

Alternative Development Approaches for Biddulph - Sustainability
Appraisal report

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Introduction



1 Introduction

Background

1.1 This Sustainability Appraisal Addendum Report has been prepared by Staffordshire Moorlands District Council as part of the integrated Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) of the Staffordshire Moorlands Local Plan. An integrated approach to the SA/SEA has been taken throughout the evolution of the Staffordshire Moorlands Local Plan and the term "Sustainability Appraisal", or its abbreviation "SA", should be taken to refer to "SA incorporating the requirements of SEA".

1.2 The Staffordshire Moorlands Local Plan has been subject to SA throughout its preparation. The table below sets out the principal stages at which SA has been undertaken.

Date	Plan Iteration	Accompanying SA Report
August 2014	Preparation and review of evidence	SA Scoping Report
April 2016	Local Plan: Preferred Options Sites and Boundaries	Interim Sustainability Appraisal report
July 2017	Preferred Options Local Plan	Draft Sustainability Appraisal report
February 2018	Local Plan Submission Version	Sustainability Appraisal Report
June 2018	Submission of Local Plan and schedule of additional modifications	Final Sustainability Appraisal Report
June 2019	Staffordshire Moorlands Local Plan proposed Main Modifications	Initial SA Addendum Report to support consideration of proposed Main Modifications relating to Biddulph (this report)

Table 1.1 SA work undertaken

Local Plan Examination

1.3 The Staffordshire Moorlands Local Plan was submitted to the Secretary of State for Housing, Communities and Local Government on 28th June 2018. The Secretary of State has appointed Mr Mark Dakeyne BA (Hons) MRTPI as Inspector for the Local Plan examination. The examination hearing sessions started on Tuesday 9th October 2018 and these sessions were closed on 23rd October 2018.

1.4 In light of representations received and discussions at the examination hearing sessions, the Inspector has written to the Council (examination library reference EL6.004) to offer post hearing advice relating to main modifications and related matters.

1.5 In his letter to the Council of 11th January 2019, the Inspector set out his view that the evidence base, including the Green Belt Review Studies and the Landscape Assessment, did not justify the release of the BDNEW site to the west of the Biddulph Valley Way, Biddulph.

1.6 The Inspector recommended deletion of BDNEW and advised that consequential amendments would be needed to the Plan, although the detail of the changes would depend on whether other sites are brought forward as alternatives. The Inspector further advised that consideration should be given to identifying areas of 'safeguarded land' in order to meet longer-term development needs in Biddulph.

1.7 The aim of this Report is to present an appraisal of the likely significant effects associated with alternative development approaches for Biddulph, with a view to informing continuing plan preparation.

1.8 Section 3 of the June 2018 SA Report accompanying submission of the Staffordshire Moorlands Local Plan describes in detail the methodology and approach used throughout the SA process. Section 4 of the June 2018 SA Report sets out the SA Framework and to ensure consistency, this Framework continues to form the basis for the SA work on the emerging Local Plan.

1.9 As an SA Report Addendum, this report should be read alongside the full SA Report submitted with the Staffordshire Moorlands Local Plan.

Selection of alternatives



2 Selection of alternatives

Selection of alternatives for appraisal - February 2019

2.1 In addressing the Inspector's post hearing advice in relation to the future development needs of Biddulph, a number of reasonable alternative approaches were considered. These were:

- 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.

2.2 The Council's evidence base on Green Belt is provided by a Green Belt review undertaken by Amec Foster Wheeler in November 2015, with additional sites assessed in September 2016 and April 2017. A map of sites in Biddulph considered suitable for release from the Green Belt under exceptional circumstances is provided as map 5.1 in Section 5 of this report.

2.3 Further maps are provided in Section 5 to illustrate sites and strategic areas identified in the options below.

2.4 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.

2.5 Option 2: Allow targeted Green Belt release around the town to enable additional site allocations where considered deliverable proposes to allocate omission sites as follows (map 5.1):

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)

2.6 Option 3: Allow strategic Green Belt release around the town to enable identification of safeguarded land proposes to identify the following areas as safeguarded land:

- Area to the north of Biddulph at Gillow Heath (BD062, BD068 and BD087) (map 5.4).
- Area north of Mill Hayes Road (Knypersley) (map 5.2).
- Area south of Brook Street, west of Brown Lees Road (to district boundary) (map 5.5).
- Area west of Biddulph Valley Way (BD140 incorporating BDNEW and ADD03) (map 5.3).

2.7 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 proposes to allocate omission sites 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)

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

- Area north of Mill Hayes Road (Knypersley) - excluding allocated sites at part 2 above.
- Area south of Brook Street, west of Brown Lees Road (to district boundary).
- Area west of Biddulph Valley Way (BD140 incorporating BDNEW and ADD03).

Further Option considered - May 2019

2.9 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 (map 5.6).

2.10 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.

Summary of findings



3 Summary of findings

February 2019

3.1 The full SA appraisal matrices recording the detail of the appraisal of each of the options are provided in section 4. The summary of findings is set out below.

Option 1 - Summary of significant effects

3.2 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.

3.3 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.

Option 2 - Summary of significant effects

3.4 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 (assuming a continuation of the current housing requirement by area). 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.

3.5 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.

3.6 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.

Option 3 - Summary of significant effects

3.7 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.

3.8 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.

3.9 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.

3.10 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.

Option 4 - Summary of significant effects

3.11 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.

3.12 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.

3.13 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.

3.14 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.

Recommended preferred option and options dismissed

Options dismissed - March 2019

Options proposed for dismissal	Rationale
Option 1:	The option could be expected to:

Options proposed for dismissal	Rationale
Do nothing	<ul style="list-style-type: none"> • Maintain a ten year supply of sites to help meet the short and medium term housing need of the town and District. • Offer protection for the landscape setting of the town and its natural assets including biodiversity and green infrastructure. • Offer protection for the existing settlement edge. • Offer protection for best and most versatile agricultural land, mineral safeguarded areas and geological resources. • Offer protection for heritage assets and their settings. • Support opportunities for future investment in key infrastructure (Biddulph Waste Water Treatment Works). <p>However a failure to plan for the long term housing needs of Biddulph at this stage in the plan making process risks:</p> <ul style="list-style-type: none"> • Failing to meet the long term housing needs of the whole community. • Constraining investment in the town centre and local economy. <p>The option would not help ensure that Green Belt boundaries can endure in the long term; nor addresses how the longer-term development needs of Biddulph and its environs could be met.</p>
Option 2: Allow targeted Green Belt release around the town to enable additional site allocations where considered deliverable	<p>The option could be expected to:</p> <ul style="list-style-type: none"> • Make a significant contribution to meeting the housing needs of the whole community during the plan period. • Provide certainty that long term housing needs can be met by allocating sites that are known to be currently available. • Allow choice and flexibility for the market by enabling the allocation of a range of sites. • Offer protection for the existing settlement edge at the Biddulph Valley Way to the west of the town. <p>However (dependent on proposal specific information and the implementation of Local Plan policies) the cumulative impacts of development could result in:</p> <ul style="list-style-type: none"> • Harm or loss to the significance of designated heritage assets. • Negative impact on the landscape setting of the town and its natural assets including biodiversity and green infrastructure.

Options proposed for dismissal	Rationale
	<ul style="list-style-type: none"> • Negative impact on neighbourhood quality from the residual risk of odour, noise and a potential constraint on future investment in key infrastructure. • An increase in the risk of flooding. <p>The option would not help ensure that Green Belt boundaries can endure in the long term; nor addresses how the longer term development needs of Biddulph and its environs could be met.</p>
<p>Option 3 Allow strategic Green Belt release around the town to enable identification of safeguarded land</p>	<p>The option could be expected to:</p> <ul style="list-style-type: none"> • Maintain a ten year supply of sites to help meet the short and medium term housing need of the town and District. • Make a significant contribution to meeting the longer term housing needs of the whole community, beyond the plan period. <p>However failure to identify additional sites for allocation risks that:</p> <ul style="list-style-type: none"> • Long term housing needs cannot be met during the plan period. • Sufficient suitable, available and deliverable sites within the safeguarded areas may not be identified to meet longer term needs beyond the plan period. <p>In addition (dependent on proposal specific information and the implementation of Local Plan policies) the cumulative impacts of longer term development beyond the plan period could result in:</p> <ul style="list-style-type: none"> • Harm or loss to the significance of designated heritage assets. • Negative impact on the landscape setting of the town and its natural assets including biodiversity and green infrastructure. • Adverse effect on the existing settlement edge at the Biddulph Valley Way to the west of the town. • Negative impact on community assets providing opportunities for recreation, health and well-being. • Negative impact on best and most versatile agricultural land, mineral safeguarded areas and geological resources. • Negative impact on neighbourhood quality from the residual risk of odour, noise and a potential constraint on future investment in key infrastructure. • An increase in the risk of flooding. <p>The option helps to ensure that Green Belt boundaries can endure in the long term, but may fail to address how the development needs of Biddulph and its environs could be met towards the end of the plan period.</p>
<p>Option 4</p>	<p>The option could be expected to:</p>

Options proposed for dismissal	Rationale
<p>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.</p>	<ul style="list-style-type: none"> • Make a significant contribution to meeting the housing needs of the whole community during the plan period. • Provide certainty that long term housing needs can be met by allocating sites that are known to be currently available. • Allow choice and flexibility for the market by enabling the allocation of a range of sites. • Make a significant contribution to meeting the longer term housing needs of the whole community, beyond the plan period. <p>In addition (dependent on proposal specific information and the implementation of Local Plan policies) the cumulative impacts of development could result in:</p> <ul style="list-style-type: none"> • Harm or loss to the significance of designated heritage assets. • Negative impact on the landscape setting of the town and its natural assets including biodiversity and green infrastructure. • Adverse effect on the existing settlement edge at the Biddulph Valley Way to the west of the town. • Negative impact on community assets providing opportunities for recreation, health and well-being. • Negative impact on best and most versatile agricultural land, mineral safeguarded areas and geological resources. • Negative impact on neighbourhood quality from the residual risk of odour, noise and a potential constraint on future investment in key infrastructure. • An increase in the risk of flooding. <p>The option helps to ensure that Green Belt boundaries can endure in the long term and addresses how the longer-term development needs of Biddulph and its environs could be met.</p>

Table 3.1 Development approach options dismissed following appraisal

Option 5 - Summary of Significant effects

3.15 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.

3.16 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.

3.17 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.

3.18 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.

Option recommended to take forward

Option recommended to take forward	Rationale
<p>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.</p>	<p>The option could be expected to:</p> <ul style="list-style-type: none"> • Boost the supply of new homes during the plan period to help meet the housing need of the town and District. • Provide some certainty around meeting longer term needs beyond the plan period through safeguarding land. • Provide safeguarded land constituting available and deliverable sites that minimises risk of under delivery in the long term. <p>However identification of limited land for safeguarding provides for around two years supply beyond the plan period (assuming continuation of current plan proposals for Biddulph's share of a housing requirement) - limiting the contribution made by the option to addressing how housing need for the town can be met beyond the plan period.</p> <p>In addition (dependent on proposal specific information and the implementation of Local Plan policies) the cumulative impacts of development beyond the plan period could result in:</p>

Option recommended to take forward	Rationale
	<ul style="list-style-type: none"> • Harm or loss to the significance of designated heritage assets (although the Council's evidence suggests that development would be unlikely to cause high adverse effects to the settings of heritage assets). • Negative impact on the landscape setting of the town and its natural assets including biodiversity and green infrastructure (although the Council's evidence suggests that sites are of low landscape sensitivity). • Negative impact on mineral safeguarded areas. • Negative impact on neighbourhood quality from the residual risk of odour, noise and a potential constraint on future investment in key infrastructure. • An increase in the risk of flooding. <p>The option would make a contribution to the endurance of Green Belt boundaries in the long term and addresses how the development needs of Biddulph and its environs could be met towards the end of the plan period.</p>

Table 3.2 Development approach option recommended to be taken forward

Appraisal matrices



4 Appraisal matrices

4.1 The matrices below set out the likely significant effects on sustainability of the five alternative options considered by the Council for a development approach for Biddulph. The assessments are based on the methodology proposed and consulted on in the SA Scoping Report and use the SA Framework also developed through consultation as part of the SA Scoping stage.

4.2 As part of the SA appraisal of options, consideration has been given to effects on sustainability over time (in the short, medium and long term) along with any cumulative impacts of implementing each option and possible mitigation measures where appropriate.

4.3 In comparing options with one another, consideration has also been given to the geographical scale of effect, whether any identified effects would be permanent or temporary, reversible or irreversible and the assumptions made, or justification for the assessment recorded.

4.4 The options appraised are described in section 2 of this report. The methodology used for the appraisal is set out in full in section 3 of the sustainability appraisal report of the submission Local Plan (June 2018).

4.5 Definitions of significance are provided in Section 3 (Appraisal Methodology) of the June 2018 SA report (Table 3.5).

Option 1: Do nothing

Option 1: Do nothing		Justification; cumulative effects / mitigation measures		
SA Objective	Decision making criteria	Nature of effect; Comments		
		Time-frame		
		ST	MT	LT
SOCIAL				
1. To improve community cohesion and the quality of where people work and live.	<ul style="list-style-type: none"> Will it make a positive contribution towards community cohesion? Will it improve neighbourhood quality? Will it ensure that there is adequate open space and support Green Infrastructure? Will it minimise light and noise pollution? Will it ensure that occupiers of buildings and spaces have sufficient natural light and appropriate levels of privacy? 	0/i	0/i	0/i
				<p>The "do nothing" approach would not result in identification of any additional land for development or safeguarding at this stage in the plan making process. This would not affect delivery of planned growth in the short to medium term. Overall the assessment against this objective is considered to be neutral but uncertain as it will be partly dependent on the implementation of Local Plan policies.</p> <p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: Community cohesion and local environmental quality are dependent on the design and tenure mix, as well as the location of new development. Assuming continuation of the current housing requirement by area (20% of 320 for Biddulph) this option provides a supply of 9.9 years for Biddulph. Delivery would be monitored as part of a Local Plan review. Mitigation measures: Local Plan policies to ensure that good standards of amenity and open space and Green Infrastructure are delivered as part of new housing development.</p>
2. To advance equality of opportunity between all persons and eliminate social exclusion by	<ul style="list-style-type: none"> Will it remove or minimise any disadvantages suffered by people due to their age, disability, gender reassignment, marriage / civil partnership, 	+	+/-	-
				<p>The "do nothing" approach would not lead to identification of additional land for development or safeguarding. Whilst delivery of planned growth in the short to medium term would not be affected, it may mean that the needs of some members of the community may not be</p> <p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: Equality of opportunity for all persons will be improved by any measure that has the effect of improving overall accessibility to jobs, services and</p>

Option 1: Do nothing						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
improving access to jobs, services and facilities.	<p>pregnancy / maternity, race, religion / belief, sex and sexual orientation?</p> <ul style="list-style-type: none"> Will it help to minimise the distance people need to travel to access education, employment, shopping and other key services and facilities. 				addressed in the long term. This is likely to result in short term positive effects on improving access to jobs, services and facilities but negative effects in the longer term which may fail to contribute to the advancement of equality of opportunity.	<p>facilities. Mitigation measures: Local Plan policies to help ensure that the needs of all members of the community can be addressed by helping to minimise the distance people need to travel to access education, employment, shopping and other key services and facilities.</p>
3. To improve health and reduce health inequalities.	<ul style="list-style-type: none"> Will it improve health or access to health facilities? Will it promote healthy lifestyles? Will it reduce health inequalities? Will it provide opportunities to participate in leisure and recreational activities including access to the countryside? 	+	+/?	-/?	<p>This option would enable the delivery of planned growth in the short to medium term in proximity to a range of healthcare facilities (eg within 1,200m from a GP surgery and open space). However failure to identify land to meet the long term future needs of the town at this stage in the plan making process may result in long term health problems for people forced to remain in unsuitable accommodation. Overall this option has been assessed as having a negative effect on this objective in the long term, although the exact effects are uncertain.</p>	<p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: Delivering new homes in proximity to existing healthcare services and open space will have a positive effect on health. Failure to plan to meet the long term housing need for the town risks a negative effect on health and well-being. Mitigation measures: Local Plan policies to ensure that new developments deliver opportunities to increase take up of sustainable transport choices and improvements to healthy travel networks, including increased opportunities for access to the countryside.</p>

