

Statement concerning consideration of options for Biddulph, including safeguarded land

Please find below my statement for the Planning Inspector which details the key points I will be raising. I look forward to attending on 4th February 2020.

Professional background: Mrs Angie Turner BSc MSc (PhD candidate)

My qualifications in this matter include over 20 years working within the field of Sustainable Development:

- as part of the local Government planning team, including writing and monitoring Sustainability Appraisals and Environmental Impact Assessments
- for charities such as Staffordshire Wildlife Trust and as a lecturer at Keele University within Environment and Sustainability
- as Environmental lead on the Biddulph Neighbourhood Plan

Key points

1. The overall analysis of options for Biddulph is not robust. The Methodology applied and presented in EL10.005 to identify land to 'safeguard' in Biddulph is unsound.
2. SMDC are failing in their Duty to embed the consideration of biodiversity in policy and decision making.
3. The recent evidence base generated by the Biddulph Neighbourhood Plan is being ignored.

1. Methodology for Options analysis EL10.005

- Safeguarded land has been identified for future development beyond the plan period. All constraints on the development of these sites therefore need to be fully understood. The evidence presented to decision makers in EL10.005 does not address this adequately.
- The factors considered within the options matrix do not mirror those within the earlier local plan Sustainability Appraisal (submission document 6.5, 2018) which did include an overall assessment on a site by site basis (+ / - ranking) and included the ecological evidence base. This format should have been carried forward and taken into account within EL10.005.
- Despite generating the evidence, the detail contained within the Phase 1 Ecological surveys was totally absent from EL10.005, a failure of Duty under Section 40 of the Natural Environment and Rural Communities Act 2006.
- Sites need to be considered on a site-by-site basis – The options matrix presented in EL10.005 suggests that every site within an Option will be affected to the same extent (+ or -). Clearly this is not the case. Each site needs to be considered and ranked individually.
- The options matrix is ineffective – the factors are not detailed enough to illustrate significant differences between the Options. If a numerical value (or +/-) or a colour code were to be applied to the statements, none of the Options presented show a significant difference. Justification for the Council Officer to recommend any single Option is not supported by the evidence presented.
- The assessment terminology is inconsistent – the timescale over which the impacts are considered is inconsistently applied across the Options eg. some are considered for short / long / longer term, or a timeframe

is not applied at all. Phrases such as *'positive but uncertain'* or *'mixed and uncertain'* or *'neutral and uncertain'* are not clear in their meaning and are inconsistent in their application.

- The information provided is inconsistent and inaccurate across the Options (eg. housing numbers / distance to GP surgery / bus stop). The land use classification used for some sites is totally incorrect.
- Had the earlier Sustainability Appraisal been referenced (S.A.6.5, 2018), it would have been clear which sites had already been deemed to have ecological value.

2. Duty to conserve biodiversity

- Section 40 of the Natural Environment and Rural Communities Act 2006 places a duty on all public authorities in England and Wales to have regard, in the exercise of their functions, to the purpose of conserving biodiversity. SMDC are failing in this Duty to embed consideration of biodiversity as an integral part of policy and decision making. Despite generating an ecological evidence base, none of this is being used to guide decision making.
- Development densities have not been lowered to take known biodiversity into account -The decision to increase housing densities on Wharf Road (MM21) does not take the findings of the Phase 1 Ecological Surveys into account. None of the Master-planning exercises have even attempted to design biodiversity into their plans.
- Biodiversity is not considered in the decision to 'Safeguard' for future development site BD062 (MM12). It is estimated that 40% of the land at BD062 may be undevelopable due to known biodiversity.
- The assessment for Local Wildlife Sites by Ecus (2017) was incorrectly carried out (Evidence base 14.8 & 14.9). According to their reported methodology, it was a desk-based exercise only. LWS assessments need ground truthing at different times of the year. Despite findings within the Phase 1 Ecological Surveys, no sites have been brought forward to the Local Wildlife Partnership for further investigation.
- Despite identifying broad key ecological corridors and other green infrastructure networks within the District (Submission document 22.10, 2018), this evidence has not been used to steer development towards sites which are less valuable in this regard.
- Had the earlier Sustainability Appraisal been referenced, it would have been clear that BD062 York / Essex Drive was *'deemed to have ecological value'* (Submission documents S.A.6.3 & 6.5) and a negative effect on biodiversity on the site if it were developed. The SMDC Local Plan Phase 1 Habitat Survey (Evidence base 14.1, 2014 Site FID122) concluded *"...the site is not recommended for potential development..."* for numerous reasons, including its connection to the wider countryside and key ecological corridors. Removing this site from the Greenbelt places it at risk from future development.

