these factors collectively, it is considered that there are exceptional circumstances to release BDNEW from the Green Belt.

Key Issues

- In the Green Belt – considered to be suitable for removal if exceptional circumstances are demonstrated and appropriate south western boundary treatment takes place.
- Site is of high landscape sensitivity.
- Site is suitable for development in heritage terms.
- A number of surveys/actions are recommended in order to establish SBI/ BAS status.
- Public footpath through centre of site.
- SHLAA record states that some limited areas of SW flooding shown on site. FRA should consider this risk.
- Mining legacy – land previously used for open cast mining (but no mine entries on the site).
- Adjacent to Biddulph Valley Way (BVW) – appropriate links would be required as part of development.
- Access – Currently via bridge across BVW at north of site. Highway Authority advise that for this to be suitable for new housing development, improvements would be needed to this bridge and to whole length of the road up to the bypass roundabout which is likely to be a significant development cost. Preferred alternative is crossing the BVW in a central position to link to development proposed on the other side of BVW. The Highway Authority consider this to be acceptable in principle.

Biddulph

BDNEW - West of Biddulph Valley Way / East of Woodside Farm

- Network Rail sold the freehold to BVW to Staffordshire County Council and do not appear to retain any adjoining land interests.
- County Rights of Way Team have no objections to a road crossing the Biddulph Valley Way provided the route remains open and unrestricted.
- Any constraints which may prevent a road link across the Biddulph Valley Way from going ahead have been investigated – checks have been undertaken with the National Grid and Gas and Electricity suppliers to determine the location of their infrastructure – no issues raised to date which would preclude development.

Site Information

Greenfield/ brownfield	Built up area boundary/ countryside	Est. housing capacity	Density	Area (ha)	Ownership status	Site details
Greenfield	Green Belt	171	35dph (gross)	4.9 (gross)	4 owners – 1 individual owns 1 part and 3 family members own the other part. All have indicated that they would release land. Plus BVW owned by SCC.	<ul style="list-style-type: none"> • Fields • Public footpath through centre of site • Mining legacy • Adjacent to BVW • Unsuitable access across BVW at present to link with larger site to east which would require improvements / alternative solution (see above)

Studies

Local Plan and Site Allocations Viability Study (May 2018)

The results of the viability testing for Wharf Road (DSB1) shows that the development of this site could support 20% affordable housing provision with surplus of £50 per sq.m. This level of surplus would also be sufficient to support the cost of education contributions and requirements to achieve M4 (2). At 33% affordable provision Wharf Road generates a zero surplus. These results indicate that this development would not be sufficiently financially viable to support 33% affordable housing together with contributions to education and requirements for M4 (2).

Local Plan Housing Trajectory

The site is in the housing trajectory (included within DSB1) to begin within five years and complete by the end of the plan period (2020/21 - 2031).

Biddulph

BDNEW - West of Biddulph Valley Way / East of Woodside Farm

Accelerated Housing Delivery Programme

The Council is taking a pro-active approach to delivery of housing in the District through its accelerated housing delivery programme (agreed at Cabinet on 24th April 2018).

Masterplanning work is being undertaken on key sites including the Wharf Road Strategic Development Area (as stated in Policy DSB1) with the aim of bringing together landowner aspirations and assessing site constraints to produce options for site layouts, valuations and delivery plans in order to help bring the sites to fruition.

Green Belt Review (Site 3 – 2017)

“Consider for release under Exceptional Circumstances. Development could be considered without significant damage to the wider Green Belt, although there would be an impact on openness given the location of the land. The site largely sits within low-lying land and is clearly bounded to the north and to the east. The south western boundary is problematic, however, comprising various insubstantial hedgerows as well as being arranged by field pattern and not a clear feature which would constitute a logical and permanent external boundary. This would constitute a new settlement edge which would have to be created, without which there would be a danger of sprawl into open countryside over the longer term”.

Extended Phase 1 Habitat Survey (September 2017)

The site does not currently meet the criteria for SBI / BAS status. The species-rich hedgerow could potentially be of district ecological value, however further surveys are required to establish this. The site also has potential ecological value to support roosting bats. Additionally, the site has potential to support badgers, nesting birds and amphibians. Further surveys are required to establish the status of great crested newts.

The following surveys/ actions are therefore recommended in order to establish SBI/ BAS status:

- Sensitive mowing regime of grassland and leaving rough margins
- Hedgerow planting of native woody species and management during winter
- PSYM pond survey
- Presence / absence survey for great crested newts
- Removal of Himalayan balsam

Landscape & Settlement Character Assessment 2008

Not identified as being important landscape setting to settlement.

Landscape, Local Green Space & Heritage Impact Study – Assessment of Additional Sites (October 2017)

Landscape Results

Large site on western edge of Biddulph comprising agricultural land, enclosed by Wharf Road to the north. The south-western boundary of the site is not well defined, generally formed by fencing and hedgerows on irregular field boundaries. The site is located beyond the dismantled railway, which currently forms a strong, vegetated settlement edge and limit to development. The site is inter-visible with the Green Belt

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to the west. Development within the site would encroach on the surrounding countryside, and would adversely affect the existing settlement edge. Development of the site could potentially compromise the surrounding sensitive countryside, as there would be no clear limit to development beyond the site.

Site is of high landscape sensitivity.

Please note that this study forms part of the wider evidence base to support SMDC's Local Plan. Therefore the conclusions within this report will be weighed against other evidence when determining the overall suitability of a site for development.

Heritage Results

There are six Grade II Listed Buildings within the 400m buffer. The Grade II Listed Mow Cop Castle was visible from the site, located approximately 1.8km west. Due to the intervening buildings and vegetation, development would not adversely impact upon the settings of the assets. From Mow Cop Castle, development in the site would be viewed against a backdrop of existing development and would not impact upon its setting. The HER records the site of a colliery within the site boundary, which may be physically impacted upon by development (PRN 51705). The northern part of the site is set within the HLC zone BBHECZ 2 (Historic Environment Character Assessment 2010). The particular HLC type is least susceptible and development would not alter the character of the zone significantly. The southern part of the site is within the HLC zone BBHECZ 3 (Historic Environment Character Assessment 2010). Development in the site would change an element of the HLC zone BBHECZ 3 (Historic Environment Character Assessment 2010). However, with sensitive design, this could be mitigated.

Site is suitable for development in heritage terms.

Sustainability Appraisal

Sustainability Appraisal Submission Version June 2018

The site's proximity to services, facilities and existing areas of employment and proposed delivery of circa 170 dwellings should have a significant positive effect. However there is scope that development of this site could have negative effects due to the site's potential ecological value, its contribution to the Biddulph Valley Way and impacts on landscape character. The development of greenfield land indicated on the predictive map of Best and Most Versatile agricultural land as within an area where less than 20% of the land is likely to be BMV is assessed as having a negative effect.

The Council's Green Belt review has recommended considering this site for release from the Green Belt if exceptional circumstances can be demonstrated. Landscape and heritage assessments are required.

There are potential mining legacy issues as the land has previously been used for open cast mining. Master planning should be used to demonstrate how a development scheme could contribute to the priorities and actions proposed for the Biddulph strategic GI corridor (as set out in the Green Infrastructure Strategy), including by supporting public access on to the Biddulph Valley Way.

The site was proposed for inclusion in the July 2017 preferred option Local Plan as part of the Wharf Road site (Broad Area 4).

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The SMDC (Additional Sites) Local Wildlife Site Assessments (November 2017) considered that the site does not currently meet the criteria for SBI / BAS status. The species-rich hedgerow could potentially be of some ecological value, however further surveys are required to establish this. The site also has potential to support roosting bats, badgers, nesting birds and amphibians. Further surveys are required to establish the status of great crested newts.

The site was considered by the Council's Landscape, Local Green Space and Heritage Impact Study (Assessment of additional sites; October 2017) which notes that there are six Grade II Listed Buildings within the 400m buffer. The Grade II Listed Mow Cop Castle was visible from the site, located approximately 1.8km west. Due to the intervening buildings and vegetation, it was considered that development would not adversely impact upon the settings of the assets. From Mow Cop Castle, development in the site would be viewed against a backdrop of existing development and would not impact upon its setting. The HER records the site of a colliery within the site boundary, which may be physically impacted upon by development (PRN 51705). The northern part of the site is set within the HLC zone BBHECZ 2 (Historic Environment Character Assessment 2010). The particular HLC type is least susceptible and development would not alter the character of the zone significantly. The southern part of the site is within the HLC zone BBHECZ 3 (Historic Environment Character Assessment 2010). Development in the site would change an element of the HLC zone BBHECZ 3 (Historic Environment Character Assessment 2010). However, with sensitive design, it is considered that this could be mitigated.

The site was considered by the Council's Landscape, Local Green Space and Heritage Impact Study (Assessment of additional sites; October 2017) to be of high landscape sensitivity. The site is located beyond the dismantled railway, which currently forms a strong, vegetated settlement edge and limit to development. The site is inter-visible with the Green Belt to the west. The study considered that development within the site would encroach on the surrounding countryside, and would adversely affect the existing settlement edge. The report noted that development of the site could potentially compromise the surrounding sensitive countryside, as there would be no clear limit to development beyond the site.

Initial HRA Screening

No Likely Significant Effects (LSEs) have been identified in relation to sites in Biddulph.

Minerals

No implications.

Options Consultation July 2015

Not consulted on.

Preferred Options Consultation (April 2016)

Not consulted on.

Suggested as an additional site during consultation period (Petition with 361 signatures supporting a revised version of ADD03, also a District Councillor suggesting the site and the Neighbourhood Plan Working Group asking for it to be investigated as an option).

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Mining

Mining legacy – former open cast mining area. Coal Authority data shows that most of the site is a high risk development area (surface mining) but no mine entries are shown on the site.

Coal Authority (general response – not site specific) “it is important to note that land instability and mining legacy is not always a complete constraint on new development; rather it can be argued that because mining legacy matters have been addressed the new development is safe, stable and sustainable.” (Viability issue – investigative work required by developer).

Biddulph Neighbourhood Plan Working Group

Land available, next to proposed acceptable site, close to town centre, easy access via already proposed site. No neighbouring property. Needs investigation and consultation.

SCC Highways

Current access is via a bridge across Biddulph Valley Way (BVW) at north of site. Highway Authority advise that for this to be suitable for new housing development, improvements would be needed to this bridge and to whole length of the road up to the bypass roundabout which is likely to be a significant development cost. Preferred alternative is crossing the BVW in a central position to link to development proposed on the other side of BVW. The Highway Authority consider this to be acceptable in principle.

SCC Rights of Way

County Rights of Way Team have no objections to a road crossing the Biddulph Valley Way provided the route remains open and unrestricted.

Preferred Options Consultation (July 2017)

Statutory bodies/stakeholders (Comments relate to Wharf Road Strategic Development Area as a whole):

Historic England - We note the generic statement within the policy that states that development proposals must comply with the mitigation measures set out in the assessment and we are not unsupportive of this approach, however, it is not always clear what specific mitigation measures are being suggested. We do not support the statement that masterplanning at development management stage is an appropriate mitigation measure where adverse impacts are identified at this stage, as once the Local Plan is adopted the principle of development on these allocations will have been accepted. In these instances we would require further information at the outset to ensure that the development of the site is appropriate and all mitigation measures have been appropriately identified. For example, paragraph 9.37 on page 142 cites that screening would be an appropriate mitigation measure, however, we cannot find the information that states what the impact to the significance of this heritage asset is and whether screening would therefore be an appropriate mitigation measure.

Response

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Appropriate mitigation measures from the Heritage Impact Study have been incorporated into the relevant site policy and the evidence base was discussed at the meeting with Historic England.

Environment Agency - Wharf Road – Biddulph: Welcome the intentions of this area (as detailed in paragraph 9.40) to contribute towards Water Framework Directive objectives. Happy to work with Council, Lead Local Flood Authority and developers to address the issues of the site such as the Preliminary Risk Assessment prior to an application being submitted via our Cost Recovery Advice service.

Response

Support noted.

United Utilities – We note the detailed policy DSB1. We recommend that this policy includes further details. Support delivery of development at the site in accordance with a comprehensive masterplan. Strongly encourage this masterplan to be completed prior to the submission of any planning application. In respect of paragraph 9.40, suggest the following extra wording at the end of the paragraph: "Any application submission will also be required to include a holistic site-wide drainage strategy for foul and surface water which considers how the site will be developed in various phases and most likely by various developers over a number of years. The drainage strategy should clearly demonstrate how the drainage in earlier phases of development interact with the wider phases of development and how the approach to foul and surface water drainage takes account of the flows from later phases of development. Given the availability of an on-site watercourse, only foul flows should be connected to the public sewerage system. Surface water should also be managed by sustainable drainage features.

Applicants should note that the site includes large public sewers and building over them will not be permitted. Applicants should engage in early pre-application dialogue with the respective water and waste water undertakers. The current waste water undertaker for the area is United Utilities."

Response

It is considered appropriate to make amendments to paragraph 9.40 to reflect the issues raised.

Natural England - DSB 1 Wharf Road - Acknowledge that our previous comments on this site have been taken on board and that opportunities to make linkages to the wider GI network will be considered. This would include linking to the Biddulph Strategic corridor and Biddulph Valley Way, reduce fragmentation and increase ecological connectivity. De-culverting of the watercourse is also welcome.

Response

Support noted.

Developer/Agent/Owner – No comments made in response to Local Plan consultation but landowners have confirmed that land is available for development in 2016.

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Public Response:

Petitions Received

Paper petition (203 signatures) Objection to Local Plan site BDNEW (Part of consultation Local Plan allocation Wharf Road DSB1)

and

Electronic petition (Change.org) 1214 (duly made before deadline). Has subsequently increased to 1257. Objection to Local Plan site BDNEW (Part of consultation Local Plan allocation Wharf Road DSB1)

Plus 592 individual comments – 302 support, 281 object and 9 general*.

Main Issues Raised*:

Support:

- Recognises the future needs of Biddulph.
- Housing close to town centre will revitalise shopping centre and boost local trade.
- Development will bring investment and retail opportunities to Biddulph.
- Major housing developments are located within close proximity to local amenities (e.g. schools, doctors surgeries).
- Proximity to town centre will reduce the need to travel in the private car, reducing traffic, parking problems and pollution.
- Development will re-centralise the town centre and complete an area that is currently undeveloped. Historically, development has been focused to the east of the town.
- General feeling that the wishes of Biddulph residents have been listened to.
- Good access to existing transport infrastructure including the bypass.
- Infrastructure could be built to support the new housing development.
- Development would help improve quality and appearance of area, aiding regeneration.
- Limits the use of Green Belt land.
- Although this land is Green Belt, its release from the Green Belt is the less compromising when compared to other Green Belt areas. All brownfield sites in the area have already been selected for housing development.
- Development here will not compromise individuality of surrounding settlements or threaten historic assets.
- Although this land inclines to the west, it will be hidden from the town by mature trees along Biddulph Valley Way as well as by houses proposed on the eastern larger site.
- Development here would have a limited impact on the aesthetics of the area due to the lower elevation of the land.
- Development of a Green Infrastructure Strategy including strengthening links between town and countryside via Biddulph Valley Way, Biddulph Grange Garden and the Country Parks is welcomed.
- Acknowledgement of surface water discharge problem.

Objection:

- Area to the west of the bypass is an area of outstanding beauty and gives an immediate impression of the town. Development will have an adverse effect on people's first impressions of the town.

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- Green Belt land bordering the Biddulph bypass and looking towards Mow Cop and Congleton Edge is a beautiful area. Development here will have an adverse effect on views over the footings of Mow Cop, the rural nature and the beauty and tranquillity of the area.
- Housing overly concentrated in one particular area which will put pressure on the local infrastructure (e.g. wastewater). Should be dispersed more widely such as at Biddulph Moor.
- Housing is disproportionate to the need in Biddulph.
- Biddulph does not require more housing as there are many homes to rent/buy in the area.
- Smaller developments will have less impact on the town.
- Insufficient range of housing sites of different sizes capable of being delivered quickly within the early part of the plan period.
- Development here will result in a loss of the countryside and its wildlife and impact on biodiversity.
- The site falls within the Green Belt, which should only be developed in exceptional circumstances - could set precedent for future building in the Green Belt.
- Development should not cross Biddulph Valley Way - Biddulph Valley Way is the main recreational amenity in the town that should not be lost. Development here will detract from the enjoyment of Biddulph Valley Way, which is used by many walkers, runners and cyclists.
- The area is prone to flooding - Site is frequently waterlogged and a valuable defence in soaking up water, preventing floods further downstream.
- Brownfield land should be developed in the first instance.
- Unnecessary to build on Green Belt when there are alternative sites to develop, including at Victoria Colliery, Childerplay Lane, Meadows School and Biddulph Moor.
- Development will put pressure on local services, including schools, dentists, and GP surgeries which are at capacity.
- Insufficient sewerage infrastructure in place to support development.
- Insufficient road infrastructure to accommodate the new development.
- Development will have an adverse effect on roads, traffic congestion and air pollution, particularly the bypass.
- Site unsuitable for development due to destabilisation of land from mine shafts.
- Consideration should be given for renovation and improvement of existing town centre retail units before building new retail outlets.
- Existing green space is vital for health and well-being.
- Existing housing will be devalued due to their views of the countryside being lost.
- Proposed development is surrounded by less housing. It will therefore receive fewer objections.
- Three public footpaths would be affected by this development.
- The proposed Green Belt amendments to the east of the town and from the previous consultation have not been included.
- This area was not proposed previously.
- Poor vehicular access.
- It has been suggested that this development would include a fast food outlet. Respondent objects to this.

***Note – these figures and issues raised cover the whole of the Wharf Road Strategic Development Area which is presented as a single site in the Local Plan so are not specific to this site only.**

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Council Response to all Issues Raised:

ISSUE	RESPONSE
Biddulph doesn't need more houses	The Council is required to produce a Local Plan and meet its Objectively Assessed Housing Needs. The plan period is up to 2031 so the Council is looking to meet future development needs. Development in Biddulph contributes to this.
Highways (Wharf Road)	The Council has been in close consultation with the County Highways Department throughout the Local Plan production process. County Highways have not objected to the principle of development on this site. Policy DSB1 (which relates to this site), requires a Transport Assessment in advance of any development taking place.
Education / Health (education, police and sewage only)	The Council has been liaising with the County Council Education Department throughout the Local Plan preparation process. The County considers that a new school is not needed in the town to accommodate new development. The Council also liaises with the relevant clinical commissioning group and no issues relating to lack of health infrastructure to accommodate new development have been raised to date.
Infrastructure – general	National planning guidance states that the Council should assess the quality and capacity of infrastructure to meet forecast demands. An Infrastructure Delivery Plan is being prepared which will identify the infrastructure necessary to support the Local Plan proposals. It builds on the findings of the Development Capacity Study for the Core Strategy. Consultation and work with infrastructure providers including utility companies is ongoing and their feedback will inform the Infrastructure Delivery Plan and the Local Plan.
Green Belt – BDNEW	The Council's Green Belt Review concludes that the site could be considered for release from the Green Belt provided that exceptional circumstances can be demonstrated. The exceptional circumstances relating to this site are that it will assist with bringing forward a large strategic mixed use regeneration site which is well related to the town centre and its key services and facilities. The Council has fully explored options for meeting its development needs without using Green Belt land. Biddulph is unique in that it is the only town in the Staffordshire Moorlands which is surrounded by Green Belt. This was taken into account at the time the Core Strategy was produced when Biddulph's housing proportion was less than the other towns at 20% of the total District housing figure to 2031. This proportion has been carried through into the Local Plan. Following recent consultation and evidence, the Council has reduced the amount of Green Belt land identified for development in Biddulph but there is not enough non-green belt land to meet all of the town's future development requirements.
Urban Sprawl – BDNEW	The Green Belt Review states that creation of a new settlement edge along the south-western boundary would prevent urban sprawl over the longer term. This is not explicit in the site policy DSB1 and it is considered appropriate to include this within the policy wording.

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ISSUE	RESPONSE
Flooding – Wharf Road	The plan policy associated with this site, DSB1, requires a site specific flood risk assessment and early discussions with the Lead Local Flood Authority in advance of any development taking place.
High Landscape Sensitivity BDNEW	This issue will be weighed against other evidence when determining the overall suitability of the site for development.
Loss of Wildlife - BDNEW	Policy DSB1 requires that the surveys and actions recommended by the Council's Extended Phase 1 Habitat Survey and Local Wildlife Assessment are implemented as well as provision of a landscaping plan. In addition, negative impacts should be avoided on the nearby Biodiversity Alert Site.
Use Green Belt land at Childerplay	Due to its Green Belt status, land at Childerplay has been considered in the Green Belt Review and it was concluded that it is not appropriate to release from the Green Belt. National planning policy requires the Council to minimise new development in the Green Belt and exceptional circumstances to justify release of land from the Green Belt must exist.
Need green space for health and well-being	The land is in private ownership and most is not publicly accessible. There are public footpaths across BDNEW – see response below.
Public Footpath – BDNEW	Public footpaths may be retained or redirected depending on the site layout which will be determined as part of the comprehensive masterplan. This would be finalised at the planning application stage.
Other sites / brownfield sites in Biddulph (general)	Other sites have been considered as part of the previous consultation prior to this area being selected for development. Other sites have been investigated and allocations are proposed in the plan where appropriate but there is not enough land on brownfield sites to meet Biddulph's housing needs to 2031.
Rear of Chells next to bypass	The fields bordering the bypass behind Chells Builders merchants are not available for development.
Air Quality (Wharf Road)	If the Council considered that a development may adversely impact on local air quality then the applicant is required to undertake air quality assessments to identify these issues and develop options to mitigate these impacts. In addition the Council continually monitors air quality across the District and regularly undertakes review and assessments of this data to identify areas where the traffic could have an unacceptable impact on local air quality. Policy SD4 covers controls of all forms of pollution arising from development. In addition, Policy DSB1 requires positioning of housing away from the immediate edge of the bypass to prevent noise and air quality issues.
Landscaping (Wharf Road)	The accompanying site policy (DSB1) requires a comprehensive masterplan to include provision of a landscaping plan to address recommendations set out in the Council's Landscape Study. These include additional planting on the ridge and along the boundary with the Biddulph Valley Way and screening in the south-eastern part of the site. In

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ISSUE	RESPONSE
	addition, landscaping will be used as a buffer between the residential and employment / retail development.
Wharf Road – non-Green Belt	The vast majority of the Wharf Road site (with the exception of land to the west of Biddulph Valley Way) is not in the Green Belt and falls within the existing town boundary.
Open Space	An open space study is currently underway and once the results are known the Local Plan maps will be updated accordingly.
Disagree with development on west side of BVW	Development exists on the west side of the Biddulph Valley Way elsewhere in the town.
Pennine Way	Rear of Pennine Way was considered at an earlier stage in the process but dismissed due to it not being considered suitable for release from the Green Belt in the Council's Green Belt Review.
Mining – Wharf Road	The relevant site policy (Policy DSB1), requires comprehensive masterplanning of this area to include detailed investigation work in relation to the mining legacy of the site before development can commence. The mine entries on the site will not be developed over even when treated in line with Coal Authority advice.
BVW – used for recreation	The Biddulph Valley Way would remain in situ so recreational use could continue.
Density	The housing numbers provided in the plan at this stage are an indicator of the number of dwellings which could be provided on the site. They assume a varied density (between 30 and 40 dwellings per hectare) taking into account known constraints. The actual number of houses which could be accommodated on the site will be determined at the planning application stage and be informed by a masterplan which will assess all the constraints in full detail.
House types	House types will be mixed and reflect market demand.
Victoria Colliery v BDNEW	The old Victoria Colliery site is also in the Green Belt and its brownfield status is debateable in its current state. It has been assessed as part of the Green Belt Review and considered suitable for release if exceptional circumstances can be demonstrated. This is the same position as BDNEW. However, it is considered that exceptional circumstances exist for the release of BDNEW, namely that this site will assist with bringing forward a large strategic mixed use regeneration site which is well related to the town centre and its key services and facilities. In comparison, it is considered difficult to justify the release of (part of) the Victoria Colliery site from the Green Belt. In reaching a decision on what sites to include in the Local Plan, the Council must balance evidence and Government policy.
Sequential Test	As part of any planning application, an applicant would have to demonstrate that there were no suitable sites within or on the edge of the town centre for a new foodstore before an approval could be granted on that site. This is known as the

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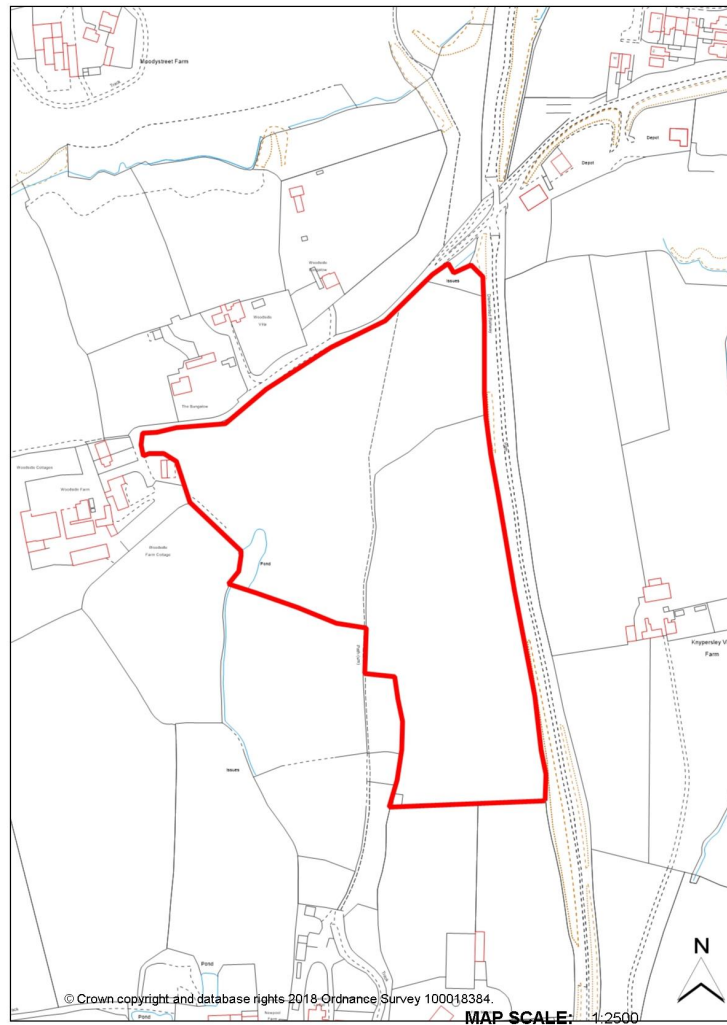
ISSUE	RESPONSE
	'sequential test' and is part of Government planning policy.
Biddulph Moor instead	Biddulph Moor is surrounded by Green Belt and the Local Plan strategy is to focus the highest proportion of development in the towns.
Station Road	Land at Station Road is too small for an allocation but could come forward at any time through the planning applications process as it is in the town boundary.
Spread Development	Biddulph is surrounded by Green Belt so spreading development around would still result in some Green Belt development.
GI Strategy	The policy also requires that the priorities and actions identified in the Council's Green Infrastructure Strategy are incorporated into a development scheme.
BDNEW added at last minute	The Local Plan production process by its very nature is an evolving process. Drafts of the plan are produced, consultation is undertaken and changes are made to the plan throughout the process. BDNEW was suggested for consideration as part of the Preferred Sites and Boundaries Consultation. It was included at Preferred Options Stage and consultation has taken place, the results of which will be considered by the Council.
Negative impact on surrounding amenities	Amenity issues will be carefully considered at the planning application stage.
Development will lead to increased noise	Potential noise levels from new development will be assessed at the time a planning application is being considered in accordance with the latest noise guidance available at that time which currently states that noise is a material consideration in the planning process and a key aspect of sustainable development.
Empty Properties already exist	Empty properties are already taken into account when calculating housing need figures.
Property Values	Property values are not material in planning law.
Affordable Housing	Policy H3 of the Local Plan requires a target of 33% affordable housing on the site. The types of affordable housing will meet demand in the area in order to help address existing affordability issues.
Density levels	Assumed densities for this area are relatively low at 30-35 dwellings per hectare. Actual density levels will be determined through a masterplan process once all the constraints can be assessed in full detail.
Heritage Impact	A Heritage Impact Assessment of the whole area has been undertaken and it has been deemed suitable for development in heritage terms.

Local Plan Publication (Submission Version February 2018)

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Refer to Staffordshire Moorlands Local Plan (Submission Version) Consultation Analysis Report May 2018.



Picture 9.8

Tunstall Road Strategic Development Area

BD117

Biddulph
BD117 Tunstall Road Strategic Development Area

Local Plan Process

- Site suggestion from the SHLAA
- Included in the options consultation July 2015
- Included in the Preferred Sites and Boundaries consultation April 2016
- Included in Preferred Options Local Plan July 2017
- Included in Submission Version Local Plan (February 2018) as 'Tunstall Road Strategic Development Area' with boundary adjustment to include properties fronting Tunstall Road.

Current Position

Site taken forward into Submission Version Local Plan. Reason:

- The Council's Core Strategy acknowledges that some Green Belt release is necessary to enable sufficient growth in Biddulph. The Submission Version Local Plan seeks to deliver Biddulph's housing and employment requirement whilst ensuring that Green Belt release is kept to a minimum. Approximately, 255 homes are now planned on land currently designated as Green Belt in Biddulph (part of Wharf Road and Tunstall Road sites) compared to 480 in the 2016 consultation. This has been achieved by amendments to the proposed allocations with consideration given to their respective planning merits.
- Land at Tunstall Road is proposed to be developed as part of a mixed use employment / residential scheme in order to address demand for employment and housing in Biddulph. It is considered that this site is ideally located with good road links opposite Victoria Business Park and bringing it forward will have a positive impact on the local economy.
- Considering these factors collectively, it is considered that there are exceptional circumstances to release land at Tunstall Road from the Green Belt.

Key Issues

- Green Belt site – suitable for release if exceptional circumstances are demonstrated.
- Mixed use split as follows:
 - Site boundary for whole site (mixed use) then in policy stipulate:
 - At least 4.99ha (gross) for employment
 - 2.19ha (gross) for housing (85 @38.8dph - gross) – density reflects residential development nearby and house types likely to be smaller on a site in this location.
- Access is good site is on major road
- Good infrastructure links
- Majority of site (to east) has a high landscape sensitivity. Site-specific landscape mitigation measures could include planting within and on the edges of the development, and limits on building sizes and scale.
- Site suitable for development in heritage terms.
- Site has a mining legacy.
- Ecology - Further survey work recommended in order to establish SBI/BAS status.
- Small part of site is unregistered though the owners have been identified.

Biddulph
BD117 Tunstall Road Strategic Development Area

Site Information

Greenfield/ brownfield	Built up area boundary/ countryside	Est. housing capacity	Area (ha)	Ownership status	Site details
Greenfield	Countryside Green Belt	Mixed use employment/ housing	7.18 (gross)	5 owners – all willing to release. (Small part of site is unregistered)	<ul style="list-style-type: none"> • Agricultural land • Relatively flat • Mining legacy • Includes houses fronting Tunstall Road in site boundary as a response to a consultation comment from the County Council (previously excluded at Preferred Options Stage), which adds another 0.44ha (gross) of land to the site area (previously 6.74ha) so 5 additional houses and 0.25ha (gross) employment land.

Studies

Local Plan and Site Allocations Viability Study (May 2018)

The results of the viability testing for Tunstall Road (DSB 3) shows that the development of this site could support 20% affordable housing provision with surplus of £50 per sq.m. This level of surplus would also be sufficient to support the cost of education contributions and requirements to achieve M4 (2). At 33% affordable provision Tunstall Road produces a small deficit equivalent to -£17 per sq.m. These results indicate that this development would not be sufficiently financially viable to support 33% affordable housing together with contributions to education and requirements for M4 (2).

Local Plan Housing Trajectory

The site is in the housing trajectory ('Biddulph – Tunstall Road') to begin within five years and complete around the middle of the plan period (2021/2022-2024/2025).

Biddulph **BD117 Tunstall Road Strategic Development Area**

Accelerated Housing Delivery Programme

The Council is taking a pro-active approach to delivery of housing in the District through its accelerated housing delivery programme (agreed at Cabinet on 24th April 2018).

Masterplanning work is being undertaken on key sites including the Tunstall Road Strategic Development Area (as stated in Policy DSB3) with the aim of bringing together landowner aspirations and assessing site constraints to produce options for site layouts, valuations and delivery plans in order to help bring the sites to fruition.

Extended Phase 1 Habitat Survey 2015 (FID 210)

The site has very low biodiversity value overall, however as there are 2 trees with bat roosting potential and species rich hedgerows. Therefore, the site has some ecological importance. The following surveys/ actions are therefore recommended prior to any potential development works being carried out:

- A bat survey regime to ascertain whether bats roost in the trees
- Hedgerow survey
- Vegetation removal at the appropriate time of year

Local Wildlife Assessment (ECUS, 2016)

The site has some ecological value in its potential to support protected species. The site habitats are considered to be of nature conservation value at site level only. However, more information is required regarding the scattered trees on site in order to establish their ecological importance.

The following surveys/ actions are therefore recommended in order to establish SBI/ BAS status:

- Hedgerow survey following modified HEGS methodology
- Relevant trees to be identified and further assessed for their potential to support roosting bats. Following this a bat survey may possibly be required.

Sustainability Appraisal

Sustainability Appraisal Submission Version June 2018

The development of new employment premises should have a significant positive effect on the vitality and viability of the District, strengthen economic growth and support a higher level of employment within the District. However, the greenfield nature of this site and its location outside of the settlement boundary, coupled with its ecological importance could have a negative effect.

This is a large site comprising fields on the southern edge of Biddulph, east of the A527 (Tunstall Road); south of Victoria Row; and north and west of Mill Hayes Road. Residential properties and a smallholding are located on the A527 and are enclosed by the site.

The Council's Green Belt review has recommended considering this site for release from the Green Belt if exceptional circumstances are demonstrated. The potential landscape impact of development requires further assessment. There are no designated heritage assets within the 400m buffer. This site was taken forward as a preferred option (housing / employment mixed-use) for consultation in April 2016.

Biddulph

BD117 Tunstall Road Strategic Development Area

The Extended Phase 1 Habitat Surveys and Local Wildlife Site Assessment (May 2017) considered that the site has some ecological value in its potential to support protected species. The site habitats are considered to be of nature conservation value at site level only. However, more information is required regarding the scattered trees on site in order to establish their ecological importance.

The Council's Landscape, Local Green Space and Heritage Impact Study (August 2016) considered the landscape sensitivity of the site to be low in the south-west, increasing to the north-east corner of the site where sensitivity was considered to be highest. The study found that the site is large and open with high visual prominence, particularly in the north and east of the site, with long distance views available from the footpath on the northern boundary. Visual prominence is lower in the south-west of the site, south of the existing properties on the A527, where the land is enclosed by trees and hedgerows. Site-specific landscape mitigation measures could include planting within and on the edges of the development, and limits on building sizes and scale. The site was proposed for inclusion in the July 2017 preferred option Local Plan for residential use.

Initial HRA Screening

No Likely Significant Effects (LSEs) have been identified in relation to the preferred option site allocations in Biddulph.

Landscape, Local Green Space & Heritage Impact Study (August 2016)

Landscape Results:

Large site comprising fields on the southern edge of Biddulph, east of the A527 (Tunstall Road); south of Victoria Row; and north and west of Mill Hayes Road. Residential properties and a smallholding are located on the A527 and are enclosed by the site. The site is opposite Brown Lees Industrial Estate, which is located on the opposite side of the A527. However, despite this, the site is rural in character. The agricultural buildings enclosed by the site and the cottages on Victoria Row contribute to this character. The site is large and open with high visual prominence, particularly in the north and east of the site, with long distance views available from the footpath on the northern boundary. Visual prominence is lower in the south-west of the site, south of the existing properties on the A527, where the land is enclosed by trees and hedgerows. The landscape sensitivity of the site is low in the south-west, increasing to the north-east corner of the site where sensitivity is highest. In order to limit potential landscape impacts the existing vegetation in the south-west of the site should be retained, and additional planting could be undertaken on the edges of, and within the development, to create a strong vegetated edge and soften the appearance of the development in long distance views. Limits on the size and scale of buildings would also soften the appearance of the development.

South-west of site (south of properties on A527 – Section A) is of low landscape sensitivity, increasing to high sensitivity in the north-east across the remainder of the site (Section B). Site-specific landscape mitigation measures could include planting within and on the edges of the development, and limits on building sizes and scale.

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Please note that this study forms part of a wider evidence base to support SMDC's Local Plan. Therefore, the conclusions within this report will be weighed against other evidence when determining the overall suitability of a site for development.

Heritage Results:

There are no designated heritage assets within the 400m buffer. Development would be highly unlikely to adversely affect the HLC zone BBHECZ 5 (Historic Environment Character Assessment 2010).

Site suitable for development in heritage terms.

Green Belt Review (2015)

Check Sprawl – Limited contribution

Maintain separation – contribution

Prevent encroachment – limited contribution

Preserve setting – contribution

Overall impact – limited – 'proposed for employment, this site would infill land between Mill Hayes Road and the A527 Tunstall Road. As such, the land is reasonably well bounded, although smaller boundaries to the east and north are hedgerows. (See also land to the north of Mill Hayes Road).

Recommendation – Consider for release – Release under exceptional circumstances, should be accompanied by extension of the Town Boundary.

Mining

This area, along with many others around Biddulph, has a mining legacy. The Coal Authority has advised that new development should recognise the problems and how they can be positively addressed. They consider that mining legacy is not always a complete constraint and new development can address issues making it safe, sustainable and stable. The mining legacy of this site will not prevent development

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but detailed site investigation work must take place to inform site design. Land in the central part of the site and land immediately adjacent to Tunstall Road is defined as a high risk mining area. The rest of the site is low risk. According to the latest Coal Authority data, there are no mine entries on or adjacent to the site.

Minerals

- The site affects potential sand and gravel resources as well as coal and associated fireclay resources. The site is within a Mineral Safeguarding Area.
- The site is not in close proximity to a permitted or allocated mineral site.
- The site is constrained by existing neighbouring properties but involves 7.18ha.
- Coal Authority records indicate that there are coal outcrops within the site and that there is a high risk of mining legacy issues.
- It is noted that the Coal Authority have advised that detailed site investigation work must take place to inform site design. Policy SD1 is relevant and a mineral safeguard statement is required.

Options Consultation July 2015

Statutory bodies/stakeholders

Historic England: Made no comments on individual sites recommended that a heritage impact assessment of sites is carried out. (This work has now been undertaken).

Environment Agency: Site not identified as being in an area likely to be affected by flooding. Need to have regard to the relevant River Basin Management Plan.

Coal Authority: Staffordshire Moorlands is an area where there have been significant coal mining activities which have left a legacy. Recommend that sites are assessed to determine if there coal related hazards which require remediation and the likely impact on mineral resources. Previous coal workings do not prevent development of sites and therefore do not wish to recommend any sites are excluded from assessment on mining legacy grounds.

United Utilities, Severn Trent, Heritage England, Natural England, Network Rail; no site specific comments

SCC Highways - Where would access be taken? Access to south may have visibility issues, access to the north would conflict with traffic light controlled junction. Access through Victoria Row is at crossroads Brown Lees Road. Careful consideration required.

Developer/Agent/Owner – Portion of land available, part of site availability unknown.

Public response 7 comments – 6 objections, 1 support.

Issues raised:

Objections:

- Infrastructure - Other - query availability of infrastructure
- Landscape - Land has some of the best views over to the Moorlands from anywhere in Biddulph and it would be deplorable to ruin this.

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- Amenity (e.g. noise, privacy, loss of light) - would have a detrimental impact on residents
- Scale of development - constitutes over-development
- Government Policy - urban sprawl - concern about merging with Stoke on Trent, land is Green Belt and part of the open countryside, contrary to Core Strategy para. 7.56 and policies SO9 and C1
- Other - Site more suited to housing than employment due to vacant units and scope for extension of Victoria Business Park - could accommodate over 200 homes and lessen the need to consider BD063a, residential development here would have less impact than employment and its location on a major road would appeal to potential purchasers, query agricultural classification of this land? No need for more employment units, there is still availability on Victoria Business Park and the steel works sites. Concerned about complicated response form and consider that filling in one form per site is overly onerous.

Support:

- Infrastructure - Traffic / Transport - area is situated on a major road and access could easily be achieved.
- Other - Ideal location opposite existing successful business park. Can benefit from using existing infrastructure with its close links to Stoke and the M6 without having to go through the town, more jobs are needed. Query why employment land requirement of 25-45 hectares is higher than stated in the Core Strategy.

Council response –

- The Council's Core Strategy (Policy SS4) distributes the District's employment land requirement from the Council's Employment Land Study. Taking into account existing commitments this highlights a need for approximately 2 hectares of additional employment land in Biddulph to 2031. The town is heavily constrained by the Green Belt so identification of a suitable site is not straightforward. BD117 has been identified primarily due to its good road links, close proximity to the Victoria Business Park opposite and minimal impact on the Green Belt.
- Discussions have taken place with County Highways and it is considered that a suitable access point could be created to serve the site.
- The land in question is within the Green Belt. In order for Biddulph to accommodate new development, the Green Belt boundary will need adjustment as there are not enough sites in the existing settlement boundary to accommodate the level of development needed. The Council has recently completed a Green Belt Review in order to assess parts of the Green Belt where minor adjustments can be made without having an impact on the function of the Green Belt as a whole (as defined in government planning guidance). This study recommends considering site BD117 for release from the Green Belt.
- The land is not identified as being important to the setting of the settlement in the Council's Landscape & Settlement Character Assessment. A Landscape & Visual Impact Assessment will be undertaken during the plan production process and look at all preferred option sites suggesting mitigation measures where appropriate. The results will be incorporated into the Submission Version of the Local Plan.

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- Amenity – issues such as overlooking, screening and other impacts on existing residents will be assessed in detail once a site layout has been determined at the time a planning application is received and residents will have the opportunity to comment on the content of that application. Views from individual properties are not protected in planning law.
- It is not agreed that there is available space on Victoria Business Park as all the land on the current site has been sold or leased and there is no scope to extend it onto land immediately adjacent. In any case, the 2 hectare requirement is over and above the Victoria Business Park and the steel works sites as well as all other existing employment sites.
- The agricultural land classification of this land is grade 4 which is defined as being poor quality.

Preferred Options April 2016

EMPLOYMENT ELEMENT

Statutory bodies/stakeholders

United Utilities Water Limited - With regards to site reference BD117, site appears likely to discharge to that area served by Severn Trent for the provision of wastewater services. It would be useful to confirm with the respective landowners the likely point of discharge to the wastewater network from these sites so that we can confirm the receiving wastewater infrastructure and therefore better understand the impact.

Council Response:

Points of discharge to the wastewater network are a detail which can be confirmed at a later stage in the process once the sites have been allocated in the Local Plan and detailed development schemes become available at the planning application stage.

Staffordshire County Council - Site BD117 ideally should be extended to cover entire unbroken frontage of A527 to provide access in conjunction with Victoria Business Park.

Biddulph Neighbourhood Plan Working Group - BD117 - Access must be from Tunstall Rd, recommended for inclusion.

Developer/Agent/Owner – One owner objects to employment on his land would prefer housing. One owner supports development.

Public Response

Issues raised:

- Why can't housing go on this site?
- No need for any more employment units

Council Response

- **Why can't housing go on this site?**

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This site has been selected primarily for employment use as it has good road links and is well related to Victoria Business Park so is likely to be attractive to businesses to help meet the employment needs of the District (see below).

- **No need for any more employment units**

An assessment of employment land requirements by NLP in February 2017 concluded that 13ha to 27ha of employment land was required to meet the needs of the district 2014-2031. It was recommended and agreed by Council Assembly on 08/03/17 that an annual housing requirement of 320 homes per year (close to combined jobs growth scenario) was taken forward into the Preferred Options Local Plan. An employment land requirement of approximately 27ha was therefore recommended up to the year 2031 for the Preferred Options Local Plan on the basis that it was at the top of the OAN range for employment and so closely corresponds with the proposed housing requirement to support sustainable development. Applying the 20% requirement for Biddulph wards in Pol SS3 Core Strategy gives a requirement for the town of at least 5.4ha, less qualifying 2014-17 employment commitments. A range of employment site choices have been selected for Biddulph – either close to the town centre or to the existing Victoria Business Park.

HOUSING ELEMENT

Landowners:

2 owners responded in support of residential

Natural England: Natural England notes the proposed preferred site for allocation in Biddulph. We note that it is located close to and/or adjoining existing areas of open space and green infrastructure. Suitable enhancements of existing open spaces' may be required together with appropriate management (and funding thereof) in order to allow these open spaces to function effectively during the local plan period. Similarly the development of these preferred sites (if progressed) will need to include suitable multi-functional green infrastructure. Adopted local plan spatial objectives SO8 & 9 refer together with policies such as DC1 Design Considerations, DC3 landscape and settlement setting, and C3 Green Infrastructure.

Council Response

The Council has produced a Draft Green Infrastructure Strategy for consultation alongside the next draft version of the Local Plan. The strategy identifies green infrastructure corridors around the towns and lists particular issues in relation to that corridor which can be addressed as part of the relevant site policy and / or at the planning application stage. Similarly, a public open space study is underway covering all designated public open spaces in the Staffordshire Moorlands. One of the areas this will advise on is where improvements are needed to these spaces and new development in the vicinity could contribute towards this. The Council has also designated Local Green Spaces in line with criteria set out in the NPPF and the Council will seek to facilitate improvements to these areas where required.

Public Response

19 objections

40 support

Issues raised:

- Green Belt
- Landscape

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- Housing / employment mix – why not 100% housing, why employment?
- Flooding
- Highways
- Use Childerplay Road instead

Council Response

• **Green Belt**

The Council has undertaken a Green Belt Review (published in 2015) to assess all the Green Belt in the Staffordshire Moorlands and determine whether it may be suitable for removal from the Green Belt to meet the District's future development needs to 2031. For this site, it was concluded that the overall impact of development on the Green Belt would be limited. 'This site would infill land between Mill Hayes Road and the A527 Tunstall Road. As such, the land is reasonably well bounded, although smaller boundaries to the east and north are hedgerows. (See also land to the north of Mill Hayes Road). Recommendation – Consider for release – Release under exceptional circumstances, should be accompanied by extension of the Town Boundary.'

• **Landscape**

The Council has also undertaken a Landscape Impact Assessment of the site and this concludes that part of the site (adjacent to Tunstall Road) is of low landscape sensitivity but most of the site (south and east of Victoria Row) is of high landscape sensitivity and landscape mitigation measures are recommended if this area were to be developed.

• **Use Childerplay Road instead**

Childerplay Road is within the Green Belt like BD117. The Green Belt Review has considered the impact on the Green Belt the release of this area for development would have. The Childerplay Road area is not considered suitable for release from the Green Belt. Area BD117 is considered suitable for release from the Green Belt.

• **Flooding**

The Environment Agency commented on the site at the Site Options Consultation Stage in 2015 and said "Site not identified as being in an area likely to be affected by flooding."

