

## Staffordshire Moorlands Local Plan Examination in Public

### Resumed Hearings 4-5 February 2020

#### Hearing Statement on behalf of Mr Robert Simcock in relation to Biddulph sites BD068 (Land to the West of Portland Drive) and BD087 (Land off Beaumont Close)

##### Matter 1: Morning sessions 4 February 2020

*1.1 Is the overall analysis of options for Biddulph, following the Inspector's Post Hearing Advice, robust?*

1. Not entirely. Whilst the removal of the Gillow Heath sites from the Green Belt is welcomed, SMDC does not propose to then allocate the sites for housing development, electing for them to be developed "beyond the plan period" (new MM12 commentary at page 62) and to continue to rely on a significant proportion of windfall development and increasing the density of several allocated Biddulph sites. This is not a reasonable option to select when the result will be a significant hurdle placed on the sustainable means of addressing what SMDC accepts will be an identified shortfall of housing during the Plan period.

*1.2 Does the evidence base, including the Sustainability Appraisal, Green Belt Reviews and Options Analysis, support the identification of the three sites at Gillow Heath as safeguarded land?*

2. Yes, for the reasons set out in the earlier representations on sites BD068 and BD087. Further, the updated SA chapter "Alternative Development Approaches for Biddulph" confirms at paragraph 3.17 that the Gillow Heath sites are of low landscape sensitivity.

*1.3 Is the conclusion that there will be a limited effect on Green Belt purposes from the Gillow Heath sites justified?*

3. Yes. The Green Belt Review in particular justifies this conclusion as it confirms there will be a limited effect on the Green Belt purposes if these sites were removed from the Green Belt. This is in line with the previous Inspector's conclusions that the Gillow Heath sites should be looked at for Green Belt release.

*2.1 Are there any overriding constraints that are likely to prevent the Gillow Heath sites coming forward to meet any longer-term needs beyond the Plan period?*

4. No. There are no technical restrictions on the delivery of these two sites as all requisite technical reports have been obtained. Flood plain (both sites benefit from Biddulph Brook outfall operate at a lower elevation level, very difficult to present flooding of any kind). One only isolated location (small in area) situated on the West bank of Biddulph Brook, Highways, Environmental, Wildlife addressed to

the satisfaction of those authorities. A topographic report was obtained and disclosed and no issues regarding Arboriculture. SMDC has noted a potential constraint on future investment in key infrastructure but the statutory water and sewerage undertaker (United Utilities) has been consulted and does not object to the development of site BD068 (the closest site to the works) or either of the other two other to-be safeguarded Gillow Heath sites.

*2.2 Should Policy SS6 and MM12 be further modified to make it clear that consideration would need to be given to potential impacts if the sites were brought forward for development in the future?*

5. Because the sites are sustainable, deliverable with no technical constraints, there is a willing landowner now, and they would make an immediate and meaningful contribution to meeting the identified shortfall of housing in Biddulph, (amongst the most sustainable settlements in the entire SMDC area), the sites should be formally allocated for development.

*4.1 Is it necessary to identify sufficient land in Biddulph at this stage to meet the housing needs of the town over the Plan period?*

6. Yes, for the obvious reason that this process represents SMDC's opportunity to properly plan to meet the identified needs of its area in a sustainable way. Whilst the NPPF's position is that latter years of the Plan may be subject to a more flexible approach, there is no reason a shortfall, at whatever point one is predicted during the life of the Plan, should be permitted when there are identified sustainable sites able to contribute to reducing that shortfall.

*4.2 If it is considered necessary to identify sufficient land, how is it to be achieved?*

7. Sites BD068 and BD087 should be allocated.

#### Matter 2: Afternoon Sessions 4 February 2020

*1.3 Is the likely shortfall in supply against the overall requirement justified taking into account paragraph 47 of the Framework?*

8. No. As a point of principle the requirement is to significantly boost the supply of housing applies in all cases, not only when there is a lack of 5YLS or identified shortfall. To plan for a shortfall is a failure to plan at all: that shortfall will have to be made up somehow. SMDC have provided no reasons which justify planning to have a shortfall when there are sustainable sites such as the Gillow Heath sites which would make a meaningful contribution to meeting the area's identified housing needs now, including the provision of much-needed affordable housing and significant community benefits. More recently SMDC enquired if we had further land available to meet the recognized shortfall. Our future development plans/Community projects include an elderly- persons warden- controlled unit,

satellite doctor's surgery unit (part time chiropody) police post and a crecshe. It is worthy of mention, BD 068 AND BD087 WERE THE PREFERRED sites of SMDC for residential development on those Community project proposals. The sites remain Affordable deliverable and sustainable.

