

Staffordshire Moorland District Council
Planning Office
Moorlands House
Stockwell Street
Leek
Staffordshire
ST13 6HQ

Kathleen Mellor
24 Broomfields
Biddulph Moor
Staffordshire
ST8 7JJ

31st March, 2026

FORMAL OBJECTION TO: Permission in Principle Application Ref SMD/2026/0099

Proposed Development: Seven New Dwellings at Land off Farmside Lane,
Biddulph Moor

Site Address: Land South of Farmside Lane, Biddulph Moor,
Staffordshire.

Dear Sir or Madam,

I am writing to lodge a formal objection to the above Permission in Principle (PiP) application, submitted on behalf of Jay Ashall Partnership, seeking approval for the erection of multiple new residential dwellings on land South of Farmside Lane, Biddulph Moor, Staffordshire.

I am an owner-occupier of 24 Broomfields Biddulph Moor, which is located immediately opposite the application site. I have a direct and material interest in the outcome of this application and am significantly affected by the proposals. I object to this application in the strongest possible terms. My objections are set out below and I respectfully urge the Local Planning Authority (LPA) to refuse Permission in Principle. I am conscious that the assessment criteria at Stage 1 Permission in Principle application are limited solely to location, land use, and the amount of development hence my objections will primarily focus on these areas, while also briefly summarising several broader concerns.

This seems to be a highly speculative and hastily prepared application that, in several areas, appears to position supposition as facts, without presenting any tangible evidence to support those assertions. In other areas, a somewhat narrow view of reality is presented, or errors are evident – for example Biddulph Moor only has one local shop, not the two that are referenced in Paragraph 5.8 of the Permission in Principle application. I also note that Paragraph 4.4 of the application refers to the “National Planning Policy Framework 2004”; surprising NPPF was first introduced and published on 27th March 2012.

It is also disappointing that such limited time has been afforded to meaningful consultation with, and comment from, relevant stakeholders such as impacted parties, the general public and elected bodies such as Biddulph Town Council. It should also be noted that no “site notices” have been placed on or near the proposed development site; whilst I believe this is not a statutory requirement when neighbouring properties have been contacted directly, it does not seem to meet the ‘wider community engagement’ aims of the Staffordshire Moorlands Statement of Community Involvement (April 2016) where paragraph 5.5 states “Regardless of size or location the Council will always encourage applicants to engage with neighbours and the wider community”.

The community of Biddulph Moor has, throughout its history, been characterised as being distinctively self-contained and independent — qualities that are almost certainly a product of the physical isolation of the moorland setting and the demanding conditions it imposed on those who chose to live there. The scattered settlement pattern, the difficulty of movement in winter weather, and the self-sufficiency required of moorland farming families combined to produce a community that relied heavily on its own resources and developed strong internal bonds of mutual support.

The moorland setting that defines Biddulph Moor is now valued as much for its recreational and environmental significance as for its agricultural and industrial functions. The open moorland, managed as rough grazing and increasingly as a habitat for moorland birds and plants, is accessible to walkers on a network of footpaths and bridleways that connect the village to the wider landscape of the Staffordshire Moorlands. The views from the higher ground on a clear day remain as dramatic as they have always been — the same panoramic prospect that greeted the families who first established farmsteads on this hillside centuries ago.

This Permission in Principle application, relates to the intent to build 7 properties on untouched, open, greenbelt land that falls outside of the development boundary of Biddulph Moor. This land was once designated a 'Special Landscape Area' by a Staffordshire Moorlands Visual Open Space Assessment, which also stated that "the landscape setting is important to the village, particularly where the more open upland, characterised by drystone walls and lack of trees, contrasts with the stronger vegetational pattern along streamlines and the environs of the historic parkland". This importance of such spaces to residents was further reinforced by the householder questionnaire undertaken in preparation of the 2023 Biddulph Neighbourhood Plan - over 98% of respondents stated that 'the rural surroundings' were what they most liked about living in the Neighbourhood Plan area. The plan then noted the following:

"The strongest theme running through the questionnaire analysis is the importance of the rural positioning of the town and the green spaces that surround it and are within it. Consequently, the protection of these areas is one of the most important concepts within this document."

To undertake property development in the proposed location would be a direct attack on a feature that defines Biddulph Moor and would be at odds with one of the most important concepts of the neighbourhood plan, and the view of most residents. Inappropriate development of the greenbelt, such as this, would harm openness and rural character and has the potential to set a precedent for future incremental encroachment into the greenbelt. It fills me with dread that the open rural character of Biddulph Moor could be irrevocably changed if expansion into protected greenbelt is permitted.

It should also be noted that, if approved, this development would also require the removal of an established countryside hedgerow of over 20m in length, which borders agricultural land, and might be protected under the auspices of The Hedgerows Regulations (1997).