• **Highways**

The Highway Authority has agreed that access from Tunstall Road opposite the Tunstall Road / Brown Lees Road junction would be acceptable.

• **Housing / employment mix – why not 100% housing, why employment?**

An assessment of employment land requirements by NLP in February 2017 concluded that 13ha to 27ha of employment land was required to meet the needs of the district 2014-2031. It was recommended and agreed by Council Assembly on 08/03/17 that an annual housing requirement of 320 homes per

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year (close to combined jobs growth scenario) was taken forward into the Preferred Options Local Plan. An employment land requirement of approximately 27ha was therefore recommended up to the year 2031 for the Preferred Options Local Plan on the basis that it was at the top of the OAN range for employment and so closely corresponds with the proposed housing requirement to support sustainable development. Applying the 20% requirement for Biddulph wards in Pol SS3 Core Strategy gives a requirement for the town of at least 5.4ha, less qualifying 2014-17 employment commitments. A range of employment site choices have been selected for Biddulph – either close to the town centre or to the existing Victoria Business Park.

This site has been selected primarily for employment use as it has good road links and is well related to Victoria Business Park so is likely to be attractive to businesses to help meet the employment needs of the District.

Preferred Options Local Plan July 2017

Statutory bodies/stakeholders

Severn Trent –

Known network constraints – The model does not have a storm system modelled. There are no flooding incidents downstream. Knypersley - Tunstall Road (Combined Sewer Overflow) is the downstream Combined Sewer Overflow located 1km from the development.

Assumed connectivity - The assumed connection is north of the site adjacent to Victoria Row with pipe diameter of 300mm.

Surface Water Disposal - There is an existing surface water system that runs along the north side of the development which outfalls into an unnamed watercourse. This system is 225mm and could potentially take the surface water flows from the new development.

Potential impact on sewerage - Low - (subject to hydraulic modelling).

Response:

Comments noted.

SCC Highways - Would be preferable to include the house in the centre of the frontage, which is currently excluded, in the allocation if possible. A better junction arrangement could then be provided, linking in with the traffic signals for Victoria Business Park.

Response:

Comments noted. The site boundary has been amended as suggested and this has resulted in a housing capacity increase of 5 dwellings (from 80 to 85).

SCC Ecology – The policies would provide stronger and clearer support of policy NE1 if they were amended, where relevant, to state:

'be supported by surveys and actions recommended by the Extended Phase 1 Habitat Survey and Local Wildlife Assessment and include measures for protection and enhancement of site biodiversity and geodiversity as appropriate (or similar wording).'

Response:

Biddulph **BD117 Tunstall Road Strategic Development Area**

Comments noted. An amendment to the policy wording for DSB3 to reflect the above is considered appropriate.

Natural England - Acknowledge that our previous comments on this site have been taken on board and that opportunities to make linkages to the wider GI network will be considered.

Response:
Support noted.

Developer/Agent/Owner – A key landowner responded confirming support for allocation and stated that other landowners also support. Landowners of properties being added to site boundary support this.

Public Response:
267 comments – 253 support, 11 object and 3 general.

Main Issues Raised:

Support:

- Allocation of 80 houses at Brown Lees will help to re-establish Brown Lees as a vibrant community.
- Allocation is on the edge of town but within close proximity to amenities.
- Site is on the edge of the town but close enough for people to make use of the town's amenities.
- Site is on brownfield land.
- Development here would improve the way the town looks, on entry to it.
- Good access to main roads, and Stoke-on-Trent. Many people who live to the south of Biddulph work in Stoke-on-Trent
- Although some of the people who supported this allocation are against development of Green Belt land, they felt this site was a relatively small area of Green Belt that would extend the building to the south of Biddulph.
- This site would have minimal visual impact on other developments or residencies.
- A logical continuation of the settlement boundary.
- No specific reason was given by some of those who voted in support of this allocation.

Objection:

- Development here would change the town boundary.
- Employment development should be kept west of Tunstall Road.
- Development will result in increased traffic and congestion, which may have an adverse effect on the safety of pedestrians (including children who use this road as a shortcut to school).
- Site is in the Green Belt yet exceptional circumstances for development have not been demonstrated.
- No other specific reasons were given by those who objected to this allocation.

Council Response:

Green Belt

Biddulph

BD117 Tunstall Road Strategic Development Area

The Council's Green Belt Review concludes that the site could be considered for release from the Green Belt provided that exceptional circumstances can be demonstrated. The exceptional circumstances relating to this site are that it is ideally located with good road links opposite Victoria Business Park and bringing it forward will have a positive impact on the local economy. The Council has fully explored options for meeting its development needs without using Green Belt land. Biddulph is unique in that it is the only town in the Staffordshire Moorlands which is surrounded by Green Belt. This was taken into account at the time the Core Strategy was produced when Biddulph's housing proportion was less than the other towns at 20% of the total District housing figure to 2031. This proportion has been carried through into the Local Plan. Following recent consultation and evidence, the Council has reduced the amount of Green Belt land identified for development in Biddulph but there is not enough non-green belt land to meet all of the town's future development requirements.

Landscaping

The accompanying site policy (DSB3) requires a comprehensive masterplan to include provision of a landscaping plan to address the high landscape sensitivity of most of the site, namely planting within and on the edges of the development, and limiting the sizes and scale of buildings. It also requires landscaping to be used as a buffer between the residential and employment elements.

Highways

The Council has been in close consultation with the County Highways Department throughout the Local Plan production process. County Highways have not objected to the principle of development on this site. Policy DSB3 (which relates to this site), requires a Transport Assessment in advance of any development taking place.

Need for more Employment Land

An assessment of employment land requirements by NLP in February 2017 concluded that 13ha to 27ha of employment land was required to meet the needs of the district 2014-2031. It was recommended and agreed by Council Assembly on 08/03/17 that an annual housing requirement of 320 homes per year (close to combined jobs growth scenario) was taken forward into the Preferred Options Local Plan. An employment land requirement of approximately 27ha was therefore recommended up to the year 2031 for the Preferred Options Local Plan on the basis that it was at the top of the OAN range for employment and so closely corresponds with the proposed housing requirement to support sustainable development. Applying the 20% requirement for Biddulph wards in Pol SS3 Core Strategy gives a requirement for the town of at least 5.4ha, less qualifying 2014-17 employment commitments. Two employment site choices have been selected for Biddulph – one close to the town centre and one close to the existing Victoria Business Park.

Mining

The mining legacy of this site will not prevent development but detailed site investigation work must take place to inform site design. Land in the central part of the site and land immediately adjacent to Tunstall Road is defined as a high risk mining area. The rest of the site is low risk. According to the latest Coal Authority data, there are no mine entries on or adjacent to the site.

Ecology

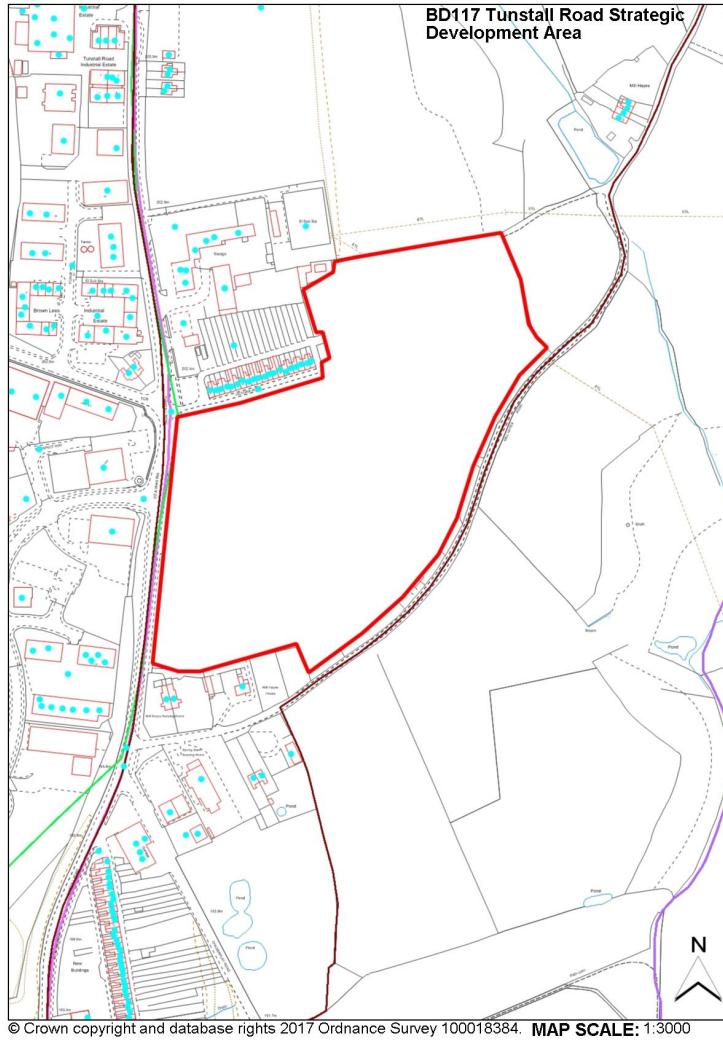
Policy DSB3 requires that the surveys and actions recommended by the Council's Extended Phase 1 Habitat Survey and Local Wildlife Assessment are implemented as well as provision of a landscaping plan.

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Local Plan Publication (Submission Version February 2018)

Refer to Staffordshire Moorlands Local Plan (Submission Version) Consultation Analysis Report May 2018.

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Picture 9.9

The Omission Sites



10 The Omission Sites

The Omission Sites

Local Plan Omission Sites

10.1 Site Proformas are included for the following residential sites **not** to be taken forward into the Submission Version Local Plan:

ADD03 - (Previously included as a site option in 2016)

Biddulph

ADD03 Off Akesmoor Lane

Local Plan Process

- Not included in the Options stage
- Site was suggested for consideration in the Green Belt Review
- Additional site included the Preferred Options consultation April 2016
- Not included in Preferred Options Local Plan July 2017
- Not included in Submission Version Local Plan (February 2018)

Current Position

Site not taken forward into Submission Version Local Plan as:

- An alternative Green Belt site exists adjacent to Wharf Road which will assist with bringing forward a large strategic mixed use regeneration site which is well related to the town centre and its key services and facilities.
- Uncertainty with land availability.
- A combination of high landscape sensitivity across the whole of the site and heritage issues with the northern part of the site.
- On planning balance the Council has concluded that the selected sites are the most appropriate solution for Biddulph and minimise Green Belt release.

Key Issues

- Green belt site – considered to be suitable for removal if exceptional circumstances are demonstrated.
- Would need access improvements – but could be achieved according to Highway Authority.
- Ownership issues - large area of land to south not registered, pockets of landowners who will not release their land. Nine (known) different owners.
- Whole of site is high landscape sensitivity.
- Heritage – Listed Building present in northern part of site - develop south of site only.
- Historic landfill may be a constraint.
- Ecology – further survey work along the brook recommended – potential for SBI / BAS designation.

Site Information

Greenfield/ brownfield	Built up area boundary/ countryside	Est. housing capacity	Area (ha)	Ownership status	Site details
Greenfield	Countryside Greenbelt	60	Approx 13.5 (gross)	In multiple ownerships part of site is unregistered and owner not known. 3 owners agreed to development 2 owners did not want to release their land for development.	<ul style="list-style-type: none"> • Access from Akesmoor Lane would need to be improved • Reasonable access to services & facilities • Listed building on site

Biddulph

ADD03 Off Akesmoor Lane

Studies

Landscape & Settlement Character Assessment 2008

Not within important landscape setting to the settlement.

Extended Phase 1 Habitat Survey 2016

Ecus Ltd conducted Phase 1 ecological survey (incorporating Local Wildlife Site Assessment) in 2016. It concluded that the habitats on site were considered to be of nature conservation value at the site level only and are not listed as an important habitat in the Staffordshire SBI guidelines. However, further surveys are recommended of the semi-natural broadleaved woodland present along the brook as this could qualify as an SBI under the Staffordshire guidelines.

Species recorded on site were common and widespread both at a county and national level and it is considered unlikely that the site significantly supported any notable protected species. Some species are listed as important in the Staffordshire SBI guidelines and therefore the site does currently qualify for consideration as an SBI or as a BAS under these criteria. However, prior to any future development the site should be checked again for signs of badger and activity surveys should be conducted to better determine use of the site by bats, especially along the eastern boundary. It would be necessary to conduct nesting bird checks before vegetation clearance or other disturbance during the bird breeding season.

Green Belt Review 2015

(Appraised sites according to their contribution to Green Belt Purposes)

Check Sprawl: Contribution

Maintain Separation: Limited contribution

Prevent Encroachment: Significant contribution

Preserve Setting: Moderate

Overall Impact on Green Belt Purposes: Moderate

This land is a continuation of development immediate to the north, and whilst it breaches the boundary of the disused railway line, is contained by Akesmoor Lane and sits within the lower reaches of the slope, particularly in its northern reaches. The southern extent of this land is more difficult given rising landform and lack of a clear containing boundary. Advance planting/boundary treatment would almost certainly be required as part of a detailed masterplanning exercise which considers the development fit (in terms of location, building heights and densities) very carefully

Recommendation: Consider for release.

Landscape, Local Green Space & Heritage Impact Study (August 2016)

Landscape Results

Large site on the western edge of Biddulph, comprising agricultural land and two farmsteads (Moodystreet Farm and Hollylane) and sheds, enclosed by Akesmoor Lane to the west. The site is located beyond the dismantled railway, which currently forms a strong, vegetated settlement edge and limit to development. The site is inter-visible with the Green Belt to the west. Development within the site would encroach on the surrounding countryside, and would adversely affect the existing settlement edge. Development of the site could potentially compromise the surrounding

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ADD03 Off Akesmoor Lane

sensitive countryside, as there would be no clear limit to development beyond the site.

Site is of high landscape sensitivity. Please note that this study forms part of a wider evidence base to support SMDC's Local Plan. Therefore, the conclusions within this report will be weighed against other evidence when determining the overall suitability of a site for development.

Heritage Results

There is one Grade II Listed Building within the site. The setting of the asset contributes to the overall significance of it and would need special regard for its preservation. Development would be highly likely to cause adverse effects to its setting. Therefore, any development should be restricted to the southern part of the site only and mitigation should include the use of vegetation screening to reduce adverse effects to its setting. Whilst the HEA states that zone BBHECZ 18 cannot absorb significant change, development to the south of the site would be a small change to the zone as a whole, and with appropriate development, this could be accommodated on the site (Historic Environment Character Assessment 2010).

Site is suitable for development in heritage terms, subject to suitable masterplanning; *if development is restricted to the southern part of the site only and with appropriate screening.*

Sustainability Appraisal

Sustainability Appraisal Submission Version June 2018

The proposed delivery of circa 372 dwellings is considered to have a significant positive effect. The site's location away from designated assets is likely to have a positive effect, as could the site's accessibility to services, facilities and areas of existing employment. However, the site's proximity to historic assets is likely to have a significant negative effect. The development of greenfield land indicated on the predictive map of Best and Most Versatile agricultural land as largely within an area where 20 - 60% of the land is likely to be BMV is considered to have a negative effect.

This is a large site on the western edge of Biddulph, comprising agricultural land and two farmsteads (Moodystreet Farm and Hollylane) and sheds, enclosed by Akesmoor Lane to the west. According to information held by the Environment Agency, this site is located above historic landfill sites. The Council's Green Belt review has recommended considering this site for release from the Green Belt if exceptional circumstances can be demonstrated. The potential landscape impacts of development require further assessment.

This site was taken forward as a preferred option for consultation in April 2016.

The Extended Phase 1 Habitat Surveys and Local Wildlife Site Assessment (May 2017) considered that the habitats on site were considered to be of nature conservation value at the site level only and are not listed as an important habitat in the Staffordshire SBI guidelines. However further surveys are recommended of the semi-natural broadleaved woodland present along the brook as this could qualify as an SBI under the Staffordshire guidelines. Species recorded on site were common

Biddulph

ADD03 Off Akesmoor Lane

and widespread both at a county and national level and it is considered unlikely that the site significantly supported any notable protected species.

There is one Grade II Listed Building within the site. The site was considered by the Council's Landscape, Local Green Space and Heritage Impact Study (August 2016) which notes that the setting of the asset contributes to the overall significance of it and would need special regard for its preservation. It was considered that development would be highly likely to cause adverse effects to its setting and that any development should be restricted to the southern part of the site only with mitigation measures including the use of vegetation screening.

The site was considered by the Council's Landscape, Local Green Space and Heritage Impact Study (August 2016) to be of high landscape sensitivity. The study found that the site is located beyond the dismantled railway (Biddulph Valley Way) which currently forms a strong, vegetated settlement edge and limit to development and that the site is inter-visible with the Green Belt to the west. It was considered that development within the site could encroach on the surrounding countryside, and adversely affect the existing settlement edge. Development of the site could potentially compromise the surrounding sensitive countryside, as there would be no clear limit to development beyond the site.

Masterplanning should be used to demonstrate how a development scheme could be accommodated in the light of heritage and landscape impacts identified and to contribute to the priorities and actions proposed for the Biddulph strategic GI corridor (as set out in the Green Infrastructure Strategy), including by supporting public access on to the Biddulph Valley Way. A masterplan should also take account of the potential ecological value of the site.

The site was not proposed for inclusion in the July 2017 preferred option Local Plan.

Initial HRA Screening

No Likely Significant Effects (LSEs) have been identified in relation to the preferred option site allocations in Biddulph.

Minerals

SCC Minerals Team – no comment.

Options Consultation July 2015

The site was not included in the Options stage it was suggested for consideration in the Green Belt Review and was an additional site added in at Preferred Options.

Initial Responses received

Statutory bodies/stakeholders

Historic England: Made no comments on individual sites recommended that a heritage impact assessment of sites is carried out. (This has since been undertaken).

Coal Authority: Staffordshire Moorlands is an area where there have been significant coal mining activities which have left a legacy. Recommend that sites are assessed to determine if there coal related hazards which require remediation and

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the likely impact on mineral resources. Previous coal workings do not prevent development of sites and therefore do not wish to recommend any sites are excluded from assessment on mining legacy grounds.

Historic England ADD03 - green belt release for housing with a possible school - It is not clear how the impact of the site allocation on the Grade II listed building Whitehouse Cottage and its setting has been considered. Further information on this is required. (The Council's Heritage Impact Study has now been published).

United Utilities, Severn Trent, Natural England, Network Rail; no site specific comments

SCC Highways – From a highways point of view, a Transport Assessment (TA) would be required. Junctions on the route to the bypass, on the bypass and beyond would need to be considered in the TA and likely improved. Akesmoor Lane would need to be improved along its entire length (or at least towards Biddulph) – widen, reconstruct, drainage, road lighting etc. Third party Land may be required. Two access points on to Akesmoor Lane to serve the development would suffice.

Developer/Agent/Owner – Awaiting response from 3 landowners re: part of area which is registered. One further landowner has agreed to release land. Unregistered area – landowner unknown.

Public response None – site was suggested for consideration in the Green Belt Review.

Council Comment

- The land in question is within the Green Belt. In order for Biddulph to accommodate new development, the Green Belt boundary will need adjustment as there are not enough sites in the existing settlement boundary to accommodate the level of development needed. The Council has recently completed a Green Belt Review in order to assess parts of the Green Belt where minor adjustments can be made without having an impact on the function of the Green Belt as a whole (as defined in government planning guidance). This study recommends considering this land for release from the Green Belt.
- Further investigations of this site have been undertaken. The land is in more than one ownership and owners have been contacted. At the time of writing, one owner has responded and indicated that they would be willing to release their land for development. Responses are awaited from the 3 other registered owners. Part of the land is unregistered.
- The Highway Authority considers that development in this area is likely to be feasible, subject to detailed design.

Preferred Options Consultation April 2016

Statutory bodies/stakeholders

Natural England: Natural England notes the proposed preferred site for allocation in Biddulph. We note that it is located close to and/or adjoining existing areas of open

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space and green infrastructure. Suitable enhancements of existing open spaces' may be required together with appropriate management (and funding thereof) in order to allow these open spaces to function effectively during the local plan period. Similarly, the development of these preferred sites (if progressed) will need to include suitable multi-functional green infrastructure. Adopted local plan spatial objectives SO8 & 9 refer together with policies such as DC1 Design Considerations, DC3 landscape and settlement setting, and C3 Green Infrastructure.

Council Response

The Council has produced a Draft Green Infrastructure Strategy for consultation alongside the next draft version of the Local Plan. The strategy identifies green infrastructure corridors around the towns and lists particular issues in relation to that corridor which can be addressed as part of the relevant site policy and / or at the planning application stage. Similarly, a public open space study is underway covering all designated public open spaces in the Staffordshire Moorlands. One of the areas this will advise on is where improvements are needed to these spaces and new development in the vicinity could contribute towards this. The Council has also designated Local Green Spaces in line with criteria set out in the NPPF and the Council will seek to facilitate improvements to these areas where required.

Environment Agency: The following comments highlight sites where we consider there may be issues relating to contaminated land. ADD03: According to information held by the Environment Agency, this site is located above historic landfill sites. The local council, as lead regulator for these sites, should be contacted for further information.

Council Response

It is considered that although this matter will require more detailed investigation at the time a detailed scheme is being developed, it is an additional development cost rather than an issue which would prevent development from taking place.

Biddulph Neighbourhood Plan Working Group: ADD03 - Further investigation is required for this site. It needs to be put out for consultation and comments and see what is the response. Remove narrow northern strip and enter via Wharf Rd off roundabout, recommendation TBD.

Staffordshire Wildlife Trust: Site ADD03 has not been covered by the Extended Phase 1 Habitat Surveys.

Council Response

Ecus Ltd conducted Phase 1 ecological survey (incorporating Local Wildlife Site Assessment) in 2016. It concluded that the habitats on site were considered to be of nature conservation value at the site level only and are not listed as an important habitat in the Staffordshire SBI guidelines. However, further surveys are recommended of the semi-natural broadleaved woodland present along the brook as this could qualify as an SBI under the Staffordshire guidelines.

Species recorded on site were common and widespread both at a county and national level and it is considered unlikely that the site significantly supported any notable protected species. Some species are listed as important in the Staffordshire SBI guidelines and therefore the site does currently qualify for consideration as an SBI or as a BAS under these criteria. However, prior to any future development the site should be checked again for signs of badger and activity surveys should be

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conducted to better determine use of the site by bats, especially along the eastern boundary. It would be necessary to conduct nesting bird checks before vegetation clearance or other disturbance during the bird breeding season. These requirements can be included in policy if the site is selected for development.

Developer/Agent/Owner: Only 1 responded to the consultation - I have considered the plans for the proposed development and I do not wish my land to be considered for the development within the greenbelt and countryside for 330 proposed homes and a school. No consultation responses received from other landowners.

Public response

Petition with 450 signatures objecting to development of ADD03/BD140

Petition with 361 signatures supporting a revised version of ADD03

Plus, individual comments.

Issues raised:

- Impact on BVW
- Ecology
- Highways
- Mining
- Flooding – surface water drainage
- Victoria Colliery and Childerplay
- Question need for housing and school
- Use brown field land first (including mills)
- Loss of Green Belt
- Residential amenity - disturbance from building work
- Resi amenity – noise from school
- Query housing numbers for site
- Devalue property
- Impact on Listed White House
- Impact on residents of Smokies Way – risk of it being used to drop off and pick up children from school
- Impact on Landscape
- Visual impact
- Loss of ancient trees
- Loss of hedgerows
- Loss of public footpath(s)
- Problem of pollution - burning rubbish from local farm
- Build in neighbouring authorities instead
- Reduce size of site (southern part only)
- Allocate smaller sites
- Empty houses are already available in Biddulph
- Lack of infrastructure (doctors etc)
- Poor marketing of consultation
- Consultation period too short
- Website not easy to use
- Sewage works over capacity
- Why was Site not included at site options stage?

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- No employment
- Use Pennine Way instead
- Town centre needs improving
- Where will children play? (POS will be required as part of scheme)
- Need smaller not larger properties
- Agricultural land value
- Impact on air quality
- Housing density too high
- Viability
- Uncertainty over land ownership
- SHLAA record for site does not support inclusion

Council Response

- **Impact on Biddulph Valley Way (BVW) / Visual Impact**

The BVW is a very significant attribute in the town and part of a national Sustrans cycle route. Therefore, any development in the area would be built around it. The route is generally buffered by trees and hedgerows. All new development bordering the route would be required to provide pedestrian and cycle links on to it. The Council has produced a Green Infrastructure Strategy and the BVW is identified within this document. It is not considered that development in this location would impact on the enjoyment of the route and long ranging views (e.g. to Mow Cop) and the wider countryside would remain.
- **Ecology**

Ecus Ltd conducted Phase 1 ecological survey (incorporating Local Wildlife Site Assessment) in 2016. It concluded that the habitats on ADD03 were considered to be of nature conservation value at the site level only and are not listed as an important habitat in the Staffordshire SBI guidelines. Species recorded on site were common and widespread both at a county and national level and it is considered unlikely that the site significantly supported any notable protected species. [Some predevelopment species surveys recommended].
- **Highways**

The Highway Authority has no difficulties with the principle of development in this location. Improvements needed to the road network as a result of development would need to be identified through a Transport Assessment.
- **Mining**

The Council is aware of mining issues which affect a number of green field sites around Biddulph and investigative work will take place in these areas prior to the commencement of any development.
- **Flooding – surface water drainage**

The site is not within floodplain and the Environment Agency has not commented as such. If there is an existing issue with surface water drainage then new development would need to address this. An on site SUDs (Sustainable Urban Drainage) system would be required on this site if it were to be developed.

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- **Victoria Colliery and Childerplay**
Sites at Victoria Colliery and Childerplay Road are within the Green Belt like ADD03. The Green Belt Review has considered the impact on the Green Belt the release of these sites for development would have. Only the Victoria Colliery site was identified as being suitable for consideration for Green Belt release (in exceptional circumstances). In reaching a decision on which sites to include in the Local Plan, the Council must balance evidence and Government policy.
- **Question need for housing and school**
The National Planning Policy Framework requires that local planning authorities identify the objectively assessed need for housing in their areas, and that Local Plans translate those needs into land provision targets. The Council has prepared a Strategic Housing Market Assessment to assess the district's full housing needs, including affordable housing, whilst taking into account migration and demographic change. Staffordshire County Council are the Education Authority and they look at the need for new schools in an area as a result of development. They consider that a new first school would be needed in Biddulph to accommodate the level of new housing development currently proposed. The location of this school would not be decided until the Council has firmed up its plans as to where the new housing development will take place in the town. (There are 2 options put forward as potential locations for a new school in the Preferred Option Sites and Boundaries Consultation booklet).
- **Use brown field land first (including mills)**
Brown field sites have been considered as part of the site selection process and it is agreed that the mills in the centre of Biddulph (particularly Yarn Mill and Minster Mill) would be appropriate for residential development. Albion Mill on Station Road is too small for an allocation of its own but if it is developed it would count towards Biddulph's housing needs. The Biddulph Neighbourhood Planning Group are currently working on a Town Centre Masterplan which includes looking at opportunities for redeveloping brownfield sites.
- **Loss of Green Belt**
In order for Biddulph to accommodate new development, the Green Belt boundary will need adjustment as there are not enough sites in the existing settlement boundary to accommodate the level of development needed. The Council has completed a Green Belt Review in order to assess parts of the Green Belt where minor adjustments can be made without having an impact on the function of the Green Belt as a whole (as defined in government planning guidance). This study recommends considering site ADD03 for release from the Green Belt.
- **Residential amenity - disturbance from building work / noise from school / parking during school drop-off and pick-up times**
Issues such as overlooking will be assessed in detail once a site layout has been determined at the time a planning application is received and residents will have the opportunity to comment on the content of that application. Problems arising from the construction period of any works, e.g. noise, dust, construction vehicles, hours of working (covered by Control of Pollution Acts)

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are not material planning considerations nor is the possibility of noise from the school or parking issues.

- **Query housing numbers for site**
The Preferred Option Sites and Boundaries Consultation Document lists the site as accommodating 60 houses and a new first school. This is an indicative number and clearly if the Education Authority decided that the first school was not required in this location, the Council could decide to increase the number of houses on the site. There will be two further public consultations and a public examination before the plan is adopted so any changes made would be open to comment.
- **Devalue property**
Property values are not considered material in planning law.
- **Impact on Listed White House / Reduce size of site (southern part only)**
Heritage Impact of development on the site has been assessed in the Council's Heritage Impact Study (August 2016), the results for this site are: "There is one Grade II Listed Building within the site. The setting of the asset contributes to the overall significance of it and would need special regard for its preservation. Development would be highly likely to cause adverse effects to its setting. Therefore, any development should be restricted to the southern part of the site only and mitigation should include the use of vegetation screening to reduce adverse effects to its setting. Whilst the HEA states that zone BBHECZ 18 cannot absorb significant change, development to the south of the site would be a small change to the zone as a whole, and with appropriate development, this could be accommodated on the site (Historic Environment Character Assessment 2010). Site is suitable for development in heritage terms, subject to suitable masterplanning; if development is restricted to the southern part of the site only and with appropriate screening." The Council must balance this evidence against all the other evidence relating to this site and reach a decision on whether or not to include it as a development site in the Local Plan.
- **Impact on Landscape**
Landscape impact of development on the site has been assessed in the Council's Landscape Impact Study (August 2016), the results for this site are: "Large site on the western edge of Biddulph, comprising agricultural land and two farmsteads (Moodystreet Farm and Hollylane) and sheds, enclosed by Akesmoor Lane to the west. The site is located beyond the dismantled railway, which currently forms a strong, vegetated settlement edge and limit to development. The site is inter-visible with the Green Belt to the west. Development within the site would encroach on the surrounding countryside, and would adversely affect the existing settlement edge. Development of the site could potentially compromise the surrounding sensitive countryside, as there would be no clear limit to development beyond the site. Site is of high landscape sensitivity." The Council must balance this evidence against all the other evidence relating to this site and reach a decision on whether or not to include it as a development site in the Local Plan.
- **Loss of ancient trees**
If development takes place on this site any protected trees would be preserved unless there are exceptional circumstances in which case re-

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planting would be required. Soft landscaping would be integrated into any scheme.

- **Loss of hedgerows**
If the site is developed hedgerows would be retained within the scheme layout wherever possible.
- **Loss of public footpath(s)**
Public footpaths can be maintained or re-directed. This issue would be considered at the planning application stage.
- **Problem of pollution - burning rubbish from local farm**
This matter is being dealt with separately by the Council.
- **Build in neighbouring authorities instead**
National planning guidance states that the Council should seek to meet the development needs of their area. Neighbouring authorities including Stoke and Newcastle Councils have their own development needs to meet.
- **Allocate smaller sites**
A range of sites are proposed in the plan both large and small to meet Biddulph's housing needs. It would be unrealistic to identify all small sites for Biddulph as the Council is required by the Government to demonstrate that sites they identify will actually be built and smaller sites tend to be less viable.
- **Empty houses are already available in Biddulph**
Need for additional housing stems from a number of factors, for example household formation, in-migration, linkages with future workforce, and other factors. The NPPF makes clear that housing projections are the starting point for assessing housing needs; however, these additional factors should also be taken into account in Council SHMAs. The Council's own housing need assessments are set out in its evidence base on the website. Note that this already takes into consideration empty properties in the Moorlands.
- **Lack of infrastructure (doctors etc)**
National planning guidance states that the Council should assess the quality and capacity of infrastructure to meet forecast demands. An Infrastructure Delivery Plan is being prepared which will identify the infrastructure necessary to support the Local Plan proposals. It builds on the findings of the Development Capacity Study for the Core Strategy. Consultation and work with infrastructure providers is ongoing and their feedback will inform the Infrastructure Delivery Plan and the Local Plan. The Council is working with the County Council to assess the impact of proposed development on school capacity, what additional capacity is needed and how this can be delivered.
- **Need to demonstrate exceptional circumstances to justify removal from the Green Belt**
If this site is selected as a housing allocation, exceptional circumstances will need to be demonstrated to justify its release from the Green Belt.
- **Poor marketing of consultation**
The consultation was widely publicised and included a flyer being sent to all households and businesses in the District through Royal Mail. High levels of

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responses have been received by the Council from Biddulph residents which suggests that a significant number of residents knew about the consultation.

- **Consultation period too short**
The consultation period for planning documents at statutory stages is 6 weeks. This consultation was held over a longer time period.
- **Website not easy to use**
Responding on the Council's website by using the consultation portal was an option but there were other ways of responding too – by email, completing a form or letter.
- **Sewage works over capacity**
United Utilities has a statutory duty to provide capacity for new development so this is not a valid reason for development not to come forward in Biddulph.
- **Why was Site not included at Site Options Stage?**
The Local Plan production process, by its very nature, involves several stages of consultation at which point anyone can suggest further sites for inclusion in the plan and the Council decides on whether they are appropriate. This site was suggested as part of the site options consultation.
- **No employment**
New employment areas are also proposed for Biddulph in the draft Local Plan.
- **Increase in air pollution**
If the district council considered that a development may adversely impact on local air quality then the applicant is required to undertake air quality assessments to identify these issues and develop options to mitigate these impacts. In addition the district council continually monitors air quality across the district and regularly undertakes review and assessments of this data to identify areas where the traffic could have an unacceptable impact on local air quality.
- **Use Pennine Way instead**
This area was included at Site Options Stage but not taken forward due to the impact development in this location would have on the Green Belt (refer to the Council's Green Belt Review for details).
- **Town centre needs improving**
New development will help to support the town centre shops and facilities.
- **Where will children play?**
The Council requires open space to be integrated into developments of more than 20 houses including children's play facilities unless there is already adequate provision in the local area.
- **Need smaller not larger properties**
Any development on this site would not just be larger properties. There will be an affordable housing requirement which will need to be implemented including 'starter homes' which tend to be smaller units.

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- **Agricultural land value**
The land has an agricultural classification of Grade 4 which means that it is poor quality.
- **Housing density too high**
The densities put forward are indicative at present. If the site were taken forward and the subject of a planning application the density would be an issue that anyone would have the opportunity to comment on.
- **Uncertainty over land ownership**
The Council is currently investigating land ownership issues in this area.
- **SHLAA record for site does not support inclusion**
The relevant SHLAA record, BD140, does not support development of this site giving the reasons of access and landscape character. Since the record was written, it has been established that access would not be an issue which would prevent development of the site. Recent evidence has shown that development of the site would have a high impact on landscape sensitivity. The Council must balance this evidence against all the other evidence relating to this site and reach a decision on whether or not to include it as a development site in the Local Plan.

Preferred Options Local Plan Consultation July 2017

This site was not included as a Preferred Option by the Council in July 2017.

Developer/Agent/Owner

No response received

Public Response

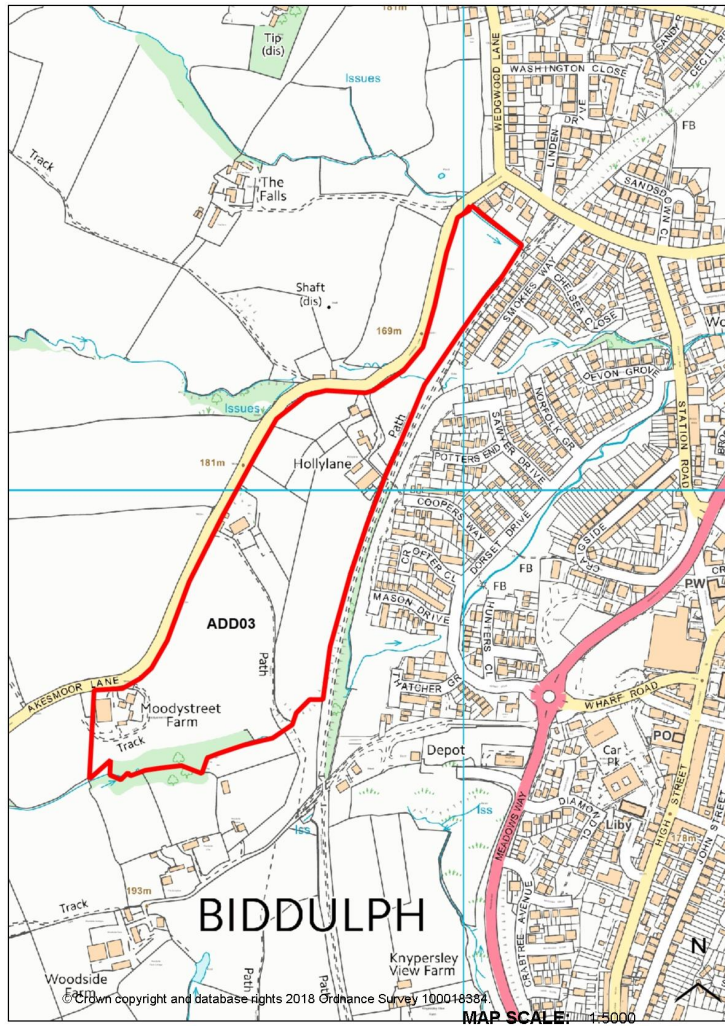
No responses received

Local Plan Publication (Submission Version February 2018)

No representations received.

Biddulph

ADD03 Off Akesmoor Lane



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Picture 10.1

ADD04 - (Objection to exclusion of site made at Submission Stage)

Biddulph

ADD04 off Mill Hayes Road

Local Plan Process

- Not included in the Options stage
- Site was suggested for consideration in the Green Belt Review
- Additional site included the Preferred Options consultation April 2016
- Not included in Preferred Options Local Plan July 2017
- Not included in Submission Version Local Plan (February 2018)

Current Position

Site not taken forward into Submission Version Local Plan as:

- An alternative Green Belt site exists adjacent to Wharf Road which will assist with bringing forward a large strategic mixed use regeneration site which is well related to the town centre and its key services and facilities.
- Harm of development to Knypersley Hall is a key issue – any harm would need strong justification.
- On planning balance the Council has concluded that the selected sites are the most appropriate solution for Biddulph and minimise Green Belt release.

Key Issues

- Green Belt – considered to be suitable for removal if exceptional circumstances are demonstrated.
- Significant impact on heritage assets – Knypersley Hall.
- High landscape sensitivity.
- Portion of southern part of site is a regionally important geological site so must be left undeveloped and may require a buffer.
- Presence of school playing fields, sports clubs and pool on site which would need to be retained.
- Access issues – For 100+ houses an access to Tunstall Road would be needed as a Mill Hayes Road access would not be adequate. The only way this could be achieved would be to go through BD117 employment / housing site.
- Ecology - Scattered mature trees in the northern area of the site, as well as pond 1, may qualify for SBI or BAS status dependent on further survey.

Site Information

Greenfield/ brownfield	Built up area boundary/ countryside	Est. housing capacity	Area (ha)	Ownership status	Site details
Greenfield	Countryside Green Belt	150	approx 4.4 (gross)	Two landowners – both will release land for development	<ul style="list-style-type: none"> • Large site to south of Biddulph • Reasonably close to services & facilities • Site close to listed Knypersley Hall

Studies

Extended Phase 1 Habitat Survey 2016

Ecus Ltd conducted Phase 1 ecological survey (incorporating Local Wildlife Site Assessment) in 2016. It concluded that the improved grassland and species-poor hedgerow habitats on site were considered of nature conservation value at the site

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level only. These habitats are not listed as important habitats in the Staffordshire SBI guidelines.

Scattered mature trees in the northern area of the site, as well as pond 1, may qualify for SBI or BAS status dependent on further survey. The trees should be further assessed to determine whether they may be considered as 'veteran' and no tree works should be carried out until a detailed bat assessment has been undertaken to determine the presence/absence of bats roosts. In the first instance, the pond should be surveyed for newts. Additional pond surveys for invertebrates and mammals would be informative.

Species recorded on site were common and widespread both at a county and national level. No species listed as important in the Staffordshire SBI guidelines were recorded (although bullfinch and jay would score on the woodland bird index) and therefore no part of the site currently qualifies for consideration as an SBI or as a BAS under these criteria. However, it is possible that further survey of the pond would reveal the presence of notable protected species (i.e. great crested newt) and / or SBAP species.

Badger, bats and reptiles may use areas of the site and further survey for these species should be undertaken prior to any future development. It would be necessary to conduct nesting bird checks before vegetation clearance or other disturbance during the bird breeding season.

Green Belt Review 2015

(Appraised sites according to their contribution to Green Belt Purposes)

Check Sprawl: limited contribution

Maintain Separation: contribution

Prevent Encroachment: limited contribution

Preserve Setting: contribution

Overall Impact on Green Belt Purposes: Moderate

This is a significant area of land which cannot be readily subdivided because of an absence of clear internal boundaries. It is well contained physically and visually by Mill Hayes Road and whilst making a contribution to Green Belt purposes in respect of separation and setting, comprehensive masterplanning (which would retain existing open space and sports pitches) could yield a development which would help to reinforce wider Green belt function. See also BD069, BD117, BD131b.

Recommendation: Consider for release

Landscape, Local Green Space & Heritage Impact Study (August 2016)

Landscape Results

Site comprises land to the west and south of Knypersley Hall, including a large, open field which slopes down from the hall in the north of the site, and more undulating land in the south of the site containing a pond and scattered trees. The site is separated from the settlement edge by Knypersley Hall and agricultural land to the north. Development of the site could adversely affect the existing settlement form, particularly in the southern extent of the site. The northern section of the site has high visual prominence, particularly when viewed from Tunstall Road.

Site is of high landscape sensitivity. Please note that this study forms part of a wider evidence base to support SMDC's Local Plan. Therefore the conclusions within

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this report will be weighed against other evidence when determining the overall suitability of a site for development.

Heritage Results

There is one Grade II* and one Grade II Listed Building within close proximity to the site. The site contributes greatly to the setting of the Grade II* as a remnant of the parkland, which in turn, contributes to the overall significance of the asset. Development on the site would highly likely cause substantial adverse effects to the setting of the Grade II* Listed Building which would impact upon its overall significance. The HEA states that development is not deemed appropriate in the HLC zone BBHECZ 7 (Historic Environment Character Assessment 2010).

Site could not be developed without substantial heritage impacts. Please note that this study forms part of a wider evidence base to support SMDC's Local Plan. Therefore the conclusions within this report will be weighed against other evidence when determining the overall suitability of a site for development.

Sustainability Appraisal

Sustainability Appraisal Submission Version June 2018

The proposed delivery of circa 1,070 dwellings is considered to have a significant positive effect, as could the site's proximity to areas of existing employment. However, the site's proximity to historic assets is likely to have a significant negative effect. The development of greenfield land indicated on the predictive map of Best and Most Versatile agricultural land as partly within an area where 20 - 60% of the land is likely to be BMV is assessed as having a negative effect.

The site is adjacent to Knypersley Hall (Grade II* Listed). The site comprises land to the west and south of Knypersley Hall, including a large, open field which slopes down from the hall in the north of the site, and more undulating land in the south of the site containing a pond and scattered trees. The southern part of the site is adjacent to a Local Geological / Geomorphological Site (LoGS). The presence of school playing fields and other recreational features would need to be addressed. Heritage and landscape impact assessments are required.

The Council's Green Belt review has recommended considering this site for release from the Green Belt if exceptional circumstances can be demonstrated.

This site was taken forward as a preferred option for consultation in April 2016.

The Extended Phase 1 Habitat Surveys and Local Wildlife Site Assessment (May 2017) considered that the improved grassland and species-poor hedgerow habitats on site were of nature conservation value at the site level only. Species recorded on site were common and widespread both at a county and national level. However scattered mature trees in the northern area of the site, as well as pond 1, may qualify for SBI or BAS status dependent on further survey. The trees should be further assessed to determine whether they may be considered 'veteran'. Assessment is required to determine the presence or absence of bats roosts and the pond should be surveyed for newts.

The site was considered by the Council's Landscape, Local Green Space and Heritage Impact Study (August 2016) to be of high landscape sensitivity. The study

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found that the site is separated from the settlement edge by Knypersley Hall and agricultural land to the north. It was considered that development of the site could adversely affect the existing settlement form, particularly in the southern extent of the site; and that the northern section of the site has high visual prominence, particularly when viewed from Tunstall Road. There is one Grade II* and one Grade II Listed Building within close proximity to the site. The site was considered by the Council's Landscape, Local Green Space and Heritage Impact Study (August 2016) which considered that the site could not be developed without substantial heritage impacts that could not be reasonably mitigated. The study found that the site contributes greatly to the setting of the Grade II* as a remnant of the parkland, which in turn, contributes to the overall significance of the asset. It was considered that development on the site would highly likely cause substantial adverse effects to the setting of the Grade II* Listed Building which would impact upon its overall significance.

The site was not proposed for inclusion in the July 2017 preferred option Local Plan.

Initial HRA Screening

No Likely Significant Effects (LSEs) have been identified in relation to the preferred option site allocations in Biddulph.

Minerals

SCC Minerals Team – no comment.

Options Consultation July 2015

The site was not included in the Options stage it was suggested for considered in the Green Belt Review and was an additional site added in at Preferred Options.

Initial responses received

Statutory bodies/stakeholders

Historic England - green belt release for housing with a possible school - It is not clear how the impact of the site allocation on the Grade II* listed building Knypersley Hall, its associated Grade II listed buildings and the setting of all, individually and cumulatively, has been considered. Further information on this is required. (Since these comments were made, a Heritage Impact Assessment of this site has been produced).

Coal Authority: Staffordshire Moorlands is an area where there have been significant coal mining activities which have left a legacy. Recommend that sites are assessed to determine if there coal related hazards which require remediation and the likely impact on mineral resources. Previous coal workings do not prevent development of sites and therefore do not wish to recommend any sites are excluded from assessment on mining legacy grounds.

United Utilities, Severn Trent, Natural England, Network Rail; no site specific comments

SCC Highways – From a highways point of view, a Transport Assessment (TA) would be required. Creation of an access directly onto the A527 is preferred. Query

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whether a suitable point could be created at the southern end (e.g. through the SMDC car park?).

Developer/Agent/Owner – The land is in multiple ownerships and owners have been contacted. Responses are awaited from most parties. (Responses from landowners were later received).

Public response - None – site was suggested for consideration in the Green Belt Review.

Council Comment

- The land in question is within the Green Belt. In order for Biddulph to accommodate new development, the Green Belt boundary will need adjustment as there are not enough sites in the existing settlement boundary to accommodate the level of development needed. The Council has recently completed a Green Belt Review in order to assess parts of the Green Belt where minor adjustments can be made without having an impact on the function of the Green Belt as a whole (as defined in government planning guidance). This study recommends considering this land for release from the Green Belt.
- Further investigations within this area have been undertaken. The land is in multiple ownerships and owners have been contacted. At the time of writing, 2 owners who own adjoining pieces of land within this area have expressed an interest in releasing their land for development. This could yield up to 150 dwellings. However, the land concerned is adjacent to Knypersley Hall, a Listed Building which may act as a capacity constraint.
- The Council is commissioning a heritage impact assessment for all the sites selected by the Council as Preferred Options for development and this work will be done under the guidance of Heritage England. The work is expected to be completed this summer and will inform the Council as to which sites are appropriate to take forward into its final draft of the plan the 'Submission Version'.
- The Highway Authority's preference is for development to be accessed from the A527, though there may be an opportunity to access a smaller proportion of development via Harlech Drive.