Option 1: Do nothing					Justification; cumulative effects / mitigation measures
SA Objective	Decision making criteria	Time-frame			
		ST	MT	LT	
4. To minimise opportunities for crime and reduce the fear of crime.	<ul style="list-style-type: none"> Will it reduce actual levels of crime? Will it reduce fear of crime? 	?	?	?	<p>There is uncertainty as to the nature of effect and level of significance as this will be dependent on the implementation of Local Plan policies.</p> <p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: Good design will help minimise opportunities for crime and reduce the fear of crime. Mitigation measures: Local Plan policies to ensure that new developments are well designed, creating safe places and reducing opportunities for anti-social behaviour.</p>
5. To ensure adequate quality and provision of a range of house types to meet local needs in appropriate locations and including affordable / social /extra care housing.	<ul style="list-style-type: none"> Will it provide an appropriate mix of housing to enable all needs to be met? Will it enable people to meet their needs within their existing communities? Will it ensure that people can afford their housing? 	+	+/-	--	<p>Whilst delivering planned growth in the short to medium term will help to meet need, failure to offer greater certainty and plan more comprehensively for the future housing needs of the town via identifying additional allocations and/or safeguarded land at this stage in the plan making process risks failure to meet local housing need in the longer term. It also risks leading to a failure to deliver the appropriate range of types and tenures to meet the needs of the whole community. This option has been assessed as having a significant negative effect on this objective in the long term.</p> <p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: Further Green Belt release is required to meet the long term housing need of Biddulph and to deliver a range of types and tenures of new homes. Mitigation measures: Wider initiatives of the Council should be supported to help deliver additional affordable homes.</p>

Option 1: Do nothing					Justification; cumulative effects / mitigation measures
SA Objective	Decision making criteria	Time-frame			
		ST	MT	LT	
6. To strengthen links between rural areas and towns by sustainable forms of transport and reduce the number of journeys made by car.	<ul style="list-style-type: none"> Will it minimise impacts on existing traffic congestion? Will it support the use of public transport? Will it support safe walking and cycling? Will it protect and improve access to the natural environment and support Green Infrastructure? 	+	+	++	<p>Delivering planned growth in the short to medium term could be expected to support the use of walking and cycling through good design and location of development. Not identifying additional allocations and/or safeguarded land around the town at this stage in the plan making process may lead to fewer car journeys in the long term than under other options. Overall this option has been assessed as having a long term positive effect on this objective.</p> <p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: Restricting opportunities for long term development will help to reduce the number of journeys made by car. Mitigation measures: Local Plan policies to ensure that developments support safe walking and cycling and improve access to the natural environment.</p>
ENVIRONMENTAL					
7. To minimise contributions to climate change and consider climate change adaptation.	<ul style="list-style-type: none"> Will it reduce emissions of greenhouse gases particularly CO₂? Will it increase energy efficiency? Will it increase the use of renewable energy? Will it ensure new development is in accessible locations in order to reduce the need for car use and / or encourage sustainable forms of transport? 	-	-	-	<p>Delivering planned growth in the short to medium term could lead to an increase in greenhouse gas emissions and energy consumption during both construction and occupation. Not identifying additional allocations and/or safeguarded land at this stage in the plan making process may lead overall to a lower quantum of development and fewer car journeys in the long term than under other options. Overall this option has been assessed as having a negative effect on this objective.</p> <p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: Even if individual properties are built to high environmental performance standards and delivered in sustainable locations, the total increase in number of dwellings and car journeys is likely to increase energy use and associated greenhouse gas emissions. Mitigation measures: Local Plan policies to ensure that high environmental design standards are supported and that developments are brought forward in</p>

Option 1: Do nothing					Justification; cumulative effects / mitigation measures
SA Objective	Decision making criteria	Time-frame			
		ST	MT	LT	
8. To improve air quality.	<ul style="list-style-type: none"> Will it minimise emissions of airborne pollutants? Will it maximise the removal of air pollutants (e.g. by trees)? 	-	-	-	<p>accessible locations that support the use of sustainable forms of transport.</p> <p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: The main areas identified in the District as being of poor air quality are the Cellarhead junction (between the A52 and A520) and Leek town centre. ⁽¹⁾ Any increase in the number of dwellings and car journeys across Biddulph is likely to increase emission of airborne pollutants. There is a risk that air quality may deteriorate in areas of existing low quality. Mitigation measures: Local Plan policies to ensure that developments are set back from busy roads, include appropriate landscaping to aid removal of air pollutants and provide support for the Biddulph Local Transport Strategy ⁽²⁾.</p>
9. To reduce flood risk, protect and enhance water sources.	<ul style="list-style-type: none"> Is new development directed towards areas of least flood risk? 	0	0	0	<p>Monitoring of air quality in Biddulph indicates that nitrogen dioxide concentrations have shown no clear trend towards improvement or deterioration since 2014. The A527 town centre bypass avoids traffic movements between Congleton and Stoke-on-Trent having to pass through Biddulph town centre and this is generally considered to help maintain air quality. Not identifying additional allocations and/or safeguarded land around the town may lead to a lower quantum of development overall in the long term, helping to minimise adverse impacts on air quality arising from construction and use of dwellings including associated car journeys. However any development will contribute to emissions to air. Overall this option has been assessed as having a negative effect on this objective.</p> <p>This option is not likely to result in the development of sites subject to risk from flooding. Development of planned growth in the short to medium term</p> <p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: Development will be permitted only</p>

Option 1: Do nothing					Justification; cumulative effects / mitigation measures
SA Objective	Decision making criteria	Time-frame			
		ST	MT	LT	
	<ul style="list-style-type: none"> Will it reduce risk of flooding eg by encouraging the integration of mitigation measures such as SuDS into new development? Will it protect, maintain and improve the quality of water resources and help contribute to the objectives of the Water Framework Directive? Will it encourage water efficiency and demand management? 				<p>where schemes meet development plan requirements for management of flood risk. Mitigation measures: Local Plan policies to ensure that new developments are directed towards areas of least flood risk and incorporate SuDS wherever possible.</p>
10. To identify, conserve and enhance biodiversity resources and to test the plan's policies and proposals on European Sites and SSSIs	<ul style="list-style-type: none"> Will it protect and promote effective management of the district's sites of ecological and nature conservation importance? Will it help contribute to Staffordshire Biodiversity Action Plan objectives? Will it help deliver networks of biodiversity 	0	0	+	<p>could be expected to lead to an increase in wastewater and reduction of natural drainage. Mitigation measures are possible however. Overall this option has been assessed as having a neutral effect on this objective.</p> <p>Delivering planned growth in the short to medium term without identifying additional land for allocation or safeguarding at this stage in the plan making process may minimise the long term potential for development to result in disturbance of habitats or disruption of green infrastructure including ecological networks. The HRA screening exercise did not identify any LSEs in relation to the draft site allocations in Biddulph (no pathway) ⁽³⁾. Overall this</p> <p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: Policies in the Local Plan will provide protection for biodiversity and for sites of ecological and nature conservation importance. Mitigation measures: Local Plan policies to ensure impacts on biodiversity are minimised and proposals provide net gains in biodiversity where possible.</p>

Option 1: Do nothing					Justification; cumulative effects / mitigation measures	
SA Objective	Decision making criteria	Time-frame				Nature of effect; Comments
		ST	MT	LT		
	and green infrastructure?				option has been assessed as having a neutral effect on this objective, with positive effects for the long term.	
11. To safeguard the best and most versatile agricultural land; improve soil and land resources; and protect and enhance geological resources.	<ul style="list-style-type: none"> Will it safeguard the best and most versatile agricultural land? Will it minimise the loss of greenfield land? Will it reduce land contamination / instability? Will it reduce the amount of derelict land? Will it protect notable geological and geomorphological features? 	+	+	++	<p>Sites around the settlement boundary of Biddulph are in the main land indicated on the predictive map of Best and Most Versatile agricultural land as within an area where 20 - 60% of the land is likely to be BMV, so no further allocations for development or safeguarding is likely to result in protection of best and most versatile agricultural land. It is also likely to help avoid the loss of mineral resources through protecting sites that are assessed as being within Mineral Safeguarding Areas or Coal authority development high risk area.</p>	<p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: Additional allocations for development or safeguarding will be greenfield sites on the edge of settlement. Mitigation measures: Local Plan policies to ensure protection and enhancement of geologically important sites.</p>
12. To minimise the use of non-renewable resources.	<ul style="list-style-type: none"> Will it reduce waste generation? Will it maximise the re-use of existing buildings? Will it increase the use of building materials from sustainable sources? 	?	?	?	<p>There is uncertainty as to the nature of effect and level of significance as this will be dependent on the implementation of Local Plan policies.</p>	<p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: Policies in the Local Plan will encourage the re-use of existing buildings wherever possible. Mitigation measures: Local Plan policies to support waste minimisation.</p>

Option 1: Do nothing					Justification; cumulative effects / mitigation measures
SA Objective	Decision making criteria	Time-frame			
		ST	MT	LT	
13. To protect and enhance the character of towns / villages and other heritage and archaeological assets along with their settings.	<ul style="list-style-type: none"> Will it ensure the continued protection and enhancement of cultural and historic heritage assets (designated and non-designated assets) along with their settings? Will it protect and reinforce the character and appearance of the district's towns and villages and maintain and strengthen local distinctiveness and sense of place? 	0/i	0/i	+/i	<p>By identifying no further land for allocation or safeguarding at this stage in the plan making process, this option minimises the risk of delivering development in the proximity of heritage assets in comparison to other options. Overall this option has been assessed as having a neutral effect on this objective in the short and medium term and a positive effect in the long term, although the exact nature of effects are uncertain as they are dependent on proposal specific information.</p> <p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: Policies in the Local Plan will provide protection for heritage and archaeological assets along with their settings. Mitigation measures: Local Plan policies to support protection and enhancement for the character of towns / villages; heritage and archaeological assets along with their settings.</p>
14. To protect and enhance the character and appearance of the landscape including historic landscape and other natural assets and resources.	<ul style="list-style-type: none"> Will it protect and enhance the character of the landscape and maintain and strengthen local distinctiveness? Will it promote development on brownfield land? Will it safeguard protected sites and provide opportunities 	0/i	0/i	+/i	<p>By delivering planned growth in the short and medium terms and identifying no further land for allocation or safeguarding for the longer term, this option may help protect the landscape setting of the town and its natural assets in comparison with other options. Overall this option has been assessed as having a neutral effect on this objective in the short term and a positive effect in the long term, although the exact nature of effects are uncertain as</p> <p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: Policies in the Local Plan will provide protection for landscape character and natural assets. Mitigation measures: Local Plan policies to support protection and enhancement of the character and appearance of the landscape including historic landscape and other natural assets and resources.</p>

Option 1: Do nothing					Justification; cumulative effects / mitigation measures
SA Objective	Decision making criteria	Time-frame			
		ST	MT	LT	
	for the enhancement of the natural environment identified in the NCA profiles?				they are dependent on proposal specific information.
15. To encourage further development of sustainable tourism, cultural heritage and local distinctiveness.	<ul style="list-style-type: none"> Will it support the development of a vibrant cultural economy and local distinctiveness? Does it help support tourism and the visitor economy? 	+	-	--	<p>Failure to plan for the long term housing needs of the town at this stage in the plan making process may result in long term negative impacts on the housing market and may restrict opportunities for investment in culture and tourism leading to potential for negative effects on the local economy. Overall this option has been assessed as having an negative effect on this objective in the long term.</p> <p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: An under supply of housing can impair labour mobility resulting in businesses finding it difficult to recruit and retain staff. Proposals that have a positive effect on the town centre are likely to result in support for tourism and the visitor economy. Mitigation measures: Local Plan policies to support tourism and the visitor economy.</p>
ECONOMIC					
16. To safeguard the vitality and viability of the District's towns and villages, and create and sustain a vibrant rural economy	<ul style="list-style-type: none"> Will it safeguard shops and services in existing centres? Will it safeguard and improve the retail, leisure and service provision? 	+	-	--	<p>Delivery of planned growth in the short and medium term but failure to plan for the long term housing needs of the town at this stage in the plan making process may result in long term negative impacts on the town centre and demand for the range of services and facilities that can be found here. Overall the proposal has</p> <p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: Development of residential sites with good access to the town centre is likely to result in a positive effect on the vitality and viability of Biddulph as residents of new developments could be expected to support their local</p>

Option 1: Do nothing					Justification; cumulative effects / mitigation measures
SA Objective	Decision making criteria	Time-frame			
		ST	MT	LT	
17. To strengthen, modernise and diversify the District economy, and promote sustainable economic growth	<ul style="list-style-type: none"> Will it provide a balanced portfolio of employment land in sustainable locations? Will it provide opportunities for the creation of new businesses and/or minimise the loss or displacement of existing businesses? 	+	-	--	<p>been assessed as having a negative effect on this objective in the long term.</p> <p>Failure to allocate additional sites for development or safeguarding at this stage in the plan making process may result in lost opportunities to encourage investment in people and infrastructure through developer contributions. This proposal has been assessed as having a negative effect on this objective in the long term.</p> <p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: A local labour supply will help to deliver economic growth across the town and wider plan area. Mitigation measures: Local Plan policies to support sustainable economic growth.</p>
18. To encourage and support a high and stable level of employment	<ul style="list-style-type: none"> Will it meet the employment needs of local people? Will it increase economic activity levels? Will it improve physical accessibility to jobs? Will it support higher income levels for local residents? 	+	-	--	<p>The do nothing option is less likely to facilitate residential development within 30 minutes travel time of existing employment provision in the long term. This option has been assessed as having a negative effect on this objective in the long term.</p> <p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: Ensuring a sufficient supply of homes within easy access of employment is a central element of an efficiently functioning economy. Mitigation measures: Local Plan policies to support sustainable economic growth.</p>
Summary of significant effects:					

SA Objective	Option 1: Do nothing				Justification; cumulative effects / mitigation measures	
	Decision making criteria	Time-frame				Nature of effect; Comments
		ST	MT	LT		
	<p>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.</p>					

Table 4.1 Appraisal of Option 1

1. 2017 Air Quality Annual Status Report In fulfillment of Part IV of the Environment Act 1995 Local Air Quality Management; SMDC; June 2018
2. Staffordshire Moorlands District Integrated Transport Strategy 2018-2031; Staffordshire County Council; October 2018
3. Staffordshire Moorlands Local Plan Habitat Regulations Assessment submission version; February 2018

Option 2: Targeted Green Belt release to enable additional site allocations

SA Objective	Option 2: Targeted Green Belt release to enable further site allocations				Justification; cumulative effects / mitigation measures	
	Decision making criteria	Time-frame				Nature of effect; Comments
		ST	MT	LT		
	SOCIAL					

Option 2: Targeted Green Belt release to enable further site allocations						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
1. To improve community cohesion and the quality of where people work and live.	<ul style="list-style-type: none"> Will it make a positive contribution towards community cohesion? Will it improve neighbourhood quality? Will it ensure that there is adequate open space and support Green Infrastructure? Will it minimise light and noise pollution? Will it ensure that occupiers of buildings and spaces have sufficient natural light and appropriate levels of privacy? 	+/-	+/-	-/?	<p>Allocation of omission sites at Gillow Heath to the north, Knypersley to the south and Newport to the west may enable the enhancement of existing community facilities and services and this is likely to result in positive effects on this objective. However many of these locations form part of the ecological network associated with the BVW and this is likely to result in a negative effect arising from the potential for adverse impacts on the District's GI network. Further negative effects on neighbourhood quality and local infrastructure may result from delivery of new homes in close proximity to the Biddulph waste water treatment works where United Utilities has warned of a residual risk of odour and noise as well as potential impact on future expansion options⁽¹⁾. Overall the assessment against this objective is considered to be mixed and uncertain, as in addition it will be partly dependent on the implementation of Local Plan policies.</p>	<p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: Community cohesion and local environmental quality are dependent on the design and tenure mix, as well as the location of new development. Mitigation measures: Local Plan policies to ensure that good standards of amenity and open space and Green Infrastructure are delivered as part of new housing development.</p>
2. To advance equality of opportunity	<ul style="list-style-type: none"> Will it remove or minimise any disadvantages 	+	+	++	<p>This option could enable the long term delivery of new development in good proximity to a wide range of town</p>	<p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made:</p>

