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Staffordshire Moorlands Local Plan (Submission Version)

Consultation Analysis Report

Prepared by LUC
May 2018

Project Title: Consultation Analysis Report on the Staffordshire Moorlands Local Plan (Submission Version)

Client: Staffordshire Moorlands District Council

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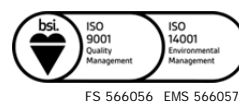
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Introduction

1 Introduction

- 1.1 Staffordshire Moorlands District Council is in the final stages of developing a new Local Plan which will guide development in the area and inform the determination of planning applications up to 2031.
- 1.2 Since 2015, the Local Plan has been subject to four rounds of public consultation:
 - **Site Options consultation:** 7th July – 14th September 2015.
 - **Preferred Options Sites and Boundaries consultation:** 28th April – 13th June 2016.
 - **The Local Plan Preferred Options consultation:** 31st July – 22nd September 2017.
 - **The Local Plan Submission Version consultation:** 27th February – 11th April 2018.
- 1.3 This Consultation Analysis Report focuses on the Local Plan Submission Version consultation. The Submission Version contains specific policy recommendations for the area. Consultation at this stage focuses on whether the Plan meets the four 'tests of soundness' and whether it is compliant with relevant legislation.
- 1.4 The report provides:
 - An overview of the Local Plan Submission Version consultation process (**Chapter 2**).
 - A summary of the representations received on the soundness and legal compliance of the Plan (**Chapter 3**).
- 1.5 **Appendix 1** provides a summary of each comment received on the Plan.
- 1.6 **Appendix 2** is a list of statutory consultees and other stakeholder organisations consulted.
- 1.7 **Appendix 3** contains the consultation material used for the Submission Version consultation.

2

Overview of the Local Plan Submission Version consultation

2 Overview of the Local Plan Submission Version consultation

Statement of Community Involvement

- 2.1 The Council's Statement of Community Involvement (SCI) was adopted in April 2016. It outlines who should be consulted at each stage of Local Plan production and the methods that will be used to ensure effective involvement.
- 2.2 For the Regulation 19 (Submission Version) stage, Figure 4.1 on page 36 of the SCI lists the consultation requirements. The table below shows these requirements and explains how they have been met as part of the Submission Version consultation.

Table 2.1: SCI requirements and how they have been met

Type of Consultee	SCI Requirements	How they have been met
Statutory Bodies	Summary document, publication on online portal, direct notification, response form, website.	All of the statutory bodies are on the Council's Local Plan Consultation Database so they were directly notified about publication of the Local Plan and associated documents. The other requirements listed were all undertaken as part of the consultation.
Parish / Town Councils	Summary document, publication on online portal, media releases, paper based, direct notification, response form.	All of the Parish and Town Councils are on the Council's Local Plan Consultation Database so they were directly notified about publication of the Submission Version document. The other requirements listed were all undertaken as part of the consultation. Paper copies of the consultation material were available at all libraries and Council offices in the District. Progress on the Local Plan is a standing item at the Parish Assembly meeting (to which all Parish and Town Councils in the District are invited) and officers attend to give updates and answer queries.
General Public	Summary document, publication on online portal, media releases, paper based, direct notification, response form, social media, website.	If they had previously commented or registered an interest (and so they were on the Local Plan database) they were sent an additional communication to notify them of the publication. A summary document was produced in order to help people understand the proposals. The other requirements listed were all undertaken as part of the consultation. Press releases, the Council's website and social media were also used to raise awareness of the consultation.
Local Businesses	Summary document, publication on online portal, Moorlands Together Partnership,	If they had previously commented or registered an interest (and so they were on the Local Plan database) they were sent an additional communication to notify them of the

Type of Consultee	SCI Requirements	How they have been met
	media releases, paper based, direct notification, response form, social media, website.	publication. The Council attended a scheduled meeting of the Moorlands Together Partnership to highlight the plan and invite representations. The other requirements listed were all undertaken as part of the consultation.
Hard to Reach Groups	Same as general public plus and availability of documents in alternative formats.	Refer to 'General Public' section above. In addition to this, large print versions of the full consultation document and the summary consultation document to be made available on request.
Developer / Landowner / Agent	Summary document, publication on online portal, media releases, paper based, direct notification, response form, social media, website	The Council's Local Plan consultation database includes a number of developers, landowners and agents who are active in the area so many were informed through this mechanism. All the other methods listed were also used to raise awareness of the consultation. Meetings (where appropriate) have been ongoing throughout the process.

Publication of the Submission Version consultation

Invitation to comment on the Submission Version Local Plan

- 2.3 The consultation process ran for six weeks (27th February to 11th April 2018). The Council invited 12,894 contacts on the consultation database to submit representations (8,997 letters and 3,897 emails).

Consultation methods

- 2.4 Individuals and organisations were invited to comment on the Local Plan via the following methods:
- Online comments via the consultation portal
 - Paper forms
 - Letter
 - Email

General Data Protection Regulation

- 2.5 In order to comply with the new General Data Protection Regulation (2016/679), each respondent was contacted by the Council to ask whether they were happy for SMDC to store and use their personal data.

Level of response

- 2.6 A total of 559 representations were received to the consultation. Of these, 8 were received late after the consultation period deadline. The level of response to the Submission Version Local Plan is summarised below:
- A total of 65 comments were received via the online consultation portal.
 - A total of 404 comments were received via paper forms and letters.
 - A total of 90 comments were received via email.

3

Summary of the representations

3 Summary of the representations

- 3.1 This chapter provides a summary of the responses to the Submission Version consultation. This is set out in **Table 3.1**, which also indicates respondents' views on whether the Plan is legally compliant, sound and complies with the Duty to Co-operate.
- 3.2 **Appendix 1** summarises individual comments and the Council's response to them. To protect personal information, each individual/organisation that commented on the consultation document was given a unique 'Consultee ID' via the Council's consultation database. Comments made via email, letter and paper forms were recorded manually on the online consultation database.

Table 3.1: Summary of responses to the consultation

Consultation point	Legally Compliant			Sound			Complies with the Duty to Co-operate			Summary of responses
	Yes	No	Not Indicated	Yes	No	Not Indicated	Yes	No	Not Indicated	
1 Introduction and Background ¹	2	5	4	1	6	4	1	3	7	<ul style="list-style-type: none"> Residents' views have not been considered by SMDC. It would have been better had SMDC asked residents where they would like the housing to go at the start of the process. There is a lack of constraint on future developments in towns and villages. The references made throughout the Plan to the Core Strategy are confusing because the Core Strategy will be superseded by the Local Plan. Concern over the proximity of housing on the Mount to the wind turbine. An objection to development of Site EN128. National Grid and Derbyshire County Council stated that they had no comments to make regarding the Submission Version Plan.
Paragraph 1.1	0	2	0	0	2	0	0	0	2	<ul style="list-style-type: none"> The plan period should be extended by at least 4 years (i.e. to 2035) to ensure that it plans for a full 15 year horizon on adoption. Given that the end date of the Plan is March 2031, it would only plan for 12 years or less from adoption.
Paragraph 1.2	1	0	1	1	0	1	0	2	0	<ul style="list-style-type: none"> Due to Wharf Road Strategic Development Area being added after the initial consultations, full co-operation did not take place. Building housing to the west of the disused railway is

¹ Some of the comments left against this chapter were more general comments made about the Plan as a whole.

Consultation point	Legally Compliant			Sound			Complies with the Duty to Co-operate			Summary of responses
	Yes	No	Not Indicated	Yes	No	Not Indicated	Yes	No	Not Indicated	
										not in line with Green Belt policy. <ul style="list-style-type: none"> One respondent promoted the development of two acres of land at Abbot's Haye.
Paragraph 1.6	0	1	0	0	1	0	0	0	1	<ul style="list-style-type: none"> The consultation process was confusing and bogus.
Paragraph 1.27	0	1	3	1	3	0	0	0	4	<ul style="list-style-type: none"> The Plan is unsound due to the proposed development at Site EN128. The Staffordshire Wildlife Trust expressed concern over the fact that a number of designated Wildlife Sites are allocated for development. They also expressed concern over the impact development will have on small-scale corridor features not identified in the Green Infrastructure Strategy. Lastly, they stated that it is unclear how the Plan has identified suitable indicators for monitoring biodiversity in the Plan.
Paragraph 1.30	0	0	1	0	0	1	0	0	1	<ul style="list-style-type: none"> Support expressed for self-build and custom housebuilding.
Paragraph 1.35	0	0	2	0	2	0	0	0	2	<ul style="list-style-type: none"> The development of Site EN128 is not in accordance with outcomes 1 and 3 of the Sustainable Community Strategy. No details are provided of the Sustainable Community Strategy's intention. The sentence that 'Children and young people' is an outcome of the Sustainable Community Strategy is meaningless.
Paragraph 1.38	0	0	1	0	1	0	0	0	1	<ul style="list-style-type: none"> Aims 1 and 4 of the Corporate Plan cannot be achieved through the development of Site EN128.

Consultation point	Legally Compliant			Sound			Complies with the Duty to Co-operate			Summary of responses
	Yes	No	Not Indicated	Yes	No	Not Indicated	Yes	No	Not Indicated	
Paragraph 1.39	0	0	3	0	3	0	0	0	3	<ul style="list-style-type: none"> The development of Site EN128 will not achieve the aims of the Council's Corporate Plan.
Paragraph 1.42	0	2	3	0	3	2	0	3	2	<ul style="list-style-type: none"> The Plan is not compliant with the Duty to Co-operate. Unclear whether SMDC has worked with neighbouring authorities to ensure the housing requirement is met in full. Staffordshire County Council (SCC) stated that they had been working closely with SMDC on the Plan and will continue to do so through its delivery. They are broadly supportive of the Plan.
Paragraph 1.45	0	0	1	0	0	1	0	0	1	<ul style="list-style-type: none"> The Peak District National Park Authority (PDNPA) welcomes this paragraph.
Paragraph 1.46	0	1	0	0	1	0	0	1	0	<ul style="list-style-type: none"> SMDC has not complied with the Duty to Co-operate because no safety risk assessments were carried out with SCC on the footpaths within Staffordshire Moorlands.
Paragraph 1.48	1	0	0	1	0	0	1	0	0	<ul style="list-style-type: none"> Natural England notes that with regard to the HRA, their previous advice which highlighted the need to assess in-combination effects was carried out and included within the Plan. They agree with the HRA conclusions that the Local Plan policies either alone or in-combination will not result in an adverse effect on the integrity of any of the European sites.
3 A Portrait of Staffordshire Moorlands	0	0	1	0	0	1	0	1	0	<ul style="list-style-type: none"> The PDNPA said that it is essential that SMDC show what geographical area the Plan covers. As such, the map on page 20 of the Plan could usefully show the

