

Appendix 1 Biddulph Options Planning Analysis & Maps

Appendices to this document:

Appendix A Biddulph Site Options Map

Appendix B Biddulph Option 1 Assessment Table

Appendix C Biddulph Option 2 Assessment Table

Appendix D Biddulph Option 3 Assessment Table and Maps

Appendix E Biddulph Option 4 Assessment Table

Appendix F Biddulph Option 5 Table and Map

Introduction

The starting point for assessment is all the land considered potentially suitable for release from the Green Belt around Biddulph. These areas are identified in the Council's Green Belt Review (November 2015) and subsequent technical notes dated September 2016 and April 2017. (Examination Library https://www.staffsmoorlands.gov.uk/examination_library references 22.4, 22.4a, 22.4b, 22.6 and 22.7). Appendix A contains the location map showing their position.

Area BD117 is included on the map as it is Green Belt land though as it is already an allocation in the plan it is not included in the options assessment. All other areas shown on the map have been assessed.

Details of Assessment Methodology

In determining a way forward, a number of reasonable alternatives have been considered. These are:

Option 1: Do Nothing - proposes that in considering main modifications to the submission Local Plan, no proposals are made to compensate for the loss of housing supply resulting from the deletion of site BDNEW. Suggested main modifications would propose no further land released from the Green Belt for safeguarding or site allocation in Biddulph.

Option 2: Allow targeted Green Belt release around the town to enable additional site allocations where considered deliverable as follows:

1. to the north of Biddulph at Gillow Heath:

- BD062
- BD068
- BD087
- Part of BD138c (Marsh Green Nursery)

2. to the south of Biddulph at Knypersley:

- BD069
- BD131b
- ADD04

3. to the west of Biddulph at Newpool:

- Part of BD063a
- BD011 (Newpool Road Caravan Site)

Option 3: Allow strategic Green Belt release around the town to enable identification of safeguarded land as follows:

- Area to the north of Biddulph at Gillow Heath (BD062, BD068 and BD087).
- Area north of Mill Hayes Road (Knypersley).
- Area south of Brook Street, west of Brown Lees Road (to district boundary).
- Area west of Biddulph Valley Way (incorporating BDNEW and ADD03).

Option 4: Allow both targeted and strategic Green Belt release around the town to enable additional site allocations where considered deliverable and identification of further land for safeguarding as follows:

1. to the north of Biddulph at Gillow Heath:

- BD062
- BD068
- BD087
- Part of BD138c (Marsh Green Nursery)

2. to the south of Biddulph at Knypersley:

- BD069
- BD131b
- ADD04
- 3. to the west of Biddulph at Newpool:
- Part of BD063a
- Newpool Road Caravan Site

Additionally the option proposes to identify the following areas as safeguarded land:

- Area north of Mill Hayes Road (Knypersley) - excluding allocated sites at part 1 above.
- Area south of Brook Street, west of Brown Lees Road (to district boundary).
- Area west of Biddulph Valley Way (incorporating BDNEW and ADD03).

Following the appraisals of options 1 to 4 above, a fifth option was considered. This was:

Option 5: Increase densities at Wharf Road and Tunstall Road to limit the need for Green Belt release as well as limited safeguarding for a future plan period.

This option proposes increased development densities at existing site allocations in Biddulph: Wharf Road Strategic Development Area (Policy DSB1) and Tunstall Road Strategic Development Area (Policy DSB3). In addition the option proposes to identify safeguarded land to the north of Biddulph at Gillow Heath: BD062, BD068 and BD087.

Sustainability Appraisal

All options were the subject of Sustainability Appraisal which assesses significant effects of that option as a whole as well as recommending a suitable option to take forward. The full assessment is contained within the separate document. For ease of reference, the summary of significant effects and SA recommendation has been included alongside the assessment tables in this paper.

The purpose of this paper is to document the detailed site assessment of each site / area within that option, for example, Option 2 includes all of the sites considered suitable for release from the Green Belt. These have been assessed in detail using information from a

number of sources in order to reach a balanced view on which sites within that option would be appropriate.

The results of both the Sustainability Appraisal and the site / area assessments has informed the recommendation made as to an appropriate way forward in relation to future development in Biddulph.

Options Assessment Tables

The tables can be viewed in Appendices B – F. They include the following information:

Estimated Housing Capacity

This is based on 30-40dph unless site specific constraints exist or the landowner / agent has advised the Council what they think the capacity of the site is based on more detailed information. At this time the figure is an estimate and it should be noted that this capacity could change in any future development proposals.

For safeguarded sites, the number of years supply is included as a guide only. It is based on 63 dwellings p/a used is Biddulph's total housing supply based on current Local Plan Strategy and OAN. Clearly as we are looking beyond the plan period, this assumes that the spatial strategy and OAN stay the same for the next plan period.

Approximate Site Size (ha)

This is either based on a measurement from the Council's mapping software or information provided by the owner / agent.

No. of Potential Dwellings Deliverable within 5 Years (allocations only)

For each site the number of dwellings deliverable within 5 years, and therefore contributing to the Council's 5 year land supply following the adoption of the Local Plan has been estimated. This is based on delivery assumptions in the Housing Implementation Strategy regarding lead-in times and build out rates.

Suitable Land Use(s)

This is based on either the type of land use being promoted by the land owner / agent or by judgment where this information is not available or relates to a larger area which may be suitable for safeguarding.

Green Belt Assessment

Green Belt information is from the Council's Green Belt Review.

Landscape Impact

Landscape impact is from the Council's Landscape, Local Green Space and Heritage Impact Study.

Heritage Impact

Heritage impact is from the Council's Landscape, Local Green Space and Heritage Impact Study.

Agricultural Land Classification

This is from Natural England data.

Highways

Highway information is from the Highway Authority, Staffordshire County Council.

Land Availability

This has been determined through Council contact with the land owner / agent.

Other Relevant Information

Safeguarding Land

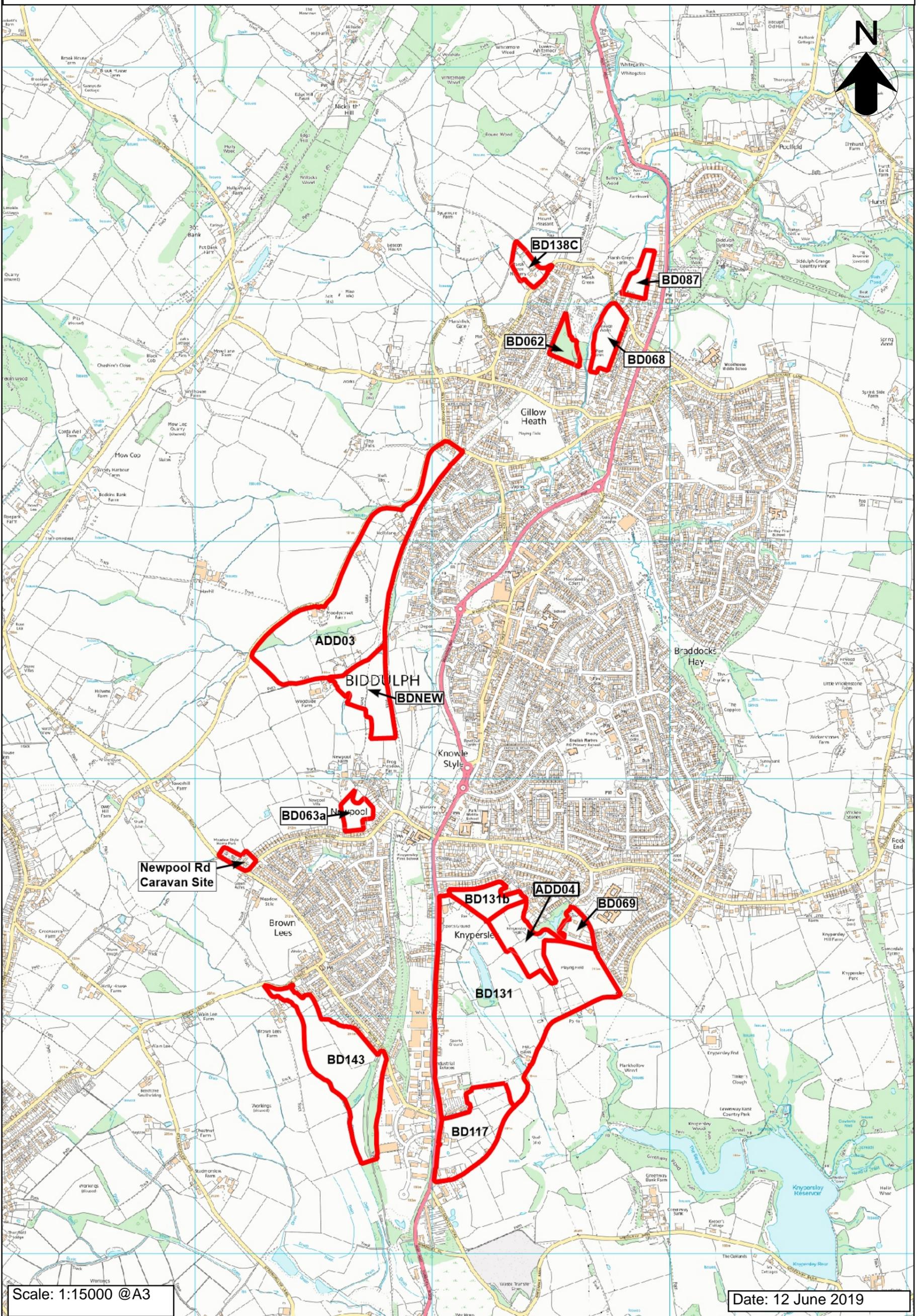
Safeguarding land is not the same as allocating land. The intention is that it is set aside to meet future needs (rather than needs within the plan period like an allocation). There is no guarantee that it will become an allocation though at the time of a Local Plan Review any safeguarded land would be considered first. It may not be needed in certain circumstances, for example - if the housing requirement for the District decreases in the future, if less development is required in Biddulph, if urban land availability increases or densities increase but it provides a buffer to ensure that Green Belt boundaries around Biddulph do not need to be changed during the next plan period i.e. they have a degree of permanence.