3. Biddulph Neighbourhood Plan evidence base

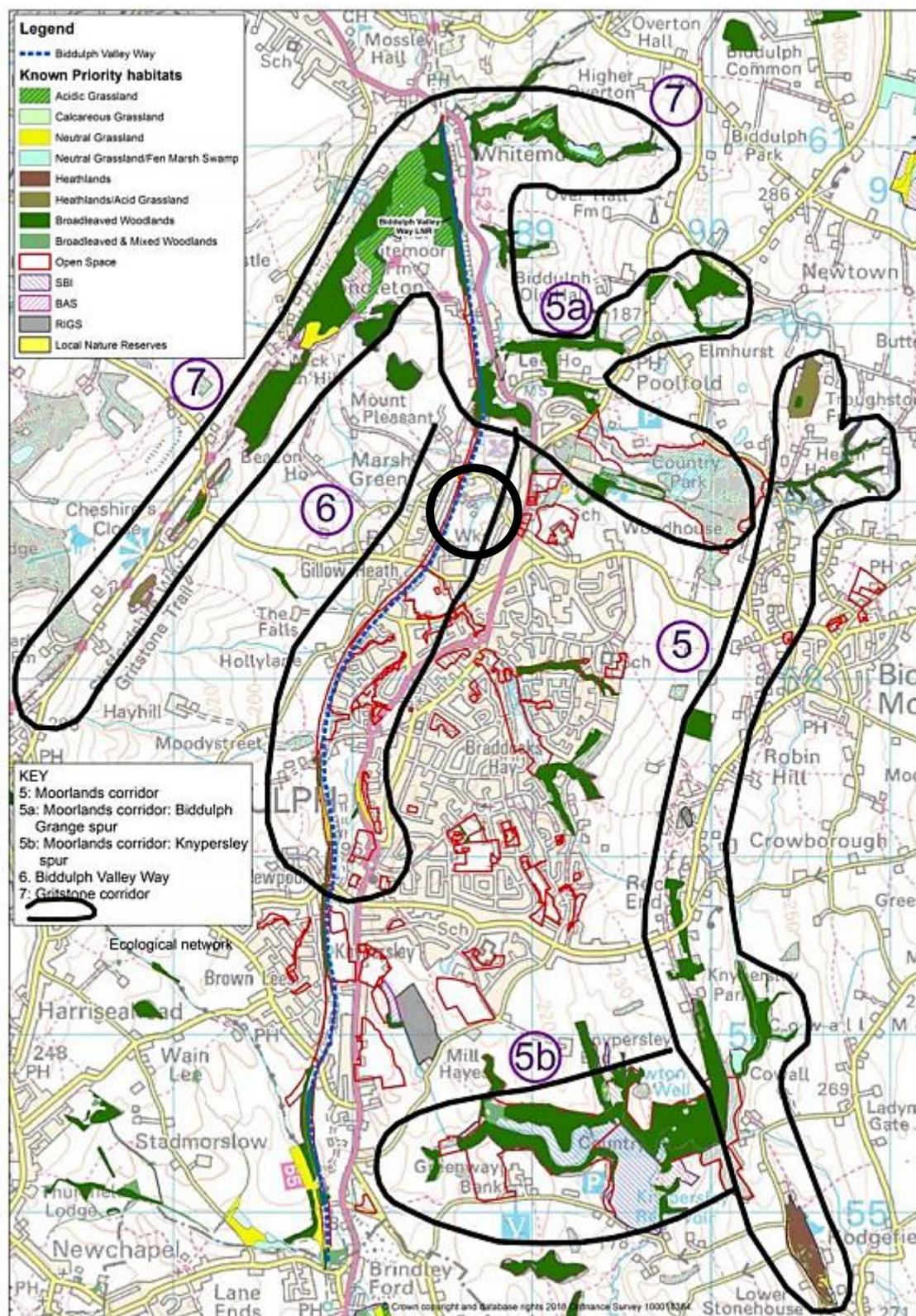
- The Neighbourhood plan chose to identify land which contained evidence of value (heritage / biodiversity / community), rather than to allocate development sites. It is not anti-development, but one of its core purposes is to direct development away from inappropriate sites by identifying land which is valuable for other purposes. This approach was supported by respondents to the Neighbourhood Plan Householder Survey.