Option 2: Targeted Green Belt release to enable further site allocations						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
between all persons and eliminate social exclusion by improving access to jobs, services and facilities.	<p>suffered by people due to their age, disability, gender reassignment, marriage / civil partnership, pregnancy / maternity, race, religion / belief, sex and sexual orientation?</p> <ul style="list-style-type: none"> Will it help to minimise the distance people need to travel to access education, employment, shopping and other key services and facilities. 				<p>centre services and facilities. This is likely to result in very positive effects on improving access to jobs, services and facilities which could be expected to contribute to the advancement of equality of opportunity in the long term.</p>	<p>Equality of opportunity for all persons will be improved by any measure that has the effect of improving overall accessibility to jobs, services and facilities. Mitigation measures: Local Plan policies to help ensure that the needs of all members of the community can be addressed by helping to minimise the distance people need to travel to access education, employment, shopping and other key services and facilities.</p>
3. To improve health and reduce health inequalities.	<ul style="list-style-type: none"> Will it improve health or access to health facilities? Will it promote healthy lifestyles? Will it reduce health inequalities? Will it provide opportunities to participate in leisure and recreational activities including 	+	+	++	<p>This option could enable the long term delivery of new development in proximity to a range of healthcare facilities (eg within 1,200m from a GP surgery and open space). Development on the edge of settlement and close to the BVW may offer opportunities to enable improved recreational access to the countryside. Overall this option has been assessed as having a significant positive effect on this objective in the long term.</p>	<p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: Delivering new homes in proximity to existing healthcare services and open space will have a positive effect on health. Mitigation measures: Local Plan policies to ensure that new developments deliver opportunities to increase take up of sustainable transport choices and improvements to healthy travel networks, including</p>

Option 2: Targeted Green Belt release to enable further site allocations						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
	access to the countryside?					increased opportunities for access to the countryside.
4. To minimise opportunities for crime and reduce the fear of crime.	<ul style="list-style-type: none"> Will it reduce actual levels of crime? Will it reduce fear of crime? 	?	?	?	There is uncertainty as to the nature of effect and level of significance as this will be dependent on the implementation of Local Plan policies.	<p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: Good design will help minimise opportunities for crime and reduce the fear of crime. Mitigation measures: Local Plan policies to ensure that new developments are well designed, creating safe places and reducing opportunities for anti-social behaviour.</p>
5. To ensure adequate quality and provision of a range of house types to meet local needs in appropriate locations and including affordable / social /extra care housing.	<ul style="list-style-type: none"> Will it provide an appropriate mix of housing to enable all needs to be met? Will it enable people to meet their needs within their existing communities? Will it ensure that people can afford their housing? 	+	+	++	Targeted Green Belt release around the town to enable allocation of deliverable omission sites may be expected to yield around 500 new homes in the long term. This could be expected to support the delivery of a range of types and tenures, making a significant contribution to meeting the needs of the whole community. Overall this option has been assessed as having a major positive effect on this objective in the long term.	<p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: Whilst delivery would be monitored as part of a Local Plan review - assuming continuation of the current housing requirement by area (20% of 320dpa for Biddulph) - Biddulph's requirement may be considered to be 63dpa. An additional 500 homes would represent around 8 years supply. Allocation of omission sites known to be available and deliverable helps to provide long term certainty of supply and a wide range of sites allows choice and flexibility in the market, offering</p>

Option 2: Targeted Green Belt release to enable further site allocations					
SA Objective	Decision making criteria			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
	ST	MT	LT		
					potential to meet the long term housing needs of the town and deliver a range of types and tenures of new homes in the long term. Mitigation measures: Wider initiatives of the Council should be supported to help deliver additional affordable homes.
6. To strengthen links between rural areas and towns by sustainable forms of transport and reduce the number of journeys made by car.	<ul style="list-style-type: none"> Will it minimise impacts on existing traffic congestion? Will it support the use of public transport? Will it support safe walking and cycling? Will it protect and improve access to the natural environment and support Green Infrastructure? 	+	++	Targeted Green Belt release is expected to deliver new development largely within 500m of a bus stop and this is likely to result in a positive effect from supporting the use of public transport. Future development could also be expected to be in proximity to a range of town centre services and facilities, helping to support the use of walking and cycling. Overall this option has been assessed as having a long term positive effect on this objective.	<p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: Development delivered close to public transport, a bus stop, and existing services and facilities will help to reduce the number of journeys made by car. Mitigation measures: Local Plan policies to ensure that developments support safe walking and cycling and improve access to the natural environment.</p>
ENVIRONMENTAL					
7. To minimise contributions to climate change and consider climate change adaptation.	<ul style="list-style-type: none"> Will it reduce emissions of greenhouse gases particularly CO₂? Will it increase energy efficiency? 	-	--	Enabling allocation of additional sites could lead to an increase in greenhouse gas emissions and energy consumption during both construction and occupation. However any development is likely to be within 500m of a bus stop and have good proximity	<p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: Even if individual properties are built to high environmental performance standards and delivered in sustainable locations, the total increase in number</p>

Option 2: Targeted Green Belt release to enable further site allocations						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
	<ul style="list-style-type: none"> Will it increase the use of renewable energy? Will it ensure new development is in accessible locations in order to reduce the need for car use and / or encourage sustainable forms of transport? 				to the town centre with its range of services and facilities, helping to support the use of walking and cycling. Whilst this may help to reduce the need to travel by car, overall this option has been assessed as having a negative effect on this objective.	of dwellings and car journeys is likely to increase energy use and associated greenhouse gas emissions. Mitigation measures: Local Plan policies to ensure that high environmental design standards are supported and that developments are brought forward in accessible locations that support the use of sustainable forms of transport.
8. To improve air quality.	<ul style="list-style-type: none"> Will it minimise emissions of airborne pollutants? Will it maximise the removal of air pollutants (e.g. by trees)? 	-	-	--	Monitoring of air quality in Biddulph indicates that nitrogen dioxide concentrations have shown no clear trend towards improvement or deterioration since 2014. The A527 town centre bypass avoids traffic movements between Congleton and Stoke-on-Trent having to pass through Biddulph town centre and this is generally considered to help maintain air quality. Targeted Green Belt release is likely to bring forward additional development in the long term, with some associated adverse impacts on air quality arising from construction, use of dwellings, and additional car journeys. Overall this option has been assessed as having a negative effect	<p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: The main areas identified in the District as being of poor air quality are the Cellarhead junction (between the A52 and A520) and Leek town centre⁽²⁾. An increase in number of dwellings and car journeys across Biddulph is likely to increase emission of airborne pollutants. There is a risk that air quality may deteriorate in areas of existing low quality. Mitigation measures: Local Plan policies to ensure that developments are set back from busy roads, include appropriate landscaping to aid removal of air</p>

Option 2: Targeted Green Belt release to enable further site allocations						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
9. To reduce flood risk, protect and enhance water sources.	<ul style="list-style-type: none"> Is new development directed towards areas of least flood risk? Will it reduce risk of flooding eg by encouraging the integration of mitigation measures such as SuDS into new development? Will it protect, maintain and improve the quality of water resources and help contribute to the objectives of the Water Framework Directive? Will it encourage water efficiency and demand management? 	-	-	--	<p>on this objective, particularly in the long term.</p> <p>Targeted Green Belt would enable additional site allocations, including land potentially at risk from flooding from Biddulph Brook. Any future development could be expected to lead to an increase in wastewater and reduction of natural drainage. Mitigation measures are possible however. Overall this option has been assessed as having a significant negative effect on this objective in the long term.</p>	<p>pollutants, and provide support for the Biddulph Local Transport Strategy⁽³⁾.</p> <p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: Development will be permitted only where schemes meet development plan requirements for management of flood risk. Mitigation measures: Local Plan policies to ensure that new developments are directed towards areas of least flood risk and incorporate SuDS wherever possible.</p>
10. To identify, conserve and enhance	<ul style="list-style-type: none"> Will it protect and promote effective management of the 	-	-	--	<p>There is potential for future development from additional site allocations to result in the disturbance</p>	<p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made:</p>

Option 2: Targeted Green Belt release to enable further site allocations						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
biodiversity resources and to test the plan's policies and proposals on European Sites and SSSIs	<ul style="list-style-type: none"> district's sites of ecological and nature conservation importance? Will it help contribute to Staffordshire Biodiversity Action Plan objectives? Will it help deliver networks of biodiversity and green infrastructure? 				of habitats or species. The omission sites are all considered to have good connectivity to other biodiverse habitats. (4) The HRA screening exercise did not identify any LSEs in relation to the draft site allocations in Biddulph (no pathway) (5). Overall this option has been assessed as having a significant negative effect on this objective in the long term.	Policies in the Local Plan will provide protection for biodiversity and for sites of ecological and nature conservation importance, however the cumulative impact of development on an ecological network could pose risks of disturbance that would require suitable mitigation. Mitigation measures: Local Plan policies to ensure impacts on biodiversity are minimised, the integrity of ecological networks are protected and proposals provide net gains in biodiversity where possible.
11. To safeguard the best and most versatile agricultural land; improve soil and land resources; and protect and enhance geological resources.	<ul style="list-style-type: none"> Will it safeguard the best and most versatile agricultural land? Will it minimise the loss of greenfield land? Will it reduce land contamination / instability? Will it reduce the amount of derelict land? Will it protect notable geological and 	+	+	+/-	Targeted Green Belt may enable the future development of land indicated on the predictive map of Best and Most Versatile agricultural land as largely within an area considered urban / industrial (with a small area only where 20 - 60% of the land is likely to be BMV) so the option is likely to result in protection of best and most versatile agricultural land. However omission sites also include land lying within the Coal Authority development high risk area and mineral safeguarding area for superficial sand and gravel. Overall this option has been assessed as	<p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: The proposal could avoid the loss of agricultural land including the best and most versatile. Mitigation measures: Local Plan policies to ensure protection and enhancement of geologically important sites. Also Plan policies to avoid where possible non-mineral development taking place in Minerals Safeguarding Areas and the unnecessary sterilisation of minerals.</p>

Option 2: Targeted Green Belt release to enable further site allocations						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
	geomorphological features?				having a mixed effect on this objective in the long term.	
12. To minimise the use of non-renewable resources.	<ul style="list-style-type: none"> Will it reduce waste generation? Will it maximise the re-use of existing buildings? Will it increase the use of building materials from sustainable sources? 	?	?	?	There is uncertainty as to the nature of effect and level of significance as this will be dependent on the implementation of Local Plan policies.	<p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: Policies in the Local Plan will encourage the re-use of existing buildings wherever possible. Mitigation measures: Local Plan policies to support waste minimisation.</p>
13. To protect and enhance the character of towns /villages and other heritage and archaeological assets along with their settings.	<ul style="list-style-type: none"> Will it ensure the continued protection and enhancement of cultural and historic heritage assets (designated and non-designated assets) along with their settings? Will it protect and reinforce the character and appearance of the district's towns and villages and maintain and strengthen local distinctiveness and sense of place? 	-	-	--/?	Targeted release of Green Belt in the north could lead to future development within 400m of Biddulph Grange Conservation Area and other heritage assets including grade II* listed, the Church of St. Lawrence and Coffin Lids and Benches and grade 2 Gillowfold Farmhouse. Targeted release to the south could lead to development within 400m of Grade II* listed Knypersley Hall, its landscape park and other heritage assets. Dependent on proposal specific information, there is scope that this option could lead to the deterioration of the setting of designated heritage assets. This option has been assessed as having	<p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: Policies in the Local Plan will provide protection for heritage and archaeological assets along with their settings. However the cumulative impact of development in proximity to designated heritage assets increases the risk of harm or loss of significance. Mitigation measures: Local Plan policies to support protection and enhancement for the character of towns / villages; heritage and archaeological assets along with their settings.</p>

Option 2: Targeted Green Belt release to enable further site allocations						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
14. To protect and enhance the character and appearance of the landscape including historic landscape and other natural assets and resources.	<ul style="list-style-type: none"> Will it protect and enhance the character of the landscape and maintain and strengthen local distinctiveness? Will it promote development on brownfield land? Will it safeguard protected sites and provide opportunities for the enhancement of the natural environment identified in the NCA profiles? 	-	-	--/?	<p>an overall negative effect on this objective although the exact nature of effects are uncertain.</p> <p>This option proposes Green Belt release of sites considered to be of low landscape sensitivity (in the north) but areas of high and medium sensitivity in the south⁽⁶⁾. However there remains potential for effects on landscape character if developed in the long term, although the exact nature of effects are uncertain as they are dependent on proposal specific information. Omission sites may have potential for release from the Green Belt under exceptional circumstances without damaging Green Belt purposes⁽⁷⁾. Overall this option has been assessed as having a negative effect on this objective although the exact effects are uncertain.</p>	<p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: Policies in the Local Plan will provide protection for landscape character and natural assets. However the cumulative impact of development risks resulting in an adverse effect on the character of landscapes, including historic landscapes. Mitigation measures: Local Plan policies to support protection and enhancement of the character and appearance of the landscape including historic landscape and other natural assets and resources.</p>
15. To encourage further development of sustainable	<ul style="list-style-type: none"> Will it support the development of a vibrant cultural 	0	0	0	<p>This option envisages targeted Green Belt release at developable sites around the town. Enabling residential use of such sites in the long term limits</p>	<p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: Proposals that have a positive effect</p>

Option 2: Targeted Green Belt release to enable further site allocations						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
tourism, cultural heritage and local distinctiveness.	<ul style="list-style-type: none"> economy and local distinctiveness? Does it help support tourism and the visitor economy? 				the effect on opportunities for investment in culture and tourism. However any long term increase in population could result in positive effects on the local economy. Overall this option has been assessed as having a neutral effect on this objective.	on the prosperity of the town centre are likely to result in support for tourism and the visitor economy in the long term. Mitigation measures: Local Plan policies to support tourism and the visitor economy.
ECONOMIC						
16. To safeguard the vitality and viability of the District's towns and villages, and create and sustain a vibrant rural economy	<ul style="list-style-type: none"> Will it safeguard shops and services in existing centres? Will it safeguard and improve the retail, leisure and service provision? 	+	+	+	The targeted release of Green Belt could lead to residential development that is in god proximity of the town centre and the range of key services and facilities that can be found here. Overall the proposal has been assessed as having a minor positive effect on this objective.	Geographical scale: Biddulph; Effects: Permanent; Assumptions made: Development of residential sites with good access to the town centre is likely to result in a positive effect on the vitality and viability of Biddulph as residents of new developments could be expected to support their local retail, leisure and service provision. Mitigation measures: Local Plan policies to support town and village centres.
17. To strengthen, modernise and diversify the	<ul style="list-style-type: none"> Will it provide a balanced portfolio of 	0	0	0	Any residential development arising from targeted Green Belt release could encourage investment in people and	Geographical scale: Biddulph; Effects: Permanent; Assumptions made: A

Option 2: Targeted Green Belt release to enable further site allocations						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
District economy, and promote sustainable economic growth	<ul style="list-style-type: none"> employment land in sustainable locations? Will it provide opportunities for the creation of new businesses and/or minimise the loss or displacement of existing businesses? 				infrastructure through developer contributions although this would be limited. This proposal has been assessed as having a neutral effect on this objective.	local labour supply will help to deliver economic growth across the plan area. Mitigation measures: Local Plan policies to support sustainable economic growth.
18. To encourage and support a high and stable level of employment	<ul style="list-style-type: none"> Will it meet the employment needs of local people? Will it increase economic activity levels? Will it improve physical accessibility to jobs? Will it support higher income levels for local residents? 	+	+	+	The proposal could in the long term facilitate residential development within 30 minutes travel time of existing employment provision. This proposal has been assessed as having a positive effect on this objective.	<p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: Ensuring a sufficient supply of homes within easy access of employment is a central element of an efficiently functioning economy. Mitigation measures: Local Plan policies to support sustainable economic growth.</p>
<p>Summary of significant effects:</p> <p>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 (assuming a continuation of the current housing requirement by area). 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</p>						

Option 2: Targeted Green Belt release to enable further site allocations					
SA Objective	Decision making criteria			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
	ST	MT	LT		
					<p>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 (risk of odour and noise and constraints on potential future investment in key infrastructure) and energy consumption arising from construction and occupation of new developments.</p>

Table 4.2 Appraisal of Option 2

1. Letters to the Council dated 4th March 2019 and 31st May 2019
2. 2017 Air Quality Annual Status Report In fulfilment of Part IV of the Environment Act 1995 Local Air Quality Management; SMDC; June 2018
3. Staffordshire Moorlands District Integrated Transport Strategy 2018 -2031; Staffordshire County Council; October 2018
4. Extended phase 1 Habitat Surveys and Local Wildlife Site Assessments; SMDC; Ecus Ltd; August 2017
5. Staffordshire Moorlands Local Plan Habitat Regulations Assessment submission version; February 2018
6. Landscape, Local Green Space and Heritage Impact Study; SMDC; Wardell Armstrong; August 2016
7. Green Belt Review Study; SMDC; Amec Foster Wheeler; November 2015

