

Burnett, James

From: Planning Comments (SMDC)
Subject: FW: Comment Received from Public Access

-----Original Message-----

From: planningcomments@staffsmoorlands.gov.uk [mailto:planningcomments@staffsmoorlands.gov.uk]
Sent: Tuesday, May 09, 2017 9:51 AM
To: Planning Comments (SMDC)
Subject: Comment Received from Public Access

Application Reference No. : SMD/2016/0649
Site Address: Brook Works Brook Street Biddulph Staffordshire ST8 6PF
Comments by: DAVID AND HELEN TILDESLEY

From:
17
TOWER HILL ROAD
BROWN LEES
STOKE ON TRENT
STAFFS
ST8 6PD

Submission: Objection
Comments: Mr and Mrs DP & HL Tildesley

17 Tower Hill Road

Brown Lees

Biddulph

Stoke-on-Trent

Staffs

ST8 6PD

8th May 2017

Your Ref: SMD-2016-0649

Re: Planning application for residential development on land off Brook Street/Tower Hill Road

Dear Sirs,

As local residents having lived opposite the site for over 30 years we strongly object to the proposed development for the following reasons.

The principle of development is contrary to planning policy and the proper planning of the area:

The proposed Development approach of the Core Strategy is one which focuses development on the three market towns of Leek, Cheadle and Biddulph and the larger villages, allowing for limited development for other settlements to meet local needs and targets areas in need of regeneration.

The adopted Core Strategy identifies Biddulph for development and under Policy SS5b sets out a development strategy for the area. With regard to housing, Policy SS5b seeks sites for new housing to be identified and phased through the Sites Allocation Development Plan Document (DPD) with the following broad locations and in the following priority order, depending on the need for sites to be brought forward:

- Within the Urban Area;
- Extension to the urban area to the west of the bypass (Area 4);
- Small urban extensions in the Green Belt, which will be identified as part of a comprehensive review of the Green Belt boundary around Biddulph through the sites allocations DPD and the review of the Core Strategy.

In relation to the last option, Policy SS5b specifically seeks ‘sites on land adjacent to the Urban Area shall be in locations which relate well to the urban area, can be assimilated into the landscape and would help secure infrastructure improvements for the benefit of that part of town.’

The subject site is located outside and adjacent to the identified Biddulph Area development boundary. It lies within the Green Belt and an area previously recognised as a Special Landscape Area (as designated on the Biddulph Action Area Map 2007). Whilst it is accepted that there is a future need for housing development in Biddulph, it is our concern that the development of the application site would not represent the proper planning and sustainable development of our town. We set out our reasons against the principle of developing this site below:

- As part of the ongoing process of reviewing the Core Strategy, studies and research (in particular the Landscape and Greenbelt study and the Strategic Housing Land Availability Assessment (SHLAA)) have considered Biddulph comprehensively and identified appropriate a way forward for Biddulph to meet all of its identified housing development requirements over the coming years. This includes sites within the urban area and adjacent to the urban area.
- The site is not within or well related to the urban area. The evidence clearly highlights that this site is not appropriate to form part of an extension to the urban area, is not needed to meet housing requirements at present and accordingly should remain as part of the Green Belt.
- This land plays an important role as part of the Greenbelt and contributes to the landscape character of the wider area, and most importantly we consider is not a site that ‘can be assimilated into the landscape’ (Policy SS5b).
- Neither do we consider that the site and proposal submitted ‘would help secure infrastructure improvements for the benefit of [this] part of town.’ (Policy SS5b).
- The appropriate process for determining whether Green Belt land should be lost and included as an extension to the urban area is through the review of the Core Strategy and Site Allocations DPD. The granting of planning permission for the development as proposed would be premature to this process.
- In addition the Government attaches great importance to Green Belts, with the fundamental aim of Green Belt policy to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. Paragraph 83 of the National Planning Policy Framework (NPPF) states that Local Authorities with Green Belts in their area should establish Green Belt boundaries. Once established Green Belt boundaries should only be altered in ‘exceptional circumstances’.

o As identified above, the Green Belt for Biddulph has recently been reviewed by the Authority and some changes have been suggested in order for sufficient land to be identified/allocated to accommodate the future housing need for the District. This site was not considered appropriate or needed for development. The use of this site for housing as proposed resulting in a loss of Green Belt land, would not be an 'exceptional circumstance' and is contrary to Government Policy contained in the NPPF.