- The ecological mapping builds on the broad ecological corridors already identified by the SMDC Green Infrastructure Strategy (Submission document 22.10, 2018) and the records held by Staffordshire Ecological Records (SER), from which baseline information is generated for the SMDC local plan.
- When compared to the rest of the District, the ecological evidence base across Biddulph Parish is lacking. Less than 10% of the land area had been covered by any form of Habitat Survey in 2017, and most of this consisted of urban development, country parks or known ancient and semi-ancient woodland. Drawing on the formal SER record for Biddulph Parish as a method of assessing the value of the landscape has always placed Biddulph at a distinct disadvantage within the SMDC Local Plan process.
- The Neighbourhood Plan Working Group sought to rectify this, bringing in external consultants to:
 - a. Build on the evidence already gathered in the SER record centre and the SMDC GI Strategy (Submission document 22.10, 2018). MAP 1 and MAP 2.
 - b. Carry out a desk-based mapping exercise to identify habitats within Biddulph Parish through aerial photographs, ground-truthing where necessary to check categories. MAP 3.
 - c. Provide guidance on the value of the mapped habitats through applying a 'Distinctiveness' category to help with prioritisation. Very high and high categories are already designated sites (coloured green). Medium value sites require ground surveys and may be eligible for LWS designation (coloured red). Budget constraints mean that this work is still required. MAP 4.
 - d. Use the above evidence to generate a detailed map showing the key ecological corridors, both terrestrial and aquatic, and how these connect to the wider landscape and other biodiverse sites. MAP 5.
 - e. Summarise the findings in a Nature Recovery Network Map to guide decision making regarding future land use and conservation opportunities in the future. MAP 6.
- The SMDC Local Plan should be using these maps to guide development away from sites shown to have either High / Very High / Medium Distinctiveness, unless timely and correctly applied Local Wildlife Site assessment shows otherwise. All such sites should be given to the Local Wildlife Partnership for consideration before any decision concerning safeguarding or future development allocations are made. Those sites which connect or border wildlife corridors should plan to use some of their site allocation to positively plan for biodiversity on site.
- Sites which have been designated as Local Greenspaces have been through numerous rounds of public consultation. BD062 (one of the sites suggested for Safeguarding) has been designated due to existing biodiversity value, unfettered public access and community use (including managing footpaths) for 40 years.
- In addition to the issue of biodiversity, Safeguarding fields in Gillow Heath for future development ignores additional submitted evidence of the following:
 - Fluvial and pluvial flooding
 - Nuisance, including noise, odour and raw sewage flooding from the sewage works
 - Poor road networks, accessed from narrow country lanes
 - Community use of the land

Please see attached maps for clarification concerning the mapping carried out for the Neighbourhood Plan.

MAP 1

The black circle shows the location of the proposed Safeguarded sites in Gillow Heath, including site BD062.