Paragraph 83 of the 2012 NPPF (on which the plan is being examined) requires the Council to "consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period." Paragraph 85 requires Councils to:

- where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;
- make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;
- satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period;
- define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

Proportional evidence has been gathered for each possible area. In contrast to site allocations which need to be delivered within the plan period, a more long-term view of constraints for safeguarded land can be taken. For instance, the availability of land can change over the long term. Also, the same level of detailed information as would be needed for an allocation is not necessarily required when land is safeguarded as the position would be reviewed in the next plan before an allocation was made.

Biddulph Sites Suitable for Green Belt Release in Green Belt Review



Scale: 1:15000 @A3

Date: 12 June 2019

Appendix B

Biddulph Option 1 Assessment Table - Do Nothing

BDNEW not replaced. No further land released from the Green Belt for safeguarding or site allocation in Biddulph.

Sustainability Appraisal - Summary of Significant Effects

The "do nothing" approach would enable the delivery of planned growth in Biddulph over the short to medium term - this assumes continuation of the current housing requirement by area (20% of 320 for Biddulph) under which approach this option provides a supply of 9.9 years for Biddulph*. (Delivery would be monitored as part of a Local Plan review.) However this option would fail to identify additional sites for long term development or safeguarding at this stage in the plan making process. In comparison with other options, this is expected to lead to long term positive effects on the protection of best and most versatile agricultural land, mineral safeguarded areas, landscape setting of the town and other natural and heritage assets including green infrastructure and ecological networks. Further long term positive effects are expected in relation to support for walking and cycling and air quality.

However a failure to plan more comprehensively for the long term housing needs of the town at this stage in the plan making process risks a failure to meet local housing need in the longer term, with significant negative effects predicted for the objective to provide homes to meet local need. It may also lead to a failure to deliver the appropriate range of types and tenures to meet the needs of the whole community. Further long term negative impacts are predicted for the housing market and this may restrict opportunities for investment in culture and tourism which could result in negative effects on the local economy. The option has also been assessed as likely to result in long term negative effects on helping to safeguard the vitality and viability of the town centre, as an under supply of housing can impair labour mobility, resulting in businesses finding it difficult to recruit and retain staff.

SA Recommendation

Dismiss this option.

Option Assessment

	Option 1: Do Nothing
Estimated Housing Capacity	n/a
Approximate Site Size (Hectares)	n/a
Suitable Land Use(s)	n/a
Impact on Green Belt Purpose: Check Sprawl	n/a
Impact on Green Belt Purpose: Maintain Separation	n/a
Impact on Green Belt Purpose: Prevent Encroachment	n/a
Impact on Green Belt Purpose: Preserve Setting	n/a
Impact on Green Belt Purpose: Assist Regeneration	n/a
Overall Impact on Green Belt Purposes	n/a
Larger GB parcel	n/a
Landscape Impact	n/a
Agricultural Land Classification	n/a
Highways	n/a
Land Availability 'reasonable prospect of delivery'	n/a
Other Site Issues / Constraints	n/a

	<p>Option 1:</p> <p>Do Nothing</p>
<p>Pros and Cons of this approach</p>	<p><u>Pros:</u></p> <ul style="list-style-type: none"> • The Council can demonstrate a 5 year housing land supply and specific sites for years 6-10 of the Local Plan upon its adoption without further land allocations in Biddulph to replace BDNEW so new allocations are not required to be compliant with the NPPF. • Would allow Council to consider Green Belt release as a whole in the District at the time of the next Local Plan Review (the medium to long term). New housing requirements and potential future regeneration initiatives could potentially have implications for the distribution of Green Belt release in the District which are not yet known. Also the implications of the distribution of windfall development across the District and consequently the potential need for any Green Belt release will be known. <p><u>Cons:</u></p> <ul style="list-style-type: none"> • Less housing land supply for the plan period (though still NPPF compliant). • Decisions about Green Belt release would be pushed back to the medium – long term. However, Paragraph 85 of the NPPF requires that local authorities should satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period. This matter has been raised by the Inspector. • It is possible that further Green Belt release will be required to support growth in Biddulph in the next Local Plan.
<p>NOT RECOMMENDED TO TAKE THIS OPTION FORWARD</p>	<p>REASON:</p> <p>Although this option meets the NPPF requirement of a 5 year housing land supply and specific sites for years 6-10 of the Local Plan upon its adoption, it does not provide for potential growth beyond the current town boundary in future Local Plans.</p> <p>The Sustainability Appraisal does not recommend this option due to the risk of failing to meet the long-term housing needs of the whole community and constraining investment in the town centre and local economy. It states that the option would not help ensure that Green Belt boundaries can</p>

	<p>Option 1:</p> <p>Do Nothing</p>
	<p>endure in the long term; nor address how the longer-term development needs of Biddulph and its environs could be met. With these factors in mind it is not considered appropriate to take this option forward.</p>

*This figure acts as a useful benchmark but it should be noted that the NPPF does not require the District wide 10 year housing site supply to be broken down to town level.

Appendix C

Biddulph Option 2 Assessment Table – Allow targeted Green Belt release around the town to enable additional site allocations where considered deliverable

Sustainability Appraisal - Summary of Significant Effects

This option envisages targeted Green Belt release around Biddulph to enable additional site allocations where considered deliverable. Omission sites may be allocated to the north at Gillow Heath, to the south at Knypersley and to the west at Newpool. This release may provide for around an additional 500 homes which would represent around 8 years housing supply for the town. This could be expected to help meet the future housing needs of the community and enable the delivery of a range of housing types and tenures. Allocating sites at this stage in the plan making process will help provide certainty that long term housing needs can be met and a range of sites will allow choice and flexibility for the market. A further positive effect of the option is the opportunity it provides in the main to avoid loss of best and most versatile agricultural land.

This option could in the long term deliver development within 500m of a bus stop and within 800m of the town centre with its range of key services and facilities. This is likely to result in positive effects on: improving access to jobs, services and facilities (which in turn is likely to advance equality of opportunity), improving access to health care, helping to safeguard the vitality and viability of the town centre, providing support for walking and cycling and reducing the need to travel by car. This is likely to result in positive effects on the town centre and may help support opportunities for investment in culture and tourism with positive effects on the local economy.

However there is potential for the cumulative impacts of development to result in the disturbance of habitats (and their connectedness). This option is also likely to result in the development of sites subject to risk from flooding. Dependent on proposal specific information, there is risk that the cumulative impact of any future development under this option could result in harm or loss to the significance of designated heritage assets and their setting, and an adverse impact on landscape character. The option has also been assessed as likely to result in minor negative effects in relation to air quality and greenhouse gas emissions, neighbourhood quality (residual risk of odour and noise and potential constraints on future investment in key infrastructure) and energy consumption arising from construction and occupation of new developments.

SA Recommendation

Dismiss this option.