Consultation point		Legally Compliant			Sound			Complies with the Duty to Co-operate			Summary of responses
		Yes	No	Not Indicated	Yes	No	Not Indicated	Yes	No	Not Indicated	
											boundary of the Peak District National Park Authority so that readers are aware that some parts of Staffordshire Moorlands are overseen by the PDNPA.
Paragraph 3.18		0	0	1	0	1	0	0	0	1	<ul style="list-style-type: none"> The first sentence of this paragraph is a good aim. However, it cannot be achieved by developing housing on Site EN128.
4 The Challenges	‘Creating healthy, sustainable communities’ box	0	0	3	0	3	0	0	0	3	<ul style="list-style-type: none"> Bullet points 1 and 3 cannot be achieved through the development of Site EN128 due to inadequate infrastructure. For example, there is only one GP surgery in the village of Endon and the three schools in the village are oversubscribed.
	‘Tackling climate change’ box	0	0	4	0	4	0	0	0	4	<ul style="list-style-type: none"> Concern expressed over the development of Site EN128 which is susceptible to flooding.
	‘Making travel more sustainable’ box	0	0	1	0	1	0	0	0	1	<ul style="list-style-type: none"> Reference is made to addressing poor public transport, particularly in rural areas. Yet at the time of writing subsidies for public transport have been cut and services reduced. This contradicts the
5 The Vision	Chapter 5 in general	0	0	2	0	1	1	0	0	2	<ul style="list-style-type: none"> Stafford Borough Council is generally supportive of the Vision. Clarity requested on what is meant by the market towns being a focus of the Moorlands.
	‘Vision for Cheadle’ box	0	0	2	0	1	1	0	0	2	<ul style="list-style-type: none"> Recognition of the town as a focus for housing and employment growth. Support for the provision of housing to the north and south of the town. Greater emphasis could be placed not only on

Consultation point		Legally Compliant			Sound			Complies with the Duty to Co-operate			Summary of responses
		Yes	No	Not Indicated	Yes	No	Not Indicated	Yes	No	Not Indicated	
											concentrating growth in Cheadle but also in Leek and Biddulph.
	'Vision for Leek' box	0	0	1	1	0	0	0	0	1	<ul style="list-style-type: none"> Support expressed for the development of LE066, LE128a&b and LE140.
Paragraph 5.2		0	0	1	0	0	1	0	0	1	<ul style="list-style-type: none"> United Utilities seek to work closely with the Council during the remainder of the Local Plan process so as to develop a coordinated approach for delivering sustainable growth in sustainable locations.
Paragraph 5.3		1	0	0	1	0	0	1	0	0	<ul style="list-style-type: none"> Support expressed for the 'Vision for Cheadle' – particularly the aim of creating a development cluster to the south of the town.
6 Aims and Objectives	Chapter 6 in general	0	0	1	0	0	1	0	0	1	<ul style="list-style-type: none"> Stafford Borough Council expressed support for the aims and objectives of the Plan.
	'Spatial Aims' box	0	1	0	0	1	0	0	1	0	<ul style="list-style-type: none"> SMDC are non-compliant with SA2 with respect to dangerous footpaths, junctions, low cost housing and the Alton Parish boundaries.
	'Spatial Objectives' box	1	3	7	1	7	3	1	2	8	<ul style="list-style-type: none"> Suggestion of some additions to this box regarding safe footpath access to local amenities and the identification of high risk infrastructure areas, with the intention to reduce these risks. With regard to SO2, Site EN128 is susceptible to flooding and its development would be non-compliant with this objective. Staffordshire County Council, made the point that SO2 is contrary to Policy SS 1a and the NPPF (specifically Paragraph 168). As such, SO2 should be reworded (see Comment LPS224).

Consultation point		Legally Compliant			Sound			Complies with the Duty to Co-operate			Summary of responses
		Yes	No	Not Indicated	Yes	No	Not Indicated	Yes	No	Not Indicated	
											<ul style="list-style-type: none"> • With regard to SO4, the Blythe Vale development contradicts this objective. The Blythe Vale development will require people to cross a dangerous dual-carriageway. • With regard to SO5, it should be reworded to emphasise the importance of concentrating development at Biddulph, Leek and Cheadle (see Comment LPS352) • With regard to SO6, the development of Site EN128 would be non-compliant with this objective. • The Plan does not tackle the requirements of sustainable development in rural areas. • With regard to SO7, the Theatres Trust welcomes the Plan's support for and protection of community and cultural facilities as articulated through this objective. • With regard to SO9, Site EN128 is the only green space in Endon and its development would have an adverse effect on the character and distinctiveness of the countryside, as well as biodiversity. It would be non-compliant with SO9. • With regard to SO10, Site EN128 would make Brookfield Avenue even more dangerous than it currently is. • Staffordshire County Council expressed support for SO10, as well as the Plan's general references to health and the provision of health facilities. They state, however, that the Plan does not really cover the wider determinants of health and the specific role

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											<p>the Plan policies can play in relation to the health of local residents.</p> <ul style="list-style-type: none"> With regard to SO11, Staffordshire County Council is generally supportive of this objective.
Paragraph 6.2		1	0	0	0	1	0	1	0	0	<ul style="list-style-type: none"> This paragraph does not contain any information regarding the protection of Green Belt and related national policy.
7 Spatial Strategy and Strategic Policies		0	0	1	0	0	1	0	0	1	<ul style="list-style-type: none"> Stafford Borough Council is generally supportive of the Spatial Strategy and Strategic Policies.
Policy SS 1		0	0	4	0	2	2	0	0	4	<ul style="list-style-type: none"> Subject to entering into a Statement of Common Ground, Staffordshire County Council supports this policy. They note how they have been working closely with SMDC to ensure the impacts on education infrastructure as a result of new housing proposals are understood. Support expressed for this policy with regard to the promotion of a mix of types and tenure of residential development that reinforces the character of the area. Bullet point 5 of this policy cannot be achieved through the development of Site EN128. The inclusion of a bullet point regarding a positively prepared Plan would help boost housing supply across the District.
Policy SS 1a		0	0	1	0	0	1	0	0	1	<ul style="list-style-type: none"> Support expressed for this policy but no specific reason given.
Policy SS 2		5	3	5	3	6	4	5	0	8	<ul style="list-style-type: none"> Support expressed for the identification of Leek, Cheadle and Biddulph as towns where future growth

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										<p>is to be focussed.</p> <ul style="list-style-type: none"> • Consideration should be given to whether sites within Other Rural Areas can contribute positively to the wider strategy for growth of the three main towns. • Support expressed for the role small villages play in meeting the development requirements of the District • Support for the removal of village boundaries to encourage small-scale development sites to come forward as appropriate. • One respondent objected to the removal of village boundaries. • Concern expressed regarding the identification of Leekbrook as a smaller village. Indeed Policy SS 2 states that only limited development will take place in the smaller villages. The respondent suggested that Leekbrook should be treated as part of Leek in terms of the Spatial Strategy. • The policy could be reworded to facilitate growth in larger villages. This would assist in securing the long term vitality and viability of the rural areas. • Support for the fact that Biddulph is identified as a larger village. • The lack of housing allocated to Biddulph Moor is inconsistent with Policy SS 2.
Paragraph 7.21	0	0	1	0	0	1	0	0	1	<ul style="list-style-type: none"> • Due to low land values and developer profit margins, the Plan does not need to set out a clear and certain strategy for addressing the significant shortfall in affordable housing provision. This should be

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										addressed by allocating sites where there is clarity at allocation stage that these sites can deliver high levels of affordable housing
Paragraph 7.22	0	0	1	0	0	1	0	0	1	<ul style="list-style-type: none"> No objection to the target of 320 new homes per annum during the plan period.
Paragraph 7.23	0	0	1	0	1	0	0	0	1	<ul style="list-style-type: none"> It is very unlikely that the target of 320 homes per year will be achieved, based on historic rates of delivery.
Paragraph 7.24	1	0	0	0	1	0	1	0	0	<ul style="list-style-type: none"> With regard to the final sentence, it does not say what the Council will do if there is a shortfall in housing numbers.
Paragraph 7.28	0	0	1	0	1	0	0	0	1	<ul style="list-style-type: none"> The strategy to reduce the share of housing to be allocated to the Rural Areas from 28% to 25%, as well as identifying the Green Belt as a significant constraint to delivering housing in the Rural Areas, fails to acknowledge that some release of Green Belt land can satisfy the purposes of Green Belt.
Policy SS3	5	14	13	2	24	6	5	2	25	<ul style="list-style-type: none"> Questions over the allocation of housing and employment development between the three towns (particularly Cheadle) and the Rural Areas. Concern over reduction in housing in the Larger Villages. Support expressed for the amount of housing apportioned to the Rural Areas. Policy will not be effective in providing affordable housing. Unclear why the Council is proposing to adopt a housing requirement that is below the upper figure

Consultation point	Legally Compliant			Sound			Complies with the Duty to Co-operate			Summary of responses
	Yes	No	Not Indicated	Yes	No	Not Indicated	Yes	No	Not Indicated	
										<p>identified in the SHMA update (320 not 330).</p> <ul style="list-style-type: none"> • Lack of compliance with the Core Strategy, Churnet Valley Masterplan and Neighbourhood Plans. • The Plan is not positively prepared because it fails to meet the objectively assessed development and infrastructure requirements. Furthermore there is a very high level of previously unmet housing need arising from a failure to meet past requirements. • Housing numbers are excessive. In 2016, SMDC ignored the official 2012 Office for National Statistics Sun-National Population Projections, which projected a reduced and levelling off of the population across the Moorlands. • Blythe Vale is not part of the settlement for residential dwellings and is classified as B1 & B2 use land. • SMDC are ignoring local residents' objections to the uncontrolled expansion of villages. • General support expressed for this policy.
Table 7.1 (Policy SS 3)	0	1	0	0	1	0	0	0	1	<ul style="list-style-type: none"> • The views of local residents have not been considered. • The Plan lacks compliance with the Core Strategy, Churnet Valley Masterplan and Neighbourhood Plans.
Paragraph 7.29	0	0	1	0	0	1	0	0	1	<ul style="list-style-type: none"> • United Utilities stated that a fuller understanding of the impact of water and wastewater infrastructure can only be achieved once more details are known, such as the timescales for development, the approach to surface water management and the

Consultation point	Legally Compliant			Sound			Complies with the Duty to Co-operate			Summary of responses
	Yes	No	Not Indicated	Yes	No	Not Indicated	Yes	No	Not Indicated	
										chosen points of connection to the public sewerage system and mains water supply.
Table 7.2	0	2	0	0	2	0	0	0	2	<ul style="list-style-type: none"> The allowance for 100 dwellings in the Peak District National Park is not justified. This is because no schedule of sites appears to be present within the evidence base supporting the Plan, including the SHLAA. Furthermore, relying upon such provision to meet the trajectory would conflict with Sections 61 & 62 of the 1995 Environment Act. The Peak District National Park Authority Core Strategy does not allocate sites or set an overall housing target to be achieved over the plan period due to potential harm to the National Park this would cause.
Paragraph 7.33	0	0	1	0	0	1	0	0	1	<ul style="list-style-type: none"> The Council has not been able to demonstrate a 5 year housing land supply for some time, and its delivery performance is very poor. According to the NPPF, districts that have not consistently been able to demonstrate a 5 year housing land supply should include an additional buffer requirement of 20%. The draft NPPF also maintains this. As such, the housing requirement in the Plan should be increased to include a 20% buffer and a 10% slippage allowance.
Table 7.4	0	1	0	0	1	0	0	0	1	<ul style="list-style-type: none"> The District-wide employment completions over 5 years amount to 2.39ha, suggesting a rate of 0.48ha/year. As such, there is no sound basis for the predicted requirement of 1.76ha/year over the

