

MATTER 8

Biddulph Allocations

Issue 1 – Identification of Sites

1.1 Is the approach within the Strategic Housing Land Availability Assessment (SHLAA) to assessing the suitability and screening of sites in Biddulph robust?

1.1.1 Yes, it is.

1.1.2 The approach is the same for all settlements in the Local Plan and provides a robust analysis of potential sites for residential development in the District. The SHLAA (ED 26.1) identified and assessed the availability, suitability and deliverability of land as potential housing sites and sets out a clear methodology. Appendix A and B provides a summary of the large and small site assessments and detailed assessment forms for the larger sites (ED 26.2 & 26.3).

1.2 Do the Green Belt assessments support the allocations in Biddulph?

1.2.1 Yes, they do.

1.2.2 The Green Belt Review Study 2015 (ED22.4) with the accompanying additional site update (ED22.7) assessed the sites at Tunstall Road and to the west of Biddulph Valley Way against the purposes of the Green Belt and concluded both sites were suitable to be considered for release from the Green Belt if there were exceptional circumstances. Regarding land to the west of the Biddulph Valley Way, the study identified the south western boundary as an area where a new settlement edge would have to be created to prevent sprawl into the open countryside over the longer term and this has been reflected in Policy DSB1 (ED22.7 page 5).

1.2.3 The exceptional circumstances for this Green Belt Release have been included in the supporting text to policies DSB1 and DSB3 as Main Modifications in response to the Inspector's preliminary questions (MM42 and MM45).

1.3 Does the LP provide for a range of sites of different sizes in Biddulph?

1.3.1 Yes it does.

1.3.2 Policy H2 shows that a range of site sizes are being proposed as allocations for Biddulph – a large site of 588 dwellings and a couple of medium/small sites of 57 and 85 dwellings as well as an allowance for small windfall sites in Policy SS4.

1.4 What is the up to date position in relation to planning permissions affecting the proposed allocations?

1.4.1 There are no current planning permissions or applications affecting the proposed allocations at the time of writing.

Issue 2 – Wharf Road Strategic Development Area (SDA) (DSB1)

2.1 Have exceptional circumstances been demonstrated to justify the removal of land from the Green Belt to the west of Biddulph Valley Way (BVW)?

2.1.1 Yes they have.

2.1.2 The Council has proposed a main modification in response to the Inspector's preliminary questions to add additional wording to the supporting text to the policy to justify the exceptional circumstances (MM42).

2.2 If exceptional circumstances have been demonstrated have these been clearly articulated in the LP?

2.2.1 Yes they have. Refer to the response to Question 2.1 (above).

2.3 In what ways would the release of land to the west of BVW assist in bringing forward the Wharf Road SDA?

2.3.1 The larger part of the site (between the bypass and the BVW) is an existing allocation in the Council's Core Strategy which has not yet come forward for development. The addition of an adjacent site with fewer constraints will increase the critical mass and potentially be more attractive to the development industry than a series of smaller sites spread around the town.

2.3.2 This area of land alongside the wider Wharf Road site is in a highly sustainable location close to the town centre and this is reflected in the Sustainability Appraisal assessment for the site (ED6.5 p.1798).

2.4 Is the Council satisfied that the landscape, heritage, mining legacy, biodiversity, access, transport and flood risk constraints are capable of being mitigated so that development of the site would be acceptable?

2.4.1 Yes.

Landscape

2.4.2 The site lies on the western edge of Biddulph. As is the case with all proposed Local Plan allocations a site specific Landscape Impact Study (ED22.5 p.49 – 50 and ED22.8 p.3-4) has been undertaken which identifies parts of the site where landscape sensitivity is low, medium and high and suggests specific mitigation measures which have been incorporated into Policy DSB1 (MM43). The Green Belt Review (ED22.7 p.5) also suggests a landscape mitigation measure relating to the parcel of land on the west side of the Biddulph Valley Way which has also been incorporated into the site policy.

Heritage

2.4.3 A Heritage Impact Study has been undertaken (ED22.5 p.87-88 and ED22.8 p.4-5). There are a cluster of heritage assets within and immediately adjacent to the south eastern boundary. The study concludes that the site is suitable for development in heritage terms subject to appropriate masterplanning. The Council's Conservation Officer has made site specific recommendations which

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have been incorporated into the policy (ED13.2 p.147). Historic England have also commented on heritage implications (ED5.3 – Appendix 1 p.276 & ED1.3 p.4498, 4506) throughout the site selection process and the Council has met with them to agree the appropriate mitigation measures the developer will need to undertake. They have requested that the developer undertakes an assessment of how the setting of the Listed Buildings contributes to their significance to inform the site layout. These measures have been included within the site policy (DSB1).