Assessment of Possible Site Allocations (refer to site location plan in Appendix A)

	BD062 Land north of York Close & Essex Drive	BD068 Land west of Portland Drive	BD087 Land off Beaumont Close	BD138c Marsh Green Nursery	BD069 Former Nursery adjoining Knypersley Hall	BD131b Land off Harlech Drive	ADD04 Land off Mill Hayes Road	Part of BD063a Land off Newpool Road	Newpool Road Caravan Site
Estimated Housing Capacity*	35	70	15	44	30	80	150	40	23
Approximate Site Size (Hectares)	1.2	2.3	0.8	1.52	1.02	2.72	4.4	1.37	0.74
No. of Potential Dwellings Deliverable within 5 years**	35	45	15	37	30	45	45	37	23
Suitable Land Use(s)	Residential	Residential	Residential	Residential	Residential	Residential	Residential	Residential	Residential
Impact on Green Belt Purpose: Check Sprawl	Limited contribution	Limited contribution	Limited contribution	Limited contribution	Limited contribution	Limited contribution	Limited contribution	Contribution	Contribution
Impact on Green	Limited contribution	Limited contribution	Limited	Contribution	Limited contribution	Limited contribution	Contribution	Significant	Limited

	BD062 Land north of York Close & Essex Drive	BD068 Land west of Portland Drive	BD087 Land off Beaumont Close	BD138c Marsh Green Nursery	BD069 Former Nursery adjoining Knypersley Hall	BD131b Land off Harlech Drive	ADD04 Land off Mill Hayes Road	Part of BD063a Land off Newpool Road	Newpool Road Caravan Site
Belt Purpose: Maintain Separation			contribution					contribution	contribution
Impact on Green Belt Purpose: Prevent Encroachment	Limited contribution	Limited contribution	Limited contribution	Limited contribution	Limited contribution	Limited contribution	Limited contribution	Significant contribution	Limited contribution
Impact on Green Belt Purpose: Preserve Setting	Contribution	Contribution	Limited contribution	Limited contribution	Contribution	Contribution	Contribution	Significant contribution	Limited contribution
Impact on Green Belt Purpose: Assist Regeneration	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Overall Impact on Green Belt Purposes	Limited	Limited	Limited	Limited	Limited	Limited	Moderate	Significant	Limited
Larger GB parcel	Part of N7 “there is a well enclosed sub-parcel north of Marsh Green Road between the disused railway line and the A527 which could hold potential for removal without significant damage to the Green Belt given its enclosed character and strong boundaries.”	Part of N7 “there is a well enclosed sub-parcel north of Marsh Green Road between the disused railway line and the A527 which could hold potential for removal without significant damage to the Green Belt given its enclosed character and strong boundaries.”	Part of N7 “there is a well enclosed sub-parcel north of Marsh Green Road between the disused railway line and the A527 which could hold potential for removal without significant damage to the Green Belt given its enclosed character and strong boundaries.”	Part of N7	Part of parcel N17 (north of Mill Hayes Road) “is a relatively sustainable location plus a logical extension to the built form of Biddulph.”	Part of parcel N17 (north of Mill Hayes Road) “is a relatively sustainable location plus a logical extension to the built form of Biddulph.”	Part of parcel N17 (north of Mill Hayes Road) “is a relatively sustainable location plus a logical extension to the built form of Biddulph.”	Part of N10	Part of N10
Landscape Impact	Low landscape sensitivity	Low landscape sensitivity	Low landscape sensitivity	Not known	Medium landscape sensitivity	Not known	High landscape sensitivity	Low landscape sensitivity	Not known
Heritage Impact	No	No	No	Not known	Yes	Not known	Yes	No	Not known
Agricultural Land Classification	Urban / Industrial Land	Urban / Industrial Land	Urban / Industrial Land	Urban / Industrial Land	Moderate (20% to 60% area bmv)	Urban / Industrial Land	Part Urban / Industrial Land and part Moderate (20% to 60% area bmv)	Urban / Industrial Land	Moderate (20% to 60% area bmv)
Highways	Acceptable in principle	Acceptable in principle	Acceptable in principle	Poor geometry and alignment of Marsh Green Road – would need widening and	Acceptable in principle	Acceptable in principle	Acceptable in principle	Acceptable in principle	Acceptable in principle

	BD062 Land north of York Close & Essex Drive	BD068 Land west of Portland Drive	BD087 Land off Beaumont Close	BD138c Marsh Green Nursery	BD069 Former Nursery adjoining Knypersley Hall	BD131b Land off Harlech Drive	ADD04 Land off Mill Hayes Road	Part of BD063a Land off Newpool Road	Newpool Road Caravan Site
				BD083 in particular would need to be part of this.					
Land Availability 'reasonable prospect of delivery'	Availability confirmed	Availability confirmed	Availability confirmed	Availability confirmed	Availability confirmed	Land not currently available. It is not known whether there is any likelihood of this position changing.	Availability confirmed	Availability confirmed	Availability confirmed
Other Site Constraints	<p>United Utilities (UU) Water Treatment Works adjacent. Council has had recent contact to clarify UUs position in relation to sites located adjacent to their premises (including BD062). In their latest correspondence dated 31st May 2019, UU do not object to any development on the adjacent land. They wish to continue to express their strong preference for development to take place in an alternative location that is not immediately adjacent to the treatment works due to the residual risks of odour and noise arising on occasions.</p>	<ul style="list-style-type: none"> • United Utilities (UU) Water Treatment Works adjacent. Council has had recent contact to clarify UUs position in relation to sites located adjacent to their premises (including BD068). In their latest correspondence dated 31st May 2019, UU do not object to any development on the adjacent land. They wish to continue to express their strong preference for development to take place in an alternative location that is not immediately adjacent to the treatment works due to the residual risks of odour and noise arising on occasions. • Capacity constrained as site boundary has 	<ul style="list-style-type: none"> • Land in Flood Zone 2 is <i>excluded</i> from the site 0.8ha is the net site size. • Access to site (though owner states an agreement has been reached with County Highways involving provision of a bridge over the brook). 	<ul style="list-style-type: none"> • Highway issues above which are not straightforward to resolve given that third party land would be needed in order to widen Marsh Green Road. This land is also in the Green Belt and deemed unsuitable for release in Green Belt Review. • Information on landscape and heritage impact would need to be gathered. 	<p>Due to Knypersley Hall being a listed building, Historic England have been contacted for advice relating to heritage constraints. Based on the information available at this time they advise that they would be likely to object future development. Further work would need to be undertaken to determine the impact of any development on the setting of the heritage asset. (Links to HE guidance notes have been provided to assist). Examination Library Document 22.9 gives the Council's heritage consultant's view on supplementary evidence provided by the owner's agent (library doc 1.4 p.8865 – 8896) and concludes that</p>	<ul style="list-style-type: none"> • Availability of land. • Information on landscape and heritage impact would need to be gathered. 	<ul style="list-style-type: none"> • Due to Knypersley Hall being a listed building, Historic England have been contacted for advice relating to heritage constraints. Based on the information available at this time they advise that they would be likely to object future development. Further work would need to be undertaken to determine the impact of any development on the setting of the heritage asset. (Links to HE guidance notes have been provided to assist). • High landscape sensitivity. • The Highway Authority's preference is for development to be accessed 	<p>Significant overall impact on Green Belt - Green Belt Review says " 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."</p>	<p>Information on landscape and heritage impact would need to be gathered.</p>

	BD062 Land north of York Close & Essex Drive	BD068 Land west of Portland Drive	BD087 Land off Beaumont Close	BD138c Marsh Green Nursery	BD069 Former Nursery adjoining Knypersley Hall	BD131b Land off Harlech Drive	ADD04 Land off Mill Hayes Road	Part of BD063a Land off Newpool Road	Newpool Road Caravan Site
		been pulled back to exclude land in Flood Zone 2 (immediately adjacent to Biddulph Brook).			if the number of dwellings were significantly reduced (from 30) harm could be reduced to less than substantial. It also concludes that there are other sites which are less constrained in heritage terms in Biddulph.		from the A527, though there may be an opportunity to access a smaller proportion of development via Harlech Drive. • 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.		
Pros and Cons of this approach	<p><u>Pros:</u></p> <ul style="list-style-type: none"> • Would increase housing supply. <p><u>Cons:</u></p> <ul style="list-style-type: none"> • United Utilities whilst not objecting to development on neighbouring land to their waste water treatment works, express a strong preference for development to take place in an alternative location that is not immediately adjacent to the treatment works due to the residual risks of odour and noise arising on occasions. 	<p><u>Pros:</u></p> <ul style="list-style-type: none"> • Would increase housing supply. • Site owner identifies potential for wider community benefits associated with development. <p><u>Cons:</u></p> <ul style="list-style-type: none"> • United Utilities whilst not objecting to development on neighbouring land to their waste water treatment works, express a strong preference for development to take place in 	<p><u>Pros:</u></p> <ul style="list-style-type: none"> • Would increase housing supply. • Site owner identifies potential for wider community benefits associated with development. <p><u>Cons:</u></p> <ul style="list-style-type: none"> • Site capacity reduced due to the need to avoid building in Flood Zone 2. • It is unknown whether the creation of a suitable access (a bridge) will 	<p><u>Pros:</u></p> <ul style="list-style-type: none"> • Would increase housing supply. <p><u>Cons:</u></p> <ul style="list-style-type: none"> • Highway constraints. 	<p><u>Pros:</u></p> <ul style="list-style-type: none"> • Would increase housing supply. <p><u>Cons:</u></p> <ul style="list-style-type: none"> • Heritage constraints would need to be overcome to the satisfaction of Historic England which at best would mean a low site capacity. • Moderate BMV agricultural land classification. 	<p><u>Pros:</u></p> <ul style="list-style-type: none"> • Would increase housing supply. <p><u>Cons:</u></p> <ul style="list-style-type: none"> • Land not currently available and it is not known whether this situation may change in the future. 	<p><u>Pros:</u></p> <ul style="list-style-type: none"> • Would increase housing supply. <p><u>Cons:</u></p> <ul style="list-style-type: none"> • Heritage constraints would need to be overcome to the satisfaction of Historic England which is likely to affect site capacity, which is uncertain at present. • Other constraints to overcome – highways, geological, landscape, 	<p><u>Pros:</u></p> <ul style="list-style-type: none"> • Would increase housing supply. <p><u>Cons:</u></p> <ul style="list-style-type: none"> • Significant impact on Green Belt purposes. 	<p><u>Pros:</u></p> <ul style="list-style-type: none"> • Would increase housing supply. <p><u>Cons:</u></p> <ul style="list-style-type: none"> • Moderate BMV agricultural land classification.