Preferred Options Consultation April 2016

Statutory bodies/stakeholders

United Utilities Water Limited: (Summary) With regards to site references ADD04, BD069 and BD117, these sites appear likely to discharge to that area served by Severn Trent for the provision of wastewater services. It would be useful to confirm with the respective landowners the likely point of discharge to the wastewater network from these sites so that we can confirm the receiving wastewater infrastructure and therefore better understand the impact.

Council Response

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ADD04 off Mill Hayes Road

Points of discharge to the wastewater network are a detail which can be confirmed at a later stage in the process once the sites have been allocated in the Local Plan and detailed development schemes become available at the planning application stage.

Natural England: Natural England notes the proposed preferred site for allocation in Biddulph. We note that it is located close to and/or adjoining existing areas of open space and green infrastructure. Suitable enhancements of existing open spaces' may be required together with appropriate management (and funding thereof) in order to allow these open spaces to function effectively during the local plan period. Similarly, the development of these preferred sites (if progressed) will need to include suitable multi-functional green infrastructure. Adopted local plan spatial objectives SO8 & 9 refer together with policies such as DC1 Design Considerations, DC3 landscape and settlement setting, and C3 Green Infrastructure.

Council Response

The Council has produced a Draft Green Infrastructure Strategy for consultation alongside the next draft version of the Local Plan. The strategy identifies green infrastructure corridors around the towns and lists particular issues in relation to that corridor which can be addressed as part of the relevant site policy and / or at the planning application stage. Similarly, a public open space study is underway covering all designated public open spaces in the Staffordshire Moorlands. One of the areas this will advise on is where improvements are needed to these spaces and new development in the vicinity could contribute towards this. The Council has also designated Local Green Spaces in line with criteria set out in the NPPF and the Council will seek to facilitate improvements to these areas where required.

Staffordshire County Council: ADD04 appears to partially affect a Local Geological / Geomorphological Sites (LoGS) which covers a geomorphological feature. Layout and design should avoid impacts on this feature in consultation with GeoConservation Staffordshire.

Likely to require junction and access improvements.

Council Response

Comments noted. Reference to the geological site will be included in the relevant site policy if this site is selected for development in the Local Plan.

Junction and access improvements can be incorporated into a planning application should this site be selected to take forward.

Staffordshire Wildlife Trust: Site ADD04 has not been covered by the Extended Phase 1 Habitat Surveys. (Note that this work has now been undertaken).

Historic England: Map 4.5 Biddulph - ADD04 - green belt release for housing with a possible school - It is not clear how the impact of the site allocation on the Grade II* listed building Knypersley Hall, its associated Grade II listed buildings and the setting of all, individually and cumulatively, has been considered. Further information on this is required. (Note that this work has now been undertaken).

Biddulph Neighbourhood Plan Working Group: ADD04 - Further investigation is required for this site. It needs to be put out for consultation and comments and see what is the response. It also needs to be properly defined on the map. How do you propose accessing this site? Recommendation TBD

Biddulph

ADD04 off Mill Hayes Road

Developer/Agent/Owner

No response received

Public Response

**Petition received with 114 signatures objecting to ADD04.
Plus, other individual responses.**

Issues raised:

- Exceptional circumstances for release from GB / Green Belt Review (inclusion of ADD04 is contrary to GBR)
- Use brownfield land instead
- No new infrastructure being planned in advance
- Heritage impact
- No GI Strategy exists
- No plans to develop sport and recreation in area
- Access / highways
- Not appropriate location for school
- Residential amenity for existing residents – noise from school
- Visual impact
- Loss of public footpaths
- Landscape impact
- Ecology
- Loss of hedgerows
- Site design
- Buffer needed around Knypersley Hall
- Drainage
- Air pollution
- Property values
- Parking permits needed for residents
- SHLAA id it as unsuitable
- Smaller area is poorly enclosed and incongruous
- Site in multiple ownerships
- Site did not appear in last consultation

Council Response

- **Exceptional circumstances for release from GB / Green Belt Review (inclusion of ADD04 is contrary to GBR)**
In order for Biddulph to accommodate new development, the Green Belt boundary will need adjustment as there are not enough sites in the existing settlement boundary to accommodate the level of development needed. The Council has completed a Green Belt Review in order to assess parts of the Green Belt where minor adjustments can be made without having an impact on the function of the Green Belt as a whole (as defined in government planning guidance). This study concludes that the overall impact of this area on Green Belt purposes is moderate. It states that: "This is a significant area of land which cannot be readily subdivided because of an absence of clear internal boundaries. It is well contained physically and visually by Mill Hayes Road and whilst making a contribution to Green Belt purposes in respect of

Biddulph

ADD04 off Mill Hayes Road

separation and setting, comprehensive masterplanning (which would retain existing open space and sports pitches) could yield a development which would help to reinforce wider Green belt function. It recommends considering site ADD04 for release from the Green Belt. If this site is selected as a housing allocation, exceptional circumstances will need to be demonstrated to justify its release from the Green Belt.

- **Use brownfield land instead**
Brown field sites have been considered as part of the site selection process and it is agreed that the mills in the centre of Biddulph (particularly Yarn Mill and Minster Mill) would be appropriate for residential development. Albion Mill on Station Road is too small for an allocation of its own but if it is developed it would count towards Biddulph's housing needs. The Biddulph Neighbourhood Planning Group are currently working on a Town Centre Masterplan which includes looking at opportunities for redeveloping brownfield sites.
- **Victoria Colliery and Childerplay are alternative locations for development.**
Sites at Victoria Colliery and Childerplay Road are within the Green Belt like ADD04. The Green Belt Review has considered the impact on the Green Belt the release of these sites for development would have. Only the Victoria Colliery site was identified as being suitable for consideration for Green Belt release (in exceptional circumstances). In reaching a decision on which sites to include in the Local Plan, the Council must balance evidence and Government policy.
- **No new infrastructure being planned in advance**
National planning guidance states that the Council should assess the quality and capacity of infrastructure to meet forecast demands. An Infrastructure Delivery Plan is being prepared which will identify the infrastructure necessary to support the Local Plan proposals. It builds on the findings of the Development Capacity Study for the Core Strategy. Consultation and work with infrastructure providers is ongoing and their feedback will inform the Infrastructure Delivery Plan and the Local Plan. The Council is working with the County Council to assess the impact of proposed development on school capacity, what additional capacity is needed and how this can be delivered.
- **Heritage impact**
Heritage Impact of development on the site has been assessed in the Council's Heritage Impact Study (August 2016), the results for this site are: 'There is one Grade II* and one Grade II Listed Building within close proximity to the site. The site contributes greatly to the setting of the Grade II* as a remnant of the parkland, which in turn, contributes to the overall significance of the asset. Development on the site would highly likely cause substantial adverse effects to the setting of the Grade II* Listed Building which would impact upon its overall significance. The HEA states that development is not deemed appropriate in the HLC zone BBHECZ 7 (Historic Environment Character Assessment 2010). Site could not be developed without substantial heritage impacts'. It should be noted that this study forms part of a wider evidence base to support SMDC's Local Plan. Therefore the Council will weigh this conclusion against other evidence when determining the overall suitability of the site for development.

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- **No GI Strategy exists**
The Council has produced a Draft Green Infrastructure Strategy for consultation alongside the Preferred Options Local Plan.
- **No plans to develop sport and recreation in area**
The Council is undertaking a review of open space, sport and recreation facilities which includes an updated playing pitch strategy.
- **Access / highways**
From the Highway Authority's point of view, a Transport Assessment would be required at the planning application stage. Creation of an access directly onto the A527 is preferred though a limited amount of development could be accommodated using an access onto Harlech Drive. No concerns were raised by the Highway Authority about any localised traffic problems as a result of development here.
- **Not appropriate location for school**
Staffordshire County Council are the Education Authority and they look at the need for new schools in an area as a result of development. They consider that a new first school would be needed in Biddulph to accommodate the level of new housing development currently proposed. The location of this school would not be decided until the Council has firmed up its plans as to where the new housing development will take place in the town. (There are 2 options put forward as potential locations for a new school in the Preferred Option Sites and Boundaries Consultation booklet).
- **Residential amenity for existing residents – noise from school, parking problems**
Issues such as overlooking will be assessed in detail once a site layout has been determined at the time a planning application is received and residents will have the opportunity to comment on the content of that application. Problems arising from the construction period of any works, e.g. noise, dust, construction vehicles, hours of working (covered by Control of Pollution Acts) are not material planning considerations nor is the possibility of noise from the school or parking issues.
- **Visual impact / Site Design / Buffer around Knypersley Hall**
If this area is selected for development, the scheme would be designed to take into account its setting and heritage impact as well as any infrastructure and / or site constraints. A planning application would be required before any development could take place and this would be open for anyone to comment on.
- **Loss of public footpaths**
Public footpaths can be maintained or re-directed. This issue would be considered at the planning application stage.
- **Landscape impact / smaller area is poorly enclosed and incongruous**
Landscape impact of development on the site has been assessed in the Council's Landscape Impact Study (August 2016), the results for this site are: 'Site comprises land to the west and south of Knypersley Hall, including a large, open field which slopes down from the hall in the north of the site, and

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more undulating land in the south of the site containing a pond and scattered trees. The site is separated from the settlement edge by Knypersley Hall and agricultural land to the north. Development of the site could adversely affect the existing settlement form, particularly in the southern extent of the site. The northern section of the site has high visual prominence, particularly when viewed from Tunstall Road. Site is of high landscape sensitivity. Please note that this study forms part of a wider evidence base to support SMDC's Local Plan. Therefore the Council will weigh this conclusion against other evidence when determining the overall suitability of the site for development.

- **Ecology**
Ecus Ltd conducted Phase 1 ecological survey (incorporating Local Wildlife Site Assessment) in 2016. It concluded that the habitats on ADD04 were considered to be of nature conservation value at the site level only and are not listed as an important habitat in the Staffordshire SBI guidelines. Species recorded on site were common and widespread both at a county and national level and it is considered unlikely that the site significantly supported any notable protected species. [Some predevelopment species surveys recommended].
- **Loss of hedgerows**
Wherever possible hedgerows would be incorporated into any future development scheme.
- **Drainage**
The site is not within floodplain and the Environment Agency has not commented as such. If there is an existing issue with surface water drainage then new development would need to address this. An on site SUDs (Sustainable Urban Drainage) system would be required on this site if it were to be developed.
- **Air pollution**
If the district council considered that a development may adversely impact on local air quality then the applicant is required to undertake air quality assessments to identify these issues and develop options to mitigate these impacts. In addition the district council continually monitors air quality across the district and regularly undertakes review and assessments of this data to identify areas where the traffic could have an unacceptable impact on local air quality.
- **Property values**
Property values are not considered material in planning law.
- **SHLAA identifies site as unsuitable**
The relevant SHLAA record, BD131, covers a much larger area than ADD04 and does not support development of this larger area with the main reason being constraints from existing uses in the area, particularly the sports clubs. The SHLAA will be updated to reflect this smaller area and also the fact that since the record was written, recent evidence has emerged regarding landscape and heritage constraints. The Council must balance this evidence against all the other evidence relating to this site and reach a decision on whether or not to include it as a development site in the Local Plan.

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- **Site in multiple ownerships**
The owners of ADD04 have confirmed to the Council that the land is available for development.
- **Site did not appear in last consultation**
The Local Plan production process, by its very nature, involves several stages of consultation at which point anyone can suggest further sites for inclusion in the plan and the Council decides on whether they are appropriate. This site was suggested as part of the site options consultation.
- **Uplands Mill houses not all been sold.**
The Uplands Mill housing site has been taken into account in calculating Biddulph's housing needs.
- **Develop in Stoke instead.**
National planning guidance states that the Council should seek to meet the development needs of their area. Stoke and Newcastle Councils have their own development needs to meet.

Preferred Options Local Plan Consultation July 2017

This site was not included as a Preferred Option by the Council in July 2017.

Developer/Agent/Owner

None received

Public Responses

None received

Local Plan Publication (Submission Version February 2018)

Site suggested as a residential site.

Council Response

ADD04 was included in the Preferred Sites and Boundaries Consultation Booklet, published in 2016. It was suggested for inclusion in the consultation responses to the previous consultation in 2015.

The two main reasons why it was not included in the Preferred Options Local Plan (2017) are that the site adjacent to Wharf Road (BDNEW) is considered to be preferable due to its more central location and to help bring forward the rest of the Wharf Road site for redevelopment. Also, the potential harm to Knipersley Hall identified in the Council's Historic Impact Assessment. Additionally, the site is of high landscape sensitivity.

Knipersley Hall is a Grade II* Listed Building. Recent conversions on the site have made no difference to this status. National planning policy contains strict guidelines requiring the Council to avoid harm to heritage assets unless there are exceptional circumstances. The Council's Heritage Impact Assessment concludes that the whole of ADD04 "could not be developed without substantial heritage impacts."

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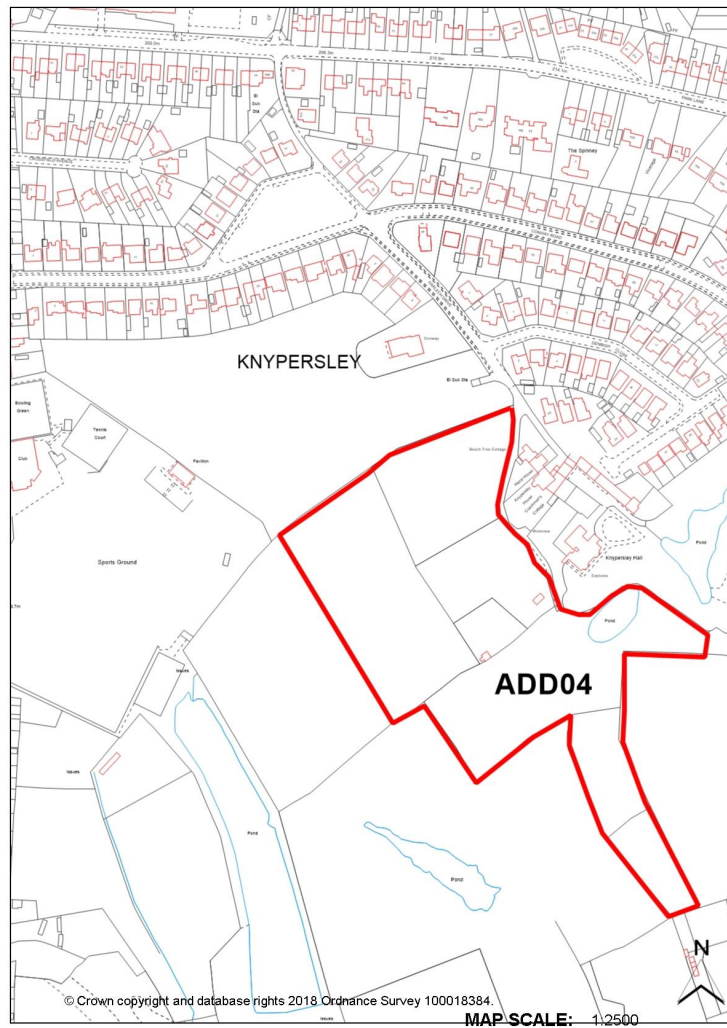
ADD04 off Mill Hayes Road

The Council's Green Belt Review assesses the land as part of a wider parcel consisting of the whole area north of Mill Hayes Road. The study considers that the land cannot be readily sub-divided because of an absence of clear internal boundaries. Whilst it recommends that the whole area is considered for release from the Green Belt, exceptional circumstances would still need to be demonstrated.

Objections from earlier stages covered a whole range of issues – not just a possible new first school.

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ADD04 off Mill Hayes Road



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Picture 10.2

BD062 - (Objection to exclusion of site made at Submission Stage)

Biddulph

BD062 Land north of York Close & Essex Drive

Local Plan Process

- Site from the SHLAA
- Included in the options consultation July 2015
- Included in the Preferred Options consultation April 2016
- Not included in Preferred Options Local Plan July 2017
- Not included in Submission Version Local Plan (February 2018)

Current Position

Site not taken forward into Submission Version Local Plan as:

- An alternative Green Belt site exists adjacent to Wharf Road which will assist with bringing forward a large strategic mixed use regeneration site which is well related to the town centre and its key services and facilities.
- On planning balance the Council has concluded that the selected sites are the most appropriate solution for Biddulph and minimise Green Belt release.

Key Issues

- Green Belt site – suitable for release if exceptional circumstances are demonstrated.
- Adjacent to a United Utilities operational Waste Water Treatment Works - in their representations to the Submission Version Local Plan United Utilities state that it “wishes to reiterate its preference for sensitive uses such as residential to be located away from our existing operational infrastructure. This is particularly relevant to our wastewater treatment works which are key operational infrastructure”.
- Agent has supplied an Odour Assessment study which United Utilities consider acceptable. It recommends excluding a small portion of site at north from development and using as open space). SMDC Environmental Health had some issues with this study but developer has provided a document which addresses these concerns to the satisfaction of officers.
- Noise report received from agent.
- No adverse landscape or heritage impacts associated with development of site.
- Proposed site does not include any land in Flood Zone 2.
- Ecology - further survey work would be required on trees (potential for bat roost) and a reptile survey in order to establish SBI/BAS status.
- Layout plan showing how 35 houses could be accommodated on site received from agent.

Site Information

Greenfield/ brownfield	Built up area boundary/ countryside	Est. housing capacity	Area (ha)	Ownership status	Site details
Greenfield	Outside the settlement boundary in the Green Belt	35* (approx. 25 dwellings per ha)	1.2	Owner supports development	<ul style="list-style-type: none"> • Overgrown site • Mature trees • PROW on western part of the site • Access from York Close • Adjacent to United Utilities water treatment works

*Figure reflects requirements of owner's odour study

Biddulph

BD062 Land north of York Close & Essex Drive

Studies

Agent acting on behalf of landowner has submitted:

- Extended Phase 1 Habitat Report
- Highways Report
- Odour Assessment
- Noise Report

Green Belt Review 2015

(Appraised sites according to their contribution to Green Belt Purposes) Assessed with BD068

Check Sprawl: Limited contribution

Maintain Separation: Limited contribution

Prevent Encroachment: Limited contribution

Preserve Setting: Contribution

Overall Impact on Green Belt Purposes: Limited

These sites are connected though their enclosure to the north by Marsh Green Road, as such they are effectively part of the built envelope of Biddulph in this location and notwithstanding the presence of a sewage treatment works between the sites could be developed without impinging on the wider Green Belt either physically or visually.

Recommendation: **Consider for release**

Extended Phase 1 Habitat Survey 2015 (FID 122)

The site has potential for protected species to be present due to the mosaic of habitats and habitat structure present, especially as the site is well connected to the wider countryside. Therefore, the site is not recommended for potential development as the site is deemed to have ecological importance. The following surveys/ actions are therefore recommended prior to any potential development works being carried out:

- Bat survey of the 2 trees with bat roosting potential
- Reptile survey
- Adoption of Himalayan balsam removal regime
- Vegetation removal at the appropriate time of year

Local Wildlife Assessment (ECUS, 2016)

Lockwood Hall Associates consider the site habitats to be considered to be of nature conservation value at district level and have the potential to support bats and reptiles, which could allow the consideration of the site as an SBI or BAS.

The following surveys/ actions are therefore recommended in order to establish SBI/ BAS status:

- Assessment of the 2 trees for their potential to support roosting bats.
- Reptile survey required.

Landscape, Local Green Space & Heritage Impact Study (August 2016)

Landscape Results

Site is located within the north of Biddulph, east of the dismantled railway line, and comprises an area of rough grassland and scrub. The site is enclosed by residential development to the south and west, and a sewage treatment works to the north-east, resulting in low visual prominence. Although the adjacent settlement edge is well-defined, it is urban in character to the south of the site. Existing vegetation on the

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BD062 Land north of York Close & Essex Drive

north-eastern site boundaries would form a vegetated settlement edge, and therefore this vegetation should be retained and strengthened where necessary.

Site is of low landscape sensitivity.

Heritage Results

There are three Grade II Listed Buildings within the 400m buffer. The site was enclosed by surrounding vegetation and there is no intervisibility between the site and the assets. Development would be highly unlikely to adversely affect the settings of the assets. Development would be highly unlikely to adversely affect HLC zone BBHECZ 8 (Historic Environment Character Assessment 2010).

Site suitable for development in heritage terms.

Sustainability Appraisal

Sustainability Appraisal Submission Version June 2018

The proposed delivery of circa 40 dwellings should have a significant positive effect. The site is also accessible to existing services facilities and areas of employment which is likely to have a positive effect. However, the site's ecological importance due to the potential for protected species to be present and its connection to the wider countryside are considered to have a significant negative effect. Similarly, the development of greenfield land (indicated on the predictive map of Best and Most Versatile agricultural land as urban / industrial) and the site's proximity to historic assets are also assessed as having a negative effect.

Site is located within the north of Biddulph, east of the dismantled railway line (Biddulph Valley Way), and comprises an area of rough grassland and scrub. The site is enclosed by residential development to the south and west, and a sewage treatment works to the north-east, resulting in low visual prominence.

The Extended Phase 1 Habitat Surveys and Local Wildlife Site Assessment (May 2017) considered that the species poor semi improved grassland, scattered scrub, dense scrub, tall ruderal vegetation are common and widespread habitats both locally and nationally and are not listed as important habitats in the Staffordshire SBI guidelines. Assessment of the two trees for their potential to support roosting bats and a reptile survey are required.

The Council's Green Belt review has recommended considering this site for release from the Green Belt if exceptional circumstances can be demonstrated. The potential landscape and ecological impacts of development require further assessment.

This site was taken forward as a preferred option for consultation in April 2016.

There are three Grade II Listed Buildings within the 400m buffer. The site was considered by the Council's Landscape, Local Green Space and Heritage Impact Study (August 2016) which notes that it is enclosed by surrounding vegetation and that there is no inter-visibility between the site and the assets; development was considered highly unlikely to adversely affect the settings of the assets.

The site was considered by the Council's Landscape, Local Green Space and Heritage Impact Study (August 2016) to be of low landscape sensitivity. Although the adjacent settlement edge is well-defined, it is urban in character to the south of the site. The study found that existing vegetation on the north-eastern site boundaries

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BD062 Land north of York Close & Essex Drive

would form a vegetated settlement edge, and considered that this vegetation should be retained and strengthened where necessary.

The site is adjacent to United Utilities water treatment works - master-planning may be required in order to mitigate the risk of odour and noise nuisance. The Council's 2015 Phase 1 habitat survey noted that the site has potential for protected species to be present due to the mosaic of habitats and habitat structure present, especially as the site is well connected to the wider countryside. Any masterplan should also demonstrate how a development scheme will address the site's potential ecological value and contribute to the priorities and actions proposed for the Biddulph strategic GI corridor (as set out in the Green Infrastructure Strategy), including by supporting public access on to the Biddulph Valley Way.

The site was not proposed for inclusion in the July 2017 preferred option Local Plan.

Initial HRA Screening

No Likely Significant Effects (LSEs) have been identified in relation to the preferred option site allocations in Biddulph.

Minerals

In Mineral Safeguard Area for 'Superficial Sand and Gravel'. Any application should be accompanied by a Mineral Safeguarding Statement. Developers should take account of the requirements of Policy SD1 (5) and investigate the potential for using in-situ minerals in construction works.

Options Consultation July 2015

Statutory bodies/stakeholders

Historic England: Made no comments on individual sites recommended that a heritage impact assessment of sites is carried out. (This work has now been completed).

Environment Agency; Site not identified as being in an area likely to be affected by flooding. Need to have regard to the relevant River Basin Management Plan.

Coal Authority: Staffordshire Moorlands is an area where there have been significant coal mining activities which have left a legacy. Recommend that sites are assessed to determine if there coal related hazards which require remediation and the likely impact on mineral resources. Previous coal workings do not prevent development of sites and therefore do not wish to recommend any sites are excluded from assessment on mining legacy grounds.

United Utilities, Severn Trent, Heritage England, Natural England, Network Rail; no site specific comments

SCC Highways - Extensions of York Close and Essex Drive would be acceptable for 40 dwellings.

Developer/Agent/Owner - Land ideally suited for development as part of Green Belt Review, has support from Planning Inspector who conducted Core Strategy examination, land does not make a significant contribution to Green Belt and its

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BD062 Land north of York Close & Essex Drive

deletion would not harm function of Green Belt. Land is available and development is achievable for around 35 dwellings taking into account constraints. Highway Authority has no objections to the site being developed, site has good pedestrian connectivity via York Close / Essex Drive and the Biddulph Valley Way, Phase 1 Habitat Survey undertaken confirming site has little ecological significance, an Ecological Mitigation Strategy can address any issues / improvements, site is Flood Zone 1, odour assessment has been commissioned.

Public response 56 comments plus petition with 89 signatures – all objecting.
Issues raised:

Objections

- Infrastructure - Schools oversubscribed - Oxhey First School, Woodhouse Academy.
- Infrastructure - Traffic / Transport - difficult access, surrounding roads not large enough to cope with additional traffic including HGVs, construction traffic and emergency vehicles, Essex Drive / York Close are narrow and crowded with parked cars, Essex Drive steep so impassable for most vehicles in icy weather, highway safety - Well Lane, lack of pavements on Mow Lane and junction with Congleton Road not ideal, need Transport Study, concern about additional traffic around schools and impact on safety.
- Infrastructure - Other - lack of local amenities, could sewerage system cope with all new development? Public transport northwards finishes at 6pm. Current deficit in public open space and severe deficit in children's play areas.
- Landscape
- Nature Conservation - foxes, ducks, badgers, owls, rabbits, kingfishers, hawks (and many other bird varieties), badgers, bats, bees - disagree with results of agent's Phase 1 Habitat survey
- Flood Risk on east side of site & concerns about surface water as a result of new development (photograph supplied), surface water will find its way into sewerage system which cannot cope at present due to design / construction of town sewer causing flooding in Gillow Heath - United Utilities say this cannot be solved without considerable funds.
- Amenity (e.g. noise, privacy, loss of light - oppressive impact on existing development including Beaumont Close, out of character with area)
- Scale of development - 40 dwellings is excessive (along with other sites earmarked in this area)
- Government Policy - not in line with NPPF - Green Belt Land - Brownfield sites should be a priority
- Other - Previous planning refusal on the site, site too close to sewage works - existing noise and odour and potential pollution from gases, high concentration of sewage pipes would make land difficult to build on - query economic viability, works are not heavily screened - can be seen in winter, well used public footpath crosses site, loss of mature trees, could residents obtain home insurance due to flooding? Sites closer to the town centre with better access should be used (e.g. Meadows School), no employment in Gillow Heath so new residents will be commuting creating a dormitory town, lack of market demand for houses, Town Centre is declining - shops are closing, need for new houses / flats in town centres, existing empty properties in town centres, contradicts Council's Core Strategy (point 2.3) and NPPF Green Belt section, object to social housing, SHLAA form not clear, poor consultation - should notify affected residents personally, difficult for people to understand some of technical language in documents and on response form, background documents submitted by

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BD062 Land north of York Close & Essex Drive

landowners / agents to support SHLAA forms should be publicly available. Query accuracy of population growth figures as they are nationally produced and not locally.

Council response –

The District Council is working with the County Council on the issue of school capacity. The County has determined that additional school provision would be required to support housing growth at the Primary phase of education. At this early stage in the site selection process there are a number of options for delivering school capacity dependant on the sites selected to take forward.

- The Highway Authority has no difficulties with this development from their point of view. Cumulative impact of several developments in this area would be assessed through a TA.
 - New development is the main way to deliver new or improved infrastructure e.g. more residents may support an improved bus service. Infrastructure needs specifically related to a new development will be provided as part of that development e.g. children's play areas.
 - United Utilities has advised that if appropriate measures for surface water disposal are included within development schemes then there should be no detrimental impact on the capacity of their infrastructure.
 - An odour assessment of the sewage works has been undertaken on behalf of the landowner and it concludes that the vast majority of the site immediately adjacent to the works (BD062) is suitable for residential use and odour issues should not be viewed as a constraint to planning consent.
 - The land in question is not highlighted as significant in the Council's Landscape & Settlement Setting Assessment. A Landscape & Visual Impact Assessment will be undertaken during the plan production process and look at all preferred option sites suggesting mitigation measures where appropriate. The results will be incorporated into the Submission Version of the Local Plan.
- The Council has recently completed a Phase 1 Ecological Study for the District. This assessed sites included in the Site Options consultation. The site survey results will be used as part of the site selection process. Any other sites which come forward and are potentially suitable for development will also need to be assessed.
- The Council has recently completed a Level 1 Strategic Flood Risk Assessment for the District, the results of which are being used to inform the site selection process.
 - Amenity – issues such as overlooking, screening and other impacts on existing residents will be assessed in detail once a site layout has been determined at the time a planning application is received and residents will have the opportunity to comment on the content of that application.
 - It is not considered that development of this particular site would be out of proportion with its surroundings and it is very unlikely that all the sites put forward in the consultation for Gillow Heath will be selected as preferred options. Any new development taking place will be subject to design policies contained within the new Local Plan – which will be subject to public consultation next year.

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- The land in question is within the Green Belt. In order for Biddulph to accommodate new development, the Green Belt boundary will need adjustment as there are not enough sites in the existing settlement boundary to accommodate the level of development needed. The Council has recently completed a Green Belt Review in order to assess parts of the Green Belt where minor adjustments can be made without having an impact on the function of the Green Belt as a whole (as defined in government planning guidance). This study recommends considering site BD062 for release from the Green Belt.
- The SHLAA has assessed more than 150 sites in and around Biddulph including brown field sites and these have been included as allocations where they are suitable, available and deliverable. However, there is not enough brownfield land to meet the town's requirements so green field sites also need to be included. Prioritising brown field land over greenfield in all circumstances is not part of Government policy.
- The previous planning history of a site, particularly from over 20 years ago (1991 in this case) is not a good indicator as to whether a site is acceptable at this time as circumstances and policies will have changed over time.
- The landowner's agent has indicated that the site is viable for housing development.
- Public footpaths can be maintained or re-directed. A link between the area and the Biddulph Valley Way will be maintained.
- New employment land is proposed at the south of the town (BD117). New investment in the town would have knock-on positive effects for the town centre. National population figures are the starting point for assessing an area's objectively assessed housing needs – this is standard practice. The new Local Plan will cover a period to 2031 so lack of demand (perceived or actual) at one point in time is not a valid reason for not meeting the area's objectively assessed housing needs. The Council's evidence demonstrates a need for affordable housing in Biddulph and this is reflected in local policy (set out in the Core Strategy). The Council is required to seek to address this need.

Preferred Options Consultation April 2016

Statutory Bodies / Stakeholders

United Utilities

We wish to emphasise the need to carefully consider the allocation of new housing sites in close proximity to our wastewater treatment works. In this regard we note that our wastewater treatment works (WwTW) in your local authority include: Biddulph WwTW; Biddulph Park WwTW; and Flash WwTW. We wish to highlight that a wastewater treatment works can result in emissions which include odour and noise. Therefore if you are considering any sites for new allocations, especially housing allocations, near to a wastewater treatment works, you should carefully consider the sites with your Environmental Health colleagues. This is important when comparing sites close to treatment works with potential alternative sites that may be available to you for allocation. This reflects our earlier correspondence to you. The position of

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United Utilities is that when considering a range of sites to meet housing needs, it would be more appropriate to identify new housing sites, which are sensitive receptors, that are not close to a wastewater treatment works. We note this point is particularly relevant to your assessment of sites considered for allocation in Biddulph as part of the current Preferred Options Sites and Boundaries consultation. In particular, site references BDO68, BDO62 and BDO87, which are sited in close proximity to Biddulph Wastewater Treatment Works. Notwithstanding this preference, if it is still intended to progress with the allocation of sites near to a wastewater treatment works for housing following discussions with your Environmental Health colleagues, we strongly recommend that your decision should be informed by: 1. an odour impact assessment; and 2. a noise assessment. If after having undertaken these assessments you still allocate land near to the wastewater treatment works for housing, we recommend that there should be detailed associated policy which identifies the need for mitigating measures including any that may be identified as a result of the assessments. We recommend that: 3. careful masterplanning is always prudent in order to mitigate the risk of odour and noise nuisance. For example, any on-site open space should be located so as to act as a buffer between the treatment works and any newly introduced housing. In addition the houses could be orientated so to most appropriately manage the impact of noise; and 4. appropriate soft landscaping is included to strengthen the buffer between the treatment works and the proposed new development.

Further United Utilities Comments May 2017

With respect to any flooding implications, United Utilities wishes to recommend:

1. The need for foul only flows. Surface water should discharge to a more sustainable alternative than the public sewer; and
2. In advance of submitting the application and once more details are known in respect of the proposed development, the applicant should engage in pre-application discussions with United Utilities so that the most appropriate point of connection to the public sewer can be determined for foul water. The point of connection that is agreed for foul water may then be subsequently specified in any planning conditions recommended to the local planning authority.

Council Response

Comments noted.

An Odour Assessment has been produced by the land owner. Since these comments were sent to the Council, United Utilities has agreed that the issue of odour has been effectively addressed in the land owner's odour report. "Further to recent correspondence, United Utilities does not require any further odour impact work subject to the inclusion of the buffer you have proposed in your email of 5 December 2016 and the inclusion of appropriate landscaping boundary treatments."

The developer considered that no noise report was necessary.

It is now up to the Council to balance the planning issues in determining whether to select this site for development in the Local Plan.

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Detailed associated policy for the site will be included in the Local Plan if it is selected and it is acknowledged that careful master planning of the site will be required including appropriate screening /buffering. Similarly, the recommendations above will be incorporated into policy should the site be taken forward.

Natural England

Natural England notes the proposed preferred site for allocation in Biddulph. We note that it is located close to and/or adjoining existing areas of open space and green infrastructure. Suitable enhancements of existing open spaces' may be required together with appropriate management (and funding thereof) in order to allow these open spaces to function effectively during the local plan period. Similarly the development of these preferred sites (if progressed) will need to include suitable multi-functional green infrastructure. Adopted local plan spatial objectives SO8 & 9 refer together with policies such as DC1 Design Considerations, DC3 landscape and settlement setting, and C3 Green Infrastructure.

Council Response

The Council has produced a Draft Green Infrastructure Strategy for consultation alongside the next draft version of the Local Plan. The strategy identifies green infrastructure corridors around the towns and lists particular issues in relation to that corridor which can be addressed as part of the relevant site policy and / or at the planning application stage. Similarly, a public open space study is underway covering all designated public open spaces in the Staffordshire Moorlands. One of the areas this will advise on is where improvements are needed to these spaces and new development in the vicinity could contribute towards this. The Council has also designated Local Green Spaces in line with criteria set out in the NPPF and the Council will seek to facilitate improvements to these areas where required.

Staffordshire Wildlife Trust

Site BD062 contains potentially high value areas of habitat and needs to be assessed against the current Staffordshire Local Wildlife Site criteria. The site also would have a 'stepping stone' role as it is adjacent to the Biddulph Brook corridor, a key green corridor through the urban areas of Biddulph that links to the wider countryside. The Extended Phase 1 Habitat Survey (site FID 122) reports that: 'The site is very well connected to other biodiverse habitats through hedgerows, scrub, broadleaved woodland and running water, which accentuates the value of the site. The site itself consists of a potentially biodiverse woodland/ scrub habitat mosaic. The importance of this site is notable as it contains a range of habitat structures of different heights.' Flora species recorded included tufted hair grass, soft rush, ribwort plantain and orchid species (unidentified due to season), which indicate that parts of the site have botanical interest. In addition The Extended Phase 1 Habitat Report dated 27th June 2014 by Leigh Ecology Ltd on behalf of Seabridge Developments (available publically as part of a submitted planning application) found a small marshy area on the site which contained 'yellow flag iris *Iris pseudacorus* , and sedge species and two orchid species, common spotted orchid *Dactylorhiza fuchsia* and southern marsh orchid *Dactylorhiza praetermissa*. ' Dogwood *Cornus sanguinea* is present on the site, and if not planted, is unusual to find, indicating semi-natural habitat. Several bird species were recorded, including priority species Dunnock and Starling. We also support the comments made by Mrs Angie Turner BSc MSc on this site.

Council Response

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Lockwood Hall Associates consider the site habitats to be of nature conservation value at district level and have the potential to support bats and reptiles, which could allow the consideration of the site as an SBI or BAS.

The following surveys/ actions are therefore recommended in order to establish SBI/ BAS status:

- Assessment of the 2 trees for their potential to support roosting bats.
- Reptile survey required.

Environment Agency

2 sites in Biddulph are adjacent to the same watercourse. There is a floodplain extent on the western boundary but this is poorly defined at present. A level 2 assessment will be required for these.

Council Response

The site boundary has been amended to exclude land within Flood Zone 2 at the request of the landowner, who does not own this land and is not promoting it for development. This approach has been agreed with the Environment Agency since their response to the consultation so a Level 2 Flood Risk Assessment is no longer required for the site.

Developer/Agent/Owner

We represent our clients who owns land north of York Close and Essex Drive, Gillow Heath, Biddulph that is identified as BD062 on the Site Options Consultation. Green Belt - Our client was previously represented by McDyre & Co who submitted representations on the Core Strategy and also gave evidence at the Examination in Public. You will have a copy of that representation is on your file, but for the sake of completeness, another copy is attached. You will note that my client has consistently argued that there is a need to review the Green Belt to meet housing need in the Plan period and beyond and also that my client's land is ideally suited to contribute towards that need. The Council has acknowledged that it will be necessary to review the Green Belt to meet its housing needs, including around Biddulph. In this respect, we would draw your attention to paragraph 70 of the Inspectors Report on the Core Strategy when he stated: "A slightly different scenario is provided by suggestions for sites, such as that at Gillow Heath in the vicinity of Biddulph. Here, as I saw during my visits to the area, there are sites currently within the Green Belt designation which could form the basis for small urban extensions which Policy SS5b indicates [MM24] will be identified as part of a comprehensive review of the Green Belt around Biddulph through the Site Allocations DPD and review of the Core Strategy..." (emphasis added) As can be noted, having visited the Gillow Heath area, the Inspector gave a clear indication that my client's land would represent a potentially appropriate housing extension to the urban area. Green Belt The Green Belt Review Study (November 2015) has assessed the value of Site BD062 and the adjoining land to the east (BD068) in terms of the main purposes of Green Belt and has concluded as follows: · Check Sprawl – Limited Contribution · Maintain Separation – Limited Contribution · Prevent Encroachment – Limited Contribution · Preserve Setting – Contribution The Study concludes that the overall impact of developing these two sites on the Green Belt purposes is 'LIMITED' and that "these sites are connected though their enclosure to the north by Marsh Green Road. As such they are effectively part of the built envelope of Biddulph in this location and notwithstanding the presence of a sewage treatment works between the sites could be developed without impinging on the wider Green Belt either physically or visually." We concur with the findings of the Study and we suggest that its deletion will not harm the function of the Green Belt in the wider area. Deliverability and Potential

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Development Capacity My client owns the site and the Registered Title extends up to the adopted highway at the end of York Close and Essex Drive. There are sewer easements over the land, but these can readily be accommodated within any future development on this relatively level site, which is also not affected by the more steeply sloping contours affecting land to the east. The site is available and achievable and we maintain that it is suitable to accommodate up to 40 dwellings, having regard to all known constraints including: the triangular shape of the site; existing sewer easements; the informal/non-statutory path that links from the southern boundary to the footpath and housing to the west; strong boundary tree cover to the east; and the proximity of the sewage works to the north-east.

Transportation We note that the Highway Authority has no objection to a development of up to 40 dwellings served off York Close, presumably in line with Manual for Streets, which of course, post-dates any earlier guidance and/or planning history that might be referred to in order to raise objection to this excellent housing site option. An initial Highways Report has been undertaken and is attached. The Report confirms that a proposed development of up to 40 dwellings can be achieved by safe means of access design that complies with the technical standards adopted by Staffordshire Moorlands and in accordance with Manual for Street Design guide. It also demonstrates that the traffic associated with a development of up to 40 dwellings, can safely be accommodated onto the local highway network. The existing peak time traffic flows currently operate well below their theoretical capacity, meaning that a development of up to 40 dwellings would have a very little impact on the local highway network and would not constitute severe impact to warrant refusal as stated in the NPPF. The site can be accessed by both walking and cycling and therefore provides alternative modes of transport opportunities to the car to access the local schools and amenities. There are also public transport services that operate from Congleton Road (A527) and the surrounding area within a very short walking distance of the proposed development. Overall it can be concluded that the site is very sustainable and offers a wide range of alternative modes of transport locally. The Report notes that the National Planning Policy Framework states that, "Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe". It concludes that overall, the proposed development does not produce a residual cumulative impact on the road network and is considered acceptable in transport terms. The site is located in a sustainable location and would therefore deliver a highly sustainable small scale graft onto the existing urban area. In the circumstances, the proposed access, to serve the application site off York Close, the surrounding priority junctions and footway connectivity can safely accommodate all vehicular and pedestrian movements and so is rightly considered by the Highway Authority as a potentially acceptable allocation for residential use. Ecology An Extended Phase 1 Habitat Survey was undertaken in June 2014 and this confirmed that the site holds little ecological significance and any potential impacts arising from its future development can be minimised and enhancements to local bio-diversity can be achieved through an Ecological Mitigation Strategy to be formulated in due course. The site has recently been re-surveyed and assessed and latest report completed this month (June 2016) and attached herewith, also confirms that: "The habitats on site provided limited potential for use by reptile species. Although suitable reptile habitat within the site is limited in extent, it is recommended that a precautionary approach is followed, with a method statement prepared that details the actions required to reduce the risk to common reptiles (if present) being injured as a result of the works." (§1.11) Flood Risk The site is shown on the Environment Agency Flood Map as being Flood Zone 1 (e.g. not liable to flood). It is envisaged that the foul water will discharge into nearby mains and the surface water can either be to soakaways, or attenuated to discharge at an agreed

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green field run-off rate into the adjacent watercourse. Odour An Odour Assessment has been undertaken and is attached. This confirms that the nearby Treatment Works have not generated objection and that all but the very northern tip of the site (which could be open space) is suitable for residential development. The findings of the report do not materially reduce the capacity of the site to accommodate between 35-40 dwellings. Conclusion The site is of only 'limited' value in terms of fulfilling the purposes of Green Belt and it is clear that there are no physical (ownership, easement and topography) technical (highways and flood risk and drainage), or environmental (landscape, ecology, trees and proximity to the nearby treatment works) constraints to prevent the development of the site for up to 40 dwellings. In summary, this site is suitable, achievable and capable of delivering a sustainable modest scale of residential environment in keeping with the adjoining urban area and without detriment to the wider surroundings. In the circumstances, we fully endorse the site option BD062 which is immediately available and capable of delivering new homes at the earliest available opportunity.

Public Response

The following issues were raised:

- Inadequate highway network.
- Noise and odour, existing raw sewage flooding, capacity of sewage works.
- This site will deliver too few homes to add a measurable contribution to the Community Infrastructure Levy (CIL), it will not bring any direct benefit to the community of Gillow Heath.
- Site is in Flood Zone 2.
- Flooding (general).
- Lack of education infrastructure.
- Victoria Colliery and Childerplay are alternative locations for development.
- Ecological interest on site.
- No exceptional circumstances for loss of GB demonstrated.
- No community benefit of developing site.
- Loss of link through site to Biddulph Valley Way.
- Site should be allocated as Visual Open Space.
- Site's inclusion contradicts with Core Strategy Policy SS5b.
- Site is in the Green Belt.
- Residents have enjoyed unrestricted public access to the site for a long time.
- Need site screening from sewage works.
- Use derelict buildings in Biddulph instead.
- Develop in Stoke instead.
- No Green Infrastructure Strategy is in place.
- Object to heritage impact.
- Object to landscape impact.
- Lack of employment in Biddulph.
- Infrastructure could not cope.
- Site should be designated as public open space.
- Amenity issues.
- Marketing of the consultation.
- Property values.

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- **Inadequate highway network.**
The Highway Authority has no difficulties with this development from their point of view. Cumulative impact of several developments in this area would be assessed through a Transport Assessment.
- **Noise and odour, existing raw sewage flooding, capacity of sewage works.**
United Utilities has a statutory duty to provide capacity for new development so this is not a valid reason for development not to come forward in Biddulph. United Utilities considers that there is no need to expand the treatment works in the development plan period for the growth identified in the development plan. Current issues experienced by residents in regard to raw sewage flooding are a separate matter to be investigated by United Utilities. An odour assessment has been undertaken which demonstrates that the site could be developed without adverse impact on future residents.
- **This site will deliver too few homes to add a measurable contribution to the Community Infrastructure Levy (CIL), it will not bring any direct benefit to the community of Gillow Heath.**
New housing development would make a contribution towards Biddulph's housing needs.
- **Site is in Flood Zone 2.**
The site boundary can be amended to exclude land within Flood Zone 2 at the request of the landowner, who does not own this land and is not promoting it for development. This approach has been agreed with the Environment Agency since their response to the consultation so a Level 2 Flood Risk Assessment is no longer required for the site.
- **Flooding (general).**
The part of the site within Flood Zone 2 has now been removed from the site boundary.
- **Lack of education infrastructure.**
Education - The District Council is working with the County Council on the issue of school capacity. The County has determined that additional school provision would be required to support housing growth at the Primary phase of education. At this early stage in the site selection process there are a number of options for delivering school capacity dependant on the sites selected to take forward.
- **Victoria Colliery and Childerplay are alternative locations for development.**
Sites at Victoria Colliery and Childerplay Road are within the Green Belt like BD062. The Green Belt Review has considered the impact on the Green Belt the release of these sites for development would have. Only the Victoria Colliery site was identified as being suitable for consideration for Green Belt release (in exceptional circumstances). In reaching a decision on which sites to include in the Local Plan, the Council must balance evidence and Government policy.
- **Ecological interest on site.**

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The Council's Phase 1 Habitat consultants consider the site habitats to be of nature conservation value at district level and have the potential to support bats and reptiles, which could allow the consideration of the site as an SBI or BAS. Further survey work would need to take place prior to any development to establish Site of Biological Importance (SBI) / Biodiversity Alert Site (BAS). Prior to any development an assessment would be required of the 2 trees for their potential to support roosting bats and a reptile survey.