Mining legacy

- 2.4.4 The Council consulted with the Coal Authority regarding the mining legacy of the site at an early stage in the site selection process (ED13.2 p.82-83, 100). They advised that the site should not be considered undeliverable due to its mining legacy and that the mine entries are merely a constraint which may affect overall capacity. They suggest that mine entries could be located within non-built areas such as open space, roads etc. so they can be appropriately integrated into the site layout. They also point out that they have seen successful residential schemes come to fruition with more mining legacy features than this site. The Coal Authority's comments are reflected in the supporting text to Policy DSB1.

Biodiversity

- 2.4.5 Ecological survey work has taken place on each part of the site in the form of an extended Phase 1 Habitat Survey and a Local Wildlife Assessment and Policy NE1 requires them to be taken into account in development schemes (MM34). The outcome of these reveals that there is ecological interest on the site – though nothing that makes it undevelopable. Recommendations given for further survey work on parts of the site will need to be undertaken by the developer to determine mitigation measures and inform site layout. Similarly, linear habitat connectivity to the nearby Biodiversity Alert site (to the north of the site and mentioned in the policy) could be maintained and possibly enhanced as part of Green Infrastructure considerations for the site (MM43).

Transport & Access

- 2.4.6 County Highways have been consulted throughout the plan preparation process and have stated that development of the site would be acceptable in principle subject to access design and Transport Assessment. (ED13.2 p.83). In relation to access points, their requirements regarding using Tunstall Road rather than the bypass as an access point to land on the east side of the bypass have been included in Policy DSB1 (ED13.2 p.104). They consider that crossing the Biddulph Valley Way in a central position to be acceptable in principle (ED13.2 p.164). It is intended that further consideration of actual access points will take place as part of the master planning process.

Flood risk

- 2.4.7 The whole site is within Flood Zone 1 (i.e. low probability of flooding). There is a watercourse running through the middle of the site requiring preservation (appropriate wording to address this has been included in Policy DSB1). The Lead Local Flood Authority has requested a Flood Risk Assessment of the whole site. Other technical matters relate to drainage for foul and surface water and the presence of large public sewers on the site which cannot be built over. Consultation with

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statutory bodies (Environment Agency, Lead Local Flood Authority, United Utilities) has taken place throughout the plan preparation process (ED13.2 p.91) and the supporting text in Policy DSB1 reflects their wishes. All of these issues can be addressed in the site layout and through the policy measures in SD5.

2.5 What are the implications of providing access across the BVW for its value as a sustainable transport route?

2.5.1 Staffordshire County Council (the Highway Authority) consider a vehicular access across the BVW to be acceptable in principle. The County's Rights of Way Team has no issue with this provided the route remains open and unrestricted (ED13.2 – p.164).

2.5.2 A vehicular route across the BVW would not set a precedent as this already occurs in three places further north at Halls Road, Mow Lane and Marsh Green Road.

2.5.3 The site policy contains wording to ensure the safety of users of the BVW.

2.6 Are the density assumptions realistic taking into account market signals?

2.6.1 Yes, they are.

2.6.2 The supporting text to Policy DSB1 in the Submission Version Local Plan (paragraph 9.35) explains that the density levels vary across the site with the highest level assumed for the area between the bypass and Tunstall Road and lower levels for the most constrained parts of the site. It is not considered that the density levels are excessively high – land to the west of the bypass has been assumed to have either 29dph or 35dph density. When calculating density levels on this site the Council needs to consider making best use of the land to minimise incursions into the Green Belt.

2.6.3 The Viability Study (ED 24.1 – p.109, 110, Appendix D) has tested the viability of the site taking into account the site constraints at a density of 35.7dph / capacity of 588 dwellings and concluded that it is viable.

2.7 Are all the policy requirements necessary and clear to the decision maker?

2.7.1 Yes, they are.

2.7.2 All the policy requirements have been included to reflect the evidence base or consultation comments from statutory bodies and are considered to be relevant site specific matters which need to be taken into account in determining a planning application. They provide a useful reference for developers, the master planning process and the local community.

2.7.3 The Council has responded to the Inspector's preliminary questions in relation to the content of the policy and main modifications have been proposed to delete references to generic requirements which are covered by other plan policies (MM36).

2.8 Is the site deliverable taking into account the multiple ownerships involved and constraints such as the mining legacy?

2.8.1 Yes it is.

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- 2.8.2 The Viability Study considers the site to be viable taking into account the site constraints (refer to paragraph 2.6.3 and the response to question 2.4 relating to mitigation of constraints).
- 2.8.3 The Council intends to be proactive in delivering this site and its accelerated housing delivery programme is underway (ED33.6). The Council has recently held meetings with key landowners and appointed consultants to undertake a masterplan for the site. This process is expected to take 6 months to complete. Key outputs will include:
- a baseline report with relevant on-site investigations including a topographical survey,
 - presentation of a number of layout options to include costings, end value and viability of each,
 - Preparation of a summary report outlining initial options and how the final preferred option has been reached,
 - Preparation of a detailed masterplan including preferred option and layouts,
 - Involvement of landowners and wider consultation,
 - Costings – development costs and end values for each option,
 - Viability advice and preferred option, estimate on outputs,
 - Delivery mechanism plan to include: Options for land assembly; Phasing of delivery; Funding opportunities and Investment potential.