	BD062 Land north of York Close & Essex Drive	BD068 Land west of Portland Drive	BD087 Land off Beaumont Close	BD138c Marsh Green Nursery	BD069 Former Nursery adjoining Knypersley Hall	BD131b Land off Harlech Drive	ADD04 Land off Mill Hayes Road	Part of BD063a Land off Newpool Road	Newpool Road Caravan Site
		an alternative location that is not immediately adjacent to the treatment works due to the residual risks of odour and noise arising on occasions.	be viable for this small site though the owner considers that it would.				moderate BMV agricultural land classification.		
Ranking***	Rank 1 Limited overall impact on Green Belt purposes (site only makes a contribution to one of the green belt purposes and a limited contribution to the rest) Whilst United Utilities would prefer that development took place elsewhere, they don't make a formal objection and constraints exist on other alternative sites. Consequently, on planning balance, the limited overall impact on the Green Belt and lack of other constraints gives this site a high ranking.	Rank 1 Limited overall impact on Green Belt purposes (site only makes a contribution to one of the green belt purposes and a limited contribution to the rest) Whilst United Utilities would prefer that development took place elsewhere, they don't make a formal objection and constraints exist on other alternative sites. Consequently, on planning balance, the limited overall impact on the Green Belt and lack of other constraints gives this site a high ranking.	Rank 1 Limited overall impact on Green Belt purposes (site makes a limited contribution to all the Green Belt purposes). Lack of other constraints.	Rank 4 Highway constraints very difficult to overcome as they involve third party land which Green Belt Review states is not suitable for release from the Green Belt.	Rank 2 Sustainable location, acceptable for removal from Green Belt but heritage constraints. If this site is needed for inclusion, capacity would need to be significantly reduced to a level which would lead to 'less than substantial harm' as per the NPPF test and this harm would then need to be weighted against public benefits of this proposal (para. 134). If this site were selected, policy should require the developer to meet the NPPF tests to the satisfaction of Historic England.	Rank 4 Land not available.	Rank 3 Moderate impact on Green Belt purposes and other constraints - heritage, landscape, highways and geological. If this site is needed for inclusion, the accompanying policy should require the developer to meet the NPPF tests to the satisfaction of English Heritage.	Rank 4 As the key reason for the Inspector asking for the removal of BDNEW was impact on the Green Belt, evidence indicates that this site, in light of its relatively poorly contained character, would have a damaging impact on the Green Belt and consequently would not be appropriate to include as a replacement.	Rank 1 Limited overall impact on Green Belt purposes (site only makes a contribution to one of the green belt purposes and a limited contribution to the rest). Lack of other constraints.

NOT RECOMMENDED TO TAKE THIS OPTION FORWARD

REASON:

The Council can demonstrate a 5 year housing land supply and specific sites for years 6-10 of the Local Plan upon its adoption without further land allocations in Biddulph to replace BDNEW so new allocations are not required to be compliant with the NPPF. In light of this, any release of Green Belt land requires the demonstration of exceptional circumstances which would be difficult to justify.

The Sustainability Appraisal does not recommend this option due to the potential for cumulative impacts from development such as harm or loss of significance of designated heritage assets, negative impacts on landscape, biodiversity and green infrastructure, amenity issues and an increase in the risk of flooding. It also states that the option would not help ensure that Green Belt boundaries can endure in the long term; nor address how the longer term development needs of Biddulph and its environs could be met.

Footnotes:

* Based on 30-40dph (unless site specific constraints exist).

**This is based on the 2012 NPPF definition of deliverable (p.12 footnote 11 "To be considered deliverable, sites should be available now, offer a suitable location for development now and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. 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, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans.")

*** In order to differentiate between the sites, they have been ranked taking into account known constraints with Rank 1 sites being the most suitable if allocations are needed and Rank 4 sites being the least suitable.

Appendix D

Biddulph Option 3 Assessment Table – Allow strategic Green Belt release around the town to enable identification of safeguarded land.

Sustainability Appraisal - Summary of Significant Effects

This option envisages allowing strategic Green Belt release around Biddulph to enable identification of safeguarded land. Safeguarding land will help to meet longer term development needs beyond the plan period. Safeguarded land may in the longer term provide for around 1,500 homes. Subject to the safeguarded land including sites that are available and deliverable, this could be expected to help make a significant contribution to meeting the future housing needs of the community and enable the delivery of a range of housing types and tenures beyond the plan period. However it should be noted that safeguarding land without additional site allocations may require an early Local Plan review to ensure that housing land supply continues to be sufficient to meet identified housing need to the end of the plan period.

This option could in the long term deliver development within 500m of a bus stop and within 1,200m of the town centre with its range of key services and facilities. This is likely to result in positive effects on: improving access to jobs, services and facilities (which in turn is likely to advance equality of opportunity), helping to safeguard the vitality and viability of the town centre, providing support for walking and cycling and reducing the need to travel by car. This is likely to result in long term positive effects on the town centre and may help support opportunities for investment in culture and tourism with positive effects on the local economy. These benefits would arise beyond the plan period.

However the strategic location proposed to the south includes a playing field, public footpath and sports grounds, the future of these assets for continuing to provide positive benefits for the health and well-being of the community must be taken into account. Dependent on proposal specific information, there is potential for the cumulative impacts of longer term development to result in the harm or loss to the significance of designated heritage assets and their settings (particularly in relation to Knypersley Hall and its landscape park), the disturbance of habitats (and their connectedness) and adverse impact on landscape character. Land to the west of the Biddulph Valley Way in particular is considered to be of high landscape sensitivity and development here may adversely affect the existing settlement edge. These negative impacts would arise beyond the plan period.

The option has also been assessed as likely to result in further negative effects in relation to mineral resources, geological resources (Knypersley Meltwater channel), air quality and greenhouse gas emissions, neighbourhood quality (residual risk of odour and noise and potential constraints on future investment in key infrastructure at Biddulph waste water treatment works), energy consumption arising from construction and occupation of new developments and increased risk of surface water flooding.

SA Recommendation

Dismiss this option.

Assessment of Possible Areas for Safeguarding

Options for safeguarding areas have focussed on the identification of large areas or clusters of sites having regards to:

- Whether the area is strategic in nature and / or
- Whether the land is part of a cluster of sites adjacent to or in close proximity to each other

Sites of a more individual or scattered nature have been assessed as allocations instead.

	Area North of Mill Hayes Road, Knypersley	Area west of BVW (incorporating BDNEW and ADD03)	Area to the north of Biddulph at Gillow Heath (BD062, BD068 and BD087)	Area south of Brook Street, west of Brown Lees Road (to district boundary)
	Refer to Map A (below)	Refer to Map B (below)	Refer to Map C (below)	Refer to Map D (below)
Estimated Housing	758 but further work needed on impact to	660	120	310

	Area North of Mill Hayes Road, Knypersley	Area west of BVW (incorporating BDNEW and ADD03)	Area to the north of Biddulph at Gillow Heath (BD062, BD068 and BD087)	Area south of Brook Street, west of Brown Lees Road (to district boundary)
	Refer to Map A (below)	Refer to Map B (below)	Refer to Map C (below)	Refer to Map D (below)
Capacity*	setting of heritage assets which could reduce this figure 12 years supply (no windfall assumption made)	10.5 years supply (no windfall assumption made)	1.9 years supply (no windfall assumption made)	4.9 years supply (no windfall assumption made)
Approximate Site Size (Hectares)	Mill Hayes 25.25ha net (excludes constrained land, sports pitches, existing houses and businesses)	18.4ha	7.5ha	10.1ha
Suitable Land Use(s)	Residential / Employment	Residential	Residential	Residential / Employment
Impact on Green Belt Purpose: Check Sprawl	Limited Contribution	Contribution	Limited contribution	Limited Contribution
Impact on Green Belt Purpose: Maintain Separation	Contribution	Limited Contribution	Limited contribution	Limited Contribution
Impact on Green Belt Purpose: Prevent Encroachment	Limited Contribution	Significant Contribution (Akesmoor) Contribution (BDNEW)	Limited contribution	Contribution
Impact on Green Belt Purpose: Preserve Setting	Contribution	Contribution	Contribution	Contribution
Impact on Green Belt Purpose: Assist Regeneration	n/a	n/a	n/a	n/a
Overall Impact on Green Belt Purposes	Moderate	Moderate	Limited	Limited
Larger GB parcel	Whole of parcel N17 (north of Mill Hayes Road) "is a relatively sustainable location plus a logical extension to the built form of Biddulph".	Part of N10	Part of N7 "there is a well enclosed sub-parcel north of Marsh Green Road between the disused railway line and the A527 which could hold potential for removal without significant damage to the Green Belt given its enclosed character and strong boundaries."	N10
Landscape Impact	Landscape Impact Assessment of whole area required. Partial assessment shows high sensitivity adjacent to Knypersley Hall and medium sensitivity adjacent to Knypersley Hall Garden.	High landscape sensitivity	Low landscape sensitivity	Not known
Heritage Impact	Heritage Impact Assessment of the whole area required. Partial assessment shows substantial impact in the area adjacent to Knypersley Hall and adjacent to Knypersley Hall Garden. Historic England has advised the Council that further detailed heritage work would be required before they could support development in this area.	Yes (northern part of Akesmoor Lane)	No	Not known
Agricultural Land Classification	Mix of Urban / Industrial Land and moderate land (i.e. 20-60% of area bmv)	Mix of Low (i.e. <= 20% area bmv) and moderate land (i.e. 20-60% of area bmv)	Urban / Industrial Land	Moderate land (i.e. 20-60% of area bmv)
Highways	Acceptable in principle	Acceptable in principle	Acceptable in principle	The plot only has a frontage onto the