Map 7.5 Ecological corridors in and around Biddulph

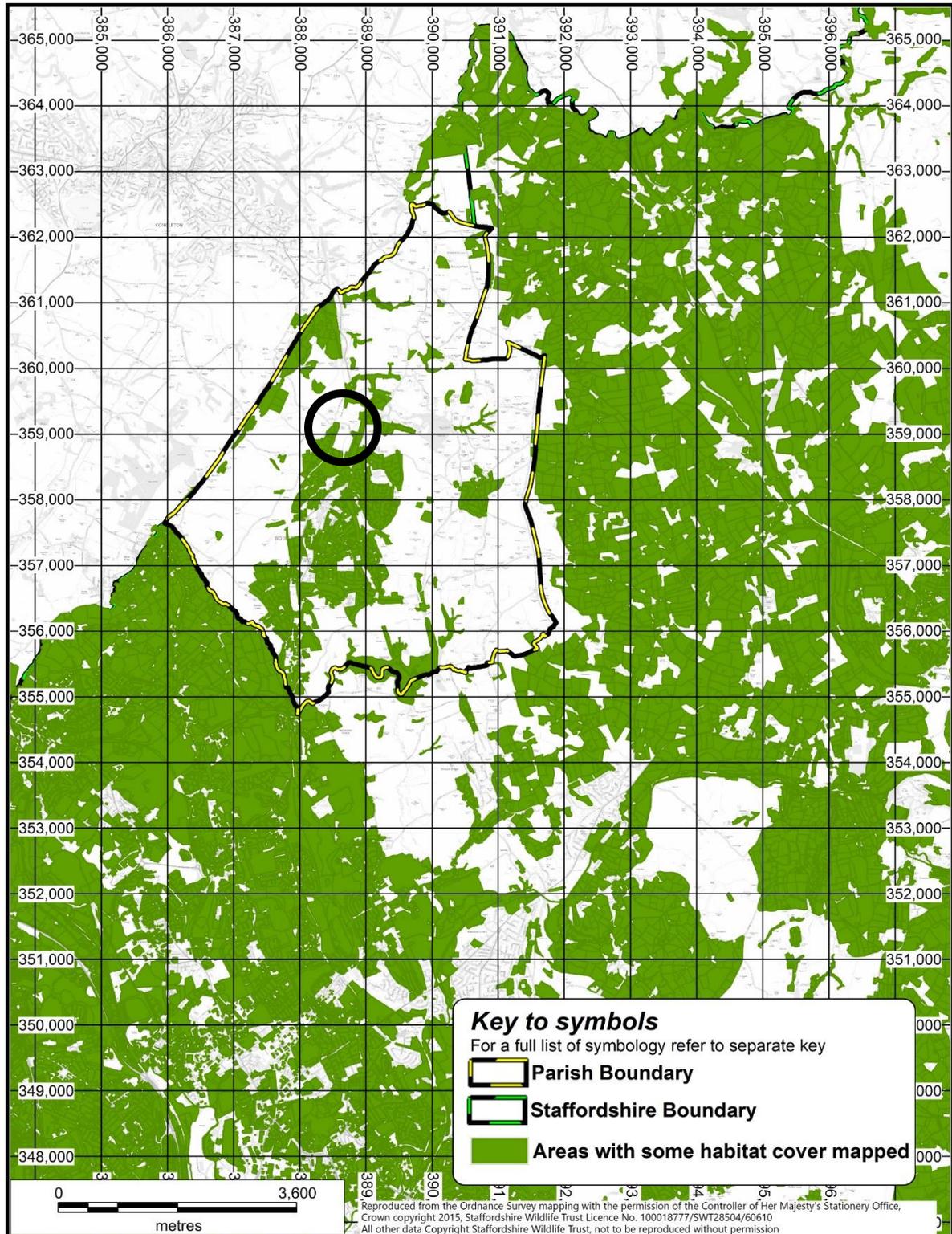
SMDC Green Infrastructure Strategy 2018 (Submission document 22.10)

The black circle shows the location of the proposed Safeguarded sites in Gillow Heath, including site BD062.

MAP 2

The Wolseley Centre, Wolseley Bridge, Stafford, ST17 0WT Tel: 01889 880100 Fax: 01880 880101
Email: info@staffs-ecology.org.uk **SER/17/010**