In the event that the Authority does not accept our above reasoned arguments for the principle of not developing this site at this time, we raise the following comments and concerns with regard to the detail of the proposal:

The mix and type of housing proposed:

Policy SO4 requires new housing that is 'affordable, desirable, well-designed and meets the needs of residents of the Moorlands.'

Policy H1 gives further direction stating that 'new housing development should provide for a mix of housing sizes, types and tenure...' and that 'all development will be assessed to the extent to which it provides high quality sustainable housing and to which it meets identified local housing market needs and the strategy for the area having regard to the location of the development, the characteristics of the site and the economics of provision.'

The Policy requires that 'proposals for 10 dwellings or more will be required to provide a mix of housing in terms of size, type and tenure on site' informed by the Strategic Housing Market Assessment such as available supply and market demand.

In the case of the application, the proposal is for 10 dwellings and under the above policies should provide for a mix of housing types, sizes and tenures, to meet identified local housing requirements. The proposed 3 to 4 bedroom detached dwellings are at total odds to what is required in our area. Page 33 of the Core Strategy outlines that one of the main challenges for Biddulph going forward is 'an identified under supply of mid-sized units such as semi-detached and terraced dwellings and also a need for more smaller apartments, and an oversupply of detached properties and a need to address the mismatch in supply between the high levels of owner occupation and low levels of social housing and private rented housing as well as a need to provide greater choice in terms of both tenure and price.'

The density, design and layout of the scheme:

Policy H1 requires 'all housing development should be at the most appropriate density compatible with the site and its location and with the character of the surrounding area. This will generally be within the range of 40 dwellings per hectare or more in or on the edge of town centres, 30 - 40 dph in other urban areas.'

The site accommodates 8,143 m² and 10 dwellings are proposed equating to a density ratio of circa. 12 dph which falls well below the requirements of Core Strategy Policy and Government Guidance, representing an inefficient and unsustainable use of land.

With regard to design and layout, Policy DC1 - Design Considerations requires all development to be 'well designed and reinforce local distinctiveness by positively contributing to and complementing the special character and heritage of the area...' In particular, new development should: be of a high quality and add value to the local area, incorporating creativity, detailing and materials appropriate to the character of the area; be designed to respect the site and its surroundings and promote a positive sense of place and identity through its scale, density, layout, siting, landscaping, character and appearance'.

The design and layout of the scheme bears no relation at all to the surrounding context, local distinctiveness, environment or character of the area. The local built context comprises small terraced type properties immediately adjacent to the site, slightly larger semi-detached properties opposite and small detached bungalows beyond. Whilst

there is some built form on part of the site, the majority is open land that contributes positively to the wider open landscape character and Green Belt land. Large 3 to 4 bedroom dwellings as proposed which are not needed (as identified above) are completely incongruous with the area and would therefore not positively contribute or complement the character of this area (contrary to Policy DC1). This is truly an abysmal scheme that has not been designed to reflect the local context and appears to have been thrown in at minimal cost for your consideration. This wholeheartedly deserves to be refused on design grounds alone.

Overall this scheme is contrary to Government and Local Planning Policy, evidence proves that the site is not suitable or appropriate or needed at this time, and it is therefore premature pending a full review of the Core Strategy. Furthermore, the design, layout, type and mix of housing falls well below the desired standards, and is contrary to Planning Policy. We request therefore that the above concerns are taken into account when considering this application and that the application is refused.

Yours sincerely

David Tildesley

Helen Tildesley

PS AS THERE IS NO PROVISION ON YOUR WEBSITE TO SUBMIT A LETTER, SHOULD THE FORMAT BE CONFUSED IN SENDING BY EMAIL, A HARD COPY WILL BE SENT. I TRUST THAT THIS WILL MEET WITH YOUR 11 MAY CLOSURE DATE.