	Area North of Mill Hayes Road, Knypersley Refer to Map A (below)	Area west of BVW (incorporating BDNEW and ADD03) Refer to Map B (below)	Area to the north of Biddulph at Gillow Heath (BD062, BD068 and BD087) Refer to Map C (below)	Area south of Brook Street, west of Brown Lees Road (to district boundary) Refer to Map D (below)
				<p>highway at the north end, onto Brook Street which would not be suitable as a main access.</p> <p>It would be more acceptable to provide a main access onto Brown Lees Road further towards A527 Tunstall Road, though this would require the purchase of additional land (and house/s). A secondary access onto Brook Street would be acceptable in principle. Access onto A527 would also likely need to be improved.</p>
Land Availability 'reasonable prospect of delivery'**	Availability of proportion of the area confirmed with supporting technical evidence for a small proportion of the area. Ownership for part of the area is unknown.	Availability of proportion of the area confirmed. Ownership for part of the area is unknown.	Availability confirmed with supporting technical evidence from land owners	Availability confirmed
Other Site Constraints	<ul style="list-style-type: none"> Heritage constraints exist around Knypersley Hall, a Listed Building. Historic England have been contacted for advice relating to heritage constraints. Based on the information available at this time they advise that they would be likely to object to the site being safeguarded for future development. Further work would need to be undertaken to determine the impact of any development on the setting of the heritage asset. (Links to HE guidance notes have been provided to assist). Part of area has geological constraints (RIGS designation). This has been removed from net site capacity calculation. Land in multiple ownerships 10+ (known) ownerships, some of these unwilling to make their land available for development. Area includes sports clubs and school playing field (though these have been removed from net site capacity calculation). Information on landscape and heritage impact for the whole area would need to be gathered. 	<ul style="list-style-type: none"> Inspector has asked for BDNEW (south eastern part of this area) to be deleted from the plan on the grounds of Green Belt and Landscape Impact in his 'Post Hearing Advice Note'. Council's study identifies heritage impact to northern part of area around Grade II Listed Building and recommends that development is restricted to the southern part of the site only and with appropriate screening. Land is in multiple ownerships – 11 (known) ownerships, some of these unwilling to make their land available for development in central part of the site. Some parcels of land are not registered so owners are unknown. High landscape sensitivity across whole area. Mining legacy (Coal Authority do not see this as a barrier to redeveloping sites in principle though it will be a development cost). 	<ul style="list-style-type: none"> Most of the land is adjacent to the United Utilities (UU) Water Treatment Works. Council has had recent contact to clarify UUs position in relation to this issue. In their latest correspondence dated 31st May 2019, UU do not object to any development on the adjacent land. They wish to continue to express their strong preference for development to take place in an alternative location that is not immediately adjacent to the treatment works due to the residual risks of odour and noise arising on occasions. Biddulph Brook runs through centre of area. Flood Zone 2 immediately adjacent which constrains capacity as it has been assumed that no development will take place within this zone. 	<ul style="list-style-type: none"> Highways (above). Mining legacy - high risk development area (surface mining) but no mine entries are shown on the site. Coal Authority do not see this as a barrier to redeveloping sites in principle though it will be a development cost.

	Area North of Mill Hayes Road, Knypersley Refer to Map A (below)	Area west of BVW (incorporating BDNEW and ADD03) Refer to Map B (below)	Area to the north of Biddulph at Gillow Heath (BD062, BD068 and BD087) Refer to Map C (below)	Area south of Brook Street, west of Brown Lees Road (to district boundary) Refer to Map D (below)
Pros and Cons of this approach	<p><u>Pros:</u></p> <ul style="list-style-type: none"> Enables Green Belt boundaries to have a degree of permanence beyond the plan period. This area is specifically identified in the Green Belt Review as being “a logical extension to the built form of Biddulph.” <p><u>Cons:</u></p> <ul style="list-style-type: none"> Would not increase the number of years housing supply in Biddulph as safeguarded land does not count towards supply. Heritage constraints would need to be overcome to the satisfaction of Historic England before the area is safeguarded in the Local Plan. This is likely to affect development levels. Other site constraints – geology, sports uses, availability of land.** 	<p><u>Pros:</u></p> <ul style="list-style-type: none"> Enables Green Belt boundaries to have a degree of permanence beyond the plan period. <p><u>Cons:</u></p> <ul style="list-style-type: none"> Would not increase the number of years housing supply in Biddulph as safeguarded land does not count towards supply. Inspector has asked for BDNEW to be deleted from the plan on the grounds of Green Belt and Landscape Impact in his ‘Post Hearing Advice Note’. Site constraints – in particular heritage to the north and also landscape and availability of land.** 	<p><u>Pros:</u></p> <ul style="list-style-type: none"> Enables Green Belt boundaries to have a degree of permanence beyond the plan period. Least harmful overall to Green Belt purposes (only makes a limited contribution to three of the five green belt purposes) <p><u>Cons:</u></p> <ul style="list-style-type: none"> Would not increase the number of years housing supply in Biddulph as safeguarded land does not count towards supply. United Utilities whilst not objecting to development on neighbouring land to their waste water treatment works, express a strong preference for development to take place in an alternative location that is not immediately adjacent to the treatment works due to the residual risks of odour and noise arising on occasions. 	<p><u>Pros:</u></p> <ul style="list-style-type: none"> Enables Green Belt boundaries to have a degree of permanence beyond the plan period. Only a small number of owners involved. <p><u>Cons:</u></p> <ul style="list-style-type: none"> Would not increase the number of years housing supply in Biddulph as safeguarded land does not count towards supply. Highway and mining constraints.
Ranking***	<p>Rank 2 Moderate overall impact on Green Belt purposes.</p> <p>Recommended for consideration for release beyond the plan period in the Green Belt Review. Although there are constraints with parts of the area it is so large that pockets of development outside of the most constrained parts would still produce a significant number of dwellings.</p>	<p>Rank 3 Moderate overall impact on Green Belt purposes.</p> <p>Do not recommend the inclusion of BDNEW as the Inspector considers that this is not consistent with the evidence base and would consequently make the Local Plan unsound so that the Council is not able to adopt it. Also, although some constraints (like owners not wanting to release land) may change over time, the heritage ones associated with the northern part of ADD03 are unlikely to change and the landscape issues associated with the southern part of ADD03 are unlikely to change. This doesn’t leave a great deal of land left to safeguard.</p>	<p>Rank 1 Limited overall impact on Green Belt purposes (area only makes a contribution to one of the green belt purposes and a limited contribution to the rest) and therefore scores least harmful in terms of Green Belt purposes.</p> <p>This area is relatively small scale compared with the other safeguarding options so by its very nature future development here would have the lowest impact on the Green Belt. It also has the lowest quality agricultural land classification</p> <p>Whilst United Utilities would prefer that development took place elsewhere, they don’t make a formal objection and constraints exist on other alternative sites. Consequently, on planning balance, the limited overall impact on the Green Belt and lack of other constraints gives this area the highest ranking.</p>	<p>Rank 2 Limited overall impact on Green Belt purposes (though area makes a contribution to two of the Green Belt purposes and a limited contribution to the rest).</p> <p>Area has limited known constraints.</p>

NOT RECOMMENDED TO TAKE THIS OPTION FORWARD ALONE BUT ALONGSIDE OTHER MEASURES – SEE OPTION 5**REASON:**

Safeguarding land in the Local Plan is recommended as an appropriate course of action to address the Inspector's comments in his Post Hearing Advice Note that "...consideration should be given as to whether it would be appropriate to identify areas of 'safeguarded land' in order to meet longer term development needs in Biddulph." The areas have been ranked according to known constraints. However, as well as safeguarding, additional action is also recommended (refer to Option 5)

The Sustainability Appraisal does not recommend this option alone due to risks that long term housing needs cannot be met during and beyond the plan period. It also identifies the potential for cumulative impacts from development such as harm or loss of significance of designated heritage assets, negative impacts on landscape, biodiversity, settlement edge and green infrastructure, amenity issues and an increase in the risk of flooding.