Consultation point	Legally Compliant			Sound			Complies with the Duty to Co-operate			Summary of responses
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										remaining 14 years of the plan period.
Policy SS 4	9	9	14	2	24	6	9	1	22	<ul style="list-style-type: none"> No evidence has been provided to justify the omission of the 10% slippage allowance. Moreover, a 20% buffer would be appropriate given the persistent under-delivery of housing in the area. The Council has a deliverable supply of 1.99 years which is below the minimum requirement of 5 years. The provision of 980 houses in Leek would not meet the overall net need identified in the town of 1,015 units. Concern expressed over windfall/small site allowances. For example, the number of dwellings to be provided in Cheadle through the small sites allowance (10 dwellings per annum) is not considered realistic or justified by the evidence. Furthermore, half of the housing in the Rural Areas is to be achieved on windfall sites. This reliance on windfall/small site allowances could result in an uncertain housing delivery The evidence base provides no assessment of the level of demolitions likely to take place throughout the plan period, which should be factored into the amount of land that needs to be allocated moving forward. The housing distributed to Cheadle and the Rural Areas represents a 6% change to that in the adopted Core Strategy. As a consequence, there is a reduction in the gross requirement for housing in the

Consultation point	Legally Compliant			Sound			Complies with the Duty to Co-operate			Summary of responses
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										<p>Rural Areas of 180 units and an increase in the distribution to Cheadle of 180 units. This lowers the amount of housing coming forward in the Rural Areas, which is contrary to the spatial vision of the Plan. This policy is also inconsistent with Policy SS 2 which states that the Larger Villages are the most sustainable settlements in the Rural Areas.</p> <ul style="list-style-type: none"> Concern expressed over the reliance on the three towns and Blythe Vale for housing provision. This policy indicates proposed housing figures for broad areas in the District instead of particular locations, contrary to Paragraph 50 (bullet point 2) of the NPPF. Two of the 31 respondents were in support of the policy.
Table 7.7 (Policy SS 4)	1	0	0	0	1	0	1	0	0	<ul style="list-style-type: none"> The net housing requirement listed for Cheadle will not be met by the proposed residential development sites. For the Plan to be positively prepared, justified and effective the housing requirement for Cheadle should be re-examined.
Paragraph 7.40	0	1	0	0	1	0	0	0	1	<ul style="list-style-type: none"> The area strategies for the three towns fail to acknowledge the changing retail sector (e.g. loss of the High Street).
Policy SS 5	0	1	4	1	2	2	0	1	4	<ul style="list-style-type: none"> Development of the Mount is not in accordance with bullet points 4 and 6 in section 1 of the policy. Historic England stated that although amendments have been made in line with their advice during earlier development stages of the Plan, some have

Consultation point	Legally Compliant			Sound			Complies with the Duty to Co-operate			Summary of responses
	Yes	No	Not Indicated	Yes	No	Not Indicated	Yes	No	Not Indicated	
										<p>not. They support section 4 of Policy SS 5 but suggest that reference should be made to the setting of heritage assets.</p> <ul style="list-style-type: none"> According to Historic England, the 'Landscape, Green Space and Heritage Impact Study' notes the need for additional heritage assessment work. If this work has not yet been carried out, it should be included as a policy for Leek. Two of the five comments received were in support of the strategy.
Policy SS 6	0	1	4	0	3	2	0	0	5	<ul style="list-style-type: none"> Staffordshire County Council stated that the proposed housing growth in Biddulph could be accommodated through expansion to existing schools. The Council need to ensure that sufficient housing can be brought forward during the entire plan period. Policy SS 6 does not provide for a range of sites of different sizes in Biddulph, contrary to Paragraph 69 of the draft NPPF. Concern expressed over the Council's reliance on the two large mixed-use allocations in Biddulph, which is contrary to the emerging Site Allocations DPD which proposes the release of a number of small sites around the edge of the town.
Paragraph 7.53	0	0	1	0	0	1	0	0	1	<ul style="list-style-type: none"> Staffordshire County Council supports the allocation of land to the north of Cheadle for a school.
Paragraph 7.54	1	0	1	0	2	0	1	0	1	<ul style="list-style-type: none"> Both comments highlighted the importance of identifying whether a new link road would be viable and reduce congestion issues in Cheadle

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Policy SS 7	1	6	2	1	7	1	1	2	6	<ul style="list-style-type: none"> Concern expressed over infrastructure (the road network) and the fact that Cheadle Town Centre is not considered a shopping destination. Housing development should not take place until these issues have been resolved. Two of the nine comments were in support of the strategy – specifically the allocation of new housing to the south of Cheadle, on a good transportation route.
Paragraph 7.59	0	0	1	0	1	0	0	0	1	<ul style="list-style-type: none"> Development of Site EN128 is inappropriate and not in accordance with the first sentence of this paragraph.
Policy SS 8	3	4	7	2	9	3	3	0	11	<ul style="list-style-type: none"> Concern expressed over the insufficient amount of housing distributed to the larger villages – namely Cheddleton, Biddulph Moor, Upper Tean and Brown Edge. Indeed approximately half of the housing in the Rural Areas is to be achieved on windfall sites. Concern expressed over the inclusion of Site EN128 in Endon because its development would be contrary to bullet point 1 under section 2 of this policy (protecting community facilities). Related to the above point is the fact that community facilities would not be easily accessible from the Blythe Vale development on the edge of Blythe Bridge & Forsbrook. Historic England welcomes the reference to sensitive design to enhance the conservation area in site allocation UT109. However, the reasoning behind the

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										<p>proposed mitigation measures in the 'Landscape, Local Green Space and Heritage Impact Study' is unclear, and clarification on the character of the conservation area and design principles for conserving and enhancing it are requested.</p> <ul style="list-style-type: none"> Three of the thirteen comments received on this policy expressed support.
Policy SS 9	3	35	9	0	42	5	3	1	43	<ul style="list-style-type: none"> Many people object to the removal of village boundaries because it undermines policies contained within the Core Strategy relating to transport and the designation of small/medium/large villages, as well as the Churnet Valley Masterplan. It also makes Neighbourhood Plans in the area inoperable. The removal of village boundaries could also increase development in the Green Belt, on the edge of the smaller villages which could have an adverse effect on the character of the area. Additionally, village boundaries give people a sense of community and ownership.
Paragraph 7.69	0	0	1	0	0	1	0	0	1	<ul style="list-style-type: none"> The 2012 version of the NPPF was well established and applicable when SMDC's Core Strategy was adopted and the previous draft Plan prepared.
Policy SS 10	0	1	3	0	1	3	1	0	3	<ul style="list-style-type: none"> Development should not be restricted to essential needs in Other Rural Areas because it will have an adverse effect on rural vitality. Provision should be made in this policy for the sub-division of existing large houses. Historic England suggests the inclusion of a bullet

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	Yes	No	Not Indicated	Yes	No	Not Indicated	Yes	No	Not Indicated	
										<p>point regarding the conservation and enhancement of heritage assets.</p> <ul style="list-style-type: none"> Staffordshire County Council acknowledges the extra care housing recommendation for the Anzio Camp. However, they state that due to its isolated location, extra care housing may not support the independent living model in relation to accessibility to services and amenities.
Policy SS 11	0	1	1	0	1	1	0	0	2	<ul style="list-style-type: none"> The policy promotes tourism but does not contain measures to limit the impact tourism will have on private vehicle use and the road network. General support expressed but the policy should make clear that tourist related developments close to (but not within) the Churnet Valley are supported.
Paragraph 7.76	0	0	1	0	0	1	0	0	1	<ul style="list-style-type: none"> The Environment Agency notes that the majority of their comments from previous consultations have been incorporated into the Plan. However, in this section of the Plan ('Planning Obligations and Community Infrastructure Levy) flood risk management infrastructure should be considered for inclusion in the Infrastructure Delivery Plan.
Policy SS 12	1	1	2	0	2	2	1	1	2	<ul style="list-style-type: none"> The policy is understandably short on detail To accord with Paragraph 204 of the NPPF, the policy should not just include reference to one aspect of the government guidance on obligations but include reference to the other two aspects/tests. Cheadle Unite commented on this policy, saying that they would like to know where the money is being

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										<p>spent.</p> <ul style="list-style-type: none"> Staffordshire County Council stated that there is no requirement within the Plan to set out how the infrastructure needs of larger allocations will be delivered/funded.
Paragraph 8.9	1	0	0	1	0	0	1	0	0	<ul style="list-style-type: none"> The Coal Authority supports the reference to coal mining activity and its potential impact on surface stability.
Paragraph 8.10	0	0	1	1	0	0	0	0	1	<ul style="list-style-type: none"> From a minerals and waste perspective, Staffordshire County Council considers the Plan sound.
Policy SD 1	2	1	3	3	2	1	2	1	3	<ul style="list-style-type: none"> Natural England welcomes the inclusion of criterion 1. The Coal Authority welcomes the inclusion of criterion 3. Staffordshire County Council (SCC) welcomes the inclusion of criterion 6. One respondent expressed concern over the sequential approach introduced in criterion 1 because it is inconsistent with national policy. SCC made the point that Policy SD 1 does not cover how climate change will be addressed, particularly in new developments. Policy SD 1 could be better linked to SD 3.
Policy SD 3	0	0	3	0	1	2	0	0	3	<ul style="list-style-type: none"> SCC suggested the inclusion of a reference to decentralised renewable energy sources for large scale developments. The Council should give consideration to exemplar residential or commercial projects that deliver an energy efficient design that is zero-carbon.

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										<ul style="list-style-type: none"> No indication is provided in the policy as to what approach the Council will take where development does not provide carbon saving or water saving measures.
Paragraph 8.20	0	0	1	0	0	1	0	0	1	<ul style="list-style-type: none"> United Utilities is supportive of this paragraph but recommends the inclusion of a reference to the potential need for extra technical mitigation measure which would increase construction costs.
Paragraph 8.23	0	0	1	0	0	1	0	0	1	<ul style="list-style-type: none"> The Environment Agency states that the recommendation of an 8m buffer for main rivers and a 4m buffer for non-main rivers is a minimum, recommending a larger buffer.
Paragraph 8.24	0	0	1	0	1	0	0	0	1	<ul style="list-style-type: none"> There are a number of culverts in the immediate vicinity of Site EN128.
Paragraph 8.25	0	0	1	0	0	1	0	0	1	<ul style="list-style-type: none"> United Utilities expressed their support for this paragraph. They did, however, recommend an amendment to the paragraph so that the order of priority for surface water discharge includes reference to a highway drain.
Paragraph 8.26	0	0	1	0	0	1	0	0	1	<ul style="list-style-type: none"> United Utilities expressed their support for this paragraph.
Paragraph 8.27	0	0	3	0	0	3	0	0	3	<ul style="list-style-type: none"> SCC suggests the inclusion of a web link to the Lead Local Flood Authority page. The Environment Agency made the point that the reference to the 'Updated Flood Map for Surface Water' should be updated. United Utilities expressed their support for this paragraph.