Option 3: Strategic Green Belt release to enable safeguarding

Option 3: Strategic Green Belt release to enable safeguarding					Justification; cumulative effects / mitigation measures
SA Objective	Decision making criteria	Time-frame			
		ST	MT	LT	
SOCIAL					
1. To improve community cohesion and the quality of where people work and live.	<ul style="list-style-type: none"> Will it make a positive contribution towards community cohesion? Will it improve neighbourhood quality? Will it ensure that there is adequate open space and support Green Infrastructure? Will it minimise light and noise pollution? Will it ensure that occupiers of buildings and spaces have sufficient natural light and appropriate levels of privacy? 	0	0	+/-	<p>Strategic Green Belt release may enable development beyond the plan period to come forward on sites in the Gillow Heath area, north of Mill Hayes Road and west of the Biddulph Valley Way. This may enable the enhancement of existing community facilities and services and this is likely to result in positive effects on this objective. However these locations can be considered to form part of the ecological network associated with the BVW and this is likely to result in a negative effect arising from the potential for adverse impacts on the District's GI network. Further negative effects on neighbourhood quality and local infrastructure may result from long term delivery of new homes in close proximity to the Biddulph waste water treatment works where United Utilities has warned of a residual risk of odour and noise as well as potential impact on future expansion options⁽¹⁾. Overall the assessment against this objective is considered to be mixed and uncertain as</p> <p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: Community cohesion and local environmental quality are dependent on the design and tenure mix, as well as the location of new development. Mitigation measures: Local Plan policies to ensure that good standards of amenity and open space and Green Infrastructure are delivered as part of new housing development.</p>

Option 3: Strategic Green Belt release to enable safeguarding					Justification; cumulative effects / mitigation measures	
SA Objective	Decision making criteria	Time-frame				Nature of effect; Comments
		ST	MT	LT		
2. To advance equality of opportunity between all persons and eliminate social exclusion by improving access to jobs, services and facilities.	<ul style="list-style-type: none"> Will it remove or minimise any disadvantages suffered by people due to their age, disability, gender reassignment, marriage / civil partnership, pregnancy / maternity, race, religion / belief, sex and sexual orientation? Will it help to minimise the distance people need to travel to access education, employment, shopping and other key services and facilities. 	0	0	++	<p>in addition it will be partly dependent on the implementation of Local Plan policies.</p> <p>Beyond the plan period this option could enable the longer term delivery of new development in good proximity to a range of services and facilities (within 1,200m of the town centre). This is likely to result in very positive effects on improving access to jobs, services and facilities which could be expected to contribute to the advancement of equality of opportunity.</p>	<p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: Equality of opportunity for all persons will be improved by any measure that has the effect of improving overall accessibility to jobs, services and facilities. Mitigation measures: Local Plan policies to help ensure that the needs of all members of the community can be addressed by helping to minimise the distance people need to travel to access education, employment, shopping and other key services and facilities.</p>
3. To improve health and reduce health inequalities.	<ul style="list-style-type: none"> Will it improve health or access to health facilities? 	0	0	-/i	<p>Beyond the plan period this option could enable the longer term delivery of new development in proximity to a range of healthcare facilities (eg within 1,200m</p>	<p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: Delivering new homes in proximity to</p>

Option 3: Strategic Green Belt release to enable safeguarding						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
	<ul style="list-style-type: none"> Will it promote healthy lifestyles? Will it reduce health inequalities? Will it provide opportunities to participate in leisure and recreational activities including access to the countryside? 				<p>from a GP surgery and open space). Development on the edge of settlement and close to the BVW may offer opportunities to enable improved recreational access to the countryside. However the area north of Mill Hayes Road includes a playing field, public footpath and sports grounds. Any loss of these facilities is likely to result in significant negative effects. Overall this option has been assessed as having an uncertain effect on this objective in the long term as it is dependent on implementation.</p>	<p>existing healthcare services and open space will have a positive effect on health. Any loss of sport and recreation assets would need to be compensated for. Mitigation measures: Local Plan policies to ensure that new developments deliver opportunities to increase take up of sustainable transport choices and improvements to healthy travel networks, including increased opportunities for access to the countryside.</p>
4. To minimise opportunities for crime and reduce the fear of crime.	<ul style="list-style-type: none"> Will it reduce actual levels of crime? Will it reduce fear of crime? 	0	0	?	<p>There is uncertainty as to the nature of effect and level of significance as this will be dependent on the implementation of Local Plan policies.</p>	<p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: Good design will help minimise opportunities for crime and reduce the fear of crime. Mitigation measures: Local Plan policies to ensure that new developments are well designed, creating safe places and reducing opportunities for anti-social behaviour.</p>
5. To ensure adequate quality and provision of a	<ul style="list-style-type: none"> Will it provide an appropriate mix of 	0	0	++	<p>Strategic Green Belt release to enable identification of safeguarded land may be expected to yield around 1,500 homes</p>	<p>Geographical scale: Biddulph; Effects: Permanent; Assumptions</p>

Option 3: Strategic Green Belt release to enable safeguarding						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
range of house types to meet local needs in appropriate locations and including affordable / social /extra care housing.	<ul style="list-style-type: none"> housing to enable all needs to be met? Will it enable people to meet their needs within their existing communities? Will it ensure that people can afford their housing? 				<p>in the longer term, beyond the plan period. This is likely to enable the longer term delivery of a range of types and tenures, contributing to meeting the future needs of the whole community beyond the plan period. However safeguarding land without additional site allocations may require a Local Plan review to ensure that housing supply is sufficient to meet identified need towards the end of the plan period. Overall this option has been assessed as having a significant positive effect on this objective in the longer term, beyond the plan period.</p>	<p>made: Whilst delivery would be monitored as part of a Local Plan review - assuming continuation of the current housing requirement by area (20% of 320dpa for Biddulph) - Biddulph's requirement may be considered to be 63dpa. Larger areas of Green Belt release offer the most potential to meet the long term housing needs of the town and deliver a range of types and tenures of new homes in the long term. Safeguarding land will help to meet longer term development needs beyond the plan period. Mitigation measures: Wider initiatives of the Council should be supported to help deliver additional affordable homes.</p>
6. To strengthen links between rural areas and towns by sustainable forms of transport and reduce the number of journeys made by car.	<ul style="list-style-type: none"> Will it minimise impacts on existing traffic congestion? Will it support the use of public transport? Will it support safe walking and cycling? Will it protect and improve access to the natural 	0	0	+	<p>Strategic Green Belt release could deliver longer term development (beyond the plan period) within 500m of a bus stop and this is likely to result in a positive effect from supporting the use of public transport. Future development could be expected to be within 1,200m of a range of services and facilities, helping to support the use of walking and cycling. Overall this option has been</p>	<p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: Development delivered close to public transport, a bus stop, and existing services and facilities will help to reduce the number of journeys made by car. Mitigation measures: Local Plan policies to ensure that developments support safe walking</p>

Option 3: Strategic Green Belt release to enable safeguarding						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
	environment and support Green Infrastructure?				assessed as having a long term positive effect on this objective, beyond the plan period.	and cycling and improve access to the natural environment.
ENVIRONMENTAL						
7. To minimise contributions to climate change and consider climate change adaptation.	<ul style="list-style-type: none"> Will it reduce emissions of greenhouse gases particularly CO₂? Will it increase energy efficiency? Will it increase the use of renewable energy? Will it ensure new development is in accessible locations in order to reduce the need for car use and / or encourage sustainable forms of transport? 	0	0	-	Enabling future development of sites could lead to an increase in greenhouse gas emissions and energy consumption during both construction and occupation. However any development is likely to be within 500m of a bus stop and within 1,200m of the town centre with its range of services and facilities, helping to support the use of walking and cycling. Whilst this may help to reduce the need to travel by car, overall this option has been assessed as having a long term negative effect on this objective, with effects arising beyond the plan period.	<p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: Even if individual properties are built to high environmental performance standards and delivered in sustainable locations, the total increase in number of dwellings and car journeys is likely to increase energy use and associated greenhouse gas emissions. Mitigation measures: Local Plan policies to ensure that high environmental design standards are supported and that developments are brought forward in accessible locations that support the use of sustainable forms of transport.</p>
8. To improve air quality.	<ul style="list-style-type: none"> Will it minimise emissions of airborne pollutants? Will it maximise the removal of air 	0	0	-	Monitoring of air quality in Biddulph indicates that nitrogen dioxide concentrations have shown no clear trend towards improvement or	<p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: The main areas identified in the District as being of poor air quality</p>

Option 3: Strategic Green Belt release to enable safeguarding						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
	pollutants (e.g. by trees)?				deterioration since 2014. The A527 town centre bypass avoids traffic movement between Congleton and Stoke-on-Trent having to pass through Biddulph town centre and this is generally considered to help maintain air quality. Strategic Green Belt release is likely to enable further development beyond the plan period, with some associated adverse impacts on air quality arising from construction, use of dwellings, and additional car journeys. Overall this option has been assessed as having a negative effect on this objective in the long term, beyond the plan period.	are the Cellarhead junction (between the A52 and A520) and Leek town centre ⁽²⁾ . An increase in number of dwellings and car journeys across Biddulph is likely to increase emission of airborne pollutants. There is a risk that air quality may deteriorate in areas of existing low quality. Mitigation measures: Local Plan policies to ensure that developments are set back from busy roads, include appropriate landscaping to aid removal of air pollutants, and provide support for the Biddulph Local Transport Strategy ⁽³⁾ .
9. To reduce flood risk, protect and enhance water sources.	<ul style="list-style-type: none"> Is new development directed towards areas of least flood risk? Will it reduce risk of flooding eg by encouraging the integration of mitigation measures such as SuDS into new development? 	0	0	-	Strategic release of Green Belt may provide safeguarded land in an area at risk of flooding from Biddulph Brook (to the north) and where surface water flooding has been recorded (to the south). Any future development (beyond the plan period) could be expected to lead to an increase in wastewater and reduction of natural drainage. Mitigation measures are possible however. Overall this option has been assessed as having a negative effect on this objective in the	<p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: Development will be permitted only where schemes meet development plan requirements for management of flood risk. Mitigation measures: Local Plan policies to ensure that new developments are directed towards areas of least flood risk and incorporate SuDS wherever possible.</p>

Option 3: Strategic Green Belt release to enable safeguarding						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
	<ul style="list-style-type: none"> Will it protect, maintain and improve the quality of water resources and help contribute to the objectives of the Water Framework Directive? Will it encourage water efficiency and demand management? 				long term. Effects arise beyond the plan period.	
10. To identify, conserve and enhance biodiversity resources and to test the plan's policies and proposals on European Sites and SSSIs	<ul style="list-style-type: none"> Will it protect and promote effective management of the district's sites of ecological and nature conservation importance? Will it help contribute to Staffordshire Biodiversity Action Plan objectives? Will it help deliver networks of biodiversity and green infrastructure? 	0	0	--	The option would include release of Green Belt within 500m of the Local Wildlife Site at Greenway Bank Country Park. There is potential for future development (beyond the plan period) to result in the disturbance of habitats or species. The strategic areas are considered to have good connectivity to the wider countryside (4) The HRA screening exercise did not identify any LSEs in relation to the draft site allocations in Biddulph (no pathway) (5). Overall this option has been assessed as having a significant negative effect on this objective in the longer term. Effects arise beyond the plan period.	<p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: Policies in the Local Plan will provide protection for biodiversity and for sites of ecological and nature conservation importance, however the cumulative impact of development on an ecological network could pose risks of disturbance that would require suitable mitigation. Mitigation measures: Local Plan policies to ensure impacts on biodiversity are minimised, the integrity of ecological networks are protected and proposals provide net gains in biodiversity where possible.</p>

Option 3: Strategic Green Belt release to enable safeguarding						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
11. To safeguard the best and most versatile agricultural land; improve soil and land resources; and protect and enhance geological resources.	<ul style="list-style-type: none"> Will it safeguard the best and most versatile agricultural land? Will it minimise the loss of greenfield land? Will it reduce land contamination / instability? Will it reduce the amount of derelict land? Will it protect notable geological and geomorphological features? 	0	0	-	<p>Strategic release of Green Belt is likely to enable the future development of land predominantly indicated on the predictive map of Best and Most Versatile agricultural land as an area considered urban / industrial, but also (largely to the west) partly within areas where less than 20%, and 20 - 60% of the land is likely to be BMV. The option is likely to result in only partial protection of best and most versatile agricultural land. Part of the area proposed as suitable for safeguarding also lies within the mineral safeguarding area for superficial sand and gravel and within the Coal Authority development high risk area. The area also includes the Regionally Important Geological Site Knypersley Meltwater channel which runs alongside the Knypersley Fishing Pool. Overall this option has been assessed as having a negative effect on this objective in the long term. Effects would arise beyond the plan period.</p>	<p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: The proposal could partially avoid the loss of agricultural land including the best and most versatile. Consultation with the Coal Authority would be required. Mitigation measures: Local Plan policies to ensure protection and enhancement of geologically important sites. Also Plan policies to avoid where possible non-mineral development taking place in Minerals Safeguarding Areas and the unnecessary sterilisation of minerals.</p>
12. To minimise the use of non-renewable resources.	<ul style="list-style-type: none"> Will it reduce waste generation? 	0	0	?	<p>There is uncertainty as to the nature of effect and level of significance as this will be dependent on the implementation of Local Plan policies.</p>	<p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: Policies in the Local Plan will</p>

Option 3: Strategic Green Belt release to enable safeguarding						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
	<ul style="list-style-type: none"> Will it maximise the re-use of existing buildings? Will it increase the use of building materials from sustainable sources? 					encourage the re-use of existing buildings wherever possible. Mitigation measures: Local Plan policies to support waste minimisation.
13. To protect and enhance the character of towns / villages and other heritage and archaeological assets along with their settings.	<ul style="list-style-type: none"> Will it ensure the continued protection and enhancement of cultural and historic heritage assets (designated and non-designated assets) along with their settings? Will it protect and reinforce the character and appearance of the district's towns and villages and maintain and strengthen local distinctiveness and sense of place? 	0	0	--/?	Strategic release of Green Belt for safeguarding could lead to future development within 400m of Grade II* listed Knypersley Hall, its landscape park and other heritage assets to the south, within 400m of a number of grade II listed assets including Whitehouse Cottage, Holly Lane to the west and within 500m of Biddulph Grange Conservation Area and other heritage assets to the north. Dependent on proposal specific information, there is scope that this option could lead to the deterioration of the setting of designated heritage assets in the longer term. This option has been assessed as having an overall negative effect on this objective although the exact nature of effects are uncertain and would arise beyond the plan period.	<p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: Policies in the Local Plan will provide protection for heritage and archaeological assets along with their settings. However the cumulative impact of development in proximity to designated heritage assets increases the risk of harm or loss of significance. Mitigation measures: Local Plan policies to support protection and enhancement for the character of towns / villages; heritage and archaeological assets along with their settings.</p>
14. To protect and enhance the	<ul style="list-style-type: none"> Will it protect and enhance the 	0	0	--/?	Strategic locations for Green Belt release are considered to include areas of low	<p>Geographical scale: Biddulph; Effects:</p>

Option 3: Strategic Green Belt release to enable safeguarding						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
character and appearance of the landscape including historic landscape and other natural assets and resources.	character of the landscape and maintain and strengthen local distinctiveness? ● Will it promote development on brownfield land? ● Will it safeguard protected sites and provide opportunities for the enhancement of the natural environment identified in the NCA profiles?				landscape sensitivity (to the north), and high and medium landscape sensitivity (to the south) as well as high sensitivity to the west ⁽⁶⁾ . There is potential for effects on landscape character if safeguarded land were to be developed in the longer term, although the exact nature of effects are uncertain as they are dependent on proposal specific information. The Council's evidence notes that land to the north of Mill Hayes Road could be phased for development beyond the Plan period (in coordination with the release of BD069, BD117 & BD131b) ⁽⁷⁾ . Overall this option has been assessed as having a negative effect on this objective although the exact effects are uncertain. Effects would arise beyond the plan period.	Permanent; Assumptions made: Policies in the Local Plan will provide protection for landscape character and natural assets. However the cumulative impact of development risks resulting in an adverse effect on the character of landscapes, including historic landscapes. Mitigation measures: Local Plan policies to support protection and enhancement of the character and appearance of the landscape including historic landscape and other natural assets and resources.
15. To encourage further development of sustainable tourism, cultural heritage and local distinctiveness.	● Will it support the development of a vibrant cultural economy and local distinctiveness? ● Does it help support tourism and the visitor economy?	0	0	0	This option envisages strategic Green Belt release for safeguarded land. Enabling residential use of such land in the longer term (beyond the plan period) would limit the effect that it could have on opportunities for investment in culture and tourism. However any long term	Geographical scale: Biddulph; Effects: Permanent; Assumptions made: Proposals that have a positive effect on the prosperity of the town centre are likely to result in support for tourism and the visitor economy in the long term. Mitigation