Specific areas of objection in relation to the proposed proposal are outlined below:

- Paragraph 2.3 and 5.6 of the Permission in Principle application state that the proposal “forms an ideal opportunity for rounding off the existing settlement and built form of Biddulph Moor”. I disagree with this assertion since the proposed development would be a stand-alone development, unique in design, and located in farmland beyond the development boundary of Biddulph Moor. It would not be the development of a small, vacant gap, or underutilized plot, between existing built-up frontages; nor would it be natural, “limited” infill that respects the established character, density, and scale of the surrounding built environment. This would not meet the requirements of Policy HOU2 outlined in the 2023 Biddulph Neighbourhood Plan, or paragraph 154 of the NPPF and should therefore be rejected.
- Paragraph 5.7 of the Permission in Principle application explores the need to plan for sustainable travel. I do not believe that the proposed development site can effectively meet the requirements of paragraphs 109-115 of the NPPF. Biddulph Moor has limited services and even fewer employment opportunities. As such, any new residents would likely need to travel beyond the boundaries of the village for employment, recreation and to access services. Whilst there is a bus service, the timings of the services do not lend themselves to being of significant value to commuters. That nature of the village, and the roads leading to it, do not lend themselves to safe travel outside of the village by foot or by bicycle. If approved, this proposal would inevitably lead to a notable increase in car journeys and traffic – increasing congestion and the associated risk to road users whilst also further harming the environment. This development would also likely cause detrimental impact to a number of the Critical Road Junctions detailed in Policy INF1, as outlined in the 2023 Biddulph Neighbourhood Plan.
- Paragraph 5.13 of the Permission in Principle application states that “As there is built form surrounding the site, the proposals would not significantly visually extend built form any further into the Green Belt and the new built form would be read in the context of the backdrop of the existing dwellings in the area. As such, it would not appear incongruous or as projecting built form into the surrounding countryside”. This could not be further from the truth. The proposed development would be a stand-alone development, unique in design, and located in farmland beyond the development boundary of Biddulph Moor. There would be no ‘built form surrounding the site’ – the site would stand in isolation between a farm and fields. I fail to see how a standalone development such as the one being proposed could ever fail to appear incongruous; the plan associated to paragraph 5.5 also clearly illustrates that the development, if approved, would absolutely be “projecting built form into the surrounding countryside”, impacting on the openness and character of the area.
- Paragraph 5.13 of the application also states that “the new built form would be read in the context of the backdrop of the existing dwellings in the area”. I struggle to give this statement any credence since paragraph 6.1 states “an indicative site layout has been provided with the application for illustrative purposes” and paragraph 6.6 states that “The applicant would be willing to put forward the development for self-build custom housing”. This application could be for the 7 dormer bungalows that have been illustrated, for several ‘self-build custom houses’ or seemingly anything in between. On that basis, I think it is misleading to suggest that “the new built form would be read in the context of the backdrop of the existing dwellings in the area” since the ‘built form’ remains undefined.

- Paragraph 5.14 of the application states that “Most importantly, the site is not isolated and is in a location where other residential development is essentially located”. This, again, is not accurate. The proposed development, if built, would be outside of the development boundary of Biddulph Moor and would still be a stand-alone development, facing property within the sitting boundary, but sitting isolated between farm buildings on one side and open land on the other two sides.
- Policy H1, outlined in the Staffordshire Moorlands Local Plan, states that “All development will be assessed according to the extent to which it provides for high quality, sustainable housing and to which it meets identified housing needs” – there is no identified housing need in Biddulph Moor, with several houses and bungalows (8 at the time of writing) generally being available on the open market to suit a wide range of demographics.
- The proposed development site falls within an area designated as Green Belt. This is not disputed in the Permission in Principle application, and is supported by paragraphs 2.2, 5.3, 5.4, 5.12 and 5.13 of the application. Indeed, paragraph 5.4 states “As it exists, the proposed development does not fall within the criteria for appropriate development in the Green Belt”. To develop this land would conflict with numerous sections of the NPPF (e.g. 142, 143, 145, 146). The NPPF (paragraphs 143-144) states that inappropriate development is harmful to the Green Belt and should not be approved except in very special circumstances. These will not exist unless the potential harm to the Green Belt is clearly outweighed by other considerations. Paragraph 144 of the NPPF requires that local planning authorities ensure that substantial weight is given to any harm to the Green Belt.
- The land in question is indisputably Green Belt and is undeveloped open countryside. It is not land that has been previously developed or land that could be considered low quality. This land has been considered for development as part of the 2015 Staffordshire Moorlands Green Belt Study and the 2016 Staffordshire Moorlands Green Belt Review – in both instances the recommendations, shown below, were that the land should not be released for development.