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Policy SD 5		0	0	2	0	0	2	0	0	2	<ul style="list-style-type: none"> • SCC requests the inclusion of a reference to the SuDS handbook. • United Utilities expressed their support for this policy.
Policy E 1		0	1	1	0	1	1	0	0	2	<ul style="list-style-type: none"> • Historic England notes that the references in the policy to protecting the character or appearance of developments should include all heritage assets and their settings.
Paragraph 8.36		0	1	0	0	1	0	0	1	0	<ul style="list-style-type: none"> • The development in Cresswell is unacceptable.
Policy E 2	Omission Site	0	1	0	0	1	0	0	0	1	<ul style="list-style-type: none"> • One comment submitted regarding the omission of a residential site (land off Wardle Gardens).
Policy E 3		0	0	1	0	0	1	0	0	1	<ul style="list-style-type: none"> • This policy should be reworded in order to allow for the Council to adapt to changing circumstances over the plan period. It should be made clear that the redevelopment of a site for alternative purposes will be encouraged where an appropriate marketing campaign demonstrates that there is no market demand for continued employment use.
Policy E 4		0	0	1	0	0	1	0	0	1	<ul style="list-style-type: none"> • The respondent welcomed the policy. However, they raised concern over the emphasis placed on the proximity of sites to public transport modes because there is limited and declining public transport in Staffordshire Moorlands.
Paragraph 8.46		0	0	1	0	0	1	0	0	1	<ul style="list-style-type: none"> • Staffordshire County Council suggested replacing the reference to the elderly with 'ageing population'.
Paragraph 8.49		0	0	1	0	0	1	0	0	1	<ul style="list-style-type: none"> • Staffordshire County Council made the point that there is no supported definition for the term 'flexicare', which was a County strategy that ended in

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										2015. All references to 'flexicare' should be removed.
Policy H 1	6	4	13	1	14	8	7	1	15	<ul style="list-style-type: none"> The policy fails to provide an adequate framework for the delivery of new housing in the District, specifically within the rural areas inclusive of the larger and smaller villages. The infill boundaries should not have been removed. No definition or guidance on what constitutes infill development. Provision should be made for the sub-division of existing large houses which are out of settlement. The need for self-build and custom built homes is unclear. Historic England advise the Council to clarify that when a rural building is a heritage asset (designated or non-designated) or a site wishes to make a contribution to the setting of a heritage asset, any proposals should be considered against the relevant historic environment policy. Additionally, reference to enabling development should be removed from the Plan. The expectation that half of the housing in Rural Areas will be achieved through windfall sites demonstrates that the Plan is not positively prepared. Not clear how the needs of a parish will be met in the National Park. Flexibility could be introduced into this policy that supports the redevelopment of brownfield sites in

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											<p>Smaller Villages and facilitates windfall development.</p> <ul style="list-style-type: none"> Staffordshire County Council support parts 3(a) and 3(d) of this policy, but feel the policy could be better linked to Policy SD 3. Part 5(d) of this policy conflicts with Paragraph 55 of the NPPF and is unduly onerous. Not enough commitment in this policy to special groups.
Policy H 2	Omission Site ²	8	6	14	0	23	5	8	1	19	<ul style="list-style-type: none"> 26 out of the 28 respondents who commented on Policy H 2 with regard to omission sites, suggested the development of land previously included or not included at all in the Plan. One of the remaining two respondents expressed support for this policy whilst another reiterated its wording.
	Land at the Mount, Leek (LE066, LE128a&b, LE140, LE142a, LE142b) <u>Policy DSL 2</u>	0	0	8	1	2	5	0	0	8	<ul style="list-style-type: none"> All but 1 of the 8 respondents who commented on this policy objected to the development of the Mount. The main reason for objection was that the Mount is a recreational amenity used by many and located in close proximity to Leek. Development of the Mount would alter the character of the area, at the same time as exacerbating traffic problems.

² Omission sites have been submitted against other policies in the Local Plan. Please see the separate omission site schedule for a complete record.

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	Wharf Road Strategic Development Area (BD055, BD071, BD071a, BD106, BD156, BD076, BD076a, BD108, BD016, BD104, BDNEW). <u>Policy DSB 1</u>	0	2	7	0		5	0	0	9	<ul style="list-style-type: none"> Each of the 9 comments received against this site objected to its development. There were two recurring reasons for objection: Site BDNEW falls within the Green Belt yet the Council has not demonstrated exceptional circumstances for its development. Its development will represent urban sprawl. Site BDNEW was added at a later development stage of the Local Plan and therefore people did not have the same opportunity as they did for other sites, to object to its development.
	Tunstall Road Strategic Development Area (opposite Victoria Business Park), Biddulph	1	0	0	0	1	0	1	0	0	<ul style="list-style-type: none"> Objection to this development because the reasons given for the amendment to the Green Belt do not demonstrate exceptional circumstances.

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	(BD117) <u>Policy DSB 3</u>										
	Cheadle North Strategic Development Area (CH001 & CH132) <u>Policy DSC 1</u>	0	0	2	0	0	2	0	0	2	<ul style="list-style-type: none"> Concern expressed over this site's location because most Cheadle people shop outside of the town and are served by the A50. It therefore makes sense to develop housing towards the south and west of the town. Persimmon Homes, who submitted the representation in support of this site, provided an update on the progress of their application for the site's development (see Comment LPS484).
	Land to the rear of Froghall Road, Cheadle (CH004)	2	0	0	2	0	0	2	0	0	<ul style="list-style-type: none"> The land at Sunways will be available for development in the later development stages of the Plan.
	Stoddards Depot, Leek Road (CH015)	0	0	1	0	0	1	0	0	1	<ul style="list-style-type: none"> The policy should make clear that site clean-up costs will be high and result in tight profit margins.
	Mobberley Strategic Development Area	2	0	3	1	2	2	2	0	3	<ul style="list-style-type: none"> Concern expressed over entry points to the site, traffic in the area and flooding. SHLAA Site CH093 should be taken out of the Green Belt.

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	(CH085A, CH085B, CH085C, CH085D, CH128) <u>Policy DSC 3</u>										<ul style="list-style-type: none"> The policy should indicate that 430 dwellings at Mobberley Strategic Development Area is a minimum figure. The reasons given for the amendment to the Green Belt for this strategic development site do not represent exceptional circumstances.
	Blythe Vale, Blythe Bridge <u>Policy DSR 1</u>	0	3	3	0	4	2	0	1	5	<ul style="list-style-type: none"> Stafford Borough Council support this development as a partner authority with the Constellation Partnership regeneration initiative, provided it contributes to the wider local economy along the Major Developed Site within the Green Belt at Hadleigh Park in Stafford Borough. The Blythe Vale development and the Cresswell development are in direct conflict with each other regarding housing needs and industrial expansion. The Cresswell development has outline planning permission but is still a significant factor in the Blythe Vale application. Blythe Vale has not been identified as having the capacity for the growth of a further 300 new houses (e.g. insufficient infrastructure). Housing is overly apportioned to Blythe Vale. The Blythe Vale site adjoins the city of Stoke-on-Trent and should not count towards meeting the rural area requirement in Staffordshire Moorlands. The Blythe Vale site was not included at the start of

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											<p>the Local Plan process, do was not fully consulted on.</p> <ul style="list-style-type: none"> The land allocated in DSR 1 has previously been identified as a regional investment/strategic employment site.
	Land at corner of Brookfield Avenue / Stoney Lane, Endon (EN128)	6	0	24	1	11	18	5	0	25	<ul style="list-style-type: none"> Development of this site will exacerbate existing traffic problems on Brookfield Avenue, at school drop-off and pick-up times. A lot of concern expressed over the safety of pedestrians (including schoolchildren) because cars park on the pavements at school rush hour despite parking restrictions being put in place. In 1995, Site EN128 was designated as an area of Visual Open Space. It contributes significantly to the semi-rural character of the neighbourhood and should be retained on amenity grounds. Brookfield Avenue, the A53 and occasionally the school playing fields experience flooding. Site EN128 acts as a natural soakaway and should not be lost. Site EN128 is not located in close proximity to employment opportunities. Local services are already oversubscribed and will not be able to cope with the increase in population. Those in support of the site make the point it is located within the built-up area and boundary of Endon. It is the only proposed allocation in the village and does not require the removal of land from the Green Belt. There are three possible access points from both ends of Stoney Lane. Furthermore,

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											the site is not identified as Local Open Space and does not satisfy the criteria for Visual Open Space (a term referenced by the Environment Inspector in the mid-nineties).
	Land off Ash Bank Road, Werrington (WE003 & WE052) <u>Policy DSR 4</u>	0	0	3	0	2	1	0	0	3	<ul style="list-style-type: none"> The proximity of these sites to the prison is unsuitable on grounds of privacy and security. Concern over safe access to both sites. Homes England supports this allocation because it represents the opportunity to contribute to the Council's housing target and is located in a sustainable location.
Policy H 3		1	5	5	0	7	4	1	1	9	<ul style="list-style-type: none"> The proposed tenure split should be expressed as being indicative of the final split because there are likely to be changes to the definition of affordable housing over the lifetime of the Plan. CPRE object to section 1 of this policy because it lacks commitment to the provision of affordable housing, has an unambitious target of 33% affordable housing and the sentence starting "The actual level of provision..." is unclear and ambiguous. The affordable housing requirement of 33% should be reduced, or the policy should state that it is a maximum figure. The policy does not appear to have been subject to viability testing. The Plan fails to meet the existing backlog of affordable housing provision, and the Council has set

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										a low annual affordable housing requirement. As such, the Plan is not positively prepared.
Policy H 4	0	0	1	0	0	1	0	0	1	<ul style="list-style-type: none"> Stafford Borough Council note the need for 6 pitches by 2019 with a further 2 pitches over the plan period to 2034. However, no sites to accommodate this need have been identified.
Policy TCR 1	0	0	1	0	0	1	0	0	1	<ul style="list-style-type: none"> Historic England suggests a minor amendment to the wording in section 6 of this policy, to emphasise the conservation of the town centre's heritage.
Policy TCR 3	0	0	1	0	0	1	0	0	1	<ul style="list-style-type: none"> The requirement for an impact and sequential assessment to be undertaken when proposals for retail and other town centre uses is 200sqm should be increased to 300sqm.
Paragraph 8.78	0	0	1	0	0	1	0	0	1	<ul style="list-style-type: none"> United Utilities recommend the inclusion of a paragraph that requires new developments near existing wastewater treatment works to demonstrate an acceptable environment for the proposed use.
Paragraph 8.81	0	0	1	0	0	1	0	0	1	<ul style="list-style-type: none"> Staffordshire County Council (SCC) note how the Plan makes reference to high speed broadband.
Policy DC 1	0	0	3	0	1	2	0	0	3	<ul style="list-style-type: none"> United Utilities recommend that criterion 5 is amended so that it is clear that the amenity consideration relates to both proposed and existing properties. New developments should create healthy active environment in terms of satisfactory daylight, overbearing development, sunlight, outlook, privacy, and soft landscaping. SCC support part 11 of this policy.
Policy DC 2	0	0	3	0	0	3	0	0	3	<ul style="list-style-type: none"> SCC welcomes the wording regarding archaeology,