- **No exceptional circumstances for loss of GB demonstrated.**
If this site is selected as a housing allocation, exceptional circumstances will need to be demonstrated to justify its release from the Green Belt.
- **No community benefit of developing site.**
Site BD062 will be required to provide a percentage of affordable housing / starter homes to benefit those in the community needing affordable housing.
- **Loss of link through site to Biddulph Valley Way.**
If this site were to be developed, the developer would be required to maintain a public access on to the Biddulph Valley Way.
- **Site should be allocated as Visual Open Space.**
The site is not recommended for designation as Local Green Space in the Landscape, Local Green Space and Heritage Impact Study (2016). Local Green Space supersedes the Visual Open Space designation (which is an old designation not supported by Government policy in the NPPF).
- **Site's inclusion contradicts with Core Strategy Policy SS5b.**
No contradiction with SMDC Core Strategy Policy SS5b 'Biddulph Area Strategy'. Sites within the urban area and an extension to the urban area are included as well as extensions in the Green Belt identified as part of the Green Belt Review as stated in the policy.
- **Site is in the Green Belt.**
In order for Biddulph to accommodate new development, the Green Belt boundary will need adjustment as there are not enough sites in the existing settlement boundary to accommodate the level of development needed. The Council has completed a Green Belt Review in order to assess parts of the Green Belt where minor adjustments can be made without having an impact on the function of the Green Belt as a whole (as defined in government planning guidance). This study recommends considering site BD062 for release from the Green Belt.
- **Residents have enjoyed unrestricted public access to the site for a long time.**
The land is privately owned and has a footpath across it linking to Biddulph Valley Way.
- **Need site screening from sewage works.**
Screening would be required as part of any new development.
- **Use derelict buildings in Biddulph instead.**
Brown field sites have been considered as part of the site selection process and it is agreed that the mills in the centre of Biddulph (particularly Yarn Mill

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and Minster Mill) would be appropriate for residential development. Albion Mill on Station Road is too small for an allocation of its own but if it is developed it would count towards Biddulph's housing needs. The Biddulph Neighbourhood Planning Group are currently working on a Town Centre Masterplan which includes looking at opportunities for redeveloping brownfield sites.

- **Develop in Stoke instead.**
National planning guidance states that the Council should seek to meet the development needs of their area. Stoke and Newcastle Councils have their own development needs to meet.
- **No Green Infrastructure Strategy is in place.**
A Green Infrastructure Strategy for the Staffordshire Moorlands has been produced by the Council with assistance from partners such as the Staffordshire Wildlife Trust and will be published alongside the next Preferred Options consultation.
- **Object to heritage impact.**
Heritage Impact of development on the site has been assessed in the Council's Heritage Impact Study (August 2016), the results for this site are "There are three Grade II Listed Buildings within the 400m buffer. The site was enclosed by surrounding vegetation and there is no intervisibility between the site and the assets. Development would be highly unlikely to adversely affect the settings of the assets. Development would be highly unlikely to adversely affect HLC zone BBHECZ 8 (Historic Environment Character Assessment 2010). Site suitable for development in heritage terms".
- **Object to landscape impact.**
Landscape impact of development on the site has been assessed in the Council's Landscape Impact Study (August 2016), the results for this site are "Site is located within the north of Biddulph, east of the dismantled railway line, and comprises an area of rough grassland and scrub. The site is enclosed by residential development to the south and west, and a sewage treatment works to the north-east, resulting in low visual prominence. Although the adjacent settlement edge is well-defined, it is urban in character to the south of the site. Existing vegetation on the north-eastern site boundaries would form a vegetated settlement edge, and therefore this vegetation should be retained and strengthened where necessary. Site is of low landscape sensitivity."
- **Lack of employment in Biddulph.**
New employment areas are also proposed for Biddulph in the draft Local Plan.
- **Infrastructure could not cope.**
National planning guidance states that the Council should assess the quality and capacity of infrastructure to meet forecast demands. An Infrastructure Delivery Plan is being prepared which will identify the infrastructure necessary to support the Local Plan proposals. It builds on the findings of the Development Capacity Study for the Core Strategy. Consultation and work with infrastructure providers is ongoing and their feedback will inform the Infrastructure Delivery Plan and the Local Plan. The Council is working with

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the County Council to assess the impact of proposed development on school capacity, what additional capacity is needed and how this can be delivered.

- **Site should be designated as public open space.**
The land cannot be allocated as public open space or a community forest as it is privately owned.
- **Amenity issues.**
Issues such as overlooking will be assessed in detail once a site layout has been determined at the time a planning application is received and residents will have the opportunity to comment on the content of that application.
- **Marketing of the consultation.**
The consultation was widely publicised and included a flyer being sent to all households and businesses in the District through Royal Mail. High levels of responses have been received by the Council from Biddulph residents which suggests that a significant number of residents knew about the consultation.
- **Property values.**
Property values are not considered material in planning law.
- **Loss of Agricultural Land**
The land has an agricultural classification of Grade 4 which means that it is poor quality.
- **Query why 20% of the District's development is proposed in Biddulph**
The proportion of 20% of the District's housing development taking place in Biddulph has been through extensive consultation and public examination as it is taken from the Council's Core Strategy which was adopted in March 2014.

Preferred Options Local Plan July 2017

This site was not included as a Preferred Option by the Council in July 2017.

Developer/Agent/Owner

Land owner has objected to the non-inclusion of this site in the Local Plan through their agent. Summary of issues raised:

- Has consistently argued that there is a need to review the Green Belt to meet housing need in the Plan period and beyond.
- Land at Gillow Heath (including BD062) does not perform strongly against the purposes and objectives of the Green Belt and is well-suited for residential development. This was noted in Paragraph 70 of the Inspector's Report on the Core Strategy.
- Welcomes the Council's acknowledgement that it will be necessary to remove land from the Green Belt to meet its housing needs, including around Biddulph. However, consultee is disappointed by what they consider an unjustifiable change of approach from the previous Site Options consultation which rightly identified the land at Gillow Heath as suitable for removal from the Green Belt.
- Urges Council to reconsider its strategy for Biddulph and to include a wide range of sites including BD062, which was previously identified by the Council as

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suitable for allocation, not least because it (along with BD068 and BD087) does not make a strong contribution towards the objectives of the Green Belt.

- The Council has not been able to demonstrate a 5 year housing supply for some time and its delivery performance is poor, perhaps reflecting the constraints associated with many of its allocated or committed sites and the unattractiveness of others to the market. This poor performance should necessitate a buffer requirement of 20% as opposed to the slippage allowance of 10% that is contained within the Core Strategy. The stance of making no allowance at all, as confirmed by this paragraph, is unacceptable and not justified by past delivery performance.
- This allowance will result in more pressure to release land from Green Belt around Biddulph. Housing requirement should not be manipulated to avoid the inevitable consequence of making appropriate housing provision in and around the town.
- Objects to the Biddulph entries at Policy SS4 Table 7.4, which should be increased to provide for a greater percentage (at least 22.5%) and a higher net housing requirement.
- The entry for Biddulph at Policy SS4 Table 7.7 should also be increased accordingly.
- Considers that the strategy for Biddulph is flawed because it does not provide for a range of sites of different sizes, including smaller sites that are capable of being delivered quickly within the early part of the plan period, to meet the existing housing shortfall.
- Consultee is concerned that the vast majority of the provision is proposed to be met on one strategic site (Wharf Road) which is likely to take several years to deliver any new homes.
- No objection to the proposal for a mixed-use development between the bypass and Biddulph Valley Way. However, strongly objects to the inclusion of land to the west of Biddulph Valley Way. This site represents a poor, unsustainable proposal that is not justifiable in comparison to better options that are available.
- Suggests that the figure of 588 dwellings should be reduced and additional sites allocated, including land at Gillow Heath (notably BD062).
- If retained (consultee suggests its removal), development on the land to the west of Biddulph Valley Way should be reduced to no more than 25 dph to reflect its sensitive edge of settlement/open countryside location.
- Concern that Council has made assumptions that are too optimistic with regard to the site's constraints, including: the mining legacy and the impact of numerous mineshafts, the watercourse that runs through the site, significant ecological interests and topographical and landscape issues. All of these require considerable survey work to be undertaken at an early stage.
- This site has been identified for a long time and is yet to be developed. Concern that it may take several years to be fully implemented and even then, is unlikely to deliver the number of dwellings anticipated by the Council.
- The Plan does not provide a clear justification for the inclusion of BDNEW, which has not been consulted on until now.
- Paragraph 9.45 acknowledges that the Green Infrastructure Strategy aims to protect and improve Biddulph Valley Way as an established gateway through the settlement, to increase its use and act as a wildlife corridor. This shows how Biddulph Valley Way is a high valued facility. Its setting and function can only be significantly compromised by the creation of a new estate road across it from the main strategic site to the east.

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- This site does not compare favourably with other more suitable locations, previously identified by the Core Strategy Inspector and more recently the Council.
- The SHLAA findings for this area (previously BD140, BD140a and BD116) clearly state that development in this location would not be appropriate due to breaching the Biddulph Valley Way (which provides a strong edge to the settlement) and intrusion into the open countryside to the detriment of the rural character of the area.
- Considers that the overall capacity of the proposal is too high for the following reasons:
 - BDNEW (170 dwellings) is inappropriate because of its value to the purposes and objectives of Green Belt. Development here would have a significant harmful impact caused by the construction of a main estate road access across the Biddulph Valley Way.
 - The amount of commercial (employment and retail) provision in the northern part of the site has been unacceptably reduced and should be increased again to reflect the provision indicated in the 2016 consultation and provide a better balanced mixed-use urban extension.
 - The capacity of the remaining land to accommodate housing has been overstated having regard to the significant constraints that exist and which have yet to be fully evaluated, including ecology. The area contains former mine workings, is at risk of flooding, is an important visual open space, is steeply sloping and contains springs. There are ponds nearby which may form part of a wider habitat.

Public Response

None received

Council Response

- 5 year supply calculations do include a 20% buffer to reflect historic under delivery.
- Policy H1 provides a degree of flexibility to allow consent to be granted on unallocated sites. In addition, Policy SS4 also commits the Council to monitor housing land supply and review the Local Plan if necessary to bring forward additional allocations. Combined, it is considered that the Local Plan provides sufficient flexibility to ensure the supply of housing land. Whilst the Core Strategy did include a 10% slippage allowance, its policies are more restrictive in terms of support for the development of windfall sites and sites outside of established development boundaries. Adding a slippage allowance into the housing requirements also has the consequence of increasing pressure for releasing Green Belt land which should only be proposed in exceptional circumstances.
- Increasing Biddulph's housing requirement would necessitate further Green Belt release. However, this is not needed as the plan can already accommodate the plan requirement without further loss of Green Belt.
- All of the sites identified in the Preferred Options Local Plan are identified as either available now, or potentially available in the SHLAA. The Council

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communicates with landowners of affected sites to ensure they are available, prior to selection.

- Smaller sites within the development boundary (and Green Belt sites according with para 89 NPPF) not identified as allocations, can nevertheless come forward and would be assessed against all applicable policies.
- The Council's Green Belt Review concludes that land west of the Biddulph Valley Way could be considered for release from the Green Belt provided that exceptional circumstances can be demonstrated. The exceptional circumstances relating to this site are that it will assist with bringing forward a large strategic mixed use regeneration site which is well related to the town centre and its key services and facilities. It is not agreed that the site is unsustainable.
- The figure of 588 is indicative - paragraph 9.35 of the plan states that "actual density levels will be determined through the masterplan process once all the constraints can be assessed in full detail". However it is not considered that this figure is unrealistic as the central part of the site where the constraints exist has been assumed to have a lower density of less than 30 dwellings per hectare.
- Query the evidence that suggests that 25 dwellings per hectare is an appropriate figure.
- The assumed density of land on the west of the Biddulph Valley Way is 35 dwellings per hectare which reflects a lower level of constraints than the central part of the site. It also reflects the need to minimise the use of Green Belt land.
- It is agreed that a development of this size is likely to come forward in phases and would take several years to be completed.
- BDNEW was suggested for consideration as part of the Preferred Sites and Boundaries Consultation. It was included at Preferred Options Stage and consultation has taken place, the results of which will be considered by the Council.
- The Biddulph Valley Way would remain in situ so recreational use could continue.
- The reduction in the employment element of the Wharf Road development reflects the latest evidence. The Council considers that the employment land identified in Biddulph (both on this site and Tunstall Road) meets the town's requirements so this has meant that the surplus non-green belt land could be used for housing.
- The Council is undertaking Local Plan viability work which will support the Submission Version of the Local Plan. Policy H3 states that 33% affordable housing is a target and the actual level of provision will be determined through negotiation taking into account development viability and other contributions.
- The Rural Areas housing requirement was reduced to help minimise Green belt release. Increasing the requirement for Biddulph would go against this objective.
- This sentence has been included to reflect the following wording in the Green Belt Review: "This would constitute a new settlement edge which would have to

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be created, without which there would be a danger of sprawl into open countryside over the longer term". It is considered appropriate to include it as part of the landscaping paragraph as it has landscaping implications.

- It is agreed that in order to meet the plan's current housing requirement there is a need to review the Green Belt boundary around Biddulph and this work has been undertaken.

Local Plan Publication (Submission Version February 2018)

Site suggested as a residential site.

Council Response

Site BD062 was included as an option in the 2015 'Site Options' consultation and in the 2016 'Preferred Option Sites and Boundaries' consultation. However, following the emergence of an alternative more preferable site, this site was removed from the plan in 2017. Also, in their response to the Submission Version Local Plan, United Utilities (whose water treatment works is immediately adjacent to the site) states that "United Utilities wishes to reiterate its preference for sensitive uses such as residential to be located away from our existing operational infrastructure. This is particularly relevant to our wastewater treatment works which are key operational infrastructure." (LPS391)

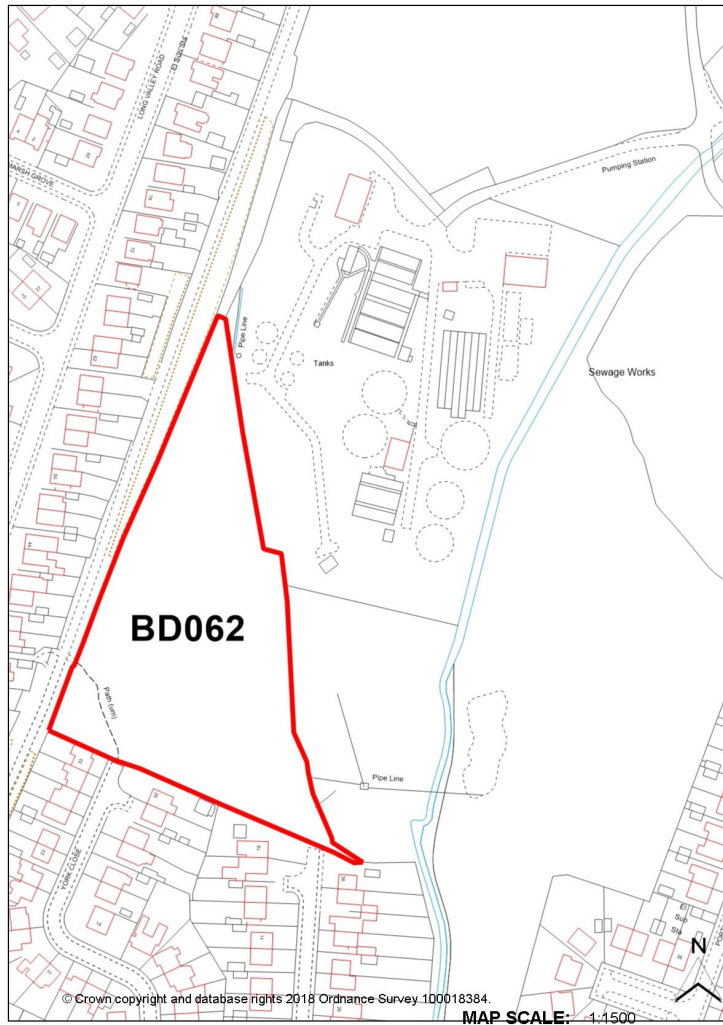
The Submission Version Local Plan seeks to deliver Biddulph's housing requirement whilst ensuring that Green Belt release is kept to a minimum. Approximately, 255 homes are now planned in land currently designated as Green Belt in Biddulph (part of Wharf Road and Tunstall Road sites) compared to 480 in the 2016 consultation. This has been achieved by amendments to the proposed allocations with consideration given to their respective planning merits. Considering these factors collectively, it is considered that there are exceptional circumstances to release these sites from the Green Belt.

An alternative approach of allocating a series of smaller sites around Biddulph for Green Belt release was considered but the Council felt that focussing development in two strategic areas had locational advantages – close to the town centre and Victoria Business Park and would form part of a wider regeneration opportunity to bring forward sustainable mixed use sites to benefit the town.

All the sites included in previous consultations have been assessed against Government policy and the evidence base, undergone consultation and sustainability appraisal. On planning balance the Council has concluded that the selected sites are the most appropriate solution for Biddulph.

Biddulph

BD062 Land north of York Close & Essex Drive



Picture 10.3

BD063 - (Objection to exclusion of site made at Submission Stage)

Biddulph

BD063 Newpool Road

Local Plan Process

Site not included in Local Plan consultation documents as it scored a 'c' class (i.e. 'undeliverable site') in the Council's Strategic Housing Land Availability Assessment.

Key Issues

- Green Belt – not recommended for release in Council's Green Belt Review.
- Low density proposed by agent.

Site Information

Greenfield/ brownfield	Built up area boundary/ countryside	Est. housing capacity	Area (ha)	Density per hectare	Ownership status	Site details
Greenfield	Outside the settlement boundary in the Green Belt	180	8ha (according to agent)	22.5dph	Land available for development	• Agricultural land

Studies

Agent acting on behalf of landowner has submitted:

- Extended Phase 1 Habitat Survey by CES Ecology,
- Highways Technical Note by SCP, and
- an indicative site layout by Barrie Newcombe Associates.

Landscape & Settlement Character Assessment 2008

Not within important landscape setting to settlement.

Green Belt Review - Additional Site Appraisals 2016

(Site 3 'rear of Newpool Road, Biddulph')

Check sprawl: Contribution - in this location part of land containing the western edge of Biddulph.

Maintain Separation: Limited Contribution - no clear role in this location.

Prevent Encroachment: Contribution - part of open countryside to the west of Biddulph.

Preserve Setting: Contribution - a substantial part of the western context for Biddulph.

Overall Impact: The site is on gently rising land to the rear of Newpool Road and as such presents relatively limited visual intrusion and hence limited impact on openness, but has no significant outer boundary with which to contain development. The site appears to seek to 'round off' the settlement edge in this location between Tower Hill Road and Newpool Farm, but in so doing cuts across fields and in only one instance uses a recognisable field boundary. In addition, the site does not abut existing development off Meadowside, leaving a remnant field.

Recommendation: Not recommended for release due to the absence of a clear outer boundary with which to properly contain development, thus preventing localised sprawl. More modest

Biddulph

BD063 Newpool Road

rounding-off to the east of the site could be considered, using a farm track as a boundary to development.

Sustainability Appraisal

Sustainability Appraisal Submission Version June 2018

The proposed delivery of circa 240 dwellings should have a significant positive effect. The site is also accessible to existing services, facilities and areas of employment which is likely to have positive effects. Similarly the location of the site, outside flood zones 2 and 3 and close to the open countryside and walking and cycling routes are also likely to lead to positive effects. However, the site's potential ecological value and contribution to Green Infrastructure is considered likely to have a negative effect, further ecological survey is required. Similarly, the development of greenfield land, partly indicated on the predictive map of best and most versatile agricultural land as within an area where 20-60% of the land is likely to be BMV is likely to have a negative effect, landscape impact assessment is required.

The Council's Green Belt study indicated that BD063a may be suitable for release from the Green Belt if exceptional circumstances can be demonstrated. The site's proximity to historic assets are also assessed as having a negative effect, an applicant should be required to provide an NPPF compliant heritage statement.

This site was not proposed to be taken forward as part of the Local Plan published for representations in February 2018.

Public Consultation

Site put forward as a suggestion for housing by agent in 2015, 2016, 2017 and 2018.

Local Plan Publication (Submission Version February 2018)

Site suggested as a residential site.

Council Response

This large area of land has 3 separate SHLAA records because only a small part of it – BD063a – is categorised as being potentially suitable for development in the Council's Strategic Housing Land Availability Assessment (SHLAA). The rest is C class (i.e. undeliverable) due to its scale as well as having no clear external boundaries to prevent unchecked incursion into the Green Belt.

Green Belt release around Biddulph has been minimised in the Local Plan and the capacity of this whole area would far exceed the level needed to meet Biddulph's housing needs to 2031.

BD063a has been included in previous consultations – Site Options and Preferred Sites and Boundaries (as a smaller variant in line with the recommendation in the Council's Green Belt Review). However, its inclusion is not clear cut as the Green Belt Review states that "a smaller

Biddulph

BD063 Newpool Road

variant of this site (BD063a), bounded by an unmade road to the west (off Newpool Road) might be acceptable, but there are better options to the west of Biddulph.”

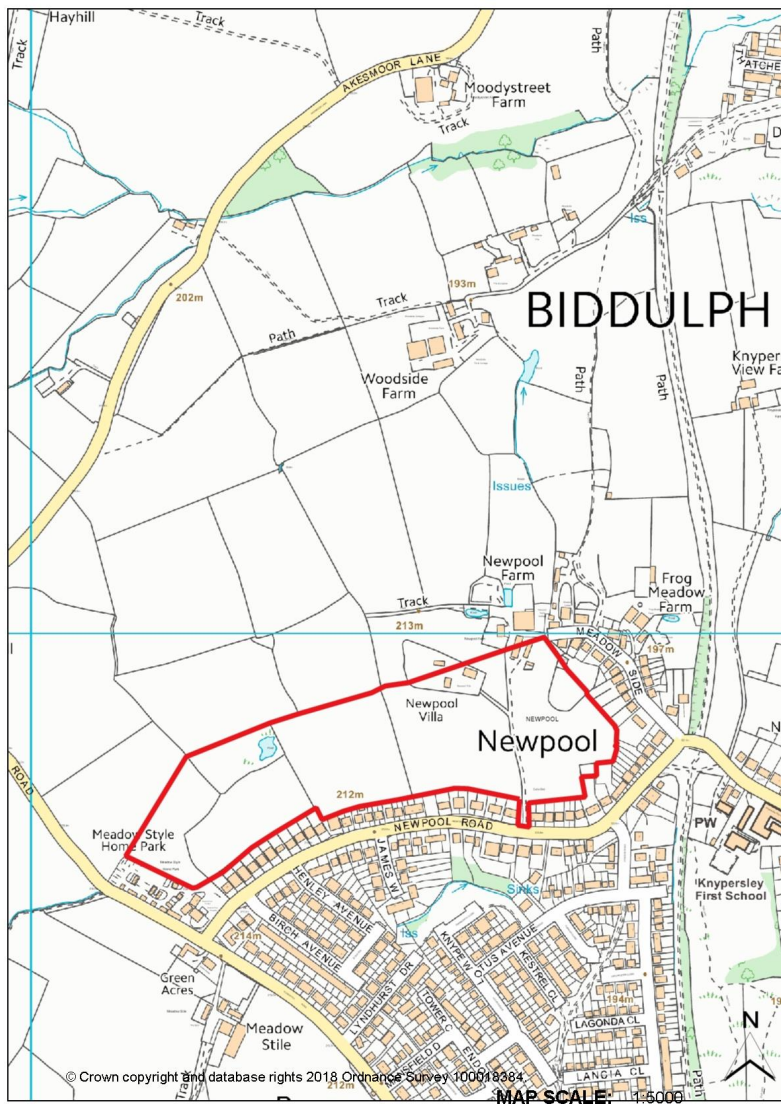
BDNEW is an expansion of an existing allocation. The Submission Version Local Plan seeks to deliver Biddulph's housing requirement whilst ensuring that Green Belt release is kept to a minimum. Approximately, 255 homes are now planned in land currently designated as Green Belt in Biddulph (part of Wharf Road and Tunstall Road sites) compared to 480 in the 2016 consultation. This has been achieved by amendments to the proposed allocations with consideration given to their respective planning merits. Considering these factors collectively, it is considered that there are exceptional circumstances to release these sites from the Green Belt.

An alternative approach of allocating a series of smaller sites around Biddulph for Green Belt release was considered but the Council felt that focussing development in two strategic areas had locational advantages – close to the town centre and Victoria Business Park and would form part of a wider regeneration opportunity to bring forward sustainable mixed use sites to benefit the town.

All the sites included in previous consultations have been assessed against Government policy and the evidence base, undergone consultation and sustainability appraisal. On planning balance the Council has concluded that the selected sites are the most appropriate solution for Biddulph.

Biddulph

BD063 Newpool Road



Picture 10.4

BD063a - (Objection to exclusion of site made at Submission Stage)

Biddulph

BD063a Land off Newpool Road

Local Plan Process

- Site suggestion from the SHLAA
- Included in the options consultation July 2015
- Included in the Preferred Options consultation April 2016
- Not included in the Preferred Options Local Plan July 2017
- Not included in Submission Version Local Plan (February 2018)

Current Position

Site not taken forward into Submission Version Local Plan as:

- An alternative Green Belt site exists adjacent to Wharf Road which will assist with bringing forward a large strategic mixed use regeneration site which is well related to the town centre and its key services and facilities.
- On planning balance the Council has concluded that the selected sites are the most appropriate solution for Biddulph and minimise Green Belt release.

Key Issues

- Green Belt site – Green Belt Review says “might be acceptable, but there are better options to the west of Biddulph.” Exceptional circumstances would need to be demonstrated.
- Ecology – mostly low value but further survey work would be required on the two trees (potential for bat roost) in order to establish SBI/BAS status.
- Low landscape sensitivity and suitable for development in heritage terms.
- Highways - adequate access and visibility splay needed. No objections relating to any impact on wider road network.
- Owner’s agent has done additional work to demonstrate that an appropriate access can be formed onto Newpool Road. It may involve acquiring third party land.
- Possibly located above a historic landfill site – this will be an additional development cost.

Site Information

Greenfield / brownfield	Built up area boundary/ countryside	Est. housing capacity	Area (ha)	Ownership status	Site details
Greenfield	Countryside Green Belt	40 (reduced capacity to reflect Green Belt Review)	1.370 (gross)	Owner willing to develop	<ul style="list-style-type: none"> • Agricultural land used for grazing • Relatively flat site • Minimal landscape impact • Appropriate access needed onto Newpool Road • Close to services & facilities

Studies

Agent acting on behalf of landowner has submitted:

- Extended Phase 1 Habitat Survey by CES Ecology,
- Highways Technical Note by SCP, and

Biddulph

BD063a Land off Newpool Road

- an indicative site layout by Barrie Newcombe Associates.

Green Belt Review (2015) – assessed as part of much larger site BD063a

Check Sprawl	Contribution
Maintain Separation	Significant Contribution
Prevent Encroachment	Significant Contribution
Preserve Setting	Significant Contribution

Significant Impact on Green Belt

An illogical site with no clear external boundaries to prevent unchecked incursion into the open countryside to the west of Biddulph leading up to Mow Cop. **A smaller variant of this site, bounded by an unmade road to the west (off Newpool Road) might be acceptable, but there are better options to the west of Biddulph.** Not Recommended for release at this scale.

Extended Phase 1 Habitat Survey 2015 (FID28)

Site is part of wider area assessed. The site has mostly low biodiversity value overall in terms of the species poor grassland area but has some fairly biodiverse areas connected by hedgerows to the south and north, although the site is attributed district ecological importance due to the presence of trees with bat roosting potential.

The following surveys/ actions are therefore recommended prior to any potential development works being carried out:

- A bat survey regime to ascertain whether bats roost in the trees
- Vegetation removal at the appropriate time of year

Local Wildlife Assessment (ECUS, 2016)

The site habitats are considered to be of nature conservation value at site level only and are not eligible for possible SBI/ BAS status. However, two trees on site have the potential to support bats and as such, require further assessment.

The following surveys/ actions are therefore recommended in order to establish SBI/ BAS status:

- Assessment of the 2 trees for their potential to support roosting bats.

Landscape, Local Green Space & Heritage Impact Study (August 2016)

Landscape Results

The site is located north of Newpool road, and comprises a single field that slopes down from the farm track on the western boundary, to the residential development which encloses the site. The site has low visual prominence due to its topography, and screening provided by the adjacent development and a hedgerow on the western boundary. The linear development on Meadowside does not contribute to a well-defined settlement edge, and development of the site could strengthen the settlement edge. The hedgerow on the western boundary should be retained in order to maintain low visual prominence, and a vegetated edge. **Site is of low landscape sensitivity.**

Heritage Results

There are seven Grade II Listed Buildings within the 400m buffer. The site is set behind existing development and development on the site would be highly unlikely to adversely affect the settings of the heritage assets. The site is set within the HLC

Biddulph

BD063a Land off Newpool Road

zone BBHECZ 2 (Historic Environment Character Assessment 2010). The particular HLC type is least susceptible and development would not alter the character of the zone significantly. **Site is suitable for development in heritage terms.**

Sustainability Appraisal

Sustainability Appraisal Submission Version June 2018

The proposed delivery of circa 120 dwellings should have a significant positive effect. The site is also accessible to existing services, facilities and areas of employment which is likely to have a positive effect. However, the site's ecological value is considered to have a negative effect. Similarly, the development of greenfield land (indicated on the predictive map of Best and Most Versatile agricultural land as urban / industrial) and the site's proximity to historic assets are also assessed as having a negative effect.

The potential landscape and heritage impacts of development require further assessment.

The Council's Green Belt review has recommended considering a smaller variant of this site for release from the Green Belt if exceptional circumstances can be demonstrated.

The capacity of the site was reduced from 120 to 40 to reflect the results of the Green Belt review and this revised site was taken forward as a preferred option for consultation in April 2016.

The site is located north of Newpool road, and comprises a single field that slopes down from the farm track on the western boundary, to the residential development which encloses the site. The site has low visual prominence due to its topography, and screening provided by the adjacent development and a hedgerow on the western boundary.

The Extended Phase 1 Habitat Surveys and Local Wildlife Site Assessment (May 2017) considered the site habitats to be of nature conservation value at site level only and not eligible for possible SBI / BAS status. However two trees on site have the potential to support bats and as such, require further assessment.

There are seven Grade II Listed Buildings within the 400m buffer. The site was considered by the Council's Landscape, Local Green Space and Heritage Impact Study (August 2016) which notes that the site is set behind existing development and development on the site would be highly unlikely to adversely affect the settings of the heritage assets.

The site was considered by the Council's Landscape, Local Green Space and Heritage Impact Study (August 2016) to be of low landscape sensitivity. The study found that the linear development on Meadowside does not contribute to a well-defined settlement edge, and development of the site could strengthen the settlement edge, it was recommended that the hedgerow on the western boundary should be retained in order to maintain low visual prominence, and a vegetated edge.

The site was not proposed for inclusion in the July 2017 preferred option Local Plan.

Biddulph

BD063a Land off Newpool Road

Initial HRA Screening

No Likely Significant Effects (LSEs) have been identified in relation to the preferred option site allocations in Biddulph.

Minerals

No implications.

Options Consultation July 2015

Statutory bodies/stakeholders

Historic England: Made no comments on individual sites recommended that a heritage impact assessment of sites is carried out. (Note – this work has now been completed).

Environment Agency: Site not identified as being in an area likely to be affected by flooding. Need to have regard to the relevant River Basin Management Plan.

Coal Authority: Staffordshire Moorlands is an area where there have been significant coal mining activities which have left a legacy. Recommend that sites are assessed to determine if there coal related hazards which require remediation and the likely impact on mineral resources. Previous coal workings do not prevent development of sites and therefore do not wish to recommend any sites are excluded from assessment on mining legacy grounds.

United Utilities, Severn Trent, Heritage England, Network Rail; no site specific comments

SCC Highways - Not directly connected to the highway. Additional land will be required to provide adequate access and visibility splay.

Natural England - Natural England consider this may represent a strategic site – Has a Landscape & Visual Impact Assessment been carried out? Those sites taken forward to the next stage of the process may require LVIA in order to inform the development specification for the site. (Note – this work has now been completed).

Developer/Agent/Owner – Land available, in a highly sustainable location close to the town centre and facilities and services, landscape impact would be acceptable – could provide treatments to create a defensible boundary, support extension of the site, Phase 1 Habitat survey supplied demonstrating that no features of ecological interest present which would preclude housing development, a suitable access could be achieved using the existing access point (evidence supplied).

Public response 56 comments – all objections.

Objections

- **Infrastructure - Schools** - new school is needed as local headmistress believes all schools in Biddulph are full and will be for next 4/5 years.
- **Infrastructure - Traffic / Transport** (road network cannot cope, problems with bridge on Newpool Road, highway safety - limited access for emergency vehicles and HGVs, inadequate access to site - properties would need to be demolished, pollution from traffic, site is between a bend and the brow of a hill), Knypersley cross roads already heavily congested at rush hour.

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- **Infrastructure - Other** - medical facilities like doctors and dentists, utilities, the area is lacking in facilities for outdoor sport and recreation, Public transport northwards finishes at 6pm. Current deficit in public open space and severe deficit in children's play areas.
- **Landscape** - loss of rural character, sprawl, Newpool Road represents the border between Biddulph and Knypersley and marks a distinct boundary between Biddulph and the Cheshire Plains.
- **Nature Conservation** (foxes, hedgehogs, owls, bats, birds of prey and herons seen on site), loss of trees and hedges
- **Flood Risk** - site floods during heavy rain, resultant increased insurance premiums for residents, during heavy rain sewers in Newpool Road become full forcing water back into householders drains and causing leakage of sewage onto driveways.
- **Amenity** (e.g. noise (from extra traffic and building work), loss of privacy, loss of light - some of properties along Newpool Road are bungalows and the land has an elevated incline, unsightly appearance of new development, detrimental to health of existing residents)
- **Scale of development excessive**
- **Government Policy** (contradicts NPPF Green Belt policy which protects Green Belt land).
- **Other** - Loss of prime agricultural land, develop brown field sites first, other sites elsewhere in the town are more suitable (BD071 + BD071A + BD106 + BD156, BD117, disused garden centres, all sites within development boundary, smaller sites, land off Childerplay Road land in neighbouring authorities, open spaces), site did not appear on any legal searches when buying property, loss of right of way, why is site still an option when it was removed from Core Strategy?, concern about unmapped mine shafts, need for new houses / flats in town centres, existing empty properties in town centres, query number of homes needed following recent newspaper article claiming only 2500 needed for Moorlands, loss of tourist appeal, no jobs being created in the town, consultation leaflet not received by all households and tendency to bin junk mail, consultation event unsatisfactory as there were no map handouts left, online form difficult to use and to find on the website, consultation period too short.

Council response –

- The District Council is working with the County Council on the issue of school capacity. The County has determined that additional school provision would be required to support housing growth at the Primary phase of education. At this early stage in the site selection process there are a number of options for delivering school capacity dependant on the sites selected to take forward.
- There are issues surrounding the suitability of the access point to the site but if these can be resolved to an acceptable standard then development could take place.
- New development is the main way to deliver new or improved infrastructure e.g. more residents may support an improved bus service, more medical facilities. Infrastructure needs specifically related to a new development will be provided as part of that development e.g. children's play areas.
- The land in question is not highlighted as significant in the Council's Landscape & Settlement Setting Assessment. A Landscape & Visual Impact Assessment

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BD063a Land off Newpool Road

will be undertaken during the plan production process and look at all preferred option sites suggesting mitigation measures where appropriate. The results will be incorporated into the Submission Version of the Local Plan.

- The Council has recently completed a Phase 1 Ecological Study for the District. This assessed sites included in the Site Options consultation. The site survey results will be used as part of the site selection process. Any other sites which come forward and are potentially suitable for development will also need to be assessed.
- The Council has recently completed a Level 1 Strategic Flood Risk Assessment for the District, the results of which are being used to inform the site selection process.
- Amenity – issues such as overlooking, screening and other impacts on existing residents will be assessed in detail once a site layout has been determined at the time a planning application is received and residents will have the opportunity to comment on the content of that application.
- It is not considered that development of this particular site would be out of proportion with its surroundings. Any new development taking place will be subject to design policies contained within the new Local Plan – which will be subject to public consultation next year.
- The land in question is within the Green Belt. In order for Biddulph to accommodate new development, the Green Belt boundary will need adjustment as there are not enough sites in the existing settlement boundary to accommodate the level of development needed. The Council has recently completed a Green Belt Review in order to assess parts of the Green Belt where minor adjustments can be made without having an impact on the function of the Green Belt as a whole (as defined in government planning guidance). This study recommends considering a smaller variant of site BD063a for release from the Green Belt but considers that other options would be better. The capacity of the site has been reduced from 120 to 40 to reflect the results of the Green Belt Review.
- The SHLAA has assessed more than 150 sites in and around Biddulph including brown field sites and these have been included as allocations where they are suitable, available and deliverable. However, there is not enough brownfield land to meet the town's requirements so green field sites also need to be included. Prioritising brown field land over greenfield in all circumstances is not part of Government policy. The other sites suggested by residents have all been included in the consultation as potentially suitable development sites.
- The land has an agricultural classification of Grade 3 which means that it is good to moderate.
- The issue of using land in neighbouring authorities will be discussed as part of the Council's duty to co-operate obligation.
- Public footpaths can be maintained or re-directed. This issue would be considered at the planning application stage.

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BD063a Land off Newpool Road

- The Council is aware of mining issues which affect a number of green field sites around Biddulph and investigative work will take place in these areas prior to the commencement of any development.
- New employment land is proposed at the south of the town (BD117). The new Local Plan will cover a period to 2031 so lack of demand (perceived or actual) at one point in time is not a valid reason for not meeting the area's objectively assessed housing needs.

Preferred Options Consultation April 2016

Statutory bodies/stakeholders

United Utilities: Within Biddulph we note site reference BD063a, this appears to be on the boundary of our area with Severn Trent Water for the provision of wastewater services. We would find it helpful to confirm that this site will discharge to that area served by United Utilities.

Council Response

Points of discharge to the wastewater network are a detail which can be confirmed at a later stage in the process once the sites have been allocated in the Local Plan and detailed development schemes become available at the planning application stage.

Environment Agency: The following comments highlight sites where we consider there may be issues relating to contaminated land BD063: According to information held by the Environment Agency, these sites are located above historic landfill sites. The local council, as lead regulator for these sites, should be contacted for further information.

Council Response

It is considered that although this matter will require more detailed investigation at the time a detailed scheme is being developed, it is an additional development cost rather than an issue which would prevent development from taking place.

Biddulph Neighbourhood Plan Working Group: Major concern with traffic issues which need to be addressed before any development, not recommended for inclusion.

Developer/Agent/Owner: We support the Preferred Housing Allocation reference BD063a and associated Green Belt Amendment.

Public Response

**Petition with 883 signatures opposing development on this site
Plus individual objections received**

Issues Identified:

- Presence of historic landfill.
- Why is this area is being reconsidered
- Green Belt and exceptional circumstances for Green Belt Development.
- Develop the mills instead.

Biddulph

BD063a Land off Newpool Road

- Develop Victoria Colliery and Childerplay Road instead.
- Education capacity
- Problematic access to site.
- Use brownfield land instead.
- Should commission a review in to availability of brown field sites.
- Uplands Mill houses not all been sold.
- Loss of public footpath.
- Impact on ecology.
- Impact on landscape.
- Impact on property values.
- Impact on highways.
- BD071 + BD071A + BD106 + BD156 are suitable alternative sites.
- Lack of infrastructure capacity
- Loss of agricultural land
- Mining legacy
- Drainage
- Flooding
- Impact on residential amenity.
- Query need for housing.
- Responses to previous consultation not online.
- Develop in Stoke instead.
- Develop on open space instead.
- Use BD117 for housing instead of employment.
- Question viability of site.
- Lack of capacity at sewage works.

Council Response:

- **Presence of historic landfill.**
It is considered that although this matter will require more detailed investigation if a detailed scheme is being developed, it is an additional development cost rather than an issue which would prevent development from taking place.
- **Why is this area is being reconsidered**
A larger area was considered as a broad area for development as part of the Core Strategy but not included in the final version of the plan.
- **Green Belt and exceptional circumstances for Green Belt Development.**
The land in question is within the Green Belt. The new Local Plan looks at development requirements to 2031. Biddulph's share is lower than Leek and Cheshire as it is recognised that the Green Belt acts as a constraint. In order for Biddulph to accommodate new development, the Green Belt boundary will need adjustment as there are not enough sites in the existing settlement boundary to accommodate the level of development needed. However, the Council's Green Belt Review highlights areas of the Green Belt around the town which could be considered for release without jeopardising the wider purposes of the Green Belt designation. This study recommends considering a smaller variant of site BD063a for release from the Green Belt but considers that other options to the west of Biddulph would be better. The capacity of the site has been reduced from 120 to 40 to reflect the results of the Green

Biddulph

BD063a Land off Newpool Road

Belt Review. The Council has to balance the evidence base and consider the best way forward.

If this site is selected as a housing allocation, exceptional circumstances will need to be demonstrated to justify its release from the Green Belt.

- **Develop the mills instead.**
Brown field sites have been considered as part of the site selection process and it is agreed that the mills in the centre of Biddulph (particularly Yarn Mill and Minster Mill) would be appropriate for residential development. Albion Mill on Station Road is too small for an allocation of its own but if it is developed it would count towards Biddulph's housing needs. The Biddulph Neighbourhood Planning Group are currently working on a Town Centre Masterplan which includes looking at opportunities for redeveloping brownfield sites.
- **Develop Victoria Colliery and Childerplay Road instead.**
Sites at Victoria Colliery and Childerplay Road are within the Green Belt like BD063a. The Green Belt Review has considered the impact on the Green Belt the release of these sites for development would have. Only the Victoria Colliery site was identified as being suitable for consideration for Green Belt release (in exceptional circumstances). In reaching a decision on which sites to include in the Local Plan, the Council must balance evidence and Government policy.
- **Education capacity**
The District Council is working with the County Council on the issue of school capacity. The County has determined that additional school provision would be required to support housing growth at the Primary phase of education. At this early stage in the site selection process there are a number of options for delivering school capacity dependant on the sites selected to take forward.
- **Problematic access to site.**
Further work has been undertaken by the owner's agent to demonstrate that the site can be suitably accessed in accordance with highway standards.
- **Use brownfield land instead / Should commission a review in to availability of brown field sites.**
The Council's Strategic Housing Land Availability Assessment has assessed more than 150 sites in and around Biddulph including brown field sites and these have been included as allocations where they are large enough (10+ units), suitable, available and deliverable. However, there is not enough brownfield land to meet the town's requirements.
- **Uplands Mill houses not all been sold.**
The Uplands Mill housing site has been taken into account in calculating Biddulph's housing needs.
- **Use empty houses**
Need for additional housing stems from a number of factors, for example household formation, in-migration, linkages with future workforce, and other factors. The NPPF makes clear that housing projections are the starting point for assessing housing needs; however these additional factors should also be

Biddulph

BD063a Land off Newpool Road

taken in to account in Council SHMAs. The Council's own housing need assessments are set out in its evidence base on the website. Note that this already takes into consideration empty properties in the Moorlands.

- **Loss of public footpath.**
Public footpaths can be maintained or re-directed. This issue would be considered at the planning application stage.
- **Impact on ecology.**
The Council uses evidence to justify its selection of 'Preferred' allocation sites from wider sites, including ecological evidence: This site was subject to a Phase I ecological survey in 2014 and a later 2016 ecology study considered the scope for 'local wildlife site' (ie.SBI) designation for all preferred option sites. These studies set out evaluations of the sites followed by recommended further surveys/actions in the event of future development. The Council would expect subsequent schemes to take account of this evidence; further Policy NE1 allows for the Council to require ecological mitigatory or compensatory measures where appropriate. Note that ecology evidence must be weighed against all other relevant evidence when the Council selects 'Preferred' sites.
- **Impact on landscape.**
The Council's Landscape, Local Green Space & Heritage Impact Study (August 2016) concludes that the land is of low landscape sensitivity.
- **Loss of ancient trees and hedgerows**
If development takes place on this site any protected trees would be preserved unless there are exceptional circumstances in which case re-planting would be required. Soft landscaping would be integrated into any scheme. If the site is developed hedgerows would be retained within the scheme layout wherever possible.
- **Impact on property values.**
Property values are not considered material in planning law.
- **Impact on highways.**
The Highway Authority does not raise any objections to development of the site.
- **BD071 + BD071A + BD106 + BD156 are suitable alternative sites.**
It is agreed that BD071 + BD071A + BD106 + BD156 are suitable sites and they have been included in the plan.
- **Lack of infrastructure capacity**
National planning guidance states that the Council should assess the quality and capacity of infrastructure to meet forecast demands. An Infrastructure Delivery Plan is being prepared which will identify the infrastructure necessary to support the Local Plan proposals. It builds on the findings of the Development Capacity Study for the Core Strategy. Consultation and work with infrastructure providers is ongoing and their feedback will inform the Infrastructure Delivery Plan and the Local Plan.
- **Loss of agricultural land**

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The land has an agricultural classification of Grade 3 which means that it is good to moderate. It is up to the Council to balance all the planning issues in determining whether to select a site for development in the Local Plan.

- **Mining legacy**
The Council is aware of mining issues which affect a number of green field sites around Biddulph and investigative work will take place in these areas prior to the commencement of any development.
- **Drainage**
Any drainage issues on the land could be resolved through new development.
- **Flooding**
The Environment Agency has stated that the area is not affected by flooding.
- **Impact on residential amenity.**
Issues such as overlooking will be assessed in detail once a site layout has been determined at the time a planning application is received and residents will have the opportunity to comment on the content of that application. Problems arising from the construction period of any works, e.g. noise, dust, construction vehicles, hours of working (covered by Control of Pollution Acts) are not material planning considerations.
- **Query need for housing.**
The National Planning Policy Framework requires that local planning authorities identify the objectively assessed need for housing in their areas, and that Local Plans translate those needs into land provision targets. The Council has prepared a Strategic Housing Market Assessment to assess the district's full housing needs, including affordable housing, whilst taking into account migration and demographic change.
- **Query why Biddulph's share of District Housing Need is 20%**
The 20% figure – Biddulph's share of the District housing requirement - is set out in the Council's Core Strategy, a planning document which has been through consultation and an examination by an independent inspector.
- **Responses to previous consultation not online.**
Regarding comments made in response to the previous consultation, the data was published in a different format which did not include the names of everyone who objected, just a list of the issues raised in their objections and Council responses. Only the statutory bodies (e.g. Environment Agency) were named in the report and not private individuals.
- **Develop in Stoke instead.**
Housing allocations are needed to ensure the District's housing requirement is met. Stoke has their own housing requirement.
- **Develop on open space instead.**
Open space needs to be accessible to local communities so developing it and replacing it outside the town in the green belt is not considered to be a satisfactory approach in planning policy.
- **Use BD117 for housing instead of employment.**

Biddulph

BD063a Land off Newpool Road

The Council is looking to meet the future employment land needs of the District in the period to 2031 – refer to its employment land assessment for further details.

- **Lack of capacity at sewage works.**
United Utilities has a statutory duty to provide capacity for new development so this is not a valid reason for development not to come forward in Biddulph. United Utilities considers that there is no need to expand the treatment works in the development plan period for the growth identified in the development plan.
- **Increase in air pollution**
If the district council considered that a development may adversely impact on local air quality then the applicant is required to undertake air quality assessments to identify these issues and develop options to mitigate these impacts. In addition the district council continually monitors air quality across the district and regularly undertakes review and assessments of this data to identify areas where the traffic could have an unacceptable impact on local air quality.

Preferred Options Local Plan July 2017

This site was not included as a Preferred Option by the Council in July 2017.