Option 3: Strategic Green Belt release to enable safeguarding						
SA Objective	Decision making criteria		Time-frame		Nature of effect; Comments	Justification; cumulative effects / mitigation measures
	ST	MT	MT	LT		
					increase in population could result in positive effects on the local economy. Overall this option has been assessed as having a neutral effect on this objective.	measures: Local Plan policies to support tourism and the visitor economy.
ECONOMIC						
16. To safeguard the vitality and viability of the District's towns and villages, and create and sustain a vibrant rural economy	<ul style="list-style-type: none"> Will it safeguard shops and services in existing centres? Will it safeguard and improve the retail, leisure and service provision? 	0	0	+	The strategic release of Green Belt could in the long term (beyond the plan period) lead to residential development that is within 1,200m of the town centre and the range of key services and facilities that can be found here. Overall the proposal has been assessed as having a minor positive effect on this objective.	Geographical scale: Biddulph; Effects: Permanent; Assumptions made: Development of residential sites with good access to the town centre is likely to result in a positive effect on the vitality and viability of Biddulph as residents of new developments could be expected to support their local retail, leisure and service provision. Mitigation measures: Local Plan policies to support town and village centres.
17. To strengthen, modernise and diversify the District economy, and promote sustainable economic growth	<ul style="list-style-type: none"> Will it provide a balanced portfolio of employment land in sustainable locations? Will it provide opportunities for the creation of new 	0	0	0	Support for longer term residential development beyond the plan period could encourage investment in people and infrastructure through developer contributions although this would be limited. This proposal has been assessed as having a neutral effect on this objective.	Geographical scale: Biddulph; Effects: Permanent; Assumptions made: A local labour supply will help to deliver economic growth across the plan area. Mitigation measures: Local Plan policies to support sustainable economic growth.

Option 3: Strategic Green Belt release to enable safeguarding						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
	businesses and/or minimise the loss or displacement of existing businesses?					
18. To encourage and support a high and stable level of employment	<ul style="list-style-type: none"> Will it meet the employment needs of local people? Will it increase economic activity levels? Will it improve physical accessibility to jobs? Will it support higher income levels for local residents? 	0	0	+	<p>The proposal could in the longer term (beyond the plan period) facilitate residential development with good proximity to existing employment provision. This proposal has been assessed as having a positive effect on this objective in the longer term.</p>	<p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: Ensuring a sufficient supply of homes within easy access of employment is a central element of an efficiently functioning economy. Mitigation measures: Local Plan policies to support sustainable economic growth.</p>
<p>Summary of significant effects:</p> <p>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 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 to the south</p>						

Option 3: Strategic Green Belt release to enable safeguarding				Justification; cumulative effects / mitigation measures
SA Objective	Decision making criteria	Time-frame		
		ST	MT	LT
<p>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 (risk of odour and noise) and constraints on potential 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.</p>				

Table 4.3 Appraisal of Option 3

1. Letters to the Council dated 4th March 2019 and 31st May 2019
2. 2017 Air Quality Annual Status Report In fulfilment of Part IV of the Environment Act 1995 Local Air Quality Management; SMDC; June 2018
3. Staffordshire Moorlands District Integrated Transport Strategy 2018 -2031; Staffordshire County Council; October 2018
4. Extended phase 1 Habitat Surveys and Local Wildlife Site Assessments; SMDC; Ecus Ltd; August 2017
5. Staffordshire Moorlands Local Plan Habitat Regulations Assessment submission version; February 2018
6. Landscape, Local Green Space and Heritage Impact Study; SMDC; Wardell Armstrong; August 2016
7. Green Belt Review Study; SMDC; Amec Foster Wheeler; November 2015

Option 4: Both targeted and strategic Green Belt release to enable site allocations and safeguarding

Option 4: Targeted and strategic Green Belt release				Justification; cumulative effects / mitigation measures
SA Objective	Decision making criteria	Time-frame		
		ST	MT	LT
SOCIAL				

Option 4: Targeted and strategic Green Belt release						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
1. To improve community cohesion and the quality of where people work and live.	<ul style="list-style-type: none"> Will it make a positive contribution towards community cohesion? Will it improve neighbourhood quality? Will it ensure that there is adequate open space and support Green Infrastructure? Will it minimise light and noise pollution? Will it ensure that occupiers of buildings and spaces have sufficient natural light and appropriate levels of privacy? 	+/-	+/-	+/-	Green Belt release to enable allocation of omission sites alongside land for safeguarding may lead in the long term to the enhancement of existing community facilities and services and this is likely to result in positive effects on this objective. However the proposed locations in the main form part of the ecological network associated with the BVW and this is likely to result in a negative effect arising from the potential for adverse impacts on the District's GI network. Further negative effects on neighbourhood quality and local infrastructure may result from delivery of new homes in close proximity to the Biddulph waste water treatment works where United Utilities has warned of a residual risk of odour and noise as well as potential impact on future expansion options ⁽¹⁾ . Overall the assessment against this objective is considered to be mixed and uncertain as in addition it will be partly dependent on the implementation of Local Plan policies.	<p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: Community cohesion and local environmental quality are dependent on the design and tenure mix, as well as the location of new development. Mitigation measures: Local Plan policies to ensure that good standards of amenity and open space and Green Infrastructure are delivered as part of new housing development.</p>
2. To advance equality of opportunity between all	<ul style="list-style-type: none"> Will it remove or minimise any disadvantages suffered by people 	+	+	++	This option could enable the long term delivery of new development in good proximity to a wide range of town centre services and facilities. This is likely to	<p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: Equality of opportunity for all persons</p>

Option 4: Targeted and strategic Green Belt release						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
persons and eliminate social exclusion by improving access to jobs, services and facilities.	<p>due to their age, disability, gender reassignment, marriage / civil partnership, pregnancy / maternity, race, religion / belief, sex and sexual orientation?</p> <ul style="list-style-type: none"> Will it help to minimise the distance people need to travel to access education, employment, shopping and other key services and facilities. 				<p>result in very positive effects on improving access to jobs, services and facilities which could be expected to contribute to the advancement of equality of opportunity in the long term.</p>	<p>will be improved by any measure that has the effect of improving overall accessibility to jobs, services and facilities. Mitigation measures: Local Plan policies to help ensure that the needs of all members of the community can be addressed by helping to minimise the distance people need to travel to access education, employment, shopping and other key services and facilities.</p>
3. To improve health and reduce health inequalities.	<ul style="list-style-type: none"> Will it improve health or access to health facilities? Will it promote healthy lifestyles? Will it reduce health inequalities? Will it provide opportunities to participate in leisure and recreational 	+	+	-/i	<p>This option could enable the long term delivery (within and beyond the plan period) of new development in proximity to a range of healthcare facilities (eg within 1,200m from a GP surgery and open space). Development on the edge of settlement and close to the BVW may offer opportunities to enable improved recreational access to the countryside. However the area north of Mill Hayes Road includes a playing field,</p>	<p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: Delivering new homes in proximity to existing healthcare services and open space will have a positive effect on health. Mitigation measures: Local Plan policies to ensure that new developments deliver opportunities to increase take up of sustainable transport choices and improvements</p>

Option 4: Targeted and strategic Green Belt release						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
	activities including access to the countryside?				public footpath and sports grounds. Any loss of these facilities is likely to result in significant negative effects. Overall this option has been assessed as having an uncertain effect on this objective in the long term as it is dependent on implementation.	to healthy travel networks, including increased opportunities for access to the countryside.
4. To minimise opportunities for crime and reduce the fear of crime.	<ul style="list-style-type: none"> Will it reduce actual levels of crime? Will it reduce fear of crime? 	?	?	?	There is uncertainty as to the nature of effect and level of significance as this will be dependent on the implementation of Local Plan policies.	<p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: Good design will help minimise opportunities for crime and reduce the fear of crime. Mitigation measures: Local Plan policies to ensure that new developments are well designed, creating safe places and reducing opportunities for anti-social behaviour.</p>
5. To ensure adequate quality and provision of a range of house types to meet local needs in appropriate locations and including affordable / social	<ul style="list-style-type: none"> Will it provide an appropriate mix of housing to enable all needs to be met? Will it enable people to meet their needs within their existing communities? Will it ensure that people can afford their housing? 	+	++	++	Both targeted and strategic Green Belt release around Biddulph allows for sites to come forward in the short term to medium term as well as providing opportunity for meeting longer term needs beyond the plan period through safeguarding land. This could be expected to help enable the delivery of a range of types and tenures, making a	<p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: Whilst delivery would be monitored as part of a Local Plan review - assuming continuation of the current housing requirement by area (20% of 320dpa for Biddulph) - Biddulph's requirement may be</p>

Option 4: Targeted and strategic Green Belt release					Justification; cumulative effects / mitigation measures
SA Objective	Decision making criteria	Time-frame			
		ST	MT	LT	
/extra care housing.					considered to be 63dpa. Larger areas of Green Belt release offer the most potential to meet the long term housing needs of the town and deliver a range of types and tenures of new homes in the long term. Mitigation measures: Wider initiatives of the Council should be supported to help deliver additional affordable homes.
6. To strengthen links between rural areas and towns by sustainable forms of transport and reduce the number of journeys made by car.	<ul style="list-style-type: none"> Will it minimise impacts on existing traffic congestion? Will it support the use of public transport? Will it support safe walking and cycling? Will it protect and improve access to the natural environment and support Green Infrastructure? 	+	+	++	<p>Targeted and strategic Green Belt release could deliver development (within and beyond the plan period) within 500m of a bus stop and this is likely to result in a positive effect from supporting the use of public transport. Future development could also be expected to be in proximity to a range of town centre services and facilities, helping to support the use of walking and cycling. Overall this option has been assessed as having a long term positive effect on this objective.</p> <p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: Development delivered close to public transport, a bus stop, and existing services and facilities will help to reduce the number of journeys made by car. Mitigation measures: Local Plan policies to ensure that developments support safe walking and cycling and improve access to the natural environment.</p>
ENVIRONMENTAL					
7. To minimise contributions to climate change	<ul style="list-style-type: none"> Will it reduce emissions of greenhouse gases particularly CO₂? 	-	-	-	<p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: Even if individual properties are built</p>

Option 4: Targeted and strategic Green Belt release						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
and consider climate change adaptation.	<ul style="list-style-type: none"> Will it increase energy efficiency? Will it increase the use of renewable energy? Will it ensure new development is in accessible locations in order to reduce the need for car use and / or encourage sustainable forms of transport? 				could lead to an increase in greenhouse gas emissions and energy consumption during both construction and occupation. However any development is likely to be within 500m of a bus stop and have good proximity to the town centre with its range of services and facilities, helping to support the use of walking and cycling. Whilst this may help to reduce the need to travel by car, overall this option has been assessed as having a negative effect on this objective.	to high environmental performance standards and delivered in sustainable locations, the total increase in number of dwellings and car journeys is likely to increase energy use and associated greenhouse gas emissions. Mitigation measures: Local Plan policies to ensure that high environmental design standards are supported and that developments are brought forward in accessible locations that support the use of sustainable forms of transport.
8. To improve air quality.	<ul style="list-style-type: none"> Will it minimise emissions of airborne pollutants? Will it maximise the removal of air pollutants (e.g. by trees)? 	-	-	--	Monitoring of air quality in Biddulph indicates that nitrogen dioxide concentrations have shown no clear trend towards improvement or deterioration since 2014. The A527 town centre bypass avoids traffic movements between Congleton and Stoke-on-Trent having to pass through Biddulph town centre and this is generally considered to help maintain air quality. Both targeted and strategic Green Belt release is likely to bring forward additional development (within and beyond the plan period) with some associated adverse impacts on air quality arising from construction, use of	<p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: The main areas identified in the District as being of poor air quality are the Cellarhead junction (between the A52 and A520) and Leek town centre⁽²⁾. An increase in number of dwellings and car journeys across Biddulph is likely to increase emission of airborne pollutants. There is a risk that air quality may deteriorate in areas of existing low quality. Mitigation measures: Local Plan policies to ensure that developments are set</p>

Option 4: Targeted and strategic Green Belt release						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
9. To reduce flood risk, protect and enhance water sources.	<ul style="list-style-type: none"> Is new development directed towards areas of least flood risk? Will it reduce risk of flooding eg by encouraging the integration of mitigation measures such as SuDS into new development? Will it protect, maintain and improve the quality of water resources and help contribute to the objectives of the Water Framework Directive? Will it encourage water efficiency and demand management? 	0	-	-	<p>dwellings, and additional car journeys. Overall this option has been assessed as having a negative effect on this objective, particularly in the long term.</p> <p>Targeted and strategic release of Green Belt would enable additional development to come forward (within and beyond the plan period) some of which would be outside of a floodzone 2 or 3 area where it can be considered that any future development would be unlikely to be subject to risk from flooding. Some released sites may be in an area at risk of flooding from Biddulph Brook (in the north) and where surface water flooding has been recorded (to the south). Future development could be expected to lead to an increase in wastewater and reduction of natural drainage. Mitigation measures are possible however. Overall this option has been assessed as having a negative effect on this objective in the medium and long term.</p>	<p>back from busy roads, include appropriate landscaping to aid removal of air pollutants, and provide support for the Biddulph Local Transport Strategy⁽³⁾.</p> <p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: Development will be permitted only where schemes meet development plan requirements for management of flood risk. Mitigation measures: Local Plan policies to ensure that new developments are directed towards areas of least flood risk and incorporate SuDS wherever possible.</p>

Option 4: Targeted and strategic Green Belt release						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
10. To identify, conserve and enhance biodiversity resources and to test the plan's policies and proposals on European Sites and SSSIs	<ul style="list-style-type: none"> Will it protect and promote effective management of the district's sites of ecological and nature conservation importance? Will it help contribute to Staffordshire Biodiversity Action Plan objectives? Will it help deliver networks of biodiversity and green infrastructure? 	-	--	--	<p>There is potential for future development (within and beyond the plan period) to result in the disturbance of habitats or species. The omission sites and strategic areas are considered to have good connectivity to the wider countryside.⁽⁴⁾ The HRA screening exercise did not identify any LSEs in relation to the draft site allocations in Biddulph (no pathway)⁽⁵⁾. Overall this option has been assessed as having a significant negative effect on this objective in the medium and long term.</p>	<p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: Policies in the Local Plan will provide protection for biodiversity and for sites of ecological and nature conservation importance, however the cumulative impact of development on an ecological network could pose risks of disturbance that would require suitable mitigation. Mitigation measures: Local Plan policies to ensure impacts on biodiversity are minimised, the integrity of ecological networks are protected and proposals provide net gains in biodiversity where possible.</p>
11. To safeguard the best and most versatile agricultural land; improve soil and land resources; and protect and enhance geological resources.	<ul style="list-style-type: none"> Will it safeguard the best and most versatile agricultural land? Will it minimise the loss of greenfield land? Will it reduce land contamination / instability? 	+	+/-	-	<p>Targeted and strategic release of Green Belt may enable the future development of land (within and beyond the plan period) indicated on the predictive map of Best and Most Versatile agricultural land as predominantly within an area considered urban / industrial, but also partly where 20 - 60% of the land is considered likely to be BMV and partly where 20% or less is likely to be BMV and so this option is only partly likely to</p>	<p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: The proposal could avoid the loss of agricultural land including the best and most versatile. Mitigation measures: Local Plan policies to ensure protection and enhancement of geologically important sites. Also Plan policies to avoid where possible non-mineral development taking place</p>