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										<p>and also supports section 5 of the policy.</p> <ul style="list-style-type: none"> Historic England welcomes the reference to heritage at risk but suggests minor changes to the policy wording.
Policy DC 4	0	0	1	0	0	1	0	0	1	<ul style="list-style-type: none"> Support expressed for the allocation of The Rocks (25) and High Lane (26c) as the only protected open spaces in Brown Edge.
Paragraph 8.99	0	0	2	0	2	0	0	0	2	<ul style="list-style-type: none"> The development of Site EN128 is contrary to the second sentence of this paragraph because it would put a strain on existing facilities.
Policy C 1	2	0	0	1	1	0	2	0	0	<ul style="list-style-type: none"> The Theatres Trust welcomes the Plan's support for protection of community and cultural facilities, including theatres.
Paragraph 8.105	0	0	2	0	2	0	0	0	2	<ul style="list-style-type: none"> The development of Site EN128 would place unacceptable demands on both primary and secondary schools in the area.
Policy C 2	0	0	1	0	0	1	0	0	1	<ul style="list-style-type: none"> Staffordshire County Council (SCC) is of the view that Policy C2 should exempt those sites that have already been identified and covered in the Open Space, Sports and Recreation Study.
Paragraph 8.107	0	0	2	0	2	0	0	0	2	<ul style="list-style-type: none"> Retaining Site EN128 would be in accordance with this paragraph.
Policy NE 1	1	1	1	1	0	2	1	0	2	<ul style="list-style-type: none"> Natural England welcomes the additions to this policy concerning the avoidance-mitigation-compensatory hierarchy. Part 1 of this policy should refer to sites of international rather than European significance as Ramsar (international) sites are included in Habitats

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										<p>Regulations requirements.</p> <ul style="list-style-type: none"> All sites identified as being of ecological importance must be enhanced through developments where possible.
Paragraph 8.128	0	0	1	0	0	1	0	0	1	<ul style="list-style-type: none"> Highways England welcome that all their comments from the Preferred Options consultation stage have been addressed.
Policy T 1	1	0	1	0	1	1	1	0	1	<ul style="list-style-type: none"> SCC is generally supportive of this policy. Concern raised over the fact that development which generates a significant demand for travel (or is likely to have significant transport implications) will contribute to improved public transport provision, junction improvements, traffic management and highways infrastructure.
Policy T 2	0	2	1	0	2	1	0	2	1	<ul style="list-style-type: none"> Inadequate footpaths within Staffordshire Moorlands, specifically in Alton. Concern expressed over junction between Cheadle Road, Uttoxeter Road, Slatersford Lane, Denstone Lane and Nabb Lane). SCC are generally supportive of this policy, particularly part 4.
9 Strategic Development Site Policies	1	0	1	0	1	1	1	0	1	<ul style="list-style-type: none"> Historic England notes that many of the site allocation policies in this chapter of the Plan could be improved with respect to recognising and appropriately mitigating their impact on the historic environment. Unable to ascertain the site selection process undertaken by the Council. As such, it is not possible

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										to identify the planning judgements exercised by the Council.
Policy DSL 1	0	2	1	0	2	1	0	0	3	<ul style="list-style-type: none"> • SCC supports this policy because it makes provision for a school expansion and in doing so, requires the realignment of the track running through the site to ensure that the school can be contained within a single site. • Questions over the deliverability of this site
Paragraph 9.14	0	0	1	0	1	0	0	1	0	<ul style="list-style-type: none"> • The land at the Mount supports Red List species.
Paragraph 9.15	0	0	1	0	1	0	0	1	0	<ul style="list-style-type: none"> • Developers should be forced to provide social housing, even though it will result in a reduction in their profits.
Policy DSL 2	0	3	3	1	3	2	0	3	3	<ul style="list-style-type: none"> • The Mount is an important recreational facility close to the town and used by many. • If development goes ahead, Mount Road will no longer be a quiet country land and footpath that people can walk down. • There are more sustainable alternative sites that could be developed on the western side of Leek. • The town boundary has been moved without consultation. • Questions over the deliverability of this site because it is in multiple ownership. • SCC supports the need for the submission of a landscape and visual impact assessment, as well as mitigation measures. • One comment submitted in support of this policy suggested that the policy proposes 'at least' 345

Consultation point	Legally Compliant			Sound			Complies with the Duty to Co-operate			Summary of responses
	Yes	No	Not Indicated	Yes	No	Not Indicated	Yes	No	Not Indicated	
										dwellings.
Policy DSL 3	0	2	0	0	2	0	0	0	2	<ul style="list-style-type: none"> Questions over the deliverability of this site. It is brownfield and will require remediation. Furthermore, the mixed-use development will presumably need to be cross-subsidised by residential development
Policy DSL 4	0	2	0	0	2	0	0	0	2	<ul style="list-style-type: none"> Questions over the deliverability of this site because it has been proposed for development for some time. Concern expressed over infrastructure costs related to a link road across the railway. Third party land is also required for access because the Council has confirmed that access will not be taken via Sandon Street
Paragraph 9.35	0	0	1	0	0	1	0	0	1	<ul style="list-style-type: none"> Concern that the assumed densities in Wharf Road Strategic Development Area are unrealistically high and do not reflect market signals.
Paragraph 9.36	0	0	1	0	0	1	0	0	1	<ul style="list-style-type: none"> Despite BDNEW having high landscape sensitivity, it is still proposed for development. The Green Belt Review concluded that BDNEW makes a contribution to checking sprawl, preventing encroachment, preserving setting and a limited contribution to maintaining separation. The SHLAA concluded that development in this area (previously BD140, BD140a and BD116) would not be appropriate.
Paragraph 9.39	0	0	1	0	0	1	0	0	1	<ul style="list-style-type: none"> Concern that the Council has made too optimistic assumptions about the constraints of BDNEW, namely the mining legacy and the impact of numerous misused mineshafts, the watercourse,

Consultation point	Legally Compliant			Sound			Complies with the Duty to Co-operate			Summary of responses
	Yes	No	Not Indicated	Yes	No	Not Indicated	Yes	No	Not Indicated	
										ecological constraints and topographical landscape issues.
Paragraph 9.40	0	0	2	0	0	2	0	0	2	<ul style="list-style-type: none"> United Utilities supports the inclusion of their recommended wording in this paragraph, and support the development of Wharf Road Strategic Development Area in accordance with a masterplan. Concern that the Council has made too optimistic assumptions about the constraints of BDNEW, namely the mining legacy and the impact of numerous misused mineshafts, the watercourse, ecological constraints and topographical landscape issues.
Paragraph 9.43	0	0	1	0	0	1	0	0	1	<ul style="list-style-type: none"> Concern that the Council has made too optimistic assumptions about the constraints of BDNEW, namely the mining legacy and the impact of numerous misused mineshafts, the watercourse, ecological constraints and topographical landscape issues.
Paragraph 9.45	0	0	1	0	0	1	0	0	1	<ul style="list-style-type: none"> The Green Infrastructure Study aims to protect Biddulph Valley Way. However, Biddulph Valley Way would be comprised by the creation of a new estate road access from the main strategic site to the opens fields to the west.
Paragraph 9.46	0	0	1	0	0	1	0	0	1	<ul style="list-style-type: none"> The landscape at BDNEW should not be underestimated because development of the site would have a high visual impact. The settlement edge is clearly defined. As such, development of BDNEW would represent sprawl into

Consultation point	Legally Compliant			Sound			Complies with the Duty to Co-operate			Summary of responses
	Yes	No	Not Indicated	Yes	No	Not Indicated	Yes	No	Not Indicated	
										the open countryside.
Policy DSB 1	3	3	4	1	4	5	3	0	7	<ul style="list-style-type: none"> There is no evidence to support Site BDNEW in place of other previous preferred allocations. Site BDNEW was not consulted on before the Preferred Options Plan. Historic England makes the point that the significance of the listed buildings within this site should be assessed. Questions over the deliverability of this site because it is in multiple ownerships. As such, there are complex Section 106 contributions that will need to be agreed between the Council and all landowners. The proposed quantum of development is unrealistic with regard to lead-in time and build rate. There are complex mining legacy issues associated with this site. Sites which are less damage to the Green Belt should be developed instead. The site should remain as Green Belt. No suitable and safe access to the site. Not clear whether the existing watercourse across the site can be retained or diverted. Development of the site is supported but the policy should be less restrictive so that it does not prohibit development from coming forward. The site's constraints can be addressed through mitigation so should therefore not be included within the policy wording.

Consultation point	Legally Compliant			Sound			Complies with the Duty to Co-operate			Summary of responses
	Yes	No	Not Indicated	Yes	No	Not Indicated	Yes	No	Not Indicated	
										<ul style="list-style-type: none"> United Utilities support this development, in accordance with a masterplan.
Policy DSB 3	0	2	0	0	2	0	0	0	2	<ul style="list-style-type: none"> Questions over the deliverability of this site because it is in multiple ownerships.
Policy DSC 1	0	2	1	0	2	1	0	0	3	<ul style="list-style-type: none"> Questions over the deliverability of this site because although the site is identified in the Core Strategy as a broad location for housing, it is yet to come forward. It is not clear whether the proposed developed including the new school would be viable. SCC supports this policy because it makes provision for a new county primary school and school/community playing pitches.
Paragraph 9.81	1	0	0	0	1	0	1	0	0	<ul style="list-style-type: none"> Respondent welcomes the role that Mobberley Strategic Development Area plays in the housing strategy for Cheadle. However, they state that the Plan does not maximise the potential of the sustainable location of this area through the development of Site CH093.
Paragraph 9.82	1	0	0	0	1	0	1	0	0	<ul style="list-style-type: none"> Access to Mobberley Strategic Development Area cannot be gained from some parts of the existing road network. Access to the area can only be achieved via land north of the veterinary practice which is currently in the Green Belt. Land should be taken out of the Green Belt for access to Site CH128, but not the larger site (CH093). It is illogical to take one site out of the Green Belt and not the other because the Green Belt Review

Consultation point	Legally Compliant			Sound			Complies with the Duty to Co-operate			Summary of responses
	Yes	No	Not Indicated	Yes	No	Not Indicated	Yes	No	Not Indicated	
										identifies the limited role that both sites play in the function of the Green Belt to the south west of Cheadle.
Paragraph 9.84	1	0	0	1	0	0	1	0	0	<ul style="list-style-type: none"> No objection to this paragraph except the reference to the link road.
Paragraph 9.88	1	0	0	0	1	0	1	0	0	<ul style="list-style-type: none"> The assertion that the main access to the Mobberley Strategic Housing Area will be through land owned by a third party is unjustifiable as there are viable alternatives within the ownership of the majority of the site.
Policy DSC 3	2	2	3	0	5	2	2	0	5	<ul style="list-style-type: none"> Concern that the policy is too prescriptive in the way the development should precede. It is possibly too restrictive in the number of dwellings being suggested. The suggested density is quite low. Questions over the deliverability of the site because it is in multiple ownerships. The proposed quantum of development is unrealistic having regard to the application of a realistic lead-in time and build rate. The boundary of the site should be amended to follow landscape features. Extension of the boundary would help deliver more housing. According to Historic England, the policy wording should provide clarification that the starting point for development should be to avoid harm in heritage terms, before mitigation is considered. The release

Consultation point	Legally Compliant			Sound			Complies with the Duty to Co-operate			Summary of responses
	Yes	No	Not Indicated	Yes	No	Not Indicated	Yes	No	Not Indicated	
										<p>of a small parcel of Green Belt land on CH128 would be insignificant to the wider purposes of Green Belt.</p> <ul style="list-style-type: none"> The Inspector for the Core Strategy expressed concern over the scale of development previously proposed at this site, and its relationship with a south western link road.
Paragraph 9.96	0	0	1	0	0	1	0	0	1	<ul style="list-style-type: none"> One respondent expressed support for this paragraph, specifically the reference to the Constellation Partnership.
Paragraph 9.97	0	0	1	0	0	1	0	0	1	<ul style="list-style-type: none"> Support expressed for the fact that the Blythe Bridge development has capacity to deliver housing outside the Green Belt in a sustainable and accessible location.
Policy DSR 1	0	4	3	0	4	3	0	2	5	<ul style="list-style-type: none"> Stafford Borough Council welcomes the reference to producing a masterplan. They also welcome the commitment to landscaping on the south side of the A50. This development will put too much pressure on Blythe Bridge and surrounding villages such as Hilderstone which already experience issues with large lorries travelling through on narrow roads. Concern over the disturbance this development will have to toxic waste. Concern over flooding at this site. Questions over the deliverability of this site. Significant infrastructure requirements associated with this site as it falls under multiple ownerships. Insufficient evidence that the proposed quantum of