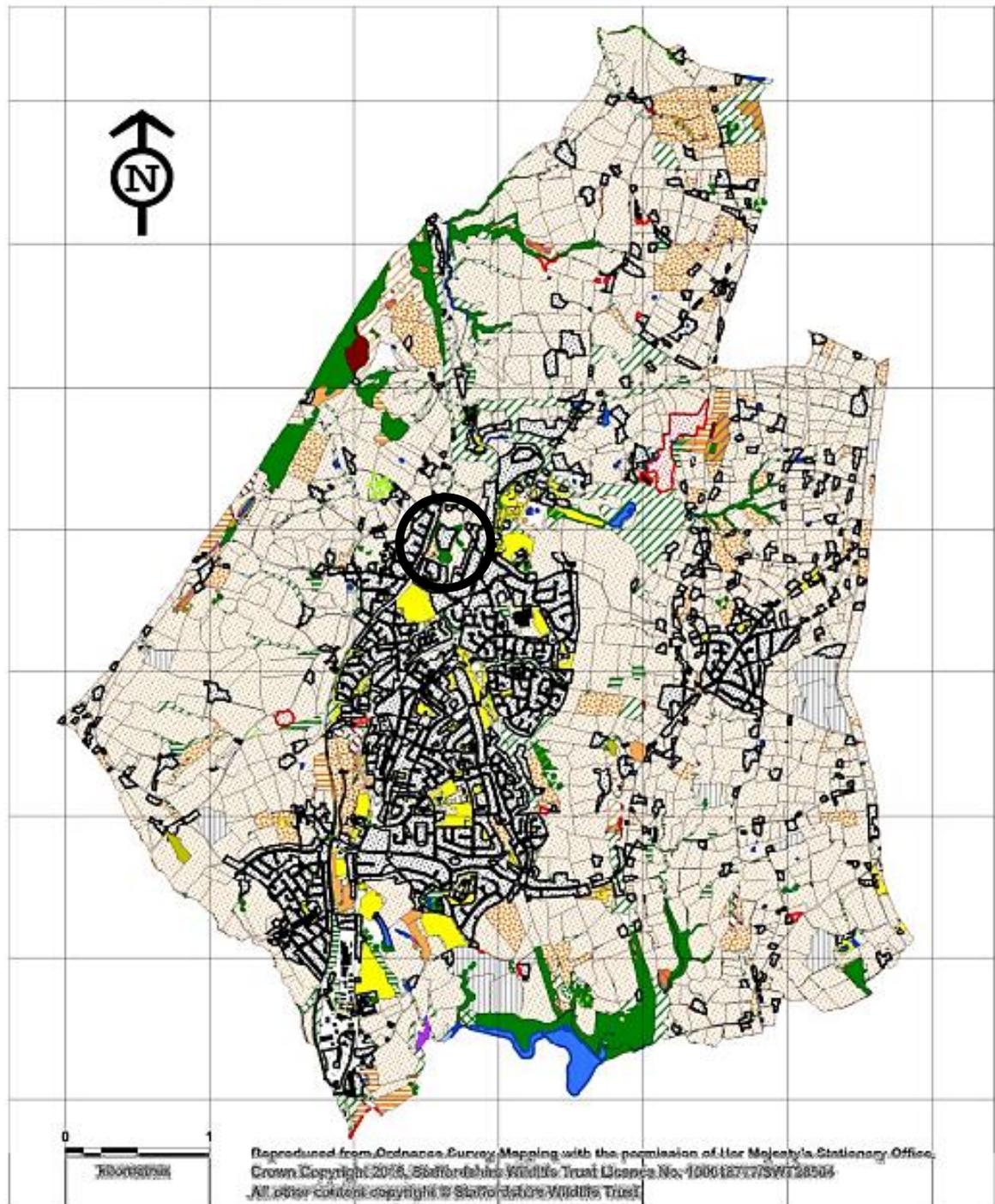
Habitats cover around Biddulph Parish (SJ85)



The black circle shows the location of the proposed Safeguarded sites in Gillow Heath, including site BD062.