Option 4: Targeted and strategic Green Belt release					Justification; cumulative effects / mitigation measures	
SA Objective	Decision making criteria	Time-frame				Nature of effect; Comments
		ST	MT	LT		
	<ul style="list-style-type: none"> Will it reduce the amount of derelict land? Will it protect notable geological and geomorphological features? 				<p>result in protection of best and most versatile agricultural land. Land proposed for release includes sites also within the Coal Authority development high risk area and mineral safeguarding area for superficial sand and gravel. Land north of Mill Hayes Road includes the Regionally Important Geological Site Knypersley Meltwater channel. Overall this option has been assessed as having a negative effect on this objective.</p>	<p>in Minerals Safeguarding Areas and the unnecessary sterilisation of minerals. Consultation with the Coal Authority should be required.</p>
12. To minimise the use of non-renewable resources.	<ul style="list-style-type: none"> Will it reduce waste generation? Will it maximise the re-use of existing buildings? Will it increase the use of building materials from sustainable sources? 	?	?	?	<p>There is uncertainty as to the nature of effect and level of significance as this will be dependent on the implementation of Local Plan policies.</p>	<p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: Policies in the Local Plan will encourage the re-use of existing buildings wherever possible. Mitigation measures: Local Plan policies to support waste minimisation.</p>
13. To protect and enhance the character of towns / villages and other heritage and archaeological assets along with their settings.	<ul style="list-style-type: none"> Will it ensure the continued protection and enhancement of cultural and historic heritage assets (designated and non-designated 	-	-	--/?	<p>Targeted and specific release of Green Belt could lead to future development (within and beyond the plan period) within 400m of Grade II* Knypersley Hall, its landscape park and other heritage assets to the south, within 400m of a number of grade II listed assets including Whitehouse Cottage, Holly Lane to the</p>	<p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: Policies in the Local Plan will provide protection for heritage and archaeological assets along with their settings. However the cumulative impact of development in proximity to</p>

Option 4: Targeted and strategic Green Belt release						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
	<ul style="list-style-type: none"> assets) along with their settings? Will it protect and reinforce the character and appearance of the district's towns and villages and maintain and strengthen local distinctiveness and sense of place? 				<p>west and within 500m of Biddulph Grange Conservation Area and other heritage assets to the north. Dependent on proposal specific information, there is scope that this option could lead to the deterioration of the setting of designated heritage assets. This option has been assessed as having an overall negative effect on this objective although the exact nature of effects are uncertain.</p>	<p>designated heritage assets increases the risk of harm or loss of significance. Mitigation measures: Local Plan policies to support protection and enhancement for the character of towns / villages; heritage and archaeological assets along with their settings.</p>
<p>14. To protect and enhance the character and appearance of the landscape including historic landscape and other natural assets and resources.</p> <ul style="list-style-type: none"> Will it protect and enhance the character of the landscape and maintain and strengthen local distinctiveness? Will it promote development on brownfield land? Will it safeguard protected sites and provide opportunities for the enhancement of the natural environment identified in the NCA profiles? 	<ul style="list-style-type: none"> Will it protect and enhance the character of the landscape and maintain and strengthen local distinctiveness? Will it promote development on brownfield land? Will it safeguard protected sites and provide opportunities for the enhancement of the natural environment identified in the NCA profiles? 	-	--	--/?	<p>Targeted and strategic sites considered for Green Belt release include areas considered to be of low, medium and high landscape sensitivity⁽⁶⁾. There is potential for effects on landscape character if developed in the long term, although the exact nature of effects are uncertain as they are dependent on proposal specific information. The Council's evidence notes that land to the north of Mill Hayes Road could be phased for development beyond the Plan period (in coordination with the release of BD069, BD117 & BD131b)⁽⁷⁾. Overall this option has been assessed as having a negative effect on this objective although the exact effects are uncertain.</p>	<p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: Policies in the Local Plan will provide protection for landscape character and natural assets. However the cumulative impact of development risks resulting in an adverse effect on the character of landscapes, including historic landscapes. Mitigation measures: Local Plan policies to support protection and enhancement of the character and appearance of the landscape including historic landscape and other natural assets and resources.</p>

Option 4: Targeted and strategic Green Belt release						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
15. To encourage further development of sustainable tourism, cultural heritage and local distinctiveness.	<ul style="list-style-type: none"> Will it support the development of a vibrant cultural economy and local distinctiveness? Does it help support tourism and the visitor economy? 	0	0	0	Enabling residential use of areas released from the Green Belt limits the effect that it can have on opportunities for investment in culture and tourism (within and beyond the plan period). However any long term increase in population could result in positive effects on the local economy. Overall this option has been assessed as having a neutral effect on this objective.	<p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: Proposals that have a positive effect on the prosperity of the town centre are likely to result in support for tourism and the visitor economy in the long term. Mitigation measures: Local Plan policies to support tourism and the visitor economy.</p>
ECONOMIC						
16. To safeguard the vitality and viability of the District's towns and villages, and create and sustain a vibrant rural economy	<ul style="list-style-type: none"> Will it safeguard shops and services in existing centres? Will it safeguard and improve the retail, leisure and service provision? 	+	+	+	The targeted and strategic release of Green Belt could (within and beyond the plan period) lead to residential development that is in good proximity of the town centre and the range of key services and facilities that can be found here. Overall the proposal has been assessed as having a minor positive effect on this objective.	<p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: Development of residential sites with good access to the town centre is likely to result in a positive effect on the vitality and viability of Biddulph as residents of new developments could be expected to support their local retail, leisure and service provision. Mitigation measures: Local Plan policies to support town and village centres.</p>
17. To strengthen, modernise and diversify the	<ul style="list-style-type: none"> Will it provide a balanced portfolio of 	0	0	0	Residential development (within and beyond the plan period) could encourage investment in people and infrastructure	<p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: A</p>

Option 4: Targeted and strategic Green Belt release						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
District economy, and promote sustainable economic growth	<ul style="list-style-type: none"> employment land in sustainable locations? Will it provide opportunities for the creation of new businesses and/or minimise the loss or displacement of existing businesses? 			LT	through developer contributions although this would be limited. This proposal has been assessed as having a neutral effect on this objective.	local labour supply will help to deliver economic growth across the plan area. Mitigation measures: Local Plan policies to support sustainable economic growth.
18. To encourage and support a high and stable level of employment	<ul style="list-style-type: none"> Will it meet the employment needs of local people? Will it increase economic activity levels? Will it improve physical accessibility to jobs? Will it support higher income levels for local residents? 	+	+	+	The proposal could (within and beyond the plan period) facilitate residential development with good access to existing employment provision. This proposal has been assessed as having a positive effect on this objective.	Geographical scale: Biddulph; Effects: Permanent; Assumptions made: Ensuring a sufficient supply of homes within easy access of employment is a central element of an efficiently functioning economy. Mitigation measures: Local Plan policies to support sustainable economic growth.
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						

Option 4: Targeted and strategic Green Belt release						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
		<p>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 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. 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 (risk of odour and noise and constraints on potential 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.</p>				

Table 4.4 Appraisal of Option 4

1. Letters to the Council dated 4th March 2019 and 31st May 2019
2. 2017 Air Quality Annual Status Report In fulfilment of Part IV of the Environment Act 1995 Local Air Quality Management; SMDC; June 2018
3. Staffordshire Moorlands District Integrated Transport Strategy 2018 -2031; Staffordshire County Council; October 2018
4. Extended phase 1 Habitat Surveys and Local Wildlife Site Assessments; SMDC; Ecus Ltd; August 2017 and updated November 2017
5. Staffordshire Moorlands Local Plan Habitat Regulations Assessment submission version; February 2018
6. Landscape, Local Green Space and Heritage Impact Study; SMDC; Wardell Armstrong; August 2016 and update October 2017
7. Green Belt Review Study; SMDC; Amec Foster Wheeler; November 2015

Option 5: Increased development densities and limited release for safeguarding

Option 5: Increased development densities and limited release for safeguarding		Justification; cumulative effects / mitigation measures			
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments
		ST	MT	LT	
SOCIAL					
1. To improve community cohesion and the quality of where people work and live.	<ul style="list-style-type: none"> Will it make a positive contribution towards community cohesion? Will it improve neighbourhood quality? Will it ensure that there is adequate open space and support Green Infrastructure? Will it minimise light and noise pollution? Will it ensure that occupiers of buildings and spaces have sufficient natural light and appropriate levels of privacy? 	+/-	+/-	+/-	<p>Minimising the need for Greenbelt release via increasing development densities on existing allocations alongside limited release for safeguarding may lead in the long term to the enhancement of existing community facilities and services and this is likely to result in positive effects on this objective. However the proposed location for safeguarding to the north forms part of the ecological network associated with the BVW and potential for future development is likely to lead to a negative effect arising from possible adverse impacts on the District's GI network. Further negative effects on neighbourhood quality and local infrastructure may result from delivery of new homes in close proximity to the Biddulph waste water treatment works where United Utilities has warned of a residual risk of odour and noise as well as potential impact on future expansion options⁽¹⁾. Overall the assessment against this objective is</p>
					<p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: Community cohesion and local environmental quality are dependent on the design and tenure mix, as well as the location of new development. Mitigation measures: Local Plan policies to ensure that good standards of amenity and open space and Green Infrastructure are delivered as part of new housing development.</p>

Option 5: Increased development densities and limited release for safeguarding						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
2. To advance equality of opportunity between all persons and eliminate social exclusion by improving access to jobs, services and facilities.	<ul style="list-style-type: none"> Will it remove or minimise any disadvantages suffered by people due to their age, disability, gender reassignment, marriage / civil partnership, pregnancy / maternity, race, religion / belief, sex and sexual orientation? Will it help to minimise the distance people need to travel to access education, employment, shopping and other key services and facilities. 	+	+	++	<p>considered to be mixed and uncertain as in addition it will be partly dependent on the implementation of Local Plan policies.</p> <p>This option could enable the medium to long term delivery (within and beyond the plan period) of new development in good proximity to a wide range of town centre services and facilities. This is likely to result in very positive effects on improving access to jobs, services and facilities which could be expected to contribute to the advancement of equality of opportunity in the long term.</p>	<p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: Equality of opportunity for all persons will be improved by any measure that has the effect of improving overall accessibility to jobs, services and facilities. Mitigation measures: Local Plan policies to help ensure that the needs of all members of the community can be addressed by helping to minimise the distance people need to travel to access education, employment, shopping and other key services and facilities.</p>
3. To improve health and reduce health inequalities.	<ul style="list-style-type: none"> Will it improve health or access to health facilities? 	+	+	+/i	<p>This option could enable the medium to long term delivery (within and beyond</p>	<p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made:</p>

Option 5: Increased development densities and limited release for safeguarding						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
	<ul style="list-style-type: none"> Will it promote healthy lifestyles? Will it reduce health inequalities? Will it provide opportunities to participate in leisure and recreational activities including access to the countryside? 				<p>the plan period) of new development in proximity to a range of healthcare facilities (eg within 1,200m from a GP surgery and open space). Development on the edge of settlement and close to the BVW may offer opportunities to enable improved recreational access to the countryside. Overall this option has been assessed as having a positive but uncertain effect on this objective in the long term as it is dependent on implementation.</p>	<p>Delivering new homes in proximity to existing healthcare services and open space will have a positive effect on health. Mitigation measures: Local Plan policies to ensure that new developments deliver opportunities to increase take up of sustainable transport choices and improvements to healthy travel networks, including increased opportunities for access to the countryside.</p>
4. To minimise opportunities for crime and reduce the fear of crime.	<ul style="list-style-type: none"> Will it reduce actual levels of crime? Will it reduce fear of crime? 	?	?	?	<p>There is uncertainty as to the nature of effect and level of significance as this will be dependent on the implementation of Local Plan policies.</p>	<p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: Good design will help minimise opportunities for crime and reduce the fear of crime. Mitigation measures: Local Plan policies to ensure that new developments are well designed, creating safe places and reducing opportunities for anti-social behaviour.</p>
5. To ensure adequate quality and provision of a range of house types to meet local needs in	<ul style="list-style-type: none"> Will it provide an appropriate mix of housing to enable all needs to be met? Will it enable people to meet their needs 	+	+	+	<p>Both increased development densities and limited Green Belt release to the north of Biddulph allows for boosting the supply of new homes in the medium to long term (within the plan period) as</p>	<p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: Whilst delivery would be monitored as part of a Local Plan</p>

Option 5: Increased development densities and limited release for safeguarding						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
appropriate locations and including affordable / social /extra care housing.	<ul style="list-style-type: none"> within their existing communities? Will it ensure that people can afford their housing? 				well as providing some opportunity for meeting longer term needs beyond the plan period through safeguarding land. This could be expected to help enable the delivery of a range of types and tenures, making a contribution to meeting the needs of the whole community. Overall this option has been assessed as having a positive effect on this objective.	review - assuming continuation of the current housing requirement by area (20% of 320dpa for Biddulph) - Biddulph's requirement may be considered to be 63dpa. On this basis, safeguarding sites to the north of Biddulph would yield around two years future supply. Larger areas of Green Belt release offer the most potential to meet the long term housing needs of the town and deliver a range of types and tenures of new homes in the long term. Mitigation measures: Wider initiatives of the Council should be supported to help deliver additional affordable homes.
6. To strengthen links between rural areas and towns by sustainable forms of transport and reduce the number of journeys made by car.	<ul style="list-style-type: none"> Will it minimise impacts on existing traffic congestion? Will it support the use of public transport? Will it support safe walking and cycling? Will it protect and improve access to the natural environment and support Green Infrastructure? 	+	+	++	Increased development densities and limited Green Belt release for safeguarding could deliver development (within and beyond the plan period) within 500m of a bus stop and this is likely to result in a positive effect from supporting the use of public transport. Future development could also be expected to be in proximity to a range of town centre services and facilities, helping to support the use of walking and cycling. Overall this option has	<p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: Development delivered close to public transport, a bus stop, and existing services and facilities will help to reduce the number of journeys made by car. Mitigation measures: Local Plan policies to ensure that developments support safe walking and cycling and improve access to the natural environment.</p>

Option 5: Increased development densities and limited release for safeguarding						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
					been assessed as having a long term positive effect on this objective.	
ENVIRONMENTAL						
7. To minimise contributions to climate change and consider climate change adaptation.	<ul style="list-style-type: none"> Will it reduce emissions of greenhouse gases particularly CO₂? Will it increase energy efficiency? Will it increase the use of renewable energy? Will it ensure new development is in accessible locations in order to reduce the need for car use and / or encourage sustainable forms of transport? 	-	-	-	<p>Delivery of additional new homes (within and beyond the plan period) could lead to an increase in greenhouse gas emissions and energy consumption during both construction and occupation. However any development is likely to be within 500m of a bus stop and have good proximity to the town centre with its range of services and facilities, helping to support the use of walking and cycling. Whilst this may help to reduce the need to travel by car, overall this option has been assessed as having a negative effect on this objective.</p>	<p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: Even if individual properties are built to high environmental performance standards and delivered in sustainable locations, the total increase in number of dwellings and car journeys is likely to increase energy use and associated greenhouse gas emissions. Mitigation measures: Local Plan policies to ensure that high environmental design standards are supported and that developments are brought forward in accessible locations that support the use of sustainable forms of transport.</p>
8. To improve air quality.	<ul style="list-style-type: none"> Will it minimise emissions of airborne pollutants? Will it maximise the removal of air pollutants (e.g. by trees)? 	-	-	--	<p>Monitoring of air quality in Biddulph indicates that nitrogen dioxide concentrations have shown no clear trend towards improvement or deterioration since 2014. The A527 town centre bypass avoids traffic</p>	<p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: The main areas identified in the District as being of poor air quality are the Cellarhead junction (between the A52 and A520) and Leek town centre⁽²⁾.</p>