Consultation point	Legally Compliant			Sound			Complies with the Duty to Co-operate			Summary of responses
	Yes	No	Not Indicated	Yes	No	Not Indicated	Yes	No	Not Indicated	
										<p>development is realistic.</p> <ul style="list-style-type: none"> Part of the site is an existing Regional Investment Site that should not be developments for residential purposes.
Policy DSR 2	0	0	1	0	0	1	0	0	1	<ul style="list-style-type: none"> Historic England raises a number of concerns regarding this site allocation. The Grade II* listed status of the farmhouse should be clarified within the associated text, as well as information on its setting and the level of harm development will cause to it. The policy should also clarify what information is required by the Heritage Impact Study.
10 Implementation and Monitoring	0	0	2	0	0	2	0	0	2	<ul style="list-style-type: none"> No objection to the designation of The Rocks (25) and High Lane (26c) as Local Green Space. Historic England advises the inclusion of the protection of the historic environment as a 'principal outcome'.
Table 10.1 (Implementation of Local Plan Policies)	0	0	1	0	0	1	0	0	1	<ul style="list-style-type: none"> Historic England suggest the following sentence: "Conserves and enhances the significance of heritage assets (including the contribution made to their setting) and the historic character of the area".
Paragraph 10.4	1	0	0	0	0	1	1	0	0	<ul style="list-style-type: none"> There needs to be a commitment within a defined timescale to address those policies which are not working.
Map A1.1	0	2	0	0	2	0	0	1	1	<ul style="list-style-type: none"> The site boundary of 142b is proceeding under false premises. One respondent objected to housing allocations LE066, LE128, LE140, LE142a and LE142b.

Consultation point	Legally Compliant			Sound			Complies with the Duty to Co-operate			Summary of responses
	Yes	No	Not Indicated	Yes	No	Not Indicated	Yes	No	Not Indicated	
Map A1.2	0	0	1	1	0	0	0	0	1	<ul style="list-style-type: none"> Support expressed for the proposed revisions to the Leek town boundary
Map A2.2	0	0	1	0	0	1	0	0	1	<ul style="list-style-type: none"> This map does not include the whole town centre.
Map A3.1	5	0	0	2	3	0	5	0	0	<ul style="list-style-type: none"> A request was submitted for the removal of open space zoning. One respondent's land had been incorrectly designated as Open Space. An objection was submitted to the exclusion of the remainder of SHLAA Site CH075 b/c/d in the Proposed Town Boundary. A request was submitted for the removal of SHLAA Site CH093 from the Green Belt to be included within the new town boundary. One respondent supported the amendment to the Proposed Town Boundary to encompass land south of Thorley Drive.
Map A3.2	0	0	1	0	0	1	0	0	1	<ul style="list-style-type: none"> The Proposed Town Boundary should be amended to include a small development site off Park Lane.
Map A4.1	0	1	1	0	1	1	0	1	1	<ul style="list-style-type: none"> Support expressed for the housing site at Capri. The boundary is incorrect because Ordnance Survey maps from 1841, as well as historical literature, identify Nabb Lane residents in 'The Triangle' as owners of fields which were references within the Tithe Schedule.
Map A4.2	0	1	0	0	1	0	0	0	1	<ul style="list-style-type: none"> The amount of housing to be provided within the rural area, specifically Biddulph Moor, should be increased.

Consultation point	Legally Compliant			Sound			Complies with the Duty to Co-operate			Summary of responses
	Yes	No	Not Indicated	Yes	No	Not Indicated	Yes	No	Not Indicated	
Map A4.3	2	0	0	1	1	0	1	1	0	<ul style="list-style-type: none"> One respondent requested a meeting with SMDC to discuss their land. The houses on Blythe Vale would not form part of the village of Blythe Bridge or Draycott. The site should therefore not be developed.
Map A4.4	0	0	2	0	0	2	0	0	2	<ul style="list-style-type: none"> The residents of Brown Edge would like to see written protection (namely Conservation Area status) for a field called War Moors included in the Plan. Support expressed for the village boundary. Promotion of a suitable development site in the centre of the village off Sytch Road.
Map A4.5	1	0	1	0	1	1	1	0	1	<ul style="list-style-type: none"> The Proposed Village Boundary should be extended at the southern edge of the village to support a development site. An objection to the designation of Ox Pasture (west) as a Local Green Space.
Map A4.6	1	0	0	0	1	0	1	0	0	<ul style="list-style-type: none"> One respondent marked the Plan as legally compliant and in accordance with the Duty to Co-operate here. No specific reason was given why.
Map A4.11	0	2	2	0	3	1	0	2	2	<ul style="list-style-type: none"> Two comments were not in support of the proposed development at WE003 and WE052 because it was felt that developing housing adjacent to a prison would not protect the wellbeing of local residents. The A52 will not cope with an increase in car numbers. Objection to the inclusion of land North of Cotehill Road as a Local Green Space. Objection to Big Ash Bank being washed over by

Consultation point	Legally Compliant			Sound			Complies with the Duty to Co-operate			Summary of responses
	Yes	No	Not Indicated	Yes	No	Not Indicated	Yes	No	Not Indicated	
										Green Belt.
Map A5.17	0	1	0	0	1	0	0	0	1	<ul style="list-style-type: none"> Leekbrook should be included as part of Leek in the settlement hierarchy. At a minimum, Leekbrook should be upgraded in the settlement hierarchy to a larger village.
Map A5.20	0	0	1	0	0	1	0	1	0	<ul style="list-style-type: none"> The Peak District National Park Authority commented on this map, stating that it should make clear what is meant by 'Local Plan Boundary'.
Map A5.23	0	1	0	0	1	0	0	1	0	<ul style="list-style-type: none"> An objection to the removal of the village boundary because it undermines policies contained within the Core Strategy. The removal of village boundaries could also give the green light to unsustainable and uncontrolled development in rural areas.
Map A5.27	0	1	0	0	1	0	0	1	0	<ul style="list-style-type: none"> This map received one comment from a respondent objecting to the removal of the village boundary because it undermines policies contained within the Core Strategy. The removal of village boundaries could also give the green light to unsustainable and uncontrolled development in rural areas.
Map A6.1	0	1	0	0	1	0	0	1	0	<ul style="list-style-type: none"> One respondent commented on this map, objecting to the designation of Ox Pasture (west) as a Local Green Space.
Appendix 7 – Housing Trajectory	2	2	3	0	5	2	2	0	5	<ul style="list-style-type: none"> 7 comments were received on this appendix, none of which expressed support for the trajectory. The majority of respondents expressed concern over the deliverability of the housing trajectory because the Council has a significant shortfall in their 5 year housing supply which equates to 1.99 years.

Consultation point	Legally Compliant			Sound			Complies with the Duty to Co-operate			Summary of responses
	Yes	No	Not Indicated	Yes	No	Not Indicated	Yes	No	Not Indicated	
										<ul style="list-style-type: none"> Furthermore, the trajectory does not appear to be supported by an up-to-date SHLAA Assessment, which is required by national policy to be updated annually.
Table A10.1	1	0	1	0	2	0	1	0	1	<ul style="list-style-type: none"> One respondent objected to the designation of Ox Pasture (west) as a Local Green Space. The other respondent objected to the land North of Cotehill Road as a Local Green Space.
Appendix 11 – Neighbourhood Plan housing requirement methodology	0	0	1	0	0	1	0	0	1	<ul style="list-style-type: none"> One respondent commented on this appendix, expressing their support for the allocation of 25 housing units in Brown Edge.
Table A11.5	1	0	0	0	1	0	0	1	0	<ul style="list-style-type: none"> The Peak District National Park Authority does not recognise housing requirements for settlements. Whilst the rationale for the desirable figure is understood, the PDNPA has agreed an indicative figure of delivery for the Moorlands as a whole, which may or may not be achieved in conserving and enhancing the National Park part of the Moorlands
Appendix 12 - Glossary	1	0	0	1	0	0	1	0	0	<ul style="list-style-type: none"> The Theatres Trust welcomes the definitions of community facilities and cultural facilities provided within the Glossary.

Appendix 1

Summary of individual comments and responses

Appendix 2

List of statutory consultees and other stakeholder organisations

Table A2.1: List of statutory consultees and other stakeholder organisations

List of statutory consultees and other stakeholder organisations
A T Moss & Son
ACB Hydraulics Ltd
ACERT
Action West End
Adactus
Adams Food Ingredients Ltd
ADAS
Addleshaw Goddard
Ads-Plan Ltd
Age UK
Airwave
Alliance Planning
Alstonefield Parish Council
Alton Orchard Action Group
Alton Parish Council
Alton Towers Resort Operations Ltd
Amec Foster Wheeler E&I UK
Amos Group Ltd
Anchor Trust
Ancient Monuments Society
Ann Joliffe Charity
Arc Ecology
Architectus
Archtrend Design
Arcus Consultancy Services Ltd
Armstrong Burton Planning
Arriva Midlands North Ltd
Arts Council West Midlands

List of statutory consultees and other stakeholder organisations
ASD Metal Services
Asda Stores Ltd
Ash Tree Planning
Aspire Housing Association
ASSIST
Astill Planning Consultants Ltd.
Autoline Motors
B Developments Limited
B Property Holdings Limited
Bagnall Parish Council
Bakers Coaches
Barnfield Hughes Limited
Barton Consortium
Barton Willmore
Beatrice Charity
Beech Tyldesley
Bellway Homes Limited
Berkeley and Hay Hill Estates Limited
Biddulph & District Probus Club
Biddulph CAB
Biddulph Chamber Of Trade
Biddulph Conservative Club
Biddulph East Residents Association
Biddulph Exhaust And Tyre Limited
Biddulph High School
Biddulph Library
Biddulph Methodist Church
Biddulph Neighbourhood Plan Working Group
Biddulph Police

List of statutory consultees and other stakeholder organisations
Biddulph Property Investments Limited
Biddulph Retired Persons Association
Biddulph Sports Council
Biddulph Town Council
Biddulph Townswomens Guild
Biddulph Volunteering Centre
Biddulph, Congleton, Leek & District MS
Bilfinger /GVA
Birmingham Roman Catholic Diocesan Trustees Registered
BIS West Midlands
Black Lion Public House
Blackbrook Zoological Park
Bloor Homes
Blore With Swinscoe Parish Meeting
Bluemantle Ltd
Bosley Parish Council
Bovale Limited
Bovis Homes Limited
Boyer Planning
Brackenwood Studios
Bradnop Parish Council
Brighter Futures
Brindley Mill Trust
Britannia Building Society
British Astronomical Association
British Horse Society
British Telecommunications PLC
Brooke Smith Planning
Brown Edge Parish Council

