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Biddulph Town Council
Biddulph Town Hall,
High Street
Biddulph ST8 6AR

Our Ref: ALP/Seabridge/BNP/Reg14/1

29 October 2019

Dear Sirs,

**Biddulph Neighbourhood Plan – Regulation 14 Consultation
Representations on behalf of Seabridge Developments Limited**

Introduction

We act on behalf of Mr Seabridge of Seabridge Developments Limited and we are instructed to submit this representation in **OBJECTION** to the above plan and more particularly, to the proposed Local Green Space designation for Site 57 – ‘Gillow Fold Field’.

Question 2 – Vision and Aims

We consider that the Neighbourhood Plan (NP) does not accord with Planning Practice Guidance (PPG), which states:

*“Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and shape the **development and growth** of their local area.”*
(emphasis added). (Paragraph: 001 Reference ID: 41-001-20190509)

It does little to encourage, promote or direct development and growth in Biddulph. Instead, it seems to focus on seeking to create policy constraints that are aimed at frustrating and preventing future development and growth.

Furthermore, the Plan does not fulfil the requirements of the emerging Local Plan Policies SS3 and SS4, as proposed by Main Modifications MM8 and MM9, which state:

"In order to assist in meeting the identified development requirements for the Local Plan, Neighbourhood Plans should maximise the opportunities for housing and employment growth in sustainable locations, and where appropriate, make allocations in their plan for at least the same amount of housing and employment land identified in the Local Plan for the relevant parish or Neighbourhood Area.

Question 4 – Local Green Space Designations

In his Post-Hearings advice to Staffordshire Moorlands District Council in respect of its emerging Local Plan, the Inspector highlighted the high bar set by the NPPF in relation to LGS and has recommended some deletions and also that previous proposals should be reviewed (paragraphs 31-33).

We believe that several of the LGS designations in this NP are not supported by the District Council as the Local Planning Authority.

More specifically, we STRONGLY OBJECT to the proposal to designate our client's privately owned land referred to as Site 57 - Gillow Fold Field as Local Green Space.

The land is within the Main Modifications of the emerging Local Plan with a 'safeguarded land' designation (MM12 Strategic Policy SS6 Biddulph Area Strategy).

We share the view of the Local Planning Authority that:

"this presents a direct conflict with the Local Plan which could only be extinguished by the removal of the LGS designation.

Retaining the LGS designation would mean that the Neighbourhood Plan would conflict with NPPF paragraph 99 which requires the designation of land as Local Green Space to be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. An LGS designation would also be inconsistent with Planning Practice Guidance entitled open space, sports and recreation facilities, public rights of way and local green space Paragraph: 007 (Reference ID: 37-007-20140306), which states that designating any Local Green Space will need to be consistent with local planning for sustainable development in the area. In

particular, plans must identify sufficient land in suitable locations to meet identified development needs and the Local Green Space designation should not be used in a way that undermines this aim of plan-making."

In short, we consider that the NP should not be seeking to prejudice the proposed safeguarded land designation nor frustrate or prevent the future development of our client's land for housing, in conflict with the proposals of emerging Staffordshire Moorlands Local Plan.

Conclusion

We consider that the Neighbourhood Plan is not 'positively prepared' and does not seek to encourage or direct development and growth, but instead, seeks to constrain and prevent such growth by the designation of several 'unsound' areas of Local Green Space such as, **Site 57 – Gillow Fold Field, which we consider must be deleted.**

We request to be added to the consultation database, since we will wish to comment on the Neighbourhood Plan should it be progressed and we reserve the right to appear at any future Hearing to forcefully pursue the above objection, should the need arise.

Yours faithfully,

Andy Williams

A. J Williams Dip TP MRTPI

Director