Option 5: Increased development densities and limited release for safeguarding						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
9. To reduce flood risk, protect and enhance water sources.	<ul style="list-style-type: none"> Is new development directed towards areas of least flood risk? Will it reduce risk of flooding eg by encouraging the integration of mitigation measures such as SuDS into new development? Will it protect, maintain and improve the quality of water 	0	+	- / ?	<p>movements between Congleton and Stoke-on-Trent having to pass through Biddulph town centre and this is generally considered to help maintain air quality. Both increased development densities and limited Green Belt release is likely to bring forward additional development (within and beyond the plan period) with some associated adverse impacts on air quality arising from construction, use of dwellings, and additional car journeys. Overall this option has been assessed as having a negative effect on this objective, particularly in the long term.</p> <p>Increased development densities and limited release of Green Belt to the north of Biddulph would enable additional development to come forward (within and beyond the plan period) outside of a floodzone 2 or 3 area where it can be considered that any future development would be unlikely to be subject to risk from flooding. Safeguarded sites may be at risk of flooding from Biddulph Brook. Future development could be expected to lead to an increase in wastewater and reduction of natural drainage. Mitigation</p>	<p>An increase in number of dwellings and car journeys across Biddulph is likely to increase emission of airborne pollutants. There is a risk that air quality may deteriorate in areas of existing low quality. Mitigation measures: Local Plan policies to ensure that developments are set back from busy roads, include appropriate landscaping to aid removal of air pollutants, and provide support for the Biddulph Local Transport Strategy⁽³⁾.</p> <p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: Development will be permitted only where schemes meet development of plan requirements for management of flood risk. Mitigation measures: Local Plan policies to ensure that new developments are directed towards areas of least flood risk and incorporate SuDS wherever possible.</p>

Option 5: Increased development densities and limited release for safeguarding						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
	<ul style="list-style-type: none"> resources and help contribute to the objectives of the Water Framework Directive? Will it encourage water efficiency and demand management? 				measures are possible however. Overall this option has been assessed as having a negative effect on this objective in the medium and long term, although the exact effects are uncertain.	
10. To identify, conserve and enhance biodiversity resources and to test the plan's policies and proposals on European Sites and SSSIs	<ul style="list-style-type: none"> Will it protect and promote effective management of the district's sites of ecological and nature conservation importance? Will it help contribute to Staffordshire Biodiversity Action Plan objectives? Will it help deliver networks of biodiversity and green infrastructure? 	0	0/?	-/?	There is potential for future development (within and beyond the plan period) to result in the disturbance of habitats or species. The safeguarded sites are considered to have good connectivity to the wider countryside. ⁽⁴⁾ The HRA screening exercise did not identify any LSEs in relation to the draft site allocations in Biddulph (no pathway) ⁽⁵⁾ . Overall this option has been assessed as having a negative effect on this objective in the long term, although the exact effects are uncertain.	<p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: Policies in the Local Plan will provide protection for biodiversity and for sites of ecological and nature conservation importance, however the cumulative impact of development on an ecological network could pose risks of disturbance that would require suitable mitigation. Mitigation measures: Local Plan policies to ensure impacts on biodiversity are minimised, the integrity of ecological networks are protected and proposals provide net gains in biodiversity where possible.</p>
11. To safeguard the best and most	<ul style="list-style-type: none"> Will it safeguard the best and most 	+	+/-	-	Increased development densities and limited release of Green Belt to the	<p>Geographical scale: Biddulph; Effects:</p>

Option 5: Increased development densities and limited release for safeguarding					Justification; cumulative effects / mitigation measures	
SA Objective	Decision making criteria	Time-frame				Nature of effect; Comments
		ST	MT	LT		
versatile agricultural land; improve soil and land resources; and protect and enhance geological resources.	<ul style="list-style-type: none"> versatile agricultural land? Will it minimise the loss of greenfield land? Will it reduce land contamination / instability? Will it reduce the amount of derelict land? Will it protect notable geological and geomorphological features? 				north may enable the delivery of new homes (within and beyond the plan period) in locations indicated on the predictive map of Best and Most Versatile agricultural land as predominantly considered urban / industrial, but also partly where 20% or less is likely to be BMV and so this option is only partly likely to result in protection of best and most versatile agricultural land. Sites proposed for release for safeguarding includes land within the mineral safeguarding area for superficial sand and gravel and partially within the Coal Authority development high risk area. Overall this option has been assessed as having a negative effect on this objective in the long term.	Permanent; Assumptions made: The proposal could avoid the loss of agricultural land including the best and most versatile. Mitigation measures: Local Plan policies to ensure protection and enhancement of geologically important sites. Also Plan policies to avoid where possible non-mineral development taking place in Minerals Safeguarding Areas and the unnecessary sterilisation of minerals. Consultation with the Coal Authority should be required.
12. To minimise the use of non-renewable resources.	<ul style="list-style-type: none"> Will it reduce waste generation? Will it maximise the re-use of existing buildings? Will it increase the use of building materials from sustainable sources? 	?	?	?	There is uncertainty as to the nature of effect and level of significance as this will be dependent on the implementation of Local Plan policies.	Geographical scale: Biddulph; Effects: Permanent; Assumptions made: Policies in the Local Plan will encourage the re-use of existing buildings wherever possible. Mitigation measures: Local Plan policies to support waste minimisation.

Option 5: Increased development densities and limited release for safeguarding						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
13. To protect and enhance the character of towns / villages and other heritage and archaeological assets along with their settings.	<ul style="list-style-type: none"> Will it ensure the continued protection and enhancement of cultural and historic heritage assets (designated and non-designated assets) along with their settings? Will it protect and reinforce the character and appearance of the district's towns and villages and maintain and strengthen local distinctiveness and sense of place? 	+	+	-/?	Increased development densities and limited release of Green Belt for safeguarded land to the north could lead to future development (beyond the plan period) within 500m of Biddulph Grange Conservation Area and other heritage assets to the north. Dependent on proposal specific information, there is scope that this option could lead to the deterioration of the setting of designated heritage assets. This option has been assessed as having an overall positive but uncertain effect on this objective.	<p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: Policies in the Local Plan will provide protection for heritage and archaeological assets along with their settings. However the cumulative impact of development in proximity to designated heritage assets increases the risk of harm or loss of significance. Mitigation measures: Local Plan policies to support protection and enhancement for the character of towns / villages; heritage and archaeological assets along with their settings.</p>
14. To protect and enhance the character and appearance of the landscape including historic landscape and other natural	<ul style="list-style-type: none"> Will it protect and enhance the character of the landscape and maintain and strengthen local distinctiveness? 	0	-0	-/?	Sites considered for Green Belt release to the north are considered to be of low landscape sensitivity ⁽⁶⁾ . There is potential for cumulative effects on landscape character if developed in the long term (beyond the plan period) although the exact nature of effects are uncertain as they are dependent on	<p>Geographical scale: Biddulph; Effects: Permanent; Assumptions made: Policies in the Local Plan will provide protection for landscape character and natural assets. However the cumulative impact of development risks resulting in an adverse effect on</p>

Option 5: Increased development densities and limited release for safeguarding						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
assets and resources.	<ul style="list-style-type: none"> Will it promote development on brownfield land? Will it safeguard protected sites and provide opportunities for the enhancement of the natural environment identified in the NCA profiles? 				proposal specific information. Overall this option has been assessed as having a negative effect on this objective in the long term although the exact effects are uncertain.	the character of landscapes, including historic landscapes. Mitigation measures: Local Plan policies to support protection and enhancement of the character and appearance of the landscape including historic landscape and other natural assets and resources.
15. To encourage further development of sustainable tourism, cultural heritage and local distinctiveness.	<ul style="list-style-type: none"> Will it support the development of a vibrant cultural economy and local distinctiveness? Does it help support tourism and the visitor economy? 	0	0	0	Enabling residential use of areas released from the Green Belt limits the effect that it can have on opportunities for investment in culture and tourism (beyond the plan period). However any long term increase in population could result in positive effects on the local economy. Overall this option has been assessed as having a neutral effect on this objective.	Geographical scale: Biddulph; Effects: Permanent; Assumptions made: Proposals that have a positive effect on the prosperity of the town centre are likely to result in support for tourism and the visitor economy in the long term. Mitigation measures: Local Plan policies to support tourism and the visitor economy.
ECONOMIC						
16. To safeguard the vitality and viability of the District's towns and villages, and create and sustain	<ul style="list-style-type: none"> Will it safeguard shops and services in existing centres? Will it safeguard and improve the retail, 	+	+	+	Increased development densities and limited release of Green Belt for safeguarding could (within and beyond the plan period) lead to residential development that is in good proximity of the town centre and the range of key	Geographical scale: Biddulph; Effects: Permanent; Assumptions made: Development of residential sites with good access to the town centre is likely to result in a positive effect on

Option 5: Increased development densities and limited release for safeguarding						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
a vibrant rural economy	leisure and service provision?				services and facilities that can be found here. Overall the proposal has been assessed as having a minor positive effect on this objective.	the vitality and viability of Biddulph as residents of new developments could be expected to support their local retail, leisure and service provision. Mitigation measures: Local Plan policies to support town and village centres.
17. To strengthen, modernise and diversify the District economy, and promote sustainable economic growth	<ul style="list-style-type: none"> Will it provide a balanced portfolio of employment land in sustainable locations? Will it provide opportunities for the creation of new businesses and/or minimise the loss or displacement of existing businesses? 	0	0	0	Residential development (within and beyond the plan period) could encourage investment in people and infrastructure through developer contributions although this would be limited. This proposal has been assessed as having a neutral effect on this objective.	Geographical scale: Biddulph; Effects: Permanent; Assumptions made: A local labour supply will help to deliver economic growth across the plan area. Mitigation measures: Local Plan policies to support sustainable economic growth.
18. To encourage and support a high and stable level of employment	<ul style="list-style-type: none"> Will it meet the employment needs of local people? Will it increase economic activity levels? 	+	+	+	The proposal could (within and beyond the plan period) facilitate residential development with good access to existing employment provision. This proposal has been assessed as having a positive effect on this objective.	Geographical scale: Biddulph; Effects: Permanent; Assumptions made: Ensuring a sufficient supply of homes within easy access of employment is a central element of an efficiently functioning economy. Mitigation

Option 5: Increased development densities and limited release for safeguarding						
SA Objective	Decision making criteria	Time-frame			Nature of effect; Comments	Justification; cumulative effects / mitigation measures
		ST	MT	LT		
	<ul style="list-style-type: none"> Will it improve physical accessibility to jobs? Will it support higher income levels for local residents? 					<p>measures: Local Plan policies to support sustainable economic growth.</p>
<p>Summary of significant effects:</p> <p>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, 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. Although the appraisal notes that since this option proposes increasing densities on allocated sites and safeguarding land in 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 may be managed. 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.</p>						

Table 4.5 Appraisal of Option 5

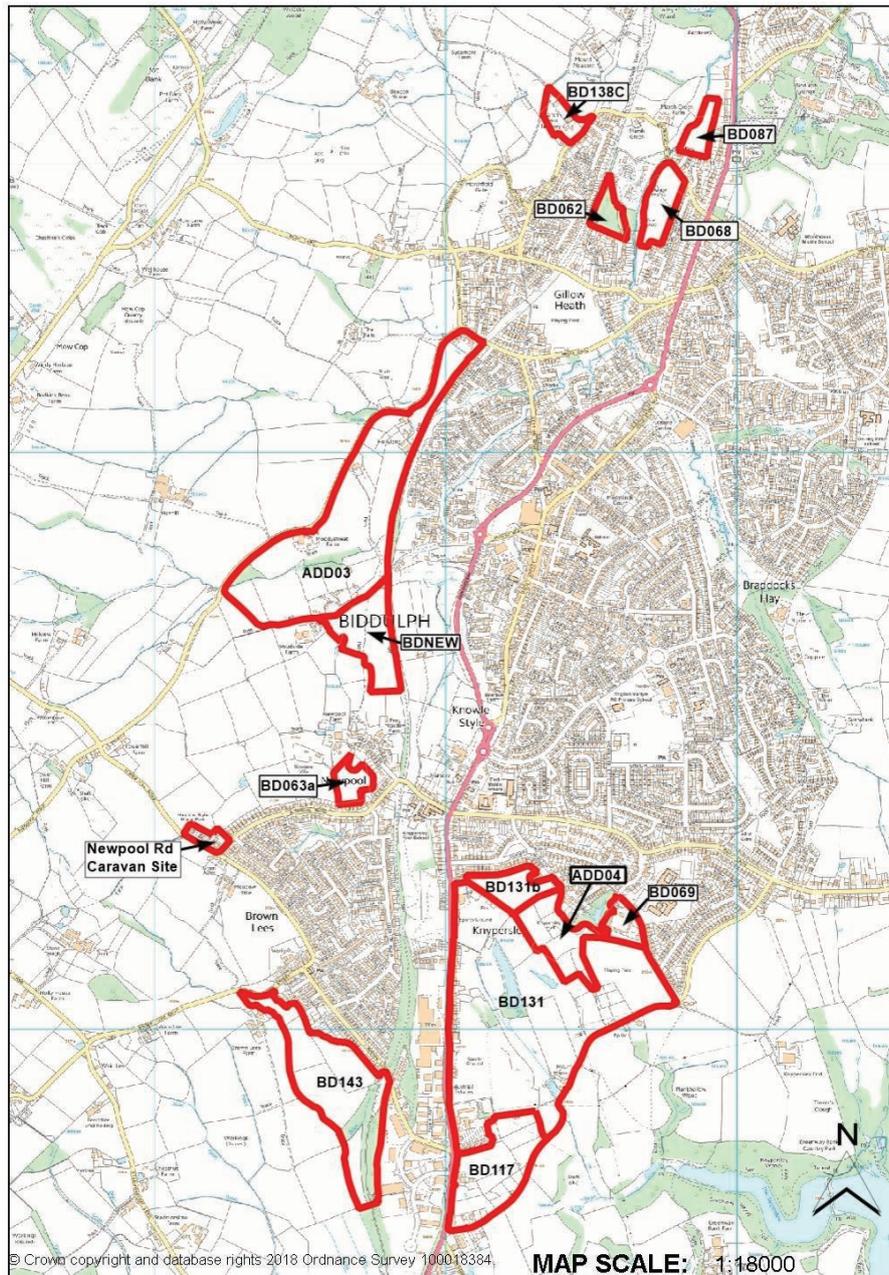
1. Letters to the Council dated 4th March 2019 and 31st May 2019
2. 2017 Air Quality Annual Status Report In fulfilment of Part IV of the Environment Act 1995 Local Air Quality Management; SMDC; June 2018
3. Staffordshire Moorlands District Integrated Transport Strategy 2018 -2031; Staffordshire County Council; October 2018
4. Extended phase 1 Habitat Surveys and Local Wildlife Site Assessments; SMDC; Ecus Ltd; August 2017 and updated November 2017
5. Staffordshire Moorlands Local Plan Habitat Regulations Assessment submission version; February 2018
6. Landscape, Local Green Space and Heritage Impact Study; SMDC; Wardell Armstrong; August 2016 and update October 2017