Developer/Agent/Owner

Land owner has objected to the non-inclusion of this site in the Local Plan through their agent. Summary of issues raised:

- Disagree with fundamental shift since previous stage i.e. introduction of BDNEW and allocation of land at Blythe Vale for housing.
- The balance of the site at Newpool Farm (as edged red on the plan accompanying these representations) is also promoted as being suitable, available and deliverable as part of a larger development site/allocation.
- Policy DSB1 relates to the Wharf Road Strategic Development Area and we object to the extension of this mixed use allocation (as compared to the 2016 consultation document) to include the land to the west that is currently in Green Belt.
- It is considered that there is no evidence base to support these proposals allocation of this land in the Green Belt to the west of Wharf Road (referred to as 'BDNEW' on the Biddulph proposals map) in place of other previous preferred allocations in Biddulph (including site reference BD063a). Neither the 2015 or 2016 documents considered the release of the land to the west of Wharf Road or part of Blythe Vale for housing, and there has to our knowledge been no consultation on this proposal.
- The OAN range of 235 to 330 dwellings per annum was provided within the SHMA, and has formed the basis of the figure taken forward by the Council in the Preferred Options Plan. It is considered that this OAN range requires further investigation and clarification before it can be considered to be a sound and robust figure, given the huge variations between the present assessment when compared with previous assessments.
- Object to removal of 10% slippage allowance.

Biddulph

BD063a Land off Newpool Road

- A small sites allowance of 10 dwellings per annum in Biddulph is not considered realistic or justified by evidence.
- Site BD063a was previously included in the Preferred Sites and Boundaries Document (April 2016) and should be reassigned as appropriate for development.
- Council's site proforma raises no material considerations which would prevent the development of the site.

Public Response

None received

Council Response

Blythe Vale

The Council has sought to reduce Green Belt release to reflect national policy. The Blythe Vale site was subject to consultation as part of the draft plan ahead of any final decisions being taken regarding the submission version.

The Council continues to work with neighbours through the duty to co-operate. No objections from these bodies were received regarding Blythe Vale. Part of the site was subject to a planning application for 118 homes and is approved (subject to S106).

Policy H1 provides a degree of flexibility to allow consent to be granted on unallocated sites. In addition, Policy SS4 also commits the Council to monitor housing land supply and review the Local Plan if necessary to bring forward additional allocations. Combined, it is considered that the Local Plan provides sufficient flexibility to ensure the supply of housing land. Whilst the Core Strategy did include a 10% slippage allowance, its policies are more restrictive in terms of support for the development of windfall sites and sites outside of established development boundaries. Adding a slippage allowance into the housing requirements also has the consequence of increasing pressure for releasing Green Belt land which should only be proposed in exceptional circumstances.

Windfall allowance - windfall allowances in the plan (average 28%) are broadly in line with the Core Strategy (25% in urban areas 30% in rural areas). Allowances included in the plan are supported by an analysis of such provision since 2006 as follows:

Leek

Large windfall allowance (15 per year) = 210.

Small windfall allowance (10 per year) = 140 Between 2006 and 2016 on average 12 new dwellings were delivered each year on small sites <10 dwellings. This was rounded down to 10 per annum.

Biddulph

Large windfall site allowance (20 overall) = 20 Not many brownfield opportunities identified so figure of 20 considered appropriate.

Biddulph

BD063a Land off Newpool Road

Small windfall allowance (10 per year) = 140 Between 2006 and 2016 on average 8 new dwellings were delivered each year on small sites <10 dwellings. This was rounded up to 10 per annum.

Cheadle

Small windfall allowance (10 per year) = 140 Between 2006 and 2016 on average 11 new dwellings were delivered each year on small sites <10 dwellings. This was rounded down to 10 per annum.

Rural

Small windfall allowance (30 per year) = 420 Between 2006 and 2016 on average 23 new dwellings were delivered each year on small sites <5 dwellings. This was increased to 30 per annum to reflect increased flexibility for infill within and on the edge of the villages.

Furthermore, it should be noted that the Core Strategy adopted a more restrictive approach to supporting windfall than that now proposed. The Housing White Paper also expressed the Government's desire to amend the NPPF to provide additional support for small windfall development.

SHMA

The most recent SHMA Update provides a robust assessment of the objectively assessed need for housing taking account of the 2014 household projections and additional data relating to jobs projections from an additional source in order to provide a more comprehensive and up to date assessment.

Policy DSB1 – Wharf Road Extension

Refer to BDNEW site Pro-forma for details of the evidence base to support the allocation of this site. Consultation on this proposal took place between July and September 2017.

BD063

- This large area of land has 3 separate SHLAA records because only a small part of it – BD063a – is categorised as being potentially suitable for development in the Council's Strategic Housing Land Availability Assessment (SHLAA). The rest is C class (i.e. undeliverable) due to its scale as well as having no clear external boundaries to prevent unchecked incursion into the Green Belt.
- Green Belt release around Biddulph has been minimised in the Local Plan and the capacity of this whole area would far exceed the level needed to meet Biddulph's housing needs to 2031.
- BD063a has been included in previous consultations – Site Options and Preferred Sites and Boundaries (as a smaller variant in line with the recommendation in the Council's Green Belt Review). However, its inclusion is not clear cut as the Green Belt Review states that "a smaller variant of this site (BD063a), bounded by an unmade road to the west (off Newpool Road) might be acceptable, but there are better options to the west of Biddulph."

Biddulph

BD063a Land off Newpool Road

- The Council's site pro-forma for BD063a explains that an alternative Green Belt site exists adjacent to Wharf Road which will assist with bringing forward a large strategic mixed use regeneration site which is well related to the town centre and its key services and facilities i.e. BDNEW.

Local Plan Publication (Submission Version February 2018)

Site suggested for residential development.

Council Response

This large area of land has 3 separate SHLAA records because only a small part of it – BD063a – is categorised as being potentially suitable for development in the Council's Strategic Housing Land Availability Assessment (SHLAA). The rest is C class (i.e. undeliverable) due to its scale as well as having no clear external boundaries to prevent unchecked incursion into the Green Belt.

Green Belt release around Biddulph has been minimised in the Local Plan and the capacity of this whole area would far exceed the level needed to meet Biddulph's housing needs to 2031.

BD063a has been included in previous consultations – Site Options and Preferred Sites and Boundaries (as a smaller variant in line with the recommendation in the Council's Green Belt Review). However, its inclusion is not clear cut as the Green Belt Review states that "a smaller variant of this site (BD063a), bounded by an unmade road to the west (off Newpool Road) might be acceptable, but there are better options to the west of Biddulph."

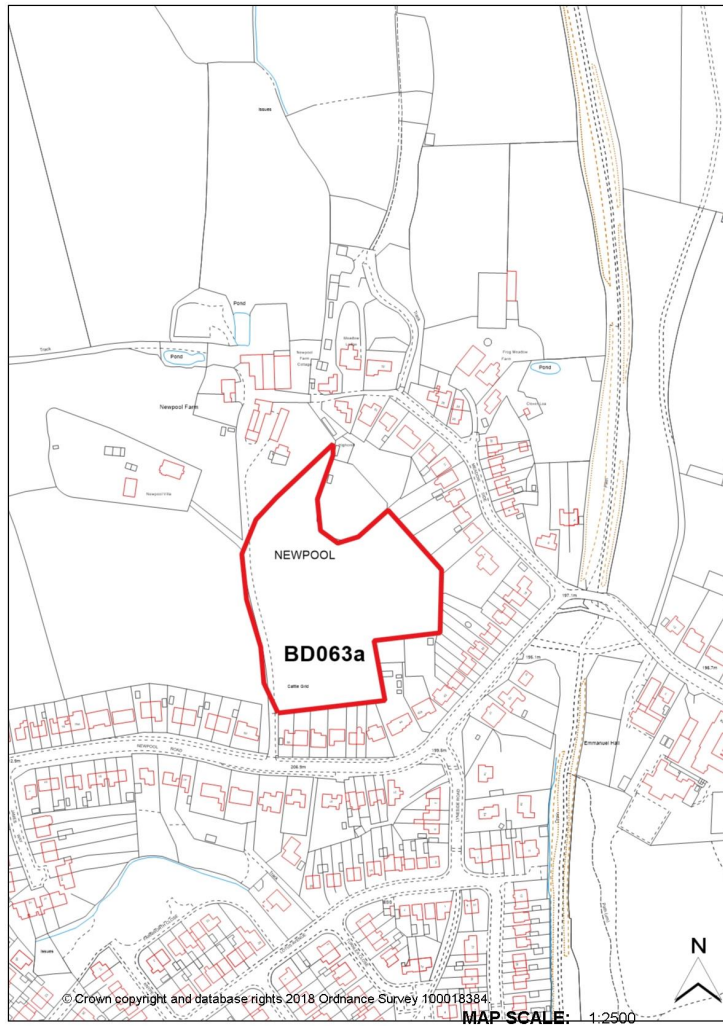
BDNEW is an expansion of an existing allocation. The Submission Version Local Plan seeks to deliver Biddulph's housing requirement whilst ensuring that Green Belt release is kept to a minimum. Approximately, 255 homes are now planned in land currently designated as Green Belt in Biddulph (part of Wharf Road and Tunstall Road sites) compared to 480 in the 2016 consultation. This has been achieved by amendments to the proposed allocations with consideration given to their respective planning merits. Considering these factors collectively, it is considered that there are exceptional circumstances to release these sites from the Green Belt.

An alternative approach of allocating a series of smaller sites around Biddulph for Green Belt release was considered but the Council felt that focussing development in two strategic areas had locational advantages – close to the town centre and Victoria Business Park and would form part of a wider regeneration opportunity to bring forward sustainable mixed use sites to benefit the town.

All the sites included in previous consultations have been assessed against Government policy and the evidence base, undergone consultation and sustainability appraisal. On planning balance the Council has concluded that the selected sites are the most appropriate solution for Biddulph.

Biddulph

BD063a Land off Newpool Road



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Picture 10.5

BD068 - (Objection to exclusion of site made at Submission Stage)

Biddulph

BD068 Land west of Portland Drive

Local Plan Process

- Site suggestion from the SHLAA
- Included in the options consultation July 2015
- Included in the Preferred Options consultation April 2016
- Not included in Preferred Options Local Plan July 2017
- Not included in Submission Version Local Plan (February 2018)

Current Position

Site not taken forward into Submission Version Local Plan as:

- An alternative Green Belt site exists adjacent to Wharf Road which will assist with bringing forward a large strategic mixed use regeneration site which is well related to the town centre and its key services and facilities.
- On planning balance the Council has concluded that the selected sites are the most appropriate solution for Biddulph and minimise Green Belt release.

Key Issues

- Green Belt site – considered to be suitable for removal if exceptional circumstances are demonstrated.
- Adjacent to a United Utilities operational Waste Water Treatment Works - in their representations to the Submission Version Local Plan United Utilities state that it “wishes to reiterate its preference for sensitive uses such as residential to be located away from our existing operational infrastructure. This is particularly relevant to our wastewater treatment works which are key operational infrastructure”.
- Noise and odour reports have been received from the developer. Noise mitigation measures are recommended which could potentially be implemented as part of a development scheme – no odour mitigation measures are considered necessary.
- Proposed development area excludes Flood Zone 2.
- No landscape or heritage issues in relation to development of this site.
- Ecological surveys are recommended in order to establish SBI/ BAS status.

Site Information

Greenfield/ brownfield	Built up area boundary/ countryside	Est. housing capacity	Area (ha)	Ownership status	Site details
Greenfield	Countryside Green Belt	70	2.3 (gross)	Owner supports development	<ul style="list-style-type: none"> • Adjacent to United Utilities water treatment works • Close to & well related to existing residential development

Studies

Agent acting on behalf of landowner has submitted:

- Concept Masterplan
- Highways correspondence
- Drainage correspondence
- Odour Impact Assessment

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- Noise Assessment
- Environmental Health correspondence

Green Belt Review 2015

(Appraised sites according to their contribution to Green Belt Purposes) Assessed with BD062

Check Sprawl: Limited contribution

Maintain Separation: Limited contribution

Prevent Encroachment: Limited contribution

Preserve Setting: Contribution

Overall Impact on Green Belt Purposes: Limited

These sites are connected though their enclosure to the north by Marsh Green Road, As such they are effectively part of the built envelope of Biddulph in this location and notwithstanding the presence of a sewage treatment works between the sites could be developed without impinging on the wider Green Belt either physically or visually.

Recommendation: Consider for release

Extended Phase 1 Habitat Survey 2015

The site has been deemed to have ecological importance due to the presence of trees with bat roosting potential, potential reptile populations and good connectivity to other biodiverse habitats.

The following surveys/ actions are therefore recommended prior to any potential development works being carried out:

- A bat survey regime to ascertain whether bats roost in the tree
- Reptile survey
- Badger survey
- Vegetation removal at the appropriate time of year

Local Wildlife Assessment (ECUS, 2016)

The site habitats are considered to be of nature conservation value at site level only and are not eligible for possible SBI/ BAS status. However, the tree on site has the potential to support bats and as such, requires further assessment. The site was also noted as potentially supporting reptiles.

The following surveys/ actions are therefore recommended in order to establish SBI/ BAS status:

- Assessment of the building for it's potential to support roosting bats.
- Reptile survey required

Landscape, Local Green Space & Heritage Impact Study (August 2016)

Landscape Results:

Site is located within the north of Biddulph, south of Marshgreen Road. The site comprises fields enclosed by residential development to the north, east and south; and sewage treatment works to the west. The site is elevated above Marshgreen Road, however it is at a similar level to the adjacent residential development on Portland Drive, and has low visual prominence due to screening provided by the surrounding development and vegetation, particularly trees surrounding the sewage works. The site forms a gap in development, and therefore fits in well with the existing settlement form.

Site is of low landscape sensitivity.

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Heritage Results:

There is one Grade II* and eight Grade II Listed Buildings, and a Registered Park and Garden which is also a Conservation Area within the 400m buffer. There was no public access on to the site which is elevated above Marshgreen Road, and it is at a similar level to the adjacent residential development on Portland Drive. Development would be unlikely to cause high adverse effects to the settings of the heritage assets as development would be seen in context of the existing housing estate. Development would not adversely affect HLC zone BBHECZ 8 (Historic Environment Character Assessment 2010).

Site suitable for development in heritage terms.

Sustainability Appraisal

Sustainability Appraisal Submission Version June 2018

The proposed delivery of circa 70 dwellings is considered to have a significant positive effect, as could the site's proximity to existing areas of employment. The site is also accessible to existing services and facilities which is likely to have a positive effect. However, the site is located within a flood zone which is likely to have a significant negative effect. Similarly, the ecological value is considered to have a negative effect, as could the development of greenfield land (indicated on the predictive map of Best and Most Versatile agricultural land as urban / industrial) and the site's proximity to heritage assets is also assessed as having a negative effect.

Site is located within the north of Biddulph, south of Marshgreen Road. The site comprises fields enclosed by residential development to the north, east and south; and sewage treatment works to the west. The site is likely to be affected to some degree by flood risk; allocation will require the support of the Sequential Test and a level 2 SFRA.

The Council's Green Belt review has recommended considering this site for release from the Green Belt if exceptional circumstances can be demonstrated. The potential landscape, heritage and ecological impacts of development require further assessment.

The site was taken forward as a preferred option for consultation in April 2016.

The Extended Phase 1 Habitat Surveys and Local Wildlife Site Assessment (May 2017) considered the site habitats to be of nature conservation value at site level only and not eligible for possible SBI / BAS status. However the tree on site has the potential to support bats and as such requires further assessment. The site was also noted as potentially supporting reptiles.

The site was considered by the Council's Landscape, Local Green Space and Heritage Impact Study (August 2016) to be of low landscape sensitivity. The study found that the site is elevated above Marshgreen Road, however it is at a similar level to the adjacent residential development on Portland Drive, and has low visual prominence due to screening provided by the surrounding development and vegetation, particularly trees surrounding the sewage works. The site was considered to form a gap in development, and therefore to fit well within the existing settlement form.

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There is one Grade II* and eight Grade II Listed Buildings, and a Registered Park and Garden which is also a Conservation Area within the 400m buffer. The site was considered by the Council's Landscape, Local Green Space and Heritage Impact Study (August 2016) which notes that there was no public access on to the site which is elevated above Marshgreen Road, and it is at a similar level to the adjacent residential development on Portland Drive. Development would be unlikely to cause high adverse effects to the settings of the heritage assets as development would be seen in context of the existing housing estate.

The site is adjacent to United Utilities water treatment works - master-planning may be required in order to mitigate the risk of odour and noise nuisance. Any masterplan should also demonstrate how a development scheme will address potential ecological value, contribute to the priorities and actions proposed for the Biddulph strategic GI corridor (as set out in the Green Infrastructure Strategy), including by supporting public access on to the Biddulph Valley Way and use of natural drainage to help manage surface water.

The site boundary requires amendment to exclude land within Flood Zone 2. The site was not proposed for inclusion in the July 2017 preferred option Local Plan.

Initial HRA Screening

No Likely Significant Effects (LSEs) have been identified in relation to the preferred option site allocations in Biddulph.

Minerals

In Mineral Safeguard Area for 'Superficial Sand and Gravel'. Any application should be accompanied by a Mineral Safeguarding Statement. Developers should take account of the requirements of Policy SD1 (5) and investigate the potential for using in-situ minerals in construction works.

Options Consultation July 2015

Historic England: Made no comments on individual sites recommended that a heritage impact assessment of sites is carried out. (Note – this work has now been completed).

Coal Authority: Staffordshire Moorlands is an area where there have been significant coal mining activities which have left a legacy. Recommend that sites are assessed to determine if there coal related hazards which require remediation and the likely impact on mineral resources. Previous coal workings do not prevent development of sites and therefore do not wish to recommend any sites are excluded from assessment on mining legacy grounds.

United Utilities, Severn Trent, Heritage England, Natural England, Network Rail; no site specific comments

SCC Highways - Acceptable subject to access design and visibility splays. Access is likely to need to be close to the bridge in order to meet visibility standards. Footway should be provided on the frontage to connect to the existing footway. Possible improvements to Marsh Green Road/Congleton Road junction. May be appropriate to realign Marsh Green Road to provide visibility to plot BD087 if possible and if agreement can be reached between owners.

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Environment Agency – Site is likely to be affected to some degree by flood risk and if taken forward will require the support of the Sequential Test and a Level 2 SFRA. Need to have regard to the relevant River Basin Management Plan. (Note – it has been agreed with Environment Agency that this would not be needed if the boundary of the site is adjusted to remove flood zone).

Developer/Agent/Owner Support development of this site. Propose a sustainable development to include sheltered housing compliant (subject to conditions) with Environmental Health, Environment Agency, United Utilities and Highway Authority requirements. Major supermarket less than one mile from site, churches and schools within easy walking distance, main line railway station at Congleton is just 4 miles away, close to A34 which connects to M6.

Public response 72 comments – 71 objections and 1 neutral.

Issues raised:

Objections

- **Infrastructure** - Oxhey First School, Woodhouse Academy and Biddulph High School are all full with limited opportunity for expansion.
- **Infrastructure - Traffic / Transport** - Access to the site would be difficult - crosses a public footpath, Marsh Green Road, Portland Drive, Beaumont Close, Marsh Green Close and bridges cannot cope with more traffic - no footpaths on a large part of Marsh Green Road, narrow and no street lighting, dangerous for pedestrians and cyclists - it is not suitable for HGVs, Congleton Road junction with Woodhouse Lane / Marsh Green Road is dangerous, visibility problems - this would be made even worse if all proposed sites in this area were developed, pollution from extra traffic.
- **Infrastructure - Other** - Local amenities are not sufficient for existing residents - doctors full, does water treatments works have the capacity for proposed new development? No access to local shops without car, Public transport northwards finishes at 6pm. Current deficit in public open space and severe deficit in children's play areas.
- **Landscape** - site is part of a steep hillside so would be difficult to build on, loss of attractive landscape, negative impact on character of area.
- **Nature Conservation** - Mature trees and abundant wildlife on site including newts, kingfishers, sparrow hawks, buzzards, foxes, badgers, squirrels, robins, wrens, swallows, blue tits, goldfinches, kestrel and jay. Site has also recorded roosts for Daubenton's Bats and Pipistrelle Bats.
- **Flood Risk** - watercourse is prone to flooding, question whether adjacent land is unstable as it is constantly damp, potential issues obtaining home insurance for existing and future residents, development will increase surface water run off, Mow Lane floods, surface water will find its way into sewerage system which cannot cope at present due to design / construction of town sewer causing flooding in Gillow Heath - United Utilities say this cannot be solved without considerable funds.
- **Amenity** (e.g. noise, privacy, loss of light) - Too close to sewage works which can be noisy (works are carried out at night) and smelly, potential health hazard from flies, new residents would have a clear view of site in winter as much of screening is not evergreen, many of properties on Portland Drive are single storey so new development would be overbearing and detrimental to their amenity in terms of privacy and loss of light, extensive earthworks would be required which would be intrusive and noisy for residents. Refer to Government's

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document "Code of Practice on Odour Nuisance from Sewage Treatment Plants".

- Scale of development - too high.
- Government Policy - Land is Green Belt and should be protected from development.
- Other - Difficult to build on land due to high concentration of sewage pipes, site has been used for landfill in the past so query any public health risks, contamination from works running into Biddulph Brook, question whether development is economically viable, more appropriate to build next to bypass (e.g. BD071, BD071a) or on brownfield land, land is in use for grazing, new development generally has a poor appearance, no additional employment proposed, town centre is declining, lack of demand for additional housing - housing on Uplands Mill is not selling, will attract in-migration, increased social problems from social housing, Gillow Heath area will be taking majority of houses, Core Strategy contradicts itself - talks about protecting open space, previous planning application refused, residents do not understand abbreviations used on SHLAA form and would like to see information landowner has provided to Council, poor awareness of consultation - expect to be written to personally about developments affecting them, comments form has too much technical language with residents struggling to understand it, need for new houses / flats in town centres, existing empty properties in town centres.

Council response –

- The District Council is working with the County Council on the issue of school capacity. The County has determined that additional school provision would be required to support housing growth at the Primary phase of education. At this early stage in the site selection process there are a number of options for delivering school capacity dependant on the sites selected to take forward.
- The Highway Authority considers that this development is acceptable subject to detailed design issues. Public footpaths can be provided as part of a development scheme. Cumulative impact of several developments in this area would be assessed through a TA.
- The Council has recently completed a Level 1 Strategic Flood Risk Assessment for the District, the results of which are being used to inform the site selection process. Where necessary, additional assessment work will be undertaken in line with Environment Agency requirements. Mitigation measures will be taken as part of the site development to address any surface water issues.
- New development is the main way to deliver new or improved infrastructure e.g. more residents may support an improved bus service and medical facilities. Infrastructure needs specifically related to a new development will be provided as part of that development e.g. children's play areas.
- United Utilities has advised that if appropriate measures for surface water disposal are included within development schemes then there should be no detrimental impact on the capacity of their infrastructure.
- The land in question is not highlighted as significant in the Council's Landscape & Settlement Setting Assessment. A Landscape & Visual Impact Assessment will be undertaken during the plan production process and look at all preferred

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option sites suggesting mitigation measures where appropriate. The results will be incorporated into the Submission Version of the Local Plan.

- The Council has recently completed a Phase 1 Ecological Study for the District. This assessed sites included in the Site Options consultation. The site survey results will be used as part of the site selection process. Any other sites which come forward and are potentially suitable for development will also need to be assessed.
- Amenity – issues such as overlooking and loss of light as well as other impacts on existing residents will be assessed in detail once a site layout has been determined at the time a planning application is received and residents will have the opportunity to comment on the content of that application.
- An odour assessment of the sewage works has been undertaken on behalf of an adjacent landowner and it concludes that the vast majority of the area is suitable for residential use (any which is not can be left undeveloped) and odour issues should not be viewed as a constraint to planning consent.
- The land in question is within the Green Belt. In order for Biddulph to accommodate new development, the Green Belt boundary will need adjustment as there are not enough sites in the existing settlement boundary to accommodate the level of development needed. The Council has recently completed a Green Belt Review in order to assess parts of the Green Belt where minor adjustments can be made without having an impact on the function of the Green Belt as a whole (as defined in government planning guidance). This study recommends considering release of BD068 from the Green Belt.
- The landowner has undertaken some initial assessments and considers that the site is viable for development.
- The SHLAA has assessed more than 150 sites in and around Biddulph including brown field sites and these have been included as allocations where they are suitable, available and deliverable. However, there is not enough brownfield land to meet the town's requirements so green field sites also need to be included. Sites BD071 and BD071a have been included as potential allocations. Prioritising brown field land over greenfield in all circumstances is not part of Government policy.
- The land has no agricultural land classification as it is classified as being within the urban area.
- New development would need to follow the Council's design policies, which will be the subject of consultation as part of the Local Plan production process.
- New employment land is proposed at the south of the town (BD117). New investment in the town would have knock-on positive effects for the town centre.
- The new Local Plan will cover a period to 2031 so lack of demand (perceived or actual) at one point in time is not a valid reason for not meeting the area's objectively assessed housing needs. The Council's evidence demonstrates a need for affordable housing in Biddulph and this is reflected in local policy (set out in the Core Strategy). The Council is required to seek to address this need.

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The distribution of development around the town will be considered as part of the selection of Preferred Options sites.

- If development were to take place, the provision of on site open space would be a requirement.
- The previous planning history of a site, particularly from over 20 years ago (1991 in this case) is not a good indicator as to whether a site is acceptable at this time as circumstances and policies will have changed over time.
- Housing requirements in the Staffordshire Moorlands are in addition to existing properties even if these are for sale or derelict.

Preferred Options Consultation April 2016

Statutory Bodies / Stakeholders

United Utilities

We wish to emphasise the need to carefully consider the allocation of new housing sites in close proximity to our wastewater treatment works. In this regard we note that our wastewater treatment works (WwTW) in your local authority include: Biddulph WwTW; Biddulph Park WwTW; and Flash WwTW. We wish to highlight that a wastewater treatment works can result in emissions which include odour and noise. Therefore if you are considering any sites for new allocations, especially housing allocations, near to a wastewater treatment works, you should carefully consider the sites with your Environmental Health colleagues. This is important when comparing sites close to treatment works with potential alternative sites that may be available to you for allocation. This reflects our earlier correspondence to you. The position of United Utilities is that when considering a range of sites to meet housing needs, it would be more appropriate to identify new housing sites, which are sensitive receptors, that are not close to a wastewater treatment works. We note this point is particularly relevant to your assessment of sites considered for allocation in Biddulph as part of the current Preferred Options Sites and Boundaries consultation. In particular, site references BDO68, BDO62 and BDO87, which are sited in close proximity to Biddulph Wastewater Treatment Works. Notwithstanding this preference, if it is still intended to progress with the allocation of sites near to a wastewater treatment works for housing following discussions with your Environmental Health colleagues, we strongly recommend that your decision should be informed by: 1. an odour impact assessment; and 2. a noise assessment. If after having undertaken these assessments you still allocate land near to the wastewater treatment works for housing, we recommend that there should be detailed associated policy which identifies the need for mitigating measures including any that may be identified as a result of the assessments. We recommend that: 3. careful masterplanning is always prudent in order to mitigate the risk of odour and noise nuisance. For example, any on-site open space should be located so as to act as a buffer between the treatment works and any newly introduced housing. In addition the houses could be orientated so to most appropriately manage the impact of noise; and 4. appropriate soft landscaping is included to strengthen the buffer between the treatment works and the proposed new development.

Further United Utilities Comments May 2017

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With respect to any flooding implications, United Utilities wishes to recommend:

1. The need for foul only flows. Surface water should discharge to a more sustainable alternative than the public sewer; and
2. In advance of submitting the application and once more details are known in respect of the proposed development, the applicant should engage in pre-application discussions with United Utilities so that the most appropriate point of connection to the public sewer can be determined for foul water. The point of connection that is agreed for foul water may then be subsequently specified in any planning conditions recommended to the local planning authority.

Council Response

Comments noted.

Noise and odour assessments have been produced on behalf of the land owner and received by the Council very recently. Noise mitigation measures are recommended which could potentially be implemented as part of a development scheme – no odour mitigation measures are considered necessary.

It is now up to the Council to balance the planning issues in determining whether to select this site for development in the Local Plan.

Detailed associated policy for the site will be included in the Local Plan if it is selected and it is acknowledged that careful master planning of the site will be required including appropriate screening /buffering. Similarly, the recommendations above will be incorporated into policy should the site be taken forward.

It is noted that United Utilities infrastructure is present on this site and if this site is selected as an allocation, a requirement will be included in the policy for this site requiring the developer to enter into early discussions with United Utilities on this matter.

Environment Agency

2 sites in Biddulph are adjacent to the same watercourse. There is a floodplain extent on the western boundary but this is poorly defined at present. A level 2 assessment will be required for these.

Council Response

The site boundary can be amended to exclude land within Flood Zone 2. This approach has been agreed with the Environment Agency since their response to the consultation so a Level 2 Flood Risk Assessment is no longer required for the site.

Staffordshire County Council

In relation to sites BD068 there is likely to be a requirement for junction improvement at Marsh Green Lane/A527; a transport assessment will be required to consider this.

Council Response

Comment noted. A Transport Assessment can be undertaken at the appropriate time.

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BD068 Land west of Portland Drive

Landowner / Agent

No response.

Public Response

Issues Identified:

- Highway infrastructure.
- Presence of UU infrastructure – pipes under the site.
- Noise and odour, existing raw sewage flooding, capacity of water treatment works.
- Flood Zone 2.
- Education capacity.
- Victoria Colliery, Childerplay and north side of Woodhouse Lane as alternative locations for development.
- Use Land North of Woodhouse Lane
- Ecology.
- Loss of Green Belt and exceptional circumstances.
- Lack of community benefit.
- Allocate the site as Visual Open Space.
- Contradiction with Core Strategy Policy SS5b
- Site screening.
- Use of derelict buildings in Biddulph.
- Heritage impact.
- Landscape impact.
- Infrastructure.
- Public open space.
- Amenity issues.
- Marketing of the consultation.
- Developing sites in Stoke instead.
- Property values.
- Lack of demand

Council Response:

- **Highway infrastructure.**
The Highway Authority consider that “the development of the site is acceptable subject to access design and visibility splays. Access is likely to need to be close to the bridge in order to meet visibility standards. Footway should be provided on the frontage to connect to the existing footway. Possible improvements to Marsh Green Road/Congleton Road junction. May be appropriate to realign Marsh Green Road to provide visibility to plot BD087 if possible and if agreement can be reached between owners”.
- **Presence of UU infrastructure – pipes under the site.**
The landowner and United Utilities are aware of the public sewer pipes running underneath the site and any new development would need to enter into early discussions with United Utilities regarding their infrastructure. This requirement will be included in the site policy if the site is selected for development.

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- **Noise and odour, existing raw sewage flooding, capacity of water treatment works.**

United Utilities has a statutory duty to provide capacity for new development so this is not a valid reason for development not to come forward in Biddulph. United Utilities considers that there is no need to expand the treatment works in the development plan period for the growth identified in the development plan.

Noise and odour assessments have been produced on behalf of the land owner and received by the Council recently. Noise mitigation measures are recommended which could potentially be implemented as part of a development scheme – no odour mitigation measures are considered necessary.

Current issues experienced by residents in regard to raw sewage flooding are a separate matter to be investigated by United Utilities.

- **Flood Zone 2.**

The site boundary can be amended to exclude land within Flood Zone 2. This approach has been agreed with the Environment Agency since their response to the consultation so a Level 2 Flood Risk Assessment is no longer required for the site. A planning application would still be needed before this (or any other) site could be developed and the Environment Agency is a statutory consultee.

- **Education capacity.**

Education - The District Council is working with the County Council on the issue of school capacity. The County has determined that additional school provision would be required to support housing growth at the Primary phase of education. At this early stage in the site selection process there are a number of options for delivering school capacity dependant on the sites selected to take forward.

- **Victoria Colliery, Childerplay as alternative locations for development.**

Sites at Victoria Colliery and Childerplay Road are within the Green Belt like BD068. The Green Belt Review has considered the impact on the Green Belt the release of these sites for development would have. Only the Victoria Colliery site was identified as being suitable for consideration for Green Belt release (in exceptional circumstances). In reaching a decision on which sites to include in the Local Plan, the Council must balance evidence and Government policy.

- **Use Land North of Woodhouse Lane**

The land to the north of Woodhouse Lane (west of the school) is not considered suitable for development, mainly due to the heritage impact on the nearby registered park and garden. It is also in the Green Belt.

- **Ecology.**

The Council has had an extended Phase 1 Habitat Survey undertaken on this site in 2015. The site has been deemed to have ecological importance due to the presence of trees with bat roosting potential, potential reptile populations and good connectivity to other biodiverse habitats. The following surveys/

Biddulph

BD068 Land west of Portland Drive

actions are therefore recommended prior to any potential development works being carried out:

- A bat survey regime to ascertain whether bats roost in the tree
- Reptile survey
- Badger survey
- Vegetation removal at the appropriate time of year

There is no evidence at present to suggest that the site cannot be developed for ecological reasons.

- **Loss of Green Belt and exceptional circumstances.**
In order for Biddulph to accommodate new development, the Green Belt boundary will need adjustment as there are not enough sites in the existing settlement boundary to accommodate the level of development needed. The Council has completed a Green Belt Review in order to assess parts of the Green Belt where minor adjustments can be made without having an impact on the function of the Green Belt as a whole (as defined in government planning guidance). This study recommends considering site BD068 for release from the Green Belt provided that exceptional circumstances can be demonstrated.
- **Lack of community benefit.**
Site BD068 will be required to provide a percentage of affordable housing / starter homes to benefit those in the community needing affordable housing.
- **Allocate the site as Visual Open Space.**
The site is not recommended for designation as Local Green Space in the Landscape, Local Green Space and Heritage Impact Study (2016). Local Green Space supersedes the Visual Open Space designation (which is an old designation not supported by Government policy in the NPPF).
- **Contradiction with Core Strategy Policy SS5b**
No contradiction with SMDC Core Strategy Policy SS5b 'Biddulph Area Strategy'. Sites within the urban area and an extension to the urban area are included as well as extensions in the Green Belt identified as part of the Green Belt Review as stated in the policy.
- **Site screening.**
Screening of the sewage works would be required as part of any development on the site.
- **Use of derelict buildings in Biddulph.**
Brown field sites have been considered as part of the site selection process and it is agreed that the mills in the centre of Biddulph (in particular Yarn Mill and Minster Mill) would be appropriate for residential development. Albion Mill on Station Road is too small for an allocation of its own but if it is developed it would count towards Biddulph's housing needs. The Biddulph Neighbourhood Planning Group are currently working on a Town Centre Masterplan which includes looking at opportunities for redeveloping brownfield sites.
- **Heritage impact.**
Heritage Impact of development on the site has been assessed in the Council's Heritage Impact Study (August 2016), the results for this site are

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"There is one Grade II* and eight Grade II Listed Buildings, and a Registered Park and Garden which is also a Conservation Area within the 400m buffer. There was no public access on to the site which is elevated above Marshgreen Road, and it is at a similar level to the adjacent residential development on Portland Drive. Development would be unlikely to cause high adverse effects to the settings of the heritage assets as development would be seen in context of the existing housing estate. Development would not adversely affect HLC zone BBHECZ 8 (Historic Environment Character Assessment 2010). Site suitable for development in heritage terms."

- **Landscape impact.**
Landscape Impact of development on the site has been assessed in the Council's Landscape Impact Study (August 2016), the results for this site are: "Site is located within the north of Biddulph, south of Marshgreen Road. The site comprises fields enclosed by residential development to the north, east and south; and sewage treatment works to the west. The site is elevated above Marshgreen Road, however it is at a similar level to the adjacent residential development on Portland Drive, and has low visual prominence due to screening provided by the surrounding development and vegetation, particularly trees surrounding the sewage works. The site forms a gap in development, and therefore fits in well with the existing settlement form. Site is of low landscape sensitivity."
- **Infrastructure.**
National planning guidance states that the Council should assess the quality and capacity of infrastructure to meet forecast demands. An Infrastructure Delivery Plan is being prepared which will identify the infrastructure necessary to support the Local Plan proposals. It builds on the findings of the Development Capacity Study for the Core Strategy. Consultation and work with infrastructure providers is ongoing and their feedback will inform the Infrastructure Delivery Plan and the Local Plan. The Council is working with the Staffordshire County Council to assess the impact proposed development on school capacity, what additional capacity is needed and how this can be delivered.
- **Public open space.**
The land is privately owned and no public rights of way cross the site so delivery of a community forest is unlikely and it cannot be designated as Public Open Space.
- **Amenity issues.**
Issues such as overlooking will be assessed in detail once a site layout has been determined at the time a planning application is received and residents will have the opportunity to comment on the content of that application. Problems arising from the construction period of any works, e.g. noise, dust, construction vehicles, hours of working (covered by Control of Pollution Acts) are not material planning considerations.
- **Marketing of the consultation.**
The consultation was widely publicised and included a flyer being sent to all households and businesses in the District through Royal Mail. High levels of responses have been received by the Council from Biddulph residents which suggests that a significant number of residents knew about the consultation.

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- **Developing sites in Stoke instead.**
National planning guidance states that the Council should seek to meet the development needs of their area. Stoke on Trent City Council has its own development needs to meet.
- **Property values.**
Property values are not considered material in planning law.
- **Lack of demand**
The new Local Plan will cover a period to 2031 so lack of demand (perceived or actual) at one point in time is not a valid reason for not meeting the area's objectively assessed housing needs (as required by Government policy).
- **Loss of agricultural land**
The land has an agricultural classification of Grade 4 which means that it is poor quality.

Preferred Options Local Plan July 2017

This site was not included as a Preferred Option by the Council in July 2017.

Land owner has objected to the non-inclusion of this site in the Local Plan through their agent. Summary of objections raised and council response:

Developer/Agent/Owner

- Agrees with the Council's position that development should be distributed towards the larger settlements as opposed to rural areas. Having said that, the Council proposes that only 20% of this growth should be directed towards Biddulph and 30% towards Leek and 25% towards Cheadle. Respondent suggests, given the position of Biddulph in the settlement hierarchy as one of three large settlements, that additional development should be directed towards Biddulph. This would reflect the percentage of development in the other large settlements within the Borough.
- In terms of the Council's housing requirement, the Council have suggested that their need for the plan period 2016-2031 is an additional 6,080 dwellings. This equates to an annual average of 320 homes per year. Whilst respondent is not suggesting that this figure is incorrect, they wish to highlight that this target is almost the same figure as is suggested in the adopted Core Strategy (2014). Policy SS 4 of the Core Strategy suggests that the requirement for Staffordshire Moorlands over the plan period (2006 to 2026) is 6,000 dwellings. Given that this requirement is virtually identical, respondent queries why the Council did not proceed with the Site Allocations DPD as opposed to re-writing the plan in its entirety. Indeed this will only add to further delay in the provision of much needed houses, which have been compounded in recent years by the distinct lack of delivery.

Council Response

Spatial Strategy seeks to preserve Green Belt as far as possible whilst supporting growth in Biddulph. Local Plan housing requirement is backdated to take account of shortfall in provision in recent years.

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Developer/Agent/Owner

- Proposes that BD068 and BD087 are included in the Plan, for residential development.
- BD068 and BD087 are located adjacent to the urban edge of Biddulph, 1.57km from the town centre. The town centre offers a range of services and facilities.
- Site BD068 is bound by existing residential development, with Portland Drive to the south and east, Biddulph Brook to the west and Marsh Green Road to the north. The site has a stone wall boundary with Marsh Green Road and is heavily screened from the neighbouring sewage works to the west of the site.
- Site BD087 is also bound by existing residential development to the south, north and east, and Biddulph Brook to the west.
- Both sites are located within the Green Belt.
- Both sites are located in Flood Zone 1, with an area of Flood Zone 2 and 3 along the brook. None of the sites which has been included in the Concept Plan (submitted as part of respondent's representation) are located in Flood Zones 2 and 3.
- Several public sewers cross the site. However, these could be easily relocated and/or reflected in the layout.
- There are no listed buildings within the confines of these sites. However, Ringwork Castle in Baileys Wood (located 240m to the north of the northern parcel and Biddulph Grange) is a Scheduled Ancient Monument. A Grade I listed Park and Garden is located on the opposite side of Congleton Road (150m from the site) and a Grade II listed Church is located 100m to the west of the site, with the top of the church being visible from the site. There is, however, a row of existing residential development on Congleton Road.
- Both sites are located in a sustainable location, 580m from Woodhouse Middle School, 370m from St Lawrence's and 550m from a convenience store. Within the settlement, there are a number of services and facilities available, including: a supermarket, pub, restaurant, library, post office, town hall, shops, a pharmacy and a doctor's surgery.
- Respondent has attached a Concept Layout Plan, which demonstrates that the site (split into two parcels) is capable of delivering approximately 100 dwellings. Up to 20 dwellings will be delivered on BD087 and up to 80 dwellings on BD068. As shown in the attached plan, development can be accommodated on site whilst still retaining much of the existing vegetation. This is at the same time as including public open space and implementing sustainable drainage systems.
- Both parcels would be accessed via Marshgreen Road, which is considered acceptable by the County's Highways team, subject to a Transport Assessment. The norther parcel would be accessed through an extension and improvement to the current bridge over Biddulph Brook.

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- The Concept Layout Plan further confirms the merits of the site for future residential development and Green Belt release.
- The land highlighted in blue on the Concept Layout Plan is proposed to be used for the benefit of the local community. The owner has suggested numerous uses for this land, including a residential care home, doctor's surgery, crechè, nursery, etc. As well as providing high quality housing on this site, the nearby community and new residents would reap significant benefits from these additional local facilities. This is considered to be a key benefit of developing this site in particular for residential development and as such, should be taken into consideration.
- The release of the site from the Green Belt is supported in the Green Belt Review Study. This study was initially produced as part of the Local Plan evidence in November 2015. This site, BD068 and BD087, was assessed as part of the initial review carried out in November 2015 and was found to overall have a limited impact on the Green Belt purposes of development. Both parcels are rated as having a limited contribution to the Green Belt for 3 purposes (check sprawl, maintain separation and prevent encroachment) and as having a contribution for one purpose (maintain separation).
- In summary, the review states that BD068 is effectively part of the built envelope of Biddulph in this location and could be developed without impinging on the wider Green Belt either physically or visually. In terms of BD087, the parcel is a well contained site which would be round-off existing development in this location, comprising a reasonable outer boundary of Biddulph Brook.
- The allocation BDNEW is located in the Green Belt. This site was not reviewed as part of the initial review or the additional sites review in September 2016 but was reviewed in April 2017. This site scores higher than sites BD068 and BD087 in terms of its contribution to the purposes of the Green Belt. BDNEW is considered to make a contribution to the Green Belt on 3 of the purposes (check sprawl, prevent encroachment and preserve setting) and a limited contribution to one of the purposes (maintain separation). Overall, the review found that development would compromise the openness of the Green Belt in this location by virtue of extending the built edge of Biddulph into the wider countryside.
- Given that BDNEW is considered to have a greater contribution to the Green Belt than BD068 and BD087, respondent encourages the Council to justify why this site has been chosen instead of other sites, which contribute less to the purposed of the Green Belt.

Suitability of the site for residential development

- The land at Marshgreen Road does not suffer from any technical constraints, which is demonstrated through the owners engagement with a number of key statutory consultees and production of key reports. Below is a summary of the outcome of this correspondence and reports.

Highways

- Correspondence from David Plant, a project engineer from the Highways Team at Staffordshire County Council, confirmed that providing access from the opposite side of Biddulph Brook is accepted in principle, subject to the provision of visibility splays

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and appropriate access. For a scheme greater than 80 dwellings, which is what respondent is proposing, a Transport Assessment would be required. As such, residential development on this site is considered as acceptable from a highways perspective.

Drainage

- Correspondence from Jillian Walker from the Developer Services and Planning Team at United Utilities (UU) confirmed that UU had/have no objection in principle to the proposed development provided that the site is drained on a separate system with all surface water flows generated, discharging directly into the adjacent watercourse. As stated above, given that public sewers cross the site, a modification of the site layout or a diversion of the public sewer would be necessary. This, however, would not be a constraining factor preventing residential development.

Flooding

- Although the site is located adjacent to a Flood Zone 2/3 area, the boundary has been pulled back to exclude the area in Flood Zone 2/3. As such, respondent does not believe that this would constitute an issue to prevent development of the site.

Odour impact

- An Odour Assessment, carried out by REC Ltd in May 2017, concluded that odour impacts at the proposed development site would not be significant and they should not be a constraint to planning permission. Development of the site would not be expected to expose future users to unacceptable odour concentrations and as such, residential development is acceptable on this site.

Noise Assessment

- A Noise Assessment, carried out by Echo Acoustics in June 2017, concluded that both sites BD068 and BD087 can be suitably developed for residential use and that noise need not be a reason for refusal of planning permission. Noise mitigation measures were recommended on parcel BD068, which would be implemented as part of development scheme to protect the amenity of current and future residents. These included, the orientation of the facades, the specification of ventilation units and the installing up-rated glazing.

Environmental Health

- Correspondence with the Council's Principal Environmental Health Officer (EHO), Mike Towers, confirmed that there is no significant complaint history regarding odour or insect activity associated with the sewage works. In addition, the EHO confirmed that there is no known mining activity or mineshafts under the two sites. As such, respondent sees no environmental health issues which would prevent development on this site.

Landscape/Heritage

- As suggested in the Council's Pro Formas for the Preferred Options Sites and Boundaries Consultation (April 2016), there are no landscape or heritage issues in relation to development on the site. This is confirmed in the Council's Heritage

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Impact Study, published in August 2016. The study found that both parcels are suitable for development in heritage terms. Due to the intervening buildings and vegetation, development on this site was found to be unlikely to cause high adverse effect to the understanding of the Registered Park and Garden/listed buildings. These proformas also highlight that the site is of a low landscape sensitivity. As such, there are no issues in terms of landscape or heritage which would prevent development on this site.

Ecology

- An ecology report has not been completed for the site, however, the Council's Pro Formas for the site for the Preferred Options Sites and Boundaries Consultation found that site BD087 has mostly low biodiversity value overall in terms of the species poor grassland area. Parcel BD068 is deemed to have ecological importance due to the presence of trees, however, as shown in the submitted concept plan, the trees within and around the site are intended to be retained. The Pro Forma states that there is no evidence at present to suggest that the site cannot be developed for ecological reasons and as such, the site should not be considered as unsuitable for residential use. In any case, prior to any potential development works, a bat survey, reptile survey and badger survey will be completed.
- In summary, this site is supported in the Council's Pro Formas for the site for the Preferred Options Sites and Boundaries Consultation. The proforma states that the only reason as to why the site has not been taken forward to the Preferred Options stage is that an alternative site exists (Wharf Road). As such, respondent encourages the Council to reconsider this site (parcels BD068 and BD087) for residential development.

Council Response

Would query the nature of the exceptional circumstances which exist to support the removal of BD068 and BD087 from the Green Belt and whether they are site specific.