MAP 3

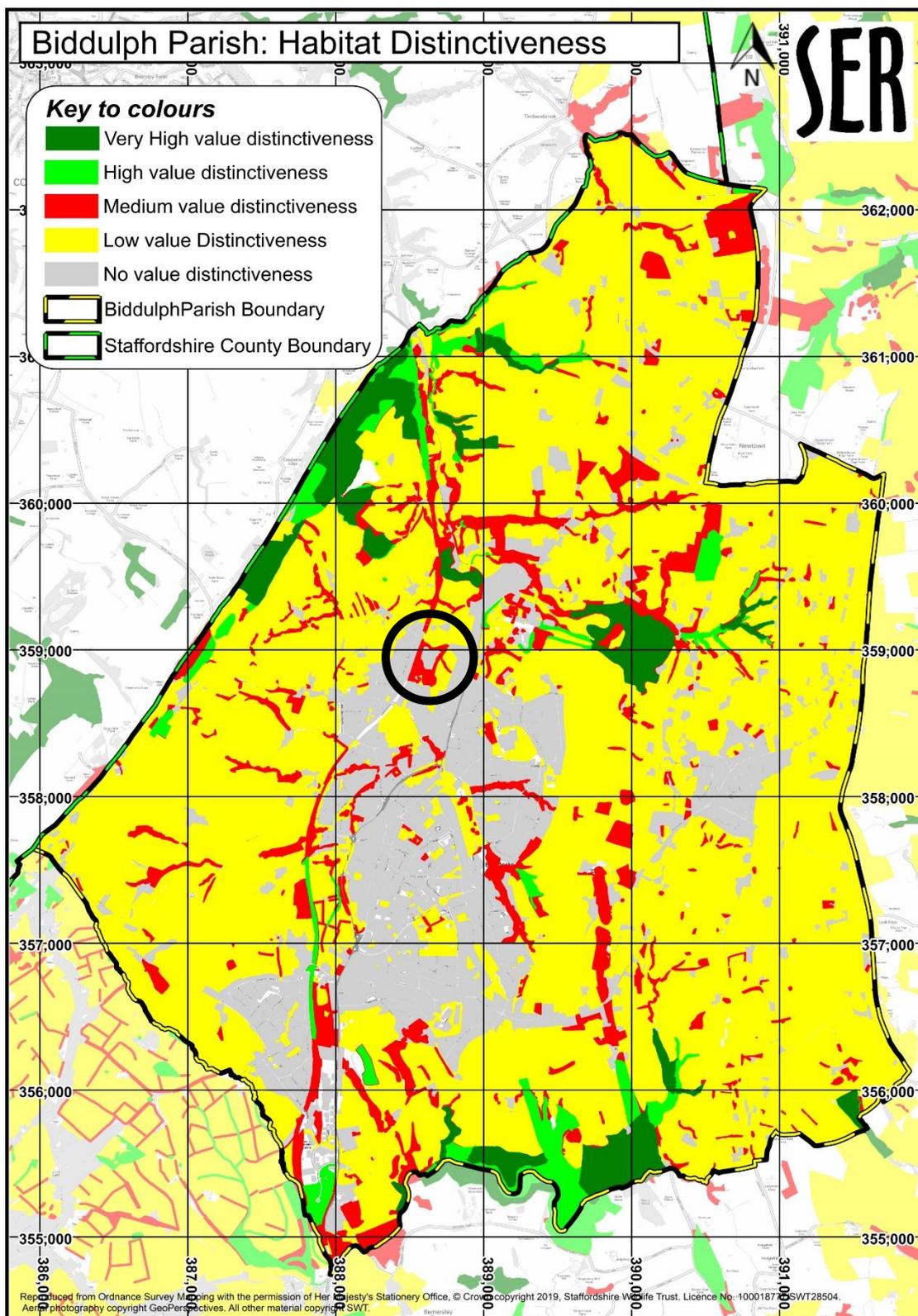
FIGURE 3 HABITAT MAP



Staffordshire Ecological Record

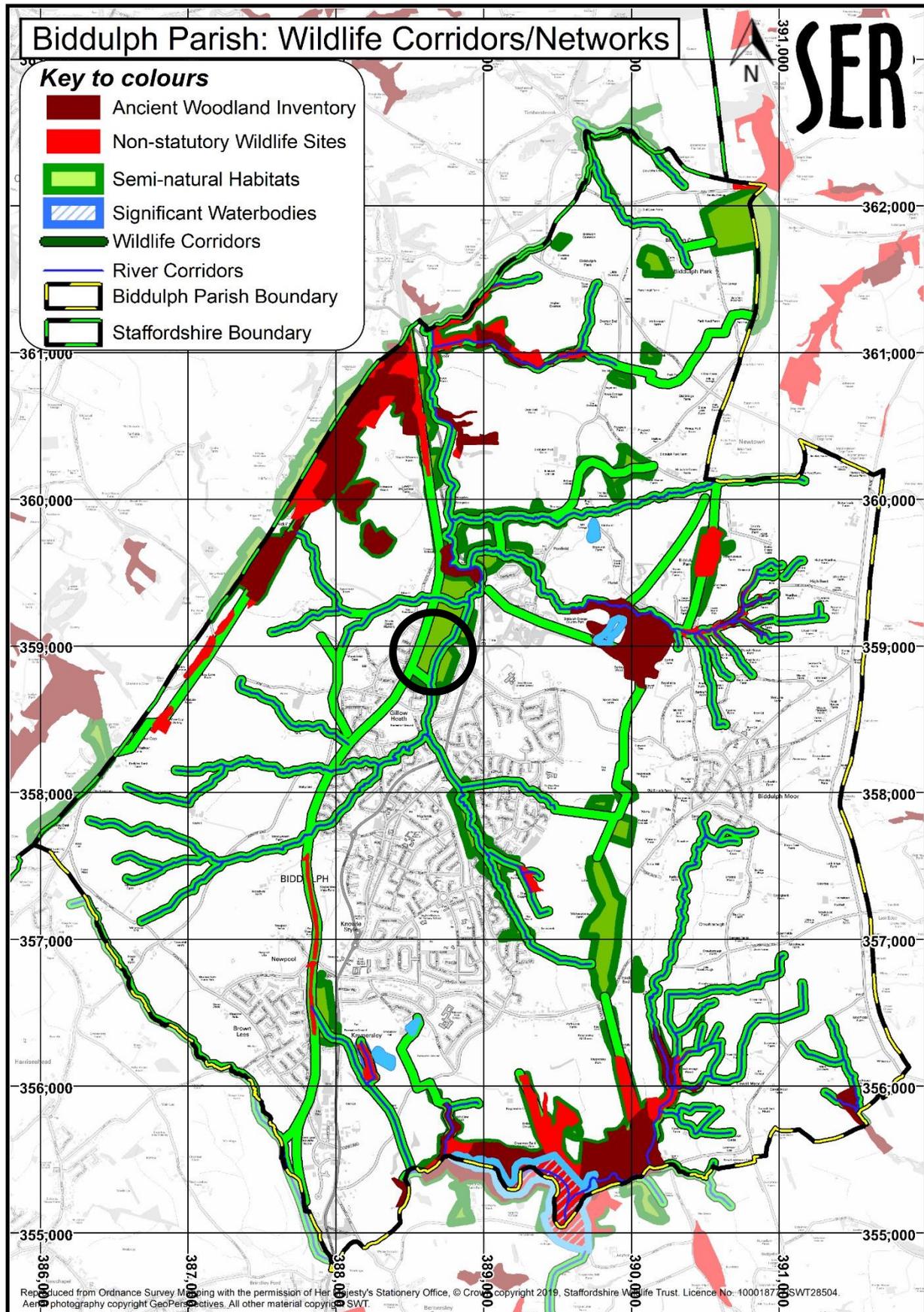
A Partnership operated by English Nature, Staffordshire County Council, Staffordshire Wildlife Trust and Stoke-on-Trent City Council

The black circle shows the location of the proposed Safeguarded sites in Gillow Heath, including site BD062.