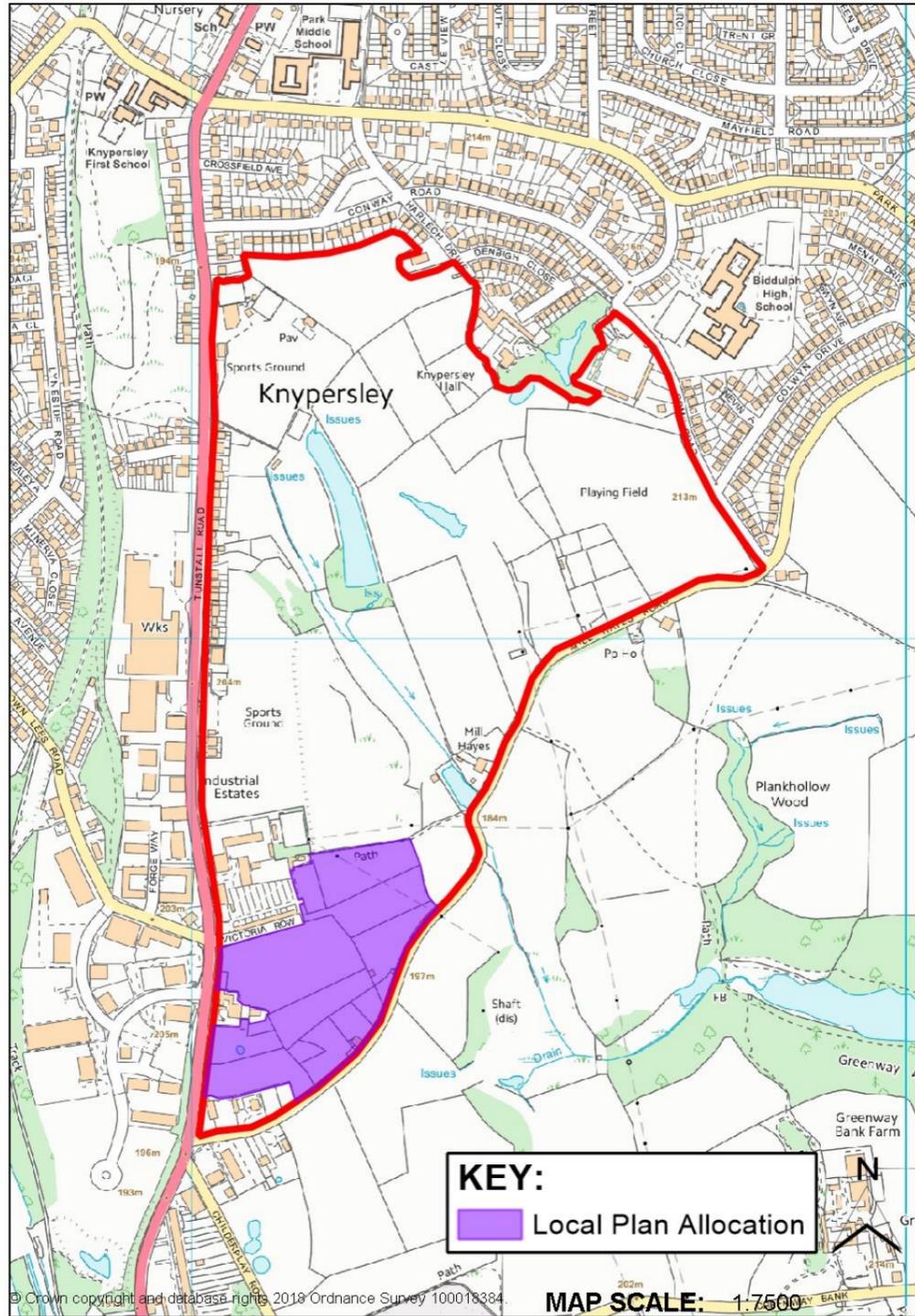
Footnotes

*Based on 30-40dph (unless site specific constraints exist). Number of years supply is included as a guide only. The 63 dwellings p/a used is Biddulph's total housing supply based on current Local Plan Strategy and OAN. Clearly as we are looking beyond the plan period, this assumes that the spatial strategy and OAN stay the same for the next plan period.

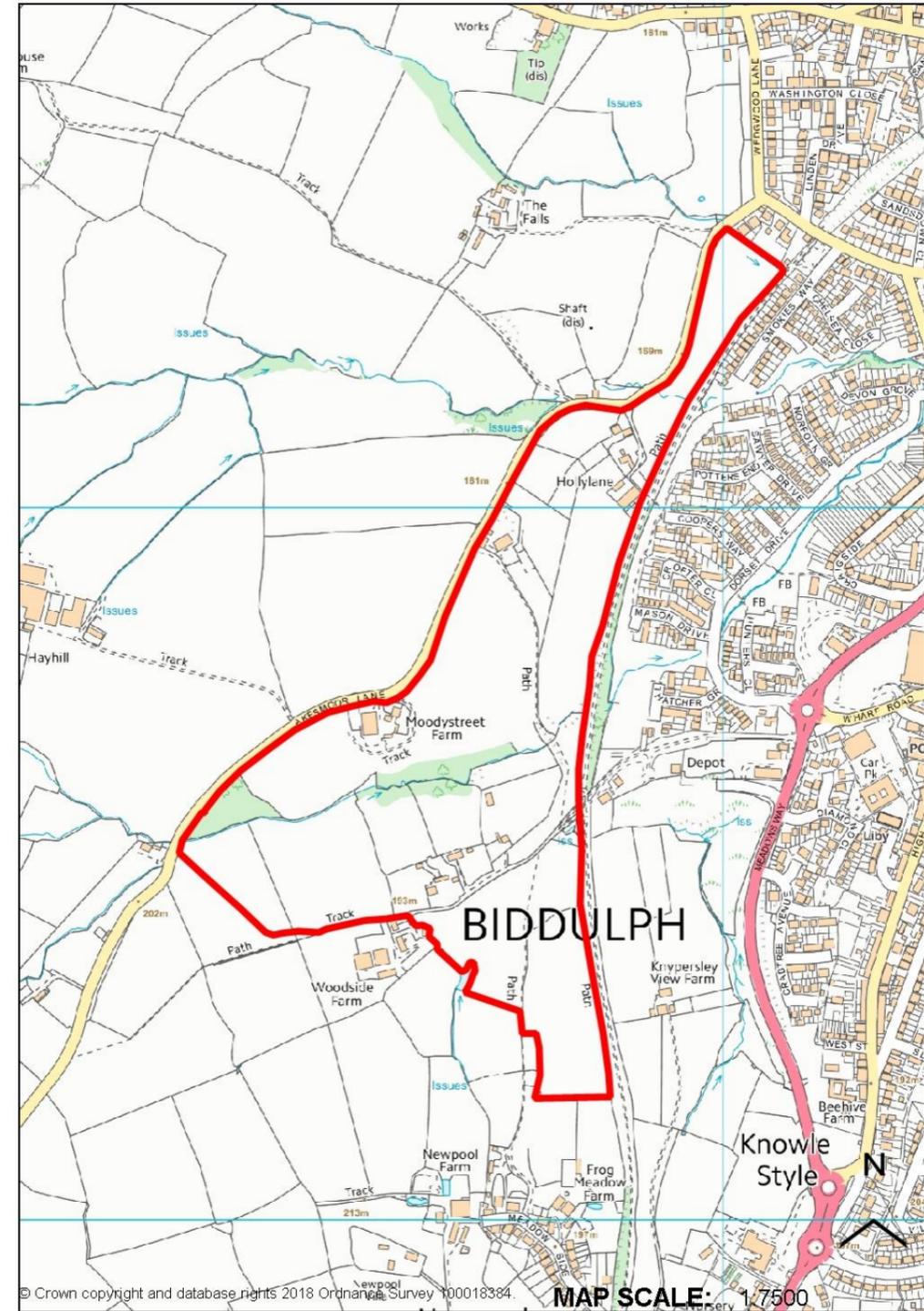
** (NB as safeguarding is a longer term option it is acknowledged that land selected does not have to have a full evidence base in place now as circumstances can change over time e.g. land availability).

*** In order to differentiate between the sites, they have been ranked taking into account known constraints with Rank 1 sites being the most suitable for safeguarding and Rank 3 sites being the least suitable.