Developer/Agent/Owner

- The Council have demonstrated a consistent under-delivery of housing since 2012. As such, in line with Paragraph 47 of the NPPF, respondent suggests that at least a 5% buffer or at best, a 20% buffer should be added to the housing requirement for the Borough to assist with deliverability. A 5% buffer would be an additional 304 dwellings and a buffer of 20% would be an additional 1,216 dwellings. As shown in the attached Concept Layout Plan, this site can deliver an additional 100 dwellings, which is 1.6% of the current housing requirement. Respondent urges the Council to consider adding a buffer to the housing requirement to support deliverability.
- Paragraph 47 of the NPPF highlights the importance of ensuring choice and competition in the market for land. By allocating one large site, this does not promote choice or competition for land, as all housing for Biddulph will be delivered in this one location. By allocating additional smaller sites, this will offer greater choice and competition for land and housing. Looking at the allocations for Cheadle, there are a number of sites which have been allocated for housing in and around the settlement offering flexibility and range. Respondent urge the Council to take this approach with Biddulph to promote choice and competition. This would provide small, local housebuilders with the opportunity to develop sites within the Borough, in line with paragraph 50 of the NPPF which supports the delivery of a wide choice of high

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quality homes, widening opportunities for home ownership and creating sustainable inclusive and mixed communities. Providing allocating a range of smaller sites, the Council would be delivering the range and flexibility suggested in the NPPF.

Council Response

A 20% buffer is applied to the five year supply calculation in order to address under delivery as required by the NPPF - not the overall development requirement.

The plan allocates four sites for housing / mixed-use development in Biddulph. In addition, windfall allowances for a further 160 homes are made in Policy SS4 which will further help to support a variety of development opportunities for the town.

Developer/Agent/Owner

- Respondent endorses the Council's intention to enhance the role of Biddulph as a significant service centre and a market town and support its regeneration. The Council suggest that this will be achieved through improving the local housing market by increasing the range available and identifying suitable land for housing sites within the urban area and on land adjacent to the urban areas. In order to support and enhance Biddulph's role as a service centre, respondent encourages the Council to distribute equal amounts of development to this settlement as is proposed for Leek and Cheadle. Respondent feels that to increase the housing options available and identify suitable land for housing, a number of smaller allocations should be provided as well as/instead of one large allocation.

Council Response

The Spatial Strategy seeks to preserve Green Belt as far as possible whilst supporting growth in Biddulph. The Spatial Strategy which apportions the housing and employment land requirements between the towns and rural areas, is set out in Pol SS3. The Spatial Strategy is predicated upon creating sustainable, self supporting communities as far as possible. The Leek requirements are retained from Policy SS3 in the adopted 2014 Core Strategy, which was found sound by Inspector. The Biddulph % requirement is lower than Leek, but Biddulph is a smaller town entirely constrained by surrounding Green Belt, as well as experiencing topographical issues. Cheadle, again a smaller town, has 25% requirement. Green Belt is a significant constraint for many of the Rural Areas villages as it can only be released in exceptional circumstances. Cheadle's housing share has risen from the 22% previously put forward in the Core Strategy to reflect the availability of suitable development sites outside the Green Belt.

Developer/Agent/Owner

Respondent endorses that all development will be assessed according to the extent to which it provides for high quality, sustainable housing and to which it meets identified housing needs, having regard to the location of the development, the characteristics of the site and the economics of provision. Having said that, respondent encourages the Council to reconsider the sites allocated in Policy H2.

Respondent supports the redevelopment of the sites within the town centre boundary, The Mills (BD101 and BD102) to provide 57 additional dwellings. This will make an important contribution to the regeneration of the town centre and boost the Council's housing supply in a sustainable location. However, respondent questions

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the Council allocating solely one large site as opposed to BD068 and BD087 and a number of smaller allocations. Deliverability is a key cause for concern with large allocations and given the under-delivery of housing over the past few years, respondents believe that allocating a number of smaller sites would assist the Council in delivering their housing requirement over the plan period.

Council Response

- *Support for the mills sites is noted.*
- *In addition to the mills, the Council has identified two further areas of the town for housing development - at Wharf Road and Tunstall Road.*
- *As this involves partial Green Belt release at Wharf Road and Green Belt release of the whole site at Tunstall Road, exceptional circumstances must be demonstrated.*
- *The Council considers that exceptional circumstances for releasing the Green Belt land on the Wharf Road site are that it will assist with bringing forward a large strategic mixed use regeneration site which is well related to the town centre and its key services and facilities.*
- *The Council considers that exceptional circumstances for releasing the Green Belt land on the Tunstall Road site are that it is ideally located with good road links opposite Victoria Business Park and bringing it forward will have a positive impact on the local economy.*
- *Aside from meeting the housing needs of Biddulph (which could be argued for all Green Belt sites around the town), it is considered more challenging to identify the exceptional circumstances which justify the release of BD068 and BD087 from the Green Belt.*
- *Any other smaller allocations would also need to be in the Green Belt around Biddulph (due to lack of alternatives) and provided they were considered suitable for release from the Green Belt in the Council's Green Belt Review they would also need to explain their exceptional circumstances.*
- *It is considered that the Wharf Road Strategic Development Site is deliverable over the plan period.*

Developer/Agent/Owner

- The Council have allocated one large site at Wharf Road to deliver 588 of the 725 dwellings from allocations. This policy states that development will be subject to: comprehensive master planning, mitigation of heritage impacts, positioning of housing to prevent noise and air quality issues, a flood risk assessment, de-culverting a watercourse, the investigation of possible historic landfill, ecology reports etc. Without this suite of information presented at the outset, respondents question if this site will be suitable to accommodate residential development, if it is capable of delivering 588 dwellings and finally, if this number of dwellings is deliverable over the plan period? Respondent urges the Council to provide clear justification as to why this site has been chosen in place of other sites and also, allocate other smaller sites in and around the Borough to boost the delivery of housing.

Council Response

- *The vast majority of this site (between the bypass and the Biddulph Valley Way) is not in the Green Belt and the principle of development has already been established in the Council's adopted Core Strategy.*

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- *The Council's Green Belt Review concludes that the part of the site on the west side of the Biddulph Valley Way could be considered for release from the Green Belt provided that exceptional circumstances can be demonstrated. The exceptional circumstances relating to this site are that it will assist with bringing forward a large strategic mixed use regeneration site which is well related to the town centre and its key services and facilities. The Council has fully explored options for meeting its development needs without using Green Belt land. Biddulph is unique in that it is the only town in the Staffordshire Moorlands which is surrounded by Green Belt. This was taken into account at the time the Core Strategy was produced when Biddulph's housing proportion was less than the other towns at 20% of the total District housing figure to 2031. This proportion has been carried through into the Local Plan. Following recent consultation and evidence, the Council has reduced the amount of Green Belt land identified for development in Biddulph but there is not enough non-green belt land to meet all of the town's future development requirements.*

Public Response

None received

Local Plan Publication (Submission Version February 2018)

Site suggested for residential development.

Council Response

Sites BD068 and BD087 were included as an option in the 2015 'Site Options' consultation and in the 2016 'Preferred Option Sites and Boundaries' consultation. However, following the emergence of an alternative more preferable site, these sites were removed from the plan in 2017. Also, in their response to the Submission Version Local Plan, United Utilities (whose water treatment works is immediately adjacent to BD068) states that "United Utilities wishes to reiterate its preference for sensitive uses such as residential to be located away from our existing operational infrastructure. This is particularly relevant to our wastewater treatment works which are key operational infrastructure." (LPS391)

The Core Strategy Inspector states that sites in the Green Belt at Gillow Heath 'could' form the basis for small urban extensions. He also states that "it would clearly be premature and therefore inappropriate to give detailed consideration to those sites at this stage".

The Council's Core Strategy acknowledges that some Green Belt release is necessary to enable sufficient housing growth in Biddulph. This document already allocates the part of the site not within the Green Belt as a broad location for housing. BDNEW is an expansion of this existing allocation. The Submission Version Local Plan seeks to deliver Biddulph's housing requirement whilst ensuring that Green Belt release is kept to a minimum. Approximately, 255 homes are now planned in land currently designated as Green Belt in Biddulph (part of Wharf Road and Tunstall Road sites) compared to 480 in the 2016 consultation. This has been achieved by amendments to the proposed allocations with consideration given to their respective planning merits. Considering these factors collectively, it is considered that there are exceptional circumstances to release these sites from the Green Belt.

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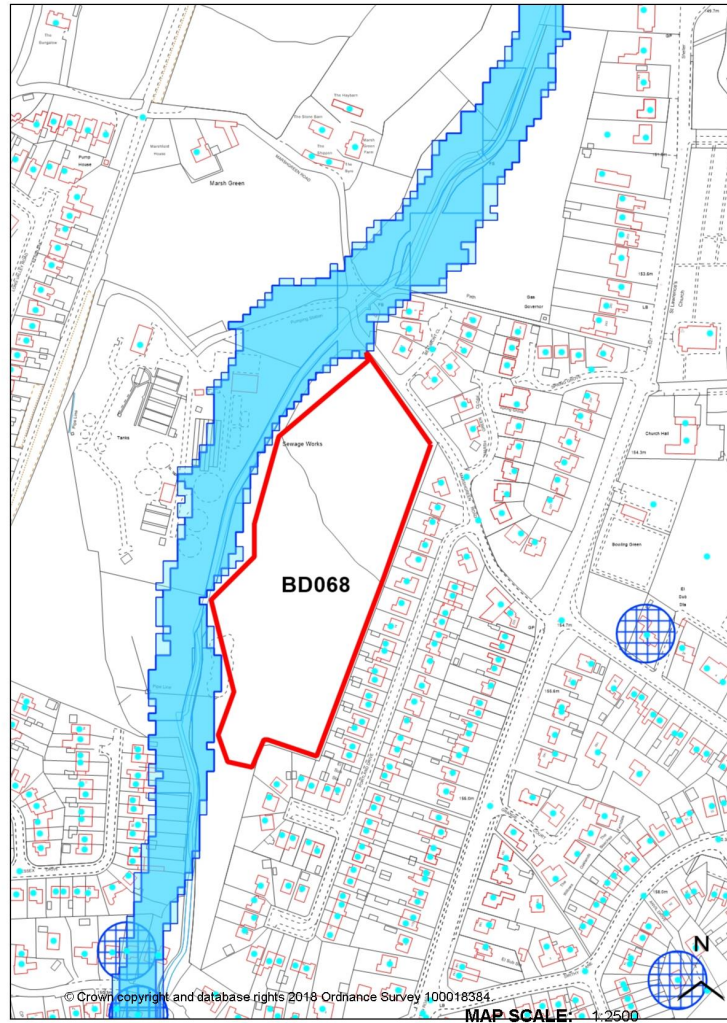
BD068 Land west of Portland Drive

BD068, BD087 and BDNEW have all been assessed as being suitable for release from the Green Belt subject to demonstration of exceptional circumstances in the Council's Green Belt Review. In determining which sites should be included in the Local Plan, the Council must balance relevant evidence, Government planning policy and public opinion.

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(Blue on map shows Flood Zone).



Picture 10.6

BD069 - (Objection to exclusion of site made at Submission Stage)

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BD069 Former nursery adjoining Knypersley Hall

Local Plan Process

- Site suggestion from the SHLAA
- Included in the options consultation July 2015
- Included in the Preferred Options consultation April 2016
- Not included in the Preferred Options Local Plan July 2017
- Not included in Submission Version Local Plan (February 2018)

Current Position

Site not taken forward into Submission Version Local Plan as:

- An alternative Green Belt site exists adjacent to Wharf Road which will assist with bringing forward a large strategic mixed use regeneration site which is well related to the town centre and its key services and facilities.
- Harm of development to Knypersley Hall is a key issue – any harm would need strong justification.
- On planning balance the Council has concluded that the selected sites are the most appropriate solution for Biddulph and minimise Green Belt release.

Key Issues

- Green Belt site – can be considered for release if exceptional circumstances are demonstrated.
- Development of the site would lead to substantial heritage impacts. (Owner included a heritage assessment of the site in objection to Council in 2017).
- Ecology – Further survey work recommended in order to establish SBI/BAS status and to fully complete an extended Phase 1 Habitat Survey.
- Site of medium landscape sensitivity.
- Highways - Spur road off Conway Road (Colwyn Drive) is private and should be brought up to adoptable standard. Access onto Conway Road is good.

Site Information

Greenfield/ brownfield	Built up area boundary/ countryside	Est. housing capacity	Area (ha)	Ownership status	Site details
Greenfield	Countryside Green Belt	30 (30dph - gross)	1.02 (gross)	Owner supports development	<ul style="list-style-type: none"> • Close to Knypersley Hall – listed building – is the former kitchen garden to the hall and has historic significance • Overgrown in parts • Contains trees/shrubs and a number of derelict greenhouses/nursery buildings • Part of Victorian wall associated with the Hall remains

Biddulph

BD069 Former nursery adjoining Knypersley Hall

Studies

Agent acting on behalf of landowner has submitted:

- Heritage Impact Assessment, prepared by Richard K Morriss Associates

Green Belt Review 2015

(Appraised sites according to their contribution to Green Belt Purposes)

Check Sprawl: Limited contribution

Maintain Separation: Limited contribution

Prevent Encroachment: Limited contribution

Preserve Setting: Contribution

Overall Impact on Green Belt Purposes: Limited

Previously developed land with reasonably strong outer boundaries and which would create a logical extension to the current settlement envelope. See also Land north of Mill Hayes Road.

Recommendation: Consider for release

Extended Phase 1 Habitat Survey (FID 21)

It is difficult to ascertain the biodiversity value of the site without full access. The areas of semi-natural broadleaved woodland could also potentially contain badger setts. As a preliminary assumption due to lack of a full survey the following surveys/ actions are at least recommended:

- An Extended Phase 1 Habitat Survey including assessment of bat roost potential
- within trees and buildings, badger survey, open water assessment and noxious weed
- survey as part of the walkover survey.

The following surveys/ actions are therefore recommended from the information gained from limited access:

- A bat survey regime is recommended to ascertain whether bats roost in the trees
- Reptile survey
- Great crested newt survey of nearby pond
- Vegetation removal at the appropriate time of year

Local Wildlife Assessment (ECUS, 2016)

The broadleaf woodland may be of ecological value and may allow for the site to gain SBI/BAS status once the vegetation has been fully recorded. Furthermore, the site offers potential to support bats, reptiles and amphibians,

The following surveys/ actions are therefore recommended in order to establish SBI/ BAS status:

- An extended Phase 1 Habitat Survey, as the assessment could not be fully completed due to issues with access.
- The tree which has the potential to support roosting bats needs to be further assessed.
- Reptile survey required.
- Newt survey required on the pond (pond 4 in ADD04).

Landscape, Local Green Space & Heritage Impact Study: Review of Representations (May 2018)

In 2016 Wardell Armstrong LLP were instructed by SMDC to undertake a study assessing the Council's preferred options development sites in relation to their

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landscape and heritage impact. The 2016 Study also included a review of SMDC's Visual Open Space (VOS) designations. This report was prepared in response to representations submitted on SMDC's Submission Version Local Plan, and should be read in conjunction with the 2016 study. One of the representations addressed within this report is the representation submitted by Walsingham Planning relating to BD069 (Knypersley Hall Garden).

Landscape, Local Green Space & Heritage Impact Study (August 2016)

Landscape Results

Site comprises the former kitchen gardens of Knypersley Hall, which contains the remains of a disused garden centre. The site is currently overgrown, however important features including protected trees and remnants of the original garden wall are present. Development of the site could improve local landscape character through the removal of derelict buildings, the existing metal fencing and scrub. However development within the site would need to be sympathetic to its original use, and ideally would be in keeping with the character of the cottages to the south-east.

Site is of medium landscape sensitivity. Site-specific landscape mitigation measures could include ensuring development is sympathetic to its original use and in keeping with the character of the adjacent cottages.

Heritage Results

There is one Grade II* and one Grade II Listed Building within close proximity to the site. The site contributes greatly to the setting of the Grade II* as a walled garden to the hall, which in turn, contributes to the overall significance of the asset. Development on the site would highly likely cause substantial adverse effects to the setting of the Grade II* Listed Building which would impact upon its overall significance. The HEA states that development is not deemed appropriate in the HLC zone BBHECZ 7 (Historic Environment Character Assessment 2010). **Site could not be developed without substantial heritage impacts.** Please note that this study forms part of a wider evidence base to support SMDC's Local Plan. Therefore the conclusions within this report will be weighed against other evidence when determining the overall suitability of a site for development.

Sustainability Appraisal

Sustainability Appraisal Submission Version June 2018

The proposed delivery of circa 30 dwellings is considered to have a significant positive effect. The site is also accessible to existing employment areas which is likely to have a positive effect. However, the site's proximity to historic assets is assessed as having a significant negative effect. The development of greenfield land indicated on the predictive map of Best and Most Versatile agricultural land as within an area where 20 - 60% of the land is likely to be BMV is also assessed as having a negative effect.

The site formerly served as the kitchen gardens to Knypersley Hall (Listed Grade II*). The site is currently overgrown, however important features including protected

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trees and remnants of the original garden wall are present. Heritage impact assessment is required.

This site was taken forward as a preferred option for consultation in April 2016.

The Extended Phase 1 Habitat Surveys and Local Wildlife Site Assessment (May 2017) considered that the broadleaf woodland may be of ecological value and may allow for the site to gain SBI / BAS status once the vegetation has been fully recorded. Furthermore the site offers potential to support bats, reptiles and amphibians.

There is one Grade II* and one Grade II Listed Building within close proximity to the site. The site was considered by the Council's Landscape, Local Green Space and Heritage Impact Study (August 2016) which notes that the site contributes greatly to the setting of the Grade II* as a walled garden to the hall, which in turn, contributes to the overall significance of the asset. Development on the site was considered highly likely to cause considerable adverse effects to the setting of the Grade II* Listed Building which would impact upon its overall significance. Further assessment may be required to demonstrate that a development can be brought forward in line with planning policy.

The site was considered by the Council's Landscape, Local Green Space and Heritage Impact Study (August 2016) to be of medium landscape sensitivity. The study found that development of the site could improve local landscape character through the removal of derelict buildings, the existing metal fencing and scrub. Site-specific landscape mitigation measures could include ensuring development is sympathetic to its original use and in keeping with the character of the adjacent cottages.

The site was not proposed for inclusion in the July 2017 preferred option Local Plan.

Initial HRA Screening

No Likely Significant Effects (LSEs) have been identified in relation to the preferred option site allocations in Biddulph.

Minerals

No implications.

Options Consultation July 2015

Statutory bodies/stakeholders:

Historic England: Made no comments on individual sites recommended that a heritage impact assessment of sites is carried out.

Environment Agency: Site not identified as being in an area likely to be affected by flooding. Need to have regard to the relevant River Basin Management Plan.

Coal Authority: Staffordshire Moorlands is an area where there have been significant coal mining activities which have left a legacy. Recommend that sites are assessed to determine if there coal related hazards which require remediation and the likely impact on mineral resources. Previous coal workings do not prevent development of sites and therefore do not wish to recommend any sites are excluded from assessment on mining legacy grounds.

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United Utilities, Severn Trent, Heritage England, Natural England, Network Rail;
no site specific comments

National Trust - This would entail the destruction of the remains of the kitchen garden at Knypersley Hall. While the Trust has no direct involvement in Knypersley Hall, the house was the former home of James Bateman – who created the gardens at Biddulph Grange which are in our protective ownership. The significance of the Knypersley gardens is recognized in the 2010 Historic Environment Character Assessment jointly published by Staffordshire Moorlands District Council and Staffordshire County Council. This notes that the Hall is listed grade II* and the stable and coach house grade II. While the character much of the historic parkland associated with Knypersley Hall has changed in the 20th century, some remains of the walled garden survive. These have heritage value in themselves and contribute to the settings of the nearby listed buildings. The National Trust considers that development of the walled garden would cause unnecessary harm to heritage assets and should be resisted.

SCC Highways - Not directly connected to the highway. Spur road off Conway Road (Colwyn Drive) is private and should be brought up to adoptable standard. Access onto Conway Road is good.

Leek and Moorlands Historic Buildings Trust - BD069 is the former kitchen garden of Knypersley Hall (Listed Grade II*). It is currently extremely overgrown and therefore difficult to assess. A decade ago various historic structures still survived here so the site will need careful clearance and detailed assessment in advance of any proposed development.

Developer/Agent/Owner

Support development of site - immediately available, consider it is brownfield, site approximately 1km from town centre and close to Biddulph High School, Mill Hayes playing field and in a residential area. Garden centre closed in 2003, site now derelict, surrounded by security fencing to prevent further vandalism, edge of site is well defined and visually contained by trees and soft landscaping along the boundaries, opportunity to improve Orme Road, no major constraints. Content of NPPF and Core Strategy would not preclude development.

Public response 16 comments – 11 supports, 5 objections.

Issues Raised:

Objections:

- Infrastructure - Schools are full
- Infrastructure - Traffic / Transport - congestion on Conway Road if this and neighbouring site is developed, Orme Road could not cope
- Infrastructure - Other - no parks locally, public transport northwards finishes at 6pm. Current deficit in public open space and severe deficit in children's play areas.
- Nature Conservation - as the site is next to a lake would expect it to have ecological interest.
- Flood Risk - the site is next to a lake, has an abundance of wells, naturally occurring springs and a very high water table so concerned about the effects

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of sinking further foundations into land of this nature and the proximity of the lake.

- Amenity (e.g. noise, privacy, loss of light) - concern about house types - mainly bungalows in this area, do not want youngsters hanging around the streets at night, area is currently quiet
- Scale of development - 30 dwellings is overdevelopment, no possibility of adequate parking.
- Listed Building / Conservation Area - Historic Landscape Character Assessment recommends that development in this area is inappropriate. James Bateman grew up at Knypersley Hall. Study considers that there is good potential for restoring and/or conserving the heritage assets which contribute to the zones historic character, the walled garden and other structures within BD069 would be an ideal place to begin that restoration. Past owners have removed the historic wall. Council should enforce the recommendations of English Heritage so that the site is brought back to its original state and conserved for future generations. This site should have been added to the Staffordshire Moorlands Local Heritage Register a long time ago to prevent it getting into its current state of disrepair.
- Government Policy - Land is Green Belt
- Other - Concerned about the type of people who will occupy the houses, need for new houses / flats in town centres, existing empty properties in town centres, 30 houses on this site will not make a significant contribution to Biddulph's housing needs.

Support:

- Infrastructure - Close to schools
- Infrastructure - Traffic / Transport - opportunity to repair and adopt the road
- Infrastructure - Other - Close to amenities
- Landscape - will enhance current landscape
- Flood Risk - no flood risk
- Amenity (e.g. noise, privacy, loss of light) - site has been a target for arson and vandalism in its current state, current security fencing gives an industrial appearance, no site pollution
- Listed Building / Conservation Area - Listed items like the walls and well could be included in the development to retain its character
- Government Policy - Brown Field Site, Site is not Green Belt
- Other - site has been derelict for around a decade, development would improve the area, site is in a residential area, site is immediately available, considered to be suitable for executive housing.

Council response –

- The Highway Authority has not raised any issues which would prevent the development of this site.
- The District Council is working with the County Council on the issue of school capacity. The County has determined that additional school provision would be required to support housing growth at the Primary phase of education. At this early stage in the site selection process there are a number of options for delivering school capacity dependant on the sites selected to take forward.

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- New development is the main way to deliver new or improved infrastructure e.g. more residents may support an improved bus service. Infrastructure needs specifically related to a new development will be provided as part of that development e.g. children's play areas.
- The Council has recently completed a Phase 1 Ecological Study for the District. This assessed sites included in the Site Options consultation. The site survey results will be used as part of the site selection process.
- Amenity – issues such as overlooking and house types as well as other impacts on existing residents will be assessed in detail once a site layout has been determined at the time a planning application is received and residents will have the opportunity to comment on the content of that application.
- The Council has recently completed a Level 1 Strategic Flood Risk Assessment for the District, the results of which are being used to inform the site selection process. This site is not identified as being within a flood plain. Mitigation measures will be taken as part of the site development to address any surface water issues.
- The scale of development is not an absolute figure at this stage, it is merely an indication. On-site constraints may reduce this figure.
- The land in question is within the Green Belt. In order for Biddulph to accommodate new development, the Green Belt boundary will need adjustment as there are not enough sites in the existing settlement boundary to accommodate the level of development needed. The Council has recently completed a Green Belt Review in order to assess parts of the Green Belt where minor adjustments can be made without having an impact on the function of the Green Belt as a whole (as defined in government planning guidance). This study recommends considering the release of BD069 from the Green Belt.
- Housing requirements in the Staffordshire Moorlands are in addition to existing properties even if these are for sale or derelict. Brown field sites close to the town centre have also been suggested for housing but there are not enough of these to meet Biddulph's housing requirement to 2031.
- The site formerly served as the kitchen gardens to Knypersley Hall. Knypersley Hall was Listed Grade II* in 1984 in recognition of its architectural importance and connection with James Bateman who developed a landscaped garden here and carried out botanical investigation prior to moving to Biddulph Grange. The walled garden is likely to retain features of historic interest worthy of preservation. The historic structures on this site will not be covered by the Knypersley Hall Listing as the site was already in separate ownership at the time of Listing. Residential development of the site has the potential to assess the historic significance of the site and surviving structures and provide funding for conservation repair and enhancement. Development would need to be sensitively sited/designed to preserve heritage significance.
- The Council is commissioning a heritage impact assessment for all the sites selected by the Council as Preferred Options for development and this work will be done under the guidance of Heritage England. The work is expected to be completed this summer and will inform the Council as to which sites are

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appropriate to take forward into its final draft of the plan the 'Submission Version'.

Preferred Options Consultation April 2016

Statutory bodies/stakeholders:

United Utilities Water Limited: (Summary) With regards to site references ADD04, BD069 and BD117, these sites appear likely to discharge to that area served by Severn Trent for the provision of wastewater services. It would be useful to confirm with the respective landowners the likely point of discharge to the wastewater network from these sites so that we can confirm the receiving wastewater infrastructure and therefore better understand the impact.

Council Response

Points of discharge to the wastewater network are a detail which can be confirmed at a later stage in the process once the sites have been allocated in the Local Plan and detailed development schemes become available at the planning application stage.

Natural England: Natural England notes the proposed preferred site for allocation in Biddulph. We note that it is located close to and/or adjoining existing areas of open space and green infrastructure. Suitable enhancements of existing open spaces' may be required together with appropriate management (and funding thereof) in order to allow these open spaces to function effectively during the local plan period. Similarly the development of these preferred sites (if progressed) will need to include suitable multi-functional green infrastructure. Adopted local plan spatial objectives SO8 & 9 refer together with policies such as DC1 Design Considerations, DC3 landscape and settlement setting, and C3 Green Infrastructure.

Council Response

The Council has produced a Draft Green Infrastructure Strategy for consultation alongside the next draft version of the Local Plan. The strategy identifies green infrastructure corridors around the towns and lists particular issues in relation to that corridor which can be addressed as part of the relevant site policy and / or at the planning application stage. Similarly, a public open space study is underway covering all designated public open spaces in the Staffordshire Moorlands. One of the areas this will advise on is where improvements are needed to these spaces and new development in the vicinity could contribute towards this. The Council has also designated Local Green Spaces in line with criteria set out in the NPPF and the Council will seek to facilitate improvements to these areas where required.

Biddulph Neighbourhood Plan Working Group: BD069 - This site was originally the Hall Kitchen garden. There are moves that this site should be restored as a Heritage Kitchen Garden. Until these possibilities have been investigated this site should be withdrawn, not recommended for inclusion.

Developer/Agent/Owner:

We write in support of the proposed allocation of the above brownfield, former garden centre site for residential development, inclusion within the town boundary for Biddulph and removal from the Green Belt. We write as owners of the site since 2003. The site has been in our family since 1940s when our family moved to Biddulph. In writing this letter we have taken advice from town planning consultants

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and have reviewed the consultation documents available on the Council's website. The following sections of this letter establish our reasons for supporting the proposed allocation of this site for residential development, including within the town boundary and its removal from the green belt. Please take this letter as a formal response to the Site Allocations Preferred Options consultation in respect of the site and Question 15, 17 and 19 in particular. The Site and Surroundings The site extends to approximately 1.02 hectares (2.5 acres). The land is shown on the plan attached at Appendix 1 (Ref. SF498873). The site is approximately one kilometre to the southwest of Biddulph town centre, which contains a variety of shops and facilities including a library and leisure centre. The land is bounded, to the north, by Orme Road, beyond which is Biddulph High School. To the south of the site is the Mill Hayes Playing Fields. To the east and west of the site are primarily residential areas. To the south west of the site is a Knypersley Hall which is a Grade II* listed building. The site is a brownfield site which comprises of a former garden centre which was in operation from the late 1960s to 2003. The site is partly covered by greenhouses, other garden centre buildings (as shown on the enclosed photograph) and extensive areas of hard standing. The buildings on site have become dilapidated and have fallen into a state of disrepair following the closure of the Garden Centre in 2003. There are also a number of trees located along the site boundaries. The Principle of Development The Council's adopted Core Strategy (March 2014) identifies a need for 6,000 dwellings in the District between 2006 and 2026. The Core Strategy commits to undertaking an early review to cover the period 2016 – 2031 to ensure that future provision will continue to meet objectively assessed needs. It also states that the Council will seek to enhance the role of Biddulph as a significant service centre and improve the local housing market by increasing the range of houses and allocating deliverable housing sites within the urban area and, on land adjacent to the urban area. Policy SS5B of the Core Strategy states that sites identified adjacent to the urban area of Biddulph shall be in locations which relate well to the urban area, can be assimilated into the landscape and would help secure infrastructure improvements. The supporting text to Policy SS5B states that due to the extent of green belt around the town, opportunities for peripheral expansion are limited. Therefore, it establishes that in order to meet the longer-term needs of the town, some development will be required in the green belt. It states that up to 2026 there will be a need for a minimum of 813 dwellings in Biddulph, of which land for around 200 dwellings would need to be identified in the green belt. Policy SS5B, therefore, states that the allocation of small urban extension sites will require a comprehensive review of the green belt boundary around Biddulph to accommodate the new dwellings through the preparation of the Site Allocations DPD and an early review of the Core Strategy. We understand that the Council has recently reviewed the position in relation to local housing need accounting for the latest Government household projections, new population and employment data. The Council's updated Housing Need report, from January 2016, concludes that the housing need for the District is between 250 to 440 homes per year between 2012 and 2031. Therefore the Council's Preferred Options document proposes an annual housing requirement of 320 homes per year up to 2031. In relation to Biddulph it identifies a requirement for 1196 new dwellings (855 net) during the plan period to 2031. Therefore, we support the general growth strategy for the District and the focus on the delivery of the majority of housing and employment in the main towns, including Biddulph. We also support the proposed allocation of the Knypersley Hall Garden Centre site, within the town boundary, for residential development to help contribute towards meeting the housing needs for Biddulph, for the following reasons. We understand that the Government attaches great importance to Green Belts and that the fundamental objective of Green Belt policy, as established in the National Planning Policy

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Framework (NPPF), is to prevent urban sprawl. Paragraph 79 establishes that the essential characteristics of Green Belts are their “openness” and “permanence”. However, by virtue of the site’s former use as a Garden Centre and the built structures on the site, including various garden centre buildings and green houses, it is considered that the brownfield site does not effectively serve or perform the five purposes or functions of the Green Belt established in paragraph 80 of the NPPF: “to check the unrestricted sprawl of large built-up areas; to prevent neighbouring towns merging into one another; to assist in safeguarding the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.” Moreover, the edge of the site is well defined and visually contained by the existing trees and soft landscaping which are located along its boundaries. The trees and change in levels at the site boundary sever the site from the green belt to the south, in physical and visual terms. This results in the site becoming a pocket of brownfield land that is visually isolated from the main area of green belt to the south. Therefore, development of the garden centre site would result in no visual impact on the openness of the Green Belt. Furthermore, paragraph 89 of the NPPF states that the partial or complete redevelopment of brownfield land, such as the garden centre site, which would have no greater impact on the openness of the Green Belt and the purpose of including land within it would not be considered inappropriate development in the Green Belt. By virtue of the visual containment of the site it is considered that the redevelopment of this brownfield site for housing would not have any greater impact on the openness of the Green Belt or its function and would not constitute inappropriate development in the Green Belt. The land to the south of the site is not in agricultural use and is the Mill Hayes Playing Fields, which are used by Biddulph High School. It is considered that the northern boundary of the playing fields would provide a more appropriate, clear, defensible boundary for the green belt along a physical feature or use which is readily recognisable and likely to remain permanent in line with paragraph 85 of the NPPF. Moreover, we note that the Council’s Green Belt Assessment, undertaken by Amec Foster Wheeler, in November 2015, confirms that the Knypersley Hall Garden Centre site makes a ‘limited’ contribution to the purposes and function of the green belt, is “potentially suitable” for removal from the green belt and comprises: “Previously developed land with reasonably strong outer boundaries and which would create a logical extension to the current settlement envelope.” We also note that the Council recognises, in their Options Site Assessment document (which accompanies the Preferred Options Site Allocations document), that in order for Biddulph to accommodate new development, the Green Belt boundary will need to be adjusted as there are insufficient sites in the existing settlement boundary to accommodate Biddulph’s housing requirement to 2031. In proposing the site as a preferred option for removal from the Green Belt and residential development the Council clearly considers that the site is in a sustainable location that is contiguous with the neighbouring residential area that surrounds the site to the north, east and west. The Council clearly agrees with our view that the site is in an accessible location with good levels of accessibility to range of facilities on foot and by public transport. This is confirmed by the Council’s site assessment which states that the site is well related to the residential area and is close to Biddulph High School and other facilities. Moreover, there are several bus stops in close proximity to the site. These are located on Park Lane and Mayfields Road (less than 300 metres walking distance from the site). The bus stops are served by a number of bus routes which provide access to the various shops, facilities and employment in Biddulph Town Centre and further afield to areas including Congleton, Newcastle and Hanley. As stated previously, the site is brownfield land and contains various garden centre buildings

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and greenhouses. Unfortunately, since the closure of the garden centre in 2003, these buildings have fallen into disrepair. The site has also been the target of both vandalism and arson. Therefore, it is considered that the removal of the site from the Green Belt and its allocation for residential development would enable a viable use for the site and provide the opportunity for the existing dilapidated structures on the site to be replaced by a viable, secure and efficient use of the land for residential development, which would contribute towards meeting the identified housing needs for Biddulph. Given the sustainable location of the site and its accessibility to services and facilities in the town centre it is also anticipated that the site could make an appropriate contribution to meeting affordable housing needs in the district. The site is currently contained by security fencing due to the issues surrounding vandalism and arson. This gives the site an industrial appearance to dwellings surrounding the site. It is considered that the development of the site would also, therefore, provide the opportunity to improve the appearance and security of the site for residents living nearby. Technical Constraints It is understood that a suitable access to the site could be provided from Orme Road. Moreover, the development of the site would offer the potential opportunity for associated improvements to the 'un-adopted' Orme Road by a potential developer. Given the former use of the site as a garden centre it is not anticipated that there would be any issue or constraints to development in terms of ground conditions or contamination on the site. It is also understood that, given the former use of the site, and its location contiguous with the settlement boundary and nearby residential development, the site could be easily linked to mains services. The site is also fairly flat and there are no evident building constraints. According to the Environment Agency's Flood Risk Map the site is located entirely within Flood Zone 1 (i.e. at low risk of flooding with less than 1 in 1,000 annual probability of river or sea flooding). According to the National Planning Practice Guidance (NPPG) residential development is a "more vulnerable" use to flooding. The NPPG confirms that residential development would be considered an appropriate use in Flood Zone 1. The Council's Strategic Flood Risk Assessment (2015) also confirms that the site is in Flood Zone 1 at low risk of flooding. However, we note that there appears to be a minor error in the Options Site Assessment document, which accompanies the Preferred Options Site Allocations document, which suggests that the site is located within a flood zone. There are number of trees located within the site. However, the majority are located towards the site boundaries. Therefore, it is considered that the majority of the quality existing trees on the site could be effectively incorporated in to the design and layout of the site at a later stage. Moreover, the site is not subject to any designations relating to the conservation of ecology or biodiversity. Although the site is located adjacent to Knypersley Hall, a Grade II* Listed Building, as stated in the Council's Site Assessment, the site is secluded and separated from Knypersley Hall by the adjacent lake and a significant number of trees and landscaping and falls outside the curtilage of the Listed Building. Therefore, it is considered that the development of the site for approximately 30 dwellings would not result in any significant impact on the designated heritage asset or its setting, subject to appropriate design. We understand that the Council is currently commissioning a heritage impact assessment, in conjunction with Heritage England, for all the sites selected as Preferred Options allocations and we look forward to reviewing the outcome of this in assessment in due course. We are not aware of any technical constraints that would prevent development of the site for housing. However, should the Council require any further technical information to consider or support the suitability of the site for residential redevelopment and removal from the Green Belt we would be willing to investigate this further and provide any information where possible. Capacity and Deliverability The site is approximately 1 hectare in area. It is assumed

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that it could be developed at a density of approximately 30 dwellings per hectare, given its rural location. Therefore, giving an indicative site capacity of 30 dwellings. This is reflected in the Preferred Options document which indicates that the Council agrees that the site is capable of delivering circa. 30 dwellings. The site is immediately available for residential development. Therefore, assuming that development of the site could commence within two years of the allocation of the site (in the Council's Site Allocations Document which is expected to be formally adopted in 2017), following the grant of planning permission, we anticipate that the total number of dwellings would be constructed and delivered within a further year. Conclusions We trust that our responses above provide sufficient confirmation of our support for the allocation of the site in the Council's Site Allocations Development Plan Document (DPD), its deliverability and its possible contribution to the Council's housing delivery in the short-term, given the identified shortage of housing in the District.

Public response

Issues raised:

- Heritage impact
- Viability
- Flooding
- Ecology

Council Response

- **Heritage impact**
The Council's Landscape, Local Green Space & Heritage Impact Study (August 2016) assesses this site in terms of heritage and landscape impact. The results for heritage are: "There is one Grade II* and one Grade II Listed Building within close proximity to the site. The site contributes greatly to the setting of the Grade II* as a walled garden to the hall, which in turn, contributes to the overall significance of the asset. Development on the site would highly likely cause substantial adverse effects to the setting of the Grade II* Listed Building which would impact upon its overall significance. The HEA states that development is not deemed appropriate in the HLC zone BBHECZ 7 (Historic Environment Character Assessment 2010). Site could not be developed without substantial heritage impacts."

This study forms part of a wider evidence base to support the Local Plan. Therefore, the conclusions within this report will be weighed against other evidence when determining the overall suitability of a site for development.

- **Flooding**
Regarding flooding, no concerns about development of this site have been raised by the Environment Agency nor the Lead Local Flood Officer to date.
- **Ecology**
The Council's ecological evidence consists of a Phase I ecological survey undertaken in 2014 and a Local Wildlife Assessment undertaken in 2016. This recommends that further survey work should take place in order to establish SBI/BAS status. The Council must consider all the evidence and

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reach a decision as to whether to continue to promote the site for redevelopment.

Preferred Options Local Plan July 2017

This site was not included as a Preferred Option by the Council in July 2017.

Developer/Agent/Owner

Land owner has objected to the non-inclusion of this site in the Local Plan. Summary of issues raised:

- Respondent proposed development of Knypersley Hall Garden Centre (BD069).
- The Council is proposing to adopt a housing requirement of 320 dwellings per year (i.e. 6,080 dwellings) for the period 2012-2031. This is 10 dwellings per year less than the upper figure identified in the SHMA update 2017. It is not clear why the Council are proposing to adopt a housing requirement that is below the upper figure identified in the SHMA. Furthermore, this figure also does not appear to take account of the Duty to Co-operate. Respondent is concerned that the housing requirement and Policy SS3 in the emerging Local Plan has not been "positively prepared".
- Respondent is also concerned whether the Local Plan would be "effective" and deliver the level of housing required in the HMA and if the housing requirement is "justified".
- Concerned that the housing requirement identified would fail to satisfy the tests of soundness in the NPPF and the Duty to Co-operate.
- As a minimum, the Local Plan should adopt the upper figure of 330 dwellings per year over the plan period which is identified in the SHMA and ensure that consideration is given to the housing needs of adjacent authorities.
- Allocating the former Knypersley Hall Garden Centre (BD069) could add up to a further 30 dwellings to the housing total, thereby enhancing the flexibility and soundness of the Plan. The below points highlight the importance of allocating this site.
- The Council identifies a net housing requirement of 3,859 dwellings once completions (2012-2017), commitments and an allowance for 100 dwellings in the Peak District National Park are taken into account. Against this requirement the Council proposes to allocate sites to deliver a total of 2,807 dwellings with a total windfall allowance of 1,070 dwellings, during the plan period. The windfall allowance would make up approximately 28% of the total proposed housing supply. In total, this would equate to a supply of 3,877 dwellings. Therefore Policy SS4 would result in the delivery of only 18 dwellings more than the identified minimum requirement during the plan period. This would equate to a 'buffer' of less than 1%.
- The Core Strategy incorporated a "slippage allowance" or 'lapse rate' of 10% of the housing requirement to allow flexibility in the supply. However, SMDC no longer propose to incorporate this allowance or 'lapse rate' as it is considered that the proposed approach to monitoring and housing supply "provide a greater degree of flexibility than the Core Strategy". However, the justification provided is insufficient to support the removal of the slippage allowance particularly in the context of the very limited degree of flexibility proposed in the housing land supply and the past record of under delivery in the District. This level of flexibility, in the respondent's view, is insufficient to ensure that the housing requirement identified by SMDC would be met in the plan period. Therefore, the current

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strategy does not identify sufficient sites to deliver housing for it to be considered 'positively prepared' and sufficiently 'flexible' in accordance with the NPPF. This raises concern regarding the ability of the Plan to meet the tests of soundness.

- The Local Plans Expert Group (LPEG) has recommended that to significantly boost the supply of housing, in accordance with the NPPF, and ensure that needs are met over the plan period, that Local Plans should identify sufficient deliverable or developable sites to meet the housing requirement for the plan period plus an additional allowance for flexibility appropriate to local circumstances. It recommends that to provide extra flexibility developable sites should be identified for approximately 20% of the housing requirement. The Local Plan should, therefore, make provision for the allocation of deliverable and developable sites with the capacity for 20% more dwellings than the adopted minimum requirement, in accordance with the LPEG recommendation.
- In order to provide the 20% buffer recommended the Local Plan should allocate sufficient land to accommodate 772 dwellings in excess of the minimum requirement identified by the LPA of 3,859 (i.e. a total of 4,631 dwellings). Therefore, additional sites should be allocated to provide at least 754 additional dwellings. This level of flexibility is required to provide certainty regarding the delivery of the minimum housing requirement in the plan period.
- The Council has not, to respondent's knowledge, provided a comprehensive list of the sites with planning permission which form part of their supply or any evidence to support the significant portion of the housing requirement that is proposed to be met by windfall sites.
- Concern that sites with planning permission may not be delivered in the timescales or for the numbers anticipated and could fall out of the Council's supply such that minimum housing requirement may not be met. This reinforces respondent's view that SMDC should allow for a lapse rate of "slippage allowance".
- The Council proposes that 725 dwellings would be provided in Biddulph through new site allocations in the Local Plan but 160 dwellings (18%) would be delivered through large and small windfall sites. As set out above, The NPPF states that Council's may make an allowance for windfall sites if they have "compelling evidence" that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Respondent is not convinced, at this stage, that the SMDC has provided compelling evidence to support the proposed windfall allowance. Therefore, respondent is concerned that Policy SS4 and H2 would fail to provide the flexibility required to ensure the delivery of the minimum housing requirement for Biddulph. This raises concern regarding the ability of the Plan to meet the tests of soundness established by paragraph 182 of the NPPF.
- The former Knypersley Hall Garden Centre should be allocated for housing in the current plan period. This would assist in ensuring that the minimum requirements for Biddulph, identified by SMDC are met.
- The strategy for Biddulph, established by this policy and Policy SS6 (LPPO2454), focuses on two large mixed-use allocation sites to meet the housing requirement for the town along with urban regeneration of brownfield sites. This represents a significant shift in strategy from the emerging Site Allocations DPD, which proposed to release a number of smaller sites around the edge of the town, including the former Knypersley Hall Garden Centre site (BD069) for housing. From respondent's review of the evidence available there is no clear justification provided for this change in strategy. Therefore, respondent is concerned whether the proposed strategy in the emerging Local Plan is "justified" and "sound".

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- Has concerns regarding the deliverability of DSB 1: Site may be in multiple ownerships; Constraints to development include noise, air quality, ecology and ground conditions due to historic use of the land for mining and potential landfill; Concerned that the proposed Green Belt release to the west of Biddulph Valley Way is "justified" and the most appropriate strategy when considered against all reasonable alternatives. Respondent notes that the Council's Green Belt Assessment of Additional Sites (2017) assesses the site as having a greater contribution to the five purposes of Green Belt than a number of reasonable alternative sites in the town including BD069. The site is identified as having weak boundaries to the south and west which are not defensible and could fail to prevent further urban sprawl. The SHLAA (2016) also concluded that the development of land to the west of Biddulph Valley Way (BD116) would not be suitable as the Biddulph Valley Way provides a strong boundary to settlement and its development would result in intrusion into the open countryside.
- Has concerns regarding the deliverability of DSB 3: Located in the Green Belt. According to Green Belt Assessment this site performs a greater contribution to the purposes of the Green Belt than Site BD069; Site is located in a predominantly employment area, further from facilities and services in the centre of Biddulph than site BD069.
- Has concerns regarding the deliverability of DSB 2: The sites have a combined area of approximately 0.38 hectares. In order to deliver a total of 57 dwellings this would require the site to be developed at a density of approximately 150 dwellings per hectare. Whilst the site is on brownfield land and in a sustainable location in the town centre, a density of 150 dph would be extremely high when compared to the character of the town.
- The Council has appointed a consultant to prepare a Landscape Local Green Space and Heritage Impact Study (2016) to assess the landscape sensitivity and potential heritage impacts of the proposed allocations.
- In respect of landscape sensitivity, the assessment notes that BD069 is overgrown and sensitive redevelopment of the site could improve local landscape character through the removal of derelict buildings, the existing metal fencing and scrub.
- The edge of BD069 is well defined and visually very well contained by the existing trees and soft landscaping which are located along its boundaries. The site is a pocket of brownfield land that is visually isolated. It is currently bounded by security fencing due to the issues surrounding vandalism and arson. This gives the site an industrial appearance and the development of the site would clearly, therefore, provide an opportunity to improve the appearance and security of the site for residents living nearby.
- In terms of heritage impact (re: BD069) the assessment states that there is one Grade II* and one Grade II Listed Building within close proximity to the site and that the site "contributes greatly to the setting of the Grade II" as a walled garden to the hall, which in turn, contributes to the overall significance of the asset." and that development of the site would be "highly likely" to cause substantial adverse effects to the setting of the Grade II* Listed Building. This conclusion is carried forward into the Council's draft Local Plan Sustainability Appraisal (2017) and is identified as negative impact of the site.
- Respondent has concerns with the robustness of this high level assessment of the potential heritage impact of the site and the highly precautionary conclusions reached by it. Indeed this assessment does not appear to take any account of the current state of the site which has been vacant for a number of years and contains a number of dilapidated buildings that have fallen into a state of disrepair and been subject to vandalism and arson. It also does not appear to

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have regard to the physical and visual separation of the site from the Grade II* Listed Knypersley Hall by the adjacent lake and a significant number of trees and dense landscaping. It also does not appear to take account of the potential benefits and positive impacts that could be achieved through the high quality residential redevelopment of this derelict brownfield site.