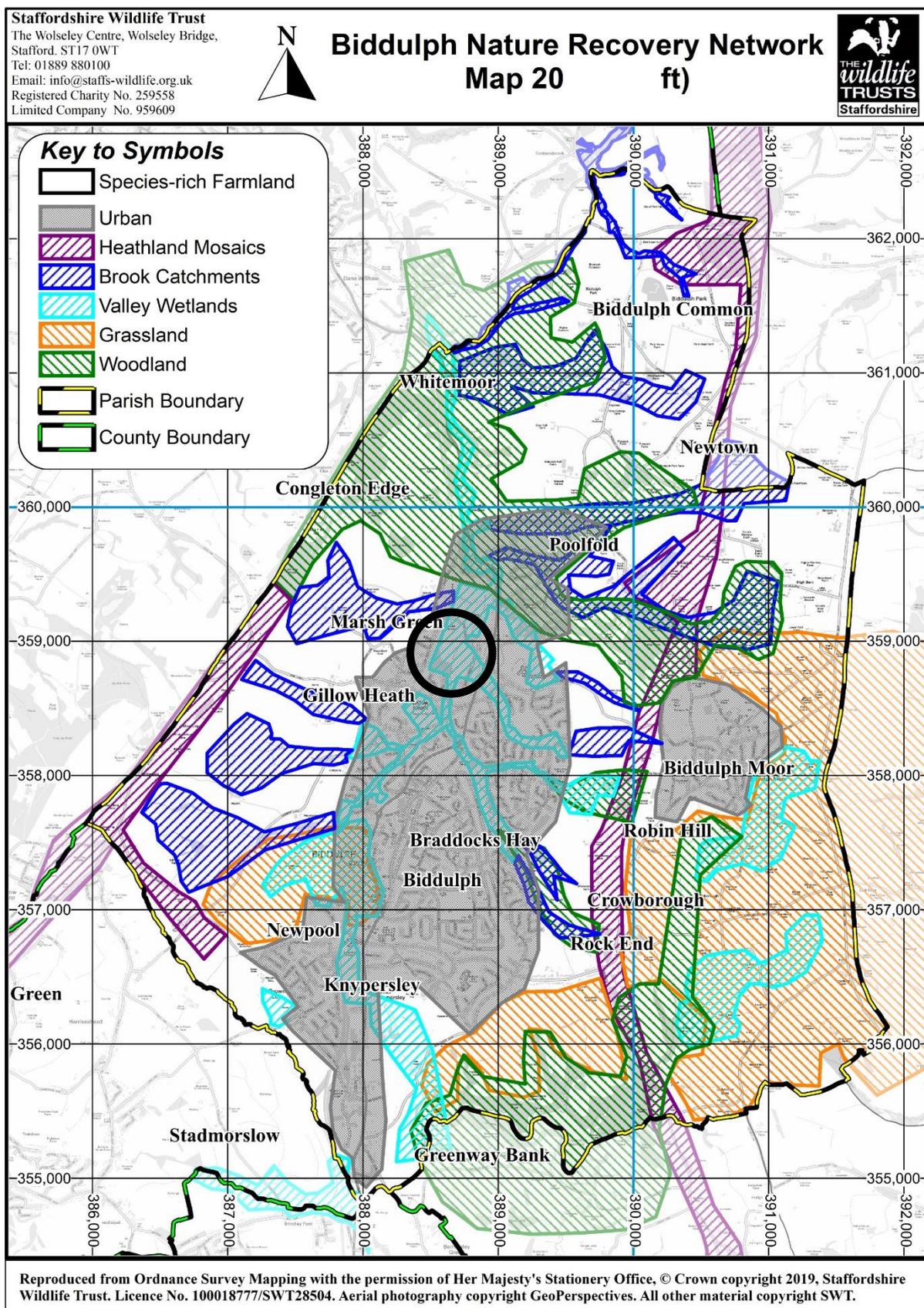
Green sites are already designated sites within the SER (country parks / ancient and semi-ancient woodland). Red sites are those which require further investigation. The majority of the red sites follow stream corridors, but a few are closer to the urban centre and therefore at increased risk of being lost to development. The black circle shows the location of the proposed Safeguarded sites in Gillow Heath, including site BD062.

MAP 5



The black circle shows the location of the proposed Safeguarded sites in Gillow Heath, including site BD062. This illustrates the key role that BD062 plays in connecting the river corridor to the terrestrial corridor of the Biddulph Valley Way, the only location where this occurs without the risk of wildlife crossing the A527.

MAP 6



The black circle shows the location of the proposed Safeguarded sites in Gillow Heath, including site BD062. This illustrates the key role that BD062 plays in connecting the wider habitats within the Parish.