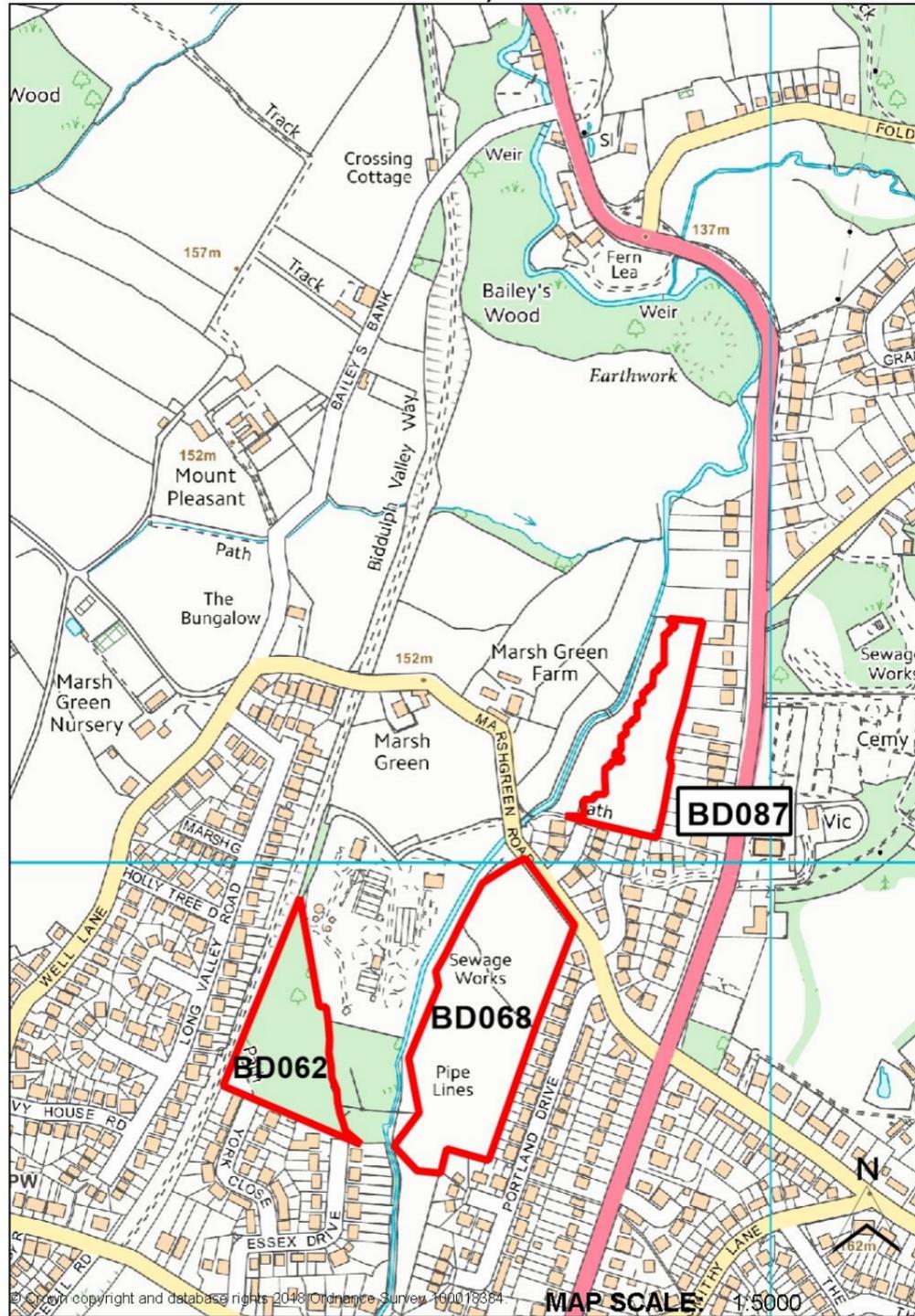
Map A - Area North of Mill Hayes Road, Knypersley



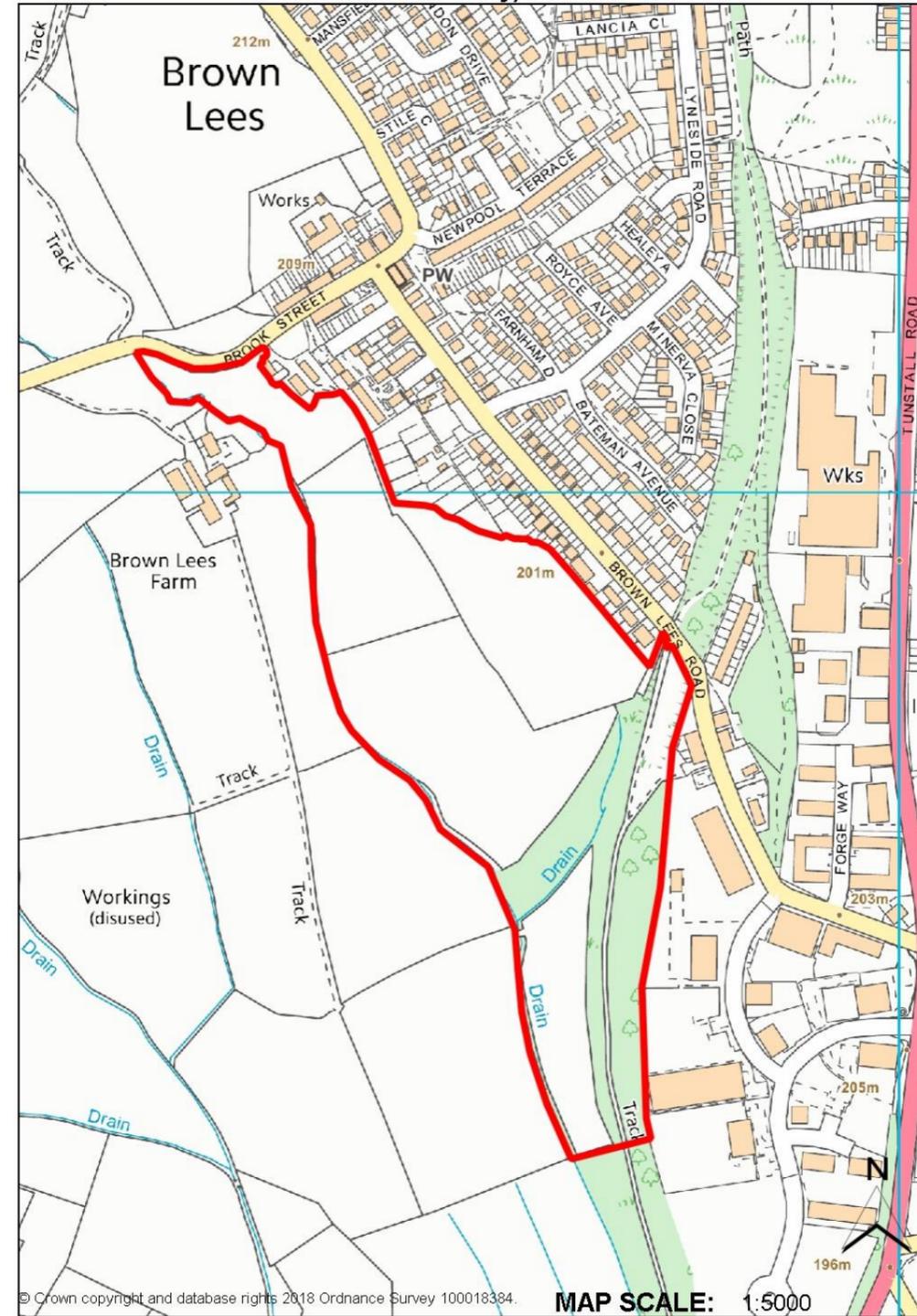
Map B - Area west of BVW (incorporating BDNEW and ADD03)



Map C - Area to the North of Biddulph at Gillow Heath (BD062, BD068 and BD087)



Map D - Area south of Brook Street, west of Brown Lees Road (to district boundary)



Appendix E

Biddulph Options Assessment Table 4 – Allow both targeted and strategic Green Belt release around the town to enable additional site allocations where considered deliverable and identification of further land for safeguarding.

Sustainability Appraisal - Summary of Significant Effects

This option envisages allowing both targeted and strategic Green Belt release around Biddulph to enable additional site allocations where these are considered to be deliverable, alongside the identification of further safeguarded land. Allocating sites known to be available helps provide certainty for meeting medium to long term housing needs whilst safeguarding land will help to meet longer term development needs beyond the plan period. This approach is expected to make a significant contribution to meeting the future housing needs of the community and enable the delivery of a range of housing types and tenures within and beyond the plan period.

This option could deliver development within 500m of a bus stop and with good proximity to the town centre with its range of key services and facilities. This is likely to result in positive effects on: improving access to jobs, services and facilities (which in turn is likely to advance equality of opportunity), helping to safeguard the vitality and viability of the town centre, providing support for walking and cycling and reducing the need to travel by car. This is likely to result in positive effects on the town centre and may help support opportunities for investment in culture and tourism with positive effects on the local economy within and beyond the plan period.

However the proposed strategic location to the south includes a playing field, public footpath and sports grounds; the future of these assets for continuing to provide positive benefits for the health and well-being of the community must be taken into account. Dependent on proposal specific information, there is potential for the cumulative impacts of development to result in harm or loss to the significance of designated heritage assets and their settings (particularly in relation to Knypersley Hall and its landscape park), the disturbance of habitats (and their connectedness) and adverse impact on landscape character. Land to the west of the Biddulph Valley Way in particular is considered to be of high landscape sensitivity and development here may adversely affect the existing settlement edge.