- Respondent has appointed an independent Heritage Consultant to undertake a more detailed assessment of the site to assess the potential impact of the residential development of the site on nearby heritage assets. A copy of their report is appended to the letter.
- The Heritage Impact Assessment prepared by Richard K Morris Associates confirms that the present impact on the setting of the Hall and its outbuildings by the remains of the walled garden is at best neutral, due to the absence of clear reciprocal views, the incomplete state of the original enclosure of the garden and the derelict condition of the buildings on the site.
- The Assessment concludes that the redevelopment within the walled garden will have a relatively minor visual impact on the setting of the Hall or outbuildings because of the limited reciprocal views and the distances involved.
- Richard K Morris Associates has identified clear potential to enhance the perceived historical setting of the Hall and its outbuildings through a considered development of the site.
- Overall, Richard K Morris Associates concludes that with good design and a well-considered layout, the residential development of the site would result in a minor degree of change to the setting of the Hall and its outbuildings but that such change could result in an enhancement of that setting through the renovation of a derelict site and the restoration of much of its basic historical character within the surviving elements of the landscape.
- Therefore, the negative score in the Sustainability Appraisal and conclusions of the Landscape Local Green Space and Heritage Impact Study (2016) are inappropriate and should be amended to reflect the conclusions reached by Richard K Morris Associates. The site should be afforded a better score than indicated in the Sustainability Appraisal (2017).
- Respondent's intention is to sell this site for development. Once the necessary planning approvals have been secured, the site is immediately available for residential development.
- The site is approximately 1 hectare in area. It is anticipated that it could be developed at a density of approximately 30 dwellings per hectare, which would reflect and respond to the density of nearby residential areas. This results in an indicative site capacity of 30 dwellings. This was reflected in the Council's previous Preferred Options Site Allocations document and SHLAA (2016) which indicated that the Council agreed that the site is capable of delivering circa. 30 dwellings.
- The site is in a sustainable, accessible location on the edge of Biddulph which is a focus for housing growth in the District.
- There are no significant technical constraints or issues that might prevent the development of the site for housing or make the development unviable or undeliverable.
- It is understood that a suitable access to the site could be provided from Orme Road. Indeed there has been no objection to the residential development of the site been raised by the Local Highway Authority or District Council
- Given the former use of the site as a garden centre it is not anticipated that there would be any issue or constraints to development in terms of ground conditions or contamination. It is also understood that, given the former use of the site, and its location contiguous with the settlement boundary and nearby residential

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development, the site could be easily linked to mains services. The site is also fairly flat and there are no evident constraints.

- According to the Environment Agency's Flood Risk Map the site is located entirely within Flood Zone 1 (i.e. at low risk of flooding with less than 1 in 1,000 annual probability of river or sea flooding).
- There are number of trees located within the site. However, the majority are located towards the site boundaries. Therefore, it is considered that the majority of the quality existing trees on the site could be effectively incorporated in to the design and layout of the site at a later stage. Moreover, the site is not subject to any designations relating to the conservation of ecology or biodiversity.
- By virtue of the site's former use as a Garden Centre and the built structures on the site, including various garden centre buildings and green houses, it is considered that the brownfield site does not effectively serve or perform the five purposes or functions of the Green Belt.
- The edge of the site is well defined and visually contained by the existing trees and soft landscaping which are located along its boundaries. The trees and change in levels at the site boundary sever the site from the Green Belt to the south, in physical and visual terms. This results in the site becoming a pocket of brownfield land that is visually isolated from the main area of Green Belt to the south. Therefore, development of the garden centre site would result in no visual impact on the openness of the Green Belt.
- The redevelopment of this brownfield site would not have any greater impact on the openness of the Green Belt or its function and would not constitute inappropriate development in the Green Belt.

Public Response

None received

Council Response

Proposed housing requirement is towards the top of the OAN range.

Flexibility - Policy H1 provides a degree of flexibility to allow consent to be granted on unallocated sites. In addition, Policy SS4 also commits the Council to monitor housing land supply and review the Local Plan if necessary to bring forward additional allocations. Combined, it is considered that the Local Plan provides sufficient flexibility to ensure the supply of housing land. Whilst the Core Strategy did include a 10% slippage allowance, its policies are more restrictive in terms of support for the development of windfall sites and sites outside of established development boundaries. Adding a slippage allowance into the housing requirements also has the consequence of increasing pressure for releasing Green Belt land which should only be proposed in exceptional circumstances.

20% buffer - Five year supply includes a 20% buffer to take account of past under delivery. Increasing Biddulph's housing requirement would necessitate further Green Belt release. However, this is not needed as the plan can already accommodate the plan requirement without further loss of Green Belt.

Evidence to support windfalls - windfall allowances in the plan (average 28%) are broadly in line with the Core Strategy (25% in urban areas 30% in rural areas). Allowances included in the plan are supported by an analysis of such provision since 2006 as follows:

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Leek

Large windfall allowance (15 per year) = 210.

Small windfall allowance (10 per year) = 140 Between 2006 and 2016 on average 12 new dwellings were delivered each year on small sites <10 dwellings. This was rounded down to 10 per annum.

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Large windfall site allowance (20 overall) = 20 Not many brownfield opportunities identified so figure of 20 considered appropriate.

Small windfall allowance (10 per year) = 140 Between 2006 and 2016 on average 8 new dwellings were delivered each year on small sites <10 dwellings. This was rounded up to 10 per annum.

Cheadle

Small windfall allowance (10 per year) = 140 Between 2006 and 2016 on average 11 new dwellings were delivered each year on small sites <10 dwellings. This was rounded down to 10 per annum.

Rural

Small windfall allowance (30 per year) = 420 Between 2006 and 2016 on average 23 new dwellings were delivered each year on small sites <5 dwellings. This was increased to 30 per annum to reflect increased flexibility for infill within and on the edge of the villages.

Furthermore, it should be noted that the Core Strategy adopted a more restrictive approach to supporting windfall than that now proposed. The Housing White Paper also expressed the Government's desire to amend the NPPF to provide additional support for small windfall development.

Commitments - NPPF footnote 11 states that "sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years..." The Council does not have clear evidence that extant permissions will not be implemented. As such, the plan counts all commitments towards the land supply.

The Council publishes residential commitments data in its Annual Monitoring Reports and Housing Land Supply schedules, on the Council website. These take account of 'expired' consents.

The National Planning Policy Framework directs Councils to fully meet their objectively assessed needs for housing over a 15 year (or similar) period during plan-making. Councils should be able to demonstrate 5 years' worth of deliverable housing sites against their wider requirements at any time. In addition Local Plans can provide for delivery of longer-term sites available after 5 years. However as the Government is seeking to significantly increase the supply of housing the phasing of allocations is generally only justified where there would be problems associated with

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delivery of housing or infrastructure across a District. Policy SS4 explains how the release of land for housing and employment across the District will be managed in accordance with the expectations of that Policy and delivery monitored regularly. If necessary the Council will review the Local Plan to bring forward additional sites for development.

Green Belt release is necessary in Biddulph to meet the town's future housing requirements. The Council's Green Belt Review recommends areas which could be considered for release. It also points out that exceptional circumstances would need to be demonstrated. It is considered that there are exceptional circumstances to justify the release of Green Belt land at Wharf Road and Tunstall Road (refer to the site proformas for details).

Site - Wharf Road

- The area is in more than one ownership.
- Potential noise levels from new development will be assessed at the time a planning application is being considered in accordance with the latest noise guidance available at that time which currently states that noise is a material consideration in the planning process and a key aspect of sustainable development.
- If the Council considered that a development may adversely impact on local air quality then the applicant is required to undertake air quality assessments to identify these issues and develop options to mitigate these impacts. In addition the Council continually monitors air quality across the District and regularly undertakes review and assessments of this data to identify areas where the traffic could have an unacceptable impact on local air quality. Policy SD4 covers controls of all forms of pollution arising from development.
- Policy DSB1 requires that the surveys and actions recommended by the Council's Extended Phase 1 Habitat Survey and Local Wildlife Assessment are implemented as well as provision of a landscaping plan. In addition, negative impacts should be avoided on the nearby Biodiversity Alert Site.
- The relevant site policy (Policy DSB1), requires comprehensive masterplanning of this area to include detailed investigation work in relation to the mining legacy of the site before development can commence. The mine entries on the site will not be developed over even when treated in line with Coal Authority advice.
- The Council's Green Belt Review concludes that land west of Biddulph Valley Way could be considered for release from the Green Belt provided that exceptional circumstances can be demonstrated. The exceptional circumstances relating to this site are that it will assist with bringing forward a large strategic mixed use regeneration site which is well related to the town centre and its key services and facilities. The Council has fully explored options for meeting its development needs without using Green Belt land. Biddulph is unique in that it is the only town in the Staffordshire Moorlands which is surrounded by Green Belt. This was taken into account at the time the Core Strategy was produced when Biddulph's housing proportion was less than the other towns at 20% of the total District housing figure to 2031. This proportion has been carried through into the Local Plan. Following recent consultation and evidence, the Council has reduced the amount of Green Belt land identified for development in Biddulph but there is not enough non-green belt land to meet all of the town's future development requirements.
- The Green Belt Review states that creation of a new settlement edge along the south-western boundary would prevent urban sprawl over the longer term. This

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is not explicit in the site policy DSB1 and it is considered appropriate to include this within the policy wording.

Site – Tunstall Road

The Green Belt Review concludes that this site can be considered for release from the Green Belt provided that exceptional circumstances can be demonstrated. The exceptional circumstances relating to this site are that it is ideally located with good road links opposite Victoria Business Park and bringing it forward will have a positive impact on the local economy. The site is intended primarily for employment use. The residential element is intended to support the delivery of the employment use to meet Biddulph's employment needs.

Sites – Yarn Mill & Minster Mill

The redevelopment of Yarn Mill and Minster Mill provides an opportunity to create high density residential development on these underused sites in the town centre. This is likely to take the form of new build apartments and it is considered that the relatively high density proposed is appropriate in this location.

Site – BD069

The Council's Heritage Impact work looks solely at this issue and does not take into account the current condition of the site or any other non-heritage issues.

NPPF paragraphs 130 to 135 set a very high bar in terms of heritage impact and the conclusion of the Heritage Impact work - that the site could not be developed without substantial heritage impacts - is a significant constraint.

The Green Belt sites proposed for allocation in Biddulph do not have such significant constraints.

Local Plan Publication (Submission Version February 2018)

Site suggested for residential development.

Council Response

This site was included as an option in the 2015 'Site Options' consultation and in the 2016 'Preferred Option Sites and Boundaries' consultation. However, following the results of heritage impact evidence and the emergence of an alternative more preferable site, this site was removed from the plan in 2017.

The Council's Heritage Impact Assessment raises concerns about the impact of new development on this site on neighbouring Knypersley Hall, a Grade II* Listed Building. This is a significant constraint. In relation to the objector's Heritage Impact Assessment by Richard K Morris and Associates, it is considered that this assessment understates the significance of historic features in the site, which comprise the walled garden and rock feature including the grotto, and their contribution to the setting and significance of Knypersley Hall. The original conclusions presented in the 2016 Study that development on the site would highly likely cause substantial adverse effects to the setting remains valid. The intensive redevelopment of the site to accommodate 30 dwellings would significantly weaken the ability to understand the site as a walled garden that was intrinsic to the development of works and ideas by Bateman. However, on the results of a detailed site visit and on consideration of the enhanced mitigation measures put forward by Richard K Morris and Associates, conclusions could be drawn that this harm could be

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reduced to a lower degree in the range of less than substantial harm, if the number of dwellings was significantly reduced. Notwithstanding this, the finding of less than substantial harm does not equate to a less than substantial planning consideration. Section 66 of the Planning (Listed Building and Conservation Areas) Act (1990) requires the decision maker, when considering applications which affect the significance of a Listed Building, to have "special regard" for the preservation of that listed building or its setting. This is amplified in the NPPF, where "great weight" is required. Following the recent High Court decisions (Barnwell, Forge Field and Mordue), there is a strong presumption against planning permission being granted where harm to a listed building through impacts to its setting is found. It remains that other sites highlighted for allocation within Biddulph were assessed as suitable for development in heritage terms. When compared to this site in heritage terms, they would be less constrained, and have a greater ability to meet housing figures. (Full analysis of the Richard K Morris & Associates report can be found in the evidence document entitled: Landscape, Local Green Space & Heritage Impact Study: Review of Representations May 2018).

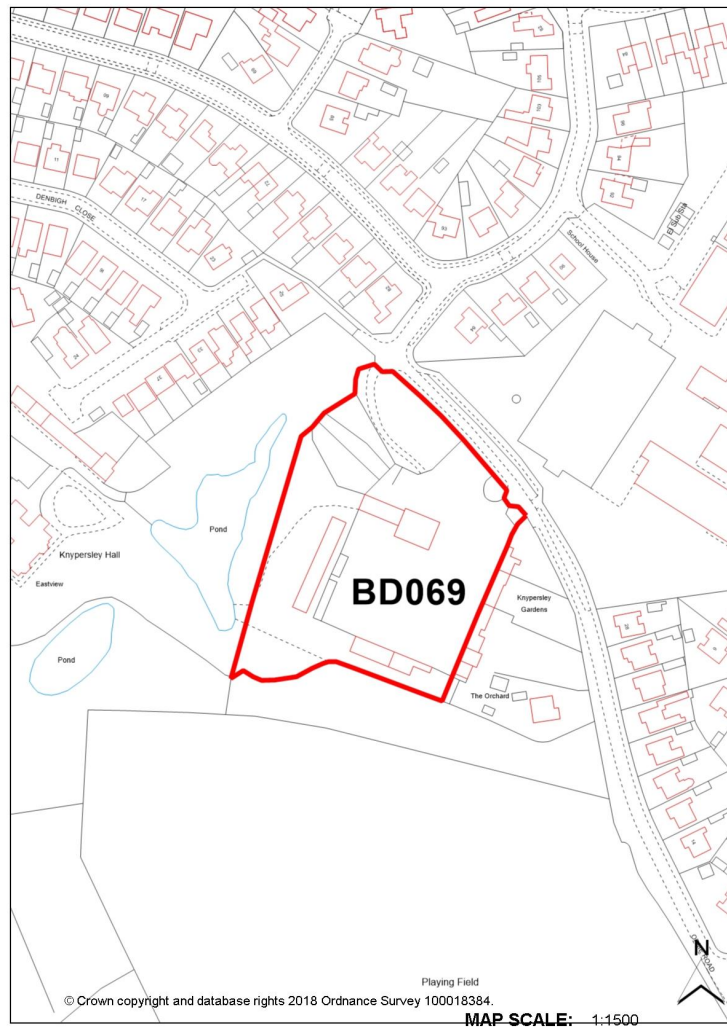
The Submission Version Local Plan seeks to deliver Biddulph's housing requirement whilst ensuring that Green Belt release is kept to a minimum. Approximately, 255 homes are now planned in land currently designated as Green Belt in Biddulph (part of Wharf Road and Tunstall Road sites) compared to 480 in the 2016 consultation. This has been achieved by amendments to the proposed allocations with consideration given to their respective planning merits. Considering these factors collectively, it is considered that there are exceptional circumstances to release these sites from the Green Belt.

An alternative approach of allocating a series of smaller sites around Biddulph for Green Belt release was considered but the Council felt that focussing development in two strategic areas had locational advantages – close to the town centre and Victoria Business Park and would form part of a wider regeneration opportunity to bring forward sustainable mixed use sites to benefit the town.

All the sites included in previous consultations have been assessed against Government policy and the evidence base, undergone consultation and sustainability appraisal. On planning balance the Council has concluded that the selected sites are the most appropriate solution for Biddulph.

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Picture 10.7

BD087 - (Objection to exclusion of site made at Submission Stage)

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Local Plan Process

- Site suggestion from the SHLAA
- Included in the options consultation July 2015
- Included in the Preferred Sites and Boundaries consultation April 2016
- Not included in Preferred Options Local Plan July 2017
- Not included in Submission Version Local Plan (February 2018)

Current Position

Site not taken forward into Submission Version Local Plan as:

- An alternative Green Belt site exists adjacent to Wharf Road which will assist with bringing forward a large strategic mixed use regeneration site which is well related to the town centre and its key services and facilities.
- Query over viability of developing the site due to the potential cost of a bridge over Biddulph Brook for a small site.
- On planning balance the Council has concluded that the selected sites are the most appropriate solution for Biddulph and minimise Green Belt release.

Key Issues

- Green Belt site – considered to be suitable for removal if exceptional circumstances are demonstrated.
- Access to site – owner states an agreement has been reached with County Highways involving provision of a bridge over the brook.
- Low landscape sensitivity and suitable for development in heritage terms.
- Ecology – Further survey work recommended in order to establish SBI/BAS status.
- Adjacent to brook – site boundary has been pulled back to exclude Flood Zone 2 with possible reduced capacity.
- Close to operational United Utilities Waste Water Treatment Facility – developer has undertaken noise and odour reports. The noise report concludes that the site is not affected and no specific noise mitigation measures will be necessary. The odour report concludes that odour impacts at the site would not be significant and that they should not be a constraint to development.

Site Information

Greenfield/ brownfield	Built up area boundary/ countryside	Est. housing capacity	Area (ha)	Ownership status	Site details
Brownfield former nursery	Countryside Green Belt	15 (could be reduced due to amended site boundary)	0.8 (excludes Flood Zone 2)	Owner supports development	<ul style="list-style-type: none"> • Close to water treatment works • Access over Biddulph Brook

Studies

Agent acting on behalf of landowner has submitted:

- Concept Masterplan
- Highways correspondence
- Drainage correspondence

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- Odour Impact Assessment
- Noise Assessment
- Environmental Health correspondence

Green Belt Review 2015

(Appraised sites according to their contribution to Green Belt Purposes)

Check Sprawl: Limited contribution

Maintain Separation: Limited contribution

Prevent Encroachment: limited contribution

Preserve Setting: Contribution

Overall Impact on Green Belt Purposes: Limited

A well contained site which would round-off existing development in this location, comprising a reasonable outer boundary of Biddulph Brook. Development would narrow views of open countryside to the north as viewed from Marsh Green Lane.

Recommendation: Consider for release

Phase 1 Habitat Survey 2015 (FID 24)

The site has mostly low biodiversity value overall in terms of the species poor grassland area, and has been given ecological importance in terms of loss within the wider countryside due to the potential presence of reptile populations. The following surveys/ actions are therefore recommended prior to any potential development works being carried out:

- Reptile survey
- Vegetation removal at the appropriate time of year

Local Wildlife Assessment (ECUS, 2016)

The site has low ecological value in its potential to support protected species. The site habitats are considered to be of nature conservation value at site level only. However, more information is required regarding the presence/absence of reptiles on site.

The following surveys/ actions are therefore recommended in order to establish SBI/ BAS status:

- Reptile survey required.

Landscape, Local Green Space & Heritage Impact Study (August 2016)

Landscape Results

Site comprises land to rear of linear development on the A527, to the north of the settlement. The site slopes down from this linear development towards Biddulph Brook (located to the west of the site), and is visible from the opposite side of the valley. However, development within the site would be partially screened by trees along Biddulph Brook and would be viewed against the context of the existing development. In addition the site does not extend beyond the existing settlement edge formed by development on Beaumont Close.

Site is of low landscape sensitivity.

Heritage Results

There are three Grade II* and 21 Grade II Listed Buildings, one Scheduled Monument, and a Registered Park and Garden which is also a Conservation Area within the 400m buffer. The site is located behind existing housing. The tower of the Grade II* listed church was visible from the site but it is considered that the

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development would be highly unlikely to adversely affect the setting of the asset. Due to the intervening buildings and vegetation, development would be unlikely to cause high adverse effects to the understanding of the Registered Park and Garden and Conservation Area. The site is within the HLC zone BBHECZ 17 and the HEA states that designated heritage assets would require consideration (Historic Environment Character Assessment 2010).

Site suitable for development in heritage terms.

Sustainability Appraisal

Sustainability Appraisal Submission Version June 2018

The proposed delivery of circa 25 dwellings is considered to have a significant positive effect, as could the site's proximity to existing areas of employment. The site is also accessible to existing services and facilities which is likely to have a positive effect. However, the site is located within a flood zone which is likely to have a significant negative effect. The development of greenfield land (indicated on the predictive map of Best and Most Versatile agricultural land as urban / industrial) and the site's proximity to heritage assets and an LNR is likely to have a negative effect, as could the site's ecological value.

The site comprises land to rear of linear development on the A527, to the north of the settlement. It is likely to be affected to some degree by flood risk; allocation will require the support of the Sequential Test and a level 2 SFRA. The Council's Green Belt review has recommended that the site is considered for release from the Green Belt if exceptional circumstances can be demonstrated.

This site was taken forward as a preferred option for consultation in April 2016. The Extended Phase 1 Habitat Surveys and Local Wildlife Site Assessment (May 2017) considered that the site has low ecological value in its potential to support protected species. The site habitats are considered to be of nature conservation value at site level only. However more information is required regarding the presence or absence of reptiles on site.

The site was considered by the Council's Landscape, Local Green Space and Heritage Impact Study (August 2016) to be of low landscape sensitivity. The study found that the site slopes down from linear development on the A527 towards Biddulph Brook (located to the west of the site), and is visible from the opposite side of the valley. However, it was considered that development within the site would be partially screened by trees along Biddulph Brook and would be viewed against the context of the existing development.

There are three Grade II* and 21 Grade II Listed Buildings, one Scheduled Monument, and a Registered Park and Garden which is also a Conservation Area within the 400m buffer. The site was considered by the Council's Landscape, Local Green Space and Heritage Impact Study (August 2016) which notes that whilst the tower of the Grade II* listed church was visible from the site - development would be highly unlikely to adversely affect the setting of the asset. Also, due to the intervening buildings and vegetation, development would be unlikely to cause high adverse effects to the understanding of the Registered Park and Garden and Conservation Area.

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The site boundary requires amendment to exclude land within the floodplain, this is likely to reduce site yield.

The site is close to United Utilities water treatment works - master-planning may be required in order to mitigate the risk of odour and noise nuisance. Any masterplan should also demonstrate how a development scheme will contribute to the priorities and actions proposed for the Biddulph strategic GI corridor (as set out in the Green Infrastructure Strategy), including by supporting public access on to the Biddulph Valley Way and should take account of potential ecological value.

The site was not proposed for inclusion in the July 2017 preferred option Local Plan.

Initial HRA Screening

No Likely Significant Effects (LSEs) have been identified in relation to the preferred option site allocations in Biddulph.

Minerals

In Mineral Safeguard Area for 'Superficial Sand and Gravel'. Any application should be accompanied by a Mineral Safeguarding Statement. Developers should take account of the requirements of Policy SD1 (5) and investigate the potential for using in-situ minerals in construction works.

Options Consultation July 2015

Statutory bodies/stakeholders

SCC Highways - Visibility splays of 2.4m x 90m are required at Beaumont road onto Marsh Green Road. These cannot be provided without third party land. If this site is to be developed, an alternative access must be provided, or land acquired. There is a public right of way between Beaumont Close and the plot. Could Marsh Green Road be realigned into plot BD068?

Environment Agency – Site is likely to be affected to some degree by flood risk and if taken forward will require the support of the Sequential Test and a Level 2 SFRA. Need to have regard to the relevant River Basin Management Plan.

Historic England: Made no comments on individual sites recommended that a heritage impact assessment of sites is carried out.

Coal Authority: Staffordshire Moorlands is an area where there have been significant coal mining activities which have left a legacy. Recommend that sites are assessed to determine if there coal related hazards which require remediation and the likely impact on mineral resources. Previous coal workings do not prevent development of sites and therefore do not wish to recommend any sites are excluded from assessment on mining legacy grounds.

United Utilities, Severn Trent, Heritage England, Natural England, Network Rail; no site specific comments

Developer/Agent/Owner Support development of this site. Compliant (subject to conditions) with Environmental Health, Environment Agency, United Utilities and Highway Authority requirements. Major supermarket less than one mile from site,

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churches and schools within easy walking distance, main line railway station at Congleton is just 4 miles away, close to A34 which connects to M6.

Public response 46 comments – all objections.

Issues raised:

- Infrastructure - Schools oversubscribed.
- Infrastructure - Traffic / Transport - difficult access from Beaumont Close - previously refused as access when considering site for extension to graveyard (also would have to cross a public footpath and difficult HGV access, safety risk - no pavements in close, impassable in icy conditions) or over Biddulph Brook, Marsh Green Road and bridges cannot cope with more traffic especially HGVs - too narrow, junction on Congleton Road with Woodhouse Lane and Marsh Green Road is already dangerous for traffic, pedestrians, dog walkers, cyclists and horse riders, has no footpaths and not wide enough to provide any, cumulative impact on transport network of developing all sites put forward in this area, Congleton Road already very busy, traffic pollution.
- Infrastructure - Other - amenities are not sufficient for current residents - how would emergency services, doctors and dentists cope? No public transport so no access to shops without a car, does sewage works have capacity? A number of drainage pipes run under this site from properties on Congleton Road which are legally agreed and have right of access plus would also require access to maintain existing rear fencing. As site is lower than sewage works, waste from new houses would be pumped up but if pumping facility in flood plain, could result in raw sewage entering the brook, public transport northwards finishes at 6pm. Current deficit in public open space and severe deficit in children's play areas.
- Landscape - destroy natural beauty of the area.
- Nature Conservation - detrimental impact on flora and fauna - ducks and herons use the riverbank, badgers and foxes present on site, bats, frogs, toads, thrush, stoats, squirrels etc. plus loss of trees.
- Flood Risk - Prone to flooding - partial floodplain, next to stream, wet ground conditions, potential problems obtaining home insurance, concern about who would be financially liable if any properties on this site flood in future - would it be the District Council? Surface water will find its way into sewerage system which cannot cope at present due to design / construction of town sewer causing flooding in Willow Heath - United Utilities say this cannot be solved without considerable funds.
- Amenity (e.g. noise, privacy, loss of light) - Too close to sewage works which is prone to noise, smell and insects and not heavily screened during winter. Refer to Government's "Code of Practice on Odour Nuisance from Sewage Treatment Plants". Loss of amenity in terms of light, noise and privacy for existing residents, over-bearing and oppressive impact on houses in Beaumont Close.
- Scale of development - overdevelopment, out of character with local area.
- Government Policy - Land is Green Belt and should be protected from development. Not in line with NPPF re: protect and enhance natural, built and historic environment helping to improve biodiversity, use of natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.
- Other - Query whether development would be cost effective taking into account constraints, loss of agricultural land, use brownfield sites instead, Contamination

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of Biddulph Brook by construction work is a concern, fear of crime, lack of demand - units at Uplands Mill are not selling, concerns about in-migration, SHLAA forms focus on one site only and don't consider implications arising from a number of neighbouring sites being developed and some arguments applicable to more than one site have only been used on one record but not others e.g. highway infrastructure, loss of wealth in Biddulph economy by residents moving away, Biddulph is known as a 'Garden Town', development may put off inward investors, no additional jobs proposed, town centre is declining, need for new houses / flats in town centres, existing empty properties in town centres, concern about anti-social behaviour from residents of social housing, residents do not understand abbreviations used on SHLAA form and would like to see information landowner has provided to Council, poor awareness of consultation - expect to be written to personally about developments affecting them.

Council response –

- The District Council is working with the County Council on the issue of school capacity. The County has determined that additional school provision would be required to support housing growth at the Primary phase of education. At this early stage in the site selection process there are a number of options for delivering school capacity dependant on the sites selected to take forward.
- The Highway Authority considers that this development is acceptable subject to detailed design issues. The landowner considers that the issue of access to the site can be resolved and discussions with the highway authority have been held. Public footpaths can be provided as part of a development scheme. Cumulative impact of several developments in this area would be assessed through a TA.
- New development is the main way to deliver new or improved infrastructure e.g. more residents may support an improved bus service and medical facilities. Infrastructure needs specifically related to a new development will be provided as part of that development e.g. children's play areas. Rights of access in relation to the site is a matter to be resolved by the landowner and the other parties involved.
- United Utilities has advised that if appropriate measures for surface water disposal are included within development schemes then there should be no detrimental impact on the capacity of their infrastructure.
- The Council has recently completed a Level 1 Strategic Flood Risk Assessment for the District, the results of which are being used to inform the site selection process. Where necessary, additional assessment work will be undertaken in line with Environment Agency requirements. Mitigation measures will be taken as part of the site development to address any surface water issues.
- The land in question is not highlighted as significant in the Council's Landscape & Settlement Setting Assessment. A Landscape & Visual Impact Assessment will be undertaken during the plan production process and look at all preferred option sites suggesting mitigation measures where appropriate. The results will be incorporated into the Submission Version of the Local Plan.

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- The Council has recently completed a Phase 1 Ecological Study for the District. This assessed sites included in the Site Options consultation. The site survey results will be used as part of the site selection process.
- Amenity – issues such as loss of light, noise and privacy as well as other impacts on existing residents will be assessed in detail once a site layout has been determined at the time a planning application is received and residents will have the opportunity to comment on the content of that application.
- An odour assessment of the sewage works has been undertaken on behalf of an adjacent landowner and it concludes that the vast majority of the area is suitable for residential use (any which is not can be left undeveloped) and odour issues should not be viewed as a constraint to planning consent.
- The land in question is within the Green Belt. In order for Biddulph to accommodate new development, the Green Belt boundary will need adjustment as there are not enough sites in the existing settlement boundary to accommodate the level of development needed. The Council has recently completed a Green Belt Review in order to assess parts of the Green Belt where minor adjustments can be made without having an impact on the function of the Green Belt as a whole (as defined in government planning guidance). This study recommends that BD087 is considered for release from the Green Belt.
- The landowner has undertaken some initial assessments and considers that the site is viable for development.
- The land has an agricultural land classification of grade 4 which means that it is poor quality.
- The SHLAA has assessed more than 150 sites in and around Biddulph including brown field sites and these have been included as allocations where they are suitable, available and deliverable. However, there is not enough brownfield land to meet the town's requirements so green field sites also need to be included. Sites BD071 and BD071a have been included as potential allocations. Prioritising brown field land is no longer part of Government policy.
- The new Local Plan will cover a period to 2031 so lack of demand (perceived or actual) at one point in time is not a valid reason for not meeting the area's objectively assessed housing needs.
- Cumulative impact of developing a number of sites in one area is and will continue to be considered as part of the process, particularly in terms of transport and infrastructure.
- New employment land is proposed at the south of the town (BD117). New investment in the town would have knock-on positive effects for the town centre.
- The Council's evidence demonstrates a need for affordable housing in Biddulph and this is reflected in local policy (set out in the Core Strategy). The Council is required to seek to address this need.
- Housing requirements in the Staffordshire Moorlands are in addition to existing properties even if these are for sale or derelict.

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Preferred Sites & Boundaries 2016 Consultation

Statutory bodies/stakeholders

United Utilities: We wish to emphasise the need to carefully consider the allocation of new housing sites in close proximity to our wastewater treatment works. In this regard we note that our wastewater treatment works (WwTW) in your local authority include: Biddulph WwTW; Biddulph Park WwTW; and Flash WwTW. We wish to highlight that a wastewater treatment works can result in emissions which include odour and noise. Therefore if you are considering any sites for new allocations, especially housing allocations, near to a wastewater treatment works, you should carefully consider the sites with your Environmental Health colleagues. This is important when comparing sites close to treatment works with potential alternative sites that may be available to you for allocation. This reflects our earlier correspondence to you. The position of United Utilities is that when considering a range of sites to meet housing needs, it would be more appropriate to identify new housing sites, which are sensitive receptors, that are not close to a wastewater treatment works. We note this point is particularly relevant to your assessment of sites considered for allocation in Biddulph as part of the current Preferred Options Sites and Boundaries consultation. In particular, site references BDO68, BDO62 and BDO87, which are sited in close proximity to Biddulph Wastewater Treatment Works. Notwithstanding this preference, if it is still intended to progress with the allocation of sites near to a wastewater treatment works for housing following discussions with your Environmental Health colleagues, we strongly recommend that your decision should be informed by: 1. an odour impact assessment; and 2. a noise assessment. If after having undertaken these assessments you still allocate land near to the wastewater treatment works for housing, we recommend that there should be detailed associated policy which identifies the need for mitigating measures including any that may be identified as a result of the assessments. We recommend that: 3. careful masterplanning is always prudent in order to mitigate the risk of odour and noise nuisance. For example, any on-site open space should be located so as to act as a buffer between the treatment works and any newly introduced housing. In addition the houses could be orientated so to most appropriately manage the impact of noise; and 4. appropriate soft landscaping is included to strengthen the buffer between the treatment works and the proposed new development.

Further United Utilities Comments May 2017

With respect to any flooding implications, United Utilities wishes to recommend:

1. The need for foul only flows. Surface water should discharge to a more sustainable alternative than the public sewer; and
2. In advance of submitting the application and once more details are known in respect of the proposed development, the applicant should engage in pre-application discussions with United Utilities so that the most appropriate point of connection to the public sewer can be determined for foul water. The point of connection that is agreed for foul water may then be subsequently specified in any planning conditions recommended to the local planning authority.

Council Response:

Comments noted.

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Noise and odour reports have been received from the developer very recently. The noise report concludes that the site is not affected and no specific noise mitigation measures will be necessary. The odour report concludes that odour impacts at the site would not be significant and that they should not be a constraint to development. Both reports will be supplied to Environmental Health section for comments.

It is now up to the Council to balance the planning issues in determining whether to select this site for development in the Local Plan.

Detailed associated policy for the site will be included in the Local Plan if it is selected and it is acknowledged that careful masterplanning of the site will be required including appropriate screening /buffering." Similarly, the recommendations above will be incorporated into policy should the site be taken forward.

Staffordshire County Council: With regards Site BD087 as stated in previous responses there is still no obvious access to this site. We will need to see this before we can provide a comprehensive response.

Council Response

The landowner has corresponded directly with the County Highways Officer for the Staffordshire Moorlands and provided evidence that the principle of providing an access from the opposite side of Biddulph Brook using a newly constructed bridge would be acceptable to the highway officer.

Environment Agency: In particular, BD087 will need to be assessed before being taken further. A level 2 assessment will be required.

Public comments:

Issues raised:

- Highways including access.
- Noise and odour, existing raw sewage flooding, capacity of water treatment works.
- Flood Zone 2.
- Education capacity
- Victoria Colliery, Childerplay and north of Woodhouse Lane as alternative locations for development.
- Ecology.
- Community benefit
- Viability of sites
- Allocating the site as Visual Open Space.
- Contradiction with Core Strategy Policy SS5b
- Green Belt Review and exceptional circumstances justifying development in the Green Belt
- Site screening
- Use of derelict buildings in Biddulph.
- Heritage impact.
- Landscape impact.
- Public open space.
- Amenity issues.
- Marketing of the consultation.

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- Develop sites in Stoke instead.
- Housing requirement for Biddulph too high.
- Property values.
- Affordable housing

Council Response

- **Highways including access.**
County Highways has stated that the landowner's proposed access (a bridge crossing Biddulph Brook) would be acceptable in principle.
- **Noise and odour, existing raw sewage flooding, capacity of water treatment works.**
United Utilities has a statutory duty to provide capacity for new development so this is not a valid reason for development not to come forward in Biddulph. United Utilities considers that there is no need to expand the treatment works in the development plan period for the growth identified in the development plan.

Noise and odour assessments have been undertaken on behalf of the landowner which demonstrate that the site could be developed without significant adverse impact on future residents.

Current issues experienced by residents in regard to raw sewage flooding are a separate matter to be investigated by United Utilities.
- **Flood Zone 2.**
The site boundary has been amended to exclude land within Flood Zone 2. This approach has been agreed with the Environment Agency since their response to the consultation so a Level 2 Flood Risk Assessment is no longer required for the site. A planning application would still be needed before this (or any other) site could be developed and the Environment Agency is a statutory consultee.
- **Education capacity**
Education - The District Council is working with the County Council on the issue of school capacity. The County has determined that additional school provision would be required to support housing growth at the Primary phase of education. At this early stage in the site selection process there are a number of options for delivering school capacity dependant on the sites selected to take forward.
- **Victoria Colliery, Childerplay and north of Woodhouse Lane as alternative locations for development.**
Sites at Victoria Colliery and Childerplay Road are within the Green Belt like BD087. The Green Belt Review has considered the impact on the Green Belt the release of these sites for development would have. Only the Victoria Colliery site was identified as being suitable for consideration for Green Belt release (in exceptional circumstances). In reaching a decision on which sites to include in the Local Plan, the Council must balance evidence and Government policy.

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The land to the north of Woodhouse Lane (west of the school) is not considered suitable for development, mainly due to the heritage impact on the nearby registered park and garden. It is also Green Belt land.

- **Ecology**
The Council's Phase 1 Habitat Study (2015) concludes that "The site has mostly low biodiversity value overall in terms of the species poor grassland area, and has been given ecological importance in terms of loss within the wider countryside due to the potential presence of reptile populations. The following surveys/ actions are therefore recommended prior to any potential development works being carried out:
 - Reptile survey
 - Vegetation removal at the appropriate time of year"
- **Community benefit**
Site BD087 will be required to provide a percentage of affordable housing / starter homes to benefit those in the community needing affordable housing.
- **Allocating the site as Visual Open Space.**
The site is not recommended for designation as Local Green Space in the Landscape, Local Green Space and Heritage Impact Study (2016). Local Green Space supersedes the Visual Open Space designation (which is an old designation not supported by Government policy in the NPPF).
- **Contradiction with Core Strategy Policy SS5b**
No contradiction with SMDC Core Strategy Policy SS5b 'Biddulph Area Strategy'. Sites within the urban area and an extension to the urban area are included as well as extensions in the Green Belt identified as part of the Green Belt Review as stated in the policy.
- **Green Belt Review and exceptional circumstances justifying development in the Green Belt**
In order for Biddulph to accommodate new development, the Green Belt boundary will need adjustment as there are not enough sites in the existing settlement boundary to accommodate the level of development needed. The Council has completed a Green Belt Review in order to assess parts of the Green Belt where minor adjustments can be made without having an impact on the function of the Green Belt as a whole (as defined in government planning guidance). This study recommends considering site BD087 for release from the Green Belt.

If this site is selected as a housing allocation, exceptional circumstances will need to be demonstrated to justify its release from the Green Belt.
- **Site screening**
Screening of the sewage works would be required as part of any development on the site.
- **Use of derelict buildings in Biddulph.**
Brown field sites have been considered as part of the site selection process and it is agreed that the mills in the centre of Biddulph (particularly Yarn Mill and Minster Mill) would be appropriate for residential development. Albion Mill on Station Road is too small for an allocation of its own but if it is

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developed it would count towards Biddulph's housing needs. The Biddulph Neighbourhood Planning Group are currently working on a Town Centre Masterplan which includes looking at opportunities for redeveloping brownfield sites.

- **Heritage impact.**
Heritage Impact of development on the site has been assessed in the Council's Heritage Impact Study (August 2016), the results for this site are "There are three Grade II* and 21 Grade II Listed Buildings, one Scheduled Monument, and a Registered Park and Garden which is also a Conservation Area within the 400m buffer. The site is located behind existing housing. The tower of the Grade II* listed church was visible from the site but it is considered that the development would be highly unlikely to adversely affect the setting of the asset. Due to the intervening buildings and vegetation, development would be unlikely to cause high adverse effects to the understanding of the Registered Park and Garden and Conservation Area. The site is within the HLC zone BBHECZ 17 and the HEA states that designated heritage assets would require consideration (Historic Environment Character Assessment 2010). Site suitable for development in heritage terms."
- **Landscape impact.**
Landscape Impact of development on the site has been assessed in the Council's Landscape Impact Study (August 2016), the results for this site are: "Site comprises land to rear of linear development on the A527, to the north of the settlement. The site slopes down from this linear development towards Biddulph Brook (located to the west of the site), and is visible from the opposite side of the valley. However, development within the site would be partially screened by trees along Biddulph Brook and would be viewed against the context of the existing development. In addition the site does not extend beyond the existing settlement edge formed by development on Beaumont Close. Site is of low landscape sensitivity."
- **Public open space.**
The land is privately owned.
- **Amenity issues.**
Issues such as overlooking will be assessed in detail once a site layout has been determined at the time a planning application is received and residents will have the opportunity to comment on the content of that application. Problems arising from the construction period of any works, e.g. noise, dust, construction vehicles, hours of working (covered by Control of Pollution Acts) are not material planning considerations.
- **Marketing of the consultation.**
The consultation was widely publicised and included a flyer being sent to all households and businesses in the District through Royal Mail. High levels of responses have been received by the Council from Biddulph residents which suggests that a significant number of residents knew about the consultation.
- **Develop sites in Stoke instead.**

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National planning guidance states that the Council should seek to meet the development needs of their area. Stoke on Trent City Council has its own development needs to meet.

- **Housing requirement for Biddulph too high.**
The proportion of 20% of the District's housing development taking place in Biddulph has been through extensive consultation and public examination as it is taken from the Council's Core Strategy which was adopted in March 2014.
- **Property values.**
Property values are not considered material in planning law.
- **Affordable housing**
Provision of affordable housing is enshrined in Government policy.

Preferred Options Local Plan July 2017

This site was not included as a Preferred Option by the Council in July 2017.

Land owner has objected to the non-inclusion of this site in the Local Plan through their agent. Summary of objections raised and council response:

Developer/Agent/Owner

- Agrees with the Council's position that development should be distributed towards the larger settlements as opposed to rural areas. Having said that, the Council proposes that only 20% of this growth should be directed towards Biddulph and 30% towards Leek and 25% towards Cheadle. Respondent suggests, given the position of Biddulph in the settlement hierarchy as one of three large settlements, that additional development should be directed towards Biddulph. This would reflect the percentage of development in the other large settlements within the Borough.
- In terms of the Council's housing requirement, the Council have suggested that their need for the plan period 2016-2031 is an additional 6,080 dwellings. This equates to an annual average of 320 homes per year. Whilst respondent is not suggesting that this figure is incorrect, they wish to highlight that this target is almost the same figure as is suggested in the adopted Core Strategy (2014). Policy SS 4 of the Core Strategy suggests that the requirement for Staffordshire Moorlands over the plan period (2006 to 2026) is 6,000 dwellings. Given that this requirement is virtually identical, respondent queries why the Council did not proceed with the Site Allocations DPD as opposed to re-writing the plan in its entirety. Indeed this will only add to further delay in the provision of much needed houses, which have been compounded in recent years by the distinct lack of delivery.

Council Response

Spatial Strategy seeks to preserve Green Belt as far as possible whilst supporting growth in Biddulph. Local Plan housing requirement is backdated to take account of shortfall in provision in recent years.

Developer/Agent/Owner

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- Proposes that BD068 and BD087 are included in the Plan, for residential development.
- BD068 and BD087 are located adjacent to the urban edge of Biddulph, 1.57km from the town centre. The town centre offers a range of services and facilities.
- Site BD068 is bound by existing residential development, with Portland Drive to the south and east, Biddulph Brook to the west and Marsh Green Road to the north. The site has a stone wall boundary with Marsh Green Road and is heavily screened from the neighbouring sewage works to the west of the site.
- Site BD087 is also bound by existing residential development to the south, north and east, and Biddulph Brook to the west.
- Both sites are located within the Green Belt.
- Both sites are located in Flood Zone 1, with an area of Flood Zone 2 and 3 along the brook. None of the sites which has been included in the Concept Plan (submitted as part of respondent's representation) are located in Flood Zones 2 and 3.
- Several public sewers cross the site. However, these could be easily relocated and/or reflected in the layout.
- There are no listed buildings within the confines of these sites. However, Ringwork Castle in Baileys Wood (located 240m to the north of the northern parcel and Biddulph Grange) is a Scheduled Ancient Monument. A Grade I listed Park and Garden is located on the opposite side of Congleton Road (150m from the site) and a Grade II listed Church is located 100m to the west of the site, with the top of the church being visible from the site. There is, however, a row of existing residential development on Congleton Road.
- Both sites are located in a sustainable location, 580m from Woodhouse Middle School, 370m from St Lawrence's and 550m from a convenience store. Within the settlement, there are a number of services and facilities available, including: a supermarket, pub, restaurant, library, post office, town hall, shops, a pharmacy and a doctor's surgery.
- Respondent has attached a Concept Layout Plan, which demonstrates that the site (split into two parcels) is capable of delivering approximately 100 dwellings. Up to 20 dwellings will be delivered on BD087 and up to 80 dwellings on BD068. As shown in the attached plan, development can be accommodated on site whilst still retaining much of the existing vegetation. This is at the same time as including public open space and implementing sustainable drainage systems.
- Both parcels would be accessed via Marshgreen Road, which is considered acceptable by the County's Highways team, subject to a Transport Assessment. The norther parcel would be accessed through an extension and improvement to the current bridge over Biddulph Brook.
- The Concept Layout Plan further confirms the merits of the site for future residential development and Green Belt release.

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- The land highlighted in blue on the Concept Layout Plan is proposed to be used for the benefit of the local community. The owner has suggested numerous uses for this land, including a residential care home, doctor's surgery, crechè, nursery, etc. As well as providing high quality housing on this site, the nearby community and new residents would reap significant benefits from these additional local facilities. This is considered to be a key benefit of developing this site in particular for residential development and as such, should be taken into consideration.
- The release of the site from the Green Belt is supported in the Green Belt Review Study. This study was initially produced as part of the Local Plan evidence in November 2015. This site, BD068 and BD087, was assessed as part of the initial review carried out in November 2015 and was found to overall have a limited impact on the Green Belt purposes of development. Both parcels are rated as having a limited contribution to the Green Belt for 3 purposes (check sprawl, maintain separation and prevent encroachment) and as having a contribution for one purpose (maintain separation).
- In summary, the review states that BD068 is effectively part of the built envelope of Biddulph in this location and could be developed without impinging on the wider Green Belt either physically or visually. In terms of BD087, the parcel is a well contained site which would be round-off existing development in this location, comprising a reasonable outer boundary of Biddulph Brook.
- The allocation BDNEW is located in the Green Belt. This site was not reviewed as part of the initial review or the additional sites review in September 2016 but was reviewed in April 2017. This site scores higher than sites BD068 and BD087 in terms of its contribution to the purposes of the Green Belt. BDNEW is considered to make a contribution to the Green Belt on 3 of the purposes (check sprawl, prevent encroachment and preserve setting) and a limited contribution to one of the purposes (maintain separation). Overall, the review found that development would compromise the openness of the Green Belt in this location by virtue of extending the built edge of Biddulph into the wider countryside.
- Given that BDNEW is considered to have a greater contribution to the Green Belt than BD068 and BD087, respondent encourages the Council to justify why this site has been chosen instead of other sites, which contribute less to the purposes of the Green Belt.