List of statutory consultees and other stakeholder organisations
Brown End Farm Cycle Hire
Building Research Establishment
Bury & Hilton
Business Initiative
Butters John Bee
Butterton Parish Council
Buxton and Leek College
Byatt Oliver Associates
Byways And Bridleways Trust
Cable & Wireless
Cadent
Caldon & Uttoxeter Canals Trust
CAMRA
Canal & River Trust
Cannock Chase District Council
Caverswall Parish Council
Central Networks
Cerda Planning Ltd
Chatsworth Estate
Cheadle And District Homelink
Cheadle Business Group
Cheadle Business Group and Cheadle Tourism Group
Cheadle Civic Heritage Trust
Cheadle Primary
Cheadle SE
Cheadle Sports Council
Cheadle Town Council
Cheadle Unite
Checkley Parish Council

List of statutory consultees and other stakeholder organisations
Checkley Village Awareness Committee
Cheddleton Estates Limited
Cheddleton Flint Mill
Cheddleton Parish Council
chells building supplies
Cheshire East Council
Chief Constable
Christopher Taylor Design
Church Commissioners
Churnet Valley Conservation Society
Churnet Valley Living Landscape Partnership
Churnet Valley Railway
Churnet Valley Riders
Citizen's Advice Bureau
City Of Stoke On Trent Council
Civil Aviation Authority
Clowes Coaches
Colliers International
Commercial Estates Projects Limited
Commission For Architecture And The Built Environment
Community Council Of Staffordshire
Community Health Partnerships
Concept Town Planning
Congleton Town Council
Conlech Enterprises Ltd
Consall Hall Gardens
Consall Parish Council
Co-Operative Bank
Co-operative Group (Co-op Property)

List of statutory consultees and other stakeholder organisations
Co-operative Group Limited (COOP)
Copelands Tours
Cornhill Residents Association
Cotton College
Cotton Lane Farm
Cotton Parish Council
Council For British Archaeology
Country Land & Business Association
Courtaulds (UK) Limited
Cowdray Planning Consultancy
CPRE
CPRE Staffordshire
Crown Office Estate
Crownhill Construction Ltd
Croxden Parish Council
CT Planning
D And G Coaches
Danbank Developments Limited
Daniel And Hulme
Daniel and Sons
Davera Properties Limited
David Taylor Chartered Surveyors
David Wilson Homes (North West)
DB Schenker Rail (UK) Ltd
DBA Estates
DBD Architectral Consultancy
Deaflinks
Dean Lewis Estates Limited
Defence Estates

List of statutory consultees and other stakeholder organisations
Delma Developments Limited
Demon Pension Fund
Denstone Farm Shop
Denstone Parish Council
Department For Culture, Media And Sport
Department for Transport
Department For Work & Pensions
Dept For Environment, Food & Rural Affairs
Derbyshire County Council
Derbyshire Dales District Council
Derbyshire Gypsy Liaison Group
Development Plans and Implementation
Dilhorne Parish Council
Dilhorne Residents
DPDS Consulting Group
Draycott Parish Council
DTZ Piedad Consulting
Dunelm
DUNSTABLE DOWNS PROPERTIES LIMITED
E W Boden & Sons
East Midlands Trains
East Staffordshire Borough Council
Eastrange Estates Ltd
Eclipse Broadcast Ltd
Edmund Kirby
EE
Emery Planning Partnership
Endon Cricket Club
Endon WI

List of statutory consultees and other stakeholder organisations
Endon With Stanley Parish Council
Enhanced Developments Limited
Environment Agency
EON Energy
E-on/Central Networks
Equality And Human Rights Commission
Faber Maunsell
Family Group
Farley Parish Council
Farm2grow
Fawfieldhead Parish Council
First PMT
First Potteries Buses
Fisher German LLP
FOCAL
Focal Ltd
Forsbrook Parish Council
Forshaw Greaves & Partners
Foxfield Railway
Foxt Action Group
Fradley Estates
Framed in Stitches
Framptons
Frank Marshall LLP
Freight Transport Association
Friends Families & Travellers
Friends Of Brough Park
Friends Of Consall
Friends Of The Earth

List of statutory consultees and other stakeholder organisations
Frontcustom Ltd
Frost Planning
Fulford Parish Council
Fusion Online Ltd
FW Harrison (Commercials) Ltd
G L Hearn
Gallagher Developments Limited
Garden History Society
George Wimpey North Midlands
Georgian Group
GL Hearn Ltd
Gladman Developments Ltd
Graham Watkins & Co
Grant Anderson Hill Dickinson LLP
Green Hedges
Greenpoint Builders Limited
Grindon Parish Council
GVA Grimley
Hacking Ashton LLP
Hadleigh Estates
Halfern Ltd
Hammersley Hayes Residents Action Group
HAP UK
Haregate Residents Association
Harlequin Development Strategies (Crewe) Limited
Harris Lamb Limited
Harrison Wood Architecture
Harvest Housing
Harvest Properties Limited

List of statutory consultees and other stakeholder organisations
Haston Reynolds Partnership
hazles cross farm nursery
Health & Safety Executive
Heath House Events Ltd
Heathylee Parish Council
Heaton Parish Council
Heaton Planning
Heine Planning
Heritage England
Hewitt & Carr Architects
High Peak Borough Council
High Peak Buses
Highways Agency
Highways England
Hilderstone Parish Council
Hinson Parry and Company
Historic England
Historical Association (North Staffordshire)
HLW Developments Ltd
Hollington Residents' Steering Group
Hollinsclough Parish Council
Hollinshead Coaches
Home Builders Federation
Homes and Communities Agency
Honourable Secretary of Leek Town Lands Trust
Horsley Sparrow Consultancy Ltd. & Willardwillard
Horton Parish Council
Hotel Rudyard
Hourigan Connolly

List of statutory consultees and other stakeholder organisations
HOW Planning LLP
Humphries Builders Ltd
Ibstock Brick Limited
Ilam Parish Council
Indigo
Inland Waterways Association
Ipstones Developments Limited
Ipstones Parish Action Group
Ipstones Parish Council
Irish Traveller Movement in Britain
Ivy Architectural Services Ltd
J C Bamford Excavators Ltd
J P Properties
J W Cook and Sons
JCM Group Holdings (UK) Limited
Jeffries Group
JMW Planning Ltd
John Munroe Hospital
John Pointon And Sons Ltd
Johnson Poole & Bloomer
Junction Rd, Sandon St And Glebeville Residents Association
JVH Town Planning Consultants
JWPC Limited
Keepmoat
Ken Wainman Associates Ltd
Kerry James Planning
KeyworkerHomes (NW) Ltd
Kidsgrove Town Council
Kilbride Group

List of statutory consultees and other stakeholder organisations
Kingsley Bird and Falconry Centre
Kingsley Parish Council
Kingsley residents
KJD
Knight Frank
Knights LLP
Knotty Bus & Coach
Knypersley Community Association
Lambert Smith Hampton
Laver Leisure (Oakamoor) Ltd
Lawn Tennis Association
Leek And District Civic Society
Leek and District Fly Fishing Association
Leek and Moorlands Building Preservation Trust
Leek Auctions Ltd
Leek Chamber Of Trade And Commerce
Leek Co-housing Limited
Leek Cricket Club
Leek Dyeing Co Ltd
Leek Golf Club
Leek High Specialist Technology School
Leek Hockey Club
Leek Ramblers Association
Leek Ramblers' Committee
Leek Sports Council
Leek Town Council
Leekfrith Parish Council
Leigh Parish Council
Lichfield Diocesan Board of Finance

List of statutory consultees and other stakeholder organisations
Liggins Thomas
Litchfield Diocesan Board of Finance
Longnor Parish Council
Longsdon Parish Council
Lorimer Estates Ltd
M J Barrett Developments
M W Trustees
Macclesfield Road Developments
MADE (Midlands Arch. & Designed Env.)
Mancunian Mercantile Investments Limited
Manifold Cycle Hire
Manybrook Ltd
Marine Management Organisation
Mayfield Parish Council
McDyre & Co Ltd
Michael Green Planning Services
Midland Heart
Milwood Ltd
MMI Properties
Mono Consultants
Monty Large Associates
Moorland and City Railways Ltd
Moorland Architectural Services
Moorland Buses
Moorlands Homes (Cheadle) Ltd
Moorlands Housing
Moorlands Rehabilitation (Staffordshire) Ltd
Moorside High School
Morebairn Ltd

List of statutory consultees and other stakeholder organisations
Morston Assets Ltd
Mosaic Estates
Moss Brothers Feeds
Muller Property
Murray Chartered Accountants
Nathaniel Lichfield
National Association of Teachers of Travellers
National Association of Gypsy and Traveller Officers
National Farmers Union (Leek & Rushton Branch)
National Federation of Gypsy Liaison Groups
National Grid
National Travellers Action Group
National Trust
Nationwide Building Society-Land At Biddulph
Natural England
Network Rail, Town Planning Team LNVW
Newbold Astbury-cum-Moreton Parish Council
Newcastle under Lyme Borough Council
Newford Ltd
NFU
NHS England
NJ Docksey Ltd
NJL Consulting
North Associates
North Staffordshire Asperger And Autism Association
North Staffordshire Chamber Of Commerce & Industry
North Staffordshire Divisional Police
North Staffordshire Railway Company
North Staffordshire railway company (1978) Limited

List of statutory consultees and other stakeholder organisations
North Staffs CCG
North Staffs MIND
North Staffs Obesity Support Group
North Staffs Users Group
NPower
O2
Oakamoor Action Group
Oakamoor Parish Council
Odd Rode Parish Council
Office Of Government Commerce
Office of Rail Regulation
Office of the Police and Crime Commissioner
Okeover Parish Meeting
Oliver Dyke Associates Ltd
Onecote Parish Council
Openreach Newsites
Panhurst Developments Ltd
Parkwood Leisure
Paul Sharpe Associates LLP on behalf of Fradley Estates
Peacock & Smith
Peak And Northern Footpaths Society
Peak District Local Nature Partnership
Peak District National Park Authority
Peak District Rural Housing Association
Peak Pursuits
Peaks and Plains Housing Trust
Peakstones Rock Brewery
Pegasus Group
Pegasus Planning Group

List of statutory consultees and other stakeholder organisations
Persimmon Homes
Philip G Hobson & Associates
Phillips Planning Services
Planning Design
Planning Issues
Planning Together Group
Plants Haulage
Planware Ltd
Plus Dane Housing Group
Price Homes
Property Department, Investacc
Providence Land Ltd
Punch Taverns
Quarnford Parish Council
R G Foster Textile Machinery Ltd
Radleigh Homes
Rail Freight Group
Rail Property Limited
Ramblers Association
Ramblers Retreat
Rapiddream
Recycled Teenagers
Redrow Homes
Renew Land
Renew North Staffordshire
Rethink
Richardson Chartered Surveyors
Richborough Estates
Road Haulage Association

List of statutory consultees and other stakeholder organisations
Rob Duncan Planning Consultancy
Robin Hood Coaches
Roche House Farm Livery Limited
Roger Tym And Partners
Roger Yarwood Planning Consultant Ltd
Rotary Club Of Biddulph
Royal Mail Group Ltd
Royal Mail Properties
Royal Society For The Protection Of Birds
RPS Chapman Warren
RPS Planning & Development
RS Building Consultants
RSPB
Rudyard Lake Steam Railway
Rudyard Lake Trust
Rudyard Sailability
Rural Transport Co-ordinator
Rushton Neighbourhood Plan Group
Rushton Parish Council
Ryder Ford
S.U.N. (London) Limited
Sainsbury's Supermarkets Ltd
Saint Werburghs Primary School
Sammons Architectural Ltd
Sanctuary Housing Group
Sapling Associates Ltd
Savills
Saxon Tyres
Scentarea Ltd

