

My Ref

Your Ref

1 July 2019

Mr Mark Dakeyne
Planning Inspector
c/o Programme Officer
Moorlands House
Leek
Staffordshire
ST13 6HQ

Dear Mr Dakeyne

Re. Main modifications and Green Belt in Biddulph

I refer to your post hearing advice (EL6.004) in which you invited the Council to set out how your concerns regarding the exceptional circumstances for the release of Green Belt in respect of site BDNEW should be addressed. The advice went on to state that in reviewing whether exceptional circumstances exist, 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.

I'm writing to inform you that at a Council Assembly meeting on 26th June, the Council agreed its response to your concerns in respect of the Green Belt in Biddulph for your consideration. The Council proposes main modifications to reflect the following

- Identification of safeguarded land at Gillow Heath (site ref. BD062, BD068 and BD087).

In line with paragraph 85 of the NPPF, the Council would wish to further modify the Local Plan to make it clear that the safeguarded land is not allocated for development at the present time and that planning permission for the permanent development of safeguarded land would only be granted following a Local Plan review which proposes the development.

- Increase the estimated housing capacity at the Tunstall Road Strategic Development Site to 105 and the remainder of the Wharf Road Strategic Development Site to 442 homes along with consequential increases to the housing land supply for the District and Biddulph (a total increase of 129 homes).

Additional housing capacity at both sites has been identified through master-planning commissioned by the Council to support their delivery. A revised housing trajectory to reflect these changes has been prepared. This incorporates an additional 62 homes into the 6-10 year phase with the remainder (all on the Wharf Road site) coming forward later in the plan period. No amendments to the five year housing land supply are proposed as both sites already feature in the trajectory and the rate of their development is not expected to increase.

In coming to this conclusion, the Council considered five broad options, nine options for potential site allocations and four potential safeguarding areas which are set out below. Options were ranked in order of preference based on consideration of constraints and policy. A Sustainability Appraisal of the five broad options was also prepared. The assessment of options was underpinned by the evidence base documents available in the examination library, including the Green Belt Review (SD2.4, 22.6 & 22.7) and the Landscape, Local Green Space, Heritage Impact Study (SD22.5 & 22.8).

Broad Options considered:

- Option 1: Do nothing
- Option 2: Allow targeted Green Belt release around the town to enable additional site allocations where considered deliverable.
- Option 3: Allow strategic Green Belt release around the town to enable identification of safeguarded land.
- 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.
- 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.

Potential housing allocations considered:

- BD062 Land north of York Close & Essex Drive – Rank 1
- BD068 Land west of Portland Drive – Rank 1
- BD087 Land off Beaumont Close – Rank 1
- BD138c Marsh Green Nursery – Rank 4
- BD069 Former Nursery adjoining Knypersley Hall – Rank 2
- BD131b Land off Harlech Drive – Rank 4
- ADD04 Land off Mill Hayes Road – Rank 3
- Part of BD063a Land off Newpool Road – Rank 4

- Newpool Road Caravan Site – Rank 1

Safeguarded areas considered:

- Area North of Mill Hayes Road, Knypersley – Joint Rank 2
- Area west of Biddulph Valley Way (incorporating BDNEW and ADD03) – Rank 3
- Area to the north of Biddulph at Gillow Heath (BD062, BD068 and BD087) – Rank 1
- Area south of Brook Street, west of Brown Lees Road – Joint Rank 2

Having considered the above options, the Council agreed to the preferred approach to housing sites and safeguarding in Biddulph (Option 5) on the basis that:

- Additional housing allocations are not considered to be essential at this stage given that the Council can demonstrate it has sufficient housing supply to provide for 5 years (5.16) and 10 years without replacing site BDNEW with additional sites in the Green Belt. Indeed, housing supply (for 10 years and plan period) can be boosted without any further Green Belt release by maximising capacity on existing allocations. As such, exceptional circumstances were not considered to exist for additional allocations.
- On balance, the principle of the identification of safeguarded land in Biddulph was deemed appropriate in order to provide potential opportunities for development in a future Local Plan review. Biddulph is one of three towns in the District but is the only one which is surrounded entirely by Green Belt. It is likely that some land outside the current town boundary will be necessary in order to support housing growth and the sustainability of Biddulph in the long term.
- Option 5 was also supported by the Sustainability Appraisal

Land at Gillow Heath (BD062, BD068 and BD087) was identified as the preferred location for safeguarding as it:

- Is less harmful to Green Belt purposes when compared with the alternatives
- Suffers from fewer wider planning constraints (e.g. agricultural land classification and access). United Utilities had objected to the site as they identified that the land may be required for a future expansion of the treatment works in the future. This objection was subsequently withdrawn. However, their preference would still be for housing growth in other locations.

- The land is being actively promoted for development and is therefore likely to deliverable when required.

Given the above, it was considered that exceptional circumstances have been demonstrated to release land at Gillow Heath (BD062, BD068 and BD087) for the purposes of safeguarding.

In terms of the wider potential changes to the Local Plan, at the Council Assembly meeting on 26th June, Councillors also agreed to the latest draft schedule of main modifications. This reflects the outcome of our review of Local Green Spaces (LGS) and subsequent feedback from you in terms of their suitability as LGS or open space. Further approval by Councillors will be required should any further substantive modifications be identified as being necessary.

A revised schedule of main modifications and a Housing Implementation Strategy has been prepared to reflect the above changes. The Sustainability Appraisal of the main modifications will be available in August. At your request, this information along with details of the Council's assessment of the options and masterplan details for the Wharf Road and Tunstall Road sites can be submitted for consideration as part of the examination process.

I would welcome your consideration of the above and clarification on the next steps in the examination process and associated timescales. In this regard, I'm mindful that the school holiday season is nearly upon us and our preference would be to avoid any form of consultation that would significantly overlap with this period (23rd July – 30th August). Nevertheless, the Council is very keen expedite the examination process as far as possible.

I look forward to hearing from you. In the meantime, should you require any further clarification, please do not hesitate to contact me.

Yours sincerely,

Dai Larnier
Executive Director – Place
Staffordshire Moorlands District Council