Taken from “Appendix C: Settlement and Site Appraisals” of the 2015 Staffordshire Moorlands Green Belt Study” document:

Green Belt Purpose	BM021
Check Sprawl	Contribution
Maintain Separation	Limited Contribution
Prevent Encroachment	Significant Contribution
Preserve Setting	Significant Contribution
Overall impact of development on Green Belt purposes and openness	Significant A set of sites which individually and collectively would have a significant impact on the openness of the Green Belt, being part of the land identified in the LCA as making a contribution to the setting of the settlement. There are weak or nonexistent outer boundaries which would not provide long-term containment of development.
Recommendation for Green Belt boundary revision	Not Recommended for Release

Taken from “Additional Site Appraisals, September 2016” document:

Green Belt Purpose	BM7 Land off Farmside Lane opposite Broomfields
Check Sprawl	Significant Contribution - in this location, the land helps to protect against extension of the built edge of Biddulph Moor into open countryside.
Maintain Separation	Limited Contribution – no clear role in this location.
Prevent Encroachment	Contribution – part of open countryside to the southeast of Biddulph Moor.
Preserve Setting	Contribution – part of the southeasterly setting of Biddulph Moor (as viewed from Top Road).
Overall impact of development on Green Belt purposes and openness	The unbounded character of this site and its strong visual Relationship with the wider countryside means that there would be a significant impact on openness.
Recommendation for Green Belt boundary revision	Not recommended for release due to the impact on the openness of the Green Belt in this location and the unbounded Southeastern edge of the site.

- Paragraph 147 of the NPPF requires that, “Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development”. There is no evidence that this work has been undertaken.
- Paragraphs 155(a) and 155(b) of the NPPF do apply to this proposed development, rendering it inappropriate.
- Paragraph 7.2 of the application states “this statement has indicated how at this stage there are no other technical considerations which would indicate that planning permission should not be granted”. I disagree – I believe the statement to be supposition; no tangible evidence has been presented to support the application or to demonstrate that there are no other relevant technical considerations.
- The Staffordshire Moorlands Local Plan outlines 3 local strategic development sites at Wharf Road (policy DSB1), Yarn Mill and Minster Mill (policy DSB2) and Tunstall Road (policy DSB3). Together, these 3 projects would deliver in the region of 600 new dwellings without requiring any development in greenbelt land and affording occupants with a wide range of local facilities that could be easily accessed using sustainable travel methods. It therefore seems wholly inappropriate to be planning 7 dwellings in greenbelt land when an incredibly substantial number could be delivered, in more appropriate locations, if these 3 projects were brought to fruition.
- On 26th March, The Planning Applications Committee rejected a similar Permission in Principle application (SMD/2025/0537). Whilst the applications are not identical, the principles used to make the decision on SMD/2025/0537 are applicable to this application and, on that basis, this application should also be rejected.

SUMMARY OF BROADER CONCERNS				
No compelling planning need identified for this location.	Potentially inadequate existing community infrastructure.	Precedent of approval could support future attacks on the greenbelt.	Potentially increased flooding risk.	Potential limitations to drainage capacity.
Potential limitations in village water, electricity supply and drainage capacity.	Disruption of natural end point to the existing village.	Further intrusion of lighting into the rural countryside.	Conflict with nature and wildlife.	Loss of extensive countryside outlook.
The absence of detailed plans – all that has been shared is an impression of what the outcome ' <i>might</i> ' be.	Disruption and safety concerns for, if approved, the construction phase given the location of the site and the narrow local roads leading to, and adjoining, the site.	Damage to the character of Biddulph Moor by completely blocking the view to an open greenbelt landscape.	Increased vehicular traffic from potential new residents, worsening congestion, increasing risk to road users and pedestrian and further harming the environment.	If built, there would be an increased risk of flooding because of urban soil sealing.
Will likely exacerbate the existing difficulty of finding on street parking.	Slow house sales suggest limited housing demand in Biddulph Moor.	Loss of value in existing properties.	Increased demand for oil and bottle gas deliveries leading to increased traffic.	No evidence of unmet housing need in Biddulph Moor.
Loss of privacy and daylight for adjacent or nearby neighbours.	There is no direct access to the site. If built, how would the construction phase be managed? Where would the numerous vehicles – ranging from workers' commuter vehicles to plant machinery and delivery HGVs – park?		New residents would undoubtedly be more reliant on cars - two parking spaces per dwelling does not appear adequate, particularly where 3 bedroomed properties are being proposed. Also, where are visitors expected to park, given that existing on-road parking is used to capacity already?	

Once again, and in conclusion, I respectfully urge the Local Planning Authority to refuse this Permission in Principle application.

Yours faithfully,

Kathleen Mellor