

Biddulph Town Council



Session 1 – 09.30 Tuesday 4 February 2020

Matter 1 Biddulph – safeguarded land and provision for housing

Biddulph Town Council is grateful for the opportunity to address the Inspector in relation to Main Modifications on the above issues.

The information below is intended to be a guide to the points that will be raised at this Session, in order to highlight the key issues.

Background

Biddulph Town Council has led the development of a Neighbourhood Plan and Neighbourhood Development Order, which are due to be submitted to Staffordshire Moorlands District Council at the beginning of February 2020 for Regulation 16 consultation.

These documents are '**pioneering**' in that very few Groups across the country have completed both projects simultaneously.

The process that has been undertaken in order to create these two documents has been lengthy, but **thorough**. A dedicated Working Group (made up of **local experts**) has worked for over four years to build and gather a comprehensive evidence base, which represents the views and needs of the community. With the support of a planning consultant from Urban Vision, the Group members have used their professional skills and knowledge of the local community to collect data and commission specialist organisations, which helped to develop policies that are both pro-development and will support and enhance features of the town that are most cherished by those that live there.

The Group has engaged with the Local Plan process and fully understands the challenges that have arisen around Green Belt constraints.

Issues

1. Consideration of options for Biddulph, including safeguarded land

- It is not clear when the sites in Gillow Heath were identified for safe-guarding, nor the process to arrive at this decision.
- There has been no liaison with Biddulph Town Council, which is also a statutory planning body.
- The Gillow Heath sites are proposed Local Green Space designations in the Neighbourhood Plan. The sites were identified by the community. The proposed designation follows two rounds of independent consultation.
- Staffordshire Wildlife Trust (SWT) completed mapping exercises within the town to enhance the evidence base. Confirmation was provided by SWT that this information had been made available to Planners in May 2018 (and updated since that date), but this does not appear to have been considered.



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- The safe-guarded sites are being proposed without clear understanding if they are developable. This is at odds with national policy and guidance.
 - There are wider considerations than removal of the land from the Green Belt, such as the impact on wildlife, neighbours, infrastructure concerns and the wider community.
2. *Other potential impacts of sites in Gillow Heath – landscape, highways, flood risk, drainage, odours, biodiversity, infrastructure*
- The proposed additional three safe-guarded sites fail to respond to the policy on flood risk.
 - The Environment Agency made clear that inclusion of BD087 would require a level 2 assessment. This does not appear to be included in the additional evidence base for the main modifications.
 - The removal of any requirement for site-specific flood risks assessments in the main modifications is at odds with national policy and guidance.
 - It is vitally important to draw on current and emerging evidence in relation to development of these sites, particularly around their value as important wildlife corridors.
3. *Proposals for Wharf Road and Tunstall Road*
- The Town Council wrote to SMDC in February 2019:
The emerging Local Plan states that the total housing provision for Biddulph Town will be 890 new units; this is the second largest allocation of the towns. The evidence base from the emerging Neighbourhood Development Order is identifying where existing buildings within the Town Centre can be better utilised to include first floor residential accommodation, which will create new residential dwellings and help to revive the Town Centre.

The draft policies within the plan support sustainable development and growth with supported infrastructure. This evidence base could be used to further support the case of continuing with the emerging Local Plan, removing this one site and through a range of Local and Neighbourhood Plan policies and the Neighbourhood Development Order, encourage development on existing sites identified, increasing the densities to provide accommodation to meet Biddulph's housing need and create new accommodation in the Town Centre in existing buildings.

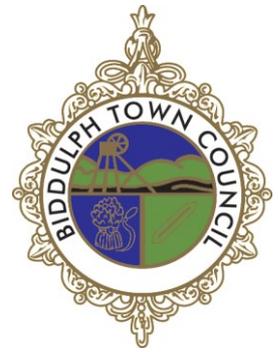
- Biddulph Town Council is keen to ensure that the existing Town Centre remains viable and prospers in the longer term.



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- The Wharf Road Strategic Development Area Concept Masterplan is deeply flawed and fails to provide a clear framework for sustainable development. It fails to respond to the constraints and opportunities of the area. It is not clear how consideration has been made of the impact of potential commercial uses in proximity to residential development. The lack of meaningful and informative consultation with the wider community is problematic and at best poor practice.
 - There was also a lack of liaison with Biddulph Town Council as a statutory planning body, responsible for preparation of the Neighbourhood plan and a Neighbourhood Development Order.
4. *Housing supply in Biddulph*
- The emerging Local Plan (when adopted) will be reviewed within 5 years and this could call for additional sites, if required. It would be more expedient to provide a clear rationale, and proceed with the document; its cumulative impact on numbers throughout the District is minimal.
 - Biddulph Town Council would support an exercise whereby other potential sites in the town are considered for development, which could form part of a five-year review of this document.

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