List of statutory consultees and other stakeholder organisations
School Business Manager
School Organisation Team, Staffordshire County Council
School Sports Partnership
Sedgwick Associates
Selectus Ltd
Severn Trent Water Limited
Sheen Parish Council
Sibelco UK Ltd
Silotank UK Limited
Simply Staffordshire
Site Director
Slimma Plc
SLR Consulting Ltd
Smartwright Developments Limited
Society For The Protection Of Ancient Buildings
South Staffordshire Council
Spatial Planning Service
Special Matters/Sure Start
Sport Across Staffordshire County Sports
Sport England
St Lawrence's Church
St Leonards Primary School
St Luke's CE Primary School
St Modwen Developments Limited
Stafford Borough Council
Staffordshire Assoc. Registered Care Providers
Staffordshire Badger Conservation Group
Staffordshire County Council
Staffordshire County Council (Highways)

List of statutory consultees and other stakeholder organisations
Staffordshire County Council Stoke-on-Trent & Staffordshire Enterprise Partnership
Staffordshire Fire & Rescue Service
Staffordshire Housing Association
Staffordshire Housing Trust
Staffordshire Mental Health
Staffordshire Moorlands CVS
Staffordshire Parish Councils Association
Staffordshire Peak District Tourism Association
Staffordshire Police
Staffordshire Police Arch.Liaison Service
Staffordshire Rural Development Ltd
Staffordshire University Business School (Stoke Campus)
Staffordshire Wildlife Trust
Staffordshire Youth Service
Staffs Fitness Ltd
Stanley Keates And Sons
Stansgate Planning Consultants
Stanton Parish Council
Steven Abbott Associates LLP
Stewart Ross Associates
Stirling Investments
Stockglen Limited
Stoddards Ltd
Stoford Living Limited
Stoke on Trent Boat Club
Stoke on Trent Housing Society Limited
Stoke-on-Trent and Staffordshire LEP
Stoke-on-Trent Boat Club

List of statutory consultees and other stakeholder organisations
Stoke-on-Trent City Council
Stratus Environmental Limited
Susan Jones Consultancy
Sustrans
SWAT
Swinton Group Limited
T Mobile UK Ltd
Tarmac Central Ltd
Team Cheadle
Tesco Stores Ltd
Tessengerlo Fine Chemicals Ltd
The American Clubhouse
The Camping And Caravanning Club
The Coal Authority
The Co-operative Group
The Co-operative Group Limited
The Forestry Commission
The Georgian Group
The Gypsy Council
The Gypsy Council for Health Education Culture Welfare and Civil Rights
The Home Office
The Landmark Trust
The Planning Bureau Limited
The Planning Inspectorate
The Royal Society For The Protection of Birds
The Showmen's Guild Of Great Britain
The Theatres Trust
The Threshing Barn
The Water of Ayr & Tam O'Shanter Hone Works Ltd

List of statutory consultees and other stakeholder organisations
Theatres Trust
THREE
Tittesworth Parish Council
Tittesworth Water
Tom Brough And Co
Transition Leek
Transport Investments Ltd
Traveller Law Reform Project
Trimex Building Ltd
Turley Associates
Turners Pasture Limited
Tyler Parks Partnership
UK Coal
United Utilities PLC
United Utilities Water Limited
Urban Vision
Victorian Society
Virgin Media
Visit England
Visit Peak District
Vodafone and O2
Vodafone Group Plc
Voluntary Action Stoke On Trent
VVSM
VWB Architects
W M Morrison Supermarkets PLC
W M Plant And Sons
Wainhomes (North West) Limited
Walsall Black Sisters Collective

List of statutory consultees and other stakeholder organisations
Warsaw Development Ltd
Warslow And Elkstones Parish Council
Washbournefield Planning
Waterhouses Parish Council
Werrington Parish Council
West Midlands Ambulance Service
West Midlands HARP Planning Consortium
West Midlands Planning Aid
Western Power Distribution
Westons
Westwood Golf Club
Wetton Parish Council
Whiston Action Group
Whiston Parish Council
White Young Green
Willardwillard Ltd
Wincle Parish Council
Wints Coaches
Witherspoon Property Holdings Ltd
WM Plant & Sons (Haulage) Ltd
Womens National Commission
Woodland Trust
Wootton Parish Council
Wrekin Housing Trust
WYG
Your Housing Group
Your Moorlands Housing Association
Youth Of Moorlands Action Council
Youth Service

Appendix 3
Consultation material

Figure A3.1: Statement of Representations Procedure



The Town and Country Planning (Local Planning) (England) Regulations 2012 – Regulation 19

Statement of Representations Procedure and Availability of Documents Staffordshire Moorlands Local Plan

The Council is inviting comments, also known as representations, on the Staffordshire Moorlands Local Plan Submission Version. The information below sets out an overview of the content of the Local Plan and the area it covers, how to view the plan and supporting documents, how to make representations and by when and how to obtain further information.

Document

Staffordshire Moorlands Local Plan Submission Version (February 2018)

Subject matter and area covered

The Staffordshire Moorlands Local Plan sets out the broad spatial strategy and policy framework for the Staffordshire Moorlands District up to 2031. The document identifies where development will take place, how new jobs will be supported and how the environment of the District will be protected and enhanced. It allocates sites for new development and includes the policies that will be used to make decisions on planning applications, and how the plan will be monitored. The Plan also shows how changes in policy allocations and designations will be reflected as changes to the Policies Map.

The Local Plan covers the whole of the administrative area of Staffordshire Moorlands excluding the Peak District National Park.

Statement of Fact – How to View the Local Plan Documents

The Local Plan together with the accompanying Policies Maps, Consultation Statement, Sustainability Appraisal, Equalities Impact Assessment, Habitats Regulation Assessment, Summary Document and a copy of this statement are available for inspection throughout this period on the Council's website (address given below) and at Leek, Cheadle, Biddulph, Werrington and Blythe Bridge libraries (to view opening times, use the following link:

<https://www.staffordshire.gov.uk/leisure/librariesnew/libraries.aspx>) and the Council's offices at:

- **Leek** Moorlands House, Stockwell Street, Leek, Staffordshire, ST13 6HQ (8.45am - 5.15pm Monday - Thursday and 8.45am - 4.45pm on Friday)
- **Cheadle** Councils Connect, 15a-17 High Street, Cheadle, Staffordshire, ST10 1AA (9.00am - 12.30pm & 1.00pm - 5.00pm on Monday, Wednesday and Friday)
- **Biddulph** Town Hall, High Street, Biddulph, Staffordshire, ST8 6AR (9.00am - 5.00pm Monday – Friday)

Key evidence base documents (the Duty to Co-operate Statement, Site Proformas, Other Suggested Sites from 2016 and 2017 Consultations and the Infrastructure Delivery Plan) are also available for inspection on the Council's website (given below) and at the Council's

offices listed above. There are also a considerable number of other supporting documents and evidence base reports which underpin the Local Plan and these can be viewed online at www.staffs Moorlands.gov.uk/localplan. Alternatively paper copies of these documents are available to inspect by prior arrangement with the Regeneration Team.

Paper copies of documents can be provided directly to interested parties if requested, however please note that printing charges will apply. Copies of documents in alternative formats (e.g. large print) can also be made available on request.

How to Make Representations

The statutory period in which representations can be made on legal compliance and the 'soundness' of the Submission Version Local Plan will run between 27th February and 5pm on 11th April 2018.

To be valid, all representations must be submitted within this period and relate to matters of legal compliance and/or 'soundness' of the Local Plan. The Council considers the Local Plan – Submission Version to be sound, so representations should specify in what respect(s) the Plan is considered to be unsound and what change(s) would be needed to be made to make it sound.

More information and help on making representations can be found in Guidance Notes available on the Council's website and at the libraries and Council offices listed above. If you choose to make representations, the Council will need your consent to store and use your personal data to contact you about arrangements for the examination.

Representations can be made electronically by way of the Council's website or by email or in writing using a representation form available from the website and all libraries and Council offices listed above. They should be returned to the email address or postal address given below.

Website: www.staffs Moorlands.gov.uk/localplan

Email: forward.plans@staffs Moorlands.gov.uk

Post: Freepost RRLJ-XCTC-JBZK, Forward Plans, Staffordshire Moorlands District Council, Regeneration Services, Moorlands House, Stockwell Street, Leek, ST13 6HQ

Representations must be returned by 5:00pm on 11th April 2018.

Representations may be accompanied by a request to be notified at a specific address of any of the following:

- the submission of the Local Plan for independent examination,
- the publication of the recommendations of the Inspector appointed to carry out an examination, and
- the adoption of the Local Plan.

Further Information

This can be obtained from the Council's website or by contacting the Planning Policy team of the Council by email at forward.plans@staffs Moorlands.gov.uk or by phone on 01538 395570. General information regarding Local Plans and the examination process can also be obtained from the Planning Portal at www.planningportal.gov.uk/planning/

Figure A3.1: Email sent to contacts on the Council's database

Wooddisse, Ruth

From: Forward Plans
Subject: Publication of Staffordshire Moorlands Local Plan (Submission Version)
Attachments: Statement of Representations Procedure and Availability of Documents.pdf

From: Forward Plans
Sent: Tuesday, February 27, 2018 10:12 AM
Subject: Publication of Staffordshire Moorlands Local Plan (Submission Version)



Dear consultee

Publication of Staffordshire Moorlands Local Plan (Submission Version)

Staffordshire Moorlands District Council has published its Local Plan. The Local Plan sets out the broad spatial strategy and policy framework for the Staffordshire Moorlands District up to 2031. The document identifies where development will take place, how new jobs will be supported and how the environment of the District will be protected and enhanced.

There is now a formal six week period when representations can be made, regarding its legal compliance and soundness from **February 27th to 5pm on April 11th 2018**.

The Council will then send the Local Plan to an independent Inspector before it can be formally adopted. If you would like the Inspector to consider your views, you need to submit representations to this consultation. Representations should be submitted using forms supplied by the Council and returned using the online consultation portal, or by email or post. Representations should specify in what respect(s) the Plan is considered sound or unsound and what change(s) would be needed to make it sound. Representations may also relate to whether you consider the Local Plan to be legally compliant.

In line with Regulation 13 of the Environmental Assessment of Plans and Programmes Regulations 2004, the Council is also consulting on its Sustainability Appraisal report. Details of where to view the document and how to respond are set out below.

The Local Plan and supporting documents can be viewed at the Council offices and libraries in Staffordshire Moorlands and online at: www.staffsmoorlands.gov.uk/localplan

More detail and information is provided in the attached Statement of Representations Procedure. Additional guidance is also provided at the venues and website listed above. If you choose to make representations, the Council will need your consent to store and use your personal data to contact you about arrangements for the examination.

If you have any further queries please contact us by email at forward.plans@staffsmoorlands.gov.uk

Yours sincerely

Regeneration Team
Staffordshire Moorlands District Council

Figure A3.3: Social media being used to raise awareness of the consultation