Issue 3 – Biddulph Mills (DSB2)

3.1 Are all the policy requirements necessary and clear to the decision maker?

- 3.1.1 Yes, they are.
- 3.1.2 The policy requirements have been included to reflect the evidence base and are considered to be relevant site specific matters which need to be taken into account in determining a planning application. They provide a useful reference for developers and the local community.
- 3.1.3 The Council has responded to the Inspector's preliminary questions in relation to the content of the policy and main modifications have been proposed to delete references to generic requirements which are covered by other plan policies (MM36).

Issue 4 – Tunstall Road (SDA) (DSB3)

4.1 Have exceptional circumstances been demonstrated to justify the removal of land from the Green Belt?

- 4.1.1 Yes they have.
- 4.1.2 The Council has proposed a main modification in response to the Inspector's preliminary questions to add additional wording to the supporting text to the policy to justify the exceptional circumstances (MM45).

4.2 If exceptional circumstances have been demonstrated have these been clearly articulated in the LP?

- 4.2.1 Yes they have. Refer to the response to Question 4.1 (above).

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4.3 Are all the policy requirements necessary and clear to the decision maker?

4.3.1 Yes, they are.

4.3.2 All the policy requirements have been included to reflect the evidence base and are considered to be relevant site specific matters which need to be taken into account in determining a planning application. They provide a useful reference for developers, the master planning process and the local community.

4.3.3 The Council has responded to the Inspector's preliminary questions in relation to the content of the policy and main modifications have been proposed to delete references to generic requirements which are covered by other plan policies (MM36).

4.4 Is the site deliverable taking into account the multiple ownerships involved?

4.4.1 Yes it is.

4.4.2 The Viability Study considers the site to be viable taking into account the site constraints (ED 24.1 – p.109, 110, Appendix D).

4.4.3 The content of paragraph 2.8.3 outlining the Council's proactive approach to delivery also applies to this site. The Council has recently held meetings with all landowners and the masterplanning process is underway with the same outputs and timescales as the one for Wharf Road.

4.5 Should the extent of the allocation be amended as part of it is controlled by an unwilling landowner?

4.5.1 The Council is willing to exclude the part of the site controlled by the unwilling landowner from the development site boundary and retain it as part of the Green Belt and suggests Main Modifications in this respect (MM18, MM46 and MM67).

4.5.2 Refer to ED5.3 Appendix 1, page 281 which contains the Council's reply to the landowners representations. This clarifies that the housing and employment requirements set out in the plan would still be met if this part of the site (of around 0.7ha) was excluded from the allocation boundary.

Issue 5 - Infrastructure

5.1 Will the infrastructure to support the scale of development proposed in Biddulph be provided in the right place and at the right time, including that related to transport, the highway network, health, education and open space?

5.1.1 Yes, it will.

5.1.2 Policy SS12 states that development proposals will be required to provide, or meet the reasonable costs of providing the on-site and off-site infrastructure, facilities and/or mitigation necessary to make a development acceptable in planning terms.

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- 5.1.3 The Local Plan is supported by an Infrastructure Delivery Plan (IDP) (ED8.2) that sets out the level of new or improved infrastructure required to deliver the Local Plan. It has been produced through a proactive and on-going process of engagement with all infrastructure providers, including those involved in delivering health, education, utility and highway infrastructure. Table 43 of the IDP (page 131) sets out a schedule of infrastructure requirements, with costings and delivery agencies identified where known. The Council will continue to work with infrastructure providers to ensure the right infrastructure will be delivered in the right place and at the right time.

Issue 6 - Delivery

6.1 Are the assumptions about the rate of delivery of houses from the allocations realistic?

6.1.1 Yes, they are.

6.1.2 The housing trajectory provided at Appendix 7 to the Local Plan Submission Version (SD 1.1) illustrates projected completions over the plan period as of 31 March 2017. An updated trajectory along with background data as of 31 March 2018 is provided at Appendix 3 to the Policy and Strategy Topic Paper (SD 13.5). The Policy and Strategy Topic Paper (paras 2.55 – 2.60) explains how the housing trajectory is underpinned by assumptions regarding the rate of development and sales. This is based on evidence in the Local Plan and Site Allocations Viability Study (SD 24.1) regarding the local housing market combined with officers knowledge and experience of the area.