Maps



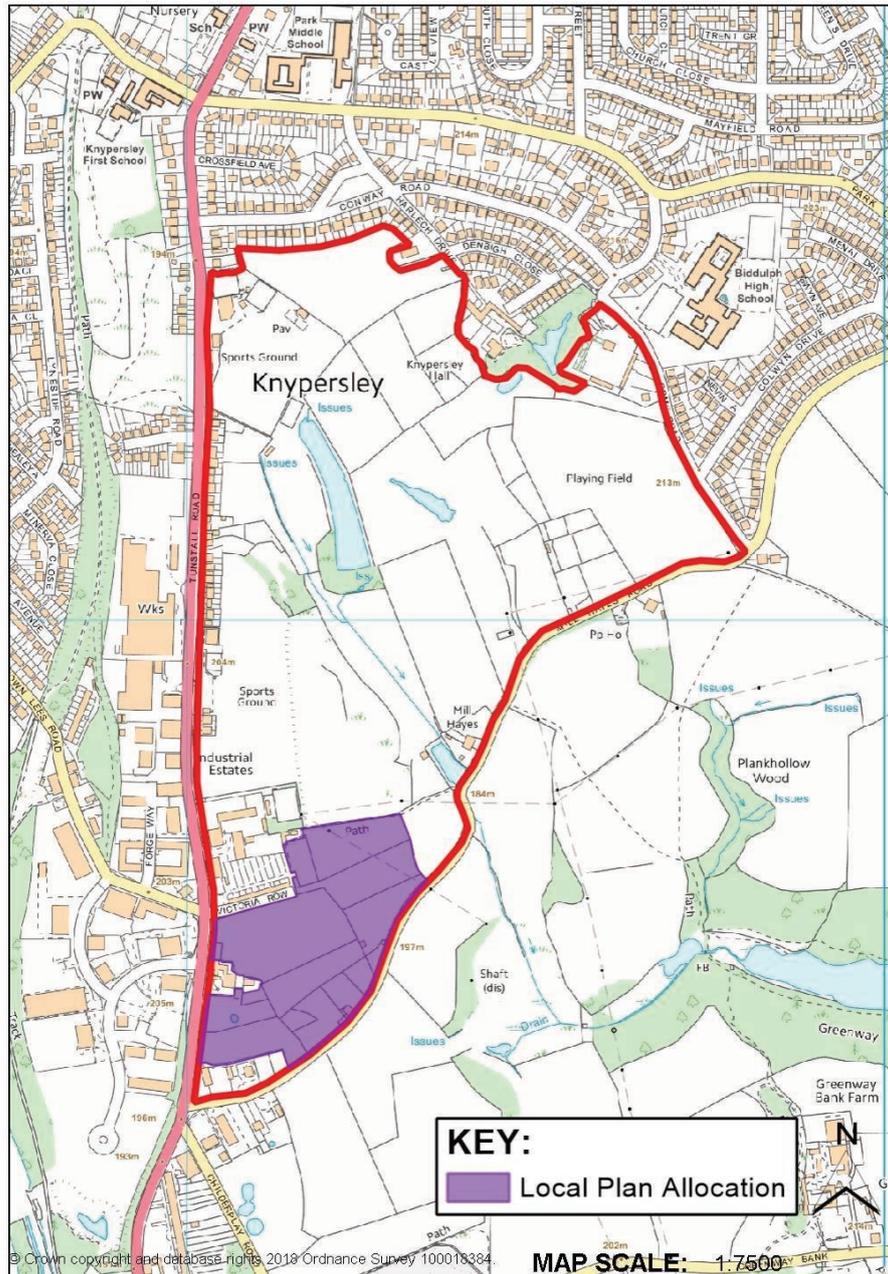
5 Maps

Sites Suitable for Green Belt Release in Green Belt Review



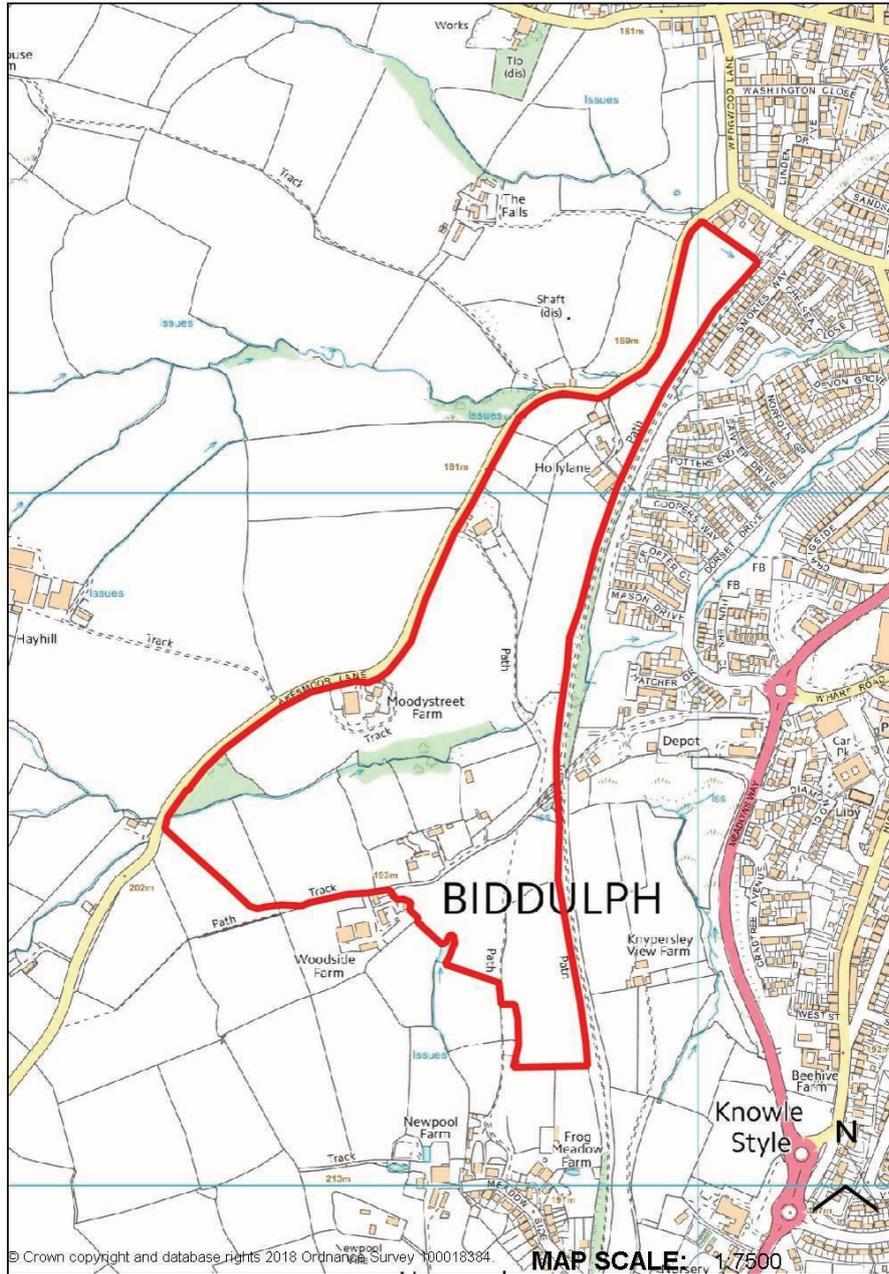
Map 5.1 Sites considered suitable for Green Belt release

Map A - Area North of Mill Hayes Road, Knypersley



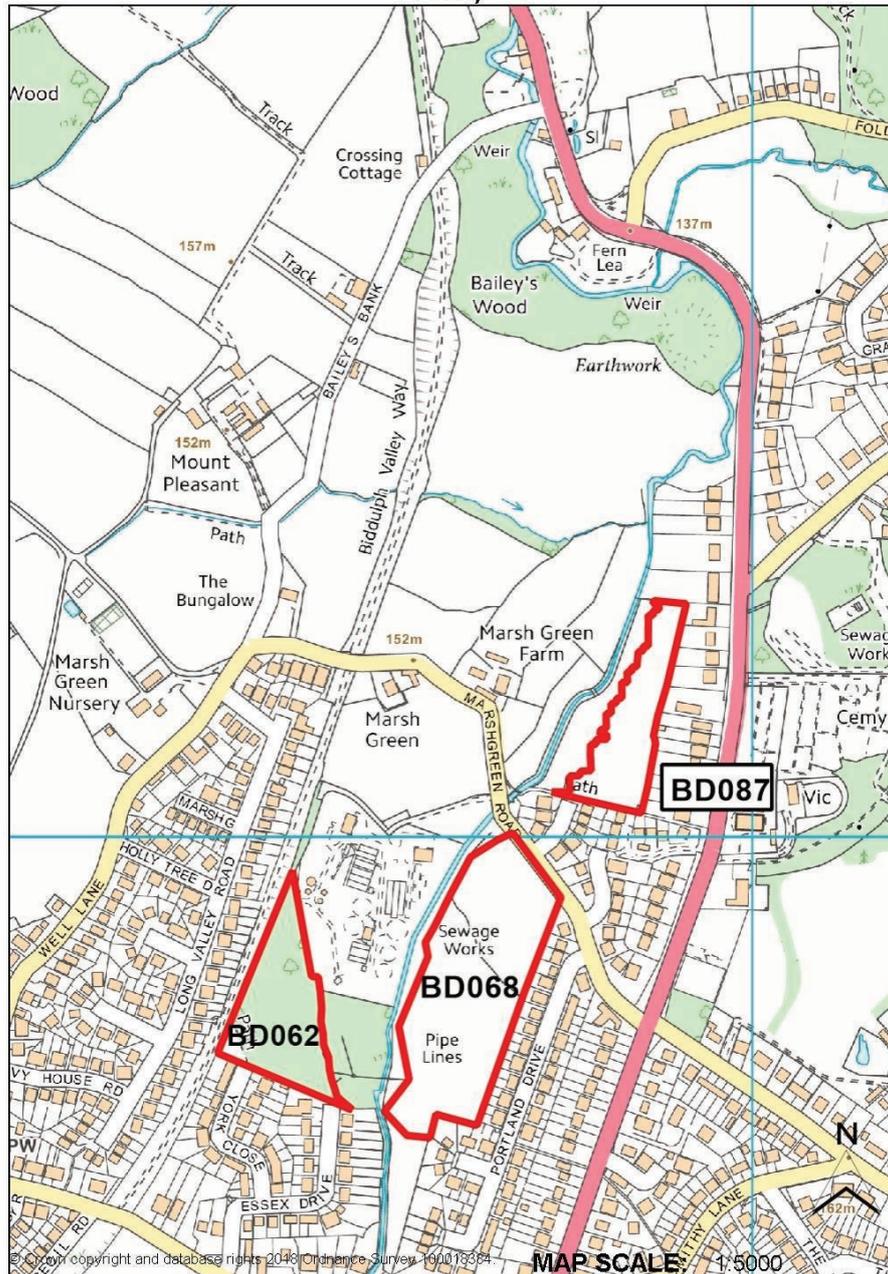
Map 5.2 Area north of Mill Hayes Road

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



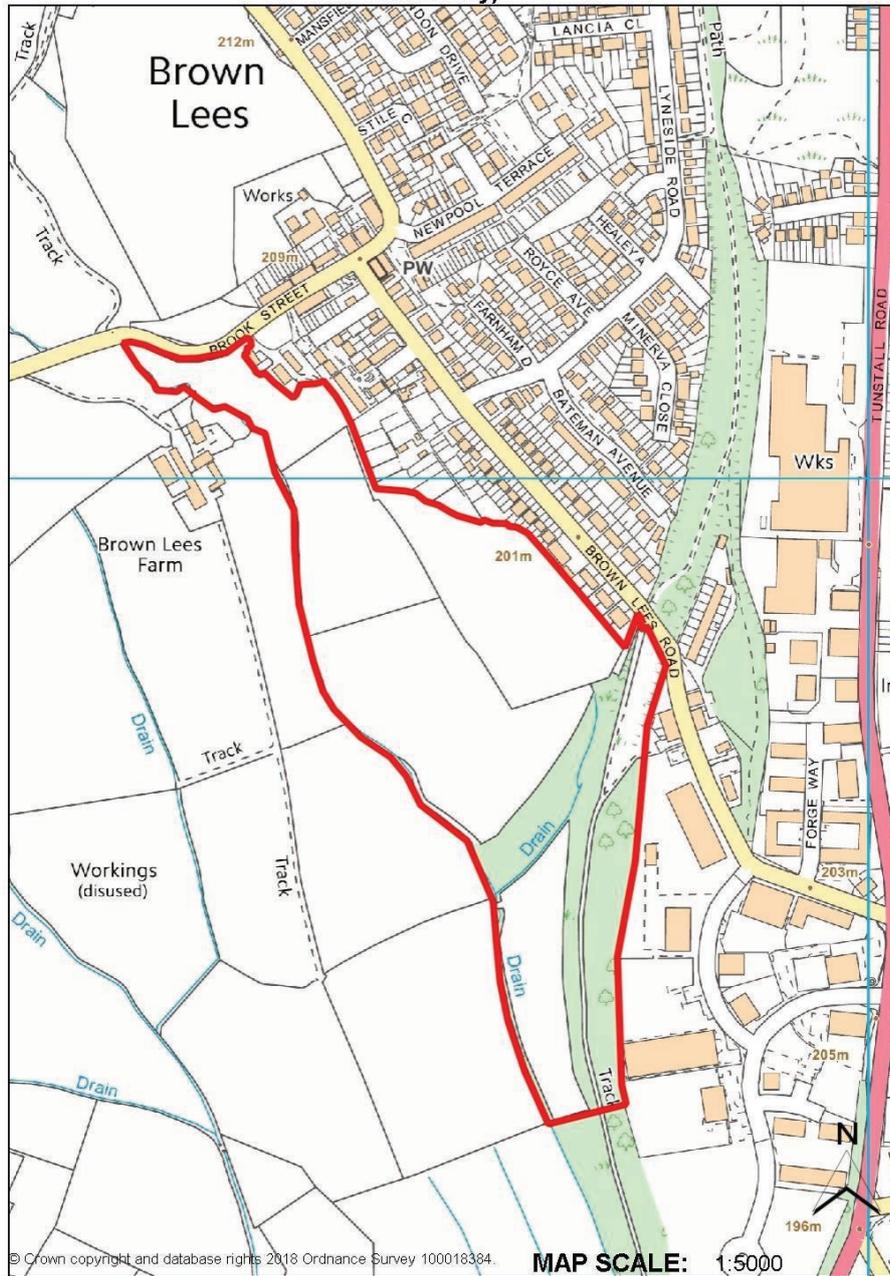
Map 5.3 Area west of Biddulph Valley Way

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



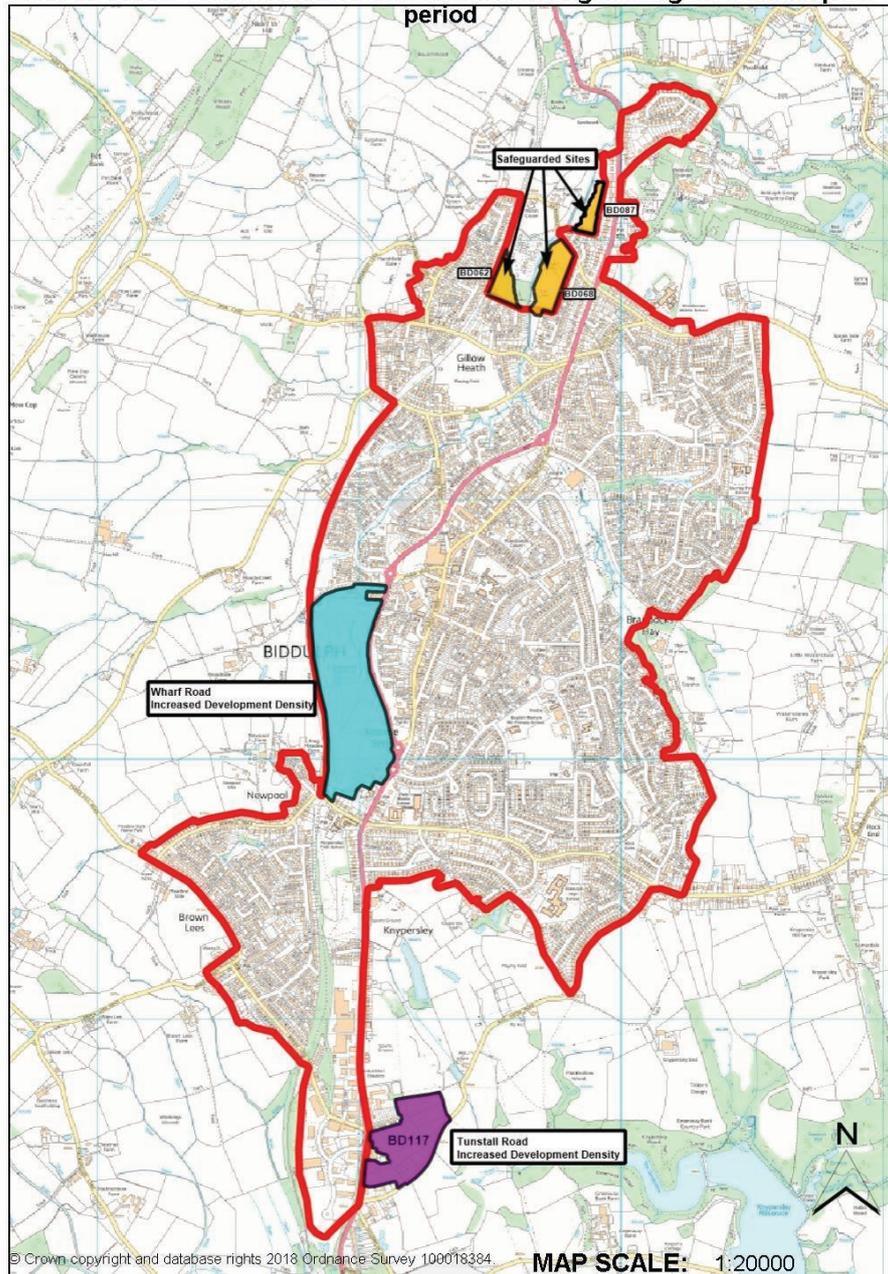
Map 5.4 Area to the north of Biddulph at Gillow Heath

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



Map 5.5 Area south of Brook Street, west of Brown Lees Road

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



Map 5.6 Option 5