The option has also been assessed as likely to result in further negative effects in relation to mineral resources, geological resources (Knypersley Meltwater channel), air quality and greenhouse gas emissions, neighbourhood quality (residual risk of odour and noise and potential constraints on future investment in key infrastructure at Biddulph waste water treatment works), energy consumption arising from construction and occupation of new developments and increased risk of surface water flooding.

SA Recommendation

Dismiss this option.

Assessment of Areas for Allocation and Safeguarding

Refer back to Biddulph Option 2 (Appendix C) and Biddulph Option 3 (Appendix D) Assessment Tables for specific site / area details, each of which have their own pros and cons. The table below provides a list of pros and cons of this option as a general approach.

Pros of the Approach	Cons of the Approach
<ul style="list-style-type: none"> • Would increase housing supply. 	<ul style="list-style-type: none"> • It is not recommended to take this option forward, primarily because the Council can demonstrate a 5 year housing land supply and specific sites for years 6-10 of the Local Plan upon its adoption without further land allocations in Biddulph to replace BDNEW so new allocations are not required to be compliant with the NPPF. In light of this, any release of Green Belt land requires the demonstration of exceptional circumstances which would be difficult to justify.
<ul style="list-style-type: none"> • Would enable Green Belt boundaries to have a degree of permanence beyond the plan period. 	<ul style="list-style-type: none"> • There are site / area constraints with each option though some are more restrictive than others so site selection would not be straightforward.

IT IS NOT RECOMMENDED TO TAKE THIS OPTION FORWARD

REASON:

This is primarily because the Council can demonstrate a 5 year housing land supply and specific sites for years 6-10 of the Local Plan upon its adoption without further land allocations in Biddulph to replace BDNEW so new allocations are not required to be compliant with the NPPF. In light of this, any release of Green Belt land requires the demonstration of exceptional circumstances which would be difficult to justify.

However, the Inspector's Post Hearing Advice Note states that "...consideration should be given as to whether it would be appropriate to identify areas of 'safeguarded land' in order to meet longer term development needs in Biddulph." After consideration of safeguarding (refer to option 3 assessment table – Appendix D), a further option has been developed (refer to option 5 assessment table – Appendix F) which incorporates safeguarding and increasing densities on non-Green Belt sites.

Option 4 releases more Green Belt than is necessary to meet development requirements. It is more harmful to Green Belt purposes than Option 5 which manages to increase housing land supply (10 years and plan period) and provides permanence beyond the plan period whilst minimising Green Belt release.

Appendix F

Biddulph Options Assessment Table 5 – Increase densities at Wharf Road and Tunstall Road to limit the need for Green Belt release as well as limited safeguarding for a future plan period.

Sustainability Appraisal - Summary of Significant Effects

This option envisages supporting both increased development densities at two allocated sites (Wharf Road and Tunstall Road) alongside limited Green Belt release to the north of Biddulph to enable identification of safeguarded land. Increased development densities on allocated sites will help to meet medium to long term housing needs during the plan period whilst safeguarding land will contribute to meeting longer term development needs beyond the plan period. Whilst this approach is expected to make a contribution to meeting the future housing needs of the community, and enable the delivery of a range of housing types and tenures within and beyond the plan period, limited release is envisaged and the appraisal notes that more widespread release would offer greater certainty with regard to meeting longer term housing needs for the town beyond the plan period.

This option could deliver development within 500m of a bus stop and with good proximity to the town centre with its range of key services and facilities. This is likely to result in positive effects on: improving access to jobs, services and facilities (which in turn is likely to advance equality of opportunity), helping to safeguard the vitality and viability of the town centre, providing support for walking and cycling and reducing the need to travel by car. This is likely to result in positive effects on the town centre and may help support opportunities for investment in culture and tourism with positive effects on the local economy within and beyond the plan period.

Dependent on proposal specific information and the implementation of Local Plan policies, there is potential for the cumulative impacts of development to result in the harm or loss to the significance of designated heritage assets and their settings, the disturbance of habitats (and their connectedness) and adverse impact on landscape character. However the appraisal notes that since this option proposes increasing densities on allocated sites and safeguarding land in an area considered to be of low landscape sensitivity, and where the Council's evidence suggests that development would be unlikely to cause high adverse effects to the settings of heritage assets, the risk of cumulative impacts arising is likely to be more effectively managed than under other options.

The option has also been assessed as likely to result in minor negative effects in relation to mineral resources, air quality and greenhouse gas emissions, neighbourhood quality

(residual risk of odour and noise and potential constraints on future investment in key infrastructure at Biddulph waste water treatment works) energy consumption arising from construction and occupation of new developments and increased risk of surface water flooding.

SA Recommendation

Recommends taking this option forward.

Increasing Densities at Wharf Road and Tunstall Road

In September 2018, as part of its accelerated housing delivery programme, the Council commissioned consultants to develop masterplans for two key allocations in the emerging Local Plan in Biddulph at Wharf Road and Tunstall Road.

As part of the master planning process, the approximate site area as identified in the Local Plan was increased by around 2 hectares in light of more detailed consideration. Market demand was also tested, including suitable densities which could be accommodated on the site. Consequently, the draft masterplans found that more housing could be accommodated on the Wharf Road allocation than originally anticipated.

The preferred options for both sites would yield an additional 129 dwellings in total.

Assessment of Areas for Safeguarding

Refer back to Biddulph Option 3 Assessment Table (Appendix D) for specific area analysis.

The table below provides a list of pros and cons of this option as a general approach.

Pros of the Approach	Cons of the Approach
<ul style="list-style-type: none"> Increasing densities outside the Green Belt minimises the need for Green Belt release. 	<ul style="list-style-type: none"> Limited release of Green Belt is proposed. More widespread release would offer greater certainty with regard to meeting longer term housing needs for the town beyond the plan period.
<ul style="list-style-type: none"> This approach is NPPF compliant with Green Belt safeguarding policy. Would enable Green Belt boundaries to have a degree of permanence beyond the plan period reflecting the Inspector's advice. 	<ul style="list-style-type: none"> Allocating a greater range of sites would enhance the 5 year land supply position and provide more flexibility
<ul style="list-style-type: none"> The sites selected for safeguarding have a limited overall impact on Green Belt purposes, are relatively small in scale and have a lack of other known constraints. 	

IT IS RECOMMENDED THAT THIS IS THE MOST APPROPRIATE OPTION TO TAKE FORWARD

REASONS:

- The Council can demonstrate a 5 year housing land supply and specific sites for years 6-10 of the Local Plan upon its adoption without further land allocations in Biddulph to replace BDNEW so new allocations are not required to be compliant with the NPPF. In light of this, any release of Green Belt land requires the demonstration of exceptional circumstances which would be difficult to justify.
- Throughout the examination process there has been a continued emphasis on protection of the Green Belt. With this in mind it is considered appropriate to firstly explore the possibilities for delivering more houses outside of the Green Belt. The masterplans for Wharf Road and Tunstall Road have now been completed. They have undergone detailed site surveys and market testing and conclude that an additional 129 houses could be accommodated in total on these sites. It is considered that increasing capacity of these sites in the Local Plan to reflect this evidence would be appropriate.
- The Inspector's advice in his Post Hearing Advice Note that "...consideration should be given as to whether it would be appropriate to identify areas of 'safeguarded land' in order to meet longer term development needs in Biddulph" has been followed. Not taking into account the Inspector's advice could mean that he declares the Local Plan 'unsound' in his final report and if this happens the Council would not be able to adopt it.
- The Sustainability Appraisal recommends this option noting that since it proposes increasing densities on allocated sites and safeguarding land in an area considered to be of low landscape sensitivity, and where the Council's evidence suggests that development would be unlikely to cause high adverse effects to the settings of heritage assets, the risk of cumulative impacts arising is likely to be more effectively managed than under other options.
- Appendix D contains the detailed assessment of appropriate parcels of land. The area to the north of Biddulph at Gillow Heath (BD062, BD068 and BD087) is considered to be the most suitable for safeguarding. The reasons for this are the limited overall impact on Green Belt purposes (area only makes a contribution to one of the green belt purposes and a limited contribution to the rest) and the relatively small scale of this area compared with the other safeguarding options so by its very nature future development here would have the lowest impact on the Green Belt. Whilst United Utilities would prefer that development took place elsewhere, they don't

make a formal objection and constraints exist on other alternative sites. Consequently, on planning balance, the limited overall impact on the Green Belt and lack of other constraints gives these sites the highest ranking.

- It should be noted that safeguarding land is not the same as allocating land. The intention is that it is set aside to meet future needs (rather than needs within the plan period like an allocation). There is no guarantee that it will become an allocation though at the time of a Local Plan Review any safeguarded land would be considered first. It may not be needed in certain circumstances, for example - if the Council's OAN decreases in the future, if less development is required in Biddulph, if urban land availability increases or densities increase but it provides a buffer to ensure that Green Belt boundaries around Biddulph do not need to be changed during the next plan period i.e. they have a degree of permanence.

Option 5: Increase densities at Wharf Road and Tunstall Road to limit the need for Green Belt release as well as limited safeguarding for a future plan period