Suitability of the site for residential development

- The land at Marshgreen Road does not suffer from any technical constraints, which is demonstrated through the owners engagement with a number of key statutory consultees and production of key reports. Below is a summary of the outcome of this correspondence and reports.

Highways

- Correspondence from David Plant, a project engineer from the Highways Team at Staffordshire County Council, confirmed that providing access from the opposite side of Biddulph Brook is accepted in principle, subject to the provision of visibility splays and appropriate access. For a scheme greater than 80 dwellings, which is what respondent is proposing, a Transport Assessment would be required. As such,

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residential development on this site is considered as acceptable from a highways perspective.

Drainage

- Correspondence from Jillian Walker from the Developer Services and Planning Team at United Utilities (UU) confirmed that UU had/have no objection in principle to the proposed development provided that the site is drained on a separate system with all surface water flows generated, discharging directly into the adjacent watercourse. As stated above, given that public sewers cross the site, a modification of the site layout or a diversion of the public sewer would be necessary. This, however, would not be a constraining factor preventing residential development.

Flooding

- Although the site is located adjacent to a Flood Zone 2/3 area, the boundary has been pulled back to exclude the area in Flood Zone 2/3. As such, respondent does not believe that this would constitute an issue to prevent development of the site.

Odour impact

- An Odour Assessment, carried out by REC Ltd in May 2017, concluded that odour impacts at the proposed development site would not be significant and they should not be a constraint to planning permission. Development of the site would not be expected to expose future users to unacceptable odour concentrations and as such, residential development is acceptable on this site.

Noise Assessment

- A Noise Assessment, carried out by Echo Acoustics in June 2017, concluded that both sites BD068 and BD087 can be suitably developed for residential use and that noise need not be a reason for refusal of planning permission. Noise mitigation measures were recommended on parcel BD068, which would be implemented as part of development scheme to protect the amenity of current and future residents. These included, the orientation of the facades, the specification of ventilation units and the installing up-rated glazing.

Environmental Health

- Correspondence with the Council's Principal Environmental Health Officer (EHO), Mike Towers, confirmed that there is no significant complaint history regarding odour or insect activity associated with the sewage works. In addition, the EHO confirmed that there is no known mining activity or mineshafts under the two sites. As such, respondent sees no environmental health issues which would prevent development on this site.

Landscape/Heritage

- As suggested in the Council's Pro Formas for the Preferred Options Sites and Boundaries Consultation (April 2016), there are no landscape or heritage issues in relation to development on the site. This is confirmed in the Council's Heritage Impact Study, published in August 2016. The study found that both parcels are suitable for development in heritage terms. Due to the intervening buildings and

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vegetation, development on this site was found to be unlikely to cause high adverse effect to the understanding of the Registered Park and Garden/listed buildings. These proformas also highlight that the site is of a low landscape sensitivity. As such, there are no issues in terms of landscape or heritage which would prevent development on this site.

Ecology

- An ecology report has not been completed for the site, however, the Council's Pro Formas for the site for the Preferred Options Sites and Boundaries Consultation found that site BD087 has mostly low biodiversity value overall in terms of the species poor grassland area. Parcel BD068 is deemed to have ecological importance due to the presence of trees, however, as shown in the submitted concept plan, the trees within and around the site are intended to be retained. The Pro Forma states that there is no evidence at present to suggest that the site cannot be developed for ecological reasons and as such, the site should not be considered as unsuitable for residential use. In any case, prior to any potential development works, a bat survey, reptile survey and badger survey will be completed.
- In summary, this site is supported in the Council's Pro Formas for the site for the Preferred Options Sites and Boundaries Consultation. The proforma states that the only reason as to why the site has not been taken forward to the Preferred Options stage is that an alternative site exists (Wharf Road). As such, respondent encourages the Council to reconsider this site (parcels BD068 and BD087) for residential development.

Council Response

Would query the nature of the exceptional circumstances which exist to support the removal of BD068 and BD087 from the Green Belt and whether they are site specific.

Developer/Agent/Owner

- The Council have demonstrated a consistent under-delivery of housing since 2012. As such, in line with Paragraph 47 of the NPPF, respondent suggests that at least a 5% buffer or at best, a 20% buffer should be added to the housing requirement for the Borough to assist with deliverability. A 5% buffer would be an additional 304 dwellings and a buffer of 20% would be an additional 1,216 dwellings. As shown in the attached Concept Layout Plan, this site can deliver an additional 100 dwellings, which is 1.6% of the current housing requirement. Respondent urges the Council to consider adding a buffer to the housing requirement to support deliverability.
- Paragraph 47 of the NPPF highlights the importance of ensuring choice and competition in the market for land. By allocating one large site, this does not promote choice or competition for land, as all housing for Biddulph will be delivered in this one location. By allocating additional smaller sites, this will offer greater choice and competition for land and housing. Looking at the allocations for Cheadle, there are a number of sites which have been allocated for housing in and around the settlement offering flexibility and range. Respondent urge the Council to take this approach with Biddulph to promote choice and competition. This would provide small, local housebuilders with the opportunity to develop sites within the Borough, in line with paragraph 50 of the NPPF which supports the delivery of a wide choice of high quality homes, widening opportunities for home ownership and creating sustainable

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inclusive and mixed communities. Providing allocating a range of smaller sites, the Council would be delivering the range and flexibility suggested in the NPPF.

Council Response

A 20% buffer is applied to the five year supply calculation in order to address under delivery as required by the NPPF - not the overall development requirement.

The plan allocates four sites for housing / mixed-use development in Biddulph. In addition, windfall allowances for a further 160 homes are made in Policy SS4 which will further help to support a variety of development opportunities for the town.

Developer/Agent/Owner

- Respondent endorses the Council's intention to enhance the role of Biddulph as a significant service centre and a market town and support its regeneration. The Council suggest that this will be achieved through improving the local housing market by increasing the range available and identifying suitable land for housing sites within the urban area and on land adjacent to the urban areas. In order to support and enhance Biddulph's role as a service centre, respondent encourages the Council to distribute equal amounts of development to this settlement as is proposed for Leek and Cheadle. Respondent feels that to increase the housing options available and identify suitable land for housing, a number of smaller allocations should be provided as well as/instead of one large allocation.

Council Response

The Spatial Strategy seeks to preserve Green Belt as far as possible whilst supporting growth in Biddulph. The Spatial Strategy which apportions the housing and employment land requirements between the towns and rural areas, is set out in Pol SS3. The Spatial Strategy is predicated upon creating sustainable, self supporting communities as far as possible. The Leek requirements are retained from Policy SS3 in the adopted 2014 Core Strategy, which was found sound by Inspector. The Biddulph % requirement is lower than Leek, but Biddulph is a smaller town entirely constrained by surrounding Green Belt, as well as experiencing topographical issues. Cheadle, again a smaller town, has 25% requirement. Green Belt is a significant constraint for many of the Rural Areas villages as it can only be released in exceptional circumstances. Cheadle's housing share has risen from the 22% previously put forward in the Core Strategy to reflect the availability of suitable development sites outside the Green Belt.

Developer/Agent/Owner

Respondent endorses that all development will be assessed according to the extent to which it provides for high quality, sustainable housing and to which it meets identified housing needs, having regard to the location of the development, the characteristics of the site and the economics of provision. Having said that, respondent encourages the Council to reconsider the sites allocated in Policy H2.

Respondent supports the redevelopment of the sites within the town centre boundary, The Mills (BD101 and BD102) to provide 57 additional dwellings. This will make an important contribution to the regeneration of the town centre and boost the Council's housing supply in a sustainable location. However, respondent questions

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the Council allocating solely one large site as opposed to BD068 and BD087 and a number of smaller allocations. Deliverability is a key cause for concern with large allocations and given the under-delivery of housing over the past few years, respondents believe that allocating a number of smaller sites would assist the Council in delivering their housing requirement over the plan period.

Council Response

- *Support for the mills sites is noted.*
- *In addition to the mills, the Council has identified two further areas of the town for housing development - at Wharf Road and Tunstall Road.*
- *As this involves partial Green Belt release at Wharf Road and Green Belt release of the whole site at Tunstall Road, exceptional circumstances must be demonstrated.*
- *The Council considers that exceptional circumstances for releasing the Green Belt land on the Wharf Road site are that it will assist with bringing forward a large strategic mixed use regeneration site which is well related to the town centre and its key services and facilities.*
- *The Council considers that exceptional circumstances for releasing the Green Belt land on the Tunstall Road site are that it is ideally located with good road links opposite Victoria Business Park and bringing it forward will have a positive impact on the local economy.*
- *Aside from meeting the housing needs of Biddulph (which could be argued for all Green Belt sites around the town), it is considered more challenging to identify the exceptional circumstances which justify the release of BD068 and BD087 from the Green Belt.*
- *Any other smaller allocations would also need to be in the Green Belt around Biddulph (due to lack of alternatives) and provided they were considered suitable for release from the Green Belt in the Council's Green Belt Review they would also need to explain their exceptional circumstances.*
- *It is considered that the Wharf Road Strategic Development Site is deliverable over the plan period.*

Developer/Agent/Owner

- The Council have allocated one large site at Wharf Road to deliver 588 of the 725 dwellings from allocations. This policy states that development will be subject to: comprehensive master planning, mitigation of heritage impacts, positioning of housing to prevent noise and air quality issues, a flood risk assessment, deculverting a watercourse, the investigation of possible historic landfill, ecology reports etc. Without this suite of information presented at the outset, respondents question if this site will be suitable to accommodate residential development, if it is capable of delivering 588 dwellings and finally, if this number of dwellings is deliverable over the plan period? Respondent urges the Council to provide clear justification as to why this site has been chosen in place of other sites and also, allocate other smaller sites in and around the Borough to boost the delivery of housing.

Council Response

- *The vast majority of this site (between the bypass and the Biddulph Valley Way) is not in the Green Belt and the principle of development has already been established in the Council's adopted Core Strategy.*

Biddulph

BD087 Land off Beaumont Close

- *The Council's Green Belt Review concludes that the part of the site on the west side of the Biddulph Valley Way could be considered for release from the Green Belt provided that exceptional circumstances can be demonstrated. The exceptional circumstances relating to this site are that it will assist with bringing forward a large strategic mixed use regeneration site which is well related to the town centre and its key services and facilities. The Council has fully explored options for meeting its development needs without using Green Belt land. Biddulph is unique in that it is the only town in the Staffordshire Moorlands which is surrounded by Green Belt. This was taken into account at the time the Core Strategy was produced when Biddulph's housing proportion was less than the other towns at 20% of the total District housing figure to 2031. This proportion has been carried through into the Local Plan. Following recent consultation and evidence, the Council has reduced the amount of Green Belt land identified for development in Biddulph but there is not enough non-green belt land to meet all of the town's future development requirements.*

Public Response

None received

Local Plan Publication (Submission Version February 2018)

Site suggested for residential development.

Council Response

Sites BD068 and BD087 were included as an option in the 2015 'Site Options' consultation and in the 2016 'Preferred Option Sites and Boundaries' consultation. However, following the emergence of an alternative more preferable site, these sites were removed from the plan in 2017. Also, in their response to the Submission Version Local Plan, United Utilities (whose water treatment works is immediately adjacent to BD068) states that "United Utilities wishes to reiterate its preference for sensitive uses such as residential to be located away from our existing operational infrastructure. This is particularly relevant to our wastewater treatment works which are key operational infrastructure." (LPS391)

The Core Strategy Inspector states that sites in the Green Belt at Gillow Heath 'could' form the basis for small urban extensions. He also states that "it would clearly be premature and therefore inappropriate to give detailed consideration to those sites at this stage".

The Council's Core Strategy acknowledges that some Green Belt release is necessary to enable sufficient housing growth in Biddulph. This document already allocates the part of the site not within the Green Belt as a broad location for housing. BDNEW is an expansion of this existing allocation. The Submission Version Local Plan seeks to deliver Biddulph's housing requirement whilst ensuring that Green Belt release is kept to a minimum. Approximately, 255 homes are now planned in land currently designated as Green Belt in Biddulph (part of Wharf Road and Tunstall Road sites) compared to 480 in the 2016 consultation. This has been achieved by amendments to the proposed allocations with consideration given to their respective planning merits. Considering these factors collectively, it is considered that there are exceptional circumstances to release these sites from the Green Belt.

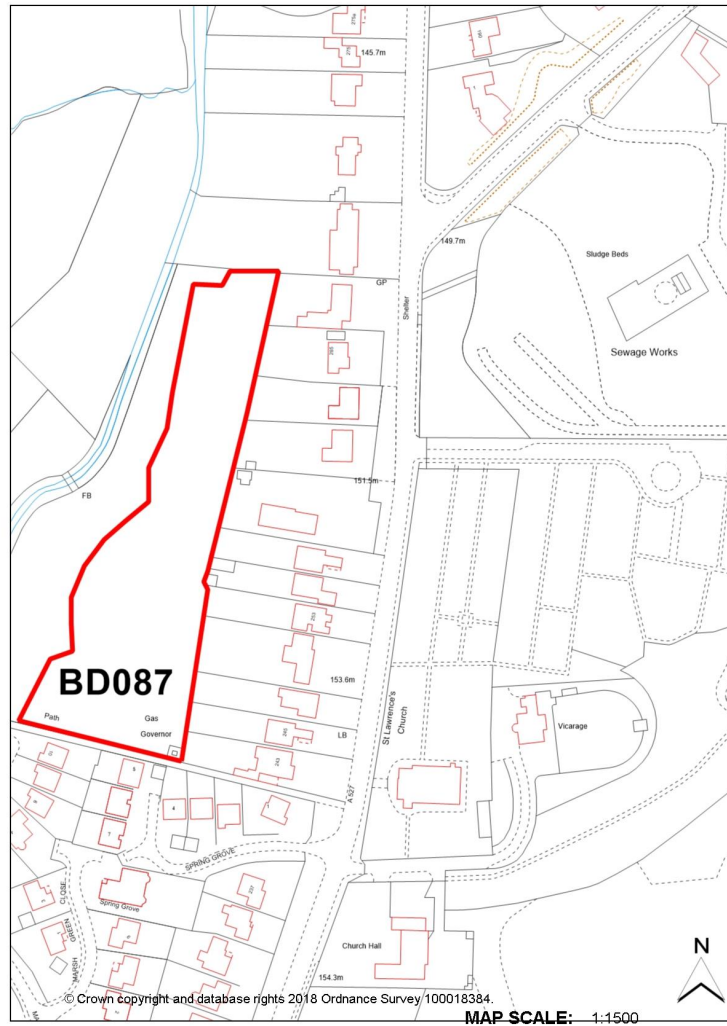
Biddulph

BD087 Land off Beaumont Close

BD068, BD087 and BDNEW have all been assessed as being suitable for release from the Green Belt subject to demonstration of exceptional circumstances in the Council's Green Belt Review. In determining which sites should be included in the Local Plan, the Council must balance relevant evidence, Government planning policy and public opinion.

Biddulph

BD087 Land off Beaumont Close



Picture 10.8

BD118 / BD109 - (Objection to exclusion of site made at Submission Stage)

Biddulph

BD118 & BD109 Brook Street Works and Land to East

Local Plan Process

- Site from the SHLAA
- Included in the options consultation July 2015
- Not included in the Preferred Options consultation April 2016
- Not included in Preferred Options Local Plan July 2017
- Not included in Submission Version Local Plan (February 2018)

Key Issues

- Green Belt site – not recommended for release in the Council's Green Belt Review.
- Low density proposed by agent.

Site Information

Greenfield/ brownfield	Built up area boundary/ countryside	Est. housing capacity	Area (ha)	Density per hectare	Ownership status	Site details
Greenfield/ Brownfield	Outside the settlement boundary in the Green Belt	12 (according to agent)	0.955	12dph	2 owners - Land available for developmen t	<ul style="list-style-type: none"> • Land used for commercial, equestrian and horticultural purposes. • Site would be accessed via Tower Hill Road. • Recent planning refusal for 10 detached dwellings (SMD/2017/0766) main reason for refusal was inappropriate development in Green Belt.

Studies

Agent acting on behalf of landowner has submitted:

- Indicative Landscape Proposal
- Landscape & Visual Impact Assessment
- Technical Transport Note

Biddulph

BD118 & BD109 Brook Street Works and Land to East

Landscape & Settlement Character Assessment 2008

Not within important landscape setting to settlement.

Green Belt Review 2015

(Sites BD109, BD118 and BD144 were assessed together)

Check sprawl: Contribution

Maintain Separation: Contribution

Prevent Encroachment: Significant Contribution

Preserve Setting: Contribution

Overall Impact: Moderate – Land to the west of Tower Hill Road presents a notably open aspect, with long distance views over open countryside to Mow Cop Castle, development on which would create a greater visual impact than the scale of this site suggests. Even the smaller option (BD109/BD118) is poorly contained physically and visually.

Recommendation: Not recommended for release.

Sustainability Appraisal

Sustainability Appraisal Submission Version June 2018

The proposed delivery of circa 26 dwellings is considered to have a significant positive effect. The site is also accessible to existing services, facilities and areas of existing employment as well as being located away from historic assets and a SSSI and LNR, as well as the site's low ecological value is likely to have a positive effect. However, the development of greenfield is assessed as having a negative effect.

The Council's Green Belt review has recommended that these sites are not released from the Green Belt. These sites were not taken forward as preferred options for consultation in April 2016.

Site Options Consultation July 2015

Statutory bodies/stakeholders:

SCC Highways - Likely to be acceptable subject to access design and visibility splays. May be appropriate to develop in tandem with BD144.

Developer/Agent/Owner – Land available. Owner has rights of access over current access point and an option to purchase it, land is in a suitable location and has a realistic prospect of delivery, would remove a non-conforming land use, would reduce the number of vehicle movements along the access road and improve safety, paddock and grassland adjacent to building is previously developed as a brick works though none of structures are present now, due to its quality it is not suitable for agricultural use, site does not have any special landscape qualities, is well related to the urban area and screened from the more open land to the west and north, landowner of BD109 fully supports a residential allocation and could be developed alongside site BD118 to provide an access onto Towerhill Road. Owner would be willing to bring site forward in conjunction with neighbouring BD144 (which is in separate ownership).

Biddulph

BD118 & BD109 Brook Street Works and Land to East

Public Response:

16 comments – 15 objections and 1 support

Issues raised:

Objections:

- Infrastructure - Schools - new school needed as schools are full.
- Infrastructure - Traffic / Transport - road network around site would need improving - Brook Street / Towerhill Road junction and Newpool Road / Towerhill Road junction as well as bridge on Newpool Road, existing congestion at the local surrounding schools during leaving and arrival times and the rush hour - queues at the traffic lights at Knypersley cross roads, speeding traffic a problem
- Infrastructure - Other - doctor's are full, public transport northwards finishes at 6pm. Current deficit in public open space and severe deficit in children's play areas.
- Landscape - unsightly and would block the view to Mow Cop
- Nature Conservation - detrimental impact on local wildlife
- Flood Risk - threat of flooding would increase - drains cannot currently cope
- Amenity (noise and dust associated with building work, privacy, loss of light) - negative impact on quality of life of existing residents
- Government Policy - Land is Green Belt and should be protected.
- Other - there are other alternatives - Suitable sites would be BD071 + BD071A + BD106 + BD156, these are better suited as the road can cope with volume of traffic as it lines the Bypass, use brownfield sites instead, Biddulph does not need more housing, need more business units to create jobs for existing residents, need for new houses / flats in town centres, existing empty properties in town centres.

Support:

- Scale of development - correct scale, would not impact on local area especially with properties adjacent and across the road.
- Other - Would benefit the area if developed for low cost housing, especially as they are to the west of Biddulph closer to employment areas.

Council Response:

- The District Council is working with the County Council on the issue of school capacity. The County has determined that additional school provision would be required to support housing growth at the Primary phase of education. At this early stage in the site selection process there are a number of options for delivering school capacity dependant on the sites selected to take forward.
- The Highway Authority considers that this development is acceptable subject to detailed design issues.
- New development is the main way to deliver new or improved infrastructure e.g. more residents may support an improved bus service and medical facilities. Infrastructure needs specifically related to a new development will be provided as part of that development e.g. children's play areas.

Biddulph

BD118 & BD109 Brook Street Works and Land to East

- The land in question is not highlighted as significant in the Council's Landscape & Settlement Setting Assessment.
- The Council has recently completed a Phase 1 Ecological Study for the District. This assessed sites included in the Site Options consultation. The site survey results will be used as part of the site selection process.
- The Council has recently completed a Level 1 Strategic Flood Risk Assessment for the District, the results of which are being used to inform the site selection process. Mitigation measures will be taken as part of the site development to address any surface water issues.
- Amenity – issues such as loss of light, noise and privacy as well as other impacts on existing residents will be assessed in detail once a site layout has been determined at the time a planning application is received and residents will have the opportunity to comment on the content of that application.
- The land in question is within the Green Belt. In order for Biddulph to accommodate new development, the Green Belt boundary will need adjustment as there are not enough sites in the existing settlement boundary to accommodate the level of development needed. The Council has recently completed a Green Belt Review in order to assess parts of the Green Belt where minor adjustments can be made without having an impact on the function of the Green Belt as a whole (as defined in government planning guidance). This study recommends that BD109 & BD118 are not released from the Green Belt.
- The SHLAA has assessed more than 150 sites in and around Biddulph including brown field sites and these have been included as allocations where they are suitable, available and deliverable. However, there is not enough brownfield land to meet the town's requirements so green field sites also need to be included. Sites BD071 and BD071a have been included as potential allocations.
- The new Local Plan will cover a period to 2031 so lack of demand (perceived or actual) at one point in time is not a valid reason for not meeting the area's objectively assessed housing needs.
- New employment land is proposed at the south of the town (BD117). New investment in the town would have knock-on positive effects for the town centre.
- Housing requirements in the Staffordshire Moorlands are in addition to existing properties even if these are for sale or derelict.

Local Plan Publication (Submission Version February 2018)

Site suggested as a residential site.

Council Response

Biddulph

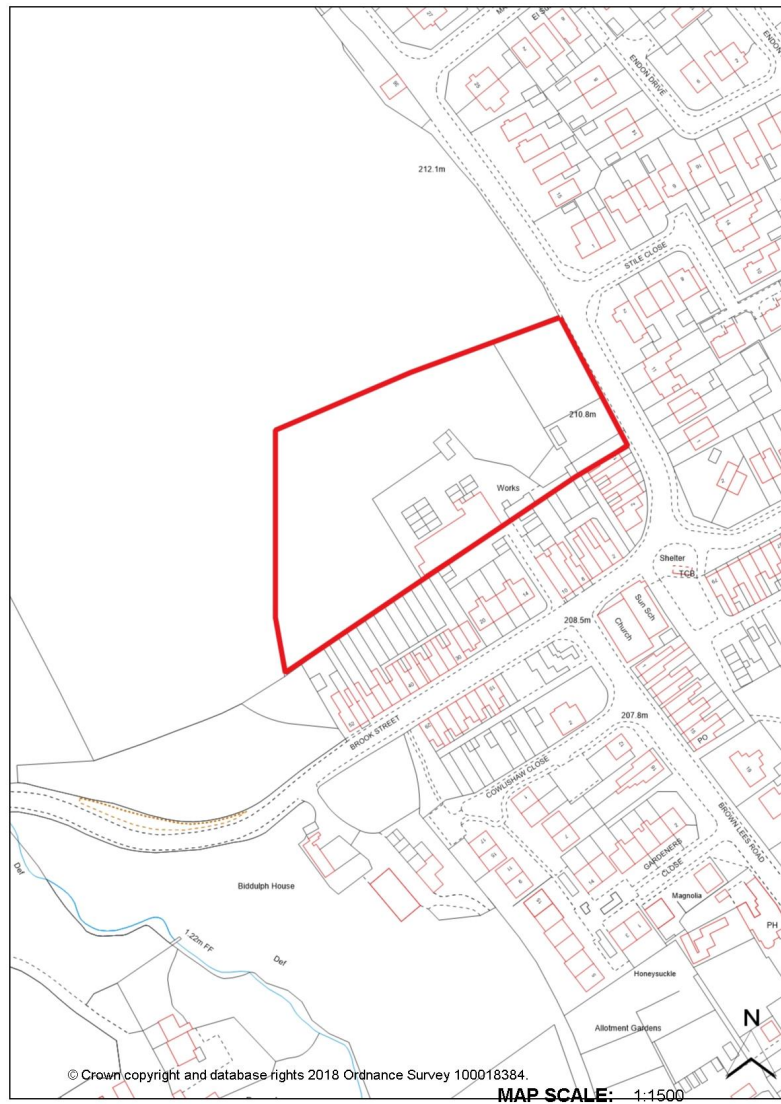
BD118 & BD109 Brook Street Works and Land to East

BD118, BD109 and BD144 were included in the Site Options Consultation Booklet published in July 2015. The wording in the booklet makes it clear that this list of sites potentially suitable for development formed the basis of public consultation and the inclusion of a site on the list at that stage did not imply the Council's support for that site as an allocation. It also stated that not all of the sites included would be needed and the list would be refined into preferred options following feedback from consultation.

None of these sites were included at the next stage (Preferred Sites and boundaries published in 2016) because the Council's Green Belt Review (published in November 2015) did not recommend them for release from the Green Belt due to them being poorly contained physically and visually and making a significant contribution to the Green Belt purpose of preventing encroachment.

Biddulph

BD118 & BD109 Brook Street Works and Land to East



Picture 10.9

BD138a / BD138b - (Objection to exclusion of site made at Submission Stage)

Biddulph

BD138a and BD138b Land at Gillow Heath

Local Plan Process

- Included in the options stage 2015
- Not included in the plan at any subsequent stages

Key Issues

- Green Belt Site – not recommended for release in Green Belt Review.

Site Information

Greenfield/ brownfield	Built up area boundary/ countryside	Est. housing capacity	Area (ha)	Density per hectare	Ownership status	Site details
Greenfield	Countryside Greenbelt	186 (combined)	5.1	30	Owner willing to develop	• Fields

Studies

Landscape & Settlement Character Assessment 2008

Important landscape setting to settlement.

Green Belt Review 2015

(Appraised sites according to their contribution to Green Belt Purposes)

Check Sprawl: Contribution

Maintain Separation: Limited contribution

Prevent Encroachment: Significant contribution

Preserve Setting: Contribution

Overall Impact on Green Belt Purposes: Moderate

Broadly rising land lying outside the current settlement envelope beyond Well Lane. Despite the intrusion of isolated built development, the land retains a clear, open countryside character, development of which would create visual intrusion and compromise openness, notwithstanding the boundaries provided by Wedgewood Lane / Marshfield Lane and an unmade track to Congleton Edge Road.

Recommendation: Not recommended for release

Sustainability Appraisal Submission Version June 2018

BD138a

The proposed delivery of circa 90 dwellings is considered to have a significant positive effect, as could the site's proximity to existing areas of employment. The site is also accessible to existing services and facilities is likely to have a positive effect, as could its low biodiversity value of the site. However, the development of greenfield land, grade 4 ALC is assessed as having a negative effect, as could the site's location near to historic assets.

Biddulph

BD138a and BD138b Land at Gillow Heath

The site lies within the area considered as important landscape setting to settlement. The Council's Green Belt review has recommended that this site is not released from the Green Belt. This site was not taken forward as a preferred option for consultation in April 2016.

BD138b

The proposed delivery of circa 76 dwellings is considered to have a significant positive effect, as could the site's proximity to existing areas of employment. The site is also accessible to existing services and facilities is likely to have a positive effect. However, the development of greenfield land, grade 4 ALC is assessed as having a negative effect, as could the site's location near to historic assets and the ecological value of the site.

The site lies within the area considered as important landscape setting to settlement. The Council's Green Belt review has recommended that this site is not released from the Green Belt. This site was not taken forward as a preferred option for consultation in April 2016.

Site Options Consultation July 2015

BD138a

Statutory bodies/stakeholders:

SCC Highways - Acceptable subject to access design, provision of adequate visibility and likely improvement of local roads and junctions. The square of land adjacent to number 80 Mow Lane is in separate ownership to the majority of this plot (from previous applications 12/01335 and 05/00409) In order to provide adequate visibility it is crucial that these plots are combined as BD138a and come forward to application together. Wedgwood Lane should be improved between plots 138a and 138b.

Natural England - Natural England consider this may represent a strategic site – Has a Landscape & Visual Impact Assessment been carried out? Those sites taken forward to the next stage of the process may require LVIA in order to inform the development specification for the site.

Developer/Agent/Owner - Support development of site, adjacent to urban area, available immediately, no legal constraints, interest from development industry, no costly ground conditions, no contamination, contribution to affordable housing and other local infrastructure needs, clear and defensible boundary to its western and northern edge, preliminary highway and transport report does not raise any issues, limited visual impact, Coal Mining and Brine Subsidence Claim report which does not raise any technical or ground objections to development taking place on the site, public footpath across site can be retained or re-provided as part of scheme, no known flood issue on or near to site, no known or significant ecological interests, well served by utilities.

Public Response

19 comments – all objections.

Biddulph

BD138a and BD138b Land at Gillow Heath

Issues raised:

- Infrastructure - Schools are at capacity.
- Infrastructure - Traffic / Transport - Mow Lane and Well Lane are both small country roads which are narrow and struggle with the amount of traffic already at times, roads impassable in wintry weather, no pavements beyond Wedgwood Lane junction and little street lighting, poor junction with Congleton Road - already dangerous - highway network would need upgrading.
- Infrastructure - Other - limited, sewage works would have to be enlarged, public transport northwards finishes at 6pm. Current deficit in public open space and severe deficit in children's play areas.
- Landscape - Development will alter the special historic landscape this area is valued for. This site is beyond the defensible boundary of the town and forms part of the open countryside.
- Nature Conservation - loss of hedgerows, impact on wildlife - foxes, badgers, bats, buzzards, barn owls.
- Flood Risk - Mow Lane suffers from flooding, surface water will find its way into sewerage system which cannot cope at present due to design / construction of town sewer causing flooding in Gillow Heath - United Utilities say this cannot be solved without considerable funds.
- Amenity (e.g. noise, privacy, loss of light) - will spoil area's natural beauty and character, loss of resource for local residents and views, under the Human Rights Act, in particular Protocol 1, Article 1. - states that a person has the right to peaceful enjoyment of all their possessions, which includes the home and other land.
- Scale of development - too much development proposed in Gillow Heath area.
- Government Policy - Green Belt land should be protected. Also not in line with Core Strategy para. 7.56 and Policies SO9 and C1.
- Other - BD071, BD071a could cope better with the traffic and increased population, also use other non-greenbelt sites and brownfield sites first e.g. four mills, the Forge colour works, two redundant garden nursery sites, need for new houses / flats in town centres, existing empty properties in town centres, loss of public footpath, historic mining on site, town centre is declining, no more jobs being created, new residents will commute creating a dormitory town, figures for population growth are national not local - houses at Uplands mill not selling, query value of land for agriculture. Consultation form is too complicated, requirement to complete a separate form for each site too onerous.

Council Response

- The District Council is working with the County Council on the issue of school capacity. The County has determined that additional school provision would be required to support

Biddulph

BD138a and BD138b Land at Gillow Heath

housing growth at the Primary phase of education. At this early stage in the site selection process there are a number of options for delivering school capacity dependant on the sites selected to take forward.

- The Highway Authority has no difficulties in principle with this development provided that appropriate highway standards can be achieved. Cumulative development in this area would need to be assessed through a TA.
- New development is the main way to deliver new or improved infrastructure e.g. more residents may support an improved bus service and medical facilities. Infrastructure needs specifically related to a new development will be provided as part of that development e.g. children's play areas.
- The land in question is highlighted as significant in the Council's Landscape & Settlement Setting Assessment. A Landscape & Visual Impact Assessment would need to be undertaken if this site progresses.
- The Council has recently completed a Phase 1 Ecological Study for the District. This assessed sites included in the Site Options consultation. The site survey results will be used as part of the site selection process.
- The Council has recently completed a Level 1 Strategic Flood Risk Assessment for the District, the results of which are being used to inform the site selection process. Mitigation measures will be taken as part of the site development to address any surface water issues.
- United Utilities has advised that if appropriate measures for surface water disposal are included within development schemes then there should be no detrimental impact on the capacity of their infrastructure.
- Amenity – issues such as overlooking and loss of light as well as other impacts on existing residents such as house types and densities will be assessed in detail once a site layout has been determined at the time a planning application is received and residents will have the opportunity to comment on the content of that application.
- The Council has carefully considered the case of Britton and has concluded that the site selection process does not contravene Article 8 (as it now is) of the Human Rights Act 1998. The local plan process which is being followed is in accordance with the law and is not one which determines or directly affects an arguable civil right (see the case of Bovis Homes Ltd v New Forest District Council [2002] EWHC 483). The grant or refusal of planning permission would qualify (as in the Britton case) because it has direct consequences for a landowner. The local plan process is subject to a statutory process which allows for objections to be made and considered before adoption takes place. Once adopted it does not of itself determine property rights, even though it might be highly influential on the outcome of a planning application, because there always remains a discretion to the decision-maker. A local plan once adopted does not affect the current use or enjoyment of land; nor the right to seek planning permission; nor ownership rights.

Biddulph

BD138a and BD138b Land at Gillow Heath

- It is not considered that development of this particular site would be out of proportion with its surroundings and it is very unlikely that all the sites put forward in the consultation within this area will be selected as preferred options. Any new development taking place will be subject to design policies contained within the new Local Plan – which will be subject to public consultation next year.
- The land in question is within the Green Belt. In order for Biddulph to accommodate new development, the Green Belt boundary will need adjustment as there are not enough sites in the existing settlement boundary to accommodate the level of development needed. The Council has recently completed a Green Belt Review in order to assess parts of the Green Belt where minor adjustments can be made without having an impact on the function of the Green Belt as a whole (as defined in government planning guidance). This study does not recommend releasing BD138a nor neighbouring sites (BD064 and BD138b) from the Green Belt.
- The SHLAA has assessed more than 150 sites in and around Biddulph including brown field sites and these have been included as allocations where they are suitable, available and deliverable. However, there is not enough brownfield land to meet the town's requirements so green field sites also need to be included. Prioritising brown field land is no longer part of Government policy.
- Housing requirements in the Staffordshire Moorlands are in addition to existing properties even if these are for sale or derelict.
- Public footpaths can be retained in situ or re-directed as part of new development.
- The Council is aware of mining issues which affect a number of green field sites around Biddulph and investigative work will take place in these areas prior to the commencement of any development.
- New investment in the town would have knock-on positive effects for the town centre. New employment land is proposed at the south of the town (BD117).
- National population figures are the starting point for assessing an area's objectively assessed housing needs – this is standard practice. The new Local Plan will cover a period to 2031 so lack of demand (perceived or actual) at one point in time is not a valid reason for not meeting the area's objectively assessed housing needs.
- The agricultural land classification of the site is grade 4 which means that it is poor quality.

BD138b

Statutory bodies/stakeholders:

SCC Highways - Acceptable subject to adequate visibility and access design. May require improvement of local roads. Wedgwood Lane should be improved between plots 138a and 138b.

Biddulph

BD138a and BD138b Land at Gillow Heath

Developer/Agent/Owner - Support development of site, adjacent to urban area, available immediately, no legal constraints, interest from development industry, no costly ground conditions, no contamination, contribution to affordable housing and other local infrastructure needs, clear and defensible boundary to its western and northern edge, preliminary highway and transport report does not raise any issues, limited visual impact, Coal Mining and Brine Subsidence Claim report which does not raise any technical or ground objections to development taking place on the site, public footpath across site can be retained or re-provided as part of scheme, no known flood issue on or near to site, no known or significant ecological interests, well served by utilities.

Public response

30 comments – all objections.

Issues raised:

- Infrastructure - Schools and nurseries at capacity in the area.
- Infrastructure - Traffic / Transport - Site access is problematic, Well Lane and Mow Lane are small country roads which could not cope with extra housing and construction traffic, dangerous in wintry conditions, Marsh Green Road / Congleton Road is a poor junction, safety due to lack of footpaths.
- Infrastructure - Limited infrastructure in the area - e.g. no shop or takeaway, query capacity of sewage works, capacity of doctors, public transport northwards finishes at 6pm. Current deficit in public open space and severe deficit in children's play areas.
- Landscape - listed in Council's Landscape & Settlement Setting document as important to setting of settlement. This site is beyond the defensible boundary of the town and forms part of the open countryside.
- Nature Conservation - impact on wildlife e.g. foxes, owls, woodpeckers, jays, bullfinches, foxes, badgers, rabbits, loss of hedgerows - need wildlife survey.
- Flood Risk - there is an underground watercourse running through the site, Mow Lane floods in heavy rain, surface water will find its way into sewerage system which cannot cope at present due to design / construction of town sewer causing flooding in Gillow Heath - United Utilities say this cannot be solved without considerable funds.
- Amenity (e.g. noise, privacy, loss of light) - object to more traffic, noise and pollution, loss of rural character of this part of town, loss of visual amenity, loss of privacy as proposed housing is higher than existing, smells from sewage works. Under the Human Rights Act, in particular Protocol 1, Article 1. - states that a person has the right to peaceful enjoyment of all their possessions, which includes the home and other land.
- Scale of development - too much development proposed for Gillow Heath, out of proportion.

Biddulph

BD138a and BD138b Land at Gillow Heath

- Government Policy - Green Belt land should be protected. Also not in line with Core Strategy para. 7.56 and Policies SO9 and C1.
- Other - BD071, BD071a could cope better with the traffic and increased population, use brownfield sites instead, detrimental impact on tourism - site is clearly visible from Biddulph Grange, site would be next to an area of 4.5 acres of solar panels (if approved), lack of jobs in Biddulph, shops closing, new residents will commute creating a dormitory town, need for new houses / flats in town centres, existing empty properties in town centres, figures for population growth are national not local - houses at Uplands mill not selling, consultation form is too complicated, requirement to complete a separate form for each site too onerous.

Council Response

- The District Council is working with the County Council on the issue of school capacity. The County has determined that additional school provision would be required to support housing growth at the Primary phase of education. At this early stage in the site selection process there are a number of options for delivering school capacity dependant on the sites selected to take forward.
- The Highway Authority has no difficulties in principle with this development provided that appropriate highway standards can be achieved. Cumulative development in this area would need to be assessed through a TA.
- New development is the main way to deliver new or improved infrastructure e.g. more residents may support an improved bus service and medical facilities. Infrastructure needs specifically related to a new development will be provided as part of that development e.g. children's play areas.
- The land in question is highlighted as significant in the Council's Landscape & Settlement Setting Assessment. A Landscape & Visual Impact Assessment would need to be undertaken if this site progresses.
- The Council has recently completed a Phase 1 Ecological Study for the District. This assessed sites included in the Site Options consultation. The site survey results will be used as part of the site selection process.
- The Council has recently completed a Level 1 Strategic Flood Risk Assessment for the District, the results of which are being used to inform the site selection process. Mitigation measures will be taken as part of the site development to address any surface water issues.
- United Utilities has advised that if appropriate measures for surface water disposal are included within development schemes then there should be no detrimental impact on the capacity of their infrastructure.
- Amenity – issues such as overlooking and loss of light as well as other impacts on existing residents such as house types and densities will be assessed in detail once a

Biddulph

BD138a and BD138b Land at Gillow Heath

site layout has been determined at the time a planning application is received and residents will have the opportunity to comment on the content of that application.

- The Council has carefully considered the case of Britton and has concluded that the site selection process does not contravene Article 8 (as it now is) of the Human Rights Act 1998. The local plan process which is being followed is in accordance with the law and is not one which determines or directly affects an arguable civil right (see the case of Bovis Homes Ltd v New Forest District Council [2002] EWHC 483). The grant or refusal of planning permission would qualify (as in the Britton case) because it has direct consequences for a landowner. The local plan process is subject to a statutory process which allows for objections to be made and considered before adoption takes place. Once adopted it does not of itself determine property rights, even though it might be highly influential on the outcome of a planning application, because there always remains a discretion to the decision-maker. A local plan once adopted does not affect the current use or enjoyment of land; nor the right to seek planning permission; nor ownership rights.
- It is not considered that development of this particular site would be out of proportion with its surroundings and it is very unlikely that all the sites put forward in the consultation within this area will be selected as preferred options. Any new development taking place will be subject to design policies contained within the new Local Plan – which will be subject to public consultation next year.
- The land in question is within the Green Belt. In order for Biddulph to accommodate new development, the Green Belt boundary will need adjustment as there are not enough sites in the existing settlement boundary to accommodate the level of development needed. The Council has recently completed a Green Belt Review in order to assess parts of the Green Belt where minor adjustments can be made without having an impact on the function of the Green Belt as a whole (as defined in government planning guidance). This study does not recommend releasing BD138b nor neighbouring sites (BD064 and BD138a) from the Green Belt.
- The SHLAA has assessed more than 150 sites in and around Biddulph including brown field sites and these have been included as allocations where they are suitable, available and deliverable. However, there is not enough brownfield land to meet the town's requirements so green field sites also need to be included. Prioritising brown field land is no longer part of Government policy.
- Housing requirements in the Staffordshire Moorlands are in addition to existing properties even if these are for sale or derelict.
- Public footpaths can be retained in situ or re-directed as part of new development.
- The Council is aware of mining issues which affect a number of green field sites around Biddulph and investigative work will take place in these areas prior to the commencement of any development.
- New investment in the town would have knock-on positive effects for the town centre. New employment land is proposed at the south of the town (BD117).

Biddulph

BD138a and BD138b Land at Gillow Heath

- National population figures are the starting point for assessing an area's objectively assessed housing needs – this is standard practice. The new Local Plan will cover a period to 2031 so lack of demand (perceived or actual) at one point in time is not a valid reason for not meeting the area's objectively assessed housing needs.
- The agricultural land classification of this site is grade 4 which means that it is poor quality.

Submission Version February 2018

Sites suggested for residential development.

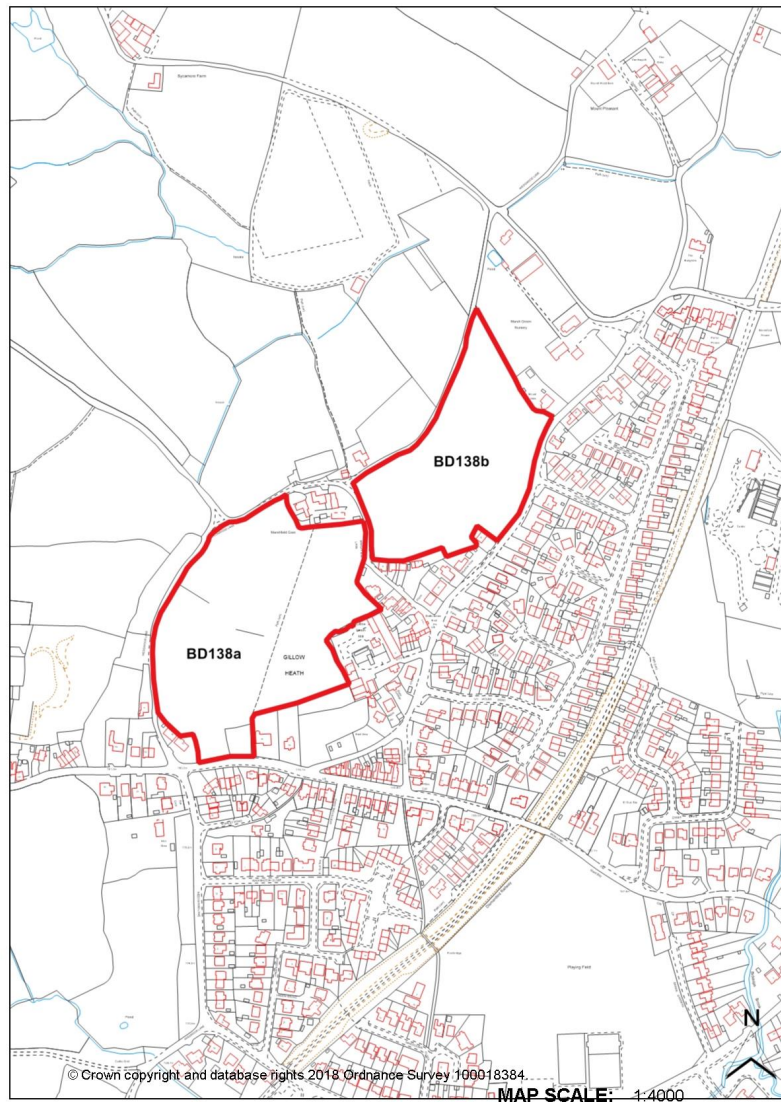
Council Response

BD138a and BD138b were included in the Site Options Consultation Booklet published in July 2015. The wording in the booklet makes it clear that this list of sites potentially suitable for development formed the basis of public consultation and the inclusion of a site on the list at that stage did not imply the Council's support for that site as an allocation. It also stated that not all of the sites included would be needed and the list would be refined into preferred options following feedback from consultation.

These sites were not included at the next stage, ('Preferred Sites and Boundaries' published in 2016) because the Council's Green Belt Review (published in November 2015) did not recommend the sites for release from the Green Belt due to visual intrusion and the openness of the Green Belt being compromised.

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BD138a and BD138b Land at Gillow Heath



Picture 10.10

Gypsy and Travellers Assessments



11 Gypsy and Travellers Assessments

Staffordshire Moorlands Local Plan Topic Paper - Site Allocations Biddulph

DATE/COOP SITE ADDRESS	GRID REF.	Site identification (10) planning (12)	Site area	Safe and convenient vehicular and pedestrian access to the site	This site must be large enough to provide for parking, 100 car spaces and residential amenity	The site is reasonably accessible to shops, schools, public transport facilities on foot, by cycle or public transport	The site should not be detrimental to amenities of adjacent occupiers	Adequate levels of privacy and residential amenity for occupiers	Sites of features of natural, historic or archaeological value should not be harmed	Green Belt commentary	Visual amenity	Accessibility	Stability	RELEVANT CLASSIFICATION	Other comments	
T1027 Land/04418 Meadows Special Transit Road By STB 7AB	29 07 03 510804	0.2	0.2	Meadows School onto A27 which is 7m wide two way carriageway. A27 gains an exit back around 25m from road. Continue 25m from road. Continue past the public house and on to the south wing (S27) to a field of about 120m x 100m. Road access is to the north of the site. SCC Highways state that in "meadows to use as a road site" (Agres 1) satisfactory.	Site is within residential (1) zone which is a large enough site to accommodate a large house with 2-3 bedrooms. The site is also large enough to accommodate a garage and a driveway. The site is also large enough to accommodate a garden and a lawn. The site is also large enough to accommodate a driveway and a garage. The site is also large enough to accommodate a garden and a lawn. The site is also large enough to accommodate a driveway and a garage.	The site is reasonably accessible to shops, schools, public transport facilities on foot, by cycle or public transport.	The site should not be detrimental to amenities of adjacent occupiers.	Adequate levels of privacy and residential amenity for occupiers.	Sites of features of natural, historic or archaeological value should not be harmed.	Site is Green Belt.	Site is Green Belt.	Site is Green Belt.	Site is Green Belt.	Site is Green Belt.	Site is Green Belt.	Sites of features of natural, historic or archaeological value should